

舜宇光学科技（集团）有限公司

贸易管制合规制度

Sunny Optical Technology (Group) Co., Ltd.

Trade Control Compliance Policy

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1 总则

1 General Provisions

1.1 舜宇光学科技（集团）有限公司（以下称“舜宇光学科技”）为有效地确保公司及其控股子公司（以下称“控股子公司”，与舜宇光学科技合称“公司”）遵守主要国家和地区的出口管制和经济制裁法律法规的要求，并且促使公司员工妥善地处理与出口管制和经济制裁相关的事务，特制定贸易管制合规制度（以下称“本制度”）。

1.1 This trade control compliance policy (this “Policy”) is hereby established by **Sunny Optical Technology (Group) Co., Ltd. (“Sunny Optical”)** in order to effectively ensure the Sunny Optical and its Controlled Subsidiaries (the “Controlled Subsidiaries”, collectively with Sunny Optical, the “Companies”), comply with the laws and regulations of major countries and regions on export control and economic sanctions, and urge the Companies’ employees to properly handle matters related to export control and economic sanctions.

1.2 本制度旨在建立规范、有效的贸易管制合规体系，维护公司的品牌信誉，促进公司持续、健康、稳定发展。

1.2 This Policy aims at establishing a standardized and effective trade control compliance system, safeguarding the Companies’ brand and reputation, and promoting the Companies’ sustained, healthy and stable development.

1.3 本制度适用于舜宇光学科技及其控股子公司，舜宇光学科技及其控股子公司的各级管理人员和员工均应遵守本制度。

1.3 This Policy shall apply to Sunny Optical and its Controlled Subsidiaries. All the managing personnel at all levels and employees of Sunny Optical and its Controlled Subsidiaries shall abide by this Policy.

2 内容与组织体系

2 Contents and Organizational System

2.1 公司按照适用的出口管制法律法规以及经济制裁法律法规（以下称“出口管制法律”）开展业务，包括进行产品、物料、服务和软件的进口、出口、采购、销售、装运与技术转让。

2.1 Companies shall carry out its business operations, including the import, export, purchase, sales, shipment and technology transfer of products, materials, services and software in accordance with all applicable laws and regulations on export control and economic sanctions (the “Export Control Laws”).

2.2 出口管制法律可能涉及舜宇光学科技的多个部门以及控股子公司，因此各公司应将出口管制有关程序纳入相关业务流程，以确保公司的合规控制有效进行。

2.2 The Export Control Laws may involve Sunny Optical’s multiple departments and Controlled Subsidiaries. Therefore, the Companies shall incorporate export control procedures into their business processes to ensure that the Companies’ compliance control is carried out effectively.

2.3 公司各级管理人员和员工均应知晓，违反出口管制法律都可能导致公司或相关负责人员承担严重法律责任，如罚款、监禁、出口/再出口限制、供应商和银行与公司合作受限、被列入制裁名单等；此外，任何违反出口管制法律的行为都可能严重损害公司的品牌和声誉。

2.3 The managing personnel at all levels and employees of each Company must be aware that violations of the Export Control Laws may cause the Company or relevant responsible persons to bear severe legal liabilities, such as fines, imprisonment, export/re-export restrictions, disruption in the Company's relationship with suppliers and banks, inclusion on sanctions lists, etc. Besides, any violation of the Export Control Laws may severely damage the Company's brand and reputation.

2.4 舜宇光学科技总裁主持集团风险管理的全面工作，舜宇光学科技风险管理领导小组（以下称“**集团领导小组**”）负责本制度的总体工作，舜宇光学科技贸易合规工作小组（以下称“**集团工作小组**”）负责本制度日常工作的具体开展，并对集团领导小组以及总裁负责。舜宇光学科技审计部负责监督本制度的实施。各控股子公司总经理主持所在控股子公司的贸易管制合规工作，并应建立相应控股子公司风险管理领导小组（与集团风险管理领导小组合称为“**领导小组**”）、贸易合规工作小组（与集团贸易合规工作小组合称为“**工作小组**”）。各公司各级管理人员和员工也同样有责任遵守出口管制法律。

2.4 The CEO of Sunny Optical will preside over the overall risk management of the company group. The risk management Leading Group of Sunny Optical (the “**Sunny Leading Group**”) shall be responsible for the overall work of this Policy, and the trade control compliance Working Group of Sunny Optical (the “**Sunny Working Group**”) shall be responsible for the daily implementation of this Policy and shall report to the Sunny Leading Group and the CEO. The audit department of Sunny Optical shall be responsible for supervising the implementation of this Policy. The general managers of each Controlled Subsidiaries shall lead the trade control compliance work of the Controlled Subsidiaries to which they belong, and shall establish their respective risk management leading groups (collectively with the Sunny Leading Group, the “**Leading Group**”), trade control compliance working groups (collectively with the Sunny Working Group, the “**Working Group**”). Managing personnel at all levels and employees of each Company shall also be responsible for complying with the Export Control Laws.

