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INSIGHTS AND IDEAS

1. Administration of Online Games: MOC or GAPP

LEGAL UPDATES

1. Supplemental Rules II to Measures on the Administration of Foreign Invested Books, Newspapers and Journals Distribution Enterprises and Supplemental Rules to Measures on the Administration of Sino-foreign Cooperative Videos and Sound Recording Products Distribution Enterprises
2. Administrative Measures of Express Service License and the Guidelines to Express Service License Conditions
3. Measures on the Administration of Releasing Radio and Television Advertisements
4. The State Council Approved Notice Preventing Overcapacity and Duplicate Construction in Wind Power Equipment Industry
5. Implementing Rules for the Administrative Regulations on Commercial Performance (promulgated on September 3, 2009)

INSIGHTS AND IDEAS

Administration of Online Games: MOC or GAPP (Author: Rong HUANG; Yeting CAI)

In July 2008, the General Office of the State Council issued the *Regulations on the Main Functions, Internal Bodies and Staffing of the Ministry of Culture*, and the *Regulations on the Main Functions, Internal Bodies and Staffing of the General Administration of Press and Publication* (collectively the “**Regulations**”). According to Article 5 of the Regulations, the Ministry of Culture (“**MOC**”) is responsible for the industry planning, industrial base, project construction, exhibition and trading and market supervision of online games, and the General Administration of Press and Publication (“**GAPP**”) is responsible for the pre-approval of online publishing of online games.

However, in practice, MOC and GAPP (collectively the “**Two Departments**”) have different understanding towards the Regulations. In order to streamline their respective responsibilities, the State Commission Office for Public Sector Reform issued the *Circular on Printing and Issuing Interpretations by the State Commission Office for Public Sector Reform of Relevant Articles Regarding Animation, Online Game and Comprehensive Law Enforcement of Culture Market of the Three Regulations on the Main Functions, Internal Bodies and Staffing of the Ministry of Culture, the State Administration of Radio Film and Television and the General Administration of Press and Publication* (the “**Interpretations**”) on September 16, 2009. The Interpretations states that MOC is the governmental body directly responsible for the administration of and supervision over online games industry

(1) The Interpretations clarify the administration of online games

(a) MOC is the department directly responsible for online game administration

According to the Regulations, the MOC is responsible for online game-related industry plan, industrious base, project construction, exhibition and trading and market supervision, and the GAPP is responsible for the pre-approval of online game publications. In addition, the Regulations also assign the online game administrations (except for the pre-approval of online game publications) and the related industry plan, industrious base, project construction, exhibition and trading and market supervision which belong to GAPP before to the MOC. The Interpretations expressly provide that MOC is the department directly responsible for online game administration.

(b) GAPP is responsible for the pre-approval of online game publications

According to the Regulations, the GAPP is responsible for the pre-approval of online game publication, but it has no right to directly investigate online games. Under the Regulations, the release of online games via internet is referred to as online game publications, and pre-approval means that the GAPP is authorized to examine and approve online game publications before these games are provided to users via internet as approved by the Ministry of Industry and Information. In addition, the Regulations prescribe that the MOC shall allow online games pre-approved by the GAPP to be put online and no further or repeated examination shall be conducted; once put online, these online games shall be subject to the sole administration of MOC, including online game publications that have been put online without obtaining the pre-approval of GAAP. MOC is the only department that is authorized to order its cultural market enforcement team to investigate and suppress those online game publications that have

been put online without obtaining the pre-approval of GAAP.

With regard to the definition of online game publications under the Interpretations, some people are of the view that publications mean newspapers, periodicals, books, audio-visual products and electronic publications, etc in accordance with Article 2 of Chapter 1 of *the Regulations on the Administration of Publication* issued by the State Council. In other words, publications must be a physical medium, for example, game discs. As such, game downloading services provided to end users do not constitute publications and shall not be subject to pre-approval of GAPP, and shall be under MOC's administration instead. We are not in a good position to judge whether the forgoing view is accurate or not.

(2) New circular issued by GAPP

On September 28, 2009, following the issuance of the Interpretations, GAPP issued a new circular to implement the Interpretations and further Intensify the administration of pre-approval of online games and approval of imported online games(the "**Circular**").

