

11 JULY 2023

CODE OF CONDUCT

ECARX GROUP POLICY

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1. Message from Our CEO

Dear Colleague,

ECARX Group was established 2017 by myself and Eric Li, both keen automotive entrepreneurs.

We are a leading automotive technology company offering advanced, open, intelligent, connected operating platforms that empower automotive companies to create better and safer mobility experience. It is our mission to become the best!

To enable our success on an international scale and ensure that we are a sustainable business we need to operate in accordance with the highest ethical standards and abide by all relevant local and international laws.



The ECARX Group Code of Conduct (the 'Code') sets out the ethical standards and principles that we use to guide our business practices, govern our behaviours and explain to all our employees the conduct and behaviours we expect. It also provides our employees with principles and guidance to determine what to do when faced with difficult ethical situations or complex laws, regulations and practices that apply to their work and our business.

We also expect our suppliers and business partners when working with or on behalf of us, to abide by the principles, spirit and intention of our Code of Conduct. More details on how we expect them to do this is contained in our **Supplier Code of Conduct**.

Please use the ECARX Code of Conduct to guide your behaviours and actions in all the work you do for and on behalf of the company.

Each one of us is responsible for our actions and the consequences of our actions.

We must make sure that both our business and ethical responsibilities are taken very seriously. No unethical or illegal acts can be justified by saying that they benefited ECARX Group or that they were directed by a higher individual or authority in our company.

We request all employees

- Read the Code, discuss with your manager and in your team on how the Code applies to your business.
- Ask for further guidance or support if needed.
- Speak Up in situations you experience where you feel that something is not correct.

Details and guidelines on how you can SpeakUp in situations where your feel that behaviours and actions carried out by colleagues and/or our business do not follow the spirit of this Code of Conduct , can be found in the ECARX Speak Up Policy.

It is our joint behaviours and actions that define us, as ECARX , and the way others sees us. Myself and the ECARX Executive Leadership Team are fully committed to acting in accordance with this Code, and to developing our strong record of ethical conduct

We ask and rely on you to do the same.

Ziyu Shen
Chairman & Chief Executive Officer

2. Introduction

2.1 Purpose

ECARX is committed to sustainable and ethical business.

We comply with all applicable laws and regulations in all the countries in which we operate. Beyond compliance with applicable laws and regulations, we are committed to ethical conduct.

The purpose of our Code of Conduct is to share our values and provide the framework for our business conduct, decision making and behaviours as individuals which ensure our ethical conduct. Our actions should clearly reflect our commitment to doing the right thing. Adherence to the Code will ensure that we conduct business in an ethical and compliant way.

The Code provides information on key areas of our business activities and outlines our individual responsibilities. It is critical that we familiarize ourselves with the Code and apply it to everything we do.

To the extent this Code requires a higher standard than required by commercial practice or applicable laws, rules or regulations, as individuals and as a company, we adhere to these higher standards of our Code. If any local, national, or international laws, regulations or rules set a higher standard, they shall be complied with. In the case of conflict between the Code and mandatory local laws or regulations the latter shall prevail.

Breaching the Code or any supporting ECARX Group policies can have serious consequences for our Company and for each of us as individuals. Those who fail to follow the Code put themselves, their colleagues, and ECARX Group at risk. This is taken very seriously and may result in disciplinary action up to and including dismissal.

2.2 Scope & Applicability

The scope of this document is global. It applies to all employees and directors of ECARX Holdings, its subsidiaries and joint ventures which it controls. All are required to comply with the Code.

In addition we request that our suppliers, consultants, subcontractors, temporary workers, contractors, contingent workers and individual representatives of other third parties we work with apply the principles of the Code or work to their own similar standards. Further details of our expectations of third parties we engage are included in our **Supplier Code of Conduct**.

2.3 Your Responsibilities & Obligation to Take Action

All employees have a responsibility to protect the reputation and integrity of ECARX . All employees are expected to :-

Follow this Policy – Comply with both the letter and spirit of the ECARX Code of Conduct as well as all applicable legal requirements.

Speak Up – If you see or hear of any violation of ECARX’s Code of Conduct, you must notify your manager, HR/People Team, Legal, Compliance and/or report it through ECARX SpeakUp.

Use good judgement and ask questions – Apply ECARX’s principles in this Code of Conduct and review our policies and legal requirements. When in doubt about how to proceed discuss it with your Manager, People Business Partner, Legal or Compliance.

Additional information on expectations, responsibilities and obligations are summarised below.