2.5 贸易管制合规的主要工作包括物品识别、交易相对方识别、交易识别、许可证申请和后续核查等。

2.5 The main sub-areas of trade control compliance include item classification, counterparty screening, transaction screening, license determination and follow-up verification, etc.

3 管理层承诺

3 Management Commitment

3.1 公司的总裁和管理层承诺公司将遵守出口管制法律，确认公司应当拥有一套行之有效的贸易管制合规体系，以及配备必要的人员、资源与业务能力。

3.1 The CEO and the management personnel of the Companies commit that the Companies will abide by the Export Control Laws and ensure that the Companies shall have an effective trade control compliance system and be equipped with necessary personnel, resources and business capabilities.

3.2 各公司将建立领导小组及工作小组，由其专门负责本制度日常工作的具体开展以及指导落实，并具体负责履行公司对本制度的承诺。舜宇光学科技将要求领导小组负责本制度在其所在公司的总体工作，并要求审计部负责监督本制度的实施。公司将确保有足够的资源（包括时间、资金、人员）可用于本制度的实施与维护。

3.2 Companies will establish a Leading Group and a Working Group, to be responsible for the daily administration of this Policy and providing guidance on the implementation of this Policy, and in particular responsible for fulfilling the Company's commitments to this Policy. Companies will require the Leading Group to be responsible for the overall work of this Policy in the respective Company, and require the audit department to be responsible for supervising the implementation of this Policy. The Companies will ensure that sufficient

resources (including time, funds and personnel) are available for the implementation and maintenance of this Policy.

3.3 工作小组以及控股子公司的总经理负责向所有员工清楚地传达管理层承诺，并负责确保公司贸易管制政策得到遵守。

3.3 The Working Group and the general managers of the Controlled Subsidiaries shall be responsible for explicitly communicating the management commitments to all employees and for ensuring compliance with the Companies' trade control policies.

4 合规治理框架

4 Compliance Governance Framework

4.1 一般框架

4.1 General framework

4.1.1 工作小组负责关注和学习出口管制法律的更新，并告知有关部门以及有关控股子公司；负责总体指导控股子公司实施本制度；负责发展公司贸易管制合规能力、推动出口管制知识共享、提供必要工具以及协助解决贸易管制合规方面的问题，以此指导和帮助控股子公司开展业务；负责将贸易管制合规的重大事务报领导小组进行审批。

4.1.1 The Working Group shall be responsible for monitoring and studying the updates to Export Control Laws and notifying relevant departments and relevant Controlled Subsidiaries, providing overall guidance on the Controlled Subsidiaries' implementation of this Policy, developing the Companies' trade control compliance competence, driving the sharing of export control knowledge, providing key tools and assisting in solving the issues concerning trade control compliance, so as to guide and support Controlled Subsidiaries to carry out the business, and reporting material matters on trade control compliance to the Leading Group for approval.

4.1.2 控股子公司的总经理负责按照本制度的规定以及集团工作小组的指导意见进行本制度的具体实施；负责确保其所在控股子公司内有合格和充足的资源以及人员，以遵守出口管制法律，并解决已发现的贸易管制事宜。

4.1.2 The general managers of each Controlled Subsidiary shall be responsible for the specific implementation of this Policy in accordance with the provisions hereof and the guidance of the Sunny Working Group, and ensuring that there are qualified and sufficient resources and personnel in the Controlled Subsidiaries to which they belong, to comply with the Export Control Laws and resolving the trade control issues that have been identified.

4.1.3 如任何员工或人员对出口管制法律存在疑问，或对某一交易是否合规存在疑问，或获知存在任何对本制度的违反情形，应寻求其任职公司的负责人员的指导和意见，控股子公司可以寻求集团工作小组的指导和建议。

4.1.3 If any employee or person has doubts relating to the Export Control Laws or questions as to the compliance of any transaction, or is aware of any violation of this Policy, he or she should seek guidance and opinions from the responsible person of the Company where he or she works. Controlled Subsidiaries can seek guidance and suggestions from the Sunny Working Group.

