

## 关于反商业贿赂的管理层合规声明

### Management Commitment Statement of Anti-commercial Bribery

日期：2021 年 04 月 20 日

DATE: 20 April 2021

致：全体董事、管理人员、员工及合同工（顾问、实习生）

TO: Directors, Officers, Employees and Contract Employees (Consultants, Interns)

深圳市优必选科技股份有限公司（以下称“优必选”）作为全球顶尖的人工智能和人形机器人研发、制造和销售为一体的高科技创新企业，致力于遵守其注册地、开展业务所处国家和地区可适用的法律法规，包括反商业贿赂法律法规的各项要求。商业贿赂行为违背了市场经济的基本原则，破坏市场秩序，妨碍公平竞争和资源的合理配置，增加企业经营成本，损害合作双方关系的健康发展。商业贿赂还败坏社会风气，腐蚀企业从业人员，成为滋生腐败和经济犯罪的温床。综上认识，优必选声明如下：

UBTECH ROBOTICS CORP LTD (hereinafter referred to as “UBTECH” or “the Company”), one of the world’s famous artificial intelligence and humanoid robot R&D, manufacturing and sales of high-tech innovation enterprises, is commitment to comply with any and all applicable laws, regulations of the places of incorporation and business location of UBTECH, including the requirements of anti-commercial bribery laws and regulations. Commercial bribery violates basic principles of market economy, destroys normal market order, hinders fair competitive activities, rational allocation of resources, and healthy development of cooperative relations, increases enterprise operation costs. Commercial bribery also corrupts social conduct, corrodes enterprise employees, and becomes breeding ground of corruption and economic crimes. Based on the above

understanding, our Statement of anti-commercial bribery is as follows:

1. 优必选鼓励在商业交往中的礼貌行为，但是坚决反对企图通过赠与礼物、给与佣金或其他形式的私人好处而对相互关系施加不当影响的商业贿赂行为。

I. UBTECH encourages courtesy behavior in business interactions, but firmly opposes commercial bribery that attempts to improperly influence on mutual relations through gifts, commissions or other forms of private benefits.

2. 在持续向所有合作方发出《反商业贿赂倡议书》基础上，优必选要求任何员工在与第三方（如客户、采购商、代理商、供应商、报关行、货运代理人等）的交往过程中，应遵守优必选相关职业操守规定，保证双方合作过程的公正、公平、透明，无任何歧视或欺骗行为。员工不得从第三方处接受或索取个人利益，或利用职位影响第三方的选择与评估，使特定合作方得到“特殊待遇”；第三方有责任抵制、反对并举报优必选员工不符合本声明规定的违法行为。

II. On the basis of continuously sending “the Anti-commercial Bribery Initiative” to all partners, UBTECH requires any employee to abide by UBTECH’s relevant professional ethics regulations in the cooperation process with any third party (such as customer, purchaser, agent, supplier, customs broker, freight forwarders, etc.) to ensure the fairness, transparency without any discrimination or fraud among all parties. No employee can accept or solicit personal benefits from any third party, or use his position to influence selection and evaluation of any third party, so that such specific partner gets “special treatment”. And any third party has the full responsibility to resist, oppose and report the employee’s illegal behavior that does not comply with any provision of this Statement.

3. 在组织机构方面，优必选已设立合规遵从委员会，以确保公司反商业贿赂合规机制等合规机制的有效实施。合规遵从委员会有权否决涉嫌违反反商业贿赂法律法规的交易。公司管理层将给予合规遵从委员会及合规团队足额的资源，以支持反商业贿赂机制有序运行。

III.As for the organizational structure, UBTECH has established Compliance Committee to ensure effective establishment and operation of the Company's anti-commercial bribery compliance mechanism and other compliance mechanisms.The Compliance Committee is entitled to veto any transaction suspected of violating laws and regulations of commercial bribery. Our management shall award the Compliance Committee and the Compliance Team with sufficient resources to support orderly operation of anti-commercial bribery compliance mechanism of the Company.

4. 优必选对商业贿赂行为采取零容忍态度，严厉打击任何商业贿赂行为，对违反本声明相关规定的员工，将立即解聘，并永不录用；对违反本声明相关规定的第三方，一经查证，将立即解除合作关系，并保留按有关反商业贿赂法律法规追究相关责任的权利。

IV.UBTECH shall not tolerate any commercial bribery and strictly crack down on any commercial bribery. Any employee who violates the relevant provisions of this Statement shall be dismissed immediately and never be employed.If any third party violates the relevant provisions of this Statement, UBTECH shall immediately terminate cooperation relationship and reserve the right to seek legal actions according to relevant anti-commercial bribery laws and regulations.

5. 在内部制度方面，优必选已于2018年发布《优必选员工商业行为准则》，并在实施过程中不断修改和完善。《优必选员工商业行为准则》发布后，公司先后进行了多轮反商业贿赂在内的风控培训。“从制度建设、构建公司防控商业贿赂长效机制”的思路入手，公司也进行了《员工商业行为准则》相关规定载入劳动合同、要求供应商签署《反商业贿赂承诺书》、员工文化价值评价引入反商业贿赂合规等举措，后续将不断制订和优化反商业贿赂内部管理制度，建立和健全反商业贿赂合规审查流程。同时，将持续开展反商业贿赂合规的宣传和培训，通过多层次、全方位的培训，不断提升优必选全体成员的反商业贿赂合规意识。

V.In terms of internal management regulations, UBTECH has officially released the “UBTECH's Code of Business Conduct for Employees” in the year 2018, which has

been continuously revised and improved. After the release of the “UBTECH’s Code of Business Conduct for Employees”, the Company has carried out several rounds of risk control training including anti-commercial bribery. With the thought of establishing a long-term mechanism to prevent and control commercial bribery, The Company has also implemented measures, such as adding the relevant provisions of the “UBTECH’s Code of Business Conduct” into labor contract, requiring suppliers to sign an “Anti-Commercial Bribery Commitment”, and introducing anti-commercial bribery compliance into Employee Cultural Value Evaluation. UBTECH shall continue to formulate and optimize the internal management regulations, establish and improve the compliance review process of anti-commercial bribery compliance. At the same time, UBTECH shall conduct publicity and training on anti-commercial bribery compliance. Through multi-level and all-round training, it shall enhance and continuously improve compliance awareness of all employee members of UBTECH.

本声明适用于优必选的所有部门、控股子公司和分支机构。

This Statement applies to all departments, holding subsidiaries and branches of UBTECH.

优必选反商业贿赂合规举报邮箱: [compliance@ubtrobot.com](mailto:compliance@ubtrobot.com)

Anti-commercial Bribery Whistle blower Contacts: [compliance@ubtrobot.com](mailto:compliance@ubtrobot.com)

董事长:



Chairman:

2021年04月20日

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