

Business Code of Conduct

Sept, 2020

Business Code of Conduct

Laws, Rules and Regulations Compliance Statement

Ping An not only abides by laws, rules, and regulations where our businesses operate, but we also pay attention to the effect of our ethical business conduct to our shareholders, customers, employees, partners and community and environment. Ping An has put in place rigorous policies and advance standard closed-loop management for key ESG issues of concern to internal and external stakeholders. As an A+H-share listed company, our enhanced disclosure transparency in this respect provides evidence of our firm commitment to ethical business regarding the environment, society and corporate governance and meets the requirements of ESG disclosure of China Securities Regulatory Committee and the Stock Exchange of Hong Kong Limited..

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1. Tax Policies

Ping An abides by the concept of integrity, law-abiding and compliance in management, to comply with all national tax laws and regulations. We follow the government's tax payment policies, the tax payment system and analyze tax risks and provide information disclosure according to the regulations. We declare and pay tax on time, and work to prevent illegal tax avoidance and tax evasion practices. Tax issues have a high priority at Ping An and we have established professional tax teams at both the group level and member company levels to strengthen tax risk prevention awareness and management control. All tax declarations, tax payments and accounting treatment of tax matters, including business decisions and daily business activities, take into account tax factors and are in accordance with relevant tax laws. Ping An's internal tax risk control management system includes: continuous optimization of internal tax management system, establishment of good risk control environment, establishment of multi-level tax audit system, assurance of tax compliance, regular evaluation of operational effectiveness of tax risk control activities, development of early warning system and tax planning and development of digital tax management system. Ping An works to continuously improvement its systematic management of tax matters. We closely keep abreast of the latest national fiscal and tax laws and regulations. We constantly reinforce and enhance our capability through professional training of tax personnel. For businesses originating from overseas, Ping An uses the applicable tax rate to calculate the tax payable in accordance with existing laws and regulations, interpretations, official guidance and business practices of China and the jurisdiction in which the group is operating in. Group income tax payment amounts are approved by the relevant tax authorities.

2. Anti-trust and Anti-Monopoly

Ping An believes in fair, justified, and open competition to bring maximum benefits to our customers, partners and the society. The company abides by antitrust laws, strictly scrutinizes all mergers and acquisitions transactions and discloses information according to the relevant regulations. Ping An has established an effective monitoring and execution mechanism to ensure the legitimacy of all business operations domestically and abroad. We have strengthened the group's compliance and risk control, and implemented supervising departments to effectively execute internal control and risk management. Ping An implements strict management of charitable donations and sponsorships, discloses the amounts, other particulars and effect of donations and the use of donations through channels such as public reports, news media and official website, and makes sure that donations and sponsorships will not undermine fair business competition. Ping An has also established relevant regulations to ensure fair, legitimate and legal evaluation of mergers, acquisitions and other business deals. At the same time, Ping An will never form monopoly alliances or monopolistic interests group with large-scale competitors, or use predatory pricing as a strategy due to its large market share thus reducing fair competition in the market and violating the relevant anti-monopoly laws and regulations.

3. Anti-Money Laundering, Anti-Terrorist Financing, and Sanctions Compliance

Ping An strictly abides by anti-money laundering, anti-terrorist financing, and sanction related laws and regulations in all businesses and jurisdictions in which it operates. With our legal representative responsible, risk based, and technology enabled management concept, Ping An has built a comprehensive anti-money laundering, anti-terrorist financing and strict sanction control management system to cover all businesses and procedures that is well integrated into the overall Group risk management system. In order to establish a scientific and clear risk management strategy and continuously perfect the internal control regulations and operations, Ping An has published policies such as Anti Money Laundering Management, Guidelines on Monitoring Anti Money Laundering List and Sanctions Compliance Management, according to the relevant laws, regulations and company policies. Ping An will continue to strengthen control procedures and measures such as customer identification and record keeping, large scale and suspicious transaction reporting, customer risk rating, continuous transaction monitoring, risk assessment of institution money laundering and terrorist financing and anti-money laundering list monitoring and control measures. In addition, Ping An continues to build a strong data governance and information security system, strictly comply with data security and confidentiality management requirements, updates the anti-money laundering blacklist and sanction list in real time relying on the data management capability, to make sure the implementation of relevant work in a timely and accurate manner. Ping An constantly enhances compliance culture through internal and external compliance training and establish anti-money laundering inspection and audit, and performance-based reward and punishment mechanism. At the same time, Ping An will continue to develop technology enabled anti-money laundering, anti-terrorist financing and sanctions compliance management, build intelligent anti-money laundering platform and tools, comprehensively improve risk prevention and control capabilities and actively fulfill social responsibility regarding the safeguarding of our customers, society and national financial security.

