

## 关于数据合规的管理层承诺声明

### Management Commitment Statement of Data Protection

日期：2021 年 12 月 21 日

DATE: 21st December 2021

致：全体董事、管理人员、员工及合同工（顾问、实习生）

TO: All Directors, Managers, Employees and Contractors (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，包括个人数据保护和数据跨境流通的各项限制。此举不仅是为赢得合作伙伴和社会公众的信任，保障员工、客户个人权利及社会公共利益，更能够有效规避和减少数字贸易和数据跨境流通风险，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 top high-tech innovation enterprises that researches and develops, manufactures, sales artificial intelligence and humanoid robots, is committed to comply with laws and regulations applicable to all countries and regions where UBTECH has company registration and runs business, including all the restrictions of personal data protection and international transfers. This commitment is not only to help us to gain trust of partners and the public, but also to effectively reduce and avoid the risks of digital trade as well as international transfers, and constantly 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及开展业务所处国家和地区颁布的所有与个人

相关的数据安全与隐私保护法律法规。优必选将以“隐私是用户和员工的基本权利”为原则指导公司数据合规体系的建立和实施，将用户的数据安全和隐私保护义务置于优必选的商业利益之上。与此同时，优必选完全支持中国政府发起的《全球数据安全倡议》，包括遵守中国加入的相关国际协定中的数据跨境流动规则。

In view of the above understanding, the management of UBTECH hereby commits: as an international technology company, UBTECH shall abide by all the laws and regulations of personal data security and privacy protection enacted by the Chinese government as well as the countries and regions where it runs business. UBTECH shall guide the establishment and implementation of the company's data protection mechanism based on the principle of "privacy is the basic right of users and employees", placing the obligations of users' data security and privacy protection above the commercial interests of UBTECH. Meanwhile, UBTECH fully supports "Global Initiative on Data Security" initiated by the Chinese government and the rules of international transfers in the relevant international agreements that China has joined.

优必选要求与之往来的所有合作商（公司、组织和个人等）遵从数据安全与隐私保护法律法规，并履行相应的个人数据保护义务。优必选将竭尽全力对整个经营管理流程中涉及个人数据收集、存储、使用、加工、传输、提供、公开、出境、销毁的合作方（包括但不限于第三方 SDK、开源组件、服务商、代理商、供应商，关联方等）进行谨慎评估和不定期核查，如核实其违反数据安全和隐私保护相关法律法规，优必选将考虑拒绝与此类合作方进行业务往来，以防范潜在的个人数据保护风险。

UBTECH requires all its partners, including companies, organizations, individuals, to comply with laws and regulations of data protection, and fulfill corresponding personal data protection obligations. UBTECH shall make every effort to carefully evaluate and irregularly inspect the partners (including but not limited to third party SDKs, open source components, service providers, agents, suppliers, affiliated parties) involved in the

collection, storage, usage, processing, transmission, provision, disclosure, international transfers and destruction of personal data in the entire business management process. If it is verified that partners violate laws and regulations related to data security and privacy protection, UBTECH shall consider refusing to cooperate with such partners in order to prevent potential risks of personal data protection.

在组织保障方面，优必选采取自上而下的组织和流程机制，设立了合规遵从委员会、数据保护联合工作组等专职机构和专职人员，并将不断建立和健全数据合规内部管理制度和流程，制定和完善符合公司业务发展的数据安全与隐私保护规范和标准，落实数据合规相关各部门和人员的责任。同时定期开展内外部审计，定期开展多层次、全方位的数据合规意识、培训、教育等专题活动，不断提升优必选全体成员的数据合规意识，以确保公司数据合规体系有效实施。合规遵从委员会有权否决不符合数据安全与隐私保护流程规范的业务上线和发布。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，以支持数据合规机制有序运行。

