

CODE OF CONDUCT AND ETHICS

 **GWM** Hello, tomorrow.





“ Guided by Care, driven by
Compliance ”

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Message from the CEO

Commitment to Ethics to Build Tomorrow

Ethics must be the basis of everything we build. In a sector in constant transformation, where **innovation** and **sustainability** go hand in hand, our commitment to **integrity** is non-negotiable.

This Code reflects our culture and guides our internal and third-party relationships. It is an invitation for everyone to act **responsibly** and **transparently**. It is **essential that our leaders be role models**, encourage dialogue, identify risks and ensure corrective actions when necessary.

Our company is made up of people and that is why we count on each GWM employee to always reinforce the importance of an ethical environment, being an ambassador of compliance and our values.

Our **credibility** is the result of ethics and teamwork. When we collaborate, share knowledge and have the courage to act fairly, even in the face of challenges, we pave the way for a more solid future.

I invite everyone to learn about and practice GWM values, so that we can continue to lead with purpose and build tomorrow together. Thank you for your commitment, dedication and for everything you do for our GWM!

张庚申 **ANDY ZHANG** | Americas Chief Executive Officer

History of GWM

Great Wall Motors (GWM) was founded in 1984 and is considered the largest private automobile manufacturer in China. We are currently present in **60 countries** and have research and development centers in several locations, including Germany, Austria, the United States, Canada, Japan, India, South Korea and China. We began our activities in **Brazil** with the determination that has made our brand stand out everywhere we operate.

GWM Brazil believes in a better and possible future for everyone. Our vision is to build tomorrow every day, redesigning the relationship between people and cars. Our desire is to make things happen and transform the world together, anticipating a new era in the automotive industry. A future that we build today, with attitudes that challenge the status quo and ideas that break standards. It takes **boldness to transform**. Only pioneers, the tireless and the nonconformists are capable of anticipating tomorrow and making it a reality.



CODE OF CONDUCT AND ETHICS





The Code of Conduct and Ethics

This **Code of Conduct and Ethics** (“Code”) is the essential guide that governs the **standards of behavior** and practices of GWM Brasil. It establishes **clear guidelines** for relationships in the workplace, as well as in contact with employees, leaders, suppliers, customers, partners, dealers and other parties involved in the company’s operations. In addition, the Code serves as a fundamental reference for **decision-making**, reinforcing the commitment to integrity, respect and ethics in all our activities.

GWM Culture and Principles

MISSION

GSTM (Green, Smart, Tecnology, Mobility): Lead and revolutionize the transformation of the automotive industry, with technologies in sustainable mobility.

VISION

Building tomorrow everyday, with the constant improvement of our technologies, redesigning the relationship between people and cars.

VALUES

CHANGES

There is nothing permanent, except change! Challenge yourself to build something new, even better!

INNOVATION

Do something new: ahead of the future! Create a dynamic and open culture, with efficiency and respect in building a solid foundation to create a company focused on innovation.

SHARING

Together, we create value for our company, in a work environment where we share good practices, foster communication and alignment and, in this way, enable the construction of a win-win ecosystem for our employees and partners.

INTEGRITY

Self-discipline and responsibility with zero tolerance for corruption, bribery and any type of fraud or misconduct. Always seek operational compliance with laws, regulations and internal standards in building a sustainable future where physical and digital are one.

CREDIBILITY

Honor our values, people, customers, processes and internal controls guided by constant improvement in building tomorrow. Be committed to ethics to consolidate our brand. Remember: credibility is acting according to what you say.

Integrity

GWM Brazil believes that its success depends on a joint effort to promote **ethics** and compliance with **laws, rules and a focus on the consumer**.

We ask that all of our suppliers, service providers, dealers, third parties and business partners who maintain business relationships with us follow the guidelines of this Code, in addition to respecting the specific anti-corruption commitment standards. Compliance with these rules is an **indispensable requirement** for establishing and maintaining business relationships with GWM.

Sometimes, in our daily lives, we come across situations in which we are not sure how to act or position ourselves. When in doubt, ask yourself:

- 1 Does my attitude respect the applicable laws, rules, policies and company procedures?
- 2 Would I be proud to tell my children or family about my actions as an example of good conduct?
- 3 Should I consult other people or departments before taking action?
- 4 If this action were to become public, could it expose or harm me, my colleagues and/or our company?

It is everyone's duty to know and comply with the rules and policies applicable to the performance of their duties, to ensure a good work and business environment!

Ethics, integrity, responsibility and respect for each other and for **diversity** are among our most valuable pillars, which must always guide all the behavior of our employees in our daily operations!

On topics such as Anti-corruption, Prevention of Money Laundering and Financing of Terrorism, Data Protection and Privacy, Information Security, Antitrust, Conflict of Interest, Gifts, Hospitality, Entertainment, among others, in addition to the guidelines established in this Code, we have **specific policies** that offer more detailed and in-depth guidance.



This Code and its principles govern all other GWM policies.

If you have any questions about any GWM procedure or policy, first ask: your direct manager, HR or Compliance

Violation of the Code of Conduct and Ethics

Any employee or third party who fails to comply with the rules of this Code of Conduct and Ethics or other internal regulations of GWM will be subject to the application of **disciplinary measures** and **penalties provided for by law**, compromising the relationship of mutual trust and may face legal proceedings.

All violations will be assessed **immediately**, with **appropriate** and fair responses, in accordance with specific internal policies and in compliance with current legislation.



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Our Compliance Practice

Compliance at GWM ensures that the company, its employees, suppliers, third parties and dealers comply with applicable **laws, regulations, standards** and **ethical practices**. Through procedures and preventive measures, it works to avoid irregular practices and correct or mitigate identified problems.

