



# **Code of Business Conduct for Employees of Lufax Holding Ltd.**

## **General**

The purpose of the *Code of Business Conduct for Employees of Lufax Holding Ltd.* (hereinafter referred to as “the Code”) is to set out the legal and ethical standards for the conduct of employees of Lufax Holding Ltd. and its member companies (hereinafter referred to as “Lufax” or “the Company”). By establishing the Code, the Company aims to regulate business conduct at the employee level and to fully comply with all applicable laws and regulations in the jurisdictions where the Company operates. The Company is committed to operating by and requires all employees to observe and practice the Code in order to help create a stable, safe, fair and just financial market environment.

## **Applicable Scope**

The Code applies to all full-time employees, part-time employees, temporary employees and Board members of Lufax and its subsidiaries, covering all business units of Lufax.

## **Employee Business Ethics Management System**

To regulate the business conduct of employees with well-established provisions, Lufax has formulated and implemented the “Five Prescriptive Norms” and the “Twelve Proscriptive Norms”, emphasising the requirements of “bottom line of compliance” and “red line of conduct”, in order to prevent all types of risks or cases of violations of laws, regulations or disciplines. In addition, the Company also continues to promote the Code of Business Conduct for Employees, and conducts regular anti-corruption, anti-money laundering and other business ethics training for all employees (including part-time) and contractors every year to ensure that all employees of Lufax are aware of, understand and comply with the requirements of the Code and the relevant rules and regulations of the Company. For employees who violate relevant regulations, the Company will implement corresponding measures in accordance with the rules and regulations.

### **1. Five Prescriptive Norms**

- Protect customers’ rights and interests

Employees shall strictly abide by the laws and regulations on consumer rights protection, regulatory requirements and the Company’s policies, follow the principles of voluntarism, equality, fairness and honesty when providing products or services to consumers, and shall effectively assume the responsibility for the protection of the legitimate rights and interests of consumers and fulfil the legal

obligations for the protection of consumer rights and interests.

- Adhere to laws and regulations

Employees shall strictly abide by laws and regulations, regulatory requirements, industry norms as well as the Company's rules and regulations, build a compliance mindset, and consciously resist violations of laws, regulations or disciplines.

- Safeguard trade secrets

Employees shall strictly guard the state secrets, the Company's trade secrets and personal privacy information that they come to know in the course of work. Also, employees shall still fulfil the obligation of confidentiality in accordance with the relevant regulations or contracts after the change, departure or completion of the work they are engaged in.

- Maintain professional integrity

Employees shall practice integrity in their learning, work and exercise of rights, and reject corruption with integrity in mind. In addition, employees shall cultivate and strengthen the awareness as well as the ability of self-discipline and maintain a noble spiritual pursuit.

- Perform with loyalty

Employees shall be devoted to the Company's cause, maintain the Company's reputation, abide by the position-specific norms, strictly implement the business regulations, operating procedures and the requirements of duty-related avoidance, and perform their duties in a fair, impartial, conscientious and best-effort manner. Besides, employees shall take the initiative to declare in a timely manner the matters that may involve the requirements of duty-related avoidance and prevent conflict of interest and moral hazard.

## **2. Twelve Proscriptive Norms**

- Crimes

Employees shall not participate in any criminal activities such as those involving prostitution, gambling, drug abuse, gangs, money laundering, fraud, illegal fund-raising, unlawful loan or illegal business.

- Insider trading

Employees shall not make any illegal use of undisclosed information for equity trading, including advising others on equity trading, facilitating others or the Company to engage in insider trading or manipulate the securities market, or seeking any other private gains.

- Unlawful sales

Employees shall not sell or promote any products before being authorised or delegated to do so or share consumer information to the company or team that owns the product in violation of the law. Also, employees shall not use misleading, exaggerated, false propaganda or illegal promises to market the products, making tie-in or bundling sales in violation of the law or against the will of the consumers, or infringing upon the consumers' lawful rights and interests, such as their right to be informed, to make independent choice, and to receive fair trade. Besides, employees shall not sell to consumers the financial products that are beyond their needs and risk-bearing capacity. Moreover, employees shall not engage in commission sales or other related activities in the name of the Company or using the Company's resources such as the Company's name, logo, premises, channels, etc. without authorisation, and shall not lend the Company's above-mentioned resources to others without authorisation.

- Bribery

Employees shall not engage in commercial bribery for any purpose such as seeking competitive advantage or obtaining business opportunities, or request or accept kickbacks in violation of the law, accept bribes or other undue benefits in the form of reimbursement or others, or accept or give gifts with a value that exceeds the range permitted by the law and business practices.

- Power abuse

Employees shall not embezzle, steal or otherwise illegally take possession of funds, property, and business opportunities of the Company or related parties in their performance of duties, or collude with external personnel to infringe the Company's interests by means of deception, signing false agreements, or making unreasonable payments. Also, employees shall not concurrently occupy positions with conflicting duties or possessing authority in positions that conflict with their own or try to bypass duty-related avoidance review by intentionally failing reporting their own or relatives' information in a timely, complete and accurately manner, or engage in other activities that conflict with the interests of performing their duties.

