

Anti-Harassment Policy

Introduction

This policy is committed to providing all employees with a safe, healthy and peaceful work environment free from any form of harassment, abuse or corporal punishment, as well as promoting cooperation and mutual respect among employees. The policy aims to eliminate discriminatory and harassing behaviors that undermine gender equality and damage personal dignity.

XPENG publicly pledges zero tolerance for sexual harassment behavior and does not tolerate any discrimination or sexual harassment in the workplace for any reason. It hopes that all employees will make positive contributions to this policy. If discriminatory or harassing behaviors are discovered, the harasser will be disciplined. Any obstruction of harassment incident resolution, retaliation against complainants, or false or malicious complaints will also be punished.

This policy is available in Chinese and English for readers' reference. In case of any inconsistency, the Chinese version shall prevail.

Definition

Harassment, as referred to in this policy, means unwelcome behaviors with sexual content, including language, expressions, actions, texts, images, videos, voice, website links or any other media, which violate the wishes of others and cause discomfort associated with sex. Such behaviors offend, coerce, or humiliate the parties involved, resulting in negative psychological feelings or hostility, and an unfriendly work environment, regardless of whether the perpetrator has harassing intentions or any other inappropriate motivations.

Scope

1. This policy applies to all employees of Xiaopeng Motors and its related companies in China.
2. Other personnel of the Company, including but not limited to labor dispatch personnel, consultant personnel, interns, part-time personnel, job seekers or other temporary personnel who have not signed a labor contract with the Company, and any personnel belonging to third-party units/institutions but providing technology or services to the Company, may refer to this policy.
3. This policy applies to all work-related behaviors and extended workplaces, including conferences, training, and business trips held outside the office.

Appeal Channels and Grievance Procedures

1. The Human Resources Department is responsible for organizing the implementation of this policy and for receiving and investigating complaints of harassment in the workplace. All centers, departments, and managers have a responsibility to prevent and stop workplace harassment.
2. Employees who encounter harassment behaviors in relevant places have the right to report complaints to their immediate supervisor or the Human Resources Department (HRBP or Employee Relations). Complaints can be oral or written. If the complaint is made orally, the recipient should record all details provided by the complainant. If it is a written complaint, it can be submitted through a designated mailbox for accepting reports.

3. The Human Resources Department shall establish an investigation team within three working days of receiving the complaint and conduct basic understanding and verification work within five working days.
 - (1) The members of the investigation team should have no relatives or interests with the parties involved in the case.
 - (2) From the date when the investigation group initiates the investigation, the accused person shall be temporarily suspended from work to cooperate with the investigation. Other departments and personnel involved shall also fully cooperate with the investigation group's work.
 - (3) The investigators should interview complainants, accused persons, and relevant witnesses or evidence providers. All people who accept interviews have the right to read the investigator's records and review their statements to ensure their accuracy.
4. The investigation team shall complete the investigation within ten working days from the date of initiation and submit an investigation report, as well as make processing suggestions to the employee's business management department, the Legal Department, and the Human Resources Department. The report includes: ① an explanation of the charges; ② the accused person's explanation; ③ a summary of information obtained from witnesses or evidence providers; ④ based on various facts and evidence, whether sexual harassment occurred; ⑤ handling opinions on the incident.
5. Application of the investigation results:
 - (1) If the reported complaint is proven and the accused person is involved in sexual harassment, the accused person shall be given a level 3 disciplinary punishment - termination of labor contract/dismissal according to the relevant regulations of the "Employee Code of Conduct;" if the accused person is involved in other violations of discipline, corresponding disciplinary actions shall be taken depending on the severity of the circumstances, according to the relevant regulations of the "Employee Code of Conduct."
 - (2) If the accused person's behavior is suspected of violating relevant laws and regulations, it shall be transferred to administrative and judicial authorities for processing.
 - (3) If the accused person's sexual harassment is not established, the investigation will be terminated.
 - (4) If, after investigation, behaviors such as slander, false accusation, perjury, intimidation, violence, or other infringements of the rights of others occur, level-3 disciplinary punishment, termination of labor contract/dismissal, shall be imposed according to the relevant regulations of the "Employee Code of Conduct."

Privacy and Confidentiality

1. The Company and all individuals involved in the harassment complaint process shall comply with relevant laws to protect personal information. During the entire process of reporting, complaints, investigation and handling, the investigation team shall pay attention to the protection of the individual's privacy rights, sign a special confidentiality agreement and carry out confidentiality work for relevant materials. All parties involved in sexual harassment complaints should respect the privacy of all other parties, assume confidentiality obligations, and limit discussions about sexual harassment complaints to those who need to know.
2. In case of losses caused by unauthorized disclosure of employee privacy or information, the Company has the right to pursue legal action against the divulging employee. At the same time,

the Company is entitled to impose disciplinary action on employees who fail to fulfill their confidentiality obligations in accordance with the "Employee Code of Conduct."

Other

1. The Company also opposes any other forms of discrimination and harassment, including but not limited to verbal, non-verbal, and physical harassment based on an individual's race, skin color, beliefs, gender, age, nationality, or physical disabilities. Complaints and reports related to such incidents will be handled in accordance with this policy.
2. The Company's Human Resources Department and Legal Department should solicit and reflect the opinions and suggestions of employees, provide legal consultation services for employees, and support and assist victims in seeking legal remedies.
3. The Company may arrange for affected employees to take leave and provide professional psychological counseling services through the Employee Assistance Program (EAP) for victims.