

Xiaomi Corporation

Anti-Bribery and Anti-Corruption Policy

This policy is established to articulate the principles and strategies adopted by Xiaomi Corporation (hereinafter referred to as "Xiaomi" or the "Company") in anti-bribery and anti-corruption. The Company is committed to complying with global anti-bribery laws and regulations. With a zero-tolerance, full-coverage, and no-exception approach to anti-corruption, we explicitly prohibit all forms of corruption and bribery to uphold a fair and competitive business environment and protect the Company's reputation and stakeholders' rights and interests.

This policy applies to all employees (including part-time and intern personnel) of Xiaomi Corporation and its subsidiaries ([click here](#) for details in the "Latest Financial Report"), as well as individuals or entities providing services to Xiaomi (including labor service providers/consultants, third-party dispatched personnel, outsourced personnel, and individual industrial and commercial households).

In view of the differences in legal systems across the Company's operational regions, in the event of any inconsistency between this policy and local laws and regulations, the stricter requirement and local laws and regulations shall prevail.

I. Basic Principles

Xiaomi strictly prohibits any employee, business partner, or any other individual or entity acting on behalf of the Company from engaging in any form (direct/indirect, completed/attempted) of bribery in commercial activities, including offering, promising, giving, or authorizing the provision of money, property, or other undue benefits, as well as covering up or whitewashing bribery acts and carrying out activities with potential bribery risks. Employees are strictly prohibited from engaging in internal corrupt practices during their duties, such as favoritism, abuse of power, or seeking personal gain at the expense of the Company's interests or creating potential risks. The Company requires all personnel to comply with the Xiaomi Corporation Employee Code of Conduct, Xiaomi Corporation Code of Integrity, and other applicable commercial conduct norms and ethical standards. Any verified cases of bribery or corruption shall be met with severe penalties.

II. Prohibited Conduct in Major Business Scenarios

1. Gifts and Entertainment

The Company strictly prohibits the following acts:

- a. Providing cash or cash equivalents (including but not limited to gold bars,

marketable securities, savings insurance, fund shares, commercial gift cards, etc.).

b. Providing gifts and entertainment with values significantly exceeding normal business practices (including but not limited to: gifting real estate, automobiles, jewelry, high-value commemorative coins, luxury brand products, premium holiday gift sets, etc., as well as high-end club memberships, domestic and international travel, luxury cruises, and other extravagant entertainment).

c. Providing gifts or entertainment that may be deemed unethical or contrary to universal values, even if such activities or transactions are considered legal in the local jurisdiction (including but not limited to: gifting products made from endangered wildlife, narcotics, narcotic-like substances, adult-content gifts, etc., as well as entertainment involving adult entertainment, gambling, or consumption of protected flora and fauna).

d. Providing personal hospitality or social events (including but not limited to: family gatherings, alumni reunions, etc.).

e. Directly or indirectly accepting or providing cash or cash equivalents as hospitality expenses, or conducting hospitality activities in the provider's absence (including but not limited to: accepting cash for internal company events, covering the other party's internal meal expenses, etc.).

2. Business Trip Arrangements

The Company strictly prohibits the following acts:

a. Travel without a legitimate business purpose (including but not limited to: personal tourism, non-company-related trips, or itineraries that include tourist activities).

b. Travel for non-business-related individuals (including but not limited to: the recipient's spouse, children, partners, other family members, or any other companions unrelated to commercial activities).

c. Providing travel funding to individuals in the form of cash or cash equivalents (including advances of cash), regardless of whether such funds are used to pay travel expenses, reimbursed as paid travel costs, or scheduled for future repayment.

d. Improper, illegal, or commercially unreasonable travel activities that may be deemed bribery or corruption (including but not limited to: private jet travel, providing business or first-class accommodations to mid-level or junior personnel, or excessively luxurious lodging arrangements). Such activities also include inappropriate modifications during business travel (e.g., cabin class upgrades, hotel room upgrades, etc.).

3. Recruitment and Employment

The Company conducts recruitment and employment based on genuine, necessary, and reasonable job requirements, strictly complies with the Company's compliance requirements and human resources policies, and ensures the fairness,

consistency, and transparency in the recruitment and hiring process.

The Company prohibits any recruitment and employment activities aimed at seeking improper benefits or conducted through non-compliant means, including but not limited to:

- a. Facilitating job opportunities at the Company for specific ineligible individuals.
- b. Using the Company's relationships or influence to secure external job opportunities for specific ineligible individuals.
- c. Assisting specific individuals in obtaining performance evaluation results that exceed their actual work performance.
- d. Assisting specific individuals in obtaining compensation or benefits (including training, subsidies, benefits, overseas transfers, etc.) that are inconsistent with their positions and performance.