In practice, Compliance aims to **raise people's awareness** and strengthen the culture of ethics and integrity in all our actions, attitudes and behaviors, maintaining a **healthy and collaborative** work environment.

Compliance is essential to protect GWM's **reputation**, acting to prevent and resolve situations that may generate regulatory fines, lawsuits, reputational damage or other negative impacts. It contributes to the reduction of **business risks** and promotes the continuous improvement of processes.

In addition, Compliance is a tool to communicate **leadership expectations** regarding the conduct of employees and third parties, aligning everyone with the fulfillment of GWM's mission.

If you witness a **misconduct**, have **suggestions, concerns** or **complaints**, seek out your leader, HR or Compliance, even if it is just a suspicion. Anonymous reports will be kept **confidential**, and **non-retaliation** is the basic rule of our channel with you!

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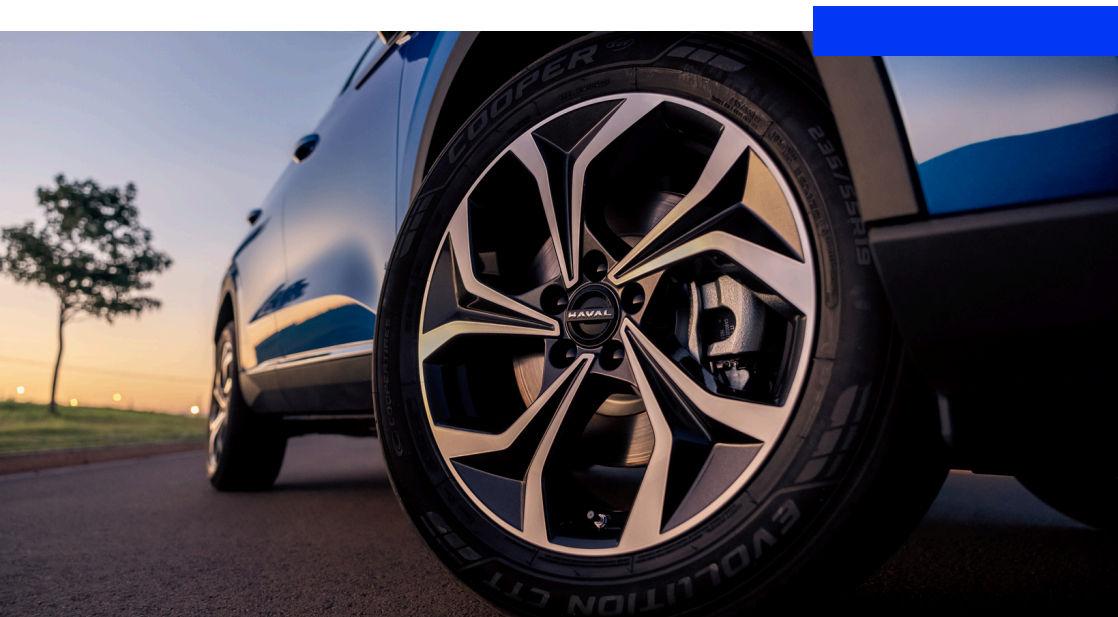
Risk Monitoring

This is the process of **identifying risks of losses**, real or potential, associated with the business, arising from internal or external factors, tangible or intangible, such as financial, operational, material or reputational losses.

The identification and monitoring of these risks depend on the commitment of all GWM leaders and managers.

The assessment of business risks focuses on prevention, through continuous measures and mechanisms of identification, monitoring and mitigation, seeking to eliminate or reduce impacts to the business.

At GWM, we are committed to effective risk monitoring, appropriate treatment and the implementation of action plans with agile and assertive responses.





Internal Controls

GWM's internal control system is comprised of a set of policies, procedures, tools and organizational structures that ensure an integrated process aimed at **identifying, assessing, mitigating and monitoring risks**.

All areas of GWM are responsible for managing the risks inherent to their projects and processes, contributing to increased operational efficiency, preventing failures and promoting **continuous improvement**.

The effectiveness of internal controls - reflected in our systems, platforms, procedures and policies - is essential to ensure that the company's activities are conducted in accordance with the principles of this Code and with applicable legal and regulatory standards.



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Responsibilities

Leaders

Leaders must act as concrete **examples** of ethical behavior, aligned with GWM's conduct guidelines. It is your responsibility to demonstrate integrity in **interactions with subordinates and third parties**, including suppliers, dealers and other business partners, promoting a culture of ethics and compliance in all relationships.

Employees

Employees are expected to follow the highest **ethical standards** in their daily activities, contributing to a work environment that favors compliance with this Code, as well as applicable policies, procedures, internal controls, laws, regulations and technical standards.



Business partners

We require that our business partners comply with and sign, in addition to this Code, the Anti-Corruption Declaration and Commitment, the Conflict of Interest Declaration and the Anti-Harassment Agreement, these signatures being **essential prerequisites** for the formalization of any contract with GWM.

Ethics Committee

The Ethics Committee, formed by representatives from different areas of GWM, is responsible for supporting GWM's **senior leadership** in promoting and consolidating a corporate culture guided by ethics and integrity.

The Committee plays a **strategic** role in analyzing specific cases, assisting in complex decision-making and ensuring that the company's actions are aligned with the principles established in this Code of Conduct and in the policies and procedures of the Compliance Program.

In addition, the Committee continuously monitors the effectiveness of the **Compliance Program**, identifying opportunities for improvement and implementing actions to reinforce compliance and transparency in all GWM operations.

Integrity is a commitment shared **by everyone**. Each person is a protagonist and co-responsible for building an ethical, solid and trustworthy company.