The Circular states that the acts of providing online interactive or downloading services of online games to the public via internet are online game publication activities, which are subject to the pre-examination and approval of GAPP. The Circular further provides that where any online games are placed online without the approval of GAPP or the content of the approved online games are altered without re-obtaining approval from GAPP, GAPP will notify the competent local press and publication departments to order the involved enterprises to suspend the operation services. It appears that these provisions are in discrepancy with those of the Interpretations, which states that MOC shall allow enterprises to put those online games that have passed the pre-examination and approval of GAPP online and no further or repeated examination shall be conducted; once put online, these online games shall be subject to the sole administration of MOC, including online game publications that have been put online without obtaining the pre-approval of GAAP. MOC is the only department that is authorized to order its cultural market enforcement team to investigate and suppress those online game publications that have been put online without obtaining the pre-approval of GAAP.

The power struggle between MOC and GAPP in relation to the administration of online games is continuing. We will keep a close eye on latest rules and policy developments in this regard and advise you of the same.

LEGAL UPDATES

1. Supplemental Rules II to Measures on the Administration of Foreign Invested Books, Newspapers and Journals Distribution Enterprises and Supplemental Rules to Measures on the Administration of Sino-foreign Cooperative Videos and Sound Recording Products Distribution Enterprises (Author: Yanlin LIU)

To promote a closer economic and trade relationship between the mainland and Hong Kong/Macau, and to encourage service suppliers from Hong Kong and Macau to establish commercial enterprises in the mainland, pursuant to the *Supplement VI to the Mainland and Hong Kong Closer Economic Partnership Arrangement* and *Supplement VI to Mainland and Macau Closer Economic Partnership Arrangement* (collectively, the “**CEPA Supplement VI**”) as approved by the State Council, on August 20, 2009, the General Administration of Press and Publication (“**GAPP**”) and the Ministry of Commerce (“**MOFCOM**”) jointly issued the *Supplemental Rules II to Measures on the Administration of Foreign Invested Books, Newspapers and Journals Distribution Enterprises* (GAPP and MOFCOM Order [2009] No.45, “**Circular 45**”) and the *Supplemental Rules to Measures on the Administration of Cooperative Videos and Sound Recording Products Distribution Enterprises* (GAPP and MOFCOM Order [2009] No.46, “**Circular 46**”). These two circulars became effective on October 1, 2009.

According to Circular 45, the minimum registered capital requirements for publication distribution enterprises set up in the mainland by Hong Kong and Macao service suppliers shall be determined by reference to those for mainland enterprises. Compared to the minimum registered capital requirements as set forth in the *Measures on the Administration of Foreign Invested Enterprises Engaged in Distribution of Books, Newspapers and Journals*, which is RMB 30,000,000 for wholesale enterprises and RMB 5,000,000 for retail enterprises, the *Regulations on the Administration of Publication Market*, which regulates the operation of mainland publication distribution enterprises, requires a minimum registered capital of RMB 2,000,000 for wholesale enterprises but imposes no requirements on the registered capital of retail enterprises. Hence, following the implementation of Circular 45, the registered capital of wholesale publication distribution enterprises established by Hong Kong and Macao service suppliers shall not be less than RMB 2,000,000, and the registered capital of retail publication distribution enterprises established by Hong Kong and Macao service suppliers shall be in compliance with the relevant provisions of the PRC Company Law, unless local regulations provide otherwise.

Circular 46 allows Hong Kong and Macao service suppliers to provide, in the form of wholly-owned operations, videos and sound recording products (including motion picture products) distribution services in the mainland. Before the implementation of Circular 46, pursuant to the *Measures on the Administration of Cooperative Videos and Sound Recording Products Distribution Enterprises* which became effective on January 1, 2004, Hong Kong and Macao service suppliers may only set up videos and sound recording products distribution enterprises in the mainland in the form of joint ventures, and may only own no more than 70% of the interest or shareholding of the joint ventures. Circular 46 further states that in undertaking distribution services in the mainland in respect of videos and sound recording products, Hong Kong and Macao service suppliers should comply with the relevant laws, regulations and requirements of the review system in the mainland.

