

Li Auto Inc.

Anti-Bribery and Anti-Corruption Compliance Policy

Li Auto Compliance Declaration

Li Auto Inc. (together with its branch offices, subsidiaries, and affiliated companies, “**Li Auto**”, “**We**” or the “**Company**”) adheres to honest business operations and business ethics and is committed to creating a fair and incorruptible business environment, continuously providing value to customers, shareholders, and other stakeholders. Li Auto adopts a “zero tolerance” attitude towards any form of bribery. Li Auto adheres to the anti-bribery laws and regulations of all countries and regions in the world, and eliminates any unfair competition behaviors or activities.

Li Auto has comprehensively updated its Code of Business Conduct and Ethics and Anti-Bribery and Anti-Corruption Compliance Policy based on the requirements of the anti-bribery management system standard ISO 37001. All employees of Li Auto and all business partners who are representing Li Auto or who have business relationships with Li Auto should be clearly aware of and strictly comply with applicable anti-bribery laws and regulations, the updated Code of Business Conduct and Ethics and Anti-Bribery and Anti-Corruption Compliance Policy, and the supporting anti-bribery compliance management system of the Company.

Li Auto takes the reporting of any dishonest behavior, such as corruption and bribery by its employees and business partners, seriously and continuously improves the effectiveness of the anti-bribery management system.

Compliance is the bottom line and prerequisite for the Company’s operations. All employees and business partners of Li Auto should strictly abide by compliance obligations while conducting daily business. The Company believes that only by consistently compliance requirements can the long-term success be achieved.

1. Purpose

This Anti-Bribery and Anti-Corruption Compliance Policy (the “**Policy**”) aims to clarify the anti-corruption and anti-bribery compliance principles of Li Auto, regulate the behavior of all employees in business activities, and comply with the anti-corruption and anti-bribery laws of the countries where its businesses are conducted, including but not limited to compliance with the Chinese Criminal Law, the Anti-Unfair Competition Law” and the U.S. Foreign Corrupt Practices Act (FCPA).

The compliance requirements mentioned in this Policy apply to anti-bribery and anti-corruption aspects, and all employees should also comply with other compliance requirements and obligations specified in the Li Auto Employee Handbook.

2. Applicable scope

This system applies to employees, interns, directors, supervisors (if applicable), and senior management personnel of Li Auto Inc., its branch offices, subsidiaries, and affiliated companies, as well as individuals who are assigned to work or serve for Li Auto or who work or serve on behalf of Li Auto, including labor service/consultants and third-party dispatch and outsourcing personnel. These personnel are collectively referred to as “employees” in the Policy. To avoid any ambiguity, this Policy does not constitute or indicate a labor relationship with relevant personnel.

Given the varying legal systems in various countries and regions, if there are any inconsistencies between this Policy and local laws and regulations, the more stringent requirements and local laws and regulations shall prevail. The Company will regularly review the guidelines and make corresponding revisions to adapt to changes in laws and regulations or company development.

3. Principles of anti-bribery and anti-corruption compliance Management

The Company is committed to adhering to the values of honesty, integrity, fairness, incorruptibility and the highest standard of business ethics in the process of conducting business, and resolutely abiding by the Company’s anti-bribery and anti-corruption system, and the anti-bribery and anti-corruption laws and regulations of any country or region where it operates or intends to conduct business, including Anti-Unfair Competition Law and Criminal Law of the People’s Republic of China and the FCPA of the United States.

The Company adopts a “zero tolerance” attitude towards any bribery and corruption, requiring:

- 1) Prohibition against providing, accepting, promising to provide, or soliciting bribes directly or indirectly to influential outsiders;
- 2) Unless based on existing legal or contractual obligations, prohibition against providing any gifts, hospitalities, or other benefits to influential outsiders during the business sensitive period.

4. Anti-bribery and anti-corruption compliance management system

The Company’s anti-bribery and anti-corruption compliance management system consists of the following main system documents and its supporting systems:

- 1) This Policy serves as a programmatic document for the Company’s anti-bribery and anti-corruption compliance management;
- 2) The Code of Business Conduct and Ethics applicable to the directors and all employees of the Company clarifies the value orientation of the Company’s lawful compliant operations, enhances the honesty and compliance awareness of all employees, clarifies the basic code of conduct for employee compliance, and provides guidance for the daily business management of all employees;

- 3) The supporting business scenario systems. The Company provides specific detailed requirements for each part of the compliance operation mechanism, including specific compliance principles, division of responsibilities, and actual control of key risks; and
- 4) All employees must read the rules and regulations of Li Auto and sign the receipt note of the policies when joining the Company. Before signing the commercial contract, the business partners must sign an Incorruptibility Agreement.

