

27 August 2025

ANTI BRIBERY

ECARX GROUP POLICY

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1. Introduction

1.1 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.

Our Code of Conduct states that we do not bribe anyone anywhere. This global policy expands on that, outlining our principles and rules relating to our Anti-Bribery stance and how this must be implemented.

1.2 Scope & Applicability

- a. The scope of this document is global and applies to all directors, officers, managers and employees of ECARX
- b. This Policy addresses a variety of contexts in which bribery issues may arise.
- c. Other aspects of business ethics and corruption, including conflicts of interest and passive bribery (e.g. receipt of a bribe) and insider trading, are regulated through our Code of Conduct and other policies.
- d. This Policy contains ECARX's global standards. In some countries, more stringent applicable laws, regulations or industry codes supersede the principles set out in this Policy. Divisions and local ECARX organizations may also establish more restrictive practices.
- e. This Policy is effective as of August 27, 2025, and must be adopted by all ECARX country operations and their employees.

2. Principles and Rules

2.1 Basic Rules

Principles and Rules

Directors, officers, managers and employees must not bribe, and they must not use intermediaries such as agents, consultants, advisers or other business partners to commit acts of bribery.

ECARX does not distinguish between public officials and private persons so far as bribery is concerned – bribery is not tolerated, regardless of the status of the recipient.

Always ask yourself before offering, giving, or promising anything of value to any person if what you are considering could be viewed as having an illegitimate purpose or a deliberate attempt to influence the recipient for the purpose of ECARX's commercial gain.

If the answer is yes, you must not proceed. If you are in any doubt, consult a legal or compliance representative before proceeding.

Please note that promises, doing favours and carrying out actions for people, in a deliberate attempt to influence for the purpose of ECARX's commercial gain can be considered bribes.

Employees shall not accept any kickbacks in business-related activities, or accept high-value gifts, luxury entertainment, or other goods or services that may affect their business judgment and handling without the prior approval. ECARX country operations are required to keep a register of any gifts approved and accepted.

ECARX also does not engage Third Parties who engage in Bribery. The **ECARX Third Party Risk Management Framework** includes pre-engagement and continual screening of Third Parties for this risk and must be applied.

Definitions

Bribery means offering, giving or promising (or authorizing someone to offer, give, or promise) an improper benefit, directly or indirectly, with the intention of influencing or rewarding the behaviour of someone to obtain or retain a commercial advantage.

Bribery can take a variety of forms such as offering or giving money or anything else of value, including doing favours or carrying out specific actions to influence others behaviours or the decisions they make. In fact, even common business practices or social activities, such as the provision of gifts and hospitality, can constitute bribes in some circumstances.

Situations when any directors, officers, managers or employees of ECARX request, receive or agree to receive, or accept a financial benefit or anything else of value are regulated by the Conflicts of Interest Policy.

References

ECARX Conflicts of Interest Policy
ECARX Third Party Risk Management Policy

2.2 Gifts, Hospitality and Entertainment

Principles and Rules

Gifts, hospitality, and entertainment must be modest, reasonable and infrequent so far as any individual recipient is concerned.

Any gifts, hospitality or entertainment given by ECARX to a Third party or Third party individual must be in strict accordance with the limits stated in local country policies.

Gifts, hospitality, and entertainment must never be promised, offered, or provided with the intent of causing the recipient to do something favouring ECARX, to reward such behaviour, or to refrain from doing something disadvantaging ECARX.

Cash and gifts that are cash equivalent (e.g., shopping coupons and traditional cash gifts) must never be given.

Entertainment should not be provided to any participant in ECARX business meetings, congresses or comparable events, unless the entertainment is an appropriate and incidental part of such events.

Do not pay for any side or extended trips for Third Party representatives.

Do not pay for the entertainment, hospitality, or travel costs of anyone who accompanies an invitee to a ECARX business meeting, congress, or comparable event e.g. spouse, partner or children.

Definitions

Gifts are benefits of any kind given to someone as a sign of appreciation or friendship without expectation of receiving anything in return.

They include '**courtesy gifts**', which are small gifts given at culturally recognized occasions (e.g., weddings, funerals) or special times of the year (e.g., Christmas, New Year).

Hospitality generally includes refreshments, meals, and accommodation.

Entertainment generally includes attendance at plays, concerts, and sports events.

2.3 Rules Relating to Public Officials

Principles and Rules

ECARX does not distinguish between public officials and employees of private sector organizations so far as bribery is concerned; however, it is important to recognize that public officials are often subject to rules and restrictions that do not apply to persons who operate in the private sector.

Any relationship with public officials must be in strict compliance with the rules and regulations to which they are subject (i.e., any applicable rules or regulations in the particular country relating to public officials or that have been imposed by their employer) and any benefit conveyed to a public official must be fully transparent, properly documented, and accounted for.

Definitions

The term '**public official**' has been extensively interpreted by regulators and includes

- Any elected or appointed officer or employee of a government or government department, government agency, or of a company owned or partially owned by a government;
- Any elected or appointed officers or employees of public international organizations, such as the United Nations;
- Any person acting in an official capacity for or on behalf of a government or a government department, government agency, or of a public international organization;
- Politicians and candidates for a political office; and
- Any other person who is a public official according to applicable laws, regulations and industry codes.

2.4 Political Contributions

Principles and Rules

To ensure the independence ECARX requires to innovate 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.

Definitions

Political contributions are monetary or non-monetary (commonly referred to as "in-kind" contributions, which include uses of resources, facilities, free provision of labour etc.) to support political parties, politicians or political initiatives. This includes commercial political contributions such as interests in money, goods and other property provided by political parties, political party officials and political candidates.

