

Employee's Code of Conduct of Ping An Group

Jan, 2022

Ping An regards risk management as one of its main focuses in operations and business activities, and upholds the principle of “Regulations + 1” to ensure compliant and stable operations, with “1” referring to “one level higher than legally required standard”. Employees of Ping An shall follow the basic guidelines and codes of conduct. Ping An Group’s member companies will take disciplinary action regards employees who violate the requirements of the codes of conduct. Ping An has emphasized the minimum compliance standards and the forbidden work behaviors by specifying “Five Norms” and “12 Bans”, to prevent risks or cases of violations of laws, regulations and discipline. Adhering to the philosophy of “regulated behavior, proper constraint, strong supervision, and effective evaluation” , Ping An sets the goal of “ no one is willing to, dare to, or able to violate codes of conduct” according to relevant law, regulations, regulatory requirements, self-policing rules and company’s actual situation, to further meet the ESG requirements of the China Securities Regulatory Commission and the Stock Exchange of Hong Kong Limited.

| Five Norms

Protection of consumer rights and interests

All employees shall strictly abide by the laws, regulations, regulatory requirements and company rules concerning consumer rights and interests protection. All employees shall provide consumers with products or services by following the principle of voluntariness, equality, fairness, and honesty. All employees shall assume the responsibility and fulfill the legal obligations to protect consumers’ rights and interests.

Strict adherence to laws and regulations

All employees shall strictly abide by laws, regulations, regulatory rules, industry self-regulations, and company rules and regulations, increase the compliance awareness, and consciously resist behaviors that are against laws, regulations, and discipline.

Protection of trade secrets

All employees shall hold in strict confidence the state secrets, business secrets and individual privacy obtained from the work. All employees shall continue to perform confidentiality obligations in accordance with relevant requirements or contracts after their positions changes, resignation, or completion of their work.

Integrity and incorruptibility

All employees shall develop integrity awareness, act with integrity, and resist abuse of power and corruption. They shall improve self-discipline, self-control awareness and capability.

Diligence

All employees shall pledge loyalty to the Company, protect the Company's reputation, and follow company regulations. They shall strictly execute business requirements, operation procedures, and avoidance of conflicts of interest. They shall perform their duties by following the principle of equality, fairness, dedication, and commitment. They shall promptly report matters that may cause conflicts of interest so as to prevent moral hazards.

12 Bans

Criminal offences

Employees are banned from engaging in business of pornography, gambling, drugs, and violence, money laundering, fraud, illegal fund raising, unlawful lending, and other illegal business operations.

Insider trading

Employees are banned from taking advantage of non-public information to conduct the following activities: buy or advise others to buy stocks, sell or advise others to sell stocks, collaborate with other parties or the Company to carry out insider trading and manipulate the stock market, and other forms of activities through which to seek personal benefits.

Mis-selling

Employees are banned from selling and recommending products and relevant information without obtaining sales qualifications and authorization. Employees shall not illegally refer consumer information to the companies and teams owning the products. Employees shall not engage in unauthorized distribution or other unauthorized activities in the name of the Company. Employees shall not use or lend the Company's name, logo, venue, and channel without authorization. Employees shall not market products using misleading, exaggerated information, false advertising, and unlawful promises. Employees are banned from bundling sales against laws or consumer willingness. Employees shall not violate consumers' rights including the right to know, right to choose, and fair trade. Employees shall not sell financial products that are beyond consumers' demand and risk tolerance level.

Bribery and graft

The Company bans commercial bribery, transfer of interest, and solicitation or acceptance of kickbacks. The Company bans acceptance of improper benefits in the form of reimbursement. The Company also bans the acts of receiving and giving gifts with value exceeding the amounts permitted by policies, laws and business practices.

Influence peddling

Employees shall not illegally seize the Company's or related parties' assets, property, and business opportunities through abuse of power, embezzlement, stealing, cheating or other means. Employees shall not abet outside individuals to grab the Company's interests by cheating and signing fake service contracts, and paying unreasonable fees. Employees shall not hold positions or have privilege conflicting with their responsibilities. Employees are banned from concealment, belated reporting, omission, and misstatement of their or their relatives' information, and are also banned from dodging avoidance of conflicts of interest through other illegitimate means. Employees shall neither use their positions to seek personal interests nor engage in activities conflicting with performance of duties.

