

# **ZJLD Group**

# **Tax Governance Policy**

Version: A/0

Prepared by: Accounting Department

Reviewed by: CEO

Approved by: Board of Directors

# Tax Governance Policy

## Chapter 1: General Provisions

**Article 1** This Policy is formulated to strengthen tax governance, ensure legal operations, reasonably control tax risks, and prevent tax violations in response to the Company's business development needs.

**Article 2** This Policy is established in accordance with the Law of the People's Republic of China on the Administration of Tax Levying, the Implementation Rules for the same, and other relevant tax regulations.

**Article 3** This Policy applies to the Group and its subsidiaries (collectively referred to as the "Company," "Group," or "we").

## Chapter 2: Commitment

**Article 4** To ensure legal compliance with tax payments and effectively control tax risks, the Group commits to the following:

- **4.1** Compliance with the spirit and letter of tax laws and regulations in all operating regions.
- **4.2** Not transferring value created to low-tax jurisdictions.
- **4.3** Not utilizing tax structures lacking commercial substance.
- **4.4** Adopting transfer pricing based on the arm's length principle.
- **4.5** Avoiding secrecy jurisdictions or "tax havens" for tax avoidance.

## Chapter 3: Management Body

**Article 5** This Policy is discussed, reviewed, and approved by the Board of Directors. The Board oversees its implementation and regularly reviews it, while the Audit Committee incorporates tax risks into enterprise risk management for timely responses to tax-related challenges.

**Article 6** The Accounting Department designates a tax supervisor responsible for:

- **6.1** Formulating, supervising, and implementing the Company's tax strategy and policy.
- **6.2** Staying updated on the latest tax laws relevant to the Group's operational regions and providing suggestions for compliance.
- **6.3** Researching the Group's tax environment and preparing tax planning aligned with business needs.
- **6.4** Managing the accounting, declaration, and payment of taxes, ensuring compliance with legal requirements in each jurisdiction.
- **6.5** Analyzing the Group's tax data to enhance transparency.

- **6.6** Conducting professional training related to the Company's taxation.

## **Chapter 4: Supplementary Provisions**

**Article 7** The Accounting Department is responsible for interpreting this Policy.

**Article 8** This Policy is approved by the Board of Directors and takes effect immediately upon release.