

# Compliance Policy Statement

## 合规声明

It is the policy of Cyphen to comply with international export control laws and regulations, including the requirements of Chinese and U.S. export controls. No Cyphen transaction that is contrary to this policy may be executed under any circumstance.

赛方科技交易政策遵循国际出口管制法律法规，包括中国和美国的出口管制要求。在任何情况下赛方科技不会违反本交易政策。

Without prior authorization from the US government, Cyphen's product may not be exported, re-exported, or sold, directly or indirectly, to:

未经美国政府事先授权，Cyphen 的产品不得直接或间接出口、再出口或销售给：

1. Any embargoed or sanctioned country, or customers who intend to use the Cyphen product for the production of items whose ultimate end-user is an embargoed or sanctioned country;

任何禁运或制裁国家，或打算使用 Cyphen 产品生产最终用户为禁运或制裁国家的产品的客户；

2. Persons and entities included on the consolidated lists of prohibited and restricted parties, including but not limited to any person or entity listed on the Denied Persons list, the Entity List or the Unverified List published by the U.S. Department of Commerce's Bureau of Industry and Security as well as the Office of Foreign Asset Controls Specially Designated Nationals list (herein collectively referred to as the "RPL" list), unless authorized by relevant Government if legal requirements need to be fulfilled;

列入禁止和限制方综合名单的个人和实体，包括但不限于列入美国商务部工业和安全局的拒绝人员名单、实体名单或未经核实名单的任何个人或实体以及列入外国资产管制办公室特别指定国民名单(在此统称为“RPL”名单)，如有法律规定，须经有关政府批准；

3. Any nuclear, chemical, or biological weapon or rocket, or missile or unmanned air vehicle (UAV), military intelligent end-use or end-user.

任何核、化学或生物武器或火箭、导弹或无人驾驶飞行器、军事情报最终用途或最终用户。

4. Other regulatorily restricted end use or end use per the product's ECCN.

其他监管限制的最终用途或产品 ECCN 规定的最终用途。