

奇瑞汽车股份有限公司反腐败政策

Chery Automobile Co., Ltd.

Anti-corruption Policy

作为全球化汽车企业，奇瑞汽车股份有限公司（以下简称“奇瑞”）始终将合规经营视为生命线。奇瑞遵守业务所在国家和地区关于公平竞争、反贿赂及反腐败等方面所适用的法律法规，以防止因参与任何形式的贿赂或贪污而导致可能受到的刑事和民事处罚及名声受损。为系统性预防商业贿赂与腐败风险，规范礼品往来、政治及慈善捐赠等行为，奇瑞特此制定了《奇瑞汽车股份有限公司反腐败政策》（以下简称“《政策》”），通过全员反贪腐培训、违规举报机制及惩戒体系，与合作伙伴共建阳光透明的商业环境，确保全球业务合规可持续发展。

As a global automotive enterprise, Chery Automobile Co., Ltd. (hereinafter referred to as "Chery") consistently regards compliance operation as its lifeline. Chery strictly adheres to applicable laws and regulations regarding fair competition, anti-bribery, and anti-corruption in all jurisdictions where it operates, aiming to prevent potential criminal and civil penalties as well as reputational damage that may arise from involvement in any form of bribery or corruption. To systematically prevent risks of commercial bribery and corruption, and to regulate gift exchanges, political donations, and charitable donations, Chery hereby establishes the "Anti-Corruption Policy of Chery Automobile Co., Ltd." (hereinafter referred to as the "Policy"). This framework incorporates comprehensive anti-corruption training for all employees, violation reporting mechanisms, and a disciplinary system, collaborating with partners to build a transparent and ethical business environment that ensures compliant and sustainable development of global operations.

1 适用范围

1 Scope of Application

本政策适用于奇瑞及所属的子公司。境外或公开上市的子公司可根据适用法律和上市规则制定与本政策原则基本一致的政策。

对于本公司董事及各级员工(包括所有全职、兼职及临时职员)、合资公司或商业伙伴的腐败行为，奇瑞均采取零容忍的态度，且均不能获得豁免而不受本政策规管，确保董事会和管理层顶层设计与战略决策的正确方向。

奇瑞要求其合资公司和与奇瑞有业务往来的商业伙伴制定和实施同等标准的反腐败政策。

This Policy applies to Chery and its subsidiaries. Overseas or publicly listed subsidiaries may formulate policies substantially aligned with the principles of this Policy in accordance with applicable laws and listing rules.

Chery maintains a zero-tolerance stance toward corrupt practices by directors, employees at all levels (including full-time, part-time, and temporary staff), joint ventures, or business partners. No exemptions shall be granted, and all such acts remain subject to this Policy, ensure the Board of Directors and senior management maintain correct orientation in top-level design and strategic decision-making.

Chery mandates its joint ventures and business partners to establish and implement anti-corruption policies equivalent to its own standards.

2 基本政策与指引

2 Fundamental Policies and Guidelines

本政策主要包含预防贿赂和腐败、礼品与招待、政治捐赠、慈善捐款或赞助、商业伙伴管理等方面的内容，确保商业活动符合《联合国反腐败公约》等国际规范。

This policy primarily encompasses the prevention of bribery and corruption, regulation of gifts and hospitality, political donations, charitable donations or sponsorships, and oversight of business partners, ensuring all commercial activities maintain compliance with international standards including the United Nations Convention against Corruption.

2.1 预防贿赂和腐败

2.1 Prevention of Bribery and Corruption

贿赂是指直接或间接向公共部门或私营企业的任何人员提议、承诺、给予（或授权给予）金钱及任何有价值物，以不当影响收受方的正当职责或行为，获取其他不当利益。

内部腐败是指董事或员工为谋取个人不当利益而滥用职权或违反勤勉尽责义务的违法、玩忽职守或不诚信行为，常见有索贿受贿、职务侵占、利益冲突、人事腐败和权色交易等情形。

奇瑞秉持诚实守信、合规经营理念，构建高标准商业道德文化体系，对贿赂行为实施全面禁止政策。根据国内及国际合规标准，明确禁止董事、员工及商业伙伴向任何组织或个人（含代理、顾问、经销商、供应商、客户、公职人员等）提供贿赂或不当利益（包括但不限于金钱、有价证券、财产权益等形式的疏通费）。

奇瑞禁止通过直接或间接方式向第三方机构成员或政府部门职员提供利益以影响商业决策，或在与政府部门或公共机构进行任何事务往来时，向任何该政府部门或公共机构的成员或职员提供利益。

奇瑞严禁接受或索取贿赂回扣，或通过第三方进行利益输送。

奇瑞定期开展风险评估与监督检查，监督公司全员遵守各国反腐败法律法规，同时向商业伙伴传导反腐败政策，终止与涉腐主体的合作。所有商业机会必须通过卓越产品、优质服务及社会责任表现正当获取，任何违反本政策的行为将面临纪律处分及法律追责。

