

	Penalties	Penalty Basis	Mitigating Factors
Shanghai Xinyi	Illegal gains confiscated: RMB 115.5 million Fine: RMB 50.3 million Total penalty: RMB 165.8 million	10% of 2023 revenue with 80% discount	(1) First whistleblower to this Cartel (2) Provide material evidence to Shanghai AMR (3) Acted as the ringleader – not eligible for full exemption
Henan Runhong	Illegal gains confiscated: RMB 15.2 million Fine: RMB 27.5 million Total penalty: RMB 42.7 million	4% of 2023 revenue	(1) Not the primary organiser; (2) Actively cooperated with investigation; (3) Voluntarily reduced NMI prices
Chengdu Huixin	Illegal gains confiscated: RMB 10.6 million Fine: RMB 3.8 million Total penalty: RMB 14.4 million	4% of 2023 revenue	(1) Not the primary organiser; (2) Actively cooperated with investigation; (3) Voluntarily reduced NMI prices
The GM	Fine: RMB 500,000	Personal liability can reach up to RMB 1 million	(1) Actively cooperated with investigation (2) Provided truthful statements and evidence

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