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March 21, 2025

Jiangsu Horizon Chain Supermarket Company Limited (the “Company”)

Shao Bo Town Industrial Park Logistics Park
Jiangdu District, Yangzhou City
Jiangsu Province, The PRC

**Red Solar Capital Limited
(the “Sole Sponsor”)**

402B, 4/F China Insurance Group Building
141 Des Voeux Road Central
Central, Hong Kong

Red Solar Capital Limited

402B, 4/F China Insurance Group Building
141 Des Voeux Road Central
Central, Hong Kong

CMBC Securities Company Limited

45/F, One Exchange Square
8 Connaught Place
Central, Hong Kong

(collectively, the “**Joint Overall Coordinators**” (for themselves and on behalf of the Underwriters (as defined in the Company’s prospectus dated 21 March 2025 (the “**Prospectus**”))))

Red Solar Capital Limited

402B, 4/F China Insurance Group Building
141 Des Voeux Road Central
Central, Hong Kong

CMBC Securities Company Limited

45/F, One Exchange Square
8 Connaught Place
Central, Hong Kong

CCB International Capital Limited

12/F, CCB Tower
3 Connaught Road Central
Central, Hong Kong

(collectively, the “**Joint Global Coordinators**” (for themselves and on behalf of the Underwriters (as defined in the Prospectus)))

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For the United States offices, a limited liability partnership including professional corporations. For Hong Kong office, a limited liability partnership.



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United States Legal Opinion

Dear Sir or Madam:

**PROPOSED LISTING OF JIANGSU HORIZON CHAIN SUPERMARKET COMPANY LIMITED
ON THE MAIN BOARD OF THE STOCK EXCHANGE OF HONG KONG LIMITED BY WAY OF
GLOBAL OFFERING**

We have acted as United States special counsel to Jiangsu Horizon Chain Supermarket Company Limited (the “**Company**”, together with its subsidiaries, the “**Group**”), a joint stock company incorporated in the People’s Republic of China (“**PRC**”) with limited liability, in connection with the initial public offering and listing of securities of the Company on the Main Board of The Stock Exchange of Hong Kong Limited (the “**Stock Exchange**”). We set out below the information, opinions and conclusions in respect of (i) Jiangsu Hongxin Trading Co., Ltd.¹ (江蘇宏信商貿股份有限公司) (formerly known as Jiangdu Mall Co., Ltd.² (江都商城股份有限公司), a joint stock company with limited liability established under the laws of the PRC and a subsidiary of the Company (the “**PRC Co**”), and (ii) Jiangsu Horizon (Hong Kong) Co., Limited (the “**HK Co**”, together with the PRC Co, the “**Target Companies**”), a Hong Kong company and a subsidiary of the Company. We were given to understand that (a) the Group, through the PRC Co, operates certain export business from the PRC to the U.S. (the “**Export Arrangement**”), (b) the HK Co acts as an agent of/for the PRC Co and United International (Yangzhou) Garments Factory Co., Ltd. (“**United International**”) for the receipt of proceeds from their respective sales to the U.S. customers, and (c) the HK Co acts as an agent of/for the PRC Co in executing sales contracts with the PRC Co’s U.S. customers ((b) and (c) together, the “**Agency Arrangement**”).

In connection with giving the opinions and conclusions set forth herein, we have examined, for such purposes, copies of documents and records of the Target Companies that the Group has provided to us, including, without limitation, the Group’s answers to our due diligence questionnaire or email correspondence, the documents set forth on Schedule A, certain publicly available searches, as well as any other documents referenced herein.

We have also investigated such questions of law and made such inquiries of officers and representatives of the Group as we have deemed relevant or necessary, to render the opinions set forth below. We have not undertaken any independent investigation to determine the existence or nonexistence of other facts, and no inference as to our knowledge of the existence or nonexistence of other facts should be drawn from our representation of the Company. Except as expressly set forth herein, we have not received any records of the Group relating to matters to which the Target Companies or the Company may be a party.

In connection with our examination and in rendering the opinions expressed below, we have assumed, with your approval and without any independent investigation, (i) all factual information provided to us are true and accurate and there is no related information that was omitted, (ii) the genuineness of signatures on all documents, (iii) the legal capacity of natural persons, and (iv) the conformity to original documents of all copies submitted to us as certified, conformed,

¹ For identification purpose only

² For identification purpose only



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photographic or telecopied copies. We have also accepted as true and without investigation, information received and documents from government agencies and industry/trade associations.