2.5 Donations & Sponsorships

ECARX may at times make charitable donations or engage in business sponsorships to enhance its business purpose and further its brand.

Any such donations and sponsorships shall be subject to review and approval via the Executive Leadership Team (or Local Country Executive Team), with all necessary business and support functions included in the decision.

In addition, all Third Parties in receipt of Donations or Sponsorships by ECARX should be subject to ECARX's Third Party Risk Management Framework and required Due-Diligence and screening.

Donations and sponsorships made by ECARX must never be for the purpose of securing improper benefits, inappropriately influencing business outcomes or other bribery.

Definitions

Sponsorship describes an expense incurred by ECARX in support of a cause or event, usually for the purpose of presenting a corporate image, without an inappropriate return for the expenditure.

Donations describe a transfer of value – monetary or in-kind – by ECARX to an organisation to support it in attainment of a charitable purpose or goal.

2.6 Facilitation Payments

Principles and Rules

ECARX prohibits facilitation payments, irrespective of whether local law permits facilitation payments.

Definitions

Facilitation payments are payments to public officials to expedite the performance of duties of a non-discretionary nature. These payments are intended to influence only the timing of the public officials'

actions (e.g., payments to expedite the issuance of a visa or clearing goods through customs), but not their outcome.

2.7 Third Parties

Principles and Rules

ECARX must only engage Third Parties if all the following requirements are met:

- There is a legitimate need for the services or the goods that they provide;
- The services and goods are priced at no more than market value;
- The Third Party is suitable from a risk management perspective after assessment in a robust Due Diligence process, in all areas included in the ECARX Risk Management framework – e.g. Anti-bribery, Modern slavery, Human rights etc.; and
- There is a written contract or other written document with a similar legal effect (e.g., Purchase Order)
- Approval for the financial expenditure in relation to the Third Party is granted in accordance with the ECARX internal DOA (Delegation of Authority)

The business case for engagement of the Third Party must be documented and appropriate records of the receipt of goods or services must be maintained.

Definitions

A **Third Party** is any natural person or legal entity with whom ECARX interacts and who poses, due to the nature of their business, a particular level of bribery or other ethical and regulatory risk. ECARX employees are not considered Third Parties in this Policy.

2.8 New Business & Joint Ventures

Principles and Rules

Before entering into an agreement for new business or entering into a joint venture, ECARX must complete adequate due diligence in anti-bribery, human rights, modern slavery and all other risk areas stated in the ECARX Third Party Risk Management Policy on all third parties involved in the venture, prior to completing contracts. In addition, a remediation plan should be developed and implemented to address identified issues.

Definitions

New business means any transaction involving the takeover or acquisition of all or any part of a third party or business, or the merger of an ECARX business with another company or business.

Joint venture means any type of joint agreement or arrangement between ECARX and one or more third parties to own and operate an enterprise as a separate business for the mutual benefit of ECARX and the third party or parties.

2.9 Books & Records/Internal Controls

Principles and Rules

ECARX must prepare and maintain books and records that accurately and in reasonable detail document the source and use of ECARX revenues and assets.

'Off-the-books' accounts and false or deceptive entries in ECARX books and records are strictly prohibited. All financial transactions must be documented, regularly reviewed, and properly accounted for in the books and records of the relevant ECARX entity.

All relevant financial controls and approval procedures must be followed. Documented and approved Management Authorisation Levels (MALs) and/or Delegation of Authority limits must be in place and followed.

The retention and archive of ECARX records must be consistent with ECARX standards and tax and other applicable laws and regulations.

Definitions

Books and records include accounts, invoices, correspondence, papers, CDs, tapes, memoranda and any other document or transcribed information of any type in digital or physical format.

3. Implementation

3.1 Training

All ECARX employees must familiarize themselves with this Policy. Employees must be trained in accordance with the ECARX-wide compliance training curriculum. Local ECARX organizations may define additional training requirements for their local Anti-Bribery policies and their Third Party Risk Management as implemented.

ECARX Third Parties should also receive a copy of the ECARX Anti-Bribery Policy, and the relevant Anti-Bribery provisions should be included in their contracts.

3.2 Responsibilities

It is the responsibility of every ECARX manager to implement this Policy within their area of functional responsibility, lead by example, and provide guidance to the employees reporting to him or her.

ECARX managers must also seek to structure incentives and conduct performance assessments accordingly.

All Employees are responsible for adhering to the principles and rules set out in this Policy.

3.3 Reporting Potential Misconduct / Non-Retaliation

Any Employee with knowledge of suspected misconduct must report their suspicion promptly via the ECARX Speak Up process.

Employees who report potential misconduct in good faith or who provide information or otherwise assist in any inquiry or investigation of potential misconduct will be protected against retaliation.

3.4 Breach of this Policy

Breaches of this Policy will not be tolerated and may lead to disciplinary and other actions up to and including termination of employment.

4. Exceptions to this Policy

Exceptions to this policy are not permitted.

5. Help & Advice

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

6. Internal Controls

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

7. Related ECARX Group Policies

Document
ECARX Code of Conduct
ECARX Conflicts of Interest Policy
ECARX Third Party Risk Management Policy
ECARX SpeakUp Policy

8. Document Owner

This document is owned by ECARX Group Compliance

9. Document History

Version	Approved Date	Effective Date	Change	Next Review Date
1.0	11 July 2023	30 September 2023	None – First Issue	11 July 2025
2.0	27 August 2025	27 August 2025	None – Second Issue	27 August 2027