# **Kuaishou Technology Anti-Corruption Policy Statement**

Kuaishou Technology (hereinafter referred to as "**Kuaishou**" or "Company," together with its subsidiaries and consolidated affiliated entities, collectively referred to as "**the Group**") is committed to creating a culture of transparency, fairness, integrity, and honesty:

- 1. Kuaishou strictly prohibits employees from accepting bribes, seeking private gains, and requests not to offer gifts, cash, or hospitality to Kuaishou employees and related interested parties as part of relation building activities;
- 2. Kuaishou advocates for honest cooperation, and business partners should adhere to business ethics, avoiding any falsification of information;
- 3. Kuaishou rejects bribery, and business partners should follow the principles of fair market competition, refraining from any exchange of benefits with Kuaishou employees;
- 4. Should a business partner engage in fraud, bribery, or similar actions, Kuaishou reserves the right to immediately terminate the cooperation and pursue corresponding legal responsibilities;
- 5. Kuaishou supports genuine and credible reports from business partners regarding employee misconduct and ensures the protection of the reporters' rights and interests.

The Group has established the Anti-Corruption Policy Statement (hereinafter referred to as "this Policy Statement") to provide a general framework for avoiding improper conduct in the course of operations.

# 1. Scope

This Policy Statement applies to all employees of the Group (including part-time employees, those who have entered into labor contracts, interns, and others who have signed employment agreements, labor agreements, dispatch agreements, consulting contracts, etc.).

Kuaishou requires all business partners (including suppliers, service providers, subcontractors, distributors, agents, consultants, ecosystem partners, and others) to comply with all applicable anti-corruption laws and regulations and to follow this Policy Statement when providing services and fulfilling contractual obligations to Kuaishou, or on behalf of Kuaishou to customers or other third parties. Should any involvement in fraud or bribery occur, Kuaishou has the right to immediately terminate the cooperation and pursue corresponding legal responsibilities.

In the event of a conflict between this Policy Statement, other Kuaishou policies, or applicable laws and guidelines, the stricter provisions shall apply.

## 2. Definitions

"Bribery" refers to the offering, promising, giving, or demanding or accepting any "valuable item" in order to obtain or retain business opportunities or competitive advantages, or other improper benefits.

"Corruption" refers to the illegal or unethical conduct of seeking private economic benefits or other improper benefits by exploiting one's position or authority. Acts of corruption include, but are not limited to, bribery and acceptance of bribes.

"Valuable item" refers to tangible and intangible items with value or benefits, including but not limited to: cash or cash equivalents (e.g., prepaid cards such as gift cards), charitable/philanthropic donations, political donations and sponsorships, job opportunities, unjustified or baseless commissions, favorable contracts, gifts, entertainment, business opportunities, or stock options, free traffic, discounts, unfair preferences, loans, consulting fees, service fees, and services that would otherwise need to be paid for or purchased.

# 3. Prohibition of Any Form of Corruption

The following provisions outline the principles prohibiting corruption.

# 3.1 Prohibition of Bribery

No Kuaishou employee may provide, promise, grant, or approve any valuable item to a business partner or any other party to induce that party to assist Kuaishou in obtaining or retaining business improperly or to gain any undue advantage. This also applies regardless of whether the benefit is (or is expected to be) provided directly or indirectly through the use of a business partner or any other party.

This also applies to situations where Kuaishou employees induce business partners to violate their obligations to their employers (e.g., giving gifts to a business partner and asking them to ignore mandatory internal selection processes).

### 3.2 Prohibition of Accepting Bribes

No Kuaishou employee is entitled to demand or accept any valuable item, or the promise of such, from a business partner or any other party in exchange for performing or not performing their duties (e.g., providing unfair preferences in product procurement or any other business activities). This also applies regardless of whether the benefit is (or is expected to be) accepted directly or indirectly through the use of any business partner or for the benefit of any related person.

This also applies to situations where acceptance of bribes leads Kuaishou employees to violate their obligations to their employers (e.g., a Kuaishou procurement manager accepting gift cards from a supplier and, in return, ignoring internal selection processes).

#### 3.3 Relationships with Public Officials

The above provisions (3.1 and 3.2) also apply to public officials. Relationships with public officials are strictly regulated by applicable laws and regulations. Violations of the relevant laws and regulations can cause severe damage to Kuaishou and the related Kuaishou employees.

# 3.4 Gifts and Hospitality

Generally, it is prohibited to offer or accept expensive gifts or extravagant hospitality from anyone, such as high-end alcohol, first-class flights, or luxury accommodations.

Gifts or hospitality should meet the following conditions:

- (1) Legitimate purpose: They should be intended to establish and maintain good business relationships and not to obtain or retain business, gain undue advantages, influence normal business processes, or decision-making;
- (2) Appropriate timing: They should not be given during the bidding process or at important decision-making stages that may affect fair decision-making in sensitive

times;

- (3) Reasonable value: They should be in line with normal business practices and should not provide or accept gifts, cash, or cash equivalents, or other prohibited types of gifts beyond ordinary value;
- (4) Legal and compliant: The business of gifts and hospitality should be open and transparent, in compliance with applicable laws and regulations against corruption.

