

ZTE USA Inc, 2022 Export Control Compliance Management Commitment Statement**中兴通讯（美国）有限公司 2022 年关于出口管制合规的管理层承诺声明**

ZTE USA Inc, is fully committed to compliance with all applicable export control and economic sanctions laws and regulations.

中兴通讯（美国）有限公司完全致力于遵守所有可适用的出口管制和经济制裁法律法规。

All management fully support ZTE USA Inc,'s ongoing goal to have a world-class Export Compliance Program based on industry best practices.

全体管理层将全力支持中兴通讯（美国）有限公司的持续性目标，即基于行业最佳实践，打造世界一流的出口合规项目

ZTE USA Inc, 's Export Compliance Program will continue to be subject to audits, monitoring and assessments (including regular announced and unannounced site visits), by the Special Compliance Coordinator ("SCC"), appointed by the U.S. Department of Commerce, Bureau of Industry and Security.

中兴通讯（美国）有限公司的出口合规项目将继续接受由美国商务部工业安全局任命的特别合规协调员（“SCC”）的审计、监督和评估（包括定期进行事先告知或不予事先告知的现场访问）。

All directors, officers, employees and contract employees must comply with all applicable export control and economic sanctions laws and regulations as well as all policies and procedures promulgated by ZTE USA Inc, to ensure compliance. Under no circumstances will exports, re-exports or transfers (in-country) be made contrary to laws and regulations or policies by any individual or entity on behalf of ZTE USA Inc, .

所有董事、管理人员、员工和合同工都必须遵守所有可适用的出口管制和经济制裁法律法规以及中兴通讯（美国）有限公司确保合规而颁布的政策和流程。在任何情况下，任何个人或实体均不得代表中兴通讯（美国）有限公司在违反法律法规或政策的情况下开展出口、再出口或转移（国内）活动。

Anyone found to be in violation of the laws and regulations or policies will be subject to disciplinary actions by the Company, up to and including termination, in addition to legal responsibilities.

任何人如若被发现违反法律法规或政策，除需要承担法律责任外，还将受到公司的纪律处分，最高处分可至开除。

We ask each of you to continue to take this matter very seriously and to continue to report all export compliance concerns, questions, actual or potential violations that you identify.

请您务必持续严肃地对待此事，并上报您所发现的任何出口合规问题、疑问、实际或潜在违规行为。

If you have any questions about the policy or any particular activity, please contact ECPOC Meiyin Liu 00031383.

如果您对政策或者特定活动有任何疑问，请联系 ECPOC 刘美吟 00031383.

By signing this document, ZTE USA Inc, hereby agree and comply with the ZTE's Export Control Compliance Policy and Management Commitment Statement.

通过签署本文件，中兴通讯（美国）有限公司此声明同意和遵守中兴通讯的出口管制合规政策和管理层承诺声明。

Zhenping Sun

CEO of ZTE USA Inc,

Zhenping Sun

中兴通讯（美国）有限公司首席执行官



Appendix: ZTE's 2022 Export Control Compliance Management Commitment Statement

附件：2022 年中兴通讯关于出口管制合规的管理层承诺声明

ZTE's 2022 Export Control Compliance Management Commitment Statement

2022 年中兴通讯关于出口管制合规的管理层承诺声明

DATE: 15 September 2022

日期: 2022 年 9 月 15 日

TO: Directors, Officers, Employees and Contract Employees

致: 全体董事、管理人员、员工和合同工

FROM: Li Zixue, Chairman of ZTE Corporation

Xu Ziyang, President of ZTE Corporation

自： 李自学，中兴通讯股份有限公司董事长

徐子阳，中兴通讯股份有限公司总裁

SUBJECT: 2022 Export Control Compliance Management Commitment Statement

主题： 2022 年关于出口管制合规的管理层承诺声明

ZTE Corporation and its majority owned or controlled subsidiaries and affiliates (collectively, "ZTE") are fully committed to compliance with all applicable export control and economic sanctions laws and regulations. ZTE has committed and will continue to commit substantial resources to ensure compliance with applicable export control and economic sanctions laws and regulations around the world. Throughout this past year, ZTE has continued to expand its Export Compliance Program, including initiating new projects to implement enhanced compliance measures and providing additional internal and external training programs.

