

# **Global General Compliance Code of Great Wall Motor**

## **1. List Company Compliance**

### **1) Governance and Management of Company**

The company insists on governing according to laws and regulations, and improves the corporate governance structure that each performs its duties and responsibilities, operates by cooperation and checks and balances effectively. Directors, supervisors, and senior management personnel shall abide by laws, regulations, articles of association and rules of procedure.

### **2) Information Disclosure Compliance**

Being the list company, for various major events and transactions (purchasing or selling assets; foreign investment; providing financial assistance; providing guarantees; renting or leasing assets; entrusting or entrusting management of assets and businesses; giving or receiving assets; debt and debt restructuring ; Signing a license agreement; transferring or assigning research and development projects; other transactions identified by the exchange), once find information that meets the standards and scope of information disclosure, we shall promptly perform its reporting obligations and responsibilities.

### **3) Prohibition of Insider Trading**

Company's directors, supervisors, senior management personnel and related employees must not disclose the company's inside information, and it is strictly forbidden to use inside information to engage in illegal transactions and obtain illegal benefits.

In order to avoid insider trading, after being informed of unpublished information (significant events) that may involve securities issuance, trading, or other factors that have a significant impact on the price of securities, and the company did not publish such information in legal media, information acquisition personnel should be prohibited from buying and/or selling company securities or disclose the information or suggest others to buy and sell/or company securities in order to avoid insider trading.

### **4) Related Party Transaction Compliance**

Companies, directors, supervisors and senior management personnel shall strictly abide by laws, regulatory requirements and internal decision-making and approval procedures, and conduct related party transactions fairly.

## **2. Employment Conduct Compliance**

### **1) Maintenance of Good Working Atmosphere**

The company cares for employees, ensure the physical and mental health and life safety of employees. Employment discrimination on gender, ethnicity, race, religion, nationality, and region is strictly prohibited. company respects the personal privacy rights of employees, strictly abides by laws and regulations and company systems in obtaining, storing, using and disclosing personal information of employees, and takes appropriate measures to protect employee information.

### **2) Work with Loyalty, Legitimacy and Responsibility**

Employees should fulfill their obligations of loyalty to the company, do not have any behaviors to damage reputation and interests of the company, comply with company rules and regulations, labor discipline and professional ethics, complete work tasks on time with diligence and responsibility, and consciously accept management of the heads.

Employees must abide by norms of behavior of the company, respect the national customs and religious beliefs of others, avoid offending, insulting, and harassing the language and behavior to others, and do not spread rumors or other defamatory or discriminatory messages.

### **3) Avoiding Conflicts of Interests**

Employees should properly handle the relationship between personal interests and the interests of the company in accordance with company requirements to avoid conflicts of interest.

## **3. Asset Security and Financial Compliance**

### **1) Proper Use and Protection of Company Assets**

Employees should protect company assets, including but not limited to reputation, intellectual property, information, products, real estate, and other types of tangible and intangible assets, from company losses and misuses. Employees can only use company assets for the purpose of completing their work and conducting company business. No one may use and dispose of them without the company's authorization.

### **2) Financial Compliance**

Strictly comply with the tax laws and regulations of the country and region where the company is

located. Tax evasion and fraud is prohibited. Do not conceal, falsify or falsify related financial records, or fabricate, provide or disclose false financial reports.

#### **4. Product and Business Compliance**

##### **1) Product Quality Compliance**

The company will regarding steadily provide products and services that meet customer requirements and the requirements of applicable laws and regulations as the bottom line.

Through the effective application of the quality management system, the company keeps the quality of products and services in line with customer requirements and applicable laws and regulations to enhance customer satisfaction.

##### **2) Health, Environment Protection and Public Security**

Our company has always been adhering to the HSE (health, safety and environment) philosophy of safety first, environmental protection first, and physical and mental health first, and strictly abides by applicable laws, regulations, regulatory rules and standards on work safety, environmental protection, employee health and public safety.

##### **3) Business Partner**

The company adheres to the principle of equality, mutual benefit and win-win cooperation, and establishes cooperative relations with business partners who are compliant, honest and law-abiding. Strictly examine the qualification and credit of suppliers, service providers, contractors, customers and other partners, and refrain from any business dealings with organizations, institutions, companies or individuals that have broken their promises, violated the rules, violated laws and records.

##### **4) Anti-bribery and Anti-corruption**

The company adhere to anti-bribery and anti-corruption, it is forbidden to provide advantages to obtain and maintain business opportunities and benefits. It is also forbidden the employee to solicit, provide or accept direct or indirect bribes.

##### **5) Anti-trust and Anti-unfair Competition**

Monopoly is the act of obstructing trade, restricting or excluding fair and free competition. We should strictly abide by the applicable anti-monopoly laws and regulations, conduct healthy competition within the legal framework, and consciously avoid monopoly behaviors.

The Company prohibits unfair competition practices such as the use of logos that do not conform to facts and mislead buyers, the unfair use of trade secrets or brands of other companies, damage to the business reputation of competitors, sale of counterfeit goods and improper lottery sales.

#### 6) Consumer Protection

The company operates in accordance with the law, respects and protects the legitimate rights and interests of consumers, listens to consumer opinions and accepts consumer supervision.

#### 7) Compliance with Trade Controls

The company complies with the applicable export control economic sanction and customs laws and regulations of the country where it operates. Without approval, it is forbidden to export, re-export and transit of dual-use items within the territory including goods, software or technology, it also forbidden to conduct the transaction directly or indirectly with the sanctioned countries or parties.

#### 8) Protect Intellectual Property

Intellectual property such as invention patents, utility models, designs, copyrights (works), trademarks (trade names, brands), and domain names are the company's most competitive assets. We must actively turn the results created by research and development activities into intellectual property, and at the same time respect and avoid infringing the intellectual property of others.

#### 9) Data Security and Confidential

To ensure data security, the company should make overall plans for the development and construction of the company's data protection system, strengthen data security and information protection during the data application process, and avoid company information leakage. We must strictly abide by the confidentiality agreements signed with our partners. And the confidential information should be regulated and carefully managed.

#### 10) Anti-money Laundering and Anti-terrorist Financing

The company shall conduct business with partners with legal and reputable sources of funds, and avoid transactions with parties suspected of money laundering. Companies shall abide by the anti-money laundering laws, regulations and regulations of the People's Republic of China and the countries where they do business. The Company shall never participate in money laundering and shall not provide assistance or convenience for others.

#### 11) Compliance with International Trade and Investment

Companies and employees comply with international rules and laws and regulations of the country in which they operate, and respect the culture, religion and customs of the country in which they operate.

It is strictly prohibited for the company to carry out investment projects that are listed in the prohibited category of the negative list of the each government.

#### 12) Donation and Sponsorship

In order to fulfill its social responsibility, the company can donate money and materials to education, science, culture and art, and social welfare projects. Sponsorship is available for opportunities to promote the company's brand. Donations and sponsorships must be transparent and legal, and don't be donated or sponsored to outsiders for the purpose of protecting the company's improper interests or other unreasonable reasons.

### **5. Government and Committee Relationship**

The company lays great emphasis on mutual support and cooperation with the government (legislative, executive and judiciary included), and actively develops constructive strategic relationships with the government. The company attaches importance to taking into account the public interests of the local community in order to benefit the community from the company's business.