Based on the foregoing, and to our knowledge, based on the information the Group has provided to us (including, without limitation, the Group's answers to our due diligence questionnaire), and subject to any other qualifications and exceptions stated below, we are of the opinion that:

- (1) Based solely on our review of the sales contracts provided by the Group (whether issued in the name of HK Co or PRC Co and whether the sales thereunder constituted part of the Group's export business), the sales contracts are not governed by U.S. laws, and any disputes arising from the sales contracts are subject to the arbitration in the PRC, which may be enforceable under the Federal Arbitration Act (FAA) and international treaties.
- (2) We screened the names of the PRC Co, the HK Co and United International through the U.S. Office of Foreign Assets Control's sanctions list search and none of the names was direct hit on such list.
- (3) There are no requirements for licenses, permits, approvals, consents, certificates or registrations applicable to (i) the Group's sales to the U.S., and (ii) the Agency Arrangement. The Agency Arrangement is not mandated to be formally documented under relevant U.S. laws.
- (4) The Group mainly sold the following products to its U.S. customers. If such products are to be shipped from or originated from the PRC and be entered the U.S. on or after March 4, 2025, the Group will be subject to U.S. tariffs ranging from a total of approximately 34.6% to 59.5%.

Product HTS Code	Product Name
6202.40.7000	ladies jkt woven 100% polyester water resistant
6210.50.5555	ladies jkt woven 100% polyester with visible coating
6210.50.5555	ladies vest woven 100% poly w/visible coating
6102.30.2010	ladies knitted jacket 90%polyester;10%spandex
6201.40.7000	mens jkt woven 100% polyester water resistant
6210.40.5550	mens jacket woven 100% polyester visible coating
6210.40.5550	mens vest woven 100% polyester visible coating
6101.30.2010	men knitted jacket 100% polyester
6109.90.1007	mens knitted t-shirts 90%polyester;10%spandex
6109.90.1007	mens knitted t-shirts 83%polyester;17%spandex

- (5) Based on the fact that all of the Group's products to its U.S. customers were sold on free-on-board basis and such U.S. customers assumed full responsibility as importers of record, the Group is not responsible for payment of any tariffs.
- (6) The Group's sales to the U.S. and the Agency Arrangement are not subject to any tariff, quotas, embargoes, sanctions and/or anti-dumping and countervailing duties.



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- (7) The Group's sales to the U.S. and the Agency Arrangement do not violate the relevant applicable U.S. laws and regulations in all material aspects, including, but not limited to, customs and border protection regulations, Consumer Product Safety Commission standards, Federal Trade Commission regulations, and Environmental Protection Agency regulations, and not subject to U.S. tax (including federal and state taxes and duties).

The foregoing opinions and conclusions are subject to the following exceptions and qualifications:

We rely solely on the product descriptions and HTS codes provided by the Company. We have not independently verified and do not express any opinions on the accuracy or appropriateness of the HTS classifications assigned to the products in question.

As used herein, the expression "to our knowledge" refers to current actual knowledge of the attorneys of this firm representing the Company in connection with the proposed listing and without any independent investigation of underlying facts or situations.

We have not examined and we do not express any opinions herein concerning any laws other than the laws of United States, and we express no opinion as to the extent to which the laws of any jurisdiction other than those identified above are applicable to the subject matter hereof.

The opinions expressed herein deal only with the specified legal issues expressly addressed herein, and you should not infer any opinion that is not explicitly addressed herein from any matter stated in this opinion letter. This opinion letter is predicated solely upon laws in existence and facts as we know them as of the date hereof and is limited to the matters expressly stated herein, and no opinion is implied or may be inferred beyond the matters expressly stated herein. We expressly disclaim any obligation to update this opinion after the date hereof for any reason, including but not limited to, any new or changed facts or law which come to our attention after the date hereof.

Nothing in this opinion should be interpreted as expressing any opinion as of any date later than the date of this opinion. This opinion is furnished to you solely for your benefit and only in connection with the proposed listing.

This opinion will not be used, disclosed, relied upon or otherwise referred to by any other person, copied, reproduced, quoted, disseminated or made available to any other person or entity other than (i) the Stock Exchange, the Securities and Futures Commission and or any other regulatory authority in Hong Kong; (ii) to any governmental authority having regulatory jurisdiction over you; (iii) the affiliates, legal and other professional advisers to the addressees above; or (iv) pursuant to an order, judgment, decision or legal process of any court or governmental authority of competent jurisdiction or other authority with relevant powers, without our prior written consent.



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Sincerely yours,

Loeb & Loeb LLP

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Schedule A

In connection with giving this opinion, we have examined copies of documents and records provided by the Company, including the following documents:

