

11 JULY 2023

NON - RETALIATION

ECARX GROUP POLICY

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1. Introduction

1.1 Purpose

ECARX's is committed to the highest business and ethical standards as set forth in our Code of Conduct. We are focused on promoting a culture of open and honest feedback and encourage everyone to speak up with concerns related to suspected or actual misconduct and violation of our policies.

This Non-Retaliation Policy establishes that any retaliation against those who speak up, is prohibited. It also explains how the ECARX addresses allegations of retaliation and how it protects those who raise allegations.

Speaking Up is essential to enabling ECARX to adhere to the business and ethical standards in our Code of Conduct and wider company policies. Those who raise concerns, in good faith, related to suspected or actual misconduct should feel confident in doing so without recrimination. This policy also reflects the Company's commitment to respect the human rights of employees and third-party stakeholders to be free from retaliation for speaking up, as established in **the Code of Conduct** and the **Human Rights & Anti-Slavery Commitment Statement**.

1.2 Scope & Applicability

1.2.1 Scope

The scope of this document is global. It applies to employees of all ECARX Group companies and to all third-party stakeholders we engage.

1.2.2 Applicability

This document is applicable to all employees, contractors and all individuals engaged as part of the company's contingent workforce, including, but not limited to, interns, temporary personnel, consultants or independent contractors.

1.3 Roles & Responsibilities

Roles	Responsibilities
All Employees	Required to adhere to this Policy and raise suspected misconduct issues including, but not limited to, retaliation pursuant to the obligation to report per the Code of Conduct
All Managers	All Managers are responsible for ensuring adherence to this policy. In particular, as key leaders in ECARX they are expected to receive SpeakUp reports when an individual choses to report to them and either: <ul style="list-style-type: none">Follow the Speak Up Policy to ensure resolution of the report; orlog the concern in the ECARX SpeakUp Channel

2. Policy

2.1 What is Retaliation?

Retaliation is any form of retribution, penalty and/or abuse given out to an employee for

- raising a good faith concern of suspected or actual misconduct through any channel; or
- their cooperation in an investigation of misconduct.

Retaliation may take place against various people depending on the context, not only against employees accessing or interacting with the ECARXs SpeakUp mechanism, but also against other persons, such as the reporter's family members, friends, or colleagues.

Examples of retaliation include (but are not limited to):

- **Physical:** all forms of harassment including sexual harassment; physical abuse or violence; and surveillance.
- **Psychological:** Verbal intimidation or threats; inappropriate, discriminatory or disparaging comments; and bullying.
- **Economic:** Demotion; less favourable assignments than the employee would have otherwise received; lower performance ratings; disciplinary action; termination; salary reduction; preventing promotion; and job reassignment.

2.2 ECARX Prohibition against Retaliation

ECARX prohibits any form of retaliation against an employee who raises in good faith a concern about suspected or actual misconduct through any channel, or who cooperates in an investigation of misconduct.

The Company also expects business partners to prohibit any form of retaliation as set out in Section 1.2.

2.3 Reporting incidences of Retaliation

If an employee believes that he or she has been subject to retaliation for participating in the SpeakUp process, or has witnessed or is aware of retaliation against another employee, it must be reported through the ECARX Speak Up line, via phone, online or App if available, OR to any of the following people:

- Your Line Manager (Or another manager)
- Any member of the People Team
- The Country President
- The Country Head of HR
- Any member of the Legal Function
- Any member of the Compliance Function

Reports of alleged retaliation can be made anonymously – unless prohibited by law in specific jurisdictions - however anonymity may limit the ability to investigate a claim fully and thoroughly.

If an incident is reported anonymously, the Company encourages the reporter to provide sufficient information so that the matter can be investigated.

2.4 How we Manage Reports of Retaliation

Reports of alleged retaliation are received by an independent provider of the ECARX SpeakUp Channel with the support of internal investigative functions as appropriate (Audit, Security, HR, Legal and / or Compliance). This team is referred to as the SpeakUp Team.

Reports of alleged retaliation are assessed and investigated using the process set out in the **ECARX SpeakUp Policy** and the internal ECARX Case Management & Investigations Protocol.

The Reports of alleged retaliation are then managed by the Legal & Compliance Team with the support of HR and where appropriate external Counsel and investigations support.

2.5 Confidentiality of reporters and associates

The SpeakUp Team and supporting investigative functions will handle every report of alleged retaliation confidentially and in compliance with the principles set forth by the **ECARX Global Data Privacy Policy**.

As a general principle, as few employees as possible will be informed of specific reports of alleged retaliation. If employees need to be informed of reports of alleged retaliation, this will be done on a need-to-know basis in order to investigate and resolve the allegations in an appropriate and thorough manner.

However, confidentiality cannot be ensured where ECARX is required by law to disclose an allegation of retaliation to an authority such as a government agency, or where disclosure is necessary in order to investigate and/or remediate a complaint.

The aggregated number of reports of alleged retaliation received, substantiated and/or resolved will be included in the quarterly summary of all SpeakUp cases reported to the Global Compliance Committee.