4.1.4 公司应确保处理贸易管制合规事宜的人员具有足够的独立性。如上述人员认为有必要，应有权将相关交易上报。

4.1.4 The Companies shall ensure that the personnel handling with trade control compliance matters are sufficiently independent, and that they shall have the right to escalate the relevant transactions if they deem it necessary.

4.2 职务与职责

4.2 Duties and responsibilities

4.2.1 公司将确定与贸易管制合规相关的职能、职责和责任，并分配给相关职务的人员。所有从事贸易管制合规相关工作的员工必须具备足够的出口管制法律知识。

4.2.1 The Companies will determine the functions, duties and liabilities related to trade control compliance and assign them to the persons in relevant positions. All employees engaged in related trade control compliance work must master sufficient knowledge of the Export Control Laws.

5 合规工作

5 Compliance Activities

5.1 风险管控

5.1 Risk management

5.1.1 本制度是公司《风险管理制度》的一部分，因此公司应当按照《风险管理制度》定期进行贸易管制风险评估。

5.1.1 This Policy is an integral part of the Companies' *Risk Management Policy*, so the Companies shall regularly assess the trade control risk in accordance with the *Risk Management Policy*.

5.1.2 公司的贸易管制合规流程旨在确保公司各部门遵守本制度，尤其是以下方面：

- (1) 公司合规结构与合规意识；
- (2) 公司出售和采购的产品、服务、技术和软件的出口管制分类；
- (3) 对交易相对方的识别；
- (4) 与被禁运和制裁的国家、实体、个人进行的交易；以及
- (5) 文件记录。

5.1.2 The Companies' trade control compliance process aims at ensuring that the Companies' various departments comply with this Policy, especially in the following aspects:

- (1) The Companies' compliance structure and compliance awareness;
- (2) Export control classification of products, services, technologies and software sold and purchased by the Companies;
- (3) Counterparty screening;
- (4) Transactions with embargoed and sanctioned countries, entities, and individuals; and
- (5) Documents and records.

5.2 主要任务

5.2 Main sub-areas

5.2.1 贸易管制合规主要工作包括物品识别、交易相对方识别、交易识别、许可证申请和后续核查。

5.2.1 The main sub-areas of trade control compliance include item classification, counterparty screening, transaction screening, license determination and follow-up verification.

5.2.2 物品识别

5.2.2 Item classification

5.2.2.1 公司应了解向客户提供的产品、软件和服务的性质，还应了解公司向供应商采购和进口的产品、软件和服务及内部使用的物品的性质。这要求公司了解向客户提供的产品、软件、服务和技术的出口管制分类，了解公司向供应商采购的产品、软件和服务及内部使用的物品的出口管制分类，了解上述物料是否受管制，以及对如何确定这些物品的美国出口管制分类号及其他国家出口管制编号有基本的知识。

5.2.2.1 The Companies shall understand the nature of the products, software, and services they provide to customers, as well as the nature of the products, software, and services purchased and imported by the Companies from suppliers and the items used internally. This requires the Companies to understand the export control classification of products, software, services and technologies provided to customers, understand the export control classification of products, software and services purchased by the Companies from suppliers, and items used internally, understand whether the above materials are controlled, and have a basic knowledge of how to determine the US Export Control Classification Numbers and the export control numbers of other countries with respect to these items.

5.2.2.2 军民两用物品和其他受控物品的所有进口、出口、销售和运输（包括某些形式的转移，例如允许第三方使用软件和下载技术）应遵守与军民两用产品和其他受控物品有关的法律法规。

5.2.2.2 All imports, exports, sales and transportation (including controlled transfers, such as grant to third parties access to software and technology downloads) of dual-use items and other classified items shall comply with the laws and regulations related to dual-use products and other classified items.

5.2.2.3 公司应进行贸易管制信息管理。相关部门和控股子公司的员工和其他相关人员应接受出口管制分类培训，并能够进行分析。

5.2.2.3 The Companies shall manage the trade control information. Employees of relevant departments and Controlled Subsidiaries and other relevant persons shall receive training for export control classification and be able to conduct analysis.

