

## Sino-Ocean Group Tax Policy

Sino-Ocean Group regards compliance and integrity as the foundation of tax governance, striving to establish a transparent, clear, and responsible tax practice framework across diverse jurisdictions. The Company adopts an open and transparent approach to strengthen communication and collaboration with regulatory authorities and stakeholders, promoting a positive tax ecosystem based on joint construction, cogovernance, and shared benefits. This policy is approved by the Sustainable Development Management Committee authorized by the Board of Directors.

- The Company strictly complies with the spirit as well as the letter of the tax laws and regulations in the countries in which the company operates, and fulfills its tax obligations and exercises its taxpayer rights in accordance with the law;
- The Company adheres to the principle of legal and compliant tax practices, firmly rejecting any form of tax avoidance. We emphasize the substance and authenticity of business activities, refraining from using tax planning as a guise for evading responsibilities. We do not use tax structures without commercial substance, do not transfer value created to low-tax jurisdictions, and do not use secrecy jurisdictions or so-called tax havens for tax avoidance. We voluntarily fulfill tax obligations commensurate with economic substance, and are committed to building a fair, transparent, and sustainable business environment;
- The Company strictly complies with transfer pricing rules in the jurisdictions where it operates and uses the arm's length principle to ensure that pricing in related-party transactions fully reflects market conditions and genuine commercial value.

This policy is updated every three years. It can be reviewed and updated as appropriate when necessary.