

GEELY



Geely Automobile Holdings Limited Code of Conduct

Approved and adopted by the Board of Directors on 25 April 2024 (The 3rd Edition)

Content

Introduction

I. Respecting the rights of employees

Working conditions, remuneration and benefits

Non-discrimination and equal opportunities

Prohibition of child labor, forced labor and human trafficking

Prohibition of workplace violence and harassment

Health and occupational safety

II. Protection of company assets

Business records and document management

Information disclosure and inside information management

Intellectual property

Data and information security

III. Upholding integrity

Anti-bribery and anti-corruption

Gifts and entertainment

Conflict of interest

Fair competition and anti-monopoly

Export and trade compliance

Anti-money laundering

Financial integrity

Personal data privacy protection

Value chain compliance

IV. Caring for community and environment

Community engagement

Environmental protection

V. Support

Training

Consultation, reporting and grievance

Remedies



Geely Automobile Holdings Limited and its subsidiaries (hereinafter referred to as the “Group” or “Geely”) always adhere to honesty, trustworthiness, and operations with compliance to nurture a corporate culture with high standards and principles in accordance with business ethics and compliance.

To promote a sound operation and sustainable development, Geely has formulated the Code of Conduct (hereinafter referred to as the “Code”) in accordance with the applicable national or regional laws and regulations where it operates, generally accepted international ethical standards, business practices of global responsible corporates, compliance management guidelines of relevant regulatory authorities in various countries, etc.

When making a business decision for Geely, every employee of Geely should ask himself/herself the following questions with the sense of being an owner of the company and listen to his/her inner voice:

1. Is the decision in compliance with laws, regulations and business practices?
Is the decision in compliance with the *Code* and the values of Geely?
2. Is the decision in the best interests of Geely and its customers, employees, investors and the community?
3. If the decision is exposed by the media, will it have a negative impact on Geely's brand image?
4. Will I really not regret the decision I have made?

If you have any doubts about any of the above questions, your decision may involve a relatively high risk and you should contact your supervisor or the compliance department.



The *Code* applies to Geely Automobile Holdings Limited and its subsidiaries. If any subsidiary needs to issue its own separate code of conduct due to regulatory requirements, its principles should be in accordance with *the Code*. All directors, senior management and employees (including full-time, part-time and temporary employees) of Geely shall act in accordance with *the Code* when conducting businesses on behalf of the Group.

Geely will review the *Code* annually and amend, when necessary, and publish it on the website of Geely Automobile Holdings Limited (www.geelyauto.com.hk).

Q: How will violation of the law or failure to comply with the *Code* affect Geely or an individual?

A: Violation of the law or failure to comply with the *Code* may cause serious consequences to Geely and its employees.

For an individual, the consequences may include:

- Internal disciplinary action;
- Legal prosecution, including compensation for damages, fines and criminal penalties.

For Geely, the consequences may include:

- Damage to Geely's corporate reputation, brand image and market value;
- Hefty fines and compensation for damages;
- Loss of business opportunities.



I. Respecting the rights of employees

Geely regards employees as its most valuable assets, always adheres to the employment principle of “Bringing respect, accomplishment and happiness to people” based on an open, equal, respectful and inclusive attitude, respects international human rights standards, including the Universal Declaration of Human Rights, United Nations Guiding Principles on Business and Human Rights and the International Labor Organization conventions, and provides employees with a broad career development platform as well as helps them to realize their self-worth.

Working conditions and remuneration and benefits

Geely undertakes that the working conditions for employees comply with all applicable laws and regulations. Geely undertakes to enter into written employment contracts with its employees in accordance with applicable laws and regulations and clearly stipulate the employment terms in an easily understandable manner.

Geely undertakes to comply with internationally accepted human rights and labor standards and provide fair salary and welfare, paid leave as well as health protection in accordance with applicable laws and regulations, local market conditions and living standards. Geely undertakes to pay wages in full and on time, showing legitimate deductions in the payslips.

Geely respects employees’ rights of freedom of association (such as trade unions) and collective bargaining in accordance with the laws and regulations of the place of operation, and protect employees from discrimination, harassment, coercion or retaliation for exercising their rights to form, join, or refuse to join trade unions and engage in collective bargaining.