Corporate Resource Management and Security

Health, Safety and Work Environment

At GWM, one of our priorities is to preserve the **health and safety** of all employees, providing a healthy, safe and accident-free work environment, promoting **collective well-being**, including physical and mental health.

We believe that most accidents, occupational diseases and risk conditions can be prevented. Therefore, we prioritize compliance with **health and safety standards**, the guidelines of which are considered in all stages of planning and operation, strengthening a harmonious environment based on mutual trust. In addition, if you witness any situation that is not in accordance with safety regulations, immediately notify your immediate manager, the **Occupational Safety** team and, if necessary, HR, ensuring that corrective measures are taken quickly.

All employees are responsible for being aware of the risks inherent to their activities and for strictly following the guidelines provided by HR and the Occupational Safety area.

Working together, we can build a safer, healthier environment that is aligned with GWM's values of care and protection!

Intellectual Property, Innovation Rights and Trade Secrets

GWM holds international patents, strategic knowledge and high-performance technologies, protected by law and essential to the success of the business.

It is expressly **forbidden** for any employee to discuss or transmit information, topics or concepts related to the business without prior and formal authorization from the Board of Directors. Unauthorized sharing of confidential information may cause significant damage to GWM, in addition to entailing serious legal consequences for the employee, including labor, civil and criminal sanctions, and the liability of third parties involved.

Protecting confidential information is essential to ensure the **continuity and sustainable growth of the company**. Everyone must act responsibly and ensure strict compliance with these guidelines.

Protection of GWM Assets

It is the responsibility of all employees to look after GWM's **tangible** and **intangible** assets, protecting them against improper, inappropriate, illegal, harmful use, as well as against loss, theft or misappropriation. Examples of GWM assets: fleet vehicles, IT equipment, tools, customer portfolio, raw materials, furniture, among others.

Tangible assets are those that are material and physical, such as office and production materials, parts, computers, cell phones, vehicles, real estate and tools.

Intangible assets are non-physical resources of great economic value, such as GWM's brand and intellectual property, as well as confidential information, confidential data and software owned by the company.

GWM's assets must be used exclusively as work tools, and their use for personal purposes is prohibited.

All intellectual production generated by employees in the performance of their duties, or that uses GWM's resources, data, equipment, assets or facilities, is the exclusive property of the company.

Intellectual property includes inventions, innovations, literary and artistic works, symbols, names, images, drawings and models or formulas used in our business, regardless of registration.

Employees must inform their manager in writing of all ideas, discoveries, improvements or inventions made with GWM's resources or facilities. This ensures that these assets are protected and **recognized** as part of our company's intellectual property.

Access to GWM Premises

Everyone must comply with the conditions governing **access control** to GWM, to ensure the safety of people, facilities and equipment. Third parties and employees must only have access to authorized areas and strictly comply with established procedures, such as entry registration, accompanied circulation, use of identification and, when applicable, the use of **Personal Protective Equipment (PPE)**.

External visitors, especially third parties, must always be accompanied by at least one GWM employee. In the case of visits by **public officials**, it is mandatory to observe the internal procedure for interaction with public officials and agencies, including the presence of at least two GWM employees during the interaction and immediate reporting to the Compliance Department.



Internet, E-mail and Social Media

It is expressly forbidden to use any GWM devices or structures to commit immoral or illegal acts or acts that may compromise the **company's image**. The use of these tools must be restricted exclusively to activities related to work functions.

When using corporate structures, all employees must preserve the reputation and security of GWM, as well as that of their colleagues. It is not permitted to take pictures of the corporate environment, documents, products or any item containing confidential information or trade secrets, whether or not for the purpose of unauthorized disclosure in any media.

In addition, employees are not authorized to express unofficial opinions on behalf of GWM on social media. This responsibility is exclusive to the company's official spokesperson, ensuring that external communication is aligned with GWM's principles and strategy.

These measures are essential to protect the company's interests, maintain the confidentiality of operations and preserve the trust of all parties involved.

The conscious use of corporate resources is essential to protect GWM's **image, security** and **confidentiality**. Every action in the digital environment must reflect responsibility, ethics and respect for the company's guidelines.

Ethical Use of Artificial Intelligence Technologies

At GWM, we recognize the transformative potential of **Artificial Intelligence (AI)** technologies to optimize processes, improve decision-making and enhance the experience of our employees and partners. However, the use of these tools must be carried out in an ethical and responsible manner. It is essential to:

- Respect **data protection, privacy, confidentiality** and the rights of the people involved.
- **Do not** enter internal or confidential information into AI tools, preserving trade secrets and strategic data.
- **Do not** use AI to harm third parties, compromise data integrity, or generate discrimination or prejudice.
- Validate the information generated by AI, without making relevant decisions based solely on automated data.
- If an AI tool is used to generate, review, or support any activity, this use must be clearly and transparently stated.
- Follow all regulations and internal policies applicable to the use of these technologies.

Employees must act with transparency and **critical thinking** when interacting with AI tools, using them as support, and not as a substitute, for informed human judgment. Any inappropriate use or suspected misapplication of AI technologies must be reported to Compliance and will be subject to disciplinary measures.



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Ethics and Conduct in the Workplace

At GWM, we value our employees performing their activities in a **harmonious, healthy** and **respectful** work environment! We do not tolerate disrespectful behavior of any kind, as it compromises employee performance and can create a hostile and offensive work environment.

Examples of **unacceptable behavior** include disrespectful treatment, use of inappropriate language, offensive gestures, bad jokes, inappropriate physical contact, as well as any form of discrimination or harassment.

GWM repudiates any conduct that undermines the creation of a **positive work environment**. Employees who feel discriminated against or harassed, or who witness attitudes contrary to these principles, must immediately notify their direct superior or report the incident through the Ethics Channel.