奇瑞与政府及监管机构沟通时，不仅要遵循适用的法律及法规，还需严格遵守政府及监管机构的道德标准和要求；除适当的礼物与招待用于维系良好关系外，公司不允许任何形式对政府及监管机构人员进行贿赂的行为，包括但不限于：现金及现金等价物；过高规格的礼物和招待；任何形式的“疏通费”“通融费”；为政府及监管机构人员的亲属、朋友违规提供工作机会；通过代理人等第三方向政府及监管机构人员进行贿赂或不正当付款。

Bribery refers to the act of directly or indirectly proposing, promising, giving (or authorizing the giving) of money or any valuable item to any personnel in public or private sectors, with the purpose of improperly influencing the recipient's legitimate duties or conduct to obtain improper benefits.

Internal corruption constitutes illegal acts where directors or employees abuse their authority or violate duties of diligence through dereliction of duty or dishonest conduct for personal gain, including but not limited to extortion, embezzlement, conflicts of interest, personnel corruption, and power-for-sex transactions.

Chery adheres to integrity, compliance, and ethical operation principles, establishing a high-standard business ethics culture with a zero-tolerance policy on bribery. Under domestic and international compliance frameworks, directors, employees, and partners are strictly prohibited from offering bribes or improper benefits (including but not limited to cash, securities, property interests, facilitation payments) to any entities or individuals (agents, consultants, distributors, suppliers, clients, public officials, etc.).

Chery prohibits direct or indirect provision of benefits to third-party organization members or government personnel to influence business decisions, or offering benefits to any members/officials of government/ public institutions during official interactions.

The company expressly forbids soliciting/accepting bribes, kickbacks, or benefit transfers through third parties.

Chery conducts regular risk assessments and supervisory inspections to ensure full compliance with anti-corruption laws across all jurisdictions. Chery conveys anti-corruption policies to its business partners, and immediately terminates cooperation with entities involved in corruption. All business opportunities must be obtained through superior products, quality services, and social responsibility commitments. Violations of this policy will result in disciplinary actions and legal prosecution.

When interacting with government/regulatory agencies, Chery not only complies with applicable laws/regulations but also strictly adheres to ethical standards, permitting only appropriate gifts/hospitality for relationship-building while prohibiting all forms of bribery including: cash/cash equivalents; excessive gifts/hospitality; facilitation payments/kickbacks; improper job offers for officials' relatives/friends; and third-party bribery through agents.

2.2 礼品与招待

2.2 Gift Guidelines

礼品是指包括但不限于礼物、现金、艺术品、珠宝、有价证券、支付凭证、优惠折扣、贷款等。其中，支付凭证包括购物券、消费券及各种会员卡、商业预付卡等。

所有礼品赠送及业务招待必须符合业务所在国法律法规、商业惯例及接受方单位合规要求，禁止以现金或现金等价物形式进行。严禁以获取不正当利益为目的的行为，包括但不限于影响招标结果、决策流程等敏感时期；单次礼品价值不得超过当地商业惯例标准，年度累计价值需报备奇瑞报备奇瑞纪检合规部门审核。

绝对禁止向公职人员、客户及合作伙伴人员索要或提供可能被视为贿赂的礼品、招待，不得向外部人员提供不当娱乐活动，包括但不限于违法活动、不道德活动或色情活动；任何可能损害奇瑞声誉或构成不诚信印象的行为均属违规。

所有费用报销需附完整业务说明，并确保提供真实、准确的业务信息及报销资料。虚假申报将触发纪律处分。违反本政策者将面临停职调查，情节严重者移交司法机关，公司纪检合规部门保留对所有礼品、招待事项的追溯审查权。

董事及员工在向奇瑞外部人员提供差旅时应有合理的商业目的，并符合商业惯例及已知接受方单位的合规要求，不得为受邀对象之外的人员支付差旅费用；应确保相关支出符合受邀对象所应遵守的要求，董事及员工不得借向外部人员提供差旅之机获私利。

员工在商业活动中因各地风俗习惯、商业惯例和人际交往礼仪，可能会收到外部各方提供的礼品与招待，其合规管理要求详见礼品与招待的内部细则。

Gifts refer to items including but not limited to presents, cash, artworks, jewellery, negotiable securities, payment instruments, preferential discounts, and loans, with payment instruments specifically encompassing shopping vouchers, consumption coupons, membership cards, and commercial prepaid cards.

