27 August 2025

CONFLICTS OF INTEREST

ECARX GROUP

Contents

1. Introduction

1.1 Purpose

ECARX is committed to the highest business and ethical standards. We want to treat all individuals and our business stakeholders with integrity and respect and foster a sense of trust.

This global Conflicts of Interest Guideline (“Guideline”) builds on our Code of Conduct commitment to ensure that our personal interests do not influence our business judgement or decision-making. We must handle conflict of interest situations in a professional and ethical manner to avoid any situations in which Conflicts of Interest damage our personal reputation and that of ECARX.

Identifying, addressing, and avoiding and/or disclosing Conflicts of Interest is an important part of demonstrating objectivity and integrity when executing our responsibilities and duties at ECARX.

All capitalised terms are defined in the Section 7.

1.2 Scope & Applicability

Scope: This Guideline contains ECARX global standards and it applies to Employees of all ECARX Group companies.

Applicability: The Guideline sets out the roles & responsibilities, principles, types of Conflicts of Interest for the purposes of:

a. Identifying a Conflict of Interest and situations that may result in an actual, potential, or perceived Conflict of Interest; and
b. Appropriately managing a Conflict of Interest in accordance with legal requirements and the goals of accountability and transparency.

In some countries, more stringent applicable laws and regulations may supersede the principles set out in this Guideline. Please see your local advice and/or speak to your local legal counsel.

1.3 Roles & Responsibilities

Roles	Responsibilities
All Employees	All Employees are responsible for understanding and adhering to the principles set out in this Guideline. Employees are required to identify situations that are or could be perceived to be a Conflict of Interest and to avoid them wherever possible. When Conflicts of Interest cannot be avoided, it is the individual Employee’s responsibility to disclose Conflicts of Interest

	situations as soon as they arise and ensure that they complete any agreed upon actions to eliminate or mitigate the Conflict of Interest.
Managers	Managers should strive to create an environment where all Employees feel safe to discuss and disclose any potential Conflicts of Interest. All Managers are expected to: • Inform their Employees and direct reports about this Guideline and the importance of it. • Lead by example, demonstrating compliance with this Guideline at all times. • Serve as primary point of contact for Employees and provide guidance with respect to Conflicts of Interest and how to disclose. • Ensure that employees complete annual Conflict of Interest declarations as required

2. Principles

This section outlines 4 principles that Employees and Managers should use to guide their actions and response in relation to Conflicts of interest - identify, avoid, disclose, and address.

2.1 Identify

Employees are expected to recognize when they potentially have, or could be perceived as having, a Conflict of Interest.

A Conflict of Interest arises when Employees use their position in ECARX or place their personal interests before the interests of ECARX and where such position or personal interests improperly influence or could be seen as improperly influencing their business judgments, decisions, or actions for the purposes of gaining an unfair advantage for their personal benefit or for the benefit of that Employee's families and friends.

Making judgments, taking decisions, or pursuing actions objectively when facing a Conflict of Interest may be difficult and may have legal, reputational and regulatory consequences for the individual and for ECARX.

Any Employee of ECARX who is in doubt about whether there is a Conflict of Interest should consult their Manager, HR Business Partner, and/or Legal or Compliance for guidance.

2.2 Avoid

ECARX respects Employees' rights and choices and does not wish to interfere with their personal lives. However, as part of their employment with ECARX, Employees have an obligation to maintain the highest possible standard of integrity in all your business relationships, never use your authority or position for personal gain, and at all times act with impartiality, independence, and integrity.

Employees should therefore avoid Conflicts of Interest, particularly those detailed in **Section 3**. **Types of Conflicts of Interest** which are expressly prohibited. Where avoidance is not possible, Employees should disclose such Conflict of Interest.

2.3 Disclose

Having a Conflict of Interest is not necessarily wrong, however, it can become a problem to the individual or ECARX.

Employees are therefore required to disclose any actual, potential, or perceived Conflicts of Interest in the online Conflicts of Interest disclosure tool (CoI Tool). If you suspect someone else is acting with a Conflict of Interest, please follow our SpeakUp procedure detailed in the SpeakUp Policy.