Non-discrimination and equal opportunities

Geely undertakes to provide equal opportunities to all employees in terms of employment, promotion and remuneration, and prohibit any discrimination based on gender, race, color, religion, age, origin, educational background, marital status, maternity status, disability, sexual orientation, nationality, political opinion, union affiliation, social background, and any other characteristics protected by applicable laws. Geely creates a diverse work environment that respects different opinions, perspectives and beliefs by actively promoting the participation of different categories of employees and the formation of diverse teams. Geely undertakes to respect and support the rights of women, children, migrant workers, people with disabilities, indigenous people and relevant conventions, such as the Convention on the Elimination of All Forms of Discrimination Against Women and the United Nations Declaration on the Rights of Indigenous Peoples.

Prohibition of child labor, forced labor and human trafficking

Geely respects and supports children's rights, including the United Nations Convention on the Rights of the Child and the Children's Rights and Business Principles, and eliminates the employment of child labor in all businesses and firmly opposes any use of child labor, and does not cooperate with any suppliers that intentionally use child labor. Geely adopts effective procedures and methods to identify the age of workers during recruitment to ensure that workers must meet the minimum working age stipulated in the International Labor Organization's Minimum Age Convention and applicable local laws upon employment, and prevents the accidental recruitment of child labor due to workers providing false age documents, and establishes and maintains child labor relief procedures. Once child labor is discovered, immediately stop their work, terminate the employment of child labor and initiate child labor relief procedures.

Geely respects the International Labor Organization's Forced Labor Convention and the Abolition of Forced Labor Convention, and eliminates all forms of forced labor, slavery and human trafficking in all businesses, and supervises the relevant acts of partners (such as suppliers and recruitment agencies), including: prohibiting the use of misleading or deceptive methods when providing employment opportunities; not charging recruitment fees or related costs to job seekers and employees; not retaining, destroying, or concealing employees' resident ID cards or other passports; not requiring employees to provide guarantees or collecting money from employees in other names; prohibiting insult, physical punishment, beating, illegal search or detention of employees; and prohibiting the use of violence, threats or illegal restrictions on personal freedom to force labor.

Prohibition of workplace violence and harassment

Geely strictly prohibits workplace violence and harassment, including physical, psychological, sexual and other workplace violence and harassment, to promote a harmonious and inclusive work environment.

Health and occupational safety

Geely is committed to minimizing health and safety risks and impacts by continuously improving working conditions, implementing various risk prevention and health promotion measures, providing all employees with necessary safeguards which meet occupational health and safety standards and setting performance targets for health and occupational safety.

Q: If I am harassed by a supervisor at my workplace, but I am afraid of retaliation and dare not report it, what should I do?

A: The *Code* stipulates that any unit, employee, customer, business partner or other stakeholders of Geely who is aware of a violation or suspected violation can make timely inquiries or reports through the channels established by the Group. No unit or individual shall use any excuse or means to prevent or suppress any informant's reporting, nor shall they retaliate against the informant.

Therefore, you may report to the compliance officer of the related unit or to the compliance department through the email or telephone number of Geely for compliance-related reporting as set out in the *Code*. Upon receipt of your report, the compliance department will conduct an investigation in accordance with the procedures. Appropriate disciplinary action will be taken against the relevant responsible person in accordance with internal provisions and procedures upon substantiation.

Geely undertakes to maintain strict confidentiality for you and protect your legitimate rights and interests.

- More details on employee rights (including but not limited to performance appraisal, recruitment, training, secondment, employee care and assistance, health and occupational safety, production safety management, etc.) are set out in internal policies



II. Protection of company assets

The employees shall properly manage and protect the Group's assets and shall not use the Group's assets for acts that are detrimental to the interests of Geely.

Q: What are the Group's assets?