2. Administrative Measures of Express Service License and the Guidelines to Express Service License Conditions (Author: Yeting CAI)

To implement and enforce the *Postal Law of the People's Republic of China* as revised on April 24, 2009 (the "**New Postal Law**"), the Ministry of Transport, on September 1, 2009, promulgated *the Administrative Measures of Express Service License* (the "**Measures**"), which became effective as of October 1, 2009. In order to further clarify the conditions for issuing an express service provider license, the State Postal Bureau promulgated *the Guidelines to Express Service License Conditions* (the "**Guidelines**") on September 30, 2009. Key points of the Measures and the Guidelines are as follows:

(1) Qualification conditions

Under the Measures and the Guidelines, express services are classified into three categories, namely, express services provided within one province, autonomous region, and municipality directly under the Central Government (the "**Intra-provincial Operations**"), express service covering different provinces, autonomous regions, or municipalities directly under the Central Government (the "**Inter-provincial Operations**") and international express services (the "**International Operations**"). In addition to the licensing conditions which shall be met by all three categories, e.g., being a legal person, having a strict service quality management system and a sound security system, the Measures required different registered capital and service capacity according to different classifications.

- (a) Registered capital. The registered capital of enterprises engaging in Intra-provincial Operations shall be no less than RMB 500,000; the registered capital of those engaging in Inter-provincial Operations shall be no less than RMB 1,000,000 and that of International Operations shall be no less than RMB 2,000,000.
- (b) Service capacity.
 - ◆ *Network and delivery capability.* The network and delivery capability of an express enterprise shall match its geographical coverage.
 - ◆ *Inquiry service.* Intra-provincial express enterprises shall provide telephone inquiry service for intra-city couriers and make available extra online tracking service for inter-city deliveries. Express enterprises engaging in Inter-provincial Operations and International Operations shall have unified computer management systems, online tracking network and required data interfaces.
 - ◆ *Premises and equipment.* Express enterprises engaging in Inter-provincial Operations and International Operations shall possess close premises of a suitable area to process express mails and qualified handling, monitoring and fire-fighting equipment.
 - ◆ *Staff.* Where one company wishes to provide intra-city express services, the number of its express men who have primary-level national vocational qualification certificate or above shall be no less than 30%; the ratio for enterprises engaging in inter-city express services and Inter-provincial Operations shall be 40%, and that for International Operations shall be 50%. Besides, express enterprises engaging in International Operations shall have qualified customs declarers and inspection appliers.

(2) Examination and approval procedures

Under the Measures and the Guidelines, enterprises wishing to engage in Intra-provincial Operations shall apply to provincial postal administration bureaus for approval, whereas enterprises wishing to engage in Inter-provincial Operations or International Operations shall apply to the postal administration

of the State Council. In addition, the Measures and the Guidelines made clear the application materials, procedures and approval time limit, stating that a decision shall be made within forty-five days from the date of receiving the application materials and an express service operation license (the “**License**”) shall be issued where approved. Furthermore, an express company shall report to the postal administrations for record in the event of establishment, merger, division and removal of any of its branches.

The Measures further prescribe that the License is valid for five years and a new one shall be obtained upon expiry. Article 36 of the Measures state that companies which have gone through the relevant formalities to provide express services before the New Postal Law came into effective, shall try to satisfy the license conditions as set forth under the Measures within one year after the implementation of the same and obtain the License according to law. Where no license is obtained within the specified timeframe, they shall cease to engage in express services.

(3) Industry restrictions

Article 10 of the Measures restates the principle in the New Postal Law that foreign investors may not invest in domestic express business. It further clarifies that express companies, except postal enterprises, may not provide mail posting and delivering services, which shall be exclusively operated by postal enterprises, and may not deliver official documents.

