

贸易管制合规管理层承诺声明

Management Commitment on Trade Control Compliance

致：全体董事、管理人员、员工

To: All Directors, Officers and Employees

舜宇光学科技（集团）有限公司及其控股子公司（统称“舜宇”）致力于遵守所有适用的国际、国家和地区的出口管制及经济制裁法律法规（简称“贸易管制合规”）。为确保舜宇建立、维护与持续深化贸易管制合规体系，并促使所有员工妥善处理与贸易管制合规相关的事务，舜宇管理层郑重承诺：

Sunny Optical Technology (Group) Co., Ltd. and its holding subsidiaries (collectively referred to as “SUNNY”) are committed to complying with all applicable international, national, and regional export control and economic sanctions laws and regulations (hereinafter referred to as “Trade Control Compliance”). In order to ensure that SUNNY establishes, maintains, and continuously deepens its Trade Control Compliance system, and urges all employees to properly handle matters related to Trade Control Compliance, SUNNY's management solemnly promises:

1. 舜宇董事长、首席执行官、执行总裁及管理层将完全遵守其业务所适用的出口管制及经济制裁法律法规的各项规定，严格执行管制要求，确认舜宇应当拥有一套行之有效的贸易管制合规体系，并为此提供充分的资源与专业支持。

1. The Chairman, CEO, Executive President and management of SUNNY shall fully abide by the provisions of export control and economic sanctions laws and regulations applicable to its business, strictly implement the business-related and applicable control requirements, and confirm that SUNNY shall have an effective Trade Control Compliance system, provide sufficient resources and professional support.

2. 舜宇首席执行官主持贸易管制合规工作。贸易管制合规工作小组负责日常工作的具体开展，并实际履行舜宇对此的承诺。审计监察部负责监督贸易管制合规工作的实施。

2. The CEO of SUNNY presides over the work of Trade Control Compliance. The Trade Control Compliance Working Group is responsible for the specific implementation of daily work and the actual implementation of SUNNY's commitment. The Audit Department is responsible for supervising the implementation of Trade Control Compliance.

3. 贸易管制合规工作小组以及控股子公司的总经理负责向所有员工、供应商、分销商及其他业务伙伴清楚传达管理层承诺，并负责确保舜宇贸易管制合规制度得到遵守。

3. The Trade Control Compliance Working Group and the General Managers of the holding subsidiaries are responsible for clearly delivering the management commitment to all employees, suppliers, distributors and other business partners, and ensuring compliance with the Trade Control Compliance system of SUNNY.

4. 舜宇的所有董事、管理人员必须充分理解出口管制及经济制裁法律法规如何适用于其工作，并

向贸易管制合规工作小组或审计监察部报告任何潜在的合规问题、违规行为或规避行为，同时确保记录、数据和信息的准确性、完整性和可追溯性，并予保存。如果在工作中对某些交易的合规性存在疑问，或发现任何潜在的违规行为或规避行为，请联系：电话 0086-574-62538080，邮箱 office@sunnyoptical.com。

4. All directors and managers of SUNNY must fully understand how export control and economic sanctions laws and regulations apply to their work, and report any potential compliance issues, violations or circumventions to the Trade Control Compliance Working Group or the Audit Department, and ensure the accuracy, integrity and traceability of records, data and information, and maintain such records properly. For any questions about transaction compliance, potential violations or circumventions during work, please contact Tel 0086-574-62538080; Email office@sunnyoptical.com.

5. 舜宇组织并实施全面的贸易管制合规培训，定期对业务流程进行管制风险评估，对重点国家和重点业务环节进行核查，并将不时补充与贸易管制合规相关的其他内部规定和政策，以适应法律法规的动态变化。

5. SUNNY organizes and implements comprehensive compliance training on Trade Control Compliance, regularly evaluates the control risk of business processes, checks key countries and key business aspects, and shall supplement other internal regulations and policies related to Trade Control Compliance from time to time to adapt to dynamic changes in laws and regulations.

6. 违反出口管制及经济制裁法律法规将为舜宇及相关责任人招致严重后果，包括刑事和/或民事罚款、被列为受限方、资产冻结甚至被处以监禁，使舜宇与个人的声誉和业务遭受重大损害。任何董事、管理人员、员工，如若被发现违反法律法规或政策，除需要受到舜宇的纪律处分外，还将承担法律责任。

6. Violation of export control and economic sanctions laws and regulations shall lead to serious consequences for SUNNY and relevant responsible persons, including criminal and / or civil fines, being listed as a sanctioned party, asset freezes, and/or even being sentenced to imprisonment, causing significant damage to the reputation of SUNNY and individuals. If any director, manager or employee is found to be in violation of laws, regulations or policies, he or she shall bear legal liability in addition to disciplinary action by SUNNY.

7. 舜宇承诺持续关注全球出口管制及经济制裁法律法规变化，确保所有业务决策符合要求。

7. SUNNY commits to continuously pay attention to global changes in export control and economic sanctions laws and regulations, ensuring that compliance of all business decisions with regulatory requirements.

承诺人：

Committed by:

日期：

Date:


2028.02.12