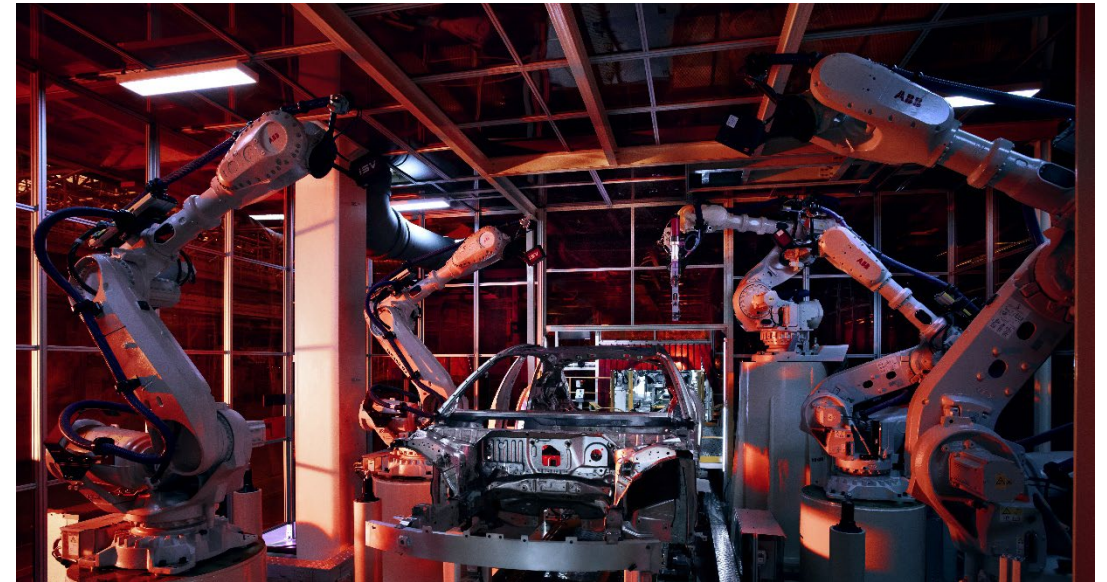
A: The Group's assets are resources that are owned or controlled by Geely and are expected to bring economic benefits to Geely, including tangible assets and intangible assets. Tangible assets include: monies, fixed assets such as buildings, equipment and tools, inventories, office equipment, other current assets or long-term assets. Intangible assets include equity, land use rights, confidential information, brand reputation, intellectual property, non-patented technology, business opportunities and information assets.

Business records and document management

Geely undertakes to record all financial and non-financial information of the Group in an honest, accurate and objective manner, so as to ensure the completeness and security of the documents. Employees who knowingly use the documents containing false information to deceive or mislead Geely may be in violation of the relevant laws, regardless of whether they have obtained any inappropriate interest.

Information disclosure and inside information management

Geely undertakes to disclose true and accurate information to the public, protect inside information and avoid inside trading. Persons with knowledge of inside information shall not use or disclose the inside information without authorization.



Q: What is inside information?

A: Inside information refers to specific information which has not yet been made public, is related to the Group's operation, finance and other aspects, and has a significant influence on the market price or trading of the company's shares, bonds and other securities. For example, potential mergers and acquisitions, expected earnings or sales data, significant changes in production plans and operations, government investigations, significant legal proceedings or reconciliation, and changes in senior management are all considered inside information before they are made public. For details, please refer to the *Guidelines on Disclosure of Inside Information* issued by the Securities and Futures Commission in Hong Kong.

Q: What are the consequences of improper use or disclosure of inside information? As an employee possessing the Group's inside information, what should I pay attention to?

A: Improper use or disclosure of inside information may constitute a serious crime, for which the perpetrator may face severe criminal penalties and economic compensation liability. Therefore, as employees possessing the Group's inside information, we should:

1. Not engage in securities trading by taking advantage of inside information or recommend the relevant securities to others;
2. Keep inside information strictly confidential and ensure that unauthorized persons do not have access to such information;
3. Not accept interviews by the news media without proper authorization.

Intellectual property

Employees shall protect the Group's intellectual property, shall not illegally obtain, use or disclose the Group's intellectual property, shall protect and strictly prohibit the Group's confidential information from disclosure, and shall actively take preventive and corrective measures against tort and breach of confidence.

Data and information security

Geely undertakes to ensure the availability, integrity and confidentiality of data and information through measures including employee management, business process control and related technical safeguards. A specialized information security management department is responsible for promoting the implementation of various data and information security management systems to ensure information security in the process of business operation and cooperation among business parties as well as the continuity of business development.