- (a) Officer's Certificate dated March 21, 2025
- (b) Sales Contract (No. 20FHHR001) dated May 10, 2020 between Jiangsu Horizon (Hong Kong) Co., Limited and Free Country, Ltd.
- (c) Sales Contract (No. 21FHFL001) dated March 20, 2021 between Jiangsu Horizon (Hong Kong) Co., Limited and Free Country, Ltd.
- (d) Sales Contract (No. 20SUHR001) dated March 20, 2020 between Jiangsu Horizon (Hong Kong) Co., Limited and Fieldston Clothes Inc.
- (e) Sales Contract (No. 21SUHR001) dated February 26, 2021 between Jiangsu Horizon (Hong Kong) Co., Limited and Fieldston Clothes Inc.
- (f) Sales Contract (No. 22SUHR001) dated March 19, 2022 between Jiangsu Horizon (Hong Kong) Co., Limited and Fieldston Clothes Inc.
- (g) Sales Contract (No. 22FHHR019) dated April 6, 2022 between Jiangsu Horizon (Hong Kong) Co., Limited and Free Country, Ltd.
- (h) Bill of Lading (No. UXMNE2022060555) dated June 1, 2022 between Jiangsu Horizon (Hong Kong) Co., Limited (Shipper) and Free Country Ltd. (Consignee)
- (i) People's Republic of China Customs Declaration for Exported Goods (No. E20220000865422379/310120220517444768) dated June 26 2022 filed by Jiangsu Horizon (Hong Kong) Co., Limited.
- (j) A total of four industrial mining products purchase contracts, all between United International (Yangzhou) Garments Factory Co., Ltd. as the seller and Jiangsu Horizon Trade Co., Ltd. as the purchaser and executed throughout the year of 2019.
- (k) A total of 81 industrial mining products purchase contracts, all between United International (Yangzhou) Garments Factory Co., Ltd. as the seller and Jiangsu Horizon Trade Co., Ltd. as the purchaser and executed throughout the year of 2020.
- (l) A total of 59 industrial mining products purchase contracts, all between United International (Yangzhou) Garments Factory Co., Ltd. as the seller and Jiangsu Horizon Trade Co., Ltd. as the purchaser and executed throughout the year of 2021.
- (m) A total of 101 industrial mining products purchase contracts, all between Jiangsu Hanson Dream Artificial Intelligence Technology Co. (江苏汉胜梦人工智能科技有限公司) as the seller and Jiangsu Horizon Trade Co., Ltd. as the purchasers and executed throughout the year of 2021.
- (n) A total of 28 industrial mining products purchase contracts, all between United International (Yangzhou) Garments Factory Co., Ltd. as the seller and Jiangsu Horizon Trade Co., Ltd. as the purchaser and executed throughout the year of 2022
- (o) A total of 69 industrial mining products purchase contracts, all between Jiangsu Hanson Dream Artificial Intelligence Technology Co. (江苏汉胜梦人工智能科技有限

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- 公司) as the seller and Jiangsu Horizon Trade Co., Ltd. as the purchaser and executed throughout the year of 2022.
- (p) A total of 97 sales contracts, all between Jiangsu Horizon (Hong Kong) Co., Limited as the seller and Free Country, Ltd. as the purchaser and executed throughout the year of 2022.
 - (q) A total of 99 People's Republic of China Customs Declaration for Exported Goods of Jiangsu Horizon (Hong Kong) Co., Limited executed throughout the year of 2022.
 - (r) A total of 28 industrial mining products purchase contracts, all between Shanghai Shengnuo Industry Co. (上海胜诺实业有限公司) as the seller and Jiangsu Horizon Trade Co., Ltd. as the purchaser and executed throughout the year of 2023.
 - (s) A total of 36 industrial mining products purchase contracts, all between United International (Yangzhou) Garments Factory Co., Ltd. as the seller and Jiangsu Horizon Trade Co., Ltd. as the purchaser and executed throughout the year of 2023.
 - (t) A total of 20 industrial mining products purchase contracts, all between Jiangsu Hanson Dream Artificial Intelligence Technology Co. (江苏汉胜梦人工智能科技有限公司) as the seller and Jiangsu Horizon Trade Co., Ltd. as the purchaser and executed throughout the year of 2023.
 - (u) A total of 84 sales contracts, all between Jiangsu Horizon (Hong Kong) Co., Limited as the seller and Free Country, Ltd. as the purchaser and executed throughout the year of 2023.
 - (v) A total of 84 People's Republic of China Customs Declaration for Exported Goods of Jiangsu Horizon (Hong Kong) Co., Limited executed throughout the year of 2023.
 - (w) A total of 16 invoices, all between Sea Sky Global Logistics Inc. and Jiangsu Horizon (Hong Kong) Co., Limited and executed throughout the year of 2020.
 - (x) A total of 15 invoices, all between Sea Sky Global Logistics Inc. and Jiangsu Horizon (Hong Kong) Co., Limited and executed throughout the year of 2021.
 - (y) A total of 18 invoices, all between Sea Sky Global Logistics Inc. and Jiangsu Horizon (Hong Kong) Co., Limited and executed throughout the year of 2022.
 - (z) A total of 4 invoices, all between Sea Sky Global Logistics Inc. and Jiangsu Horizon (Hong Kong) Co., Limited and executed throughout the year of 2023.
 - (aa) Merchandise import and export collection and payment agreement dated November 27, 2017 between Jiangsu Horizon Trading Co. and Jiangsu Horizon (Hong Kong) Co., Limited.
 - (bb) Merchandise import and export collection and payment agreement dated December 1, 2018 between United International (Yangzhou) Garments Factory Co., Ltd. and Jiangsu Horizon (Hong Kong) Co., Limited.
 - (cc) Commission Confirmation Letter dated January 15, 2023 between United International (Yangzhou) Garments Factory Co., Ltd. and Jiangsu Horizon (Hong Kong) Co., Limited.