

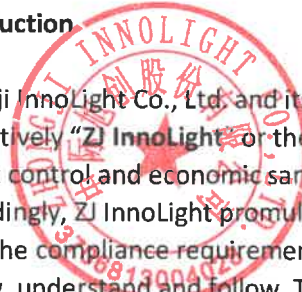


**Zhongji InnoLight Co., Ltd.**

**2024 Trade Control Compliance Policy**

(Last Updated: 22<sup>nd</sup> May 2024)

**1. Introduction**



Zhongji InnoLight Co., Ltd. and its majority owned or controlled subsidiaries and affiliates (collectively “ZJ InnoLight” or the “Company”) are committed to compliance with all applicable export control and economic sanctions laws and regulations (collectively “Trade Control Law”). Accordingly, ZJ InnoLight promulgates this Trade Control Compliance Policy (the “Policy”), setting forth the compliance requirements that all ZJ InnoLight employees (“ZJ InnoLight Personnel”) must review, understand and follow. This Policy applies to ZJ InnoLight and all ZJ InnoLight Personnel. It is the responsibility of each ZJ InnoLight Personnel to fully support the Company’s compliance efforts.

**2. Policy Overview**

The Trade Control Law includes applicable export control and economic sanctions laws and regulations administered by the authorities of United Nations, European Union, the United States, the People’s Republic of China, and other jurisdictions where ZJ InnoLight operates in. The Trade Control Law imposes export restrictions on the export, reexport or transfer of certain commodities, software, technology and the provision of services (collectively, “Controlled Items”) for national security and foreign policy reasons. Controlled Items include Items for military use, “dual-use” Items with both commercial and military applications, and Items for other restricted end uses, such as nuclear, chemical or biological weapons, or missile technology. The U.S., EU and other certain jurisdictions also impose territorial sanctions against designated countries and regions, as well as targeted restrictions against designated governments, companies, and individuals who have been placed on various restricted party lists under the Trade Control Law (“Restricted Party”).

As ZJ InnoLight engages in business activities that involve items subject to applicable Trade Control Law, it is important that ZJ InnoLight Personnel are aware of, understand and comply with the Trade Control Law.

This Policy helps each ZJ InnoLight Personnel understand how Trade Control Laws impact our day-to-day work and provides guidance for complying with these laws and regulations.

**3. Key Policy Principles**

This Policy requires ZJ InnoLight Personnel to comply with the following obligations and principles.

- No transactions are to be conducted by or on behalf of ZJ InnoLight contrary to applicable Trade Control Law.



- No business dealings, directly or indirectly, with any parties located, headquartered, registered in certain restricted countries or regions that are subject to comprehensive territorial or other sanctions (“**Restricted Countries/Regions**”). Currently, Iran, Syria, North Korea, Cuba, Russia, Belarus, Crimea region, Donetsk People’s Republic region, Luhansk People’s Republic region are Restricted Countries/Regions.
- Any business dealings, directly or indirectly, with any parties located, headquartered, registered in certain high risk countries (“**High Risk Countries**”) must be reviewed by the Trade Compliance Director in advance. Currently, Myanmar, Venezuela, Yemen and Nicaragua are High Risk Countries.
- No business dealings, directly or indirectly, with any Restricted Party of the following lists, to the extent such business is legally prohibited by the applicable Trade Control Law or lacks required authorization or licensing.
  - i. Denied Person List, Entity List, Unverified List, Military End User List and Military Intelligence End User List of the Bureau of Industry and Security of U.S. Commerce Department;
  - ii. Specially Designated Nationals and Blocked Persons List (SDN), Foreign Sanctions Evaders List, Non-SDN Menu-Based Sanctions List, Sectoral Sanctions Identifications (SSI) of the Office of Foreign Asset Control of U.S. Treasury Department, as well as any party owned (50% or more), directly or indirectly, individually or in the aggregate by any party listed in SDN and SSI;
  - iii. European Union Consolidated List of Financial Sanctions published by the European Commission, Annex IV and Annex XIX of the Council Regulation (EU) No 833/2014 (“EU Russia Sanctions Regulation”), Annex V of the Council Regulation (EC) No 765/2006 (“EU Belarus Sanctions Regulations), any list of sanctioned persons issued by EU Member States; the Consolidated List of Financial Sanctions Targets in the UK published by the Office of Financial Sanctions Implementation HM Treasury;
  - iv. Any party owned (50% or more) or controlled by, directly or indirectly, individually or in the aggregate, or acting for the interest of entities or individuals listed in item iii above;
  - v. Unreliable Entity List maintained by the Ministry of Commerce of the PRC and individuals and entities sanctioned by the Ministry of Foreign Affairs of the PRC pursuant to Anti-foreign Sanctions Law.
  - vi. Other Restricted Party List as applicable, amended, supplemented or substituted from time to time pursuant to Trade Control Law.
- Not knowingly export, reexport or transfer ZJ InnoLight’s Items for any prohibited end user or end use under applicable Trade Control Law.
- Complete an employee compliance certification regarding compliance with applicable Trade Control Law, this Policy as well as procedures promulgated by the Company to ensure compliance.