Responsibilities	
All Employees	<p>All employees are expected to:</p> <ul style="list-style-type: none"> • Always act in the best interests of ECARX. • Adhere to the highest standards of ethical business conduct. • Know and comply with this Code, the law and other ECARX policies. • Complete all required training. • Maintain an open work environment that encourages trust, collaboration, and honest communication. • Seek advice and guidance when unsure of the correct action to take. • Report suspected violations of this Code, any ECARX Policy or the law.
All Managers	<p>Managers in all ECARX companies have an added responsibility in terms of business integrity.</p> <p>Managers are expected to:</p> <ul style="list-style-type: none"> • Be role models, set an example and display good ethical behaviour and business conduct. • Make sure all team members have access to and understand the Code. • Make sure your team members complete training and sign that they have fully understood the Code. • Create an environment in which members of your team feel confident and able to raise concerns. • Make sure that any concerns that are raised are taken seriously.
Suppliers and Business Partners	<p>ECARX expects its business partners to abide by the same principles as those set out in this Code, in addition to the ECARX Supplier Code of Conduct and to the laws and regulations in the places where they operate.</p> <p>ECARX also expects all Business partners to ensure that those principles are communicated to, and complied with, by their employees and subcontractors.</p>

2.4 SpeakUp

ECARX encourage employees to express their views and opinions, and to point out unacceptable behaviour and actions. Your first point of contact should be your line manager, your HR Business Partner or Local Compliance representative but if for any reason you do not feel comfortable raising an issue with these individuals, you should raise the concern via the ECARX SpeakUp Channel.

It is an obligation for each of us to report actual or suspected incidents of misconduct as stated in the **ECARX SpeakUp Policy**. ECARX guarantees non-retaliation and confidentiality, to the extent legally possible, for good faith reports of such breaches and to any employee who assists or provides information during an investigation.

The SpeakUp Office and supporting teams will handle every matter in compliance with the principles set forth by the **ECARX SpeakUp Policy** and **ECARX Global Data Privacy Policy**.

2.5 Non-Retaliation

ECARX is committed to protecting individuals who make a report or participate in an investigation in good faith. However, reports that are found to be malicious or frivolous may lead to disciplinary action.

Retaliation against any employee who raises a concern in good faith will result in disciplinary action, up to and including dismissal of the retaliating employee.

3. People & Culture

3.1 Our Values

At ECARX we are focused on creating a smarter future in motion and mobility. Our mission is to be at the centre of the next generation of vehicles. This mission requires us to boldly FACE the future together.

We have four fundamental values which we believe will enable us to achieve our mission and leave a lasting impact on the world.

- **Foresight** – We imagine the future
- **Agility** – We respond and adapt at speed
- **Collaboration** – We work together as open partners
- **Energy** – We push forward continually

3.2 Employee Conduct

We actively seek to build a diverse workforce and are committed to creating an inclusive culture where all employees can thrive.

We expect that employees will treat others with respect and dignity. All people decisions must be made based on candidate qualifications or business rationale, not bias, personal preferences or protected characteristics. Bullying, harassment, or unlawful discrimination will not be tolerated and will lead to punishment, including termination.

If you see behaviour that is not in keeping with our values or could be considered bullying, harassment, or unlawful discrimination, please report it.

3.3 Health & Safety

We understand our duty of care to our employees, contractors, suppliers and customers. We are committed to a vision of zero harm and seek to create a safe work environment, both physical and psychological, for all.

ECARX will comply with applicable laws regarding organisational health and safety. We expect our employees to behave in a way that promotes a positive safety culture and challenge any unsafe behaviour. Accidents and incidents must be reported promptly according to the process at each local site. Employees should ensure they know what to do if an emergency occurs at their place of work.

3.4 Drugs & Alcohol

ECARX prohibits the consumption, distribution and possession of illegal drugs and other controlled substances from any ECARX premises and prohibits employees from working while being under the influence of such substances.

It is also forbidden to consume alcohol on ECARX premises, except during ECARX sponsored events, office gatherings and parties or business trips when consumption should be responsible. Non-alcoholic options should be readily available at all company events, gatherings, and dinners. No one should feel pressured to drink alcohol.

3.5 Fair Employment Practices

ECARX is committed to providing fair working terms and conditions at the core of all our employment relationships. We provide a written contract to all employees, in language that can easily be understood, specifying an individual's terms of employment and we pay a remuneration package that is consistent with legal and industry standards in the countries in which we operate, including relevant collective labour agreements on working hours.

We regularly review the performance of our people and provide constructive feedback. And we commit to assess performance in a fair and consistent manner with appropriate frequency.

3.6 Privacy & Protection of Personal Information

We understand that employee data, personal data, customer data and the systems that process such data must be protected and handled transparently.

