Weibo Anti-Bribery and Anti-Corruption Policy

I. Purpose and Scope

Weibo Corporation (hereinafter referred to as the “Company”) adheres to high standards of business conduct and conducts business in a lawful, fair, impartial and honest manner. The Company is committed to complying with applicable anti-bribery and anti-corruption laws and regulations and has zero tolerance for any form of bribery or corruption. To implement the anti-bribery and anti-corruption requirements under the Weibo Employee Code of Conduct, the Company has formulated the Weibo Anti-Bribery and Anti-Corruption Policy (hereinafter referred to as the “Policy”). The Policy sets out the expectations and requirements for all Company employees to comply with anti-bribery and anti-corruption laws and provides guidance on how to identify, avoid and report suspected bribery and corruption, with a view to comprehensively preventing bribery, corruption and other misconduct.

The Policy is formulated in accordance with the Criminal Law of the People’s Republic of China, the U.S. Foreign Corrupt Practices Act (FCPA), and Hong Kong’s Prevention of Bribery Ordinance.

The Policy applies to all directors and employees of the Company, including all full-time and part-time employees. The Company encourages suppliers and business partners to comply with the provisions of the Policy and to formulate their own business ethics-related policies accordingly.

The Audit Committee of the Board of Directors is responsible for setting the overall direction of the Policy, overseeing the Company’s anti-bribery and anti-corruption practices, and reporting regularly to the Board of Directors. The SINA Group Compliance Department is responsible for revising and interpreting the Policy, receiving reports of conduct or activities that violate the Policy, and conducting relevant investigations.

II. Basic Conduct Requirements

No person may, directly or indirectly, offer, promise, authorize, solicit or accept any improper benefit in dealings with government agencies, personnel of state-owned enterprises, customers, advertisers, suppliers, partners, participants in the platform ecosystem or any other third party, for the purpose of obtaining or retaining business opportunities, influencing review decisions, obtaining preferential allocation of resources, circumventing management requirements or securing any other improper benefit.

The Company prohibits any attempt to circumvent the Policy through third parties, intermediaries, consulting arrangements, fictitious services, split payments, off-book payments, false expense claims, return of benefits, private commissions, rebates, assets held through nominees or similar means. Any arrangement that appears lawful but is in substance intended to influence impartial judgment is prohibited under the Policy.

In addition to the specific requirements under the Policy regarding bribery and corruption risks, relevant personnel must also comply with the Company's business ethics requirements relating to conflicts of interest, confidentiality, fair competition, anti-money laundering and insider trading. No person may use his or her position, non-public information or unfair competitive practices to seek personal gain.

Management of Key Risk Scenarios

Bribery and corruption may take many forms. Employees should be alert to potential bribery and corruption risks in specific business activities, including:

(1) Gifts, Hospitality and Other Benefit Arrangements

Employees must not provide gifts or hospitality for the purpose of obtaining improper business benefits. Gifts and hospitality consistent with customary business etiquette may be used to express goodwill and maintain friendly relationships, and the giving and receiving of gifts is a business practice; however, gifts and hospitality must not influence employees' objective and impartial business decisions. Employees are responsible for exercising sound judgment in this regard. All expenses for gifts and hospitality provided on behalf of the Company must be accurately recorded in expense reports.

The Company conducts its business on the principle of “fair dealing.” Accordingly, no employee may accept kickbacks, bribe others, privately accept commissions or receive any other personal benefits.

(2) Facilitation Payments

A facilitation payment means promising, giving or offering anything of value to an individual for the purpose of expediting a service or bypassing a required business process. Facilitation payments may typically take the form of “tips” or “gratuities,” but may also be disguised as additional administrative fees, service fees, permit fees or other extra charges.

Except for fees charged by government entities, the Company prohibits employees from offering, arranging or authorizing any form of facilitation payment to any individual or entity for the purpose of expediting a service or bypassing required business processes.

However, the Company recognizes that, in an emergency where an employee’s health or safety is threatened, it may be necessary to make a facilitation payment to avoid danger to life, physical safety or personal liberty. If such a payment is made, it must be reported immediately to the head of the relevant business unit or the Director of Compliance. Any payment made under such circumstances must be documented and accurately recorded in the Company’s books.

(3) Charitable Donations

The Company actively engages in charitable causes and encourages employees to support and participate in community and other meaningful activities. Donations or sponsorships must be made openly and transparently for genuine public-welfare purposes. Employees may make personal donations to political or charitable organizations, but must clearly state that such donations are made in their individual capacity. Any charitable or public-welfare donation or sponsorship made in the Company’s name must be approved in advance in accordance with the Company’s internal approval procedures.