Employees shall promptly report to the information security management department or compliance department if there is any circumstance that may lead to data and information security risks.

■ More details on asset management, patent management, and data and information security management are set out in internal policies.

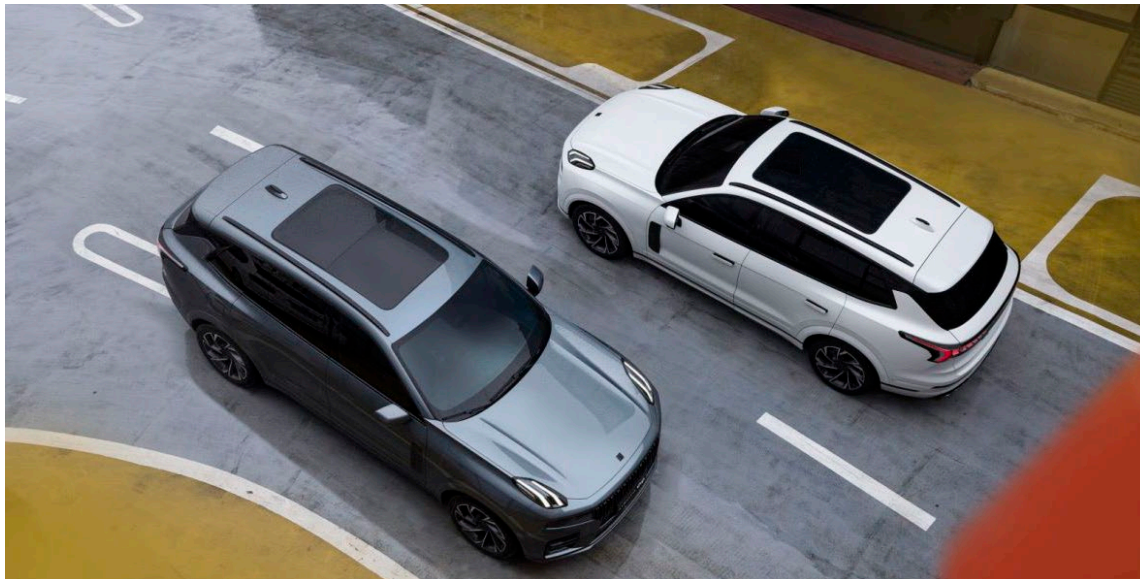


Anti-bribery and anti-corruption

Geely has zero-tolerance towards bribery and corruption. Geely always upholds the principles of integrity and honesty in its business operations, and strictly abides by the laws and regulations applicable in the places of business and high standard business ethics. The employees of Geely shall conduct business activities in a legal and compliant manner and shall not offer or accept bribes, kickbacks or other improper benefits in any form in their business dealings.

Gifts and entertainment

Geely objects to any form of business corruption or fraud, but does not restrict legitimate and ethical business courtesies. Geely requires all employees to comply with applicable anti-corruption regulations and policies and conduct business activities in a legal and compliant manner. It is strictly prohibited to offer gifts or entertainment in exchange for business or other benefits.



Q: When offering gifts and hospitality, what should we do:

- A: 1. It should have a reasonable business purpose, be in compliance with the laws and regulations and business practices of the country or region in which the business is conducted and the compliance requirements of the known recipient entity shall be complied;
2. Cannot be a way to obtain undue advantages; cannot be in the form of cash or cash equivalents;
3. Cannot create an unethical or dishonest impression; the total value and frequency of gifts or hospitality offered to the same recipient cannot be excessive or extravagant and shall always follow business practices
4. The cost of gifts and hospitality offered shall be reimbursed in accordance with the Geely expense reimbursement policy, and the authenticity of the business information and reimbursement information submitted shall be ensured.

Q: When accepting gifts and hospitality, what should we do:

- A: 1. In principle, we should avoid accepting gifts or hospitality from others; under any circumstances, we should not ask for gifts or request hospitality from others; nor should we reimburse any bills at business partners for any reason.
2. Acceptance of gifts and hospitality shall be in accordance with the laws, customs and business practices of the country or region in which the business is conducted. In principle, gifts and hospitality may only be accepted for a reasonable business purpose if they meet the following requirements:
- A. Gifts that are offered on the basis of business courtesy and are not cash or cash equivalents, such as prepaid cards, gift cards or discount coupons.
- B. Hospitality that is consistent with business practices in the context of current operations, and such hospitality must be reasonably priced and not influence the recipient's ability to make decisions based on the Company's interests.
- C. The frequency of both gifts and hospitality as described above must not be excessive.