We will use personal information that we are entrusted with in a responsible way.

To enable us to do this we ask that all employees:

- Adhere to our Data Privacy principles stated in the **ECARX Global Data Privacy Policy** and supporting local legal data privacy requirements;
- Follow global privacy laws and honour business partner and customers' choices to keep their data secure and confidential; and
- Ensure that all our external service providers and business partners also commit to these principles.

3.7 Human Rights & Anti-Slavery

ECARX wants to create a business and business ecosystem that respects the rights and dignity of all people. We will strive to prevent, mitigate and remedy adverse human rights impacts throughout our workplace, business operations and in the communities in which we work

We believe that every human life has equal value and should be treated with dignity and respect and we want to protect people from abuse by those who are more powerful.

We also respect internationally recognized human rights in accordance with the United Nations Guiding Principles on Business and Human Rights - the global standard on business and human rights – and we recognise and respect our employees right to freedom of association.

Human Rights include the right to be treated equally, to life and physical security, to freedom of thought and expression, to decent working conditions, to freedom from slavery and to privacy.

For more information, see the **ECARX Human Rights & Anti-Slavery Commitment**.

4. Business Conduct

4.1 Anti-Bribery & Corruption

OUR ACTION

At ECARX we do not tolerate any form of bribery or corruption.

We will not give, offer or promise to give anything of value or accept, request or agree to receive anything of value from anyone, for the purpose of improperly influencing any commercial decisions or securing any improper advantage for the Company. We also will not use third parties to commit acts of bribery or corruption.

OUR PRINCIPLES

- Our brand and business are based on trust, transparency, and honesty.
- We do not make facilitation payments (sometimes known as “grease payments”) or permit others to make them on our behalf. (Facilitation payments are small payments to secure or speed up legal government actions eg obtaining visas, permits, licenses, etc).
- We disclose conflicts of interest in situations.
- We seek to work only with business partners who share our principles

OUR EXPECTATIONS OF YOU

- Understand and adopt ECARX’s zero tolerance position to bribery and corruption.
- Do not offer, give, or accept anything of value that can be viewed as, or has the effect of, improperly influencing a business decision, including gifts and hospitality.
- Never directly or indirectly through third parties pay bribes or accept a bribe.
- Be aware of the increased risk when dealing with government officials and so take extra caution when dealing with public officials or government agencies.
- Never make facilitation payments or allow others to make them on our behalf.

4.2 Gifts, Entertainment & Hospitality

OUR ACTION: We ensure that our participation in or use of gifts, entertainment and hospitality does not create conflicts of interest or contravene our commitment to no tolerance of bribery.

OUR PRINCIPLES

- Any gifts or business courtesies we engage in must be within corporate or local country policy limits for Gifts , Entertainment and Hospitality

OUR EXPECTATIONS OF YOU

Review and abide by the rules in the Global Anti-Bribery Policy, your local Anti-Bribery policy and your local gifts, hospitality and entertainment policy. Ask your manager if you have any questions.

4.3 Conflicts of Interest

OUR ACTIONS

We make sure that our business judgement is not inappropriately influenced by personal interests. We proactively avoid all conflict of interest- actual, potential and perceived – to maintain our integrity and reputation.

A conflict of interest occurs when an employee’s private interest interferes, or appears to interfere, in any way with the interests of the Company as a whole. Details of different types on Conflicts of Interest all employees should avoid are outlined in the **ECARX Global Conflicts of interest Policy**.

OUR PRINCIPLES

It is important that we maintain the trust and confidence of our customers, stakeholders and the markets – proactively and effectively identifying, avoiding and managing conflicts of interest is key to this principle.

OUR EXPECTATIONS OF YOU

- Review and abide by our Global Conflicts of Interest Policy and your local policy.
- Understand the different categories and types of Conflicts of interest.
- Proactively identify conflicts of interest and speak up about them.
- Report any actual, potential or perceived conflicts of interest you have as an employee to your manager and/or in accordance with the Conflicts of Interest Declaration Process.

4.4 Business Partners , Third Parties & Related Parties

OUR ACTION

We will only work with Business partners who share our values and principles, both in terms of quality of the product or service they provide and the methods they use. This is important because we can be held responsible for the actions of third parties representing or acting on behalf of ECARX.

