

October 20, 2025

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Guotai Junan Securities (Hong Kong) Limited
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Re: Legal Opinion

Ladies and Gentlemen:

We have acted as special counsel for CIG Shanghai Co., Ltd. (the "Company"), in connection with the review of the business operations of the Company's two subsidiaries in the United States ("U.S."). More specifically, we are engaged to provide this opinion letter addressing certain corporate legal matters of the two subsidiaries: Cambridge Industries USA Inc., a Delaware corporation ("CIG USA") and Actiontec Electronics, Inc., a Delaware corporation ("Actiontec", together with CIG USA, collectively the "Subsidiaries", and each a "Subsidiary").

In connection with this opinion, we have examined the following documents:

- (a) A copy of the Certificate of Incorporation of each Subsidiary (the "Certificate of Incorporation") obtained from the Secretary of State of Delaware, and which each has been certified by an officer of such Subsidiary, as of February 28, 2025 as the true and correct Certificate of Incorporation of such Subsidiary, and with your permission, we have relied on these Certificates of Incorporation as certified by officers of the Subsidiaries,

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- (b) a certificate of status of each Subsidiary dated February 28, 2025 from the Secretary of State of the State of Delaware (the “Certificate of Status”) as to the valid existence and good standing of such Subsidiary,
- (c) a Certificate of Officer of each Subsidiary dated of even date hereof (the “Certificate of Officer”),
- (d) a copy of the Bylaws of each Subsidiary, and
- (e) such other corporate records and documents as we have deemed appropriate for purposes of the opinion expressed below.

Except as otherwise expressly indicated herein, we have not undertaken any independent investigation of factual matters.

In our examination of the aforesaid documents and in rendering the opinions set forth below, we have assumed, without independent investigation or examination, the genuineness of all signatures, the legal capacity of all natural persons to execute and deliver documents, the authenticity and completeness of all documents submitted to us as originals, and the completeness and conformity to original documents of all documents submitted to us as certified or photoduplicated copies and the authenticity of the originals of such latter documents.

Upon the basis of the foregoing, we are of the opinion that:

1. CIG USA (a) was incorporated as a legal entity in the State of Delaware on April 26, 2010 by the filing of the Certificate of Incorporation; (b) is a corporation validly existing and in good standing under the laws of the State of Delaware; (c) has all requisite power and authority to sue and be sued, and to carry on its business as now conducted in connection with its authorized purpose as provided in its Certificate of Incorporation; and (d) has adopted a set of bylaws that govern the operations of the company and such bylaws comply with the Delaware General Corporation Law (the “Act”).
2. Actiontec (a) was incorporated as a legal entity in the State of Delaware on October 21, 2020 by filing of the Certificate of Incorporation; (b) is a corporation validly existing and in good standing under the laws of the State of Delaware; (c) has all requisite power and authority to sue and be sued, and to carry on its business as now conducted in connection with its authorized purpose as provided in its

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Certificate of Incorporation; and (d) has adopted a set of bylaws that govern the operations of the company and such bylaws comply with the Act.

3. CIG USA has authorized 1,000 shares, of which, 1,000 have been issued and outstanding, fully paid and non-assessable (the “CIG USA Shares”). All of such CIG USA Shares are currently held of record by the Company. CIG USA’s Certificate of Incorporation does not provide for preemptive rights.
4. Actiontec has authorized 1,000 shares, of which, 1,000 has been issued and outstanding, fully paid and non-assessable (the “Actiontec Shares”). All of such Actiontec Shares are currently held of record by CIG USA. Actiontec’s Certificate of Incorporation does not provide for preemptive rights.
5. CIG USA has a sole director Mr. Gerald G. Wong, who has also been the Chief Executive Officer and Treasurer of CIG USA since at least May 10, 2022.
6. Actiontec has a sole director, Mr. Gerald G. Wong, who has also been the Chairman of Actiontec since at least February 1, 2022.
7. Neither the Certificate of Incorporation nor the Bylaws of CIG USA impose any restriction on declaring and paying dividend or other distribution of CIG USA.
8. Neither the Certificate of Incorporation nor the Bylaws of Actiontec impose any restriction on declaring and paying dividend or other distribution of Actiontec.

With your approval and without independent investigation, in rendering the opinions set forth herein we have relied upon and assumed the accuracy of the factual matters described in each of the Certificate of Officer. We have also assumed that there are no other facts, conditions or circumstances that conflict with or are inconsistent with any of the foregoing. With respect to such matters, we have not made any independent investigation or verification of the information contained therein for purposes of this opinion letter. However, we have no actual knowledge of any facts that would indicate that our assumptions are invalid. Further, our opinion expressed above in subparagraphs 1 and 2 with respect to the Subsidiaries’ existence and good standing is based solely on the Certificates of Incorporation and the Certificates of Status, and our opinion expressed in subparagraphs 3 through 8 with respect to the shares, the officers and directors of the Subsidiaries and the dividends or other distribution declarations and payments is based solely on our review of all the corporate records provided to us.

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In connection herewith, we have assumed that, all of the documents referred to in this opinion letter have been duly authorized by, have been duly executed and delivered by, and constitute the valid, binding and enforceable obligations of, all of the parties to such documents, all of the signatories to such documents have been duly authorized and all such parties are duly organized and validly existing and have the power and authority (corporate or other) to execute, deliver and perform such documents.

In connection with the opinions expressed herein, we express no opinion as to the laws of any jurisdiction other than (i) the corporate laws of the State of Delaware, and (ii) the federal laws of the United States of America. We express no opinion herein as to compliance by the Subsidiaries with the so-called “blue sky” laws of any state or political subdivision of the United States of America or with respect to other laws not generally addressed by a letter of this nature, such as tax, securities, employee benefits, or local laws or ordinances. We express no opinion as to any consent, approval, permit, waiver, license, authorization, filing, notification or registration that may be required for the Subsidiaries to conduct its business.

We express no opinion as to the effects of (i) bankruptcy, insolvency, fraudulent transfer and conveyance, reorganization, moratorium and similar laws affecting creditors’ rights and remedies generally, and (ii) general principles of equity (regardless of whether enforcement is sought in a proceeding at law or in equity) including the possible unavailability of specific performance or injunctive relief and the exercise of discretionary powers by any court before which specific performance or injunctive relief or other equitable remedies may be sought.

This opinion is rendered based upon our interpretation of existing law, and is not intended to speak with reference to standards hereafter adopted in subsequent judicial decisions by courts or to laws, rules or regulations hereafter enacted or adopted. Additionally, the opinions expressed herein are as of the date hereof, and we assume no obligation to update or supplement such opinions to reflect any facts or circumstances that may hereafter come to our attention or any changes in law that may occur hereafter.

We bring to your attention the fact that our legal opinions are expressions of professional judgment and not a guarantee of a result.

This opinion is given as of the date hereof and we assume no obligation to update or supplement such opinion to reflect any facts or circumstances that may hereafter come to our attention or any changes that may hereafter occur. This opinion is being furnished to you per your request in connection with “due diligence” for a potential public offering of the Company on the Hong Kong Stock Exchange (SEHK) (the “Listing”) and may not be quoted or referred to in any other document or filed with any government agency or relied upon by you for any other purpose

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or relied upon by any other person except (i) to the extent necessary for the purpose of the proposed Listing, the inclusion of this opinion in the prospectus, and the display of this legal opinion on the SEHK and the Company's website, or (ii) relied upon by the Company, Guotai Junan Capital Limited and Guotai Junan Securities (Hong Kong) Limited without our prior written consent.

Very truly yours,

Thompson Hine LLP

THOMPSON HINE LLP
