# Tongwei Co., Ltd.

# Tax Management Commitment and Policy

Tongwei Co., Ltd. (hereinafter referred to as “Tongwei” or “the Company”) has always balanced commercial value with social responsibility, and is committed to conducting business with higher ethical standards. The Company adheres to the tax management goals of “lawful tax compliance, risk management, and sound operations,” continuously improves its tax governance system, and standardizes tax management practices. The Company strictly complies with applicable tax laws and regulations in its operating locations, such as the *Tax Collection and Administration Law of the People's Republic of China*, the *Enterprise Income Tax Law of the People's Republic of China*, and the *Value-Added Tax Law of the People's Republic of China*, and also refers to international tax rules, including the Organization for Economic Co-operation and Development (OECD) *Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations* and the *G20/OECD Base Erosion and Profit Shifting (BEPS) Action Plan*, to continuously strengthen its tax compliance practices.

## 1. Scope of Application

This policy applies to all business and operational activities of Tongwei and its subsidiaries and branches. The Company also advocates that suppliers, contractors, partners, and other business associates adhere to the principle of paying taxes lawfully and in good faith to jointly create a fair, transparent, and compliant business environment.

## 2. Responsible Departments

The Board of Directors is the highest decision-making and supervisory body for tax management, responsible for overseeing the development of the Company’s tax governance system and reviewing major tax management matters, related policies, and commitments. As the designated department for tax management, the Finance Department is responsible for establishing the tax management system, tax risk management, tax filing, tax planning, and communication with tax authorities, while continuously improving the internal tax control system. All business departments shall cooperate with tax management work according to their respective responsibilities, ensure that business activities meet tax compliance requirements, and provide tax-related information in a timely

and accurate manner.

## 3. Tax Management Commitments and Policy

**1. Commitment to Lawful and Good Faith Tax Compliance:** The Company strictly complies with the tax laws and regulations applicable in the jurisdictions where it operates, accurately fulfills its statutory obligations, including tax filing and tax payment, and conducts tax management in accordance with both the letter and spirit of applicable tax laws, thereby minimizing or eliminating deviations in the implementation of tax legislation.

**2. Commitment to Aligning Taxation with Value Creation:** The Company adheres to the principle of matching profits with value creation and does not artificially transfer taxable profits to low-tax jurisdictions and tax havens through unreasonable related-party transactions, profit shifting, or other arrangements, ensuring that operating results and tax obligations are appropriately aligned with the jurisdictions where value is created.

**3. Commitment to the Principle of Economic Substance:** All of the Company's tax arrangements shall have a genuine and reasonable commercial purpose and are not primarily aimed at obtaining improper tax benefits. The Company does not establish organizational structures or transactional arrangements that lack commercial substance.

**4. Commitment to the Arm's Length Principle:** The Company conducts related-party transactions in accordance with the arm's length principle, reasonably determining transaction prices and profit allocation based on the functions performed, risks assumed, and assets employed by each entity. It also prepares and maintains transfer pricing documentation as required by applicable laws and regulations to ensure that related-party transactions are fair, equitable, and transparent.

## 4. Appeal and Reporting Mechanism

The Company provides accessible communication and appeal channels to ensure the effective implementation of this policy. Employees, suppliers, partners, customers, and other stakeholders may, either anonymously or openly, submit appeals and/or report concerns about tax risk to Tongwei Supervisory Department through the following channels:

- Tel: (028) 86168834, 86168838
- Mobile: 15608175053 (Also for WeChat)
- WeChat Official Account: Search for and Follow “Integrity Tongwei”
- Email: jcb@tongwei.com
- Mailing Address: Supervisory Department, Tongwei, Tongwei International Center, 588 Middle Tianfu

Avenue, Chengdu, Sichuan Province 610041, China

The Company is committed to investigating and handling reported cases in accordance with laws and regulations, ensuring procedural fairness and objective conclusions, and providing timely feedback to the relevant parties. The Company protects whistleblowers and appellants by law, ensuring they are not subject to threats, intimidation, harassment, retaliation, or any other form of unfair treatment as a result of their appeal and/or report. Additionally, the Company maintains strict confidentiality regarding the content of all appeals/reports received.

CEO: Liu Shuqi

Tongwei Co., Ltd.

Date: April 2026

Remarks:

1. The Company encourages and supports suppliers and partners to adopt and implement additional principles and policies, provided that they do not conflict with this policy.
2. The Company's business operations strictly comply with the local laws and regulations. In the absence of specific local legal requirements, this policy shall be followed.
3. This document is interpreted and revised by Tongwei Co, Ltd. The company will update the document in a timely manner based on domestic and international policies, regulatory requirements, and industry developments. In the event of any inconsistencies between the Chinese and English versions of this document, the Chinese version shall prevail.