Conflict of interest

Conflict or potential conflict between the interests of the company represented by employees in their performance of job duties, and the interests of individuals and their affiliated persons and affiliated companies, which may affect the duty of fidelity of employees to the company and result in their pursuit of personal interests to the detriment of the company's interests. All employees shall make every effort to avoid any circumstance giving rise to or likely to give rise to conflict of interest between themselves and the Group, and always uphold the interests and reputation of Geely.



Q: What are the types and requirements of conflict of interest:

A: 1. Employees are strictly prohibited from having the following conflict of interest:

- (1) I, my spouse, and children directly or indirectly hold shares or interests in competitors or business partners.
- (2) Seek business opportunities belonging to the company for yourself or others.
- (3) Serve in other organizations or provide any form of services or labor to other organizations without permission.
- (4) Have a direct or indirect reporting relationship with a related person, or hold a position with incompatible responsibilities.

2. Conflict of interest that employees need to declare include but are not limited to:

- (1) All prohibited conflict of interest situations listed above.
- (2) I directly or indirectly hold shares or interests in external companies or other entities.
- (3) Affiliated persons directly or indirectly hold shares or interests in competitors or business partners.
- (4) I, affiliated persons, and affiliated companies have any form of business dealings with Geely, or negotiate with Geely or participate in Geely's bidding business for the purpose of business dealings.
- (5) Affiliated persons hold directors, supervisors or other senior management positions in Geely's competitors or business partners.
- (6) Affiliated persons work in Geely.

Q: What should we do about conflict of interest:

- A: 1. Employees should avoid conflict of interest with the company as much as possible in the best interest of the company;
2. Employees should sign a declaration on conflict of interest and be aware of the company's regulations on conflict of interest;
3. When a conflict of interest situation occurs, employees shall promptly suspend the behavior that leads to the conflict of interest and follow the necessary declaration and approval procedures;
4. The company has the right to penalize employees who violate the conflict of interest management regulations.

Fair competition and anti-monopoly

Anti-monopoly law protects fair competition in the market, and the interests of customers, the company and the public. Any violation of anti-monopoly law may result in hefty fines and even imprisonment for the company, management and relevant individuals. Geely undertakes to conduct fair competition, abide by applicable anti-monopoly and anti-unfair competition laws and regulations, and protect fair and open competition from undue influence.



Q: What are the characteristics of monopolistic behavior?:

A: 1. Monopoly agreements;

2. Abuse of dominant market position;

3. Concentration of business operators that have or may have the effect of eliminating or restricting competition.

Q: What should we do for anti-monopoly?

A: We should (including but not limited to the following points):

1. Not agree or enter into agreements with competitors on fixing or changing prices, market division, customer or regional allocation arrangement, etc. in violation of laws;
2. Not exchange or discuss competitively sensitive information with competitors, including price terms for third parties, costs, customers' information, production or capacity data, future production expansion or capital expenditure plans, etc.;
3. Not contact or communicate with competitors in violation of laws or the Group's policies by taking advantage of trade associations;
4. Please consult the compliance department if it is uncertain whether there is an anti-monopoly risk.

III. Upholding integrity

Export and trade compliance

The export and trade control regulations of various countries stipulate the relevant requirements for the countries / regions, entities / individuals and item transfers of the company's compliance transactions. Geely complies with applicable laws, regulations and related provisions. Violation of which may seriously affect Geely's operations and reputation, incur significant financial penalties, and may also result Geely being denied access to certain markets or losing the right to import related products.

Q: When conducting international business, we should:

- A:
1. Comply with the Group's export and trade control compliance policies and applicable laws and regulations;
 2. Screen whether transaction objects involve restricted or sanctioned individuals, entities, regions or countries, and promptly consult the compliance department when risks are discovered;
 3. Consult the compliance department to learn about whether the export destination is subject to certain sanctions or restrictions;
 4. Review the export classification of hardware, software, technology or services and ensure that necessary export licenses or other authorizations are obtained in advance;
 5. Keep records of all import and export transactions in a complete and accurate manner.