4. Fairness and Individual Rights Protection

Ping An recognizes that employees are the foundation of the corporation. Therefore, Ping An respects and defends all lawfully protected rights of our employees. Ping An avoids the gender, region, and age discrimination in the areas of personnel management, including hiring, salary and welfare, training and development, promotions, etc. The company opposes the use of child and any kind of forced labor. Ping An rewards employees according to performance based on fair assessment. We believe this lays the foundation for future industry benchmark salary matching. In supplier and purchasing management, Ping An has established regulations such as *Supplier On-site Examination Standards*, *Procurement Supplier Management Policies* and *Supplier Management Regulations* to ensure suppliers' commitment to employee welfare and protection are met without the use of child labor, any kind of forced labor, discrimination and any other individual rights violations. Ping An abides by the concept of fairness, openness, and efficiency during the bidding process, decision process and complaint procedures. Ping An welcomes supplier and customer monitoring for the mutual benefit of all parties. We encourage suppliers and partners to establish fair environmental, social and corporate strategies for a sustainable future. For details, please refer to *Employee and Agent Rights and Benefits Policy* and *Sustainable Supply Chain Policy*.

5. Complaint and Whistleblower Management

In order to further standardize the company's whistle-blower management, the company established *Whistle-blowing Management Procedure* according to relevant laws and regulations and company policies. The company has established a complete handling procedure to supervise, investigate, evaluate and assume its responsibilities to resolve disputes in a timely manner. For those who have made outstanding contributions to the improvement of the company's operations and management shall be awarded according to the *Whistle-blowing Reward Management Method*. With respect to petitioners raising a concern, the petitioner should remain objective, truthful, law abiding and compliant, and shall not disturb the safety of public order. Our Petition handling department takes on cases in a timely, objective and fair manner in accordance with laws to provide the petitioner a fair hearing and an effective process. The whistleblower channel is open to internal and external stakeholders including employees, agents and suppliers. Ping An undertakes to protect the information about whistleblowers from being leaked and protect whistleblowers from unfair dismissal, persecution or retaliation.

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7. Information Management and Social Media Management

Ping An highly values customer information security management. In order to continuously strengthen data risk management, Ping An strictly follows GB/T35273 personal information security specifications, National Network Security requirements and local laws and regulations. The company adopts *minimum authorized* access during business operations, uses de-labeling processing when displaying personal information and adheres to the scope of strict privacy protection requirements. In network and control management, Ping An utilizes end user information leakage response system to actively defend customer information from leaking. The company regularly conducts management reviews and companywide training to ensure continuous protection of customer information security. According to *Social Media Control Policy* of Ping An, all posts issued by official or employee accounts should abide by relevant laws to avoid risks associated with possible violations of laws, and regulations as well as potential finance and brand image consequences. Employees are forbidden to register personal accounts or issue posts with company branding, logo, channel, businesses or other official identifications associated with the company unless authorized by social media management department. Official accounts and employee accounts shall not disclose confidential business information, false information or illegal information. Ping An has established a complete IT management system for computer equipment and regularly conducts company-wide software license compliance checks to avoid infringement risks and information security risks due to use of unauthorized software. For details about information security and customer privacy protection, please refer to *Information Security Management Policy* and *Privacy Protection Statement*.

8. Conflict of Interests, Transfer of Interests and Non-public Information Management

To strengthen employee conflict of interest management, Ping An established *Employee Conflict of Interest Management Policy* according to relevant laws, rules, regulatory requirements and company policies. Employee conflict of interests refers to situations where interests between the employee and the company, customers or investors during the course of their work may cause potential damage to the company, customers or parties. Employees should follow the principles of *risk coverage, voluntary declaration, interest avoidance and zero tolerance* to punish and prevent such conflicts simultaneously. *Employees should fill out the Employee and Regulation Commitment and Employee Conflict of Interest Declaration Form* documents and be informed about *List of Employee Prohibited and Restricted Behaviors*. Ping An formulated the *Affiliate Transactions Management Method* to strengthen the management of interests transfer between companies within Ping An system and between companies and their shareholders. Insider informants and undisclosed informants should strictly abide by the relevant laws and regulations, including the company's *Insider Information Registration System* and *Non-public Information Management Policy* to avoid disclosing any confidential or inside information.

9. Anti-Bribery, Corruption and Fraud

Ping An has always placed a priority on preventing bribery, corruption and fraud. We advocate, promote and strengthen the importance of incorruptible and honest work ethics in daily operations. Ping An hosts company-wide training sessions to all employees, and uses new technologies and management systems to support group and member companies' internal audit, effectively combat financial crimes and fraud. The Group's Anti-fraud System stipulates that the Group shall impose corresponding penalties for acts by Group employees and external personnel of using illegal and irregular means such as deception and accepting kickbacks or rebates to bribe or take bribes, seek improper personal gains, or otherwise damage the legitimate interests of the Company. Once the fraudulent action has been confirmed, the employees are subject to *Red, Yellow, and Blue Card Penalty System* and *Employees' Regulation Violation Policy* for penalties and punishment. To provide assurance for a long lasting and effective governing system, these policies clearly listed out all penalties and punishments with regards to bribery, corruption, fraud, and other financial crimes. At the same time, Ping An implements strict management of charitable donations and sponsorships and makes sure that donations and sponsorships will not cause bribery, corruption or fraud.

Ping An scrutinizes this policy in due course or at least once a year.