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## 1. 总则

### 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”）遵守各国家和地区（包括但不限于中国、美国、欧盟及其成员国等）的出口管制与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（简称“贸易管制合规”），特制定贸易管制合规制度（以下称“本制度”）。

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 “Company”), comply with the laws and regulations regarding export control and economic sanctions promulgated by various countries and regions (including but not limited to the People’s Republic of China, the United States, the European Union and its member states, etc.), and requiring the employees of the Company to properly handle matters related to export control and economic sanctions (hereinafter referred to as “Trade Control Compliance”).

- 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。

This Policy aims at establishing a standardized and effective Trade Control Compliance system, safeguarding the Company’s brand and reputation, and promoting the Company’s 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。

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

### Contents and Organizational System

- 2.1 公司按照适用的出口管制与经济制裁法律法规开展业务，包括但不限于进行产品、物料、服务和软件的进口、出口、采购、销售、装运、转运与技术转让。

The Company shall carry out its business operations, including but not limited to the import, export, purchase, sales, shipment, transshipment and technology transfer of products, materials, services and software in accordance with all applicable laws and regulations of export control and economic sanctions.

- 2.2 公司应将贸易管制合规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。

The Company shall incorporate Trade Control Compliance procedures into relevant business processes to ensure that the Company’s compliance control is carried out effectively.

- 2.3 公司各级管理人员和员工均应知晓，违反出口管制与经济制裁法律法规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，任何违反出口管制与经济制裁法律法规的行为都可能严重损害公司的品牌和声誉。

The managing personnel at all levels and employees of the Company must be aware that violations of the laws and regulations of export control and economic sanctions 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 laws and regulations of export control and economic sanctions may severely damage the Company's brand and reputation.

- 2.4 舜宇光学科技首席执行官主持集团贸易管制合规的全面工作，舜宇光学科技领导小组（以下称“**集团领导小组**”）负责本制度的总体工作，舜宇光学科技贸易管制合规工作小组（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首席执行官负责。舜宇光学科技审计监察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领导小组（与集团领导小组合称为“**领导小组**”）、贸易管制合规工作小组（与集团工作小组合称为“**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与经济制裁法律法规。

The CEO of Sunny Optical will preside over the overall work of Trade Control Compliance, the Leading Group of Sunny Optical (the “**Sunny Leading Group**”) shall be responsible for the overall implementation of this Policy, 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 Sunny Leading Group and the CEO of Sunny Optical. The Audit Department of Sunny Optical shall be responsible for supervising the implementation of this Policy. The General Managers of each Controlled Subsidiary shall lead the Trade Control Compliance work of the Controlled Subsidiaries to which they belong, and shall establish their respective leading group (collectively with the Sunny Leading Group, the “**Leading Group**”) and Trade Control Compliance working groups (collectively with the Sunny Working Group, the “**Working Group**”). The managing personnel at all levels and employees of the Company shall also be responsible for complying with the laws and regulations of export control and economic sanctions.

- 2.5 贸易管制合规的主要工作包括物项识别、交易相对方识别、交易识别、许可证申请、记录保存、培训和后续核查等。

The main sub-areas of Trade Control Compliance include item classification, counterparty screening, transaction screening, license determination, record keeping, training and follow-up verification, etc.

### 3. 管理层承诺

### Management Commitment

- 3.1 公司董事长、首席执行官、执行总裁及管理层承诺公司将完全遵守公司业务所适用的出口管制与经济制裁法律法规的各项规定，严格执行与公司业务有关且适用的贸易管制合规要求，建立一套行之有效的贸易管制合规体系，并配备必要的人员、资源与业务能力。

The Chairman, CEO, Executive President and management of the Company commit that the Company shall fully comply with all provisions of the laws and regulations of export control and economic sanctions applicable to its operation, and strictly implement the control requirements relevant, and establish an effective Trade Control Compliance system and be equipped with necessary personnel, resources and business capabilities.

- 3.2 公司将建立领导小组及工作小组，负责本制度日常工作的具体开展以及指导落实，履行公司对本制度的承诺。舜宇光学科技将要求各控股子公司负责本制度在其所在公司的落实运行，并要求审计监察部负责监督本制度的实施。

The Company will establish the Leading Group and the Working Group, to be responsible for the daily administration and providing guidance on the implementation of this Policy, and fulfilling the Company's commitments. Sunny Optical will require the Controlled Subsidiaries to be responsible for the implementation and operation of this Policy within its respective companies, and requires the Audit Department to be responsible for supervising the implementation of this Policy.