Anti-money laundering

Geely undertakes to comply with the relevant laws and regulations on anti-money laundering and ensure that companies or individuals strictly comply with the required reporting requirements when conducting activities and transactions in which they may receive illegal funds or engaging in activities and transactions involving illegal funds. Geely only works with business partners whose business practices comply with legal requirements and whose sources of operating funds are legally identifiable.

To avoid receiving illegal funds or engaging in activities and transactions involving illegal funds, we need to carefully check the identity of our customers, business partners and other third parties who wish to do business with Geely.

Financial integrity

Geely ensures that all account books and financial records are complete, accurate, true and prepared on a timely basis in accordance with applicable rules and standards. Geely undertakes to comply with all applicable laws, regulations, standards and practices, and provide accurate and truthful reporting to investors, employees, customers, partners, the public and all government agencies.



Q: How should we conduct anti-money laundering reviews?

A: Anti-money laundering reviews include:

1. Conducting appropriate due diligence on the Group's business partners and on properties received by the Group (e.g. funds, goods, etc.). If the business partner is unable to provide details of its ownership or verify the current status of its ownership, the compliance department should be consulted for further verification and judgement;
2. Watching out for irregularities in payment transactions, including but not limited to the following:
 - A. payments in currencies other than those indicated in commercial invoices or contracts;
 - B. any suspicious transactions using cash or cash equivalents;
 - C. payments to or from other countries with no apparent commercial relationship;
 - D. payments by or to non-business partners;
 - E. payments by multiple cheques or bank drafts;
 - F. involvement of customers in high-risk countries or regions, etc.

Personal data privacy protection

Geely undertakes to protect the personal information of its employees, customers, suppliers and other relevant information subjects by collecting, acquiring, processing, using and storing personal information in strict accordance with the applicable legal provisions of each business location. Geely guarantees that personal information will only be collected, stored, processed or otherwise used to the extent permitted by law and in accordance with the applicable legal basis, such as the consent of relevant information subject, signing of contracts, or other legal process requirements.

In handling personal information, Geely strictly follows the fundamental principles of personal information protection, “lawfulness and legitimacy, definite purpose, minimum necessity, storage restriction, openness and transparency, security, consistency of rights and responsibilities, subject participation, etc.”. At the same time, Geely ensures the security of all information processing systems, components or activities to ensure the confidentiality, integrity and availability of such protected information and to prevent unauthorized internal and external access.



Q: How should we protect personal data privacy?

A: All Geely employees should comply with the Group's policies relating to the protection of personal information, and all units should implement the relevant requirements for the protection of personal information in their workflow and follow the core requirements below:

1. Collect personal information only in a lawful and fair manner and, where necessary, with the consent of the relevant information subject;
2. Specify the purpose for which the information is to be collected and process only personal information that is necessary to achieve that purpose;
3. Respond promptly to claims from relevant information subjects in accordance with legal provisions and the Group's policies;
4. Keep personal information only for as long as necessary, and delete or anonymize beyond the necessary period in accordance with legal provisions and the Group's policies;
5. Take appropriate technical and organizational security measures to protect personal information from loss, damage or disclosure in any form;
6. Share personal information with third parties only where there is sufficient legal basis to do so, and sign relevant written agreements to clarify the responsibilities of each party in the protection of personal information;
7. Transfer personal information to other countries or regions where it is permitted by law and where effective security of relevant information is ensured.

Value chain compliance

While strengthening its own compliance, Geely also actively drives and influences business partners, to promote compliance development in the entire value chain. Geely firmly opposes any form of commercial bribery and fraud and works with business partners with integrity.

Geely is committed to responsible procurement and integrates environmental, social and governance ("ESG") factors in supply chain management, giving priority to suppliers with better ESG performance and working together to reduce negative impacts on the environment and society. Meanwhile, Geely requires suppliers to comply with the Geely Supplier Code of Conduct and conducts regular inspections and assessments on them, and identifies and reduces relevant risks in its supply chain through due diligence. In addition, we carry out responsible mineral procurement based on the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas ("OECD Guidance"), and require suppliers to at least conduct due diligence on conflict minerals (including: tin, tantalum, tungsten and gold, commonly known as "3TG") in accordance with the OECD Guidance, so as to proactively identify and eliminate conflict minerals in our products and supply chain.