For countries that, due to technical and/or legal or regulatory reasons, do not have access to an online Conflicts of Interest disclosure tool, paper-based disclosure forms should be used to disclose conflict of interest. The principles and process remain the same whether disclosing online or on paper.

Disclosure must take place as soon as the Employee identifies that they may be in a Conflict of Interest situation. Employees must ensure that any disclosures made are updated if any circumstances change.

Employees are required to provide an attestation in the Conflicts of Interest Tool (via Conflicts of Interest Form) on an annual basis that :-

- they have disclosed all Conflicts of Interest; or
- they do not have any Conflict of Interest.

Talent Acquisition and HR must share the ECARX Code of Conduct and this Conflict of Interest Guideline with job candidates who receive offers and ask that they disclose any conflicts of interest they may have with ECARX before accepting any offer. Disclosures made during the hiring process should be discussed with and addressed by the hiring Manager before an offer of employment is made.

2.4 Address

Disclosing a Conflict of Interest is only the first step. Every conflict must be addressed by an Employee, and any other parties as relevant in order to eliminate, reduce, or approve and disclose the associated risks.

Most Conflicts of Interest can be addressed through pro-active and open dialogue between Employees and internal functions qualified to help. ECARX expects all Employees to:

- Assess the Conflict of Interest situation disclosed by the Employee
- Fairly evaluate options to address the conflict.
- Consult the HR Business Partner, Legal and/or Compliance in addressing the conflict depending on the category of Conflict of Interest as described below:

Types of Conflict of Interest	Relevant Party involved in review, closure & disclosure
Related Parties & Related Party Transactions	Legal, Finance & ECARX Board
External Mandates with Non Related Parties **Personal Financial Interests**	Legal Legal
Outside Employment & Outside Business **Family & Personal Relationships** **Non-executive Directorships**	Legal HR / People Organisation Legal
Other External Engagements **Gifts, meals, travel, entertainment and other favours** **Relationships with Third Parties & Partners**	Compliance Compliance Compliance
Other situations not listed above	Compliance

- Make a pragmatic and informed decision to address the Conflict of Interest so that risks to ECARX are minimized and their personal interests as an Employee are protected as far as possible.

Functions involved in the resolution of Conflicts of Interest are required to:-

- Communicate the decision and its reasoning to the Employee and follow up to ensure the Employee understands and complies with it.
- Retain documentation of these decisions and actions through the Conflicts of Interest disclosure tool (or paper-based form where the online system is not in place). In the latter situation, provide a copy of the documentation to the Employee.

3. Types of Conflicts of Interest

The following section lists some common types of Conflicts of Interest. It should be noted that the lists and examples provided are not exhaustive.

Note, a Conflict of Interest is not automatically prohibited by this Guideline unless explicitly stated.

3.1 External Engagements

3.1.1 Outside Business and Outside Employment

Explicitly Prohibited

Outside business and outside employment arrangements that are explicitly prohibited by this Guideline include:-

- Any kind of paid or unpaid engagements with an ECARX supplier, business partner, customer or competitor, unless it clearly does not influence and cannot be perceived as influencing an Employee's business judgment or it is expressly requested by ECARX and is documented accordingly.

- External engagements – whether or not involving a supplier, business partner, competitor or customer – which could require the use or disclosure of ECARX confidential information.

To be considered on a case by case basis

Other external engagements (including employment outside of ECARX) may create, or appear to create, a Conflict of Interest. This concern applies not only to traditional employment relationships, but also to the receipt of fees for consulting, honoraria, and other payments for services.

Each situation should be determined on a case-by-case basis and follow the principles outlined in Section 2.

3.1.2 External Mandates with Non-Related Parties

External Mandates are any mandates that Employees hold in a board of directors, in an advisory board or in a similar supervisory body of an external organization ***in which the Employee does <u>not</u> have a financial interest.***

(Where the Employee has a financial interest, please refer to 3.2 Financial Interests)

Explicitly Prohibited

An Employee may not serve on another entity's Board or Supervisory Body where the entity:-

- Does or seeks to do business with ECARX
- Competes with ECARX
- Could otherwise have an impact on ECARX

This is because such situations could:-

- lead to the perception that the Employee might sacrifice ECARX's business interests to benefit the entity on whose boards they would serve;
- raise questions about whether the Employee is protecting ECARX's confidential information; or
- interfere with the ability of the Employee to perform his/her duties for ECARX due to the time commitment spent on board activities.

