

Longshine Technology Group Co., Ltd.

Tax Policy Commitment

In response to systemic challenges such as global tax rule changes, cross-border tax avoidance governance, and increasing ESG transparency requirements, Longshine Technology Group Co., Ltd. (hereinafter referred to as “the Company” or “Longshine Group”) fully recognizes the strategic importance of tax compliance governance for sustainable operations and international competitiveness. Based on the OECD Inclusive Framework on BEPS, the UN Model Double Taxation Convention, and Chinese tax laws and regulations, and adhering to the business principle of "Conducting Business with Integrity," Longshine Group hereby formulates this Tax Policy Commitment (hereinafter referred to as “this Commitment”).

The Company is committed to upholding tax ethics and legal standards in its global operations. By establishing a sound tax governance structure and risk prevention system, we ensure that our tax contributions align with the substance of our economic activities. Through setting quantifiable compliance objectives and action plans, we strive to achieve the following core values:

Safeguarding Fairness of Tax Sovereignty: Refusing tax avoidance practices that erode the tax bases of various countries;

Strengthening Stakeholder Trust: Responding to the concerns of investors, regulators, and the public through transparent tax practices;

Driving Sustainable Development: Transforming tax compliance into ESG governance competitiveness;

This policy applies to all operations of Longshine Group.

Main Content

I. Tax Compliance Commitment

The Company shall strictly comply with the tax laws, regulations, and international tax agreements of all countries and regions where it operates, ensuring that all tax declarations, tax payments, and information disclosures meet local regulatory requirements and uphold the enterprise's tax compliance credibility.

II. Opposition to Abuse of Tax Rules

The Company firmly opposes any form of abuse of tax rules. It will not artificially structure the transfer of value created by the Company to low-tax jurisdictions and will prohibit the use of tax differentials for profit shifting, ensuring that tax contributions correspond to the substance of economic activities.

III. Commercial Substance and Reasonableness of Tax Structures

The corporate tax structure should be based on genuine commercial purposes:

The Company prohibits the use of tax arrangements lacking commercial substance (e.g., shell companies without genuine business functions). All tax structures must serve legitimate business needs and pass reasonableness tests.

IV. Arm's Length Principle

All cross-border and related-party transactions conducted by the Company shall adhere to the "arm's length" principle in determining transfer prices, ensuring that transaction terms and profit allocations are consistent with those that would be agreed upon by independent third parties.

V. Resistance to Tax Haven Practices

The Company firmly resists the use of secrecy jurisdictions for tax avoidance. It will not establish or use entities in "tax havens" for tax avoidance purposes and will not participate in any activities that conceal profits or evade tax obligations through opaque jurisdictions.

VI. Governance and Supervision Mechanism

The Company has established a board-level tax compliance supervision system. The Board's ESG Sustainable Development Committee will continuously monitor the implementation of this policy to ensure its effectiveness and will recommend any necessary amendments to the Board and the Board's ESG Sustainable Development Committee for approval.

Review and Monitoring

The ESG Sustainable Development Committee will continuously monitor the implementation of this policy to ensure its effectiveness and will recommend any necessary amendments to the Board for approval.

Disclosure and Publication

This policy is published on the Company's website for public access.

A summary of this policy and the measurable objectives established by the Company for its implementation, along with progress towards these objectives, will be disclosed annually in the Longshine Group ESG Report.