- 3.3 工作小组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合规制度得到遵守。

The Working Group and the General Managers of the Controlled Subsidiaries shall be responsible for explicitly communicating the management commitments to all employees and ensuring compliance with the Company's Trade Control Compliance policies.

## 4. 合规治理框架

### Compliance Governance Framework

#### 4.1 一般框架

##### General framework

- 4.1.1 工作小组负责关注和学习出口管制与经济制裁法律法规的更新并传达；负责总体指导公司实施本制度；负责提升公司贸易管制合规能力、推动贸易管制合规知识共享、提供必要工具以及协助解决贸易管制合规方面的问题，以此指导和帮助公司开展业务；负责将贸易管制合规的重大事项报领导小组进行审批。

The Working Group shall be responsible for monitoring and studying the updates to laws and regulations of export control and economic sanctions and communicating them, providing overall guidance on the Company's implementation of this Policy, developing the Company's Trade Control Compliance competence, driving the sharing of Trade Control Compliance knowledge, providing key tools and assisting in solving the issues concerning Trade Control Compliance, so as to guide and support the Company 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及人员，以遵守出口管制与经济制裁法律法规，并解决已发现的贸易管制合规事宜。

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 laws and regulations of export control and economic sanctions and resolving the Trade Control Compliance issues that have been identified.

- 4.1.3 如任何员工对出口管制与经济制裁法律法规存在疑问，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贸易管制合规工作小组的指导意见，控股子公司可以寻求集团工作小组的指导和建议。

If any employee or person has doubts relating to the laws and regulations of export control and economic sanctions 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 Trade Control Compliance working groups of the company where he or she works. Controlled Subsidiaries may 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，有权将相关交易上报。

The Company 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 职能与职责

Duties and responsibilities

- 4.2.1 各控股子公司应确定贸易管制合规相关的职能与职责，并分配给相关人员。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与经济制裁法律法规知识。

The Company shall determine the duties and responsibilities 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 laws and regulations of export control and economic sanctions.

### 5. 合规工作

Compliance Activities

#### 5.1 合规管控

Compliance management

5.1.1 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，包括但不限于：

- (1) 公司各部门机构、合规理念与合规过程的确立；
- (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) 对风险交易的识别；
- (5) 文件记录和保存。

The Company's Trade Control Compliance process aims at ensuring that the Company's various departments comply with this Policy, including but not limited to:

- (1) The Company's organizational structure and compliance Philosophy and Compliance Processes;
- (2) Export control classification of products, services, technologies and software sold and purchased by the Company;
- (3) Counterparty screening;
- (4) Screening of risk transactions; and
- (5) Documents and records keeping.

5.2 主要任务

Main sub-areas

5.2.1 贸易管制合规主要工作包括物项识别、交易相对方识别、交易识别、许可证申请、记录保存、培训和后续核查。

The main sub-areas of Trade Control Compliance include item classification, counterparty screening, transaction screening, license determination record keeping, training and follow-up verification.

5.2.2 物项识别

Item classification

5.2.2.1 公司应了解向供应商采购和向客户提供的产品、软件、技术和服务的性质，了解上述物项是否受管制，以及能基本了解出口管制分类号的判定方法。

The Company shall understand the nature of the products, software, technologies, and services procured from suppliers and provided to customers, understand whether such items are controlled, and possess a basic understanding of how to determine their Export Control Classification Numbers (ECCN).

5.2.2.2 公司在研发、制造全流程中，应对所使用的设备、软件、技术及相关物项开展合规识别与筛查，重点关注相关物项来源、属性及是否适用特定管制规则，并完整记录研发所用原材料、中间物项及最终物项信息，确保研发与生产流程可追溯；相关识别记录与文件按制度要求统一归档留存。

The Company shall conduct compliance identification and screening of equipment, software, technology and related items used throughout the R&D and manufacturing processes, with a focus on the origin and nature of such items and applicability of relevant control rules. It shall fully document raw materials, intermediate items and final new items used in R&D to ensure traceability of R&D and production

procedures. All relevant identification records and documents shall be filed and retained in accordance with the Company's policies.

5.2.2.3 军民两用物项和其他受控物项的所有进口、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）应遵守适用的所有与军民两用物项和其他受控物项有关的法律法规。

All imports, exports, sales and transportation (including controlled transfers, such as granting 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.

5.2.2.4 作为物项识别工作的一部分，公司应注意交易中是否存在风险信号，并对向客户提供的物项的最终用途进行监督。

As a part of the item classification rules, the Company shall be alert to any red flags in transactions and monitor the end-use of items provided to customers.