To be considered on a case by case basis
All other external mandate activities with non-Related Parties should be determined on a case-by-case basis and follow the principles outlined in Section 2.

3.2 Personal Financial Interests

Personal investments can create Conflicts of Interest if Employees make decisions for ECARX that concern a company in which they have a personal financial interest.

Explicitly Prohibited

<u>Ownership of Stock and/or Other Financial Interests</u>

Employees must not own (directly or indirectly) any stock or other financial interest in a publicly traded company equal to or greater than 5% in any company which competes with or does (or seeks to do) business with ECARX. If the Employee's ownership interest (directly or indirectly) in such publicly traded company increases to more than 5%, the Employee must immediately disclose this as a Conflict of Interest to their Manager and Legal.

No Employee may hold any ownership interest in a privately held company that is in competition with ECARX.

No Employee may hold any ownership interest in a company that has a business relationship with ECARX if such Employee's duties at ECARX include managing or supervising ECARX's business relations with that company.

No Employee may have any financial interest (ownership or otherwise), either directly or indirectly through a spouse or other family member, in any other business or entity if such interest adversely affects the Employee's performance of duties or responsibilities to ECARX, or requires the Employee to devote time to it during such Employee's working hours at ECARX.

Loans or Other Financial Transactions

No Employee may obtain loans or guarantees of personal obligations from, or enter into any other personal financial transaction with, any company that is a material customer, supplier or competitor of ECARX. This Guideline does not prohibit arms-length transactions with recognized banks or other financial institutions.

Permitted Financial Interests

A Director or any family member of such Director (collectively, "Director Affiliates") or a senior Employee or any family member of such senior Employee (collectively, "Officer Affiliates") may continue to hold their investment or other financial interest in a business or entity (an "Interested Business") that:

(1) was made or obtained either:

- before ECARX invested in or otherwise became interested in such business or entity; or
- before the Director or senior Employee joined ECARX (for the avoidance of doubt, regardless of whether ECARX had or had not already invested in or otherwise become interested in such business or entity at the time the Director or senior Employee joined ECARX);

(2) may in the future be made or obtained by the Director or senior Employee:

- provided that at the time such investment or other financial interest is made or obtained, ECARX has not yet invested in or otherwise become interested in such business or entity; or
- provided that such Director or senior Employee shall disclose such investment or other financial interest to the Board.

Any Director Affiliates or Officer Affiliates shall refrain from participating in any discussion among senior Employees of ECARX relating to an Interested Business and shall not be involved in any proposed transaction between ECARX and an Interested Business.

Before any Director Affiliate or Officer Affiliate:

(i) invests, or otherwise acquires any equity or other financial interest, in a business or entity that is in competition with ECARX; or
(ii) enters into any transaction with ECARX,

the related Director or senior Employee shall obtain prior approval from the Audit Committee of the Board.

3.3 Corporate Opportunities

Explicitly Prohibited

No Employee may use corporate property, information about the company, nor their position with ECARX to secure a business opportunity that would otherwise be available to ECARX. If an Employee discovers a business opportunity that is in ECARX's line of business through the use of ECARX's property, company information or position, the Employee must first present the business opportunity to ECARX before pursuing the opportunity in his/her individual capacity.

3.4 Related Parties & Related Party Transactions

ECARX is required to conduct an appropriate review and have ongoing oversight of all Related Party transactions. Any Related Party transactions must be approved by the ECARX's Audit Committee or another independent body of the Board of Directors.

The Legal Department in each country in which ECARX has an office is responsible for ensuring that ECARX has in place the local policies and processes required to appropriately manage Related Parties and Related Party Transactions and provide the necessary information to fulfil ECARX's disclosure and reporting obligations.

A list of Related Parties is maintained by the Finance function with oversight from Legal. Suppliers and Third parties shall be screened against this list.

3.5 Family & Personal Relationships

3.5.1 Family & Personal Relationships in ECARX

The employment of a Family Member may raise questions regarding confidentiality, objectivity, fairness and integrity in work relationships. This can negatively impact ECARX's ability to retain Employees and otherwise diminish ECARX's reputation for ethical and fair conduct.

