

Atour Lifestyle Holdings Limited

Anti-Bribery and Anti-Corruption Policy

Introduction

To achieve our values of "keeping upright hearts and following the right paths" and to deliver value to our customers, Atour has zero tolerance towards bribery and corruption, and requires each individual work for Atour earnestly fulfill their anti-bribery and anti-corruption commitments.

1. Purpose

To implement the anti-bribery and anti-corruption compliance requirements of the Code of Business Conduct and Ethics, Atour Lifestyle Holdings Limited Anti-Bribery and Anti-Corruption Policy (this "Policy", the "ABAC Policy") sets forth the obligations and responsibilities of Atour Lifestyle Holdings Limited and all of its direct or indirect subsidiaries and affiliated companies (collectively, "Atour Group" or "Atour", the "Company" or "we") on corruption and bribery and provides guidelines for all directors, officers, employees, professionals, advisers and other persons of similar nature engaged by Atour (each, an "Employee" solely for purposes of this Policy and collectively, the "Employees" or "you"), whether such individuals work for Atour on a full-time, part-time, external advisory, or temporary basis (including employees outsourced from employment agencies or other entities).

2. Overview

Atour is committed to reasonable standards of business conduct, which requires us to conduct our business in a legal, honest and ethical way. Atour and its Employees are subject to anti-bribery and anti-corruption laws and regulations in the jurisdictions where we exist and conduct business, this Policy aligns with relevant international and domestic ABAC Laws and regulations, including but not limited to the Law of the People's Republic of China Against Unfair Competition, the Criminal Law of the People's Republic of China, the U.S. Foreign Corrupt Practices Act(the "FCPA"). Atour's zero tolerance approach to bribery and corruption, means that Atour prohibits offering, giving, promising, transferring, or soliciting Anything of Value, directly or indirectly, to or from any Third Party, Public Official, or any other party to secure an improper benefit.

3. Definitions

In this Policy, unless otherwise specified, the following terms shall have the following meanings:

"Anything of Value" is broadly defined to include both tangible things and intangible things, such as:

- Cash and cash equivalents (e.g., prepaid cards, vouchers);
- Charitable or political contributions and sponsorship;
- Employment opportunities (e.g., full- or part-time, internship);
- Excessive or unwarranted commissions;
- Facilitation payments;

- Favorable contracts;
- Gifts, entertainment and hospitality (e.g., meals, travels, invitations or tickets to events);
- Investment opportunities or stock options;
- Kickbacks; and
- Services that would otherwise be paid for and/or purchased.

“**Bribery**” is the offering, giving, soliciting, promising, authorizing or acceptance of anything of value directly or indirectly (e.g., through a third party) with the intention to obtain improper benefit or commercial advantage.

“**Corruption**” is an illegal or unethical act that involves the abuse of authority or breach of official duty for personal financial gain or other undue advantage. Corruption can include giving or accepting bribes.

“**Public Official**” refers to all (including China and other countries or regions) central and local state agencies, enterprises, institutions, international public organizations and other personnel engaged in official duties in accordance with the law, including (i) power/legislatures at all levels, all levels Personnel engaged in public service in party organizations, administrative agencies at all levels, judicial agencies at all levels, military agencies at all levels, state-owned companies, enterprises, institutions, people's organizations, state public organizations, and (ii) state agencies, state-owned enterprises, and institutions Personnel assigned to perform official duties in non-state-owned enterprises, public institutions, social groups, and (iii) political party officials, and any candidates for political office. Other personnel who are engaged in official duties in accordance with the law also belong to the category of state workers.

“**Third Party**” refers to any third-party individual or organization that has a direct business relationship with the company or represents the group, including suppliers, business partners, merchants with contractual relationships, distributors, agents or intermediaries, consultants, joint venture partners, etc. End users and consumers are not third parties as defined in this policy.

4. Requirements

4.1 Prohibition of Facilitation Payments

Facilitation payments are prohibited. Facilitation payments include Anything of Value provided to a Public Official to facilitate or accelerate a public decision or action (including but not limited to issuing licenses, granting permits, or giving approvals).