#### 5.2.3 交易相对方识别

##### Counterparty Screening

（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，即检查一个实体、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。

The counterparty screening is a compliance control procedure used to prevent the Company from conducting transactions with entities and individuals subject to restrictive measures. It involves verifying whether an entity, any person that directly or indirectly controls such entity, or any individual having an interest relationship with the Company (e.g., suppliers, customers, freight forwarders, or other counterparties) is included on any sanctions or control list.

（2）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。

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

#### 5.2.4 交易识别

##### Transaction screening

5.2.4.1 中国、美国、欧盟及其成员国等国家和地区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。制裁形式包括外交制裁、军事制裁、旅行禁令、贸易限制和经济制裁。

China, the United States, the European Union and its member states, and other countries and regions 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. The forms of sanctions include 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，禁止与受制裁国家内特定行业、实体、金融机构或个人进行交易。

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.

5.2.4.3 公司应审查所有交易的贸易管制合规风险，包括审查交易物项是否受管制、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、个人采取的出口管制和经济制裁措施，以确保交易不会违反上述制裁。

The Company shall review all transactions for trade compliance risks, including assessing whether the items involved are controlled, whether the counterparty to the transaction and other relevant entities are located in or involve sanctioned countries, entities, or individuals, and whether the Company is complying with the export control and economic sanctions measures imposed on such countries, entities, or individuals, so as to ensure that the transactions do not violate the aforementioned sanctions.

5.2.4.4 公司应核实所有交易（包括进口、出口、采购、销售、装运、转运与技术转让等）的情况，并确保遵守相关出口管制与经济制裁法律法规，包括但不限于中国、美国、欧盟及其成员国等其他国家和地区的法律法规。

The Company shall verify all transactions (including import, export, re-export, domestic transfer, procurement, sales, shipment, financing, technology transfer, etc.), and ensure compliance with relevant laws and regulations of export control and economic sanctions, including but not limited to the laws and regulations of China, the United States, the European Union and its member states, and other relevant countries and regions.

#### 5.2.5 许可证申请

##### License application

5.2.5.1 依据具体的出口管制与经济制裁法律法规的规定，涉及受管制物项、交易相对方或国家的特定交易（出口、销售或转让相关产品；允许特定的受限方接触受控物项；以及开展涉及受制裁国家或实体的经济活动）可能需要相关部门申请许可证或完成相关申报、登记、备案程序（如需）。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。

Subject to the regulation of specific laws and regulations of export control and economic sanctions, a license or completing necessary declaration, registration, or filing procedures (as applicable) 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.

5.2.5.2 公司应注意中国、美国以及其他国家的法律域外适用情况。

The Company shall be aware of the extraterritorial application of laws in China, the United States, and other countries.

#### 5.2.6 后续核查

##### Follow-up verification

(1) 在实际装运或转移物项之后，交易进行中及完成后，公司还应对贸易管制合规风险进行跟踪与后续核查，包括交易相对方、最终用户和最终用途是否被出口管制与经济制裁法律法规所制裁或限制、是否出现潜在的风险信号等。

After the items are shipped or transferred, in the course of conducting the transaction and after the transaction is completed, the company shall also conduct tracking and follow-up verification of trade control compliance risks, including the end user and end use of the items, whether the counterparty is sanctioned or restricted by the laws and regulations of export control and economic sanctions, whether there are potential risk indicators, etc.

### 6. 记录保存

#### Record keeping

##### 6.1 记录保存要求

##### Requirements for recordkeeping

- 6.1.1 公司应保存至少十（10）年的与贸易管制合规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。

The Company shall maintain transaction information and records related to Trade Control Compliance i for a minimum period of ten (10) years or such longer period required by applicable law.

- 6.1.2 相关交易信息和记录包括商业发票、进出口报关文件、提单、许可证、交易文件，以及包含以下信息的其他文件：物项描述，物项的原产国，物项的数量和价值，出口商和收货人的名称和地址，与尽职调查活动相关的记录，物项的最终用途和最终用户，以及其他公司认为需要保存的文件。

Transaction information and records shall include commercial invoices, export declaration documents, import declaration documents, bills of lading, licenses and other documents containing the following information: Description of the items; Country of origin of the items; Quantity and value of the items; Name and address of the exporter and consignee; Records related to due diligence activities; End use and end user of the items; Other files that the Company deems necessary to be preserved.

- 6.1.3 公司应妥善保存上述文件的原件，并存放于适当地点，确保扫描件或复印件随时可供检查。公司可以根据集团《档案管理办法》制定详细的记录保存要求。

The Company shall ensure that the above original documents are properly maintained and store them at appropriate locations, ensuring that scanned or photocopied versions are readily available for inspection. The Company may establish detailed record retention requirements in accordance with the Group's Archives Management Measures.