中兴通讯股份有限公司及其控股或控制子公司和附属机构（统称“中兴通讯”）完全致力于遵守所有可适用的出口管制和经济制裁法律法规。中兴通讯已经并将继续投入大量资源，确保在全球范围内遵守可适用的出口管制和经济制裁法律法规。在过去的一年里，中兴通讯持续深化其出口合规项目，包括设立旨在执行提升举措的新项目以及额外的内外部培训项目。

The Export Compliance Committee— which is the chief organization for ZTE's export compliance management—and all ZTE management fully support ZTE's ongoing goal to have a world-class Export Compliance Program based on industry best practices. This past year, ZTE made significant advancements in export compliance and will continue to build on that progress to further enhance its Export Compliance Program. It is the responsibility of every individual to fully support this effort.

中兴通讯出口合规管理的主要组织——出口合规委员会，以及中兴通讯全体管理层将全力支持中兴通讯的持续性目标，即基于行业最佳实践，打造世界一流的出口合规项目。过去的一年，中兴通讯在出口合规方面取得重大进展，并将继续在此基础上使得出口合规项目更上一层楼。每一位员工都有责任为此项工作提供全力支持。

ZTE's Export Compliance Program will continue to be subject to audits, monitoring and assessments (including regular announced and unannounced site visits), by the Special Compliance Coordinator ("SCC"), appointed by the U.S. Department of Commerce, Bureau of Industry and Security¹. Any failure to fully comply with ZTE's Export Control Compliance Policy and Management Commitment Statements regarding cooperation and honesty with the Export Control Compliance Department ("ECC") or the SCC will result in significant discipline up to and including termination.

¹ The term of the Monitor, James M. Stanton, ended as scheduled on March 22, 2022 (U.S. time).

中兴通讯的出口合规项目将继续接受由美国商务部工业安全局任命的特别合规协调员（“SCC”）的审计、监督和评估（包括定期进行事先告知或不予事先告知的现场访问）²。任何未能遵守中兴通讯的《出口管制合规政策》和《管理层承诺声明》中有关于与出口管制合规部（“ECC”）、SCC 诚信合作要求的行为，将导致严重的纪律处分，最高可至（包括）解除劳动关系。

Please review ZTE's 2022 Export Control Compliance Policy, and understand and follow the requirements of the Policy. All directors, officers, employees and contract employees must comply with all applicable export control and economic sanctions laws and regulations as well as all policies and procedures promulgated by ZTE to ensure compliance. Under no circumstances will exports, re-exports or transfers (in-country) be made contrary to laws and regulations or policies by any individual or entity on behalf of ZTE. For example, ZTE's import and export activities are subject to the Export Control Law of the People's Republic of China when certain products are subject to China dual-use controls. In addition, ZTE makes certain products incorporating U.S. content that are fully controlled by the U.S. export control and economic sanctions laws and regulations, including products subject to national security/dual-use controls. Accordingly, all directors, officers, employees and contract employees must fully understand how export control and economic sanctions laws and regulations apply to the work that they do, participate fully and in good faith in all applicable compliance training, report any actual or potential compliance issues or violations to the appropriate compliance personnel, ensure that business documents, records, data and information are accurate and complete and that required records are maintained and filed in the proper locations, and ask questions of BU Compliance Team, ECC or the Chief Export Compliance Officer (“CECO”) if they are uncertain as to what requirements might apply.