GWM **repudiates any form of harassment**. It is the responsibility of each employee to formally notify their immediate superior or use the Ethics Channel whenever they identify or witness any situation of harassment. Violations of the rules of ethics and conduct in the workplace will be subject to investigation and the application of **disciplinary measures**.

Combating Moral and Sexual Harassment and all forms of discrimination

Harassment consists of a set of deliberate and persistent attitudes and behaviors that cause a **psychological impact** on the target person. It can manifest itself in a moral or sexual manner, both of which are strictly prohibited by this Code:

Moral harassment: repeatedly exposing someone to humiliating or embarrassing situations in the workplace, such as insults, professional devaluation, or imposition of tasks with the aim of harming or destabilizing the employee. Examples of **Moral Harassment** include, but are not limited to:

- Humiliating or ridiculing someone in public or private, such as making offensive criticisms or derogatory comments.
 - Delegating impossible tasks or demanding unattainable results, with the aim of destabilizing or frustrating the employee.
 - Intentionally ignoring or isolating an employee, excluding them from meetings, relevant discussions or important decisions.
 - Spreading malicious rumors or false information about an employee to compromise their reputation.
 - Removing important responsibilities or overloading them with irrelevant activities.
 - Constantly threatening to fire them without valid justification, creating an environment of fear and insecurity.
 - Constantly interrupting or not allowing the employee to express themselves in meetings or dialogues.
-

Sexual harassment: a crime provided for in the Brazilian Penal Code. It is the act of constraining someone once in order to obtain sexual advantage or favor, using relationships of power, influence or ascendancy inherent to the exercise of employment, position or function. Examples of Sexual Harassment include, but are not limited to:

- Explicit or veiled insinuations of a sexual nature.
- Gestures or words, written or spoken, with double meanings that constrain another person.
- Unwanted, impertinent and offensive conversations with sexual content. Telling jokes or using inappropriate expressions of a sexual nature that offend the dignity of others.
- Unreasonable physical contact with sexual connotations.
- Impertinent invitations to meet or interact in person.

GWM repudiates any form of harassment, reinforcing its commitment to a safe, respectful and ethical work environment. All employees must be aware of these types of behaviors, and any situation that resembles the one described must be promptly reported to their immediate superior or to the Ethics Channel. We maintain confidentiality and guarantee that there will be no retaliation against anyone who reports incidents in good faith.

If you witness or suffer any form of harassment, immediately contact Compliance through the **Ethics Channel**, which is a safe and confidential means for you to report it. It is everyone's duty to prevent and combat all forms of harassment and discrimination.

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GWM

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Hello,
tomorrow.

Diversity

GWM values and supports **diversity**, believing that it is essential to achieve its mission in an efficient, creative and collaborative manner. Therefore, **GWM does not tolerate any type of discrimination**, whether based on ethnicity, gender, sexual orientation, religion, age, marital status, nationality, political opinion, social status, physical characteristics or any other reason. Respecting differences is a fundamental principle in all our actions and relationships.



Conflict of Interest

A conflict of interest occurs when an employee, due to personal interests, may be **influenced** to act against the principles or interests of the company, making **inappropriate decisions** or failing to fulfill their professional responsibilities.

Examples of conflict of interest include unfairly favoring a person or company, seeking **undue advantages** or neglecting the interests of GWM, practices that are prohibited.

To avoid problems, situations of potential conflict of interest must be identified and avoided, even before they occur. These situations may arise, for example, due to:

- **Relationships** in the company's hierarchy or involving clients, suppliers, business partners, third parties or public agents;
- Working in a **second job** that compromises impartiality or work performance;
- Using working hours, assets or company information for **personal benefit**.
- **Favoring** a company linked to a family member, friend or former GWM employee, even without proof of technical capacity compatible with the order.

How to act: Conflict of interest situations must be reported to Compliance. Inform your superior immediately when you identify a potential conflict. If in doubt, consult HR or Compliance.

Workplace Relationships

At GWM, we value a harmonious, respectful and collaborative work environment that promotes inclusion, well-being and productivity for all. **Healthy** workplace **relationships** are essential to strengthen trust and cooperation among employees, in addition to reflecting the company's ethical values.

As for emotional relationships between employees, GWM understands that such bonds may occur, but requires that they be conducted in a **transparent** and **responsible manner**. It is essential that these relationships:

- **Do not** interfere with impartiality, productivity or professional performance.
- **Do not** generate conflicts of interest, especially in situations of direct or indirect hierarchy.
- **Do not** negatively impact the work environment or the perception of other employees.

If an emotional relationship may generate doubts or potential **conflicts of interest**, it is the responsibility of those involved to communicate the fact to management, Compliance or HR to ensure that appropriate measures are taken, always preserving confidentiality.



Use of Alcohol, Drugs and Carrying of Weapons

During working hours, it is strictly forbidden to consume **alcohol or drugs**, as well as to perform activities under their influence, in order to guarantee the safety and **well-being** of everyone.

In addition, **carrying weapons** on GWM premises is permitted exclusively to professionals who have express legal authorization, directly linked to their functions. These measures reflect our commitment to **integrity and safety** in the workplace.

Slave or Child Labor

Forced, slave or coerced labor due to debt is **absolutely unacceptable** and contrary to GWM principles. This Code prohibits any form of harsh or inhumane treatment, including corporal punishment, threats of violence, compulsory or unpaid labor, and situations of involuntary confinement.

In addition, GWM takes a firm stance against any practice that violates the conventions of the **International Labor Organization (ILO)** and the principles established in the Human Rights conventions of the **United Nations (UN)**. These guidelines are fundamental to guaranteeing the dignity, freedom, and respect for the fundamental rights of all people.

