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SPEAK UP

ECARX GROUP POLICY

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1. Introduction

1.1 Purpose

ECARX is committed to the highest business and ethical standards as set forth in our Code of Conduct. We want to behave with integrity and treat others with respect. To enable this, we are focused on promoting a culture of open and honest feedback and encouraging everyone to speak-up with concerns related to suspected or actual misconduct and violations of our policies.

This Speak-Up Policy describes how you can speak-up about suspected breaches of the Code of Conduct. It describes the process, so that you know what to expect, and the ways you will be protected when speaking up (confidentiality, anonymity, non-retaliation).

The purpose of the Speak-Up Policy is to:

- provide you with an easy and safe way to raise your concerns;
- treat concerns objectively and with respect; and
- ensure proper follow-up of misconduct matters.

1.2 Scope & Applicability

This document applies worldwide. It applies to all employees of the ECARX Group and its affiliated companies, as well as to individuals deployed by external business partners with whom we maintain business relations, and covers all executives, consultants, contractors, volunteers, interns, fixed-term employees and temporary workers.

1.2.1 Exclusions

It should be noted that the ECARX Speak-Up Policy is only intended for reporting of acts or omissions that are, or lead to, a breach of the law, regulations or our policies by an individual or the company. It is not intended for general employee complaints.

For example: disagreements related to job performance or expectations, interpersonal conflicts, general work environment issues – these kinds of issues should be raised to line management or a HR / People representative, pursuant to local conflict management guidelines or local resolution/grievance processes and/or other requirements, policies or practices.

1.3 Roles & Responsibilities

Roles	Responsibilities
All Employees	All employees of ECARX and individuals contracted by ECARX are required to comply with ECARX policies and raise potential misconduct issues.
Managers	All Managers are responsible for ensuring adherence to this policy. In particular, as key leaders in ECARX they are expected

	to receive Speak-Up reports when an individual chooses to report to them and either: • Follow the Speak-Up Policy to ensure resolution of the report; or • Log the concern in the ECARX Ethics and Compliance Helpline channel.

We also encourage individuals from 3rd party organisations that we engage to report potential misconduct issues and breaches of the ECARX Code of Conduct and / or ECARX Supplier Code of Conduct.

1.4 Examples of Potential Misconduct Issues

Potential Misconduct Issues include but are not limited to:

- Antitrust, unfair competition
- Financial books, records & accounting irregularities
- Disclosure of company confidential / trade secret information
- Conflicts of interest
- Data privacy breaches
- Discrimination
- Sexual Harassment
- Expense fraud
- Fraud / asset misappropriation
- Excessive gifts, bribery, kickbacks
- Improper sales and/or promotional practices
- IT security breach
- Quality assurance issues/ data integrity
- Retaliation
- Policy Breaches
- Other Employee Relations (e.g., inappropriate behaviour, etc.)
- Other (e.g. disclosure and communications infringements, social media guideline violation, etc.)

2. Policy

2.1 When to Speak-Up

You should Speak-Up as soon as possible, or as soon as you suspect that there has been a violation of the Code of Conduct or company values.

We do not expect you to have all the answers and encourage you to use what is described in this policy as a reference point to determine if something is not right.

If you are unsure whether your concern is a matter for Speak-Up, you can ask a question through the Speak-Up channel with details of your concern, requesting clarification on whether it is a matter for Speak-Up. **(Refer to Section 2.4)**

2.2 Why You Should Speak-Up

Speaking up is an essential act that enables us to protect our people, our company, our stakeholders and society as a whole.

As a company we can only address issues, concerns, and instances of misconduct if we know about them. A transparent Speak-Up culture that enables us to identify issues and concerns, also enables us to improve and uphold our commitment to adhere to the highest business and ethical standards.

We understand that it takes courage to speak-up, so therefore we are committed to providing you with an easy and safe way to raise your concerns. No one should be alone when dealing with an ethical dilemma. In this document (our Speak-Up Policy) we clearly explain what your options are, how you can raise your concerns and the support that we give you as part of this process.

2.3 How to Speak-Up

Speak-Up reports can be made to any of the following individuals.

- Your Line Manager (Or another manager)
- Any member of the People Team
- Your Country President
- Your Country Head of HR / People Team
- Any member of the Legal Function
- Any member of the Compliance Function

If you do not feel comfortable speaking with any of these individuals and/or would like to report anonymously, then you can report directly to the ECARX Ethics & Compliance Helpline.

You can make a report to the ECARX Ethics & Compliance Helpline channel online. When making a report through the ECARX Ethics & Compliance Helpline, you can decide if you would like to remain anonymous.

The ECARX Ethics & Compliance Helpline is available 24/7.

The case information is passed – in an anonymised form - onto the ECARX Speak-Up Team. The ECARX Speak-Up Team will only receive details of on an individual reporter if the reporter has chosen to report under their name, instead of anonymously.

