贸易合规政策

Trade Compliance Policy

1. 介绍 Introduction

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（统称"**适用的贸易管制法**"）。因此，旭创颁布本贸易管制合规政策（简称"**本政策**"），列明所有旭创员工必须研读、理解和遵守的合规要求。本政策适用于旭创及所有旭创员工。每位旭创员工均有责任全力支持公司的合规工作。

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 (collectively the "**Applicable Trade Control Law**"). Accordingly, InnoLight promulgates this Trade Control Compliance Policy (the "**Policy**"), setting forth the compliance requirements that all InnoLight employees ("**InnoLight Personnel**") must review, understand and follow. This Policy applies to InnoLight and all InnoLight Personnel. It is the responsibility of each InnoLight Personnel to fully support the Company's compliance efforts.

2. 政策概览 Policy Overview

"适用的贸易管制法"包括中国、联合国、欧盟、美国等司法管辖区以及其他旭创业务所在地的主管机关实施的出口管制和经济制裁法律法规。"适用的贸易管制法"是出于国家安全和外交政策原因，对某些实物、软件、技术和服务（统称"**物项**"）的出口、再出口或国内转移实施出口限制。管制物项包括军用物项、兼具民事和军事用途的"两用"物项以及其他受限制最终用途的物项，例如核武器、化学武器或生物武器或导弹技术。中国、美国、欧盟和某些其他司法管辖区还对指定国家和地区实施属地制裁，并对根据"适用的贸易管制法"被列入各种受限制主体清单的政府、公司和个人（"**受限制主体**"）实施定向限制。

The Applicable Trade Control Law includes export control and economic sanctions laws and regulations administered by the authorities of the People's Republic of China, United Nations, European Union, the United States, and other jurisdictions where InnoLight operates in. The Applicable Trade Control Law imposes export restrictions on the export, reexport or in-country transfer of certain commodities, software, technology

苏州工业园区霞盛路8号
8 Xiasheng Road, Suzhou Industrial Park, Suzhou, Jiangsu, 215126, China
0512-8666 9288
www.innolight.com

and the provision of services (collectively, "**Items**") for national security and foreign policy reasons. Controlled Items include Items for military use, "dual-use" Items with both civil 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 Applicable Trade Control Law ("**Restricted Party**").

本政策旨在帮助每位旭创员工了解"适用的贸易管制法"的基本要求，并为遵守这些法律法规提供指导。

This Policy serves to help each InnoLight Personnel understand the baseline requirements stipulated under the Applicable Trade Control Law and offers guidance to ensure adherence to such laws and regulations.

3. 政策的基本原则 Key Policy Principles

本政策要求旭创员工遵守以下义务和原则。

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

- 不得代表旭创从事任何违反"适用的贸易管制法"的交易活动。
  No transactions are to be conducted by or on behalf of InnoLight contrary to the Applicable Trade Control Law.

- 不得与任何位于、总部设于或注册于受到全面制裁或其他制裁的受限制国家/地区（"**受限制国家/地区**"）的实体进行直接或间接业务往来。目前，受限制国家/地区包括伊朗、叙利亚、朝鲜、古巴、俄罗斯、白俄罗斯、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。
  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.

- 任何与位于、总部设于或注册于某些高风险国家（"**高风险国家**"）的任何实体直接或间接进行的业务往来，均须事先经贸易合规人员审查。目前，亚美

苏州工业园区霞盛路8号
8 Xiasheng Road, Suzhou Industrial Park, Suzhou, Jiangsu 215126, China
0512-8666 9288
www.innolight.com

尼亚、阿塞拜疆、柬埔寨、格鲁吉亚、哈萨克斯坦、吉尔吉斯斯坦、老挝、蒙古、塔吉克斯坦、土库曼斯坦、乌克兰、乌兹别克斯坦、越南、缅甸、委内瑞拉、也门、尼加拉瓜均被列为高风险国家。

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 Personnel in advance. Currently, Armenia, Azerbaijan, Cambodia, Georgia, Kazakhstan, Kyrgyzstan, Laos, Mongolia, Tajikistan, Turkmenistan, Ukraine, Uzbekistan, Vietnam, Myanmar, Venezuela, Yemen and Nicaragua are High Risk Countries.

- 若与下列名单中的任何受限制主体的交易被"适用的贸易管制法"明确禁止，或缺乏所需的授权与许可，则不得与相关主体进行直接或间接的业务往来。

  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. 中国商务部发布的出口管制管控名单、出口管制关注名单、不可靠实体清单、反制清单以及中国外交部发布的反制裁清单中的任何主体；

  Any Party listed in the Export Control Restricted Namelist, Export Control Watch List, Unreliable Entity List and Anti-Sanctions List administered by the Ministry of Commerce of the PRC, and the Anti-Sanctions List administered by the Ministry of Foreign Affairs of the PRC;

  ii. 美国商务部工业与安全局（**"BIS"**）发布的 被拒绝实体清单（**Denied Persons List**）、实体清单（**Entity List**）、未经核实清单（**Unverified List**）以及军事最终用户清单（**Military End User List**）项下所列的任何主体；

  Any party listed in the Denied Person List (**"DPL"**), Entity List (**"EL"**), Unverified List (**"UVL"**) and Military End User List (**"MEU"**) of the Bureau of Industry and Security (**"BIS"**) of U.S. Commerce Department;

  iii. 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，以及由 SDN 和 SSI 中列出的任何一方直接或间接、单独或合计拥有（50% 或以上）的任何主体；

  Any party listed in the Specially Designated Nationals and Blocked Persons List (**"SDN"**), Foreign Sanctions Evaders List (**"FSE"**), the Non-SDN