Child labor is that performed by children and adolescents under the minimum age permitted by law, detrimental to their physical and mental development. GWM abhors any practice that deprives children of their childhood, their potential, and their dignity.

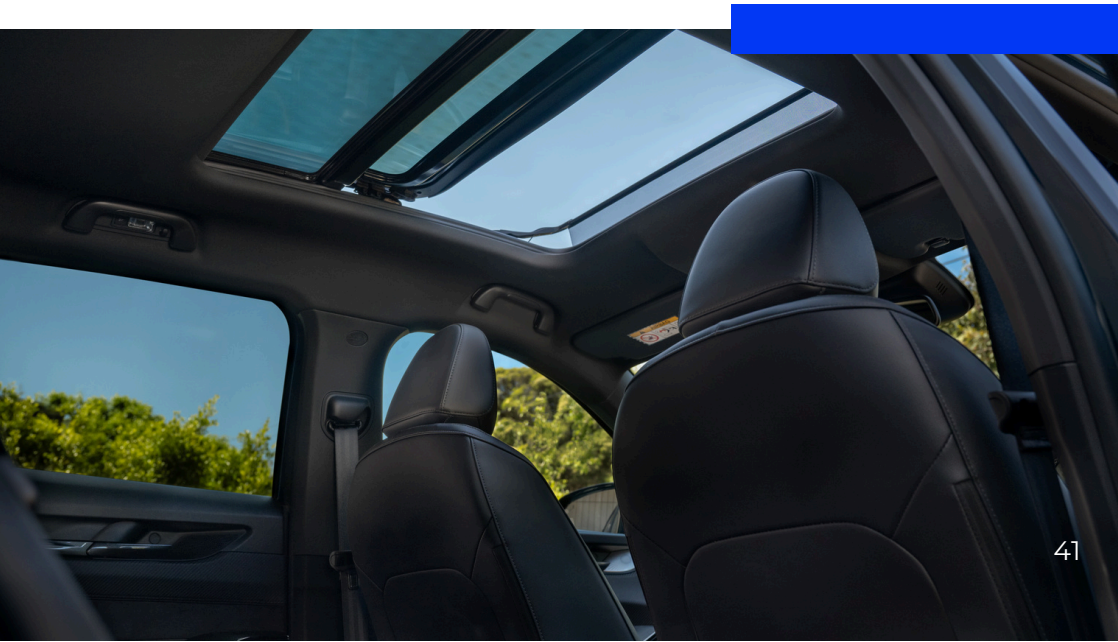
Any supplier, third party, or business partner proven to be involved in slave, forced, or child labor practices, or that hires subcontractors who promote them, will be immediately removed from GWM's list of preferred or approved suppliers or partners.

Political Opinion

The political positions or beliefs of GWM employees represent their **personal opinions** and do not, under any circumstances, reflect the official position of the company. If an employee chooses to express his political views, it is essential that he does so on a strictly **individual** basis, without associating the name, image or reputation of GWM, his colleagues or related third parties, such as suppliers and dealers.

It is expressly forbidden to carry out political propaganda in the **corporate environment** or to use the company's tools, resources or channels for this purpose.

This conduct is **essential** to preserve GWM's institutional neutrality and respect for different perspectives within and outside the corporate environment.



Gifts, Presents and Hospitality

Whenever possible, gifts, presents or hospitality should be **refused**. Whenever it is not possible to refuse them, it is mandatory to **report receipt** to the Compliance Department for **registration and approval**. The decision on how to handle the item will follow the authority and guidelines set forth in a specific policy.

It is strictly forbidden for any GWM employee to use their position to demand, accept, seek to obtain or promise undue advantages.

In addition, specific laws and rules apply to interactions with public entities, civil servants or public agents, especially GWM's Anti-Corruption policies. Any interaction outside the regular business routine must be reported and conducted in accordance with the current **Procedure for Interaction with Public Authorities**.



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Legislation

Anti-Bribery and Anti-Corruption

GWM maintains an ethical stance and is **committed to combating corruption and bribery**, strictly complying with applicable laws and regulations. It is expressly forbidden to offer, promise, pay or receive bribes or any other undue advantage in the performance of activities related to our company. GWM also does not establish, maintain or support business relationships with partners, suppliers, resellers or third parties that are involved in corrupt or illegal practices.

If an employee knows or suspects any involvement of service providers, resellers, business partners or third parties in corrupt practices, bribery or undue payments, he must **immediately** notify Compliance and Legal so that the appropriate measures can be taken.

In cases involving **authorities**, Compliance is required to monitor activities and ensure compliance in all interactions. Everyone is required to cooperate fully with investigations and to adopt a stance of transparency and integrity.

GWM reaffirms its commitment to **integrity, transparency and compliance** with anti-corruption standards, acting to promote an ethical and responsible business environment.

Money Laundering and Financing of Terrorism

GWM monitors its sales and maintains business partnerships exclusively with organizations that have **legitimate and reputable sources of funds**, strictly prohibiting any transactions with parties suspected of involvement in money laundering or terrorist financing. The company fully complies with anti-money laundering and terrorist financing laws and regulations in all regions where it operates and never participates or contributes, directly or indirectly, to such practices.

Therefore, it is strictly prohibited to promote or engage in any activity that could be characterized as money laundering or terrorist financing, reaffirming GWM's commitment to **integrity** and compliance in all its operations.

Fraud Prevention

GWM values **transparency, integrity and good faith** in conducting its business, and does not tolerate any form of fraud or misappropriation, whether in the production process, in the quality and safety of its products, in meeting targets or in financial, tax and accounting management.

