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DATE: August 10, 2018

日期：2018年8月10日

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

关于：就禁止向限制地区转移受EAR管控之物品致董事、管理人员、员工、合同工、供应商以及业务合作伙伴的公开信及通知

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.

中兴通讯股份有限公司及其子公司和分支机构（统称“中兴通讯”）全力遵守所有适用的出口管制与经济制裁的法律法规。中兴通讯的政策是完全遵守其运营及开展业务所处国家的所有相关法律和法规，其中包括遵守经济制裁和出口管制的各项法律法规。遵守以上法律法规以及中兴通讯的出口合规项目的各项要求是对中兴通讯员工、合同工和业务部门的基本要求。

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, Sudan, 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.

中兴通讯特此通知其领导层、管理层、员工、合同工、供应商以及所交易的物品受美国《出口管理条例》（EAR）管控的其他相关方：向伊朗、朝鲜、叙利亚、苏丹、古巴和克里米亚转让该类物品是被普遍禁止的。以上限制适用于所有美国原产物品或所含美国成分在价值上超过EAR规定的最小美国物料占比的非美国原产物品。仅有的例外包括通过（1）EAR，（2）美国财政部海外资产控制办公室（“OFAC”）实施之规定，或者（3）美国政府签发的许可证而获得授权的交易。

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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.

中兴通讯目前的政策是，不与位于、或其总部位于、或注册于或经营地位于受美国制裁的国家或地区（现为伊朗、苏丹、叙利亚、朝鲜、古巴和克里米亚地区）的任何当事方开展业务。中兴通讯的政策是即使交易不涉及受 EAR 管辖的物品，也不会直接或间接与这些国家或地区开展业务。

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.

违反出口管制和经济制裁法律法规的行为可导致公司或其他主体及责任人面临严重的法律后果。这些后果包括但不限于罚款、贸易限制、刑事起诉以及监禁。中兴通讯致力于遵守世界范围内所有适用的出口管制和经济制裁的相关法律法规，中兴通讯也将采取措施确保其遵守与硬件、软件以及技术的出口、再出口和转移（国内）相关的所有法律法规。

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

中兴通讯期待并号召我们所有董事、管理人员、员工、客户、供应商和其他业务合作伙伴：

1. Fully understand and strictly comply with all applicable domestic and international export control law and economic sanctions laws and regulations.

充分理解并严格遵守所有适用的国内、国际出口管制和经济制裁的法律法规。

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.

对所有向中兴通讯提供的硬件、软件和技术，在出售、供应和授权期间，提供适用的出口管制分类信息以及支持性文件。以上包括通知中兴通讯其所提供给中兴通讯的物品是否受 EAR 管控，如

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果物品受 EAR 管控，则必须向中兴通讯提供 (i) 物品出口管制分类编号 (ECCNs)，以及 (ii) 用于向中兴通讯提供物品的任何出口许可证和许可证例外（例如：许可证例外 CIV）。中兴通讯还将要求其供应商为不受 EAR 管控的物品提供相关的出口分类和许可信息。

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.

确保，除非在任何此类转移以前就已根据相关法律法规获得所有适当的许可或者其他授权，否则任何硬件、软件或者技术都将不会：

- A. 被直接或者间接提供给受美国制裁的国家或地区或者在其中使用（这些国家和地区目前包括伊朗、苏丹、叙利亚、朝鲜、古巴和克里米亚地区）；
 - B. 被直接或者间接提供给任何受中国、联合国、欧盟、美国或者其他主体制裁/限制的实体或者个人或者被其使用；
 - C. 以 EAR 或者其他适用的出口管制或经济制裁法律法规所禁止的其他方式使用。
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.

保留有关中兴通讯硬件、软件和技术的目的地，最终用户和出口、再出口以及转移（国内）的最终用途的完整记录，并且在中兴通讯的合理要求下及时提供所有此类记录。

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

遵守美国出口管制法规是中兴通讯及其国际业务运营的基本要求。

Chairman of ZTE

中兴通讯董事长



President of ZTE

中兴通讯总裁

