

关于贸易管制合规的管理层承诺声明

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”）致力于遵守所有可适用的贸易管制及经济制裁法律法规。为确保舜宇建立与持续深化贸易管制合规项目，并促使员工妥善处理与贸易管制与经济制裁相关事务，舜宇董事长代表全体董事会成员郑重承诺：

Sunny Optical Technology (Group) Co., Ltd. and its holding subsidiaries (collectively referred to as “SUNNY”) are committed to complying with all applicable trade control and economic sanctions laws and regulations. In order to ensure that SUNNY establishes and continuously deepens trade control compliance projects and urges employees to properly handle matters related to trade control and economic sanctions, the Chairman of SUNNY hereby on behalf of all members of the board solemnly promises:

1. 舜宇将完全遵守其业务所适用的贸易管制与经济制裁法律法规的各项规定，严格执行与业务相关且适用的管制要求，并确认舜宇应当拥有一套行之有效的贸易管制与经济制裁合规体系，为此提供充分的资源与专业支持，配备必要的人员、资源与业务能力。

1. SUNNY shall fully abide by the provisions of trade 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 and economic sanctions compliance system, provide sufficient resources and professional support, and equip necessary personnel, resources and business capabilities.

2. 风险管理领导小组负责总体工作，贸易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。审计部负责监督合规实施。

2. The Risk Management Leading Group is responsible for the overall work, and the Trade 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 compliance.

3. 舜宇的所有董事必须充分理解贸易管制和经济制裁法律法规如何适用于其工作，向合规人员报告任何潜在的合规问题或违规行为，确保记录、数据和信息的准确性和完整性，并予保存。

3. All directors of SUNNY must fully understand how trade control and economic

sanctions laws and regulations apply to their work, report any potential compliance problems or violations to the compliance personnel, and ensure the accuracy and integrity of records, data and information.

4. 舜宇组织并实施全面的贸易管制与经济制裁合规培训，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，并将不时补充与管制合规相关的其他内部规定和政策。

4. SUNNY organizes and implements comprehensive compliance training on trade control and economic sanctions, 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 control compliance from time to time.

5. 违反贸易管制和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、被列为受制裁方甚至被处以监禁，使舜宇与个人的声誉遭受重大损害。任何董事，如若被发现违反法律或政策，除需要受到舜宇的纪律处分外，还将承担法律责任。

5. Violation of trade 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 and even being sentenced to imprisonment, causing significant damage to the reputation of SUNNY and individuals. If any director is found to be in violation of laws or policies, he or she shall bear legal liability in addition to disciplinary action by SUNNY.

舜宇董事长: 

The Chairman of SUNNY: _____