27 AUGUST 2025

THIRD PARTY RISK MANAGEMENT

ECARX GROUP POLICY

Contents

1. Introduction

1.1 Purpose

ECARX is committed to sustainable and ethical business. We comply with all applicable laws and regulations in all the countries in which we operate.

Beyond compliance with applicable laws and regulations, we are committed to ethical conduct.

The purpose of this procedure is to ensure that ECARX develops and maintains business relationships with reputable and qualified business partners who operate at the highest ethical standards and in accordance with our policy commitments to Anti Bribery and Human Rights.

This procedure is also intended to prevent ECARX's reputation being affected by any inappropriate conduct of Third Parties by way of association or participation.

1.2 Scope & Applicability

The scope of this document is global.

All ECARX entities and operations that engage third parties in the course of direct and indirect procurement and business development are expected to apply this policy.

1.3 Your Responsibilities

	Responsibilities
All Employees	• Ensure that they understand the requirements of this policy as it applies to their role and any involvement that they have in the selection, decision making, onboarding, or ongoing management of Third Parties • Complete all required training in relation to this Policy
All Managers and 'Business Owners'	• Make sure that any Third Parties that they engage with have this Policy and approach applied to their initial assessment, onboarding and ongoing relationship management • Make sure all team members have access to and understand this Policy • Make sure your team members complete training on this Policy • Create an environment in which members of your team feel confident and able to raise concerns in relation to Third Party engagements
Legal & Compliance	• Provide input and knowledge to Managers and Business Owners on the different risk areas and requirements • Review and assess the risk associated with the Third Parties • Determine the appropriate remediation activities to mitigate risks
Procurement	• Ensure that due diligence and ongoing screening is maintained on all Third Parties within scope of this Policy
Finance	• Maintain lists private to ECARX that are used in the Third Party Risk Management process, e.g. Related Party List
Suppliers and Business Partners	• Abide by this Policy, in addition to the ECARX Supplier Code of Conduct and to the laws and regulations in the places where they operate. • Ensure that those principles are communicated to, and complied with, by their employees and subcontractors.

1.4 SpeakUp

ECARX encourages employees and external Third Parties to express their views and opinions, and to point out unacceptable behaviours and actions. Breaches or suspected misconduct in relation to this Policy can be reported via ECARX SpeakUp. The SpeakUp policy is available on the ECARX Group Website via this link.

1.5 Non-Retaliation

ECARX is committed to protecting individuals who make a report or participate in an investigation in good faith. Retaliation against any employee who raises a concern in good faith will result in disciplinary action, up to and including dismissal of the retaliating employee. Please see the **Non-Retaliation Policy** for more information.

2. Policy

2.1 Requirements for Engagement of Third Parties

ECARX must only engage Third Parties if all of the following requirements are met:

- There is a legitimate need for the services or the goods that they provide;
- The services and goods are priced no more than Fair Market Value. "Fair market value" represents the estimated market value of a product or service, based on what it would likely fetch in the current market, given prevailing conditions and without external pressures or unusual circumstances influencing the transaction;
- The Third Party is suitable from a risk management perspective after screening and assessment in a robust Due Diligence process;
- There is a written contract or other written document with a similar legal effect (e.g., Purchase Order); and
- Approval for the financial expenditure in relation to the Third Party is granted in accordance with the ECARX internal DOA (Delegation of Authority).

An exception may be granted for situations of 'Emergency Procurement' where the above requirements may not be able to be met.

Situations that may necessitate emergency procurement include:

- Unforeseen events: natural disasters or significant changes in governmental or industry laws and regulations affecting operations;
- Supply and demand challenges: supply chain disruptions or sudden surges in demand;
- Other issues: situations where ECARX is unable to fulfill contracts on time due to reasons like key equipment malfunction or insufficient inventory.

2.2 Third Parties within the Scope of this Policy

This policy must be applied to any Third Party that ECARX seeks to engage for the purposes of **procurement** and **business development**. This includes the following categories of Third Parties:-

a. All suppliers, vendors, service providers and similar external parties who provide goods or services that ECARX uses as inputs into any of its final products;
b. Business development partners;

c. Other strategic partners with whom ECARX signs contracts or co-operation agreements (for example Co-Marketing, Joint R&D and Joint production partners; and
d. All parties to Joint ventures in which ECARX has a holding.