This stance extends to all suppliers, third parties and partners of GWM, who are required to strictly comply with all applicable laws and regulations, including, but not limited to, **anti-corruption, anti-money laundering and anti-terrorist financing and data protection** standards.

GWM also adopts rigorous practices to ensure that accounting documents and records generated by the company or under its responsibility are complete, accurate and honestly reflect each transaction or expense. These records must be prepared in a timely manner and in compliance with applicable accounting rules and standards, ensuring the integrity of information and transparency in all operations.

What is considered a fraudulent act (omission/fraud)?

A fraudulent act is one committed intentionally to deceive or distort information in order to obtain advantages that cause harm to someone, to hide irregularities or to unduly benefit other people and companies.

Antitrust and Defense of Free Competition

GWM conducts its operations in accordance with the principles of **free competition** and free enterprise, repudiating practices that harm or limit the market, such as the formation of cartels, dumping or other harmful actions, in line with the **Brazilian Antitrust Law**.

It is forbidden to discuss, provide or receive commercially sensitive information, such as prices, discounts, market division, sales strategies or customers, both in contacts with competitors and in association meetings. It is not permitted to adopt conduct that may restrict, distort or harm free competition.

Agreements or combined behaviors between competitors with the objective of restricting competition are strictly prohibited. Likewise, the abuse of a dominant position in the market, through practices such as those listed below, is inadmissible:

- Exchange of competitively sensitive information;
- Differentiated treatment of customers without technical justification; Refusal to supply without legitimate reason;
- Application of inadequate prices or commercial conditions;
- Bundled sale of products or services without technical justification.

Participation in trade associations or chambers of commerce must be carried out in compliance with competition rules, avoiding the exchange of sensitive information. Whenever there is any doubt, the Legal and Compliance Department should be consulted.

Government Relations and Public Institutions

Government relations are the set of **relationship strategies** undertaken by individuals or legal entities, social or economic groups, on their own behalf or on behalf of third parties, with the aim of helping public authorities make better decisions for the benefit of society.

At GWM, relations and interactions with the Executive and Legislative branches are conducted exclusively by the **Department of External Government Relations (EGA)**. The purpose of these interactions is to defend the company's legitimate interests, always aligned with its sector of activity, and to promote concrete benefits for society.

GWM supports and collaborates with governments in various countries, cultivating relationships based on friendship, cooperation and mutual respect. The company values the public interests of the local communities where it operates, integrating them into its operations to promote positive impacts and contribute to sustainable development. Governmental relations must be **transparent and always documented**, in accordance with ethics, integrity and other guidelines of this Code, internal Policies and current legislation. These interactions reflect GWM's commitment to ethics, transparency and collective benefit.

GWM's **confidential information** is its exclusive property and is protected by law. It is **strictly forbidden** for employees to use, disclose or share, by any means, confidential company information with third parties, including individuals, companies, institutions or entities, without prior and formal authorization from the Board of Directors.



Information Security

Confidential information includes all **relevant and strategic data** related to GWM, such as industrial and commercial secrets, operations, business processes and any other sensitive company information.

The obligation to maintain confidentiality regarding confidential information obtained during the employment contract remains valid **even after termination**. This information cannot be disclosed or shared under any circumstances, regardless of whether the employment relationship is active or terminated.

Documents related to **legal actions or administrative proceedings**, whether physical or digital, are also considered confidential and must not be shared. If any confidential document is sent improperly, the recipient must immediately inform the Legal Department and the Compliance and Data Privacy Department for guidance.

The use of IT resources must be carried out exclusively with **licensed software**. The use of software or systems in an illegal, inappropriate or abusive manner is strictly prohibited and is subject to monitoring and application of disciplinary sanctions.

GWM employees are prohibited from using the company's information systems or equipment in an illegal, unethical, unauthorized or inappropriate manner. If you receive **inappropriate or suspicious messages**, please inform the IT Department immediately.

Personal Data Protection

GWM is committed to ensuring the responsible processing of personal data, respecting the **General Data Protection Law (GDPL)** and other applicable international standards. To this end, we have implemented the **Data Protection Governance Program**, which includes policies, procedures, tools and internal controls, ensuring alignment with legislation and ethical standards.

Employees who have access to or process personal data receive regular training and are instructed to strictly follow the established guidelines. When **third parties** are involved in the processing of personal data, GWM includes specific contractual clauses and carries out due diligence to ensure that the same level of security and compliance is maintained.

GWM also provides a channel for holders of personal data, committing to respond to all requests within the legal deadline. For questions, incidents or requests, please contact us by email at **dpo@gwmmotors.com.br**.

These practices reaffirm our commitment to protecting the personal data of employees, customers, suppliers and business partners, ensuring **privacy, security and compliance**.

Privacy Guidelines and Good Practices

All employees must handle personal data responsibly and strictly follow the guidelines of the Compliance and Data Protection Department. Before starting any activity involving the **processing of personal data**, it is necessary to seek guidance to ensure that the process is conducted appropriately and in compliance with applicable standards.

To clarify doubts, report incidents or obtain support, employees can contact us directly by email at **dpo@gwmmotors.com.br**.

In addition, GWM has **Privacy Policies** that reflect our commitment to ethical practices aligned with global standards, promoting an environment of respect, security and integrity in all operations.



Customs and Foreign Trade Controls

Foreign Trade encompasses the delivery of products, services, technologies or information to a counterparty located in another country. This activity requires strict compliance with applicable standards, ensuring compliance with **customs and foreign trade laws**.

Employees involved in Foreign Trade activities must understand all aspects of the transactions, identify the need for specific licenses and ensure compliance with applicable legal rules and obligations. It is essential that **exports and imports** are only carried out after obtaining all necessary licenses and permits, in addition to ensuring that all involved parties fully understand the existing requirements.