4. Political Donations

The Company prohibits any form of participation in political contributions (whether direct or indirect), including but not limited to:

- a. Without prior approval under applicable laws and the Company's written consent, providing funds, assets, services, or facilities (such as venue or equipment leasing) directly in the name of Xiaomi Corporation or its subsidiaries to public office candidates, political parties, party officials, or political organizations is strictly prohibited.
- b. Circumventing restrictions on political contributions through third-party channels, employee/affiliate nominees, or disguised support (such as providing funds to non-governmental organizations linked to political entities under the guise of 'public welfare sponsorships' or 'policy research collaborations') is prohibited.

5. Charitable Donations or Contributions

The Company requires that all charitable donations (including monetary donations and gifts of Xiaomi products, equipment, or any valuable items) must undergo review to assess their commercial rationale, donee appropriateness and compliance with applicable laws.

Prohibited donation activities include, but are not limited to:

- a. The donee lacks legal capacity to accept donations, such as for-profit organizations or individuals acting as recipients of charitable donations.
- b. There is evidence that the donee lacks adequate capability to manage and utilize donated assets.
- c. The donee is currently or has previously engaged in corrupt activities, and there is no conclusive evidence that the risk of corruption has been eliminated.
- d. Failing to execute a written donation agreement; or, the donation agreement includes commercial conditions or is conducted for commercial gain.

e. The donee fails to apply donated funds/property to public welfare purposes; or, fails to administer and utilize donated assets in accordance with the donation agreement.

6. Commercial Sponsorships

Prohibited sponsorship activities include, but are not limited to:

- a. The sponsored entity lacks the legal authority or capability to conduct the sponsored activity or project.
- b. Designating government authorities as sponsorship recipients without justifiable cause.
- c. The sponsored entity is currently or has previously engaged in corrupt activities, and there is no conclusive evidence that the risk of corruption has been eliminated.
- d. Sponsorship activities whose themes, content, or forms violate laws and regulations or contravene public order and good customs.
- e. Failing to execute a written sponsorship agreement; or, the sponsorship agreement contains improper stipulations.
- f. The sponsored entity fails to use sponsorship funds/property as agreed in the sponsorship agreement or fails to fulfill its obligations thereunder.

7. Investments and Mergers & Acquisitions

The Company prohibits investment transactions with the following characteristics:

- a. Conducting investment transactions at manifestly unreasonable consideration (e.g., acquiring equity at excessively high prices or selling equity at excessively low prices) to benefit counterparty stakeholders.
- b. Failing to include valuation adjustment, performance compensation, or equity buyback clauses in transaction agreements, and failing to establish other effective risk mitigation mechanisms.
- c. The investee or its actual controller is currently or has previously engaged in corrupt activities, and there is no conclusive evidence that the risk of corruption has been eliminated.
- d. Identifying material compliance risks during due diligence and lacking appropriate means to mitigate such risks to an acceptable level.
- e. Providing undue benefits to key personnel of counterparties, government regulators, securities exchanges, or other relevant external parties to secure or expedite transaction closure.

III. Grievance and Reports

Xiaomi encourages employees to report any conduct that may harm the interests of the Company or its employees (regardless of whether actual harm has occurred)

through official channels. Whistleblowers may choose to report either anonymously or non-anonymously and should provide truthful and detailed information to the extent possible, including but not limited to the names of involved parties, their departments (or names of business partners), job titles, the time and location of the alleged misconduct, and any supporting documents, to facilitate follow-up investigations by relevant departments such as Safety Investigation and Human Resources.

The Company has established the following official reporting channels:

- Reporting email: tousu@xiaomi.com
- Reporting platform: <https://integrity.mi.com>

Upon receiving a report, the designated case officer shall provide preliminary feedback to the whistleblower within one business day using a standardized response template. The case shall then be escalated to investigators or other relevant business units within three business days in accordance with case allocation rules. The responsible department shall conduct an investigation into the alleged employee misconduct based on the Xiaomi Corporation Whistleblower Protection and Incentive Policy and communicate the investigation progress or outcome to the whistleblower.

IV. Oversight and Training

Xiaomi is dedicated to promoting the development of anti-bribery and anti-corruption management through both internal and external efforts. The Board of Directors assumes the highest governance responsibility for anti-bribery and anti-corruption initiatives, and authorizes the Ethics Committee to oversee the planning, implementation, and supervision of specific tasks, as well as the investigation and accountability of violations.

The Safety Investigation and Legal teams conduct annual internal control and audit activities in accordance with this policy, continuously improving the anti-corruption management framework and reviewing the policy as needed to align with changes in local laws, regulations, and international conventions across operational jurisdictions. Additionally, the company undergoes annual independent audits by third parties based on the ISO 37001 Anti-Bribery Management System to prevent and mitigate bribery and corruption risks.

Xiaomi actively fosters a culture of integrity by implementing anti-bribery and anti-corruption principles through various measures, including but not limited to requiring all employees to sign the Integrity Commitment Letter, providing specialized training programs for senior management and key positions, and organizing compliance and integrity awareness activities.