5.2.2.4 作为物品识别制度的一部分，公司应对向客户提供的产品、物料的最终用途进行监督。公司应注意交易中是否存在风险信号，并确保已经了解了客户的最终用途。

5.2.2.4 As a part of the item classification rules, the Companies shall supervise the end use of the products and materials provided to customers. The Companies shall pay attention to whether there are risk indicators in the transaction and ensure that it has understood the relevant customer's end use.

5.2.3 交易相对方识别

5.2.3 Counterparty Screening

5.2.3.1 交易相对方识别是用以防止公司与受制裁措施约束的实体和个人进行交易的合规控制程序。许多国家政府以及国际组织（如联合国）会设立其制裁的实体和个人的名单。

5.2.3.1 The counterparty screening is a compliance control procedure used to prevent the Companies from conducting transactions with entities and individuals subject to restrictive measures. Government authorities of various countries and international organizations (such as the United Nations) maintain lists of entities and individuals that they impose sanctions on.

5.2.3.2 交易相对方识别是指检查一个实体、直接或间接控制该实体的任何主体，或与公司有利害关系的任何个人（例如供应商、客户、货运代理商或其他交易相对方）是否出现在制裁或控制名单中。如果出现在这些名单中，则还应检查与该实体或个人的交易是否违法，以及是否可能给公司带来其他严重后果。

5.2.3.2 The counterparty screening refers to checking whether an entity, any party that directly or indirectly controls the entity, or any individual of interest to the Companies (such as a supplier, customer, freight forwarder or other counterparty) appears on the sanction or control lists; if the said is listed on these lists, it is also required to check whether the transaction with the entity or individual is unlawful or could lead to other serious consequences for the Companies.

5.2.3.3 公司应设立与交易相对方识别相关的程序，以确保交易合规。

5.2.3.3 The Companies shall establish the procedures related to counterparty screening to ensure the compliance of transactions.

5.2.4 交易识别

5.2.4 Transaction screening

5.2.4.1 联合国、美国、欧盟以及其他国家为了限制大规模杀伤性武器扩散、生化武器扩散、国内镇压、恐怖主义等特定目的，对某些国家、实体或个人实施限制性制裁。制裁形式多种多样，包括外交制裁、军事制裁、旅行禁令、贸易限制和经济制裁。

5.2.4.1 The United Nations, the United States, the European Union and other countries impose restrictive sanctions on certain countries, entities or individuals for specific purposes, such as limiting the proliferation of weapons of mass destruction, proliferation of biological and chemical weapons, domestic repression, and terrorism. There are many forms of sanctions, including diplomatic sanctions, military sanctions, travel bans, trade restrictions and economic sanctions.

5.2.4.2 上述制裁可能是全面制裁，完全禁止与某个国家进行交易，也可能是有针对性的制裁，仅禁止与受制裁国家内特定行业、企业、金融机构或个人进行交易。还需注意，美国制裁的管辖权非常广泛，可能存在域外适用情形，即制裁可能适用于位于美国境外，并且与美国无关的个人和企业。

5.2.4.2 The above sanctions may be comprehensive sanctions, prohibiting the transactions with an entire country, or may be targeted sanctions, blocking transactions of and with particular sectors, enterprises, financial institutions or individuals in the sanctioned countries. Moreover, it shall be noted that the United States has a very broad jurisdiction for its sanctions including extraterritorial reach, i.e., sanctions may apply to individuals and enterprises outside of and without connection to the United States.

5.2.4.3 公司应审查所有交易是否涉及受制裁国家、实体、个人，包括审查交易物品的出口管制分类、审查交易相对方以及交易中其他主体是否涉及受制裁国家、实体、个人，以及公司是否遵守对这些国家、实体、个人采取的经济制裁与出口管制措施，以确保交易不会违反上述制裁。

5.2.4.3 Companies shall review all transactions to check if any of them involves sanctioned countries, entities and individuals, including reviewing the export control classification of the traded items, reviewing whether the counterparty and other parties in the transaction involve sanctioned countries, entities and individuals, and whether the Companies comply with the economic sanctions and export control measures taken against these countries, entities and individuals to ensure that transactions do not contravene the aforementioned sanctions.

5.2.4.4 公司应核实所有交易（包括进口、出口、转口、国内转让、融资和技术转让等情形）的情况，并确保遵守相关制裁法律法规，包括但不限于中国法律法规、联合国法规、美国财政部下属的外国资产控制办公室的法规、美国商务部下属的工业与安全局的法规以及欧盟制裁法规等。

5.2.4.4 Companies shall verify all transactions (including import, export, re-export, domestic transfer, financing, technology transfer, etc.), and ensure compliance with relevant sanctions laws and regulations, including but not limited to the Chinese laws and regulations, regulations of the United Nations, regulations of the Office of Foreign Assets Control of the US Department of the Treasury, and regulations of the Bureau of Industry and Security of the Department of Commerce, and sanctions regulations of the European Union.

