

A close-up, low-angle shot of the front of a white Geely Galaxy car. The car's sleek, aerodynamic design is highlighted by sharp red light signatures along the front grille and headlights. The word "GALAXY" is visible in red lettering on the front grille. The background is a dark, gradient grey.

GEELY

**Geely Automobile Holdings Limited**

# **Code of Conduct**

Approved and adopted by the Board of Directors on 21 March 2023 (The 2<sup>nd</sup> Edition)

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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](http://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 Fundamental Conventions of the International Labor Organization, 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 and local market conditions.

Employees have rights to join and organize trade unions in accordance with local laws and regulations. Trade unions represent employees to conduct collective bargaining and sign collective.

### Prohibition of discrimination

Geely undertakes to provide equal opportunities to all employees, prohibit any discrimination based on age, race, color, gender, sexual orientation, family background, nationality, religion or disability, and foster a diversified work environment where different opinions, perspectives and beliefs are respected by actively promoting diversity among employees.

### Prohibition of child labour, forced labour and human trafficking

Geely prohibits the use of child labor, forced labor and human trafficking for its businesses.





# I. Respecting the rights of employees

## Prohibition of harassment

Geely strictly prohibits sexual harassment and other workplace 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.



## 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.



## II. Protection of company assets

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.





### III. Upholding integrity

#### 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

Conflicts or potential conflicts between the interests of the company represented by the directors or employees in their performance of job duties, and the interests of themselves or related parties, which may affect the duty of fidelity of directors and 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 is the type of conflict of interest and what are the requirements:

A: 1. Proactively reporting matters that have or may have a conflict of interest;  
2. Avoidance of self-dealing;  
3. Prohibition of holding external interests;  
4. Prohibition of participating in activities that are in competition with the company or assisting the competitor of the company to proceed (except for normal business cooperation);  
5. Prohibition of external employment that may interfere with the normal performance of the employee's job duties;  
6. Prohibition of internal employment with related parties that may influence the normal performance of the employee's job duties;  
7. Prohibition of infringement of the Company's trade secrets;  
8. Other prohibited conflict of interest matters.

Q: What should we do about conflict of interest:

A: 1. Employees should avoid conflicts 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.



### III. Upholding integrity

#### 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.

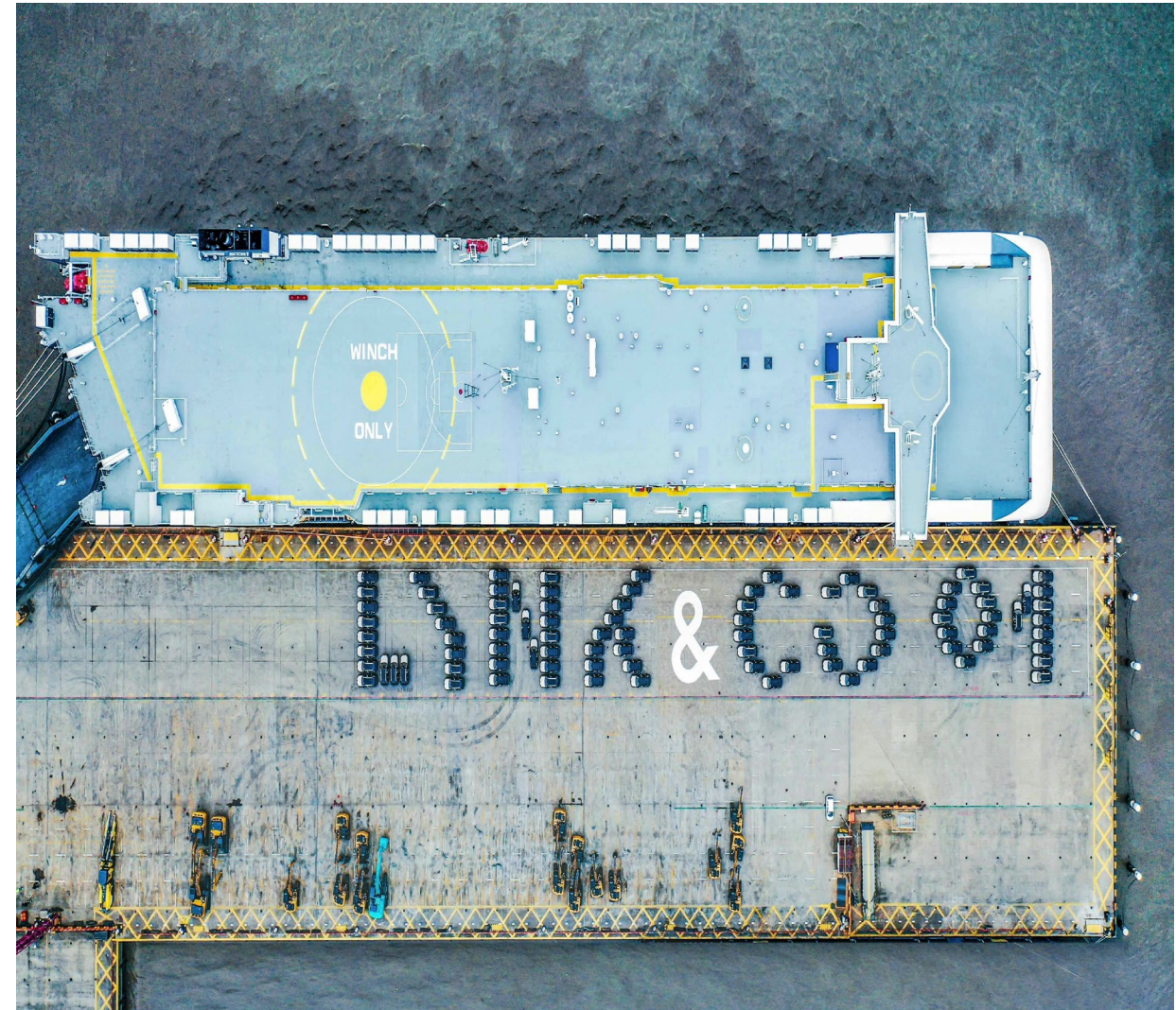
### III. Upholding integrity

#### Export controls and trade sanctions

Export controls and trade sanctions set forth the relevant requirements for countries/regions and entities/individuals in which a company conducts compliant transactions with, and 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. Abide by the Group's export controls and trade sanctions compliance policies and applicable laws and regulations;
  2. Ensure that the transaction does not involve a restricted or sanctioned individual, entity, region or country;
  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, 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 unauthorised 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 anonymise beyond the necessary period in accordance with legal provisions and the Group's policies;
5. Take appropriate technical and organisational 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. Business partners must meet Geely's compliance requirements for working environment and human rights, health and safety, business ethics, environmental protection, etc.

- 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 organisations, 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 is committed to complying 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 formulating specific environmental performance targets, implementing an effective environmental management system, continuously monitoring and improving its environmental performance, reducing emissions, pollution and waste, effectively managing climate change, efficiently using natural resources and energy, disclosing major environmental issues on a regular basis and communicating these with stakeholders, disseminating laws and internal requirements on environmental protection to employees and the entire value chain, and providing relevant training programmes.

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 organisations 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 localisation 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 programmes 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 and reporting

Geely undertakes to establish a good compliance consultation and reporting mechanism, and encourages all employees, customers, business partners and other stakeholders to consult or report 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, 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](mailto:geelyauto.coc@geely.com)





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