All gifts and business entertainment must comply with the laws and regulations, business practices of the country where the business is conducted, and the compliance requirements of the recipient. The provision of cash or cash equivalents is prohibited. Acts aimed at obtaining improper benefits are strictly prohibited, including but not limited to those during sensitive periods such as influencing bidding results or decision-making processes. The value of a single gift must not exceed the local business practice standards. Annual cumulative values must be reported to and reviewed by Chery's Discipline Supervision and Investigation Department.

It is absolutely forbidden to ask for or provide gifts or entertainment that may be deemed as bribes to public officials, clients, and personnel of partners. No improper entertainment activities shall be provided to external personnel, including but not limited to illegal activities, unethical activities, or pornographic activities. Any act that may damage Chery's reputation or create an impression of dishonesty is considered a violation.

All expense reimbursements must be accompanied by a complete business description, and ensure the provision of true and accurate business information and reimbursement materials. False declarations will trigger disciplinary actions. Those who violate this policy will be subject to suspension for investigation, and in serious cases, will be transferred to judicial authorities. Chery's Discipline Supervision and Investigation Department reserve the right to conduct retrospective reviews of all gifts and entertainment matters.

Directors and employees must have a reasonable business purpose when providing travel arrangements to external personnel of Chery, which shall comply with business practices and the known compliance requirements of the recipient. They shall not pay travel expenses for personnel other than the invited objects. It shall be ensured that the relevant expenses comply with the requirements that the invited objects should abide by. Directors and employees shall not obtain personal benefits by providing travel arrangements to external personnel.

Employees may receive gifts and entertainment from external parties during business activities due to local customs, business practices, and interpersonal etiquette. The compliance management requirements for such situations are detailed in the internal rules on gifts and entertainment.

2.3 政治捐赠

2.3 Political Donations

政治捐赠是指从事竞选活动或其他政治相关活动的个人或团体，接受外部对其无偿提供的动产、不动产、不相当对价给付、债务免除或其他经济利益等。

公司、董事及员工和开展业务的商业伙伴均不得从事国内政治捐赠。在确保当地法律允许，有合理性且符合公众利益的情况下，国外政治捐赠获得公司董事会的审批及授权后方可进行，在进行政治捐赠时我们将恪守公开及负责任的原则。

Political donations refer to movable or real property, disproportionate consideration, debt forgiveness, or other economic benefits gratuitously provided by external sources to individuals or organizations engaged in electoral campaigns or political activities.

The company, directors, employees, and business partners are prohibited from engaging in domestic political donations. Foreign political contributions may be made only with the approval and authorization of the company's board of directors, provided that local laws permit, there is reasonable necessity, and it is in the public interest. When making political donations, we shall adhere to the principles of openness and responsibility.

2.4 慈善捐赠或赞助

2.4 Charitable Donations or Sponsorship

慈善捐赠是指基于慈善公益目的而自愿、无偿地赠与财物等活动。

所有捐赠行为须符合国家法律法规及税务要求，严禁以慈善名义谋取商业利益或进行利益交换；捐赠对象仅限于依法注册的公益性社会团体及非营利事业单位，不得向个人、公职人员、客户指定机构或政治相关实体提供捐赠；单笔捐赠金额超过规定限额时，必须提前与受赠方签订书面协议并明确捐赠金额、时间、用途及范围，且资金须通过支票或银行转账方式支付；所有捐赠均需取得受赠方书面确认函，并按会计准则规范入账；捐赠频率与金额须经内部审批程序核准，确保合理性及透明度；公司严格禁止利用慈善活动掩盖腐败行为，违者将依法追究责任。

Charitable donation refers to voluntary and gratuitous transfer of assets based on philanthropic purposes.

All donation activities must comply with national laws, regulations and tax requirements. It is strictly prohibited to seek commercial interests or conduct benefit exchanges in the name of charity. Donation recipients are limited to legally registered public welfare social organizations and non-profit institutions; donations shall not be provided to individuals, public officials, client-designated institutions or politically-related entities. When the amount of a single donation exceeds the specified limit, a written agreement must be signed with the recipient in advance, specifying the donation amount, time, purpose and scope, and the funds must be paid by check or bank transfer. All donations must obtain a written confirmation letter from the recipient and be recorded in accordance with accounting standards. The frequency and amount of donations must be approved through internal approval procedures to ensure reasonableness and transparency. The company strictly prohibits using charitable activities to cover up corrupt practices; violators will be held legally responsible.

