

# **Kuaishou Conflict of Interest Prohibition Framework Guidelines**

## 1. Preface

To prevent economic relationships or personal relationships that may cause conflicts with the duties of employees to maintain the best interests of the Company (defined below), and to promote integrity and clean governance, Kuaishou hereby promulgates the "Kuaishou Conflict of Interest Avoidance Framework Guidelines" (hereinafter referred to as "These Guidelines").

These Guidelines apply to all employees (including part-time employees, employees with labor contracts, interns, and other personnel who have signed employment agreements, labor agreements, dispatch agreements, consultant contracts, etc.).

## 2. General Principles

- (1) Employees must act in the best interests of the Company and avoid relationships and situations that may negatively impact their ability to make objective decisions in the best interests of the Company, including but not limited to:
  - a) Economic interests (including but not limited to cash, cash equivalents, gifts, entertainment, services, or business opportunities, etc.);
  - b) Family or personal relationships;
  - c) Employment or investment relationships with competitors, suppliers, customers, or third parties related to the Company's business (except for holding less than one percent (1%) of the circulating shares of publicly listed companies in the form of investment).
- (2) Some potential situations or relationships that may cause conflicts of interest can be allowed after fulfilling the declaration and approval procedures required in these Guidelines (strictly limited to separate approval by the Company).
- (3) The prohibition of conflict of interest policy is an important measure to ensure the loyalty of employees, enhance the cohesion of the Company, and ensure the realization of the Company's value. It is also one of the basic employee disciplines that employees should follow. The Company adopts a "zero-tolerance" attitude towards any violations of the conflict of interest policy. Employees who are investigated and verified to have violated these Guidelines (including but not limited to not fully or timely declaring actual or potential conflicts of interest or engaging in any activities that may cause conflicts of interest without prior approval) will be subject to disciplinary action, which may include termination of employment. For actions involving illegal or criminal behavior, the Company will legally transfer to judicial authorities to pursue legal responsibility.

### 3. Details

- (1) Each employee has the obligation to avoid directly or indirectly engaging in certain economic activities and to avoid family relationships, personal relationships, and business relationships that will or may:
  - a) Conflict with the interests of the Company;
  - b) Prevent the employee from fulfilling their duties to the Company with loyalty, objectivity, effectiveness, and completeness.
  
- (2) Each employee must not engage in the following situations or activities:
  - a) Work for or provide services to competitors, customers, or suppliers (whether compensated or not) - that is, being employed by the Company's competitors or potential competitors, customers, or suppliers, regardless of the form and nature of such employment;
  - b) Part-time employment (dual employment) - having a second job that affects or may affect their ability to fulfill their duties to the Company with loyalty, objectivity, effectiveness, and completeness;
  - c) Abuse of influence - influencing or attempting to influence business transactions between the Company and another entity, such as the Company's employees and/or their family members having direct or indirect economic interests in that entity or serving as senior managers, directors, employees (including dispatched employees), partners, agents, or consultants, and the employee directing the Company's business to entities owned or controlled by their family members;
  - d) Investment in competitors, customers, or suppliers - having substantial shares or interests in competitors, customers, or suppliers through investment, participation in management, or contractual control (for example, stocks, except for holding less than one percent (1%) of the circulating shares of publicly listed companies in the form of investment);
  - e) Use of insider information - using Company confidential information or business opportunities obtained through the labor relationship with the Company for the economic benefit of oneself, friends, or family members;
  - f) Mis-use of Company assets - conducting private business during working hours or using Company facilities, equipment, or other assets for private business;
  - g) Insider trading - using non-public information obtained during employment with the Company to deal in the securities of the Company or other companies, or providing such non-public information to others;
  - h) Existence or creation of other situations that may affect the employee's ability to act in the best interests of the Company.
  
- (3) If an employee discovers any behavior or situation that may violate the above prohibitions, the employee is obliged to report it promptly in accordance with the requirements of Part 5 of these Guidelines.