(4) Doing Business with Third Parties

The Company expects all business partners to uphold and maintain high standards of ethical conduct and to comply with all applicable anti-bribery and anti-corruption laws and regulations when conducting business. The Company will only engage business partners that are capable of and willing to comply with the Policy and applicable anti-bribery and anti-corruption laws and regulations.

(5) Political Contributions

Except as approved in advance by the Company's Chief Executive Officer or Chief Financial Officer, the Company prohibits any employee from directly or indirectly providing funds, assets, sponsorship or other support, on behalf of the Company, to any political party, political organization, candidate or political activity. The Company also prohibits encouraging individual employees to make political contributions in their personal capacity and reimbursing an employee for any political contribution.

Books and Records, Confidentiality and Internal Controls

Accurate and reliable records are crucial to the Company's business and form the basis of its earnings statements, financial reports and other disclosures to the public. The Company's records are a source of essential data that guides business decision-making and strategic planning. Company records include, but are not limited to, accounting information, payroll records, timecards, travel and expense reports, e-mails, financial data, assessment and performance records, electronic documents and all other records maintained in the ordinary course of the Company's business.

All Company records must be complete, accurate and reliable. There is never an acceptable reason to falsify records or make misleading entries. Undisclosed or unrecorded expenditures and receipts, as well as any off-book funds, are strictly prohibited. Employees are responsible for understanding and complying with the Company's record-retention requirements.

The Company maintains a series of sound internal policies and procedures to ensure the effective operation of its internal control system and to prevent and promptly detect potential bribery and corruption. The Internal Audit Department is responsible for conducting a comprehensive internal control audit covering all businesses and operating locations every three years and, as part of this process, conducting annual special supervision and inspections targeting potential bribery and corruption risks.

Consequences of Violations

Any company that violates applicable anti-bribery and anti-corruption laws and regulations may face criminal and civil penalties, as well as reputational damage resulting from corrupt activities. The Company may also incur significant costs in connection with investigations into allegations of corruption and may face civil litigation brought by shareholders, customers and competitors.

Company employees who violate the Policy will be subject to disciplinary action depending on the severity of the violation and may even face criminal and civil penalties.

Third-party business partners that violate the Policy will lose the opportunity to continue cooperating with the Company.

Communications and Training

The SINA Group Compliance Department and relevant departments provide communications and training to all employees (including part-time employees and contractors) on ethical standards, applicable anti-bribery and anti-corruption laws and regulations, and the Policy through the distribution of materials, dedicated training sessions, meeting briefings and other means, ensuring that all employees understand the Policy as it relates to their specific responsibilities. From time to time, the Company also provides business ethics training to suppliers and business partners, working with value chain partners to uphold the principles of integrity, transparency and compliance and to build an integrity-based and sustainable business ecosystem. Training is also provided on the reporting channels set out in the Policy to ensure that employees can proactively report bribery-related violations and provide relevant leads.

III. Consultation and Reporting of Violations

Consultation and Reporting Channels

For any questions regarding the Policy, employees may consult their direct supervisor or the Company’s Compliance Department. The SINA Group Compliance Department provides a reporting hotline and email address and encourages employees, partners and members of the public to report bribery and corruption. Reporting channels include:

- E-mail: compliance@staff.sina.com
- Hotline: 010-58983041

- Mail: SINA Group Compliance Department, 18/F, Building S2, Bund Finance Center, 600 Zhongshan East 2nd Road, Huangpu District, Shanghai (200010)
- In-person visits by appointment and other reporting methods

Following independent verification and investigation of reported information in accordance with the Weibo Complaint and Whistleblowing Investigation and Handling Procedures, the SINA Group Compliance Department will provide feedback on the outcome to non-anonymous whistleblowers.

Whistleblower Protection

The Company accepts anonymous reports and maintains strict confidentiality over whistleblowers' personal information and the contents of reports. Such information must not be disclosed to the subject of the report or unrelated persons, so as to protect whistleblowers' rights and interests. The Company maintains a zero-tolerance policy toward any form of retaliation and may take disciplinary action against responsible persons depending on the severity of the misconduct. At the same time, appropriate rewards may be provided to whistleblowers whose reports help the Company recover significant economic losses.

IV. Supplementary Provisions

Preparation and Interpretation

The Policy is prepared and interpreted by the SINA Group Compliance Department, which is also responsible for overseeing its implementation and reporting on implementation to the Audit Committee and the Board of Directors.

Policy Updates

The Policy will be reviewed annually and updated as appropriate. The latest version of the Policy is disclosed on the Company's official website (https://zh.ir.weibo.com/zh-hans#/ESG-policy).