In addition romantic and/or sexual relationships between Employees who are consenting adults may impair the judgement of employees in specific situations

Explicitly Prohibited

Employees must not:

- Be in a supervisory, subordinate, or control relationship (e.g., having influence over conditions of employment) with the Family Member or with an employee with whom they are in a romantic or sexual relationship; or

- Be involved in any hiring/retention decision regarding the Family Member or the Employee with whom they are in a sexual relationship (including internal/external hiring, retention of external service providers/contractors and internal transfers).

3.5.2 Family & Personal Relationships outside of ECARX

ECARX recognises the possibility for an Employee to have a Family Member who works for a supplier, customer, or competitor. This does not automatically mean that there is a conflict of interest.

Employees should disclose the relationship and discuss the relationship with either their Manager, HR/People Organisation, Legal or Compliance as such situations need to be assessed, considering:

- whether the ECARX Employee is involved in an ECARX business relationship with the Family Member; and
- the access that each individual has to their respective employer's confidential information.

3.6 Gifts, Meetings, Travel & Entertainment

Receiving gifts, meals, hospitality, travel and entertainment can serve important business purposes. However, Employees must be careful to avoid any conduct that would constitute a conflict of interest. Limits stated in local ECARX policies for gifts, meals and hospitality must be applied and followed.

Explicitly Prohibited

Employees must not directly or indirectly solicit or accept from any actual or potential ECARX supplier, customer or competitor:

- Cash or cash equivalents (e.g., stocks, gift certificates, discounts not based on a collective agreement, etc.);
- Gifts, unless it is reasonable to believe that accepting the gift does not influence and cannot be perceived as influencing the business judgement of the Employee. Where refusing a gift might reasonably be interpreted as giving offence or causing embarrassment, a gift may be accepted on behalf of ECARX but must be disclosed.
- Meals, hospitality, travel, or entertainment, unless it serves only Employee's business interests, is accompanied by a representative of the business providing it and does not influence (and cannot be perceived as influencing) the business judgment of the Employee.

3.7 Other

As it is not possible to list all situations that may give rise to a conflict of interest, the situations described above are examples of common conflict of interest situations and are not exhaustive.

Any other situations that may arise that involve an Employee's personal interests conflicting with the interests of ECARX should be - disclosed and - addressed in accordance with the general principles of this Policy AND any local laws, regulations and ECARX policies in the country in which the Employee is based.

4. Internal Controls

Internal controls for this Conflicts of Interest Guideline document will be stored in the ECARX Internal Control Register.

5. Breaches of this Guideline

As stated in our Code of Conduct, breaches of our policies and guidelines or local laws will result in remedial, corrective, or disciplinary actions up to and including termination of employment.

6. SpeakUp

Actual or suspected incidents of misconduct in relation to Conflicts of Interest should be reported to via ECARX SpeakUp.

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

7. Definitions

Term	Definition
Conflict(s) of Interest	[Refer to Section 2.1]. Specific examples are outlined in section 3.
Employee	Any employee of the ECARX Group or any of its affiliates.
Third Parties or Third Party	Any company engaged by an ECARX Group Company on a contract, or any individual employee or representative of a company engaged by ECARX Group Company.
Family Member	Any child, stepchild, parent, stepparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law or sister-in-law of a person, and any person (other than a tenant or an Employee) sharing the household of such person.
Related Party	Any person who is or was an executive officer, director, or nominee for a director of ECARX and their Family Member, any shareholder owning more than 5% of any class of 'ECARX's voting securities, or Family Member of any such person.
Related Party Transaction	Any transaction, arrangement or relationship, or any series of similar transactions, arrangements or relationships, in which (i) ECARX or any of its subsidiaries is or will be a participant; and (ii) any Related Party has or will have a direct or indirect interest *in both sides of the transaction.* This also includes any material amendment or modification to an existing Related Party Transaction.
ECARX, ECARX Group, or 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).

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
SpeakUp	The global channel – via phone, web or app – 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 : • Any 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
Reporting in 'good faith'	Reporting a concern of suspected or actual misconduct honestly, openly and without hidden motives.

8. Review

This Guideline 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 Third Party Risk Management 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