

关于出口管制合规的管理层承诺声明

Management Commitment Statement of Export Control Compliance

日期：2021年02月25日

DATE: 25 February 2021

致：全体董事、管理人员、员工及合同工（顾问、实习生）

TO: Directors, Officers, Employees and Contract Employees (Consultants, Interns)

深圳市优必选科技股份有限公司（以下称“优必选”）作为全球顶尖的人工智能和人形机器人研发、制造和销售为一体的高科技创新企业，致力于遵守其注册地、开展业务所处国家和地区可适用的法律法规，包括经济制裁和出口管制法律法规的各项限制。此举不仅是为赢得合作伙伴和社会公众的信任，更能够有效规避和减少贸易风险，不断提升优必选在国际市场的持续竞争力。

UBTECH ROBOTICS CORP LTD (hereinafter referred to as “UBTECH” or “the Company”), one of the world’s famous artificial intelligence and humanoid robot R&D, manufacturing and sales of high-tech innovation enterprises, is committed to comply with any and all applicable laws, regulations of the places of incorporation and business location of UBTECH, including Economic Sanctions and Export Control. This commitment is not only to help us to win trust of partners and the public, but also to effectively avoid, reduce trade risks, and continuously improve the sustainable competitiveness of UBTECH in the international market.

鉴于上述认识，优必选管理层在此承诺：作为一家国际化科技企业，优必选将遵守中国政府颁布的所有与公司经营相关的出口管制法律法规以及美国、欧盟等其他国家的出口管制法律法规。与此同时，优必选完全支持中国政府的国际承诺，包括中国政府为执行联合国安全理事会

的有关决议而承担的国际义务。优必选将以“全面控制原则”指导公司出口管制合规机制的建立和实施，将出口管制合规义务置于优必选的商业利益之上。

In view of the above understanding and consensus, the management of UBTECH hereby promises: as an international technology company, UBTECH shall abide by all export control laws, regulations promulgated by the Chinese Government, the United States, the European Union and other countries under or in connection with the business activities of UBT. At the same time, UBTECH fully supports the Chinese government's international commitment achievements, including the international obligations to perform based on relevant UN Security Council resolutions. UBTECH shall establish and implement the Company's Export Control Compliance Mechanism based on the "full control principle", placing export control compliance obligations above UBTECH's commercial interests.

优必选要求与之往来的所有合作商（公司、组织和个人等）遵从出口管制法律法规，并履行相应的出口管制义务。优必选将竭尽全力对整个业务流程中涉及的第三方（包括但不限于客户、采购商、代理商、供应商、报关行、货运代理人等）进行不定期核查，一旦核实其违反出口管制法律法规，优必选必将拒绝与此类合作商进行业务往来，以防范潜在的出口管制风险。

UBTECH requires all partners (companies, organizations, individuals, etc.) to compliance with any and all export control laws, and perform corresponding export control obligations. UBTECH shall spare no effort to conduct irregular compliance verification on any third party involved in any business process of the Company (including but not limited to customers, purchasers, agents, suppliers, customs brokers, freight forwarders, etc.). Once verified that any partner violates or is going to violate any export control law, regulation, UBTECH shall refuse to conduct business with such partner in order to prevent any potential export control risk.

在组织机构方面，优必选设立合规遵从委员会，以确保公司出口管制合规机制有效实施。合规遵从委员会有权否决涉嫌违反出口管制法律法规的交易。公司管理层将给予合规遵从委员会及合规团队足额的资源，以支持出口管制机制有序运行。

As for the organizational structure, UBTECH has established Compliance Committee to ensure effective establishment and operation of the Company's Export Control Compliance Mechanism. The Compliance Committee is entitled to veto any transaction suspected of violating export control law. The management shall award the Compliance Committee and the Compliance Team with sufficient resources to support orderly operation of Export Control Compliance Mechanism of the Company.

在内部制度方面，优必选将不断制订和优化出口管制内部管理制度，建立遵从出口管制与出口审查的标准流程，保存相关文档信息，加强内部审计，并落实参与出口管制的各部门责任。同时，开展出口管制合规的宣传和培训，通过多层次、全方位的培训，不断提升优必选全体成员的合规意识，并差异化地传递具体业务的出口管制合规要求。

In terms of internal management regulations, UBTECH shall continue to formulate and optimize internal management regulations for export control, establish standard compliance procedures with export control and export review, keep relevant documents and information, strengthen internal audits, and implement the responsibility of export control at all departments. At the same time, UBTECH shall conduct publicity and training on export control compliance. Through multi-level and all-round training, it shall enhance and continuously improve compliance awareness of all members of UBTECH, and differentiates the delivery of export control compliance requirements for specific business.

优必选的董事、管理人员、员工等全体成员都必须遵守所有可适用的出口管制和制裁法律法规以及优必选为确保出口管制合规而颁布的政

策和流程。优必选将为此设立奖惩制度，对积极参与出口管制工作的员工给予奖励，对违反出口管制制度的员工进行通报批评与严厉处罚；违反相关法律法规的员工，还应依法承担法律责任。

All directors, officers, employees, and contract employees must comply with all applicable export control, sanctions laws and regulations as well as all policies and procedures promulgated by UBTECH to ensure export compliance. UBTECH shall set up a reward and punishment mechanism, to reward any employee who actively participates in export control work, and conduct notice of criticism and severe punishment against any employee who violates the export control regulations. Besides, any employee who violates relevant export control law should also bear all legal liabilities.

优必选意识到,在按照国内外合规要求确认敏感性客户、产品编码、产品最终用途等实际举措上，需要进一步与所有中国政府主管部门、相关非政府组织和出口管制专家建立和保持密切联系，以获取相关技术信息、寻求专业指导和权威建议。

UBTECH realizes that it needs to further establish and maintain close cooperation with all Chinese government authorities, relevant non-governmental organizations and export control experts to obtain relevant technical information, professional guidance and authoritative advice, such as identifying sensitive customers, product codes, and product end-uses in accordance with domestic and foreign export compliance requirements.

优必选的全体成员将为公司全面实现出口管制合规的目标做出努力，并严格执行相关政策。优必选将通过每一位成员对出口管制合规的奉献和谨慎，为我们的客户、股东、合作伙伴和员工不断地创造价值。

Any employee shall make efforts for the Company to fully achieve the goal of Export Control Compliance Mechanism and strictly implement all export control policies. UBTECH shall make its value for our customers, shareholders, partners and employees, through the dedication and vigilance to export control compliance implementation and

operation of every employee.

本声明适用于优必选的所有部门、控股子公司和分支机构。优必选将每年对本承诺进行审核与修订，积极探索出口管制合规工作的基本建设路径，并不断健全和优化出口管制管理机制。

This Commitment Statement applies to all departments, holding subsidiaries and branches of UBTECH. UBTECH shall review and revise this Commitment Statement, to actively explore the basic path of export control compliance, and continue to improve and optimize the Export Control Management Mechanism.

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UBTECH's Whistleblower Contacts: compliance@ubtrobot.com

董事长：



Chairman:

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