2.4 Contact Details for ECARX Ethics & Compliance Helpline

The ECARX Ethics & Compliance Helpline may be accessed worldwide.

To Ask a Question or Seek Clarification or To Submit a Formal Report



2.5 Anonymity

The Company will process anonymous reports to the extent permitted by applicable law. You can choose to remain anonymous when using the ECARX Ethics & Compliance Helpline unless you are in a jurisdiction in which anonymised Speak-Up reports are not legally allowed. In certain jurisdictions, anonymous reports may not be accepted, may not receive the same legal protections, or may be subject to local legal requirements.

2.6 What Happens after you Speak-Up?

2.6.1 Communications you will receive

Immediately on submission of the report via the ECARX Ethics & Compliance Helpline the Speak-Up Team will send you an acknowledgment of receipt within seven days.

Your report will be evaluated and assessed, and you might be asked follow-up questions if you provided an email address. Then the appropriate course of action will be determined. At all times you will be able to check on the status of your report by submitting a new request and a return email address.

You will receive final feedback on your report within three months after the acknowledgment of receipt, if you requested a response and provided an email address.

Please note that we may not always be able to give you details of the outcome of the investigation for reasons of confidentiality, privacy and the legal rights of the involved parties. All parties involved, including the accused, are entitled to confidentiality.

2.6.2 Speak-Up Team response.

All Speak-Up Reports will be centrally collated and reviewed by the Speak-Up Team.

The Speak-Up team will determine the category of the case, if it requires investigation and whether it should be investigated globally or locally.

2.7 Investigations

The Investigation will be completed by a Local or Global team with the support of investigative functions (Audit, Security, HR, Legal and / or Compliance) as has been determined as appropriate by the Speak-Up Team. This will be done under the oversight of the Board of Directors.

The Investigation will be completed in accordance with the ECARX Case Management & Investigation Protocol.

If you participate in or learn about an investigation, you must keep the matter confidential.

Outcomes of investigations – by reference to specific investigations - will fall into one of the following categories: -

i) Substantiated (In this case necessary Remedial Actions will be determined by an Internal Review Committee).
ii) Not Substantiated.
iii) Resolved – Allegations were not found to be true and/or alternative information came to light that confirmed that no misconduct or breach of policies occurred.

Please note that not all issues raised will automatically lead to a formal investigation. Sometimes following another course of action is better for all parties involved (e.g., mediation). Furthermore, sometimes there is insufficient information for an adequate investigation to take place and there is no possibility of obtaining further information.

2.8 Timelines for Conclusions

All cases reported via the ECARX Ethics & Compliance Helpline channel will either be resolved or have investigations completed within a period of no more than **90 days from the date of the report**.

The reporter will be notified of the outcome of their reported case within this time-period, if requested and the reporter provided an email address.

2.9 How we protect you when you speak-up

Protecting your right to speak up is essential. Protecting you as a reporter is one of the main purposes of this policy. Below, some key principles are highlighted:

2.9.1 Confidentiality

All questions or issues raised are treated confidentially. Information will only be shared with a limited number of people on a strict need-to-know basis. Information will only be shared outside of this group if we are required to do so by law or an important public interest is at stake.

In principle, we are obliged to inform any person under investigation that he or she is the subject of a report being investigated as soon as possible (this may be delayed if there is a substantial risk that this notification jeopardizes the investigation or the gathering of evidence.). Your identity will not be disclosed.

Regardless of all measures taken to protect your confidentiality, it cannot be guaranteed that your

identity will not be inferred by subjects during an investigation.

2.9.2 Professional Investigation Procedures

The Speak-Up Team is responsible for ensuring that all investigations it requests and directs are professional, confidential and based on objective, precise fact-finding. An ECARX Case Management & Investigation Protocol is in place to ensure this.

2.9.3 Anonymity

You can share information anonymously by using the ECARX Ethics & Compliance Helpline. This offers you the best protection. Please note that the Speak-Up Team has the responsibility to anonymise any information that comes in, in order to protect your identity. The ECARX Ethics & Compliance Helpline makes safe dialogue possible in an anonymous way.

2.9.4 Safeguarding your Privacy

ECARX is committed to protecting the privacy of everyone involved in the Speak-Up process. We will do everything within reason to safeguard personal data from unauthorized access and processing. Any personal data obtained will be processed in line with our privacy policy and will only be used for the purposes explained in this policy or to comply with the law.

2.9.5 Non-Retaliation

We encourage speaking up and any person that speaks up is protected. The right to non-retaliation is stated in our **Code of Conduct** and the **ECARX Non-Retaliation Policy**. ECARX will not tolerate any instances of violation of this right.

Any form of **retaliation** against those who speak up may lead to disciplinary measures. If you notice or experience any retaliation, you can report this via one of our Speak-Up channels.