5.2.5 许可证

5.2.5 License

5.2.5.1 特殊情况下，公司产品的出口、出售、转让、允许特定受限制方接触受管制物品以及进行涉及受制裁国家或实体的经济活动前，可能需要向出口管制部门申请许可证。

5.2.5.1 Under special circumstances, the Companies may need to apply for licenses from export control authorities before exporting, selling, or transferring of products, or allowing specific restricted parties to access controlled items and conducting economic activities involving sanctioned countries or entities.

5.2.5.2 取决于具体的出口管制法律的规定，涉及受管制物品、交易相对方或国家的特定交易可能需要申请许可证。未获得有关部门颁发的许可证或授权之前，不得进行特定交易。

5.2.5.2 Subject to the regulation of specific Export Control Laws, a license may be required for certain transactions involving controlled items, counterparties or countries, and such transactions shall not be conducted without obtaining licenses or authorizations issued by the relevant authorities.

5.2.6 后续核查

5.2.6 Follow-up verification

5.2.6.1 在实际装运或转移物品之后，交易进行中及完成后，还应审慎对与贸易管制有关的主要风险领域进行跟踪与后续核查，包括物品的最终用户和最终用途、交易相对方是否被出口管制法所制裁或限制、是否出现潜在风险的信号等。

5.2.6.1 After the items are shipped or transferred, in the course of conducting the transaction and after the transaction is completed, the main risk fields related to trade control should also be carefully tracked and followed up, including the end user and end use of the items, whether the counterparty is sanctioned or restricted by the Export Control Laws, whether there are potential risk indicators, etc.

6 记录保存

6 Recordkeeping

6.1 记录保存要求

6.1 Requirements for recordkeeping

6.1.1 公司应保存至少五（5）年的与贸易管制相关交易信息和记录。如果适用法律规定应保存更长时间，则记录应保存更长时间。

6.1.1 The Companies shall maintain trade control information and records for a minimum period of five (5) years or such longer period required by applicable law.

6.1.2 相关交易信息和记录可以包括商业发票、出口报关文件、进口报关文件、提单、许可证和其他文件，和包含的以下信息：

- (1) 物品描述；
- (2) 物品的原产国；
- (3) 物品的数量和价值；
- (4) 出口商和收货人的名称和地址；
- (5) 与尽职调查活动相关的记录；
- (6) 物品的最终用途和最终用户；以及

(7) 其他公司认为需要保存的文件。

6.1.2 Trade control information and records can include commercial invoices, export declaration documents, import declaration documents, bills of lading, licenses and other documents, as well as the following information:

(1) Description of the items;

(2) Country of origin of the items;

(3) Quantity and value of the items;

(4) Name and address of the exporter and consignee;

(5) Records related to due diligence activities;

(6) End use and end user of the items; and

(7) Other files that the Companies deems necessary to be preserved.

6.1.3 文件记录由舜宇光学科技各部门以及各控股子公司各自负责。正在进行的交易的上述文件应由相关部门存放于适当地点，其他文件应能在合理时间内取得。所有文件应妥善整理，随时可供检查。

6.1.3 Documents and records shall be in the respective charge of Sunny Optical's various departments and Controlled Subsidiaries. The foresaid documents for ongoing transactions shall be kept in an appropriate place by the relevant department, and other documents should be retrievable within a reasonable time. All documents shall be in good order and readily available for inspection at any time.

6.1.4 公司应确保上述文件得到妥善保存。各部门以及控股子公司可以根据舜宇光学科技的相关制度要求制定详细的记录保存要求。

6.1.4 The Companies shall ensure that the above documents are properly maintained. Various departments and Controlled Subsidiaries may promulgate detailed record keeping requirements according to the relevant Policy of Sunny Optical.

6.1.5 如经政府主管部门合法要求，则公司应向主管部门提供相关文件及记录。

6.1.5 If legally required by the competent government authorities, the Companies shall provide relevant documents and records to the competent government authorities.

7 培训

7 Training

7.1 通用条款

7.1 General provisions

7.1.1 公司应制定出口管制法律培训计划，确保员工了解出口管制法律的最新动态。

7.1.1 The Companies shall develop a training program for the Export Control Laws to ensure that employees are informed about the latest developments thereof.