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- (4) Unless already declared and approved in advance in writing in accordance with the procedures of these Guidelines, the following situations must be avoided, and the following activities are prohibited:
- a) Self-employment - if the employee's actions are the same or similar to their work in the Company, or affect their ability to fulfill their duties to the Company satisfactorily, the employee must obtain the Company's prior written approval:
  - i. Investing in or owning one or more businesses;
  - ii. Engaging in a business activity and receiving compensation;
  - iii. Participating in the operation of a family business or working in a family business, whether or not compensation is received.
    - b) Accepting gifts or other compensation - accepting gifts, money, loans, services, or any compensation from entities or individuals seeking to establish business relations with the Company (this would make the recipient potentially subject to undue influence, excluding employees obtaining loans from lending institutions at current market interest rates or accepting gifts of money or goods from the entities or individuals);
    - c) Family members working in competitors', customers', or suppliers' companies - that is, the employee's family members are employed by the Company's competitors or potential competitors, customers, or suppliers, regardless of the nature of such employment;
    - d) Providing consulting services for individuals/institutions or organizations outside the Company - that is, employees using their professional knowledge and skills, work experience, industry awareness, etc., to accept consultations from individuals/institutions or organizations outside the Company, whether paid or unpaid, whether the content of the consultation is related to the Company or not.
- (5) New employees or current employees with family members also working in the Company must report internal employee relatives and conflict of interest information to the Company at the first time. The Company will comprehensively assess the reported information, and if a conflict of interest is confirmed, it has the right to adjust the positions of the relevant personnel according to the "Conflict of Interest Avoidance Principle." Failure to report will be dealt with in accordance with Part 5.(2) "Penalties for Violating These Guidelines." When the following situations occur (including but not limited to), the Company has the right to adjust the positions of the relevant personnel according to the "Conflict of Interest Avoidance Principle":
- a) Employees and their family members are employed in the same department, with a direct superior-subordinate relationship, such as employees reporting to their family members;
  - b) Employees and their family members are employed in the same department, with an indirect superior-subordinate relationship, such as employees reporting to an intermediary, who in turn reports to the employee's family members;
  - c) Employees and their family members are employed in different departments but are involved in the operation or review of important business dealings between their

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respective departments, directly or indirectly affecting the independence and fairness of the dealings;

- d) Employees and their family members are employed by the Company at the same time, and one of them is employed in a sensitive department, including but not limited to the Human Resources Department, Finance Department, Kuaishou Integrity and Compliance Department, Internal Audit Department or Internal Control Department, etc.

#### 4. Declaration Procedures

##### (1) Proactive Declaration

Most potential conflicts of interest can be resolved through proactive declaration and appropriate handling of the potential conflict of interest situation. All employees should promptly, truthfully, and proactively declare their actual or potential conflicts of interest to the Company comprehensively.

##### (2) Timely Update of Declaration

All employees should promptly declare any new conflicts of interest due to changes in job positions, department structures, or work areas, or due to personal reasons. If the information changes after the declaration, it must be updated at any time.

##### (3) Conflict of Interest Management Strategies

After the employee's declared information is assessed and actual or potential conflicts of interest are found, the Company can handle it according to the following strategies:

- a) Prohibition Strategy: For situations under Part 3.(2) and other prohibited conflicts of interest, the Company can eliminate actual or potential conflicts of interest by terminating the labor contract with the employee, and if losses have been caused to the Company, the Company has the right to demand compensation;
- b) Avoidance Strategy: For situations under Part 3.(5) and other "Conflict of Interest Avoidance Principle" situations, the Company should adjust the positions of relevant personnel, work areas, or make relevant personnel avoid projects or business modules with conflicts of interest. For situations where the avoidance strategy cannot be implemented, based on business or management needs, the prohibition or exemption strategy can be used;
- c) Exemption Strategy: For situations under Part 3.(4) and other exemptible situations:
  - i. If the conflict of interest does not affect their performance of duties or the interests of the Company;
  - ii. If, while ensuring the interests of the Company, the conflict can be exempted with appropriate control measures, which include but are not limited to special approvals, signing specific confidentiality agreements and integrity commitment letters, and conducting regular risk assessments. Should the existing conflict of interest have caused losses to the Company, the Company may employ the prohibition strategy and has the

right to seek compensation.