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0512-8666 9288
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Menu-Based Sanctions List ("**NS-MBS**"), the Sectoral Sanctions Identifications ("**SSI**") of OFAC, 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;

iv. 欧盟委员会发布的"欧盟金融制裁综合清单"、第 833/2014 号条例项下附件 IV 清单及附件 XIX 清单，第 765/2006 号条例项下附件 V 清单中的任何主体 ·欧盟成员国发布的任何受制裁人员清单上的任何主体，以及由上述清单中列出的任何一方直接或间接、单独或合计拥有（50%或以上）的任何主体；
Any party listed in the 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, and any party owned (50% or more) or controlled by, directly or indirectly, individually or in the aggregate, or acting for the interest of any of entities or individuals listed thereof;

v. 英国外交、联邦及发展办公室（"**FCDO**"）公布的英国制裁清单上的任何主体，以及由该清单中列出的任何一方直接或间接、单独或合计拥有（50% 或以上）的任何主体；
Any Party listed in the UK Sanctions List published by the Foreign, Common Wealth & Development Office ("**FCDO**") and any party owned (50% or more) or controlled by, directly or indirectly, individually or in the aggregate, or acting for the interest of any of entities or individuals listed thereof;

vi. 根据"适用的贸易管制法"不时适用、修订、补充或替换的其他受限制主体清单中的任何主体。
Any party listed in the other Restricted Party List as applicable, amended, supplemented or substituted from time to time pursuant to the Applicable Trade Control Law.

- 不得在明知的情况下将旭创的物项出口、再出口或国内转移给"适用的贸易管制法"所禁止的任何最终用途，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，火箭系统和无人机（UAVs），军事最终用途和军事情报最终用途。

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Not knowingly export, reexport or in-country transfer InnoLight's Items for any prohibited end use under the Applicable Trade Control Law, 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, rocket systems and unmanned aerial vehicles (UAVs), military end-use and military intelligence end-use.

- 完成员工合规承诺书，确认遵守"适用的贸易管制法"、本政策以及公司颁布的程序，以确保合规。
  Complete an employee compliance certification regarding compliance with the Applicable Trade Control Law, this Policy as well as procedures promulgated by the Company to ensure compliance.

- 了解"适用的贸易管制法"对自身工作的适用要求，参与并完成所有必修合规培训课程。涉及出口业务的旭创员工必须掌握"适用的贸易管制法"的实务知识，尤其是那些与其岗位职能直接相关的条款，以及旭创贸易管制合规政策和操作流程的具体要求。
  Understand how the Appliable Trade Control Law applies to the work you do, participate in and complete all required compliance trainings. InnoLight Personnel with export responsibilities are required to have a working knowledge of the Applicable Trade Control Law, especially those governing their specific job functions, as well as working knowledge of InnoLight's trade compliance policies and procedures.

- 在将任何旭创产品或第三方产品出口、再出口或国内转移之前，必须根据相关公司程序进行适当的尽职调查和主体筛查，并完整记录相关过程，以确认是否需要任何政府机构的事先授权或许可。如经调查确认需事先获得出口授权，在未获得相应授权前，旭创不得进行此类交易。
  Before any export, reexport, in-country transfer of 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 confirm whether prior authorization or license is required from any government authority. To the extent a prior export authorization is required, InnoLight shall not proceed with such transaction without first obtaining the appropriate authorization.

- 在对旭创产品提供任何服务、维修、退货或维护支持之前，必须根据适用的公司程序开展事前尽职调查和主体筛查，并完整记录相关过程，以确保此类售后活动符合"适用的贸易管制法"的合法性要求。

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Before any provision of service, repair, return or maintenance support of 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 the Applicable Trade Control Law.

- 在开展研发项目（包括公司内部活动）前，相关人员必须确保在设备、硬件、软件、技术的采购和使用等方面严格遵守"适用的贸易管制法"。
  Before engaging in research and development projects, including intra-company activities, personnel must comply with the Applicable Trade Control Law, such as in the procurement and use of equipment, hardware, software, and technology.

- 从供应商处采购物项时，务必获取此类物项的出口管辖权和出口分类信息。例如，如果采购的物项受美国《出口管理条例》（**"EAR"**）管辖，则旭创必须获取与任何此类实物、技术或软件相关的出口管制分类编号（**"ECCN"**）。
  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"**), InnoLight must obtain the Export Control Classification Number (**'ECCN"**) related to any such commodity, technology, or software.

- 在日常工作中采取措施，准确、完整地记录与出口活动相关的信息，并根据公司规程将此类记录保存在适当的位置。
  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.

- 警惕任何可能表明旭创物项可能流向不适当目的地、最终用途或最终用户的情况或迹象（统称**"危险信号"**）。应对相关危险信号进行尽职调查并/或采取进一步行动之前将此类情况报告给贸易合规人员或者您所在实体/部门指定的贸易合规联系人知悉。
  Be alert to circumstances or signs indicating 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 Trade Compliance Personnel or your entity/department's designated trade compliance points of contact for awareness before taking further action.

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违反“适用的贸易管制法”可能导致旭创及其相关责任人面临严重后果，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以及商誉和个人名誉损害。任何被发现违反“适用贸易管制法”或本政策的人员还将受到公司的重大纪律处分，最高可至解除劳动关系。

Violations of the Applicable Trade Control Law may result in severe consequences for both InnoLight and responsible individuals, including but not limited to criminal and/or civil fines, restricted party designations under the Applicable Trade Control Law as well as reputational damage. Anyone found to be in violation of the Applicable Trade Control Law or the Policy will be subject to significant disciplinary actions by the Company, up to and including termination.

如对本政策有任何疑问，请通过 trade.compliance@innolight.com 联系我们。

If you have any questions concerning this Policy, please contact us via trade.compliance@innolight.com.

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