#### 3.5 Conflicts of Interest

Kuaishou employees must act in the best interests of the Company, avoiding relationships and situations that may negatively impact their ability to make objective decisions in the best interests of the Company. Conflicts of interest can negatively affect Kuaishou's business operations and may lead to corrupt practices. Therefore, Kuaishou employees must:

- (1) Strictly avoid situations where professional judgment may conflict with personal interests, such as working in companies of business partners where they or their relatives can exert commercial influence;
- (2) Disclose each potential conflict of interest to their superiors at Kuaishou;
- (3) Record such disclosures.

Specific requirements and disclosure procedures are detailed in the "Kuaishou Provisional Regulations on Avoiding Conflicts of Interest".

#### 3.6 Charity and Donations

- (1) Kuaishou insists on not solely pursuing the maximization of its own interests and focuses on its social responsibility;
- (2) Kuaishou prohibits using charity and donations as a cover for corrupt purposes, requiring effective measures to ensure the transparency and legality of charity and donation activities;
- (3) Kuaishou does not directly or indirectly participate in any political party activities, nor does it sponsor local national political parties, candidates, their affiliates, or any subordinate organizations.

# 3.7 Business Partner Management

Kuaishou is committed to operating with integrity according to the high standards of social responsibility and legal responsibility reflected in its employee handbook and Kuaishou's values. We expect each of our business partners to have a similar commitment to ethics, integrity, and corporate responsibility.

Kuaishou's business partners should:

- (1) Adhere to principles and standards consistent with those set forth in our employee handbook;
- (2) Comply with all applicable laws and regulations, including those detailed in this Policy Statement related to bribery and corruption;
- (3) Operate with integrity, including maintaining accurate books and records; and
- (4) Ensure that their own business partners also conduct business according to these principles.

Kuaishou considers proper due diligence, complete agreement terms, and corresponding control procedures to be essential means of ensuring that business partners comply with Kuaishou's anti-corruption policy. Kuaishou prohibits any acts of bribery through, assistance, inducement, or collusion with business partners. Kuaishou requires that business partners do not engage in any form of bribery and corruption on behalf of Kuaishou or in cooperation with Kuaishou, including offering improper gifts and hospitality to Kuaishou employees.

#### 4. Disclosure

Kuaishou shall make the necessary public disclosures as required by applicable laws and regulations.

## 5. Accounting and Record-Keeping Requirements

Kuaishou should maintain appropriate and detailed books and records that accurately and fairly reflect all transactions and dispositions of assets.

Each Kuaishou business line or department is responsible for designing and maintaining proper internal accounting control systems to ensure compliance with this Policy Statement. All actions authorized under this Policy Statement should be properly recorded in the books and records of the entities making payments or giving gifts.

No person working for or on behalf of Kuaishou shall make any false entries in Kuaishou's books and records, nor shall any such person create any false or misleading documents to conceal, assist, or falsely describe Kuaishou's financial expenditures. No unrecorded funds or secret assets are to be created or maintained.

# 6. Training and Communication

The Kuaishou Integrity and Compliance Department will conduct regular online or offline training for Company employees or its business partners on this Policy Statement and related systems as the situation requires. All departmental personnel and management receiving inquiries are required to provide timely and clear guidance and to keep the employee's consultation confidential.

# 7. Violation Reporting and Prohibition of Retaliation

The Employee Handbook stipulates that if Kuaishou employees become aware of, or reasonably believe that there is or will be a violation of this Policy Statement, regardless of whether the violator is a Kuaishou employee, business partner, or any other individual or entity, we encourage the aforementioned Kuaishou employees to immediately report the relevant information to their superiors or the Integrity and Compliance Department. They may also report violations through Kuaishou's reporting hotline (lianzheng@kuaishou.com) or the official reporting website: <a href="https://jubao.kuaishou.com/#/?channel=KSPC">https://jubao.kuaishou.com/#/?channel=KSPC</a>. We support both anonymous and real-name reporting methods.

Furthermore, Kuaishou employees who report in good faith will be protected and will not be subject to retaliation. In accordance with the "Kuaishou Integrity Reporting Management Standards," Kuaishou will not tolerate any retaliatory actions against employees who report potential or actual violations of this Policy Statement in good faith. Kuaishou will strictly keep the reporter's personal information and reporting materials confidential and strictly prohibits anyone from retaliating against reporters, witnesses, and investigators in any form.

# 8. Consequences of Violations

The Company has the right to discipline employees who are found, after investigation, to have violated this guideline, which includes immediate termination of the labor contract and legal proceedings.

#### Disclaimer:

Should there be any ambiguity or inconsistency between different language versions of this Policy Statement, the Chinese version shall prevail.