

Suzhou SIP Hi-Tech Precision Electronics Co., Ltd.

2025 Trade Control Compliance Policy

(Last Updated: Jun 4, 2025)

苏州高泰电子技术股份有限公司 2025 年贸易管制合规政策

(最后更新日期: 2025 年 6 月 4 号)

## 1. Introduction

### 1. 引言

Suzhou SIP Hi-Tech Precision Electronics Co., Ltd. and its majority-owned or controlled subsidiaries and affiliates (collectively, the “**Company**”) are committed to complying with all applicable export control and economic sanctions laws and regulations (collectively, “**Trade Control Law**”). Accordingly, the Company promotes this Trade Control Compliance Policy (the “**Policy**”), setting forth the compliance requirements that all employees who work for the Company (the “**Company Personnel**”) must review, understand, and adhere to. This Policy applies to the Company and all Company Personnel. Each Company Personnel is responsible for fully supporting the Company’s compliance efforts.

苏州高泰电子技术股份有限公司及其控股的子公司和关联公司（统称为“**公司**”）承诺遵守所有适用的出口管制和经济制裁法律法规（统称为“**贸易管制法律**”）。因此，公司制定本《贸易管制合规政策》（“**本政策**”），以明确公司所有公司人员必须了解、理解并遵守的合规要求。本政策适用于公司及所有公司人员。每位公司人员均有责任全面支持公司的合规工作。

## 2. Policy Overview

### 2. 政策概述

The Trade Control Law incorporates applicable export control and economic sanctions laws and regulations enforced by the authorities of the United Nations, the United States, the European Union, the People’s Republic of China, and other jurisdictions where the Company operates and engages in business. The Trade Control Law imposes export restrictions on the export, reexport, or transfer (in-country) of certain commodities, software, technology, and the provision of services (collectively, “**Controlled Items**”) for national security and foreign policy reasons. Controlled Items include items for military use, “dual-use” items with both commercial and military applications, and items for other restricted end uses, such as nuclear, chemical, or biological weapons, or missile technology. The United States and certain other jurisdictions also impose territorial sanctions against designated countries and regions (collectively, “**Restricted Countries/Regions**”), as well as targeted restrictions against designated governments, companies, and individuals who are placed on various restricted party lists under the Trade Control Law (collectively, “**Restricted Parties**”).

贸易管制法律包括联合国、美国、欧盟、中华人民共和国及公司开展业务的其他司法管辖区所实施的相关出口管制和经济制裁法律法规。贸易管制法律对某些商品、软件、技术以及服务的出口、再出口或境内转移（统称为“**受控物项**”）施加了出口限制。其目的为国家安全及外交政策考量。

受控物项包括用于军事用途的物项、既有商业又有军事用途的“两用”物项，以及用于其他受限最终用途（如核、化学或生物武器，或导弹技术）的物项。

美国及其他部分司法管辖区还对特定国家和地区（统称为“**受限国家/地区**”）实施地域性制裁，并对特定政府、公司及个人实施有针对性的限制措施（这些政府、公司和个人被列入贸易管制法律下的各种受限方名单，统称为“**受限方**”）。

### 3. Key Policy Principles

#### 3. 核心政策原则

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

本政策要求公司人员遵守以下义务和原则：

- No transactions are to be conducted by or on behalf of the Company contrary to applicable Trade Control Law.
- 不得代表公司进行任何违反适用贸易管制法律的交易。
- The Company currently does not manufacture Controlled Items. Controlled Items and U.S.-origin items shall not be exported, reexported, or transferred (in-country) in any form before obtaining required export licenses.
- 公司目前不制造受控物项。不得在未取得必要出口许可的情况下，以任何形式出口、再出口或境内转移受控物项或美国原产物项。
- Without a compliance assessment and proper due diligence process, no Controlled Items and U.S.-origin items can be transferred to third countries or third parties (including an intra-company transfer of items subject to the U.S. Export Administration Regulations from subsidiaries and affiliates of the Company to Restricted Parties).
- 未经合规评估和适当的尽职调查，不得将受控物项及美国原产物项转移至第三国或第三方（包括公司子公司或关联公司向受限方转移受美国《出口管理条例》管辖的物项）。
- No business dealings, directly or indirectly, are permitted with any parties located, headquartered, or registered in Restricted Countries/Regions.
- 禁止与位于、总部设在或注册在受限国家/地区的任何方开展直接或间接的业务往来。