#### (4) Decision-making and Approval Procedures

For actions that may potentially create conflicts of interest, internal processes must be followed to obtain assessment and approval, including declaration, preliminary evaluation, risk assessment, communication of decisions, handling of objections to disposal decisions, or obtaining exemptions (Exemptions to these Guidelines can only be granted in special circumstances, after special approval and implementation of necessary control measures, with the Company providing written exemptions based on specific situations. Decisions on exemption strategies are to be copied to the Internal Audit Department and Internal Control Department). Without approval, employees are prohibited from undertaking any activities that may cause conflicts of interest.

### 5. Reporting of Violations and Prevention of Retaliation

(1) If an employee discovers any conduct that may violate these Guidelines, they should promptly report it anonymously or by name through the following channels:

- a) Direct supervisor or higher authority
- b) Integrity and Compliance Department
- c) Human Resources Department
- d) Internal Audit Department
- e) Internal Control Department
- f) Reporting email: [lianzheng@kuaishou.com](mailto:lianzheng@kuaishou.com)
- g) Official reporting website: <https://jubao.kuaishou.com/#/?channel=KSPC>

To protect the rights of reporters, Kuaishou has established the "Kuaishou Integrity Reporting Management Standards," prohibiting any form of retaliation.

#### (2) Penalties for Violations of These Guidelines

Should any violations of these Guidelines occur, the Company has the right to discipline employees who violate these Guidelines, which may include immediate termination of the labor contract and legal proceedings.

### 6. Supplementary Provisions

(1) In these regulations, family members include "relatives" and persons with an interest relationship with the individual and their "relatives," where "relatives" refer to both direct and collateral relatives, as follows:

- a) Direct relatives include: spouse (including partners), parents (including adoptive parents), grandparents/grandparents-in-law, children (including adopted children), and grandchildren/grandchildren-in-law;
- b) Collateral relatives include: siblings and their spouses of the individual and their

spouse (including partners), cousins (within three generations with a common ancestor, i.e., sharing the same grandparents or great-grandparents) and their spouses, uncles/aunts/nephews/nieces and their spouses, parents of the spouse and their grandparents/grandparents-in-law.

(2) Consultation

Inquiries regarding these Guidelines will be submitted to the Integrity and Compliance Department, Human Resources Department, Internal Audit Department or Internal Control Department; any department personnel and management receiving the consultation shall provide timely and clear guidance and keep the employee's consultation confidential.

(3) Policy Amendment Rules

- a) The Company will review these Guidelines annually or as needed and make appropriate amendments if necessary;
- b) The Integrity and Compliance Department will conduct regular training for Company employees on these Guidelines and related systems as the situation requires.

## 7. Attachment

"Kuaishou Technology Gift Declaration and Management Framework Guidelines"

*Disclaimer:*

*Should there be any ambiguity or inconsistency between different language versions of these Guidelines, the Chinese version shall prevail.*

Attachment:

## **Kuaishou Technology Gift Declaration and Management Framework Guidelines**

### **1. Purpose**

To maintain the integrity and self-discipline of the Group's employees in internal operations and external interactions, and to create a transparent, fair, and honest working atmosphere, these Guidelines are issued in accordance with internal regulations such as the "Kuaishou Provisional Regulations on Avoiding Conflicts of Interest" and the actual situation of the Company.