3. Measures on the Administration of Releasing Radio and Television Advertisements (Author: Hongling NIU)

The State Administration of Radio, Film and Television (the “SARFT”) promulgated the Measures on the Administration of Releasing Radio and Television Advertisements (the “New Measures”) on September 10, 2009, which will be effective on January 1, 2010. The Temporary Measures on the Administration of Releasing Radio and Television Advertisements (the “Old Measures”) promulgated by the SARFT on September 15, 2003 will thereafter cease to be effective. Compared to the Old Measures, the New Measures made several changes in the following aspects:

- (1) Imposing clearer restrictions on the total volume of radio and television advertisements. Pursuant to the Old Measures, the volume of advertisements for every radio or television program should not exceed 20% of the total volume of the program for the day. In particular, for radio programs broadcasted from 11:00 to 13:00, and for television programs broadcasted from 19:00 to 21:00, the total length of advertisements in each program should not exceed 9 minutes per hour. The New Measures imposes further restrictions on the total volume of advertisements. According to the New Measures, the total length of commercial advertisements in each program should not exceed 12 minutes per hour. For radio programs broadcasted from 11:00 to 13:00, and television programs broadcasted from 19:00 to 21:00, the total length of commercial advertisements should not exceed 18 minutes per hour.
- (2) Imposing clearer restrictions on advertisements inserted during the broadcasting of television shows. The Old Measures provides that except for the time slot from 19:00 to 21:00, during the broadcasting of each television show (usually of a length of 45 minutes), advertisements not exceeding 2.5 minutes are allowed to be inserted only for one time. The New Measures provides that commercial advertisements are allowed to be inserted twice during the broadcasting of each

television show, and the length of each time should not exceed 1.5 minutes. In particular, shows broadcasted from 19:00 to 21:00 can be inserted commercial advertisements only for one time, the length of which should not exceed 1 minute. The New Measures further provide that viewers shall be advised of the length of a commercial advertisement.

- (3) Changing the requirement of the minimum volume of public service advertising. The Old Measures imposes a standard based on the total volume of advertisements in each program per day, and prescribes that the volume of public service advertisements should not be less than 3% of the total volume of advertisements each day. The New Measures' requirement is based on the length of commercial advertisements in each program per day, and provides that the length of public service advertisements should be no less than 3% of the length of commercial advertisements for each program per day.
- (4) Providing greater protection to minors. The New Measures provides that no alcoholic drink commercials are allowed to be released in radio frequencies, television channels, and programs that primarily target at minors. During student vacations or time slots when there are mass minor viewers or listeners, commercial advertisements that are not appropriate for minors to watch or listen are not allowed to be broadcasted.

4. The State Council Approved Notice Preventing Overcapacity and Duplicate Construction in Wind Power Equipment Industry (Author: Na CAI)

Background: wind power is a new industry encouraged by the State, and along with the fast development of this industry in China, there will be a steadily growing market for advanced and efficient wind power equipment. However, in recent years, there have been a mass of investments in the wind power equipment industry, and the duplicate imports and constructions are worth of attention. Currently there have been more than 80 enterprises that are engaged in the production of complete appliance of wind-powered electricity generating sets, and a lot of enterprises are still ready to enter into the wind power equipment manufacturing industry. Absent of timely regulation and control, overcapacity will be unavoidable.

On September 26,2009, the State Council approved and issued *the State Development and Reform Commission and other Departments' Notice of Several Issues Regarding Preventing Overcapacity and Duplicate Construction in Certain Industries and Guiding the Healthy Development of Industries* (the "**Notice**"). The Notice not only fully analyzes, inter alia, the current capacity of the wind power industry in China, but also clarifies the future direction of the industry policies for the same. Certain key policies are highlighted below:

(1) Prohibiting construction of new wind power complete appliance production plants and production projects

As a principle, the State will no longer approve or file for the construction of new complete appliance production plants; any provisions that require investors to use local wind power equipment and invest in local wind power equipment production projects are prohibited in wind power bidding projects.

(2) Raising the threshold for entering into the industry, and strengthening technology research and development

The State will establish and improve the standards, product inspection and certification system for wind

power equipment, and prohibits backward technology products and enterprises that do not meet the threshold from entering the market. Relying on strong enterprises and research institutions, the State will reinforce the technology research of wind power technology roadmap and sea wind power, focus its supports on the R&D of wind power complete appliance of 2.5MW or more and key parts such as bearings, control systems as well as industrial demonstration projects, and improve quality control systems.