4.2 Compliance with Gifts, Entertainment and Hospitality Requirements

Notwithstanding the foregoing, our business decisions will not be influenced by, nor shall our business opportunities or advantages rely upon, any gifts, entertainment, hospitality or other similar things of value. Gifts, entertainment and hospitality that are within local customary business practices can promote strong working relationships and goodwill, but they must be appropriate, reasonable, and not lavish. Giving or receiving gifts in cash and cash equivalents to or from any Third Party, Public Official, or any other party is strictly prohibited.

4.2.1 Giving Gifts, Entertainment and Hospitality

Any gift, entertainment, or hospitality paid for by or on behalf of Atour must:

- Be for a legitimate business purpose;

- Be reasonable and customary;
- Not be lavish or too frequent;
- Be accurately recorded on the Company's financial books and records; and

Comply with applicable laws, regulations and all Related Policies and Guidelines of Atour. Please refer to the Financial Reimbursement and Payment Management Policy for the approval standards and limits.

4.2.2 Accepting Gifts, Entertainment and Hospitality

Atour prohibits any Employee from taking advantage of his or her job, title or position with Atour to solicit or accept any personal gifts, proprietary interests or any entertainment or hospitality. Small non-cash gifts intended to promote corporate culture and offered in line with local customary business practices (e.g. branded pen or calendar) and non-lavish meals that serve a legitimate business purpose do not violate this general prohibition.

4.3 Charitable Contributions and Sponsorship

Contributing to charitable causes is important to Atour. Any Charitable Contribution or Sponsorship on behalf of the Company must:

- Be made openly and transparently for bona fide charitable purposes;
- Not be given to influence a business decision, or to receive business consideration or a reward in return;
- Not be given directly or indirectly to a Public Official or his/her Relatives for personal use;
- Not pose a reputational risk to the Company; and
- Be recorded accurately in the Company's financial books and records.

Any Charitable Contributions and Sponsorship made on behalf of the Company must be pre-approved by the Executive Committee.

4.4 Political Donations and Contributions

Atour enforces the prohibition against directors, officers, and employees engaging in political donations to any state functionaries, political parties, political movements, politicians, or political candidates and their affiliated organizations. It is explicitly stated that the aforementioned individuals are prohibited from engaging in the aforementioned actions through their relatives or related entities such as holding companies.

Personal political contributions made with an individual's own funds are not subject to prohibition under this policy; however, individuals are expressly prohibited from seeking reimbursement from the Company for such contributions. Political donations encompass, but are not restricted to, monetary contributions, loans, sponsorships, donations of property or services, support for political parties' promotional activities, and the purchase of tickets to fundraising events.

4.5 Hiring of Referred Candidates

Atour makes impartial employment decisions based only on a candidate's qualifications for a position. Employment candidates who are referred or recommended to Atour by a Third Party, Public Official or customer will proceed through Atour's standard objective employment selection process and not be provided any advantage. Extending an Offer of Employment to a referred candidate with the expectation that Atour would receive or retain business, or be given any undue advantage, is prohibited.

The following guidelines apply to the selection and management of Third Parties:

- Information about Third Parties should be researched to assess their background, qualification and reputation, particularly when they interact with Public Official on our behalf.
- Under no circumstance may Atour engage a Third Party to participate in any activity, action, or conduct that violates applicable laws or the principles or requirements of this Policy.
- Atour prohibits any business relationship with a Third Party that has bribed or attempted to bribe our Employees.
- Third Parties are expected to share Atour's zero tolerance approach to bribery and corruption and Atour's commitment to compliance. Whenever possible, Third Parties should review and certify their acceptance of this Policy and any other applicable Atour compliance policy.
- Employees who engage, manage or interact with Third Parties are responsible for identifying and elevating suspected violations of applicable laws or this Policy by such Third Parties. As part of Atour's broad commitment to compliance, all Employees are empowered to report or elevate suspected violations of applicable laws or this Policy by Third Parties.

5. Interactions with Public Official

In the countries and regions where the Company exists and operates, there exist anti-bribery and anti-corruption laws that are applicable to directors, officers, and employees, which tightly regulate engagements with state functionaries.

This policy unequivocally prohibits directors, officers, and employees from directly or indirectly offering, providing, promising to provide, or transferring Anything of Value to state personnel with the intention of securing improper benefits or advantages. It is indisputable that the aforementioned individuals are prohibited from engaging in the aforementioned actions through their relatives or related entities such as holding companies.