### **2. Scope of Application**

These Guidelines apply to all employees of the Group (including part-time employees, employees with labor contracts, interns, and those who have signed employment agreements, labor agreements, dispatch agreements, consulting contracts, etc.).

### **3. Detailed Rules**

#### (1) Concept of Gifts

Refers to tangible assets, banquet sponsorships, securities with value, and various forms of benefits directly or indirectly given to employees themselves or their immediate family members by units or individuals seeking or already having business dealings with the Company out of business etiquette, including but not limited to the following forms:

- a) Valuable items such as precious metals, jewelry, antiques, calligraphy, real estate, cars, mobile phones, watches, computers, televisions, etc.;
- b) General physical gifts such as food, tobacco, alcohol, cosmetics, daily necessities, office supplies, etc.;
- c) Dining or sponsorships such as business banquets, training, travels, promotional offers, etc.;
- d) Other forms of benefits such as securities with value, loan guarantees, etc.;
- e) Other services with economic benefits or items with value.

#### (2) General Principles for Gift Management

- a) In principle, the Company prohibits employees from accepting gifts, especially cash and cash equivalents such as recharge cards, shopping cards, vouchers, and stored-value cards, as well as other gifts;



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- b) In cases where gifts cannot be refused, the acceptance of gifts should be based on business etiquette and should not affect the handling of any business, resulting in unfair or unjust behavior;
  - c) The Company implements a declaration system for employees to accept gifts;
  - d) Prohibits frequently accepting gifts from the same person or entity;
  - e) No department or personnel may handle gifts without authorization, neither conceal them, exchange them, or retain them.

### (3) Gift Declaration and Management

#### a) Reporting and Registration Process

Employees who accept gifts should apply for registration to their direct supervisor and the Kuaishou Integrity and Compliance Department through the Company's provided declaration channels within 3 working days. For high-value gifts, they must also register and submit to the Company's Gift Management Unit under the Administration Department.

#### b) Reporting Method

The Kuaishou Integrity and Compliance Department is responsible for coordinating the development of the gift declaration system. The declarer should use the system to declare gifts, providing specific descriptions such as the time of gift acceptance, the entity/individual giving the gift, the relationship between the giver and the Company, the unit price and quantity of the gift, and the type of gift. They should also upload photos of the gifts. If the gift is submitted to the Administration Department by courier, they should also upload a photo of the courier slip in the system to track the logistics.

#### c) Gift Management

- i. Gifts that do not need to be handed over to the Company, after registration, are handled by the department where the recipient works, with a recommendation to prioritize team building or rewards for outstanding team members;
- ii. Gifts that need to be handed over to the Company will be collected and temporarily stored by the Administration Department, and will be processed altogether after joint inventory with the Kuaishou Integrity and Compliance Department, the Internal Audit Department and the Internal Control Department as appropriate.

### (4) Violation of These Guidelines and Prohibition of Retaliation

If any violation of these Guidelines is found, including but not limited to the following behaviors:

- a) Concealing or not registering gifts on time after acceptance;
- b) Not registering or not handing over gifts that should be registered and handed over. Please report through the Integrity Reporting email: [lianzheng@kuaishou.com](mailto:lianzheng@kuaishou.com) or the Integrity Reporting official website: <https://jubao.kuaishou.com/#/?channel=KSPC> for real-name or anonymous reporting. After receiving the report, the Kuaishou Integrity and Compliance Department will handle it in a timely manner according to the relevant system and process. Kuaishou protects employees who report in good faith, has formulated and established the "Kuaishou Integrity Reporting Management Standards," and prohibits any form of retaliation.

#### **4. Supplementary Provisions**

- (1) The Company's Integrity and Compliance Department, Human Resources Department, Internal Audit Department, and Internal Control Department have the right to interpret these Guidelines.
- (2) Detailed operations shall be based on the internally issued "Kuaishou Provisional Regulations on Avoiding Conflicts of Interest" and "Kuaishou Gift Declaration and Management Detailed Rules".