

## **Compliance statement for export control of Nubia products**

It is the policy of Nubia to comply with global export control laws and regulations including those of China, the United States, European Union and other relevant jurisdictions. You may not use, sell, supply, or otherwise export, re-export or transfer Nubia products except in strict accordance with these laws. By purchasing or using Nubia products, you further confirm that the Nubia products will not be exported, re-exported or transferred directly or indirectly (i) to or for use in countries or territories subject to comprehensive U.S. economic sanctions or (ii) to or for use in or by any individual or entity on restricted party lists maintained by China, the United States, European Union or other relevant government authority (or anyone owned by or acting on behalf of such individual or entity) unless reviewed and approved by Nubia. Additional information regarding the Export Control Compliance policy of Nubia is available at

<https://www.nubia.com/active/ff360992019fe95.html?#1>

SUBJECT: Open Letter and Notice to Directors, Officers, Employees, Contractors, Suppliers, and Business Partners Regarding Prohibited Transfers of Items Subject to the EAR to Restricted Regions

ZTE Corporation and its subsidiaries and branches (collectively, "ZTE") are fully committed to compliance with all applicable export control and economic sanctions laws and regulations. It is ZTE policy to fully comply with all local rules and regulations. This includes compliance with the economic sanctions and export control laws and regulations of the countries in which it operates and conducts business. Compliance with these laws and with ZTE's Export Compliance Program are essential requirements for ZTE's employees, contractors, and businesses.

ZTE hereby informs its leadership, management, employees, contractors, suppliers, and others who deal in items subject to the U.S. Export Administration Regulations ("EAR") that transfers of such items to Iran, North Korea, Syria, Cuba, and Crimea, are generally prohibited. This prohibition applies to all U.S.-origin items and non-U.S.-origin items containing more than the applicable de minimis content by value (as set forth in the EAR). The only exceptions to this prohibition are transfers that are authorized (1) by the EAR, (2) by the regulations administered by the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC"), and (3) by the U.S. Government through the issuance of a license.

It is current ZTE policy to not conduct business with any parties located, headquartered, registered, or operating in countries or regions that are sanctioned by the United States (currently Iran, Sudan, Syria, North Korea, Cuba, and Crimea). It is ZTE policy to not do business directly or indirectly related to these countries or regions even if the transaction does not involve items subject to the EAR.

A violation of the export control and economic sanctions laws and regulations may result in serious legal consequences for a company or other entities and responsible individuals. These consequences include (but are not limited to) fines, trade restrictions, criminal prosecution, and imprisonment. ZTE is committed to abiding by all applicable export control and economic sanctions laws and regulations worldwide, and ZTE will implement measures to ensure compliance with all legal requirements relating to exports, re-exports and transfers (in-country) of hardware, software and technology.

ZTE expects and calls for our directors, officers, employees, customers, suppliers and other business partners to:

1. Fully understand and strictly comply with all applicable domestic and international export control law and economic sanctions laws and regulations.
2. For all hardware, software and technology provided to ZTE, provide the applicable export control classification information and supporting documents to ZTE during sales, supply and licensing. This includes informing ZTE whether the items being provided to ZTE are subject to

the EAR and, if the items are subject to the EAR, ZTE must be provided with (i) the Export Control Classification Numbers (ECCNs) of the items and (ii) any export license or license exceptions used to provide the items to ZTE (e.g. License Exception CIV). ZTE will also require its suppliers to provide relevant export classification and licensing information for items that are not subject to the EAR.

3. Ensure that, unless all appropriate licenses or other authorizations are obtained pursuant to applicable laws and regulations prior to any such transfer, no hardware, software or technology will be:

A. Provided directly or indirectly to or for use in countries or regions that are sanctioned by the United States (currently Iran, Sudan, Syria, North Korea, Cuba, and Crimea);

B. provided directly or indirectly to or for use by entities or individuals on any Chinese, UN, EU, US or other list of sanctioned/restricted parties;

C. used in a manner otherwise prohibited under the EAR or other applicable export control or economic sanctions laws and regulations.

4. Keep a complete record pertaining to destination, end user and end use of exports, re-exports and transfers (in-country) of ZTE hardware, software and technology, and promptly provide all such records upon ZTE's reasonable request.

Compliance with U.S. export control regulations is an essential requirement for ZTE and its international business operations.

Chairman of ZTE

President of ZTE

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