In addition to fully complying with current legislation, Foreign Trade activities must observe and respect the guidelines established in this Code, ensuring integrity and compliance in all GWM international operations.

Contacts with the Press or Media

Any interaction with the media, whether through magazines, published articles, social networks or the press in general, must be conducted with the support and guidance of the team responsible for GWM's **communications**, the Public Relations area.

If an employee is contacted by any media outlet, it is essential that they immediately inform the leadership of the responsible area, to ensure that the information is handled appropriately and in line with our company's **strategy and values**.

This guideline reinforces GWM's commitment to transparency, the accuracy of the information disclosed and the protection of its institutional image.



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Relationships with Third Parties

GWM establishes its business relationships with suppliers and partners based on the following values: ethics, integrity, impartiality and transparency, using objective criteria such as technical capacity, economic viability, legal compliance and ethical behavior.

It is essential that **suppliers, third parties and partners** understand and have their practices aligned with GWM's principles and values. Their activities must be monitored to ensure compliance with the aforementioned values and other guidelines of this code. Under no circumstances may partners be used to carry out illicit activities or activities that are contrary to the guidelines of this Code.

In addition, it is essential that suppliers and business partners promote integrity within their own supply chains, ensuring that the same ethical values are disseminated and applied.

GWM expressly **prohibits** any form of favoritism or discrimination in the selection of suppliers and partners, as well as during the term of contracts. These practices reinforce our commitment to a fair, ethical business environment aligned with best market practices.

GWM requires all suppliers, third parties and business partners to sign and comply with the **Anti-Corruption Commitment Statement** before any contract is formalized, reinforcing our commitment to ethics and compliance.

Likewise, all GWM employees must sign the **Anti-Corruption Policy Commitment Statement**, ensuring alignment with internal guidelines and applicable laws. These measures ensure that everyone involved in GWM operations shares the same **commitment to integrity**.

GWM employees, third parties, agents, partners and resellers are prohibited from offering, accepting or engaging in bribery, improper payments or illegal activities, whether with **public or private** parties, and are equally responsible if they witness such practices and fail to do so.



Our Customers

At GWM, customers are at the center of our actions. We value relationships based on transparency, respect and integrity. All employees and partners must act ethically and ensure clear, attentive communication and commitment to excellence in service.

We deliver products and services that reflect our commitment to quality, innovation and sustainability, always prioritizing customer safety and satisfaction. As an autotech, we constantly seek to exceed expectations with reliable and technological solutions, aligned with the best market practices.

The protection of privacy and the responsible treatment of personal data are also fundamental commitments, always in accordance with current legislation.

Dealers

GWM values a respectful and transparent relationship with its dealers, guided by honesty, ethical conduct and mutual collaboration. Building solid partnerships, based on trust and respect, is essential for success and joint growth.

It is essential that dealers adopt ethical and responsible practices in their commercial, social, environmental and labor routines, reflecting GWM's principles and values in all interactions with their employees, customers and partners.

In addition, each dealership represents an extension of our brand. All marketing, communication and relationship actions must reinforce our identity and purpose, following GWM's guidelines and promoting a consistent experience aligned with our standards of excellence.



Suppliers

GWM maintains relationships with its suppliers based on ethics, transparency and responsibility. The selection of suppliers must be carried out in a fair, technical and impartial manner, considering criteria such as quality, sustainability, legal compliance and integrity.

We expect our suppliers to respect human rights, adopt fair labor practices, act with environmental responsibility and comply with all applicable laws and regulations.

Any practice that involves conflict of interest, undue favoritism or violation of ethical standards is strictly prohibited. We work in partnership to promote an integral value chain.

Government and Public Institutions

GWM's relationship with the government must be conducted with complete integrity, respect for the law and transparency. Any form of bribery, facilitation payments or undue advantage to influence the actions or decisions of public officials is prohibited.

All interactions must be guided by ethical behavior, respecting current legislation, especially the Anti-Corruption Law, following the principles of good faith and institutional loyalty.

In regulatory processes, bidding processes, obtaining licenses or any other type of contact with the public sector, it is essential to act responsibly and consult the Legal and Compliance Department whenever necessary.

Unions

GWM recognizes the right of its employees to **free association**, as provided for in current legislation. All interactions and negotiations with union representatives on behalf of GWM are the exclusive responsibility of the Human Resources Department in conjunction with the Legal Department. The relationship with unions must be guided by respectful, transparent and constructive dialogue.

The company values negotiation environments based on mutual respect and the preservation of labor rights.

Associations

The participation of GWM employees and representatives in trade associations, chambers of commerce or similar entities must always respect ethical principles and competition defense standards.

The exchange of sensitive information, such as prices, commercial conditions, market division or competitive strategies, as well as any practice that may constitute a violation of free competition, is prohibited.

Activities in associations must have as their legitimate objective the promotion of sector development, the exchange of good practices and the strengthening of GWM's reputation.

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Environment, Social, Governance

Internal Commitment to ESG

At GWM, we believe that each employee plays an essential role in advancing initiatives related to **ESG (Environment, Social and Governance)**. Our commitment begins within the company, where individual and collective attitudes contribute to an ethical, sustainable and inclusive work environment, and help build a more responsible future.

- **Environment (E):** Employees are encouraged to adopt sustainable practices in their daily lives, such as reducing the consumption of natural resources, recycling and seeking alternatives that minimize environmental impacts.
- **Social (S):** We respect human rights, promote an inclusive work environment, free from discrimination and encourage active participation in community initiatives.
- **Governance (G):** Each employee is responsible for following internal standards, strengthening the culture of integrity and acting with transparency and responsibility, aligning their actions with GWM's values.