- No business dealings, directly or indirectly, are permitted with any Restricted Party, to the extent such business is legally prohibited by the applicable Trade Control Law or lacks required authorization or licensing.
- 禁止与任何受限方开展直接或间接的业务往来，除非适用的贸易管制法律明确允许或已获得所需授权或许可。
- Company personnel shall not knowingly export, reexport, or transfer (in-country) any Controlled Items for any prohibited end user or end use under applicable Trade Control Law.
- 公司人员不得明知地将任何受控物项项目出口、再出口或境内转移用于根据适用的贸易管制法律任何受禁止的最终用户或最终用途。
- For all technical cooperation or communication, the Company and Company Personnel must make clear that the outcomes are for civil end-use only.
- 在所有技术合作或交流中，公司及公司人员必须明确表明结果仅限于民用用途。
- Company personnel shall take steps to record accurate and complete information related to export activities in daily work operations, and maintain such records in the proper locations pursuant to the Company's procedures.
- 公司人员在日常工作中应记录与出口活动相关的准确和完整信息，并按照公司的流程规定保存在指定的位置。
- Report any actual or potential compliance issues or violations to the Company if you suspect or become aware of any non-compliance action by Company Personnel.
- 如怀疑或知悉任何公司人员存在违反合规要求的行为，应向公司报告实际或潜在的合规问题或违规行为。

Violations of the Trade Control Law may result in significant consequences for the Company and responsible individuals, including criminal and/or civil fines, being designated as a restricted party under the Trade Control Law, as well as damage to the Company's reputation. Anyone found to violate the Trade Control Law or the Policy will be subject to significant disciplinary actions by the Company, up to and including termination, in additional legal liabilities.

违反贸易管制法律可能对公司及相关责任人员造成严重后果。包括刑事或民事罚款、被列入受限方名单，以及公司声誉受损。任何违反贸易管制法律或本政策的人员将面临公司严厉的纪律处分，包括但不限于解除劳动合同，以及其他法律责任。

#### 4. The Company's Commitment to Trade Control Compliance and Expectation of Business Partners

##### 4. 公司对贸易管制合规的承诺及对业务合作伙伴的期望

The Company is dedicated to providing resources, time, investment, and personnel to ensure its compliance with Trade Control Law and the implementation of an effective trade compliance program throughout its global business operations. The Company's management fully supports the compliance efforts and will work with each employee to enhance the Company's trade compliance program.

公司致力于投入资源、时间、资金和人员，确保公司遵守贸易管制法律，并在全球业务运营中实施有效的贸易合规体系。公司管理层将全力支持合规工作，并与每位公司人员协作，不断提升公司的贸易合规项目水平。

This Policy will be communicated to the Company's customers, suppliers, and other business partners, such as consultants, freight forwarders, sales representatives, or any party having business dealings with the Company (collectively, "**Business Partners**"). The Company expects and seeks strong support from its Business Partners to not only maintain compliance with applicable Trade Control Law for business dealings with the Company, but also cooperate with the Company to provide us with export control information (including export control classification, end user and end use information) specific to any items supplied to or received from the Company.

本政策将传达给公司的客户、供应商以及其他业务合作伙伴，如顾问、货运代理、销售代表或与公司有业务往来的任何其他方（统称为“业务合作伙伴”）。公司期望并寻求业务合作伙伴的大力支持，不仅要在与公司进行业务往来时遵守适用的贸易管制法律；还应积极配合公司，针对公司提供的具体物项提供相关的出口管制信息（包括出口管制分类、最终用户和最终用途信息）。

If you have any questions concerning this Policy, please contact **Trade Compliance Department : Simon、Echo [compliance@hitechtape.com](mailto:compliance@hitechtape.com)**.

如您对本政策有任何疑问，请联系：

贸易合规部：周鹏程、董广德 [compliance@hitechtape.com](mailto:compliance@hitechtape.com)