In terms of organization support, UBTECH adopts a top-down organization and process mechanism, has established full-time institutions such as the Compliance Committee and the Data Protection Joint Working Group as well as full-time staff, and shall continue to establish and complete internal data protection mechanism and processes, formulate and improve data security and privacy protection specifications and standards that in line with the company's business development, and implement the responsibilities of the departments and personnel related to data protection. Meanwhile, internal and external audits are regularly conducted, and multi-levelled, all-round data protection awareness, training, education and other special events are regularly organized to constantly improve the data protection awareness of all members of UBTECH to ensure the effective implementation of the company's data protection mechanism. The Compliance Committee has the right to veto business that does not conform to the specification of data security and privacy protection procedures. The management of the

company shall give the Compliance Committee and the compliance team sufficient resources to support the orderly operation of the data protection mechanism.

在技术保障方面，优必选将不断跟踪物联网、云计算服务、机器视觉、语音交互、人工智能、隐私计算等新兴技术、新兴领域的数据安全与隐私保护风险，深入探索特定场景下的数据安全和隐私保护技术，创新数据合规产品设计和实践，捍卫用户和员工的基本权利。

In terms of technical support, UBTECH shall continuously to track the risks of data security and privacy protection in emerging technologies as well as fields such as the internet of things, cloud computing services, machine vision, voice interaction, artificial intelligence, privacy computing, deeply exploring data security and privacy protection technology in specific scenarios, introducing privacy by design to product development, so as to defend the basic rights of users and employees.

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数据安全与隐私保护法律法规，以及优必选为确保数据合规而颁布的各项政策和流程。优必选将为此设立奖惩制度，对积极参与数据合规工作的员工给予奖励，对违反数据合规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 members, including directors, managers, and employees of UBTECH, must abide by all applicable laws and regulations of data security and privacy protection as well as all policies and procedures promulgated by UBTECH to ensure data protection. For this purpose, UBTECH shall establish systems of rewards and punishments. Employees who actively participate in data protection shall be rewarded, employees who violate the data protection mechanism shall be criticized in a circulated notice and severely penalized. Employees who violate relevant laws and regulations should also take legal responsibility in accordance with the law.

优必选意识到，在按照国内外差异化的个人数据保护监管要求确定

数据安全保障、数据跨境流通、隐私设计与透明可控等实际举措上，需要进一步与数据管辖范围所在国政府主管部门、产业上下游生态合作方、相关隐私保护专业组织和安全与隐私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 in regard to practical measures to ensure data security, international transfers, privacy design, transparency and managability in accordance with differentiated personal data protection regulatory requirements at home and abroad, it is necessary to further build and maintain close association with government authorities of the jurisdiction, upstream and downstream ecological partners of the industry, relevant privacy protection professional organizations, security and privacy experts to obtain relevant technical information as well as seek professional guidance and authoritative advice.

优必选的全体成员将为公司全面实现数据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数据合规的奉献和谨慎，为我们的客户、股东、合作伙伴和员工不断地创造价值。优必选将支持我们的员工和专家向社会输出我们在数据保护方面的实践经验，支持我们的产品和服务向生态伙伴开放我们的数据安全与隐私保护能力。

All members of UBTECH shall make efforts to fully achieve the goal of data protection for the company and strictly implement relevant policies. UBTECH shall continuously create value for our customers, shareholders, partners and employees through the dedication and care to data protection of each member. UBTECH shall support our employees and experts to output our practical experiences in data protection to the society, and support our products and services to open up our data security and privacy protection capabilities to ecological partners.

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，积极探索和学习全球、同行业、同领域的合规工作最佳实践，主动跟踪和遵循最新法律法规、标准规范、监管要求和趋势，并不断努力提升数据安全和隐私保护的能力成熟度。

This statement applies to all departments, holding subsidiaries and branches of UBTECH. UBTECH shall review and revise this commitment annually, not only shall actively explore and learn the best practices of data protection in the same industries and fields all over the world, but also shall forwardly track and comply with the latest laws and regulations, standards, regulatory requirements and trends, and constantly strive to improve the maturity of data security and privacy protection capabilities.

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2021年12月21日

21st December 2021