GWM values the contribution of each employee in its ESG journey, recognizing that individual and collective attitudes are essential to achieve a more sustainable and responsible future.

Sustainable Conduct

GWM is committed to generating a positive impact on society and the environment through sustainable practices and technological innovation. Our commitment to **ESG (Environmental, Social, Governance)** principles is aligned with the ongoing search for solutions that promote environmental preservation and sustainable mobility. In this sense, our actions are guided by:



Recognizing the environment as an **essential element** of GWM's business.



Developing and supplying **environmentally friendly vehicles**, focused on reducing greenhouse gas emissions.



Taking care to **reduce environmental impact**, preserve natural resources and energy for sustainable use in all stages of the life cycle of products produced by GWM, from design to production, including sales, use, reverse logistics and appropriate disposal.



Acting in compliance with all national and international environmental rules and agreements applicable to the business, with a commitment to continuous improvement, a little better every day.



All of our actions are guided by strategies that aim at **long-term sustainability** and the creation of value for society.



Act **collaboratively** with the communities where we operate, contributing to social progress and generating employment and income opportunities.

Social Responsibility

GWM has Social Responsibility as one of its fundamental pillars, reflecting our commitment to **sustainable management** and the positive impact on the communities where we operate. Our goal is to **promote a balance** between economic development, environmental protection and social well-being, contributing to the construction of a more just and sustainable society.

All employees are encouraged to incorporate social, environmental and economic concerns into their daily actions, always considering the well-being of all parties involved, such as local communities, partners, suppliers and customers.

GWM values **inclusion, diversity and respect for human rights in the workplace** and in all its operations, in addition to contributing to environmental preservation through sustainable practices and investments in clean technologies.

By applying these principles, we reaffirm GWM's commitment to acting ethically, respectfully and responsibly, generating shared value for society and the environment.



Donations and Sponsorships

Donations and sponsorships made by GWM must be aligned with the commitment to **social responsibility**, in compliance with the legislation, internal policies and the Donations and Sponsorship Policy, ensuring that they do not constitute fraud, corruption or conflict of interest.

All donations and sponsorships must be formalized through **appropriate legal instruments** and conducted with full **transparency**. These contributions must be based on legitimate purposes, aligned with business principles, proportionate to the compensation offered and never used to obtain undue competitive advantages.

In the case of **sponsorships with tax incentives**, the participation of the Government Relations Department (EGA) is mandatory, as provided for in the applicable policy.

Furthermore, any contribution to events or organizations whose objectives are **incompatible with GWM's values** or that may compromise our company's reputation is prohibited.

It is expressly forbidden to make donations to **public entities or political parties**, either directly or through intermediates, on behalf of GWM.

Ethics Channel

We believe that a secure channel for reporting irregularities is essential to protect the company's reputation and ensure an ethical and respectful work environment. That is why we have made available the **GWM Ethics Channel**, an essential tool for ensuring integrity and compliance with the standards established in our Code, Internal Policies and applicable legislation.

Our Ethics Channel is available so that everyone can report any concerns related to unethical behavior, violations of the Code, Policies, Laws or other irregularities.

Your voice is essential for maintaining a healthy, respectful work environment aligned with our values.

It is everyone's responsibility to report any violation, suspected violation or inappropriate behavior. Failure to report improper behavior when discovered or observed may also be considered an infraction. Likewise, using the Ethics Channel with the intention of damaging another person's reputation for personal reasons will be treated as inappropriate conduct and subject to sanctions.

All employees must report unethical or potentially illegal conduct, with concrete information, and cooperate fully with the investigation, providing complete and honest information.

**Have a question or
want to report
something?**



0800-591-3457



gwmmotors.com.br/empresa/canal-de-etica



compliance@gwmmotors.com.br
dpo@gwmmotors.com.br



Anonymity, Confidentiality and Non-Retaliation

GWM ensures anonymity, confidentiality and protection against retaliation to all who report inappropriate conduct or collaborate with internal investigations.

Any type of **retaliation, punishment or harmful** act against people who communicate legitimate concerns, reports of violations of the law or the Code of Conduct and Ethics, or who cooperate in investigations conducted by the company is expressly prohibited.

This commitment reinforces GWM's culture of integrity and transparency, ensuring that everyone can report irregularities **safely**.

Disciplinary Measures

Violations of the Code of Conduct and Ethics, internal policies or legislation are subject to disciplinary measures, which vary according to the **severity** and **recurrence** of the infraction. These measures include: guidance, verbal warning, written warning, suspension of the employment contract without pay and dismissal.

Failure to comply with formal obligations, such as completing mandatory training, completing the Conflict of Interest Declaration and signing Compliance documents, may also result in disciplinary sanctions.

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Commitment to the Code of Conduct and Ethics

Employee Data

Name:

Company:

Position:

Department:

I declare, for all due purposes, that:

1. I have received, read and fully understood the Code of Conduct and Ethics ("Code") of Great Wall Motor Brazil Ltda. ("GWM");
2. I undertake to observe and comply with all provisions set forth in the aforementioned Code, maintaining ethical and honest conduct in the performance of my activities;
3. I acknowledge my responsibility regarding the confidentiality of all information obtained as a result of my work at GWM, and I also affirm that I have not disclosed such information to third parties;
4. I declare that I am not involved in any situation that constitutes non-compliance with current laws or may appear to be a conflict of interest in relation to GWM guidelines;
5. I undertake to immediately report to my manager, HR, Compliance or through the Ethics Channel any conduct that may violate the law, the GWM Code of Conduct and Ethics or any internal rules and policies of GWM.

Certificate of Compliance

I certify that the information I have provided in this document is true.

Date: / /

Signature:

Notes



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