In addition, all of the above-mentioned categories of third parties we work with must meet the standards and expectations included in our **Supplier Code of Conduct.**

2.3 Areas of Risk

2.3.1 Regulatory Risks

The key areas of risk that ECARX's Third Party Risk Management focuses on includes the following:

a. Anti-Bribery & Corruption, including:
   i. Politically Exposed Persons
   ii. State owned companies
   iii. Ultimate beneficial ownership
b. Anti-trust and fair competition
c. Human Rights (Including Modern Slavery and Child Labour)
d. Labour Rights
e. Health, safety and environment
f. Data Privacy
g. Information Security
h. Global Sanctions
i. Sanctions Control & ownership (including subjects of implied sanctions)
j. Export / Trade Restrictions
k. Other international exclusion lists
l. Related Parties, and other specific internal ECARX lists

It should be noted that this list of risk areas is not exhaustive. ECARX may– at any time – add additional risk areas to this framework in response to regulatory requirements, stakeholder expectations, sustainability requirements or to uphold its business integrity.

ECARX may also, screen external databases for adverse media reports on Third Parties deemed to be high or medium risk.

2.3.2 Other Risks

Additional non-regulatory but material risks posed by Third Parties should also be considered. Examples include transactional risks, delivery risks, operational risks and reputational risks.

2.4 Sources of Risk Intelligence and Coverage

To ensure an appropriate assessment of risks, ECARX will use reputable external risk intelligence and watch-list providers to help screen and complete due-diligence on Third parties.

However, the review, assessment and engagement decision relating to Third Parties after assessment is solely ECARX's internal responsibility.

2.5 Components of Third Party Risk Management

The risk assessment of Third Parties who fall within the scope of this policy will include the following key steps:

<table>
<tr><th></th><th>Stage</th><th>Activity</th></tr>
<tr><td></td><td>Before any business engagement with ECARX</td><td>Due Diligence

The Third Party completes a Due-Diligence Questionnaire.
ECARX will conduct a risk and compliance check to review, audit and verify facts and about the Third party and assess and evaluate any risks associated with engaging with it. This will include consideration of a Third Party’s background, financial stability, legal and compliance history, business practices and overall reputation.

Screening
This consists of checks against international watch lists, sanctions lists and ECARX private lists.</td></tr>
<tr><td></td><td>ECARX Decision on Engagement</td><td>Decision on Engagement
This decision may fall in one of the following categories:
Approval to Engage
Approval to Engage only if specific mitigation factors are put in place through either a remediation plan and/or additional contractual clauses
Unable to Engage
The decision and reasons for the decision should be documented, and appropriate functions involved as required, e.g., Sales, Product Development, Business Owner function, Finance.

If the risk-rating of any supplier during the due diligence is high, inclusion of Legal & Compliance in the engagement decision is mandatory.

Documenting decisions
The decision taken and the reasons for it must be documented and must include at a minimum the following:-
The business case stating the requirement to engage the Third Party;
The engagement decision reached;
The reasons, inputs and approvals of each individual function involved in the decision noted;
The completed questionnaire received from the Third Party;
A summary report of the due diligence carried out on the Third Party and the results of screening.</td></tr>
<tr><td></td><td>Contract / Agreement</td><td>Contracting
Completion of written contract or agreement between ECARX and the Third party. Where necessary, the contract may include specific contractual clauses as part of the mitigation factors put in place for a Third Party following the screenings and decision making.</td></tr>
</table>

During Business Engagement	**Ongoing Screening** To be completed on an ongoing basis with any alerts and issues investigated and assessed for risk. **Repeated Due-Diligence** Completion of a questionnaire by the Third party and verification of information they provide must be repeated at the earliest of : • once every two years (for long term engagements); • on contract renewal; • when ECARX becomes aware of any changes to the Senior Management of the Third Party Company. "Senior management" refers to the high-ranking executives, including but not limited to the Chief Executive Officer, Chief Financial Officer, Chief Operating Officer, and other key departmental heads, responsible for guiding the strategic and operational decisions of the Third Party; and • when ECARX becomes aware of a change in the structure of the Third Party. **Ongoing Monitoring & Auditing** This is important to ensure that the Third Party continues to operate in accordance with expectations and agreements. Auditing may include physical audits where necessary.

