

重庆长安汽车股份有限公司 全球反腐败反贿赂政策 Chongqing Changan Automobile Co., Ltd. Global Anti-Corruption and Anti-Bribery Policy

一、目的

I. Purpose

重庆长安汽车股份有限公司（以下简称“长安汽车”“公司”或“我们”）始终视诚信合规为经营发展准则，致力于营造公平廉洁的商业生态环境，持续为利益相关方创造价值。我们严格遵守业务所在国家及地区的关于反贿赂和反腐败等方面的法律法规，建立一套严谨健全的反贪腐、反贿赂监督管理机制，并通过反贪腐培训、违规举报机制及惩戒体系，与供应商、经销商、客户等商业合作伙伴共同营造阳光透明的商业环境，禁止任何形式的腐败及贿赂行为，确保全球业务合规且可持续发展。为系统性管理商业贿赂与腐败风险，规范礼品往来、政治及慈善捐赠、商业雇佣等行为，特制定本政策。

Chongqing Changan Automobile Co., Ltd. (hereinafter referred to as “Changan Automobile” “the Company” or “We”) consistently regards integrity and compliance as fundamental principles for business development, committed to fostering a fair and ethical business ecosystem and continuously creating value for stakeholders. We strictly adhere to the laws and regulations

concerning anti-bribery and anti-corruption in all countries and regions where we operate. We have established a rigorous and sound supervision mechanism for anti-corruption and anti-bribery, and through anti-corruption training, violation reporting mechanisms, and a disciplinary system, we collaborate with business partners such as suppliers, distributors, and clients to build a transparent and ethical business environment. We prohibit any form of corrupt or bribery practices to ensure the compliant and sustainable development of our global operations. To systematically prevent the risks of commercial bribery and corruption, and to regulate gift exchanges, political donations, charitable donations, and commercial employment, we hereby establish the “Global Anti-Corruption and Anti-Bribery Policy of Chongqing Changan Automobile Co., Ltd.” (hereinafter referred to as the “Policy”).

二、适用范围

II. Scope of Application

本政策适用于长安汽车及分子公司的所有员工，以及所有代表公司行为的人员。公司鼓励参股或合资公司、经销商、供应商等其他业务伙伴遵守本政策。

This Policy applies to all employees of Changan Automobile and its subsidiaries and branches, as well as all individuals acting on behalf of the Company. The Company encourages equity and joint ventures, dealers, suppliers, and other business partners to adhere to this Policy.

三、管理原则

III. Management Principles

1. **禁止一切形式的腐败。** 长安汽车所有员工以及所有代表公司行为人员，均应遵守所有适用的反腐败法律，在开展业务和提供服务的过程中，遵守廉洁从业相关规定，严格禁止任何形式的腐败行为。

1. Prohibition of All Forms of Corruption: All employees of Changan Automobile and all individuals acting on its behalf shall comply with all applicable anti-corruption laws, adhere to relevant regulations on integrity in business conduct during operations and service provision, and strictly prohibit any form of corrupt practices.

2. **禁止一切形式的贿赂。** 长安汽车所有员工以及所有代表公司行为的人员，禁止因不正当商业目的向任何组织或个人（包括但不限于代理或中介、顾问、经销商、供应商、客户、合作伙伴或公职人员）提供贿赂。

2. Prohibition of All Forms of Bribery: All employees of Changan Automobile and all individuals acting on its behalf are prohibited from offering bribes to any organization or individual (including but not limited to agents or intermediaries, consultants, distributors, suppliers, clients, partners, or officials) for improper business purposes.

3. **加强费用监督管理。** 本政策要求保存准确的账簿和记录，以公正地反映涉及公司资产的所有交易，并且所有交易均应得到适当授权。所有费用须是合理的，不得用于非正

当目的，且须遵守长安汽车相关政策与内部制度。

3. Strengthened Expense Supervision and Management:

This Policy requires the maintenance of accurate books and records that fairly reflect all transactions involving company assets, and all transactions shall be properly authorized. All expenses must be reasonable, not used for improper purposes, and must comply with relevant Changan Automobile policies and internal regulations.