If the job responsibilities include interacting with the Public Official, employee are expected to understand and comply with the special laws, rules and regulations that apply to the job position as well as with any applicable standard operating procedures that the Company has implemented. If any doubt exists about whether a course of action is lawful, employee should seek advice immediately from the Integrity Department.

6. Conflict of Interest

All acts of corruption contain an inherent conflict of interest. A conflict of interest occurs when an Employee's private interests interfere (or appear to interfere) in any way with the interest of the Company, or when an Employee action or interest makes it difficult for the Employee to perform his or her work or duties in an objective, unbiased and effective manner. As a general principle, Employees should always be mindful of situations that may give rise to a conflict of interest and endeavor to prevent the occurrence of the same. Employees are responsible for the submission for filing and approval of true and complete declarations of situations that, in their view, have given rise to or may give rise to any conflicts of interest. Identifying potential conflicts of interest may not always be clear-cut, if employee are uncertain whether a particular company is a material customer or supplier, please contact the Integrity Department for assistance.

7. Books and Records

Atour's financial books and records and related credentials must meet applicable financial requirements and must accurately reflect Atour's business and financial affairs. This Policy prohibits Employees from making or authorizing the falsification or

concealment of any books and records that relate to the business of Atour. This Policy also prohibits Employees from using their personal funds to accomplish what Atour prohibits or to circumvent Atour policies and procedures. Books and records include, but are not limited to, transactional information, invoices and payments, expense reports and receipts, and any other financial or business-related records. Off-book funds are strictly prohibited at Atour. Please contact the Integrity Department with any questions concerning any such policy.

8. Roles and Responsibilities of Main Regulatory Authorities

8.1 Integrity Department

The Integrity Department organizes audit of compliance to assess the effectiveness of the internal control system and procedures in preventing and reducing the risk of bribery and corruption. The audit process includes but not limited to FCPA audit to ensure that employees comply with the company's compliance policies, analyze and remedy underlying misconduct, and continuously improve, regular test and review compliance mechanisms. Employees are obligated to cooperate with internal investigations and reviews without interference or obstruction.

The Integrity Department is responsible for receiving reports of conduct or activities that violate this policy and conducting related investigations. If there are reasonable grounds to suspect that the above behavior has occurred or is about to occur in the Group, employees or relevant third parties can report to the Integrity Department through the following channels:

Reporting email: jbyx@yaduo.com

8.2 Professional Ethics Committee

The Professional Ethics Committee is one of the company's highest management organization and dedicated organization for professional ethics management. It is independent of all other departments and is responsible for the following matters throughout the Atour Group:

- Establishment of professional ethics system;
- Handling of cases of violations of professional ethics within the group;
- Suggestions for optimizing the system of relevant departments within the group;
- Other matters that the committee considers relevant to professional ethics and need to be dealt with.

9. Training and Communication

All Employees are responsible for understanding and complying with this Policy. Atour conducts relevant training for all employees (including part-time, temporary, and outsourced workers) to ensure consistent understanding. It includes but not limited to orientation training for new Employees, annual compliance training for all Employees, along with other online and offline trainings. All Employees are required to learn designated training courses, pass the online exam and get certified per calendar year.

Atour conveys positive compliance attitude to employees in response to misconduct. The Integrity Department regularly announces serious violations of discipline and penalty decisions on related employees in order to promote integrity and honesty.

10. Consequences of Non-Compliance

Violation of this Policy may result in disciplinary action, which include termination of employment. Those involved in illegal and criminal acts will be transferred to judicial authorities for processing.

11. Prohibiting Retaliation and Protecting Whistle-blower

All employees have a duty to report any known or suspected violation of this Policy, including any violation of laws, rules, regulations or policies that apply to the Company. Reports of inappropriate conduct or behavior will be treated in strict confidentiality and will be shared only with those who have a need for such information. Atour will not retaliate against, and will not tolerate any retaliation against, those that report suspected inappropriate conduct or behavior in good faith.

Atour has adopted a series of measures to prevent whistle-blowers from being unfairly treated and retaliated due to reporting behavior. The measures include but are not limited to:

- assigning an individual to be responsible for receiving and handling the reported information;
- controlling the system authority and isolating the data of the whistle-blower's identity and reported content; and
- strictly following the principle of minimization, and using a strict distribution mechanism to ensure that the reported content is only known to the necessary investigators.

12. Supplementary Provisions

This Policy is approved by the Board of Directors and becomes effective upon the approval.