

Sinyi Realty Inc.
Tax Governance Policy

Article 1 Purpose

Facing trends of globalized business management and increasingly complex cross-border business transactions, Sinyi Realty Inc. (hereinafter referred to as "the Company") establishes the tax governance policy (hereinafter referred to as "the Policy") to deal with those challenges, and to fulfill the goal of corporate sustainability and embody corporate social responsibility.

Article 2 Applicable Entity

The Policy applies to entire operating activities of the Company and group enterprises the Company.

Article 3 Tax Governance Principle

The Company's tax governance shall adhere to principles as follows:

1. All operations are handled in accordance with relevant tax laws and regulations, and pay taxes in compliance with the law.
2. Maintain transparency in tax information and comply with financial reporting standards and the rules governing disclosure in annual reports.
3. Properly evaluate and manage tax risks when making or executing tax strategies.
4. Make advance tax analysis to avoid double taxation, reasonably and legally reduce tax costs, and create shareholder value.
5. Develop strong, mutually respectful relationships with tax authorities based on transparency and trust.
6. Inter-company transactions are based on the arm's length principle, in compliance with internationally accepted transfer pricing guidance published by the OECD.

Article 4 Roles and Responsibilities

1. The Chairman is the supreme unit in decision making, approval of the Policy, to ensure the effective implementation of tax governance.
2. Finance Department is the tax management unit, responsible for constitution of the Policy and framework for tax governance, and monitoring ongoing execution compliance with the principles mentioned above.

With respect to other tax matters, it is non-periodically reported to the Chairman, depending on the significance of tax issues judged by the Head of Finance Department. If necessary, it should be reported to the Board of Directors.

Article 5 Implementation and Amendment

The Policy is implemented upon the approval of the Chairman, as are amendments.