4. **鼓励投诉与举报。**长安汽车鼓励所有员工和外部人员实名报告任何可能违反本政策的行为，并将严格保密报告人信息，严格禁止对报告人进行打击报复或给予不公正待遇。

4. Encouragement of Complaints and Reporting:

Changan Automobile encourages all employees and external parties to report, preferably by real name, any possible violations of this Policy. We will strictly maintain the confidentiality of the reporter's information and strictly prohibit any form of retaliation or unfair treatment against reporters.

四、主要业务场景的管理要求

IV. Management Requirements for Key Business Scenarios

1. **赠送礼品与提供招待。**长安汽车员工在业务活动中赠送礼品与提供招待应遵循以下基本要求：应符合业务所在国家或地区的法律法规和商业惯例，及已知的接受方单位合规要求；应有合理的商业目的；不得成为获取不正当利益的途径；不得以现金或现金等价物形式；不得提供涉及不道德

的招待；单次礼品价值和招待费用不得超过当地商业惯例；赠送礼品与提供招待的费用应按长安汽车费用报销制度进行报销，并确保提交的业务信息及报销资料的真实性。

1. Gifts and Hospitality: All employees of Changan Automobile shall comply with the following basic requirements when providing gifts or hospitality in the course of business activities. All gifts and business hospitality must comply with the laws and regulations, business practices of the country where the business is conducted, and the compliance requirements of the recipient. All gifts and business hospitality must have a reasonable business purpose. All gifts and business hospitality must not be used as an approach to obtain improper benefits. The provision of cash or cash equivalents is prohibited. No unethical entertainment shall be involved. The value of a single gift or hospitality expense must not exceed the local business practice standards. All expenses for gifts and hospitality shall be reimbursed according to Changan Automobile's expense reimbursement policy, ensuring the authenticity of the submitted business information and reimbursement documentation.

2. 差旅活动安排。长安汽车员工在向外部人员提供差旅时应遵循以下基本要求：向为外部人员提供差旅开支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；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；员工不得借向外部人员提供差旅之机获得私利。

2. Travel Arrangements: All employees of Changan Automobile shall comply with the following basic requirements when providing travel in the course of business activities. All employees must have a reasonable business purpose when providing travel arrangements to external personnel of Changan Automobile, which shall comply with business practices and the known compliance requirements of the recipient. No improper entertainment activities shall be provided to external personnel, including but not limited to illegal activities, unethical activities, or pornographic activities. All employees 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. All employees shall not obtain personal benefits by providing travel arrangements to external personnel.

3. 政治捐赠。在全球经营活动中，未经长安汽车董事会审批及授权，不得向任何政党或政府无偿提供资金、服务、财产、设施、债务免除或其他经济利益。政治捐赠不得以使长安汽车在行政、立法、管理或其他方面得到不当支持为目的。

3. Political Donations: In global operations, without the prior approval and authorization of Changan Automobile's Board of Directors, no funds, services, property, facilities, debt forgiveness, or other economic benefits shall be provided

gratuitously to any political party or government. Political donations shall not aim to obtain improper support for Changan Automobile in administrative, legislative, managerial, or other aspects.

4. **慈善捐款。**捐赠活动应遵循长安汽车相关管理规范，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、受中国政府认可的非营利组织及非政府组织，不得向个人、企业、政府单位及关联组织或政治相关实体提供捐赠；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公司内部审批程序，确保合理性及透明度。

4. Charitable Donations: All donation activities must comply with relevant Changan Automobile management specifications. It is strictly prohibited to seek commercial interests or conduct benefit exchanges in the name of charity. Donation recipients are limited to legally registered, Chinese government-recognized non-profit organizations and non-governmental institutions; donations shall not be provided to individuals, enterprises, government units and affiliated organizations, or politically-related entities. 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 the Company's internal approval procedures to ensure reasonableness and transparency.