6.1.4 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。

If legally required by the competent government authority, the Company shall provide the relevant documents and records.

## 7. 培训

### Training

#### 7.1 通用条款

##### General provisions

7.1.1 为确保本制度的成功实施，公司应关注出口管制与经济制裁法律法规的更新，并制定培训计划，确保员工了解法律法规的最新动态。对于主要负责贸易管制合规工作的员工，公司可根据需要制定进一步的培训计划。

To ensure the successful implementation of this Policy, the Company shall keep abreast of the latest developments in laws and regulations of export control and economic sanctions and develop a training program to ensure that employees are informed about the latest developments thereof. For those employees who primarily take charge of Trade Control Compliance, the Company may develop further training programs as necessary.

7.1.2 公司可根据实际情况定期组织培训，工作小组应保存培训记录。

The Company will organize training regularly, and the Working Group shall keep training records.

## 8. 审查及纠正措施

### Audits and Corrective Actions

#### 8.1 审核与审查

##### Audit and review

8.1.1 工作小组及审计监察部对本制度实施情况进行检查，确保公司的贸易管制合规流程、程序 and 操作规程得到有效实施和维护，并向公司领导小组报告。

The Working Group and Audit Department shall monitor the implementation status of this Policy to ensure the Companies' Trade Control Compliance processes, procedures, and operational protocols are effectively implemented and maintained, and submit inspection reports to the Leading Group.

8.1.2 如果检查中发现本制度执行与规定存在差距，工作小组应制定纠正措施，舜宇光学科技相关部门或控股子公司应配合进行整改。

If the Working Group finds a gap between the regulations and the implementation during the inspection, it shall formulate and take corrective measures, and the relevant departments or Controlled Subsidiaries of Sunny Optical shall cooperate in implementing the rectifications.

8.1.3 公司应依据最新出口管制与经济制裁法律法规及内部审计结果，采取有效的纠正措施，确保本制度符合最新监管要求，消除合规风险隐患。

The Company shall take effective corrective measures based on the current laws and regulations of export

control and economic sanctions and the results of internal audits to ensure that the Company's guidelines and this Policy complies with the most current regulatory requirements, and eliminate potential compliance risks.

- 8.1.4 若发生违规事件，公司应开展全面风险评估，并将该事件作为后续同类型业务交易识别的重要参考依据。

In the event of a violation, the Company shall conduct a comprehensive risk assessment and use this event as a key reference for the identification of subsequent similar transactions.

- 8.1.5 如有需要，公司可委托第三方专业人士协助进行检查。

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

## 8.2 政府调查

### Government Investigations

- 8.2.1 如果公司任何员工收到政府机构发出的与出口管制与经济制裁违规相关的传票、调查令、搜查令或其他文件请求，应立即联系员工所在部门负责人，由其请求工作小组协助处理。

If any employee of the Company receives any subpoena, investigation order, search warrant, or other document request related to violations of export controls and economic sanctions from any government agency, they should immediately contact the head of their department, who will request assistance from the Working Group.

- 8.2.2 如果舜宇光学科技任何部门及控股子公司收到政府机构发出的与出口管制与经济制裁违规相关的传票、调查令、搜查令或其他文件请求或遇政府机构的代表或执法人员稽查，应立即联系工作小组。在此期间，舜宇光学科技任何部门或各控股子公司员工不应干涉或妨碍政府机构的代表或执法人员执行其职责。若政府机构的代表或执法人员对员工进行任何形式的问询、询问、讯问，该等员工不应以任何理由隐瞒事实。

If any department or Controlled Subsidiaries of Sunny Optical received any subpoena, investigation order, search warrant, or other document request related to violations of export controls and economic sanctions from any government agency, or be inspected by representatives or law enforcement officers from any government agencies, they should immediately contact the Working Group. . During this time, employees of any department or Controlled Subsidiaries should not interfere with or hinder the representatives or law enforcement officers from performing their duties. If representatives or law enforcement officers question any employee in any form, such employees shall not conceal any facts for any reason.

## 9. 相关文件的制订与维护

### Promulgation and Maintenance of Relevant Documents

- 9.1 工作小组根据实际情况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，确保交易合规。

The Working Group will promulgate and maintain other relevant documents according to the Company's

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.

## 10. 附则

### Miscellaneous

- 10.1 本制度自发布之日起生效并执行。

This Policy shall take effect and be implemented from the date of publication.

- 10.2 本制度解释权属于【舜宇光学科技贸易管制合规工作小组】。

This Policy shall be interpreted by of the Trade Control Compliance Working Group of Sunny Optical.