请审阅《2022 年中兴通讯出口管制合规政策》，理解并遵循该政策的要求。所有董事、管理人员、员工和合同工都必须遵守所有可适用的出口管制和经济制裁法律法规以及中兴通讯为确保合规而颁布的政策和流程。在任何情况下，任何个人或实体均不得代表中兴通讯在违反法律法规或政策的情况下开展出口、再出口或转移（国内）活动。例如，当特定产品受中国军民两用管制时，中兴通讯的进出口活动会受到《中华人民共和国出口管制法》管辖。又如，中兴通讯制造的特定产品会并入受美国出口管制和经济制裁法律法规管控的美国成分，包含因美国国家安全/军民两用管制规定而受控的产品。因此，所有董事、管理人员、员工和合同工必须充分理解出口管制和经济制裁法律法规如何适用于其工作，充分地、诚信地参与所有适用的合规培训，向适当的合规人员报告任何实际或潜在的合规问题或违规行为，确保业务文档、记录、数据和信息准确完整，并对上述信息做好记录保存，以及在合适的位置归档，

² 监察官（“Monitor”）James M. Stanton 的任期已于原定的 2022 年 3 月 22 日（美国时间）届满结束。

同时在不明确哪些要求可能适用时，向 BU 合规团队、出口管制合规部或首席出口管制合规官（“CECO”）提出咨询。

Violations of the export control and economic sanctions laws and regulations may result in serious consequences for ZTE and responsible individuals, including criminal and/or civil fines, sanctioned party designation and even imprisonment, or re-imposition of the Suspended Denial Order as well as damage to ZTE's and the individual's reputation. Anyone found to be in violation of the laws and regulations or policies will be subject to disciplinary actions by the Company, up to and including termination, in addition to legal responsibilities.

违反出口管制和经济制裁法律法规将为中兴通讯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，或者暂停的《拒绝令》被重新实施，同时使中兴通讯和个人的声誉遭受损害。任何人如若被发现违反法律法规或政策，除需要承担法律责任外，还将受到公司的纪律处分，最高处分可至开除。

Compliance not only protects value, but it also creates value. ZTE has been building its value for its customers, shareholders, and employees, through the dedication and vigilance to export compliance of every individual. We ask each of you to continue to take this matter very seriously and to continue to report all export compliance concerns, questions, actual or potential violations that you identify. If you have any questions concerning potential violations, procedural uncertainties, or if you have suggestions to improve our Export Compliance Program, please contact BU Compliance Team, ECC, the CECO, Compliance Audit Department, and/or other compliance reporting options listed in the appendix of this statement.

合规不仅守护价值，还能创造价值。通过每个人对出口合规的奉献与谨慎，中兴通讯一直在为我们的客户、股东和员工创造价值。请您务必持续严肃地对待此事，并上报您所发现的任何出口合规问题、疑问、实际或潜在违规行为。如果您就潜在违规行为、流程不确定性有任何疑问，或者您就改进出口合规项目有任何建议，请联系 BU 合规团队、出口管制合规部、首席出口管制合规官、合规稽查部，和/或通过本声明附录中列出的其他合规举报途径。

Li Zixue,

Chairman of ZTE Corporation

李自学，

中兴通讯股份有限公司董事长

Xu Ziyang,

President of ZTE Corporation

徐子阳，

中兴通讯股份有限公司总裁

Appendix

附录

Selected Points of Contact in ECC

出口管制合规部主要联络人

Name 姓名	Title 职务	Regional Responsibility 负责区域	Email 电子邮箱	Phone 电话
Koh Sow Koon (Lawrence Koh)	Chief Export Compliance Officer 首席出口管制合规官 Head of ECC 出口管制合规部主任	Global 全球	Lawrence.koh@zte.com.cn	China 中国: +86 157-6825-0208 Singapore 新加坡 +65 8499-9511
Xie Xianxin 谢贤新	Deputy Head of ECC 出口管制合规部副主任	Global 全球	Xie.xianxin@zte.com.cn	China 中国: +86 186-7553-6545
Wang Songtao 汪松涛	Director of Compliance 部长	China 中国	Wang.songtao@zte.com.cn	China 中国: +86 139-2655-9115
Hu Zhe 胡喆	Director of Compliance 部长	China 中国	Hu.zhe@zte.com.cn	China 中国: +86 138-2879-2755