(3) Enhancing the industry's competitiveness

The State will actively promote a large-scale and international industry of wind power equipment, and cultivate an internationally competitive wind power equipment production industry.

5. Implementing Rules for the Administrative Regulations on Commercial Performance (promulgated on September 3, 2009) (Author: Yeting CAI)

In order to meet the changing requirements of commercial performance administration and better implement the *Administrative Regulations on Commercial Performance* (Order No. 528 of the State Council, the “**Regulations**”), the Ministry of Culture revised and promulgated these new *Implementing Rules for the Administrative Regulations on Commercial Performance* (the “**New Implementing Rules**”) to replace the old rules issued in August 2005 (the “**Old Implementing Rules**”). The New Implementing Rules will become effective as of October 1, 2009 and the Old Implementing Rules will be abrogated therefrom.

The New Implementing Rules has 61 articles. It tightens the governmental supervision and administration over the commercial performance industry, further opening the performance market and broadening the financing channels so as to augment the strength of the performance industry. It further simplifies the examination and approval procedures, reducing the administrative costs and making things more convenient for the performance operators. In addition, it further regulates the business conduct, severely cracking down on illegal business activities so as to ensure the healthy and orderly development of the performance market. Set forth below is a detailed analysis on main articles revised by the New Implementing Rules for your reference.

(1) Revisions regarding “commercial performance operators”

(a) Specifying the definition of performance brokerage institutions

Performance brokerage institutions are commonly compared to salespersons who sell intellectual products. They lead social cultural consumption and play an important role in expanding performance market. Under the Old Implementing Rules, performance brokerage institutions are simply defined as “*business entities which undertake performance operation activities and brokerage activities*”. In order to better regulate various kinds of activities of performance brokerage institutions, Article 3 of the new Implementing Rules specify what constitutes “*operation activities*” and “*brokerage activities*” of a performance brokerage institution. In addition, brokerage activities such as performer's engagement, promotion and agency fall under the administration of performance market regulator(s). Henceforth, all entities engaging in performance brokerage business such as performer's engagement, promotion, agency and etc. shall apply for a commercial performance license according to the conditions and procedures prescribed in the Regulations and the New Implementing Rules.

(b) Relaxing the filing conditions of self-employed performers and self-employed performance brokers

In order to encourage self-employed performers and self-employed performance brokers to conduct business activities in accordance with law, Article 9.2 of the New Implementing Rules relaxes the filing conditions of self-employed performers and self-employed performance brokers. The Old Implementing Rules prescribed that self-employed performers and self-employed performance brokers shall obtain a business license from the competent administration of industry and commerce and file with the competent administration of culture. According to the new Implementing Rules, self-employed performers and self-employed performance brokers do not need to obtain any business licenses and can directly apply to the administration of culture at the county level in the place where their permanent residence is registered or where they habitually reside with their identification documents and art performance competence certificates(for self-employed performers) or their identification documents and performance brokers' qualification certificates (for self-employed performance brokers).

(c) Clarifying the procedures of establishment of a wholly-owned performance brokerage institution by investors of Hong Kong or Macao

The Old Implementing Rules only prescribed that performance brokerage institutions from the Hong Kong Special Administrative Region (“Hong Kong”) or Macao Special Administrative Region (“Macao”) may, upon approval, establish branches in the mainland, and that investors of Hong Kong or Macao may, upon approval, establish wholly-owned business entities of performance places, equity joint-venture or contractual joint-venture performance brokerage institutions or business entities of performance places in the mainland; however, the old rules are silent on the procedures of establishment of wholly-owned performance brokerage institutions by investors of Hong Kong or Macao. In order to provide good policy environment for capital from Hong Kong and Macao and to expand the mainland performance market, Article 14 of the New Implementing Rules clearly state that investors from Hong Kong or Macao may, upon approval, set up wholly-owned performance brokerage institutions.