- More details on integrity (including but not limited to acceptance of gifts and hospitality, conflicts of interest, trade controls, anti-monopoly, expense reimbursement, and privacy protection, etc.) are set out in internal policies.

IV. Caring for community and environment

Geely is committed to the concept of social and environmental sustainability and attaches great importance to the relevance of corporate survival to social development and ecological environment.

Community engagement

Geely undertakes to operate in a way that commands the trust of the communities in which it operates, not only by fulfilling its obligations and responsibilities to the communities in which it operates, but also by striving to build open, genuine and harmonious relationships with the communities and social organizations, etc. in which it operates. Geely continues to give back to society by providing financial support for poverty alleviation, education and other charitable causes in the communities in which it operates.

Environmental protection

Geely undertakes to comply with laws, regulations and standards relating to environmental protection in the places where it operates. In order to reduce the environmental impact of its business, the Group is committed to: setting environmental performance targets, implementing effective environmental management systems, continuously monitoring and improving environmental performance. The Group proactively reduces pollutants, waste and carbon emissions, protects and conserves natural resources (including but not limited to forests, water and land) and energy utilization, and promotes green procurement (including giving priority to the products, services and suppliers that use environmentally friendly and low-carbon, recycled materials and renewable energy, etc.), so as to effectively adapt to and mitigate climate change, avoid damage to the ecological environment and biodiversity, and reduce the impact of products, services and value chain on the environment. The Group discloses major environmental issues on a regular basis and communicates these with stakeholders, disseminates laws and internal requirements on environmental protection to employees and the entire value chain, and provides relevant training programs.

■ More details on community care and environment are set out in internal policies.

Q: In order to maintain cooperation and coordination with the community, what policies does Geely support and advocate:

- A: 1. Maintain close liaison with local government authorities, community organizations and residents, and communicate with them in a timely manner on matters relating to the Group's operations and development, with a view to establishing mutually beneficial and win-win partnerships;
2. Strive to provide employment, training and development opportunities for the local community and actively fulfil its responsibilities as an employer;
3. Focus on promoting staff localization and diversity strategies, uphold an equal, liberal and anti-discriminatory employment policy, and respect the ethnic traditions, religious beliefs, values and privacy of local employees.



Training

In order to strengthen the compliance awareness of all employees, Geely has established and continuously operated its compliance training system with full staff coverage and clear hierarchy to provide training programs for all employees on the policies and standards of conduct contained in the Code, as well as to provide resources to guarantee the orderly implementation of compliance training, thereby ensuring the relevance and effectiveness of compliance training.

Consultation, reporting and grievance

Geely undertakes to establish a good compliance consultation, reporting and grievance mechanism, and encourages all employees, customers, business partners and other stakeholders to consult, report or file a grievance about compliance risks or non-compliance issues through appropriate channels. Geely undertakes to keep the informant and the content of the complaint strictly confidential.

If you are in doubt about your understanding or application of the *Code*, or if you believe that a breach of the *Code* has occurred, or you want to make a complaint about the adverse impact that Geely and its value chain's related actions may have or have had on you, please feel free to contact the compliance department. All reports of possible breaches of the *Code* will be responded to in accordance with the Group's relevant processes. If substantiated, Geely will take appropriate disciplinary action against the responsible personnel in accordance with its internal rules and procedures.

Contact information of the compliance department:

Tel.: +86 4000571840; Email: geelyauto.coc@geely.com

Remedies

Geely recognizes that its policies and procedures may not prevent all adverse impacts in the value chain. We are committed to providing remedies for individuals, employees or communities who may be or have been adversely affected, including through the reporting and grievance channels mentioned above. In addition, Geely commits not hinder affected parties from using other legal remediation channels or procedures. Where appropriate, Geely is committed to working with suppliers or other organizations to remedy adverse impacts directly related to the company's operations, products or services.



GEELY