2.10 How we protect you if you are accused

A person who is subject to a concern needs our utmost protection. The presumption of innocence is a leading principle. The Speak-Up Team is responsible for protecting the rights of anyone who is accused - or otherwise involved – in any issue.

2.10.1 Confidentiality

All questions or issues raised are treated confidentially. Information will only be shared with a limited number of people on a strict need-to-know basis.

2.10.2 Solid Investigation Procedures

The Speak-Up Team is responsible for professional, confidential and precise fact-finding. Procedures stated within the ECARX Case Management & Investigation Protocol are in place to make sure this is achieved.

2.10.3 Information Rights

When a person is officially under investigation, they need to be notified about this fact as soon as possible, unless there is a substantial risk of destruction of evidence and/or an impediment to the investigation.

2.11 Insufficient Information

The Speak-Up Team has the right not to proceed with a case due to limited information as determined via the ECARX Case Management & Investigation Protocol.

2.12 Reporting to External Bodies

We encourage you to Speak-Up internally and make your reports via the ECARX Ethics & Compliance Helpline, to enable the Company to address any issues first.

However, it is also possible for you to report suspected or actual misconduct externally to appropriate Regulatory Bodies in your country and/or in any jurisdiction in which ECARX has a presence.

3. Internal Controls

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

4. Breaches & Abuse of the Speak-Up Policy

The ECARX Speak-Up Policy only applies to reports made in 'good faith' relating to misconduct, potential misconduct and violation of our Code of Conduct and supporting policies.

We take the practice of reporting in 'bad faith' or any other form of misuse of this policy very seriously. Such acts are considered to be a serious breach of the Code of Conduct. Employees who abuse the Speak-Up Policy will be subject to disciplinary actions.

In alignment with our Code of Conduct, breaches of this policy can result in remedial, corrective, or disciplinary actions up to and including termination of employment. Actual or suspected incidents of misconduct should be reported via the ECARX Ethics & Compliance Helpline.

ECARX guarantees non-retaliation and confidentiality, to the extent legally possible, for good-faith reports of such breaches.

5. Definitions

Term	Definition
Employee	Any employee of the ECARX Group or any of its affiliates
3rd Party Individual	Any individual engaged by a ECARX Group Company on a contract, or any individual employee or representative of a company engaged by ECARX Group Company.
Internal Review Committee	An internal, cross-functional and/or cross-divisional, committee that is constituted by Compliance to make recommendations on sanctions & remediation that should be taken in response to substantiated allegations following an investigation into a report received via the ECARX Ethics & Compliance Helpline.

Misconduct	Conduct that violates the commitments in the ECARX Group Code of Conduct and all policies related to these commitments; or Conduct that is illegal.
ECARX or the ECARX Group, ECARX Group Company	ECARX Company, the ECARX Group and any company that is a subsidiary or affiliate of an ECARX Company. This includes companies in which ECARX is part of a Joint-Venture (JV)
Reporter	An Individual – employee or 3rd party individual – who raises a concern of suspected or actual misconduct, including on behalf of another individual.
Retaliation	Any punishment in any form – physical, psychological or economic - of an individual:
	• For raising a good faith concern of suspected or actual misconduct through any channel; or • For the cooperation in an investigation of misconduct
Speak-Up	The global channel – via ECARX Ethics & Compliance Helpline provided by ECARX for the reporting concerns of suspected or actual misconduct. AND Reported concerns of suspected or actual misconduct raised by an individual and communicated to any of the following: • Your Line Manager (Or another manager) • Any member of the People Team • The Country President • The Country Head of HR • Any member of the Legal Function • Any member of the Compliance Function
Reports of suspected or actual misconduct raised through the ECARX Speak-Up	Reports raised through any channel as defined above for ECARX Speak-Up Policy.
Reporting in 'good faith'	Reporting a concern of suspected or actual misconduct honestly, openly and without hidden motives.
Reporting in 'bad faith'	Deliberately making a report that a reporter knows is false, vexatious or untrue, out of spite or for personal gain.
Speak-Up Team	An internal cross-functional team constituted to manage the triage of Speak-Up reports, allocate responsibilities for investigation and direct the investigation of reports through to conclusion.

6. Exceptions to this Policy

Exceptions to this Policy are not permitted.

7. Adaptations to this Policy

Adaptations to this Policy are not permitted.

8. Policy Review

This Policy will be reviewed once every two years in accordance with revisions to the Code of Conduct or earlier if legislative and regulatory changes require a review.

9. Related and Referenced Documents

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

10. Document Owner

This document is owned by ECARX Group Compliance.

11. Document History

Version	Approved Date	Effective Date	Change	Next Revision 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
3.0	30 September 2026	30 September 2026	Various	27 August 2027 (early review to align with the Code of Conduct revision cycle)