5. **招聘与聘用。**长安汽车按照真实、必要、合理的岗位要求进行招聘和录用，严格遵守公司的合规要求及人力资源制度和流程，确保招聘和录用过程的公平性、一致性和透明度。禁止为谋求个人利益为相关方及其家属或与之关系密切的个人提供或承诺提供工作机会。

5. Recruitment and Employment: Changan Automobile conducts recruitment and hiring based on genuine, necessary, and reasonable job requirements, strictly adhering to the Company's compliance requirements, human resources systems, and processes to ensure fairness, consistency, and transparency in recruitment and hiring. It is prohibited to offer or promise job opportunities to related parties, their family members, or individuals closely associated with them for personal gain.

6. **不当支付。**长安汽车禁止直接或间接地向任何人提供、承诺、给予或授权任何贿赂或回扣；禁止索贿、受贿；禁止作为第三方在索贿、受贿方面的中间人。

6. Improper Payments: Changan Automobile prohibits directly or indirectly offering, promising, giving, or authorizing any bribe or kickback to any person. Changan Automobile prohibits soliciting or accepting bribes. Changan Automobile prohibits acting as an intermediary for third parties in soliciting or accepting bribes.

五、投诉举报管理

V. Complaint and Reporting Management

1. 投诉举报渠道

1. Channels for Complaints and Tip-offs

长安汽车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，公司鼓励外部人员报告任何可能违反本政策的行为。

电子邮件: caxf@changan.com.cn

电话: 023-67592020

信函地址: 重庆市江北区江北嘴金融城二号楼 T2-33 层
长安汽车全球廉洁从业办公室、ESG 工作部

All directors and employees of Changan Automobile have an obligation to prevent or report any violations of this Policy. The Company encourages external parties to report any potential violations of this Policy.

Email: caxf@changan.com.cn

Tel: +86-23-67592020

Mailing Address: Changan Automobile Global Integrity Office, Floor T2-33, Building 2, Jiangbeizui Financial City, Jiangbei District, Chongqing, China

Changan Automobile ESG Department, Floor T2-33, Building 2, Jiangbeizui Financial City, Jiangbei District, Chongqing, China

2. 投诉举报处理

长安汽车将根据投诉举报线索和相关管理流程，开展问题线索处置或调查核实工作，一旦发现存在违反本政策的行为，公司有权施加其认为适当的处罚，包括口头或书面警告、发谴责函、暂停或终止对违规者的雇佣关系、终止公司与第

三方违规者的协议，移交相关单位并由其追究法律责任。

Based on the clues from complaints and relevant management procedures, Changan Automobile will carry out problem disposition or investigation and verification in accordance with relevant management procedures. Once a violation of this Policy is confirmed, the Company has the right to impose penalties it deems appropriate, including oral or written warnings, issuance of condemnation letters, suspension or termination of employment for the violator, and termination of agreements with violating third parties, and reference the matter to relevant authorities for legal liability to be pursued.

3. 反贿赂和反腐败培训

3. Anti-Bribery and Anti-Corruption Training 长安汽车对全体员工进行商业道德教育，每年开展反贿赂与反腐败培训，培训对象覆盖公司董事、管理层、正式员工、外包员工以及供应商，确保员工及商业合作伙伴了解熟悉政策要求，提升合规意识和廉洁自律。

Changan Automobile provides business ethics education to all employees and conduct annual anti-bribery and anti-corruption training covering the Company's directors, managers, formal employees, outsourced staff, and suppliers, ensuring that employees and business partners understand the policy requirements and enhancing compliance awareness and self-discipline.

4. 商业道德审计

4. Business Ethics Audits

长安汽车内部审计部门每年执行的审计计划中，会适当地将合规与商业道德纳入审计范围，包括但不限于反贿赂和反腐败。在发现公司董事及员工违反本政策的情况下，亦会移交相关部门进行纪律处理，情节严重可能受到民事、行政及刑事处罚。

Changan Automobile's internal audit department effectively incorporates compliance and business ethics, encompassing anti-bribery and anti-corruption, into its annual audit plans. Cases involving violations of this Policy by the Company's directors and employees will be referred to the relevant departments for disciplinary action; severe cases may result in civil, administrative, and criminal penalties.

附则

Bylaws

长安汽车将适时检视和更新本政策内容，确保其遵循最新监管要求，并保留对本政策的解释权。

Changan Automobile reserves the right to review and update this Policy from time to time to ensure its alignment with the latest regulatory requirements.