Misfeasance and fraud

Employees shall not neglect their duties, abuse their power, or seek personal gains by fraud. Employees are banned from setting up “little coffer”, which means hidden assets or off-book accounts. Employees are banned from artificially enhanced performance, inflated profits, tax evasion, and decision-making and approval beyond the power. Employees shall not delay, omit, conceal, or falsely report any major emergencies and risks. Employees shall avoid false records, misleading statements or material omissions in financial statements, accounting reports and information disclosure. Employees shall avoid any misconduct and misfeasance in identification, review, reporting and disclosure of related-party transactions. Employees shall avoid any misconduct and misfeasance in fulfillment of obligations of anti-money laundering, anti-terrorist financing, and anti-tax evasion. Employees shall not transfer transactions that the Company can normally make profit from to others through collusion with relevant institutions or individuals. Employees shall not illegitimately sign, alter or terminate external contracts, or make promises. Employees shall neither falsify or alter official seals, electronic seals or documents, license, certificates, and papers of the Company or external companies, nor use or keep the above mentioned falsified and altered seals, documents, or software.

Transfer of interest

Employees shall not hold concurrent posts (including but not limited to partners, directors, supervisors, managers, officers, agents, and consultants, or provision of any assistance, guidance and services, etc.) in companies or institutions competing or conflicting with the Company. Employees shall not illegitimately run business or engage in commercial activities in competition with the Company. Employees shall not perform duties that may cause conflicts of interest, and shall not hold concurrent posts in companies having conflicts of interest relating to the business in their charge. Employees shall not seek improper benefits by holding concurrent posts. Without authorization, employees shall not violate the procurement discipline to conduct self-dealing, conduct unauthorized procurement and designate suppliers, submit collusive bids, maliciously split amounts, misstate amounts, or transfer other interests. Employees shall not transfer interests to shareholders and other related parties through related-party transactions.

Secret leakage

Employees shall not obtain and use the Company's and other's trade secrets through stealing, inducement, threat, trading or other improper means (copying, saving, taking screenshots, photo shooting, videotaping, printing, duplicating, and online transmission without authorization). Employees shall not leak the Company's and other's trade secrets and personal information in any form (including but not limited to notification, announcement, publication, transmission, authority, transfer, etc.) to any specific or unspecific third parties without authorization.

Infringement of reputation

Employees are banned from posting unlawful information that endangers national security, sabotages national unity, and advocates heresies and superstition via social media accounts or open platforms. Employees are banned from posting rumors, slanderous remarks about regulators or peers, and insulting remarks that disrupt social order and harm social stability. Without the Company's authorization, employees shall not register social media accounts containing the Company's brands, channels, businesses and service brands, and have such accounts identified by the operator. Employees shall not make remarks, accept interviews on behalf of the Company without authorization, or start, spread or circulate improper remarks or rumors, or information. Employees shall not spread improper remarks or rumors via social media accounts or open platforms to damage the reputation of the Company or others.

System sabotage

The Company's IT system accounts, passwords and endpoint privileges (the rights that enable disclosure of internal information to the external through the endpoint) shall not be shared with and lent to others. Employees shall not use external instant messaging tools to transmit documents or important work information without permission. Employees shall not seek personal benefits or damage the Company's interests by attacking or hacking into the Company's IT systems and exploiting flaws in the systems or business processes. Employees shall not hack into or sabotage the Company's computer systems, and shall not install Trojan horses or viruses. Employees are banned from development, installment and use of cheating plug-ins in violation of information security management procedures. Employees shall not access or modify the databases without authorization.

Sexual harassment

Sexual harassment of others against their wills by means of words, texts, images, physical acts is prohibited, including but not limited to: requesting or demanding sexual relations; making sexual remarks; displaying sexually explicit content; unwelcome verbal or physical conduct of a sexual nature. It is forbidden to forcibly persuade or accompany people to drink without respecting individual will in business exchanges, meetings, team building and other activities. It is prohibited to sexually harass individuals in the name of employment, assessment, promotion, reward or punishment by taking advantage of authority or superior/subordinate relationship. Revealing clothing, flirtatious language, intimate behavior and other violations of company etiquette are prohibited. Retaliation against whistleblowers of sexual harassment or person giving relevant information is prohibited.

Others

The Company prohibits payment of salaries, bonuses, allowances, benefits and other remuneration in violation of the remuneration management procedures or remuneration distribution plan, or second payment of the above remuneration in violation of relevant rules. The Company prohibits fake attendance (including but not limited to, asking others to clock him/her in/out, clock in/out other employees, absence after clocking in, and using attendance software not accepted by the Company), or provide and assist in providing false proof of attendance. The Company prohibits ganging-up, extravagance, practice of formalities, and disregard for rules. The Company bans employees from lending business license or other relevant licenses and documents of the Company without authorization.

The policy is interpreted and revised by Ping An Group. The Company will update the policy in line with national policies, regulatory requirements and industry developments.