OUR PRINCIPLES

- All Business partners must be selected with care and appropriate levels of due diligence undertaken before appointment to ensure they do not impact on our reputation by engaging in illegal or unethical behaviour, such as the use of bribes or facilitation payments, unsafe practices, or the poor treatment of workers.
- We avoid using agents or middlemen, especially when dealing with government officials. In those limited instances where the use of an agent cannot be avoided, we always ensure that the integrity of the agent is carefully investigated, and that the agent is approved and managed in line with our internal rules.
- We must also ensure that our business partners are informed of, and comply with, our ethical standards, regarding anti-corruption practices.

OUR EXPECTATIONS OF YOU

- When using third parties, you must ensure that they conduct business with the same level of integrity and honesty as ECARX.
- Always make sure you conduct appropriate levels of due diligence on third parties before engagement – in accordance with the requirements of the **ECARX Global Third Party Risk Management Policy**.
- Always make business decisions in the best interests of the ECARX Group.

4.5 Interactions with Government Officials

OUR ACTION : To interact with all government officials in a transparent, ethical and legal manner which does not contravene any anti-bribery or anti-corruption laws.

A government official can be a national or local government employee, a political candidate, a party official, a member of a royal family, or an employee of a government-controlled entity and of any state-owned enterprise.

OUR PRINCIPLE:

We will not engage in any possible situations of actual, potential or perceived conflicts of interest nor contravene our commitment to no tolerance of bribery.

OUR EXPECTATIONS OF YOU :

If you interact with government officials on ECARX's behalf, be particularly careful about gifts, meals, and entertainment. Refer to your local Gifts & Entertainment Policy and contact Legal or Compliance for approval.

4.6 Sales Practices & Fair Dealing

OUR ACTION: ECARX is committed to being honest and truthful with all of its customers, vendors, and other business partners.

OUR PRINCIPLES:

- We communicate truthful and accurate statements.
- We will avoid rude and offensive language and do not attempt to influence the outcome with deceptive practices.

OUR EXPECTATIONS OF YOU

- Never misrepresent or exaggerate (over-sell) the quality, features, or availability of the company's products, and never do anything illegal or lacking integrity to win business.
- Do not lie or pretend to be someone you are not in order to achieve a commercial gain for the company – It could be illegal
- If you receive another company's confidential or proprietary information by mistake, return or destroy it.
- Reach out to the Legal Department for questions.

4.7 Intellectual Property

OUR ACTION : ECARX's competitive position worldwide is largely dependent on our ability to create innovative products. To safeguard this competitive advantage we must take appropriate steps to protect our intellectual property.

OUR PRINCIPLES

- We protect our strategic technology and business innovations by obtaining patent, trademark, design, and other intellectual property protection.

- We use ECARX’s intellectual property correctly and in a way that protects ECARX’s reputation, brand, and position.
- We take precautions to properly maintain ECARX trade secrets.
- We take appropriate action against those who misuse our intellectual property rights. Similarly, we are committed to respecting third parties’ intellectual property.
- We do not use a third party’s intellectual property without first getting their written permission.
- We strictly comply with the terms and licenses governing the intellectual property of a third party. We maintain the confidentiality of business partners’ trade secrets in our possession.

OUR EXPECTATIONS OF YOU

- Use our patents, trademarks and know-how responsibly, as instructed and in accordance with our principles.
- Only use third party intellectual property with explicit permission or licenses.
- Report any suspicions or concerns about misuse of our intellectual property.

4.8 Anti-Trust & Fair Competition

OUR ACTION

We commit to engage in fair competition and compete on the merits of our products. We will not engage in agreements or conduct that unlawfully prevent or restrict competition.

A few common—and illegal—examples may include:

- Price fixing, where competitors or partners agree to charge a certain price for certain products or services
- Bid rigging, where competitors agree among themselves to bid in a way that allows a certain bidder to win
- Dividing or allocating markets, where competitors agree to limit their sales presence so that each company can be the only available choice for buyers in a given market
- Boycotting, where competitors agree to avoid a particular customer or supplier
- Agreements among companies not to hire their respective employees

OUR PRINCIPLES

We are proud to compete on the merits of our products alone.

OUR EXPECTATIONS OF YOU

- If any of these topics come up while you are talking with a competitor, stop the conversation immediately and report it to legal.

4.9 Customs & Trade Compliance

OUR ACTION :

- We comply with customs regulations, export controls, and trade sanctions laws.
- We ensure that we do not engage with persons or companies that have been placed by governments on sanctioned party lists.
- We will comply with regulations and laws that govern the distribution and use of our products in markets in which we choose to operate.

OUR PRINCIPLES

To be successful, our business requires the trust of governments, regulators, businesses and customers in varied country markets engaged in international trade and exchange. To build this trust, it is important that we respect the ecosystem that has developed to establish the necessary boundaries and trust.