7.1.2 公司会定期组织培训，工作小组应保存培训记录。对于那些对经济制裁与贸易管制合规负有主要责任的员工，公司可根据需求，制定进一步的培训计划。

7.1.2 The Companies will organize training regularly, and the Working Group shall keep training records. For those employees who primarily take charge of economic sanctions and trade control compliance, the Companies may develop further training programs as necessary.

7.2 法律动态

7.2 Legal trends

7.2.1 工作小组应了解相关法律、法规和程序的最新动态，并向公司员工提供最新信息，以便使他们了解经济制裁与出口管制法律的最新动态。此外，还应向各部门以及各控股子公司发布法律法规的更新信息。

7.2.1 The Working Group shall stay up to date on the latest developments in relevant laws, regulations and procedures, and provide the Companies' employees with the latest information so that they can understand the latest developments in the laws on economic sanctions and export control. In addition, the Working Group shall present the updated information of laws and regulations to all departments and all Controlled Subsidiaries.

7.2.2 工作小组负责根据经济制裁与出口管制法律以及舜宇光学科技政策、程序和准则的变化，帮助员工树立并提升合规意识。

7.2.2 The Working Group shall be responsible for helping employees raise and refresh the compliance awareness in accordance with economic sanctions, the laws on economic sanctions and export control, and changes in Sunny Optical's policies, procedures, and guidelines.

8 审查及纠正措施

8 Audits and Corrective Actions

8.1 内部审计与审查

8.1 Internal audit and review

8.1.1 根据《风险管理制度》，工作小组定期进行贸易管制风险内部自查与检验，并且舜宇光学科技审计部也应当定期进行对公司的贸易管制合规制度审查，确保公司的贸易管制合规流程、程序和操作规程得到有效实施和维护，并向风险管理领导小组提交检查报告。

8.1.1 According to the *Risk Management Policy*, the Working Group shall regularly conduct internal self-examination and inspection of trade control risks, and Sunny Optical's audit department shall also periodically conduct a review of the Companies' trade control compliance policy to ensure that the Companies' processes, procedures and operating instructions for trade control compliance are effectively implemented and maintained, and submit inspection reports to the risk management Leading Group.

8.1.2 如果工作小组在检查报告中发现规定与执行间的差距，应制定并执行纠正措施，并及时报送公司领导小组或控股子公司总经理。

8.1.2 If the Working Group finds a gap between the regulations and the implementation in the inspection report, it shall formulate and take corrective measures, and promptly report to the Companies' Leading Group or the general managers of the Controlled Subsidiaries.

8.1.3 如有需要，可委托第三方专业人士协助进行审核。

8.1.3 If required, the internal review can be delegated to and assisted by a third-party qualified professional.

8.2 纠正措施

8.2 Corrective actions

8.2.1 公司应基于公司当前实施的内控体系以及内部审计的结果采取有效的纠正措施，以确保公司政策和本制度得到实施，并消除已发现的制度漏洞。

8.2.1 The Companies shall take effective corrective measures based on the Companies' current internal control rules and the results of internal audits to ensure that the Companies' guidelines and this Policy are implemented, and to eliminate identified vulnerabilities.

9 相关文件的制订与维护

9 Promulgation and Maintenance of Related Documents

9.1 公司将根据公司发展需求制定并维护其他相关文件，以进一步强调贸易管制合规的重要性，明确管理层承诺和员工应遵循的流程，确保进出口和交易流程合规，并在此基础上保证向客户顺利交付产品和服务。

9.1 The Companies will promulgate and maintain other relevant documents according to the Companies' needs to further emphasize the importance of trade control compliance, specify the management commitments and the procedures that employees are expected to follow, ensure compliance with export and transaction procedures, and accordingly guarantee smooth delivery of products and services to customers.

9.2 公司应对本制度和其他相关文件进行定期审查。

9.2 The Companies shall periodically review this Policy and other related documents.

10 附则

10 Miscellaneous

10.1 本制度经【舜宇光学科技总裁办公会议】批准，自发布之日起执行。

10.1 This Policy has been approved by the CEO Office Meeting of Sunny Optical and shall take effect as of the date of publication.

10.2 本规定解释权属于【舜宇光学科技风险管理领导小组】。

10.2 This Policy shall be interpreted by Risk Management Leading Group of Sunny Optical.