Name 姓名	Title 职务	Regional Responsibility 负责区域	Email 电子邮箱	Phone 电话
Deng Yiqian 邓艺乾	Director of Compliance 合规总监	China 中国	Deng.yiqian@zte.com.cn	China 中国: +86 150-1280-6330
Zheng Weiwei 郑伟伟	Director of Compliance, China and APAC 中国和亚太地区, 合规总监	China and APAC 中国和亚太地区	Zheng.weiwei2@zte.com.cn	China 中国: +86 136-8880-5511
Mfundisi Ncube	Director of Compliance, MEA 中东和非洲, 合规总监	Middle East and Africa 中东和非洲	Mfundisi.ncube@zte.com.cn	UAE 阿联酋: +971 52 820 5519
Sergey Dovgulya	ECC Regional Contact of EU and Russia 欧洲以及俄罗斯出口管制合规区域接口人	Europe and Russia 欧洲和俄罗斯	Dovgulya.sergei@zte.com.cn	Russia 俄罗斯: +7 910 472 36 79
Debbie Mires	Director of Compliance, the Americas 美洲, 合规总监	The Americas 美洲	Debbie.mires@zte.com.cn	US 美国: +1 972-671-8885 X 81104

Compliance Reporting Options

合规举报途径

If you are uncomfortable reporting matters directly to ECC or BU compliance team, you can also utilize ZTE's other reporting options including some which allow you to remain anonymous.

如果您不希望直接向出口管制合规部或 BU 合规团队进行举报，您还可以利用中兴通讯其他举报方式（包括匿名的举报方式）进行举报。

- ZTE Compliance Audit Department 中兴通讯合规稽查部

Website 网站:

<https://www.zte.com.cn/china/whistleblowing/report> (for employees in China)

<https://www.zte.com.cn/global/whistleblowing/report> (for employees overseas)

Email 电子邮箱:

Complianceaudit@zte.com.cn

- LCM 法律合规管理系统:

<http://lcm.zte.com.cn> - Compliance Audit-Violation Report

<http://lcm.zte.com.cn> - 合规稽查 - 违规线索报告

- Letter/Visit 信函/亲临:

Compliance Audit Dept., ZTE R&D Building, 55 Hi-Tech South Road, Nanshan District, Shenzhen

深圳南山区科技南路 55 号，中兴通讯研发大楼，合规稽查部

- Independent third-party compliance reporting platform 独立第三方合规举报平台

Website 网站:

<http://www.tip-offs.com.cn/ZTE>

Email 电子邮箱:

ZTEWhistleblowing@tip-offs.com.cn

Hotlines 热线:

400-0707-099 (Mainland China)

400-0707-099 (中国大陆)

+ 8621-3313-8584 (Overseas, Hongkong, Macao and Taiwan)

+ 8621-3313-8584 (海外, 香港、澳门和台湾)

In addition to the above options for reporting actual or potential violations, the SCC team has also established the Special Compliance Coordinator Confidential Reporting Program for export compliance-related questions and concerns. The SCC reporting program can be accessed through:

除上述针对实际或潜在违规举报途径以外, SCC 团队也成立了针对出口合规相关疑问困惑的 SCC 保密举报计划。您可以通过以下途径访问 SCC 举报计划:

<https://sccforzte.ethicspoint.com>

or by calling the independent Compliance Reporting Line at +1-202-831-6700.

或通过拨打独立的合规举报热线+1-202-831-6700。

Violations or concerns can be reported directly to the SCC by sending emails to Reporting@scc1.org.

