

To: All Respected Business Partners of InnoLight

致：旭创科技尊敬的合作伙伴

From: InnoLight Technology (SUZHOU) LTD.

自：苏州旭创科技有限公司

关于：致业务合作伙伴关于贸易合规的信函

RE : Trade Compliance Letter to Business Partners

遵守全球范围内包括中国、美国、欧盟在内的所有适用的出口管制和经济制裁法律法规是苏州旭创科技有限公司及其各子公司和分支机构（以下统称“旭创”或者“我方”）的一项基本合规政策。旭创承诺遵守全球所有适用的出口管制和经济制裁法律法规，并贯彻执行所有与实物、软件（包括源代码）、技术（统称“物项”）的出口、再出口及转移（一国内）相关的要求。

Complying with all applicable export control and economic sanctions laws and regulations around the world, including China, the United States, and the European Union, is a basic compliance policy of InnoLight Technology (SUZHOU) LTD. and its subsidiaries and branches (hereinafter collectively referred to as "InnoLight" or "We"). InnoLight is committed to complying with all applicable export control and economic sanctions laws and regulations around the world, and implementing all applicable requirements related to the export, reexport and transfer (in-country) of commodity, software (including source code), and technology (collectively referred to as "items").

前述法规包括但不限于美国《出口管理条例》（“EAR”）、《出口管制改革法》（“ECRA”）、欧盟 2021/821 号条例（“欧盟《两用物项条例》”）、欧盟理事会第 833/2014 号条例（“欧盟《俄罗斯制裁条例》”）、欧盟理事会第 765/2006 号条例（“欧盟《白俄罗斯制裁条例》”）、英国《出口管制令》、英国保留适用的欧盟理事会 428/2009 号条例、中国《出口管制法》以及其他适用的，经不定期修订、补充或替换的，与出口管制和经济制裁相关的法律法规（统称“适用的贸易管制法”）。

The laws and regulations referred to above include but are not limited to the U.S. Export Administration Regulations (“EAR”), the U.S. Export Control Reform Act of 2018 (“ECRA”), the Regulation (EU) 2021/821 (“EU Dual-Use Regulation”), the Council Regulation (EU) No 833/2014 (“EU Russia Sanctions Regulation”), the Council Regulation (EC) No 765/2006 (“EU Belarus Sanctions Regulation”), the UK Export Control Order and retained Council Regulation (EC) No 428/2009, Export Control Law of the PRC and other applicable laws and regulations in relation to export control and economic sanctions, each as amended supplemented or substituted from time to time (collectively as “Applicable Trade Control Laws”).

我方期望并号召我们尊敬的业务合作伙伴全面理解并严格遵守适用贸易管制法。这包括但不限于：

We expect and appeal to our respected business partners to fully understand and strictly comply with the Applicable Trade Control Laws. This includes but is not limited to:

1. 不得以任何方式将我方产品直接或间接出口、再出口、转移、销售、租赁、运输或以其他方式转运至位于古巴、伊朗、朝鲜、叙利亚、克里米亚地区、顿涅茨克人民共和国地区、卢甘斯克人民共和国地区、俄罗斯联邦、白俄罗斯或委内瑞拉的任何主体，或用于上述地区内的任何拟定最终用途。

1. Shall not in any manner, directly or indirectly, export, re-export, transfer, sell, lease, deliver or otherwise divert InnoLight's Items to any party located in Cuba, Iran, North Korea, Syria, Crimea region, Donetsk People's Republic region, Luhansk People's Republic region, the Russian Federation, Belarus, or Venezuela, or for any intended end use in such territory.