- Understand how Trade Control Law applies to the work you do, participate in and complete all required compliance trainings. ZJ InnoLight Personnel with export responsibilities are required to have a working knowledge of Trade Control Law, especially those governing their specific job functions, as well as working knowledge of ZJ InnoLight's trade control compliance policies and procedures.
- Before any export, reexport, transfer of ZJ InnoLight's Items or third party Items, proper due diligence and screening required in accordance with the relevant corporate procedures must be conducted and documented to ensure that no prior authorization or license is required from any government authority. To the extent a prior export authorization is required, ZJ InnoLight shall not proceed with such transaction without first obtaining the appropriate authorization.
- Before any provision of service, repair, return or maintenance support of ZJ InnoLight's Items, proper due diligence and screening must be conducted in advance and documented in accordance with applicable corporate procedures to ensure such aftersales activities may be lawfully performed under Trade Control Law.
- Before engaging in research and development projects, including intra-company activities, personnel must comply with Trade Control Law, such as in the procurement and use of software, technology and equipment.
- When procuring Items from suppliers, it is important to obtain export jurisdiction and export classification information about such Items. For example, if procured Items are subject to the U.S. Export Administration Regulations ("EAR"), ZJ InnoLight must obtain the Export Control Classification Number ("ECCN") related to any such commodity, technology, or software. The EAR generally applies to the future transfer of such EAR Items.
- Take steps to record accurate and complete information related to export activities in your daily work operation, and maintain such records in the proper locations pursuant to the corporate procedures. ZJ InnoLight retains all export-related records for at least 5 years since the date of export activities.
- Be alert to circumstances or signs indicating ZJ InnoLight Items may be destined for an inappropriate destination, end use or end user (collectively "Red Flags"). Exercise due diligence in inquiring about Red Flags and/or escalate such situation to the Legal Department or trade compliance personnel for awareness before taking further action.
- Report any actual or potential compliance issues or violations to the dedicated compliance reporting channel at [trade.compliance@innolight.com](mailto:trade.compliance@innolight.com), if you suspect or become aware of any non-compliance action by ZJ InnoLight Personnel.



Violations of the Trade Control Law may result in significant consequences for ZJ InnoLight and responsible individuals, including criminal and/or civil fines, being designated as a restricted party under Trade Control Law as well as damage to ZJ InnoLight's and the individual's reputation. Anyone found to be in violation of the Trade Control Law or the Policy will be subject to significant disciplinary actions by the Company, up to and including termination.

#### 4. ZJ InnoLight's Commitment to Trade Control Compliance and Expectation of Business Partners

ZJ InnoLight is dedicated to providing substantial resources, time, investment and personnel to ensure its compliance with Trade Control Law and the implementation of an effective trade compliance program throughout its global business operations. ZJ InnoLight management fully supports the compliance efforts. The Company has implemented relevant compliance control measures and will continuously work to enhance its trade compliance program.

This Policy will be communicated to ZJ InnoLight's customers, suppliers and other business partners, such as contractors, consultants, freight forwarders, distributors, sales representatives or any party having business dealings with ZJ InnoLight (collectively, "**Business Partners**"). ZJ InnoLight expects and seeks strong support of its Business Partner to not only maintain compliance with applicable Trade Control Law for business dealings with ZJ InnoLight, but also cooperate with ZJ InnoLight to provide us with export control information (including export control classification, end user and end use information) specific to any Items supplied to or received from ZJ InnoLight. From time to time, ZJ InnoLight may send communications on important trade regulatory developments to provide our Business Partners with additional knowledge and increase awareness on trade control compliance.

If you have any questions concerning this Policy, please contact trade compliance personnel listed in the appendix.

中际旭创股份有限公司

**Appendix – Trade Compliance Points of Contact**

Title	Name	Department
Legal Director (Acting Trade Compliance Director)	Pengfei (Jeff) Lin	Legal Department
BU Compliance Support Personnel	Lixia (Alice) Wan	Legal Department
	Fangda (Boris) Liu	
	Xiaoming (Michael) Xu	R&D Department
	Yong Gou	Procurement Department
	Fan (Monica) Zhao	Manufacturing Department
	Defeng (Ivan) Zheng	Product Management Department
	Chao (Tracy) Gao	Sales Department
	Li (Cherry) Zhang	
	Chaoying (Fiona) Shen	Internal Control Department
	Wenya Jiang	Finance Department
	Shuai (Dora) Yi	Securities Department
	Gang (Kern) Wang	Customs Declaration Department
	Chuanying (Sabrina) Zhang	Branding Department
	Fei (Fay) Shen	HR Department
	Tingting (Tiny) Yang	
Dan (Sylvie) Chen	Research Institute	
Yu Fan	IT Department	
Ying (Athena) Xu	General Manager Office	
	Hai Ding	Jiangsu Zhichi Zhiyuan Holdings Co., Ltd.

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BU Compliance Point of Contact at ZJ InnoLight core subsidiaries/affiliates	Caiyun (Tingky) Chen	Chengdu Tsuhan Science and Technology Co., Ltd.
	Hongping Cheng	Chongqing Junge Electronic Technology Co., Ltd.
	Pan Wang	InnoLight Technology (Tongling) Co., Ltd.
	Yuzhou (Oliver) Sun	Suzhou Paixi Technology Co., Ltd.
	Sheng Liu	InnoLight Technology Pte. Limited
	Osa Mok	InnoLight Technology USA, Inc.
	Weilong (Bill) Lee	InnoLight Technology Pte. Limited Taiwan Branch
	Pan Wang	InnoLight Technology (Thailand) Company Limited

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