(Issued pursuant to Section 889 of the U.S. National Defense Authorization Act for Fiscal Year 2019)

Issued by: Seeed Technology Co., Ltd.

Address: 9F, Building G3. TCL International E City, Zhongshanyuan Road, Nanshan, Shenzhen, China

1. Purpose and Scope

This Declaration is issued by the Company pursuant to Section 889 of the John S. McCain National Defense Authorization Act for Fiscal Year 2019 (Pub. L. 115-232) ("Section 889") and its implementing regulations, and applies to all products, software, and services supplied or to be supplied by the Company to the Customer under such purchase order, contract, or statement of work (collectively, the "Deliverables"). It applies to the Deliverables irrespective of product model, series, version, or configuration; where a specific model or series is identified in the transaction documents, this Declaration applies to that Deliverable without the need to restate it herein.

2. Legal Basis

(a) Section 889(a)(1)(A): Since August 13, 2019, U.S. executive agencies are prohibited from procuring or obtaining any equipment, system, or service that uses covered telecommunications equipment or services as a substantial or essential component of any system, or as critical technology as part of any system.

(b) Section 889(a)(1)(B): Since August 13, 2020, U.S. executive agencies are prohibited from entering into, extending, or renewing a contract with any entity that uses covered telecommunications equipment or services, regardless of whether such use occurs in the performance of work under a Federal contract.

(c) Implementing clauses: Federal Acquisition Regulation (FAR) 52.204-24 (Representation Regarding Certain Telecommunications and Video Surveillance Services or Equipment), 52.204-25 (Prohibition on Contracting for Certain Telecommunications and Video Surveillance Services or Equipment), 52.204-26 (Covered Telecommunications Equipment or Services – Representation), and FAR 4.2102.

3. Definitions

"Covered telecommunications equipment or services" means:

(a) Telecommunications equipment produced by Huawei Technologies Company or ZTE Corporation (or any subsidiary or affiliate of such entities);

(b) For the purpose of public safety, security of Government facilities, physical security surveillance of critical infrastructure, and other national security purposes, video surveillance and telecommunications equipment produced by Hytera Communications Corporation, Hangzhou Hikvision Digital Technology Company, or Dahua Technology Company (or any subsidiary or affiliate of such entities);

(c) Telecommunications or video surveillance services provided by such entities or using such equipment; or

(d) Telecommunications or video surveillance equipment or services produced or provided by an entity that the Secretary of Defense, in consultation with the Director of National Intelligence or the Director of the Federal Bureau of Investigation, reasonably believes to be an entity owned or controlled by, or otherwise connected to, the government of a covered foreign country.

4. Declarations

After conducting a reasonable inquiry, the Company hereby declares that:

(a) The Deliverables do not contain and do not use any covered telecommunications equipment or services, and no covered telecommunications equipment or services are used as a substantial or essential component of any system or as critical technology as part of any system;

(b) The Deliverables are not produced, provided, assembled, or manufactured on an OEM basis by the covered entities or any of their subsidiaries or affiliates;

(c) The Company does not use covered telecommunications equipment or services in its own operations;

(d) The Company has established supplier compliance controls, has cascaded the foregoing requirements to suppliers at all tiers, and requires corresponding compliance confirmations from its suppliers; all raw materials, components, and software used in the Deliverables are sourced from qualified suppliers that have been screened and confirmed compliant;

(e) The Company has checked the System for Award Management (SAM) list of excluded parties, and neither the Company nor the supply chain parties involved in the Deliverables are included therein.

5. Continuing Obligations

(a) If the Company identifies any use of covered telecommunications equipment or services during performance of the contract, it will promptly notify the customer in writing in accordance with FAR 52.204-25(d) and complete remediation or replacement within a reasonable period;

(b) The Company will update this Declaration upon any material change in applicable laws and regulations, the composition of the Deliverables, or the supply chain;

(c) This Declaration takes effect on the date of signature and remains valid until the earliest of: (i) the expiry date, if any, stated in the applicable purchase order, contract, or statement of work; (ii) the date on which the Company issues a revised Declaration that supersedes it; or (iii) the date on which the cooperation between the parties terminates.

6. Signature



Issued by (Seal): Seeed Technology Co., Ltd.

Authorized Signature: Yalei Chen

Title: Manager of Quality Control Department

Date: 2026/11/18