致：苏州旭创科技有限公司所有员工

To: All Employees of InnoLight Technology (SUZHOU) Ltd.

自：丁海，苏州旭创科技有限公司总经理

From: Hai Ding, General Mananger of InnoLight Technology (SUZHOU) Ltd.

主题：管理层贸易合规承诺声明

Subject: Statement of Management Commitment to Trade Compliance

苏州旭创科技有限公司及其控股或控制的子公司和关联公司（统称“旭创”或“公司”）承诺遵守所有适用的出口管制和经济制裁法律法规。旭创以政策形式严格规定：公司及其所有员工必须遵守适用的贸易管制法。

InnoLight Technology (SUZHOU) Ltd. and its majority owned or controlled subsidiaries and affiliates (collectively “**InnoLight**” or the “**Company**”) are committed to compliance with all applicable export control and economic sanctions laws and regulations. It is InnoLight’s firm policy that the Company and all its employees must comply with the applicable trade control Laws.

前述法规包括但不限于中国《出口管制法》、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第 428/2009 号条例以及其他适用的，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 (collectively the **"Applicable Trade Control Law"**), each as amended supplemented or substituted from time to time.

为确保本政策的有效实施，公司特设贸易合规委员会作为旭创贸易合规管理的核心管理机构。旭创管理层全力支持本贸易合规计划的实施，并投入大量资源，确保其全球业务符合"适用的贸易管制法"。这一承诺要求每位员工的积极参与。

To ensure effective implementation of this policy, the Company has established the Trade Compliance Committee, which is the principle governing body for InnoLight's trade compliance management. InnoLight's management provides its full support to implementation of this trade compliance program and has dedicated substantial resources to maintain compliance with the Applicable Trade Control Law across its global operations. This commitment requires active participation of every employee.

公司已正式发布了《贸易合规政策》（以下简称**"本政策"**），所有员工均应仔细研读、准确理解并严格遵循。所有员工必须遵守所有"适用的贸易管制法"以及旭创发布的配套政策和流程，以确保符合本政策要求。本政策明令禁止任何代表旭创的个人或实体从事违反任何"适用的贸易管制法"的出口、再出口或国内转移活动。

The Company has also published a Trade Compliance Policy (the **"Policy"**), which all employees are expected to review, understand and follow. All employees must comply with all applicable Trade Control Law as well as the policies and procedures promulgated by InnoLight to ensure compliance with the Policy. The policy prohibits any individual or entity acting on behalf of InnoLight from engaging in exports, re-exports, or in-country transfers that violate any Applicable Trade Control Law.

因此，旭创的所有董事、高级职员和员工必须：

Accordingly, all directors, officers, and employees of InnoLight must:

- 充分了解"适用的贸易管制法"对自身岗位职责的具体适用要求；

- fully understand how Applicable Trade Control Law apply to their specific roles and responsibilities;
- 完成所有强制性合规培训计划；
- complete all required compliance training programs;
- 即时报告任何实际或潜在的合规风险事项；
- report any actual or potential compliance issues immediately;
- 保存完整且准确的业务相关文档、记录、数据和信息；
- maintain accurate and complete business documents, records, data and information;
- 如果对相关要求存疑，及时向贸易合规人员咨询确认。
- consult the relevant trade compliance personnel, if uncertain about the requirements.

特此严正声明，违反"适用的贸易管制法"将导致旭创及相关责任人员面临重大法律后果，包括但不限于：刑事和/或民事罚款、被列入"适用的贸易管制法"下的受限制主体清单、商誉和个人名誉损害。任何员工如果被发现违反"适用的贸易管制法"或本政策，除承担法律责任外，还将受到公司严厉纪律处分，最高可至解除劳动关系。

Please be advised that violations of the Applicable Trade Control Law may result in severe consequences for both InnoLight and the individuals involved, including but not limited to criminal and/or civil fines, restricted party designations under Applicable Trade Control Law, and reputational damages. Any employee 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, in addition to legal liabilities.

我恳请全体员工严格履行这些合规义务，并积极参与公司的合规体系建设。如果对贸易合规要求有任何疑问，或对合规体系优化有任何建议，请联系贸易合规人员或您所在实体/部门指定的贸易合规联系人。

I ask each of you to take these obligations seriously and to actively support the Company's compliance program. Should you have any questions concerning trade compliance or suggestions for improving our trade compliance program, please contact the trade

compliance personnel or your entity/department's designated trade compliance points of contact.

如果您怀疑或意识到任何旭创员工的行为可能违反"适用的贸易管制法"或本政策，您可以发送电子邮件至专项合规举报渠道 trade.compliance@Innolight.com（可选择匿名方式）。

If you suspect or become aware of any InnoLight employee's action that may be in violation of the Applicable Trade Control Law or the Policy, you may email the dedicated compliance reporting channel at trade.compliance@Innolight.com that may allow you to remain anonymous.

Signature: 

Hai Ding, General Mananger of InnoLight Technology (SUZHOU) Ltd.

Date: 30th April 2025