The due-diligence, screening and ongoing monitoring should include:

- the legal entity of the Third Party, its board, directors and senior management; and
- any legal entities that own a part or all of it, together with individuals on those entities' Board, directors and senior management.

2.6 New Business & Joint Ventures

Before entering into an agreement for new business or entering into a joint venture, adequate risk-based due diligence and screening must be completed on all Third Parties involved. In addition, a remediation plan should be developed and implemented to address identified issues.

New business means any transaction involving the takeover or acquisition of all or any part of a third party or business, or the merger of an ECARX business with another company or business.

2.7 Document management and retention

All documents relating the Third Party Risk Management process such as the due-diligence report and findings, screening alerts, media findings, internal engagement decision, remediation plans, contracts, etc. must be stored in a central repository and be readily available for audit purposes.

3. Definitions

Term	Definition
Third Party	Any natural person or legal entity with whom ECARX interacts and who, due to the nature of their business, poses a particular level of risk in any of the risk areas stated in Section 2.3.
Direct Procurement	Procurement of goods and services that are used as inputs into the making of a final ECARX product which ECARX then sells onwards.
Indirect Procurement	Procurement of good and services that are not used as inputs into ECARX products.
Business Owner	The ECARX Head of Function/Business Area that requires the services provided by the Third Party and who will own the business relationship with the Third Party.
Fair Market Value	The estimated market value of a product or service, based on what it would likely fetch in the current market, given prevailing conditions and without external pressures or unusual circumstances influencing the transaction.
Due Diligence	A process that involves a risk and compliance check to review, audit and verify facts and information about a specific Third Party and assess and evaluate any risks associated with engaging with them. It involves gathering information about a Third Party's background, financial stability, legal and compliance history, business practices and overall reputation and includes requesting the Third party to complete a questionnaire.
Screening	A process of evaluating and investigating a Third Party in accordance with a systematic and established procedure – commensurate with best-practice international standards – to assess suitability for the specific business need or purpose that ECARX needs it to fulfil.
Senior Management (Of Third Party)	The high-ranking executives, including but not limited to the Chief Executive Officer, Chief Financial Officer, Chief Operating Officer, and other key departmental heads, responsible for guiding the strategic and operational decisions of the Third Party
New Business	New business means - any transaction involving the takeover or acquisition of all or any part of a Third Party or business, or - the merger of an ECARX business with another company or business. - The set up by ECARX of a new office, business operation or business unit which will require engagement of Third Parties
Joint Venture	Any type of agreement or arrangement between ECARX and one or more Third Parties to create or own and operate an enterprise as a separate business for the mutual benefit of ECARX and the Third Party or Third Parties.
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).

4. Implementation

This ECARX Third Party Risk Management Policy was approved by the ECARX Executive Leadership Team on 27 August 2025.

It is to be implemented by all ECARX companies and affiliates with an effective date of **August 27, 2025**. It is applicable to all operations of the ECARX Group.

5. Exceptions to this Policy

The only exceptions to this policy are as stated in Section 2.1 – Emergency Procurement.

6. Breach of this Policy

Breaches of this policy can result in remedial, corrective, or disciplinary actions up to and including termination of employment.

7. Help & Advice

For Help and Advice in relation to this policy please contact ECARX Compliance - Compliance.Global@ecarxgroup.com

8. Internal Controls

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

9. Related ECARX Group Policies

Document
ECARX Supplier Code of Conduct
ECARX Anti-Bribery Policy
ECARX Human Rights and Anti-Slavery Commitment Statement
ECARX SpeakUp Guideline

10. Document Owner

This document is owned by ECARX Group Compliance

11. Document History

Version	Approved Date	Effective Date	Change	Next Review Date
1.0	11 July 2023	30 November 2023	None - First Issue	11 July 2025
2.0	27 August 2025	27 August 2025	None - Second Issue	27 August 2027