您可发送邮件至 Reporting@scc1.org, 向 SCC 团队举报违规行为或者其他问题。

Additional Resources -- Links for Export Compliance Manuals

额外资源 - 出口合规手册链接

1. ZTE Global Compliance Manuals for Export Controls and Economic Sanctions - Corporate-Level Manual
中兴通讯全球出口管制和经济制裁合规手册——总册
<http://pal.zte.com.cn/pal/openfiles/PalAssetView.aspx?AssetID=581937>
2. ZTE Global Compliance Manuals for Export Controls and Economic Sanctions - Manual for Research and Development
中兴通讯全球出口管制和经济制裁合规手册——研发分册
<http://pal.zte.com.cn/pal/openfiles/PalAssetView.aspx?AssetID=565953>
3. ZTE Global Compliance Manuals for Export Controls and Economic Sanctions - Manual for Supply Chain
中兴通讯全球出口管制和经济制裁合规手册——供应链分册
<http://pal.zte.com.cn/pal/openfiles/PalAssetView.aspx?AssetID=565950>
4. ZTE Global Compliance Manuals for Export Controls and Economic Sanctions - Manual for Sales and Marketing
中兴通讯全球出口管制和经济制裁合规手册——销售及市场营销分册
<http://pal.zte.com.cn/pal/openfiles/PalAssetView.aspx?AssetID=565951>
5. ZTE Global Compliance Manuals for Export Controls and Economic Sanctions - Manual for Engineering Services
中兴通讯全球出口管制和经济制裁合规手册——工程服务分册
<http://pal.zte.com.cn/pal/openfiles/PalAssetView.aspx?AssetID=565956>
6. ZTE Global Compliance Manuals for Export Controls and Economic Sanctions - Manual for Human Resources
中兴通讯出口管制和经济制裁全球合规手册——人力资源分册
<http://pal.zte.com.cn/pal/openfiles/PalAssetView.aspx?AssetID=565946>
7. ZTE Global Compliance Manuals for Export Controls and Economic Sanctions - Manual for Export Control Compliance Training
中兴通讯全球出口管制和经济制裁合规手册——出口管制合规培训分册
<http://pal.zte.com.cn/pal/openfiles/PalAssetView.aspx?AssetID=565945>

8. ZTE Global Compliance Manuals for Export Controls and Economic Sanctions -
Manual for Finance and Accounting
中兴通讯全球出口管制和经济制裁合规手册——财务与会计分册
<http://pal.zte.com.cn/pal/openfiles/PalAssetView.aspx?AssetID=565948>

9. ZTE Global Compliance Manuals for Export Controls and Economic Sanctions -
Manual for Information System Activities
中兴通讯全球出口管制和经济制裁合规手册——信息系统分册
<http://pal.zte.com.cn/pal/openfiles/PalAssetView.aspx?AssetID=565955>

10. ZTE Global Compliance Manuals for Export Controls and Economic Sanctions -
Manual for Investment
中兴通讯全球出口管制和经济制裁合规手册——投资分册
<http://pal.zte.com.cn/pal/openfiles/PalAssetView.aspx?AssetID=566523>

11. ZTE Global Compliance Manuals for Export Controls and Economic Sanctions -
Manual for Exhibitions and Other ZTE-Organized External Activities
中兴通讯全球出口管制和经济制裁合规手册——展会及其它自办类外部活动分册
<http://pal.zte.com.cn/pal/openfiles/PalAssetView.aspx?AssetID=565947>

12. ZTE Global Compliance Manuals for Export Controls and Economic Sanctions -
Manual for Mobile Devices
中兴通讯全球出口管制和经济制裁合规手册——终端分册
<http://pal.zte.com.cn/pal/openfiles/PalAssetView.aspx?AssetID=566013>

13. ZTE Global Compliance Manuals for Export Controls and Economic Sanctions -
Manual for Functional Field
中兴通讯全球出口管制和经济制裁合规手册——职能领域分册
<http://pal.zte.com.cn/pal/openfiles/PalAssetView.aspx?AssetID=565949>

14. ZTE Global Compliance Manuals for Export Controls and Economic Sanctions -
Manual for ECC
中兴通讯全球出口管制和经济制裁合规手册——出口管制合规部分册
<http://pal.zte.com.cn/pal/openfiles/PalAssetView.aspx?AssetID=583197>

The manuals above can be also obtained from the ECPOC of your unit.

以上的手册也可以通过所在单位的 ECPOC 获取。