ECARX may choose to publicly disclose the aggregated number of reports of alleged retaliation received, substantiated and/or resolved.

2.6 Immunity from punishment by ECARX for raising a good faith concern

Any individual who raises in good faith a concern of suspected or actual misconduct, including retaliation, will not be subject by any ECARX Group Company to negative consequences as punishment for having raised the concern.

This includes adverse employment actions, civil, criminal, or administrative actions by any ECARX Group Company, regardless of whether the matter is substantiated.

In cases where an issue has become external and is under the jurisdiction of a public authority or court, ECARX cannot protect any individual from any investigation, prosecution, claim and/or sentencing. However, where the individual has reported the concern in good faith according to section 2.3, the company will however undertake best efforts to inform the authority about the circumstances.

This protection by ECARX applies indefinitely, including where an individual employee may leave their employment with ECARX and return in the same or a different role at a later date. This protection does not apply where allegations of misconduct are raised in bad faith, or where it is established that an allegation was raised with the malicious intent to harass or harm another employee or individual. Nor does this provision mean that an individual employee will be shielded from legitimate adverse employment action unrelated to the individual's complaint.

2.7 Remedial actions

Appropriate sanctions and/or remedial actions will be implemented for substantiated instances of retaliation, up to and including termination of employment, in accordance with local labour laws.

As with all concerns raised, ECARX will respond to each incident on a case-by-case basis and seek tailored solutions for each specific instance.

Where an employee raises an issue that involves his or her own misconduct, wholly or in part, and that misconduct is determined to have occurred, the act of voluntarily coming forward and self-reporting will be considered by ECARX when determining appropriate sanctions and/or remedial actions including any legal or disciplinary action.

The Internal Review Committee is responsible for making recommendations on remedial actions in response to substantiated allegations of retaliation in accordance with the Internal Review Committee Guidance.

3. Internal Controls

Internal controls for this document are stored in the ECARX Internal Control Register

4. Breach of this Policy

In alignment with our Code of Conduct, breaches of this policy can result in remedial, corrective, or disciplinary actions up to and including termination of employment. Actual or suspected incidents of misconduct should be reported to via ECARX SpeakUp.

ECARX guarantees non-retaliation and confidentiality, to the extent legally possible, for good-faith reports of such breaches.

5. Definitions

Term	Definition
Employee	Any employee of the ECARX Group or any of its affiliates
3rd Party Individual	Any individual engaged by a ECARX Group Company on a contract or any individual employee or representative of a company engaged by ECARX Group Company
Internal Review Committee	An internal, cross-functional and/or cross-divisional, committee that is constituted by Compliance to make recommendations on sanctions & remediation that should be taken in response to substantiated allegations following an investigation into a report received via the SpeakUp Channel.
Misconduct	Conduct that violates the commitments in the ECARX Group Code of Conduct and all policies related to these commitments; or Conduct that is illegal.
ECARX or the ECARX Group, ECARX Group Company	ECARX Company, the ECARX Group and any company that is a subsidiary or affiliate of an ECARX Company. This includes companies in which ECARX is part of a Joint-Venture (JV)
Reporter	An Individual – employee or 3 rd party individual – who raises a concern of suspected or actual misconduct, including on behalf of another individual.
Retaliation	Any punishment in any form – physical, psychological or economic - of an individual: - <ul style="list-style-type: none"> - For raising a good faith concern of suspected or actual misconduct through any channel; or - For the cooperation in an investigation of misconduct
ECARX SpeakUp	The global channel – via phone, web or app - provided by ECARX for the reporting concerns of suspected or actual misconduct. AND Reported concerns of suspected or actual misconduct raised by an individual and communicated to any of the following: <ul style="list-style-type: none"> • Your Line Manager (Or another manager) • Any member of the People Team • The Country President • The Country Head of HR • Any member of the Legal Function • Any member of the Compliance Function (Reference Section 2.3)
Reports of suspected or actual misconduct raised through the ECARX SpeakUp	Reports raised through any channel as defined above for ECARX SpeakUp
Speak Up Team	The Group of Individuals with responsibility for receiving SpeakUp reports. This includes the individual provider of the ECARX SpeakUp Channel, Legal and Compliance and other appointed functions/external support as necessary

6. Exceptions to this Policy

Exceptions to this Policy are not permitted.

7. Adaptations to this Policy

Adaptations to this Policy are not permitted.

8. Policy Review

This Policy will be reviewed at least once every two years in accordance with revisions to the Code of Conduct or earlier where legislative or regulatory changes require a review.

9. Related and Referenced Documents

Document
ECARX Code of Conduct
ECARX Human Rights and Anti-Slavery Commitment Statement
ECARX SpeakUp Policy
ECARX Global Data Privacy Policy

10. Document Owner

This document is owned by Compliance.

11. Document History

Version	Approved Date	Effective Date	Change	Next Revision date
1.0	11 July 2023	30 September 2023	None – First Issue	11 July 2025