

Exhibit 1

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE VNET GROUP, INC. SECURITIES
LITIGATION

Case No. 1:23-cv-11187-DEH

CLASS ACTION

Hon. Dale E. Ho

DECLARATION OF WONG TAN

I, Wong Tan, declare the following:

1. I am the lead plaintiff in the above-captioned matter. I submit this Declaration in support of: (i) Plaintiffs' Unopposed Motion for Final Approval of Class Action Settlement and (ii) Plaintiffs' Motion for an Award of Attorneys' Fees, Reimbursement of Litigation Expenses, and Compensatory Award for Plaintiffs, including the request that I receive an award of \$15,000. I have personal knowledge of the facts described herein and would testify to those facts if called to do so.

2. I have been involved in this Action since submitting a certification and moving for appointment as a lead plaintiff in February 2024. During that time, I have worked with lead counsel Pomerantz LLP ("Counsel") on all aspects of this litigation to monitor and contribute to the successful prosecution of this Action, and received regular updates from Counsel on case developments. I always made myself available to Counsel and was regularly updated about this litigation and its developments. The various tasks I performed included:

- a. Analyzing whether to participate as a representative plaintiff, including review of initiating documents, consideration of damage estimates, and

consultation with Counsel regarding the responsibilities of serving as a representative plaintiff;

- b. Reviewing and discussing with Counsel the lead plaintiff moving papers;
- c. Gathering case-related documents as requested by Counsel;
- d. Reviewing and discussing with Counsel an amended complaint, including discussing the strategy to add claims in the amended complaint;
- e. Reviewing and discussing the motion to dismiss filed by Defendants and the response in opposition to the motion to dismiss filed by Counsel;
- f. Participating in the discovery process, including by working with Counsel to respond to Defendants' document requests and interrogatories;
- g. Discussing settlement authority, settlement negotiations, and the Settlement with Counsel;
- h. Discussing the motions for preliminary approval and final approval with Counsel; and
- i. Consulting with Counsel regarding the anticipated relief to be sought in: (i) Plaintiffs' Unopposed Motion for Final Approval of Class Action Settlement and (ii) Plaintiffs' Motion for an Award of Attorneys' Fees, Reimbursement of Litigation Expenses, and Compensatory Award for Plaintiffs.

3. I have done my best to promote the interests of the Class and to obtain the best recovery possible under the circumstances.

4. I understand that reimbursement of a lead plaintiff's reasonable costs and expenses is authorized under the PSLRA. I expended more than fifty (50) hours performing all of the work identified above in this Action for the direct benefit of the Class, diverting time that could have

otherwise been used for cash-generating activities, including my primary business of operating investment companies in the packaging industry. I estimate that the value of such time far exceeds \$15,000.

5. While I understand that the ultimate determination of Counsel's request for an award of attorneys' fees and litigation expenses rests with the Court, I note that the request of 33 1/3% of the Settlement Amount is consistent with the retainer agreement I signed in connection with this litigation, and I believe that amount is fair and reasonable in light of the work performed on behalf of the Class, and the result achieved.

6. In conclusion, I endorse the Settlement as fair, reasonable, and adequate, and believe that the Settlement represents a significant recovery for the Class. Accordingly, I respectfully request that the Court approve: (i) Plaintiffs' Unopposed Motion for Final Approval of Class Action Settlement and (ii) Plaintiffs' Motion for an Award of Attorneys' Fees, Reimbursement of Litigation Expenses, and Compensatory Award for Plaintiffs.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed this 25th day of June, 2026

/s/ Wong Tan
Wong Tan