OUR EXPECTATIONS OF YOU

- You are responsible for knowing and following the appropriate rules and procedures for imports and exports.
- If you are involved in international transactions, it is important to know what is expected of the company, including any requirements related to taxes, verification, licensing, and permits.
- For additional information on handling imports and exports, see the **ECARX Global Trade & Sanctions Policy** and consult with Legal & Compliance

4.10 Business Continuity & Crisis Management

We are committed to ensure supply of key products and services to our customers. We will take all reasonable precautions to protect customers, employees, assets and the business from a disruptive incident.

Our business customers rely on the continuous supply of our products.

5. Commercial Integrity

5.1 Accurate Books & Records

ECARX's books, records, accounts, and financial statements must be maintained in appropriate detail so that they properly reflect the company's business activities. Doing so is required both by law and by the company's system of internal controls.

The company's public financial reports must contain full, fair, accurate, timely, and understandable disclosures, which help ensure investors have access to accurate information about the company and is required by law.

The company's financial, accounting, and legal groups are responsible for procedures designed to assure proper internal and disclosure controls, and everyone must cooperate with these procedures.

You must record all information, for example tracking expenses (including your expense reports), or sales contracts.

Company records, including disclosures and filings, must be accurate, complete, and timely, so that ECARX fulfils its obligations to external stakeholders, including its stockholders.

For additional information on your specific responsibilities in ensuring the integrity of the company's books, records, accounts, and financial statements, please consult with Finance.

5.2 Document management and retention

When deciding what documents to save, archive, or trash, always check your local Records Management Policy, and Records Retention Schedule for details about how long various documents should be retained. This policy applies to all kinds of documents, both paper and electronic.

5.3 Insider Trading

Trading securities, or telling others to trade securities, while in possession of material information that is not known to the public is strictly prohibited “insider trading,” whether it is information about ECARX or another company. Trading while in possession of material inside information is illegal.

Information is material if a reasonable investor would consider it important in deciding whether to buy, hold, or sell a company’s securities.

Information that is material and is not available to the public is called inside information.

Common examples of inside information include key changes in management, mergers and acquisitions, other major business plans, and financial results that have not been released outside ECARX. Trading while in possession of inside information is illegal.

You cannot give inside information to anyone else, either. This is known as tipping and is also illegal.

Consequences for violations are severe, including jail time.

6. Protection of ECARX Assets

The assets of ECARX globally are intended to help us perform our work in the best possible way. Misuse of these assets can negatively impact the operational and financial performance of ECARX.

OUR ACTION

Theft and fraud are never tolerated at ECARX.

OUR PRINCIPLES

- We protect ECARX’s assets from damage, loss and criminal acts as they are vital to our business.
- We comply with internal controls designed to safeguard and protect our assets.
- We never use ECARX assets for personal gain or for illegal activities.

OUR EXPECTATIONS OF YOU

- You must treat ECARX’s assets with care and not misuse them.
- Use ECARX’s assets only for legitimate business purposes. You can occasionally and within limits use them for private, non-commercial purposes if it does not compromise ECARXs interest, is not excessive, and does not negatively affect your or others’ job performance.
- Protect ECARX’s assets from loss, theft, fraud, damage, and improper use by always following all relevant security procedures.
- Never use ECARX’s assets for illegal or non-ethical purposes.
- Report concerns of fraudulent behaviour, theft, or other irregular activity

In addition, our principles relating to Intellectual Property are as stated in Section 4.7

7. Political Contributions

To ensure the independence ECARX requires to vision the future of smart mobility, ECARX does not allow political contributions (directly or through trade associations) by any employee on behalf of the Company.

Prohibited political contributions include any contributions of the Company’s funds or other assets for political purposes, encouraging individual employees to make any such contribution and reimbursing an employee for any political contribution.

8. Implementation of this Code of Conduct

This ECARX Code of Conduct was approved by the ECARX Executive Leadership Team on 11 July 2023

It is to be implemented by all ECARX companies and affiliates with an effective date of **October 30, 2023**. It is applicable to all operations and associates of the ECARX Group..

9. Exceptions to this Policy

Exceptions to our Code of Conduct are not permitted.

10. Breach of this Policy

Breaches of or Code of Conduct 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.

11. Help & Advice

For Help and Advice in relation to this policy please contact ECARX Compliance - Compliance.Global@ecarxgroup.com

12. Internal Controls

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

13. Related ECARX Group Policies

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

14. Document Owner

This document is owned by Compliance

15. Document History

Version	Approved Date	Effective Date	Change	Next Review Date
1.0	11 July 2023	30 October 2023	None – First Issue	11 July 2025