(2) Revisions regarding “performance administration”

(a) Clarifying the quality acceptance procedures of stage or stand temporarily built up

With the prosperity of China's cultural market and the increase in performance activities in various cities of China, quality of the stage or stand temporarily built up has become a chief concern of the public. Article 19 of new Implementing Rules prescribes that where a commercial performance uses the stage or stand temporarily built up in compliance with the *Regulations on the Safety Administration of Large-scale Mass Activities*, the administration of culture at the county level shall strictly exam the acceptance certificate of the stage or stand submitted by the sponsoring entity of performance to protect the lives and property of the performers and audience.

(b) Removing restrictions on full-time performers of artistic-cultural performance groups and teachers or students of professional art colleges or universities to participate in commercial performance activities

The Old Implementing Rules stated that full-time performers of artistic-cultural performance groups or teachers or students of professional art colleges or universities shall not hold any commercial performance by themselves. where a full-time performer of an artistic-cultural performance group or any teacher or student of a professional art college or university is invited to participate in any commercial performance, or a full-time performer of an artistic-cultural performance group or any

teacher or student of a professional art college or university intends to participate in any commercial performance that is not sponsored by the group or college itself, he/she shall obtain consent from the same and enter into a contract. Where a foreign, Hong Kong or Macao artistic performer invited by a professional art college or university to engage in teaching and research activities needs to participate in any commercial performance activities on a temporary basis, approval from the Ministry of Culture or the administration of culture at the provincial level is required. To a certain extent, these provisions restricted the rational flow of performance resources, thus, the New Implementing Rules have removed the foregoing restrictions. Under the New Implementing Rules, full-time performers of artistic-cultural performance groups and teachers and students of professional art colleges or universities are allowed to participate in commercial performance beyond the performance activities scheduled by the group or their teaching and studying tasks. The New Implementing Rules further provide that where a foreign, Hong Kong or Macao artistic performer invited by a professional art college or university to engage in teaching and research activities needs to participate in any commercial performance activities, he/she shall only entrust a performance brokerage institution to handle the same and no approval from the competent culture administration authorities is required. These amendments not only promote the reasonable flow of performance resources but also increase the effective supply of performance resources.

(c) Simplifying approval procedures

Article 24 of the New Implementing Rules state that in the event of any foreign-related performance held in a singing and dancing (entertainment) place, tourist attraction, theme park, amusement park, hotel, restaurant, pub and any other place, approval from the administration of culture at the province level is required. Article 25 of the New Implementing Rules states that where any commercial performance activities involve performers from both the mainland and Hong Kong, Macao, Taiwan, applications with the administration of culture at the province level may be submitted in parallel. Article 22 of the New Implementing Rules state where a sponsoring unit intends to hold a foreign-related commercial perform event approved by the Ministry of Culture in a non-approved place within the approved timeframe, it shall file the same with the administration of culture at the province level in the new performance place. These simplified approval procedures bring more convenience to the performance operators.

(d) Clarifying administration over commercial performance under the disguise of television program recording activities

According to Zuhai Tuo, Deputy Director of Department of Cultural Markets of the Ministry of Culture, in recent years, a number of commercial performances have evaded governmental supervision under the disguise of television program recording activities, disrupting the order of the performance market. As such, with a view to building a fair and just performance market order, Article 26 of the New Implementing Rules prescribe that any on-site television program recording activities as prescribed by Article 2 of the New Implementing Rules shall be conducted through a performance brokerage institution and are subject to approval procedures under the Regulations and the New Implementing Rules.

(e) Tightening restrictions on lip-synching and fraudulent performance

Lip-synching and fraudulent performance violates professional ethics, infringe the legitimate rights of the audience and ruin the professional atmosphere. In order to forbid lip-synching and fraudulent performance, the New Implementing Rules perfect the relevant provisions specified in the Regulations by clearly defining the responsibilities of the performance sponsoring entity. The New Implementing Rules state that performance sponsoring entities shall assign people to supervise and record the singing and playing acts. Where no on-spot records are made, the sponsoring entity will be subject to a fine of

up to RMB3,000 by the administration of culture at the county level. The new rules further prescribe that the administration of culture may use technological measures to supervise the relevant performance activities, which provides legal basis for preventing lip-synching or fraudulent performance by using technological measures.

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