

ZTO Anti-Corruption Policy

ZTO Express Group (hereinafter referred to as "the Company") is committed to adhering to relevant national laws, regulations, and rules in its anti-corruption efforts. This policy aims to enhance the integrity and fairness of the Company, prevent and combat corruption, and ensure transparency and impartiality in the company's operations.

1. Scope of Application

This policy applies to all directors, managers, and employees of ZTO Express Group and its subsidiaries, including full-time, part-time, and temporary personnel. It also extends to all external parties that cooperate with the Company (hereinafter referred to as "Partners"), including but not limited to business partners, entities involved in donations and charitable activities, and beneficiary groups.

2. Definition of Corruption

For the purpose of this policy, "corruption" refers to any act that violates national laws, company regulations, or ethical standards, with the intent of gaining undue personal or group benefits. This includes, but is not limited to, bribery, abuse of power, embezzlement, and other criminal acts related to one's job or position.

3. Employee Anti-Corruption Regulations

Employees of ZTO Express are required to uphold integrity and avoid engaging in any form of corrupt conduct. Specifically, employees are prohibited from soliciting or accepting bribes, providing unfair advantages to certain partners, or participating in bribery in any form. Employees must strictly adhere to the Company's "Employee Code of Conduct."

4. Partner Anti-Corruption Regulations

Partners, including business partners and service providers, are prohibited from offering any form of bribe or inducement to employees of the Company. This includes, but is not limited to, money, gifts, or sponsoring high-cost activities or events aimed at influencing business decisions. Partners must ensure that their business transactions with the Company are conducted fairly and transparently.

5. Anti-Corruption Training

The Company will provide ongoing education on anti-corruption policies and relevant regulations through new employee onboarding training and regular training sessions for all employees (full-time, part-time, or other temporary forms) and partners.

6. Policy Implementation and Supervision

The Company's Internal Audit Department will be responsible for conducting regular audits to monitor compliance with this policy among both employees and partners. The Internal Audit Department will report findings and concerns directly to senior management for further action.

7. Reward and Punishment Mechanism

Employees found in violation of this anti-corruption policy will be subject to disciplinary action depending on the severity of the violation. Serious violations may result in referral to judicial authorities for legal action. Similarly, Partners who breach the anti-corruption policy will face appropriate punitive measures, which may include potential legal liability.

8. Complaint and Reporting Mechanism

The Company encourages employees and partners to report corruption through proper channels. A 24/7 hotline and reporting email (lianzheng@zto.com) are provided in multiple languages to ensure accessible communication. The Company will protect the legitimate rights of whistleblowers and maintain strict confidentiality of reports.

9. Policy Review and Update

The Company will review and update this anti-corruption policy regularly to ensure its alignment with national laws, company operations, and industry standards.