2.5 商业伙伴管理

2.5 Oversight of Business Partners

公司须对商业伙伴实施严格管理，强制要求在合作前完成尽职调查（包括背景审查、第三方验证及动态评估），必须签订包含反腐败条款的廉洁协议，明确要求其遵守商业行为准则及公司政策；定期开展廉洁合规培训，确保其知悉并履行反贿赂义务；实施年度审计与突击检查，严禁任何形式的礼品馈赠或利益输送，一经发现立即终止合作并追究法律责任。

The company must implement strict management of business partners, mandatorily requiring the completion of due diligence (including background checks, third-party verification and dynamic evaluation) before cooperation, and the signing of integrity agreements containing anti-corruption clauses, explicitly require compliance with business conduct codes and corporate policies. Regular integrity and compliance training shall be conducted to ensure that they are aware of and fulfill their anti-bribery obligations. Annual audits and spot check shall be carried out; any form of gift-giving or benefit transfer is strictly prohibited. Once discovered, cooperation will be immediately terminated and legal liability will be pursued.

2.6 其他

2.6 Other Regulations

奇瑞董事及员工应按规定保管和使用公司资产，避免出现丢失、损坏、浪费、滥用，并确保在遵守本公司制度的情况下将它们用于合法的商业用途，杜绝利用职务便利挪用或侵占公司资产。

奇瑞致力于推进职场公平，完善工作环境，包容多样性人才，让每一位董事及员工都感受到所从事工作的价值，发挥最大的潜能。本公司严厉禁止任何可能影响职场公平的人事腐败行为。

奇瑞坚持以透明和诚实的方式提供恰当的文档支持商业决策，并根据要求归档；公司要求对每项资产处置、财务支出根据文档保存政策保留真实、完整、准确的账簿与财务记录，以备核查；公司禁止设立体外资金池。

Chery directors and employees shall properly preserve and utilize corporate assets in compliance with regulations, prevent loss/damage/waste/misuse, ensure lawful business applications under corporate policies, and strictly prohibit asset misappropriation or embezzlement through positional advantages.

Chery commits to advancing workplace equity, optimizing working environments, and embracing diverse talents to enable every director/employee to realize their professional value and maximize potential, while strictly prohibiting personnel corruption affecting workplace fairness.

Chery maintains transparent and honest documentation to support business decisions with proper archiving; requires maintaining authentic, complete, and accurate books/financial records for asset disposals/expenditures per document retention policies; and prohibits establishing off-book funds.

3 反贿赂和反腐败培训

3 Anti-Bribery and Anti-Corruption Compliance Training

奇瑞坚持廉洁从业准则，建立全员适用的反贿赂和反腐败培训机制，包括识别和评估贪污风险的机制以及制订监控措施以减低有关风险，并提供资源保障合规培训工作有序开展，确保反贿赂、反腐败培训的针对性和有效性。

Chery Automobile upholds the Integrity Compliance Guidelines and has established enterprise-wide anti-bribery and anti-corruption training mechanisms. These include risk identification and assessment protocols for corruption exposure, monitoring controls to mitigate associated risks, and dedicated resources to ensure structured implementation of compliance training programs, guaranteeing the relevance and effectiveness of anti-corruption education initiatives.

4 违规处理与惩罚

4 Disciplinary Procedure and Penalties

奇瑞所有董事及员工都有义务制止或报告任何违反本政策的行为，公司亦鼓励外部人员报告任何可能违反本政策的行为。奇瑞将严格保密报告人信息，并严格禁止对报告人进行打击报复或给予不公正待遇。

举报邮箱：hegui@mychery.com（合规相关）； yangguang@mychery.com（反舞弊、反腐败等相关）

举报电话：86-553-5923810, 15755338308

在提供举报和咨询信息时，请举报人员注意遵守当地的数据安全与个人隐私保护相关的法律法规。

当发现腐败或贿赂行为时，奇瑞有关部门将启动内部调查程序，对涉事员工进行审查，并根据情节轻重给予警告、降职、辞退等处分，对于涉及刑事犯罪的案件将移交司法机关处理。

All Chery's directors and employees bear affirmative obligations to prevent or report policy violations, while external parties are encouraged to disclose potential breaches. Chery guarantees strict confidentiality of whistleblowers' identities and expressly prohibits any form of retaliation or unfair treatment towards reporting individuals.

Report Email: hegui@mychery.com（related to compliance）； yangguang@mychery.com（related to anti-fraud and anti-corruption）

Report Phone Numbers: 86-553-5923810, 15755338308

When providing reporting and consulting information, please ensure compliance with local data security and personal privacy protection laws and regulations.

When corruption or bribery is identified, Chery's relevant departments will initiate internal investigation procedures to review the involved employees. Disciplinary actions such as warnings, demotions, or dismissals

will be imposed based on the severity of the case, while criminal offenses will be transferred to judicial authorities for legal proceedings.

5 附则

5 Bylaws

奇瑞将适时检讨和更新本《政策》内容，确保其遵循最新监管要求。奇瑞保留对本《政策》的解释权。

Chery will review and update this Policy from time to time to ensure that it complies with the latest regulatory requirements. Chery reserves the right to interpret this Policy.

奇瑞汽车股份有限公司
Chery Automobile Co., Ltd.