5. Compliance requirements for major business scenarios

5.1 Gift giving and hospitality

The Company strictly prohibits the following behaviors:

- 1) It is prohibited to give gifts for the purpose of obtaining improper benefits or other purposes of corruption;
- 2) It is prohibited to give cash or cash equivalents as gifts (such as gift cards, recharge card, shopping cards, fuel cards, phone cards, and other prepaid cards), excluding seasonal exchange certificates (such as moon cake coupons, rice dumpling coupons, and other exchange certificates used in local traditional festivals);
- 3) It is prohibited to give excessively expensive or luxurious gifts (such as all kinds of luxury goods, jewelry, high-priced cosmetics, high-priced tobacco and alcohol, and smart phones).
- 4) It is prohibited to provide hospitality involving immoral activities, even if they are considered legal locally;
- 5) It is prohibited to provide excessively expensive or luxurious hospitality (such as consumption in luxury or private clubs, and luxury cruises);
- 6) It is prohibited to give cash or equivalents to recipients as hospitality expenses;
- 7) It is prohibited to evade related compliance management process of the Company through any fraud.

5.2 Accommodate external business trip

The Company strictly prohibits the following behaviors:

- 1) It is prohibited to accommodate external business trip for non-commercial purposes, such as customized travel for customers;
- 2) It is prohibited to pay business trip expenses for unrelated personnel, such as family members or friends of the business traveler;

- 3) It is prohibited to provide excessive luxurious forms of travel, such as private planes, luxury cruise ships, and luxury yachts;
- 4) It is prohibited to provide inappropriate and illegal accommodations or accommodations that are not in line with business practices, such as gambling, adult entertainment, and illegal drugs;
- 5) It is prohibited to violate the business trip regulations of the recipient's employer;
- 6) It is prohibited to violate local laws and regulations of the destinations of business trips;
- 7) It is prohibited to pay for entertainment, tourism, and other expenses for influential outsiders;
- 8) It is prohibited to provide cash advances, paying daily allowances, or reimbursing expenses that lack valid receipts for influential outsiders;
- 9) Forge vouchers and documents, receipts and other certifying documents related to business trips, and correspondence related to business trips;
- 10) It is prohibited to provide external business trip content that is strictly prohibited as mentioned above through external third parties.

5.3 Recruitment and employment

The Company requires recruitment and employment based on real, necessary, and reasonable job requirements and strictly follows the Company's compliance requirements and human resources systems and processes, to ensure the fairness, uniformity, and transparency of the recruitment and employment process.

The Company strictly prohibits the following behaviors:

- 1) Providing or promising to provide job opportunities for influential outsiders, or their family members, or individuals who have close relationships with them in order to ask the influential outsiders to make business decisions that are beneficial to the Company or its employees; and
- 2) Recording false information in recruitment and employment related archival materials.

5.4 Charitable donations

The Company strictly prohibits the following behaviors:

- 1) It is prohibited to provide unreasonable or high risk of bribery materials (such as tobacco and alcohol, expensive electronic products, and luxury goods) for physical donations;
- 2) It is prohibited to choose a recipient of donation who is not legally established or has no corresponding qualifications;

- 3) It is prohibited to choose a recipient of donation who has a violation record or negative media information, and after further verification, who is considered not to have an effective compliance management system to control the bribery risk;
- 4) It is prohibited to provide political contributions (donations to any politician, party or political organization);
- 5) It is prohibited to provide donations improperly bundle commercial interests with the donation activities;
- 6) It is prohibited to provide donations, whose bills provided do not meet the requirements of local accounting laws, regulations and policies;
- 7) Donations prohibited by local laws and regulations.

5.5 Commercial sponsorship

The Company strictly prohibits the following behaviors:

- 1) It is prohibited to choose the beneficiary or recipient of the commercial sponsorship who is not legally established or has a record of violations of law or negative media information, and after verification, the beneficiary or recipient of the commercial sponsorship has not built effective compliance system to control related risks;
- 2) It is prohibited to choose individuals as beneficiaries or recipients of commercial sponsorship;
- 3) It is prohibited to choose government departments as beneficiaries or recipients of commercial sponsorship without a valid reason;
- 4) It is prohibited to provide commercial sponsorship to business partners in the business sensitive period without a valid reason;
- 5) It is prohibited to provide commercial sponsorship without signing sponsorship agreements;
- 6) It is prohibited to attach commercial conditions unrelated to the sponsorship in the sponsorship agreement, or to improperly bundle commercial interests with commercial sponsorship activities;
- 7) It is prohibited to change the agreed purpose of using the sponsored funds or goods for projects unrelated to the sponsorship;
- 8) It is prohibited to use sponsored funds to purchase items that do not conform to the nature of the commercial sponsorship activities and that pose a risk of bribery;
- 9) It is prohibited to provide commercial sponsorship with unreasonable prices;
- 10) It is prohibited to transfer funds to third parties in the name of sponsorship;

11) It is prohibited to provide commercial sponsorship that does not comply with local laws and regulations.