2. 不得以任何形式将我方产品直接或间接出口、再出口、转移、销售、租赁、运输或以其他方式转运至：（1）美国商务部工业与安全局（“BIS”）实体清单（Entity List）或被拒绝人清单（Denied Persons List）项下所列的任何主体；（2）BIS 未经核实清单（Unverified List）项下所列的、且未出具符合 EAR 第 744.15 条所要求的声明的主体；（3）美国财政部外国资产控制办公室（“OFAC”）发布的特别指定国民和封锁人员清单（“SDN 清单”）、海外逃避制裁者清单（“FSE 清单”）、非 SDN 菜单式制裁清单（“NS-MBS 清单”）和行业制裁识别清单（“SSI 清单”）项下所列的任何主体；（4）欧盟委员会发布的“欧盟金融制裁综合清单”及欧盟《俄罗斯制裁条例》项下附件 XIX 清单，欧盟成员国发布的任何受制裁人员清单和英国财政部金融制裁实施办公室发布的“英国金融制裁目标综合清单”，前述清单可能经不定期修订、补充或替换，（5）列于其他适用贸易管制法下的相关贸易受限方清单（包括欧盟《俄罗斯制裁条例》项下附件 IV 和欧盟《白俄罗斯制裁条例》项下附件 V）（统称“贸易受限方清单”）的主体；（6）任何由贸易受限方清单中所列实体或个人直接或间接、单独或合计拥有（50%及以上）或控制，或为其利益行动的实体或个人；或（7）任何其他主体，包括但不限于在未获得主管监管机构的必要许可的情况下，成为适用贸易管制法目标的，系上述承诺第 1 条所列国家/地区的政府或由其拥有或控制的任何主体。

2. Shall not in any manner, directly or indirectly, export, re-export, transfer, sell, lease, deliver or otherwise divert InnoLight's Items to (1) any party listed in the Entity List or Denied Persons List of Bureau of Industry and Security (“BIS”); (2) any party listed in in the Unverified List of BIS without a statement from such entity meeting the requirement of part 744.15 of the EAR; (3) any party listed in the Office of Foreign Assets Control's (“OFAC”) List of Specially Designated Nationals and Blocked Persons (“SDN”), the Foreign Sanctions Evaders List (“FSE”), the Non-SDN Menu-Based (“NS-MBS”) Sanctions List, the Sectoral Sanctions Identifications (“SSI”); (4) the European Union Consolidated List of Financial Sanctions published by the European Commission, Annex XIX of EU Russia Sanctions Regulation, any list of sanctioned

persons issued by EU Member States, and the Consolidated List of Financial Sanctions Targets in the UK published by the Office of Financial Sanctions Implementation HM Treasury, each as amended, supplemented or substituted from time to time; (5) any party listed in other trade restricted party lists under the Applicable Trade Control Laws (collectively as “**Trade Restricted Party Lists**”), including Annex IV of the EU Russia Sanctions Regulation and Annex V of EU Belarus Sanctions Regulation; (6) 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 any of the Trade Restricted Party Lists, or (7) any other party, including but not limited to governments of countries/regions listed in Section 1 above or any entity owned or controlled by them, that is targeted by Applicable Trade Control Laws, without a required license from the competent regulatory authorities.

3. 我方的产品仅用于民事最终用途，不涉及军事目的或恐怖主义目的和/或适用贸易管制法所禁止的任何其他最终用途，包括但不限于用于大规模杀伤性武器，如核能、化学或生物武器、导弹，或任何支持此类武器或导弹技术的活动。

3. Innolight's Items are only used for civilian end-use, and not used for any military or terrorist purposes and/or any other end-use prohibited under Applicable Trade Control Laws, including but not limited to the use in weapons of mass destruction, such as nuclear, chemical, or biological weapons or missiles, or in any activities supporting such weapons or missile technology.

4. 遵照适用的贸易管制法，留存与我方产品有关目的地、最终用户、最终用途方面的全部纪录。

4. Maintain complete records of the destination, end-user, and end-use of Innolight's Items in compliance with applicable trade control laws.

5. 在您知道或应当知道发生了任何上述受限制的活动，请书面告知我方，我们会应尽最大努力采取补救措施。

5. If you know or should have known that any of the above restricted situations occur, YOU shall immediately notify us in writing, and WE shall use our best effort to undertake remedial measures.