5.6 Business partner compliance management

The Company expects to work together with its business partners to create a fair, impartial, incorruptible and transparent business cooperation environment, and requires business partners to actively abide by relevant business ethics and incorruptibility rules. The Company also tends to engage in continuous cooperation with business partners who have a good reputation and operate with integrity.

Business partner compliance management should run through all stages such as screening and introduction, certification, signing contracts, performing contracts, withdrawing from contracts, and evaluations after the cooperation ends, forming a closed-loop management throughout the whole process. When compliance risk signals are identified at any stage, the business department should implement additional countermeasures to eliminate or reduce relevant compliance risks. For business partners who conduct business on behalf of the Company, such as dealers, distributors, and project agents (collectively referred to as “agents”), if employees have reason to suspect that a certain agent may engage in improper behavior, they should immediately report to the Company.

5.7 Investment and mergers and acquisitions

When conducting investment and M&A business, the Company needs to implement compliance controls before the investment, during the investment, and after the investment to avoid compliance risks that investment partners or M&A targets may bring to the Company.

When compliance risk signals of the investment enterprise or acquired enterprise are found in the pre-investment anti-bribery due diligence investigation, the M&A execution department should implement additional risk countermeasures to eliminate or reduce compliance risks. When negotiating and signing transaction documents with investment enterprises or acquired enterprises, it is necessary to ensure that the terms of the transaction documents require the directors, or important shareholders, or senior management personnel of the counterparty to comply with anti-bribery compliance requirements and relevant anti-bribery laws and regulations, and compliance clauses should be added into the transaction documents. The counterparty should be required to sign a compliance commitment letter when conditions permit. After the transaction is complete, the Company should conduct an anti-bribery risk assessment for the investment or the acquired enterprise as soon as possible.

5.8 Facilitating fees

Facilitating fees, also known as rule-bending fees, are informal payments provided to obtain or accelerate routine government actions (i.e. actions that government officials need to perform within

the scope of official duty, such as processing government documents like licenses and visas, and providing basic public supplies such as water and electricity).

The Company prohibits the payment of facilitating fees or rule-bending fees in any cash or non-cash forms, and also prohibits the payment of facilitating fees or rule-bending fees related to the Company's business through third parties.

5.9 Handling of special situations

The above sections in this chapter only list common scenarios and requirements for anti-bribery and anti-corruption. For scenarios that are not included above and involve influential outsiders, the persons concerned should promptly consult and report to their department's persons in charge and the Legal and Compliance Department.

6. Anti-bribery and anti-corruption compliance management operation mechanism

6.1 Policy tracking and analysis

The Company promptly tracks and interprets applicable laws and regulations, international treaties, regulatory provisions, industry standards, and business practices related to anti-bribery and anti-corruption. Identify the compliance obligations and bottom line requirements that all domestic and overseas business departments and employees of the Company should fulfill, and evaluate the impact of compliance policy changes on the Company, and propose targeted plans to fulfill compliance obligations.

6.2 Reporting and investigation

The Company encourages stakeholders such as employees, business partners, and users to report any known or potential misconduct that violates laws, regulations, ethical standards of the Company, and harms the interests of the Company (email: compliance@lixiang.com). After receiving a confirmed report case, the Company will promptly conduct relevant business verification, provide feedback to the whistleblowers and seek the opinions of the investigated object. After confirming the violation facts, the Company will seriously handle the corruption report case. At the same time, in order to protect the basic rights and interests of whistleblowers, the Company has established rules for the protection of whistleblowers, strictly protect the personal information and reporting content of whistleblowers according to law, and prohibit any form of retaliation.

6.3 Penalties

If employees violate the Company's Anti-Bribery and Anti-Corruption Compliance Policy and related compliance management systems, relevant responsible persons should be held accountable and punished according to the provisions of the Li Auto Employee Handbook, depending on the specific circumstances.

7. Conclusion

All employees shall read and understand this Policy and put it into practice, and it will help each of our members choose the right way to act and avoid bribery and corruption compliance risks. This Policy lists the main business scenarios and compliance requirements that we may face in our work. However, it cannot include all scenarios. If there are concerns or doubts about any potential bribery risks in any business behavior or decisions encountered in daily work, please promptly refer to specific compliance systems or consult the Legal and Compliance Department.