- Malpractice

Employees shall not commit dereliction of duty, abuse of power, favouritism and malpractice, or establish "private coffer" and hidden account-books, exaggerate performance, fabricate profits, evade taxes, or make decisions or give approval beyond their terms of reference. In addition, employees shall not conceal major emergencies and related risk or intentionally fail reporting such information in a timely, complete and accurate manner. False records, misleading statements or material omissions regarding the financial accounting reports and information

disclosures are prohibited, so are the dereliction of duty and malpractice in the identification, approval, reporting and disclosure of related transactions. There shall be no dereliction of duty or malpractice in fulfilling anti-money laundering, anti-terrorism financing, anti-tax evasion obligations and other related work. Furthermore, employees shall not collude with relevant institutions or personnel to transfer to others businesses that represent profit drivers of the Company under normal circumstances. Also, employees shall not sign, modify or terminate the contract, or make any promise or guarantee to external personnel in violation of regulations. And it is not allowed to forge or alter seals, electronic seals or materials such as official documents, certifications, certificates, letters of the Company and external units, or use or retain the mentioned forged or altered seals, documents, materials, and the software to make them.

- Benefits transfer

Employees shall not take part-time jobs (including but not limited to serving as partners, directors, supervisors, managers, employees, agents, consultants or providing any help, guidance, services, etc.) in companies or institutions that are in competition or business conflict with the Company. Additionally, employees shall not conduct business in violation of regulations or engage in commercial activities that compete with the Company. Further, employees shall not concurrently perform duties that may lead to a conflict of interest or hold concurrent positions in other companies that have conflict of interest with the business they are responsible for or take advantage of part-time positions to seek improper benefits. It is prohibited to conduct self-dealing in violation of procurement disciplines, unauthorized procurement from unapproved suppliers, collusive bidding, bid splitting, and false reporting of the amount or other transfer of benefits, or transfer benefits to shareholders or other related parties through related party transactions.

- Secret leakage

Employees shall not steal or use the Company's or other parties' commercial secrets by theft, bribe, coercion, sale or other improper means (including unauthorised copying, saving, screenshotting, photographing, video recording, printing, photocopying, network transmission, etc.), or disclose the Company's or others' commercial secrets and personal information to specific or unspecified third parties without their consent in any form (including but not limited to informing, announcing, publishing, transmitting, authorising, transferring, etc.).

- Reputational damage

Employees shall not post on social media or any another open platform contents that violate laws and regulations, such as those that endanger national security,

undermine national unity, or promote cults or superstitions. Additionally, in their use of any social media or open platform, employees shall not spread rumours, or contents that could disrupt the social order and destabilize the society, such as those that denigrate regulators or rivals of the Company or insult or slander others. In addition, it is prohibited to register without authorization social media accounts that contain the Company's brand, channel, business, or service brand name. Verifying through the operator official accounts of the Company without authorisation is also prohibited. And it is not allowed to make remarks or accept interviews on behalf of the Company without authorisation, or to make, spread or propagate inappropriate remarks, rumours, and information.

- Insider IT sabotage

Employees shall not share or lend the Company's IT system accounts, passwords and terminal accesses (all accesses that could disclose internal information to the external environment through terminals) to others and are not allowed to use external instant messaging software to transmit files or to communicate important work information without authorisation. Additionally, employees shall not attack or invade the Company's IT system or make use of the system's loopholes or flaws in the business process for profits or to damage the Company's interests, or attack or maliciously damage the Company's computer system, implant Trojans or viruses in the system. Developing, installing or using external programs or software in violation of information security management regulations is prohibited, and it is not allowed to access or modify the database without authorisation.

- Sexual harassment

Employees shall not sexually harass others by words, texts, images, physical behaviours, and other ways, including but not limited to: requesting or soliciting sexual relations, making sexually coloured remarks, displaying pornographic content, and any other undesirable physical, verbal or non-verbal sexual conduct. It is prohibited to forcibly persuade individuals to drink in business occasions, meetings, team building activities, etc. Furthermore, it is prohibited to abuse authority and leader-member relationships to sexually harass others in the name of employment, assessment, promotion, rewards and punishments, etc., or to violate the Company's etiquette rules through improper dressing, words and behaviours. And it is prohibited to retaliate against any person who reports or provides information on sexual harassment incidents.

- Others

Employees shall not pay salaries, bonuses, allowances, benefits and other remunerations in violation of the remuneration management regulations or the distribution plan or carry out secondary distribution in violation of the law or pay

the above-mentioned remunerations in other forms. In addition, employees shall not fake attendance, including but not limited to: asking for or offering buddy punching, punching in and then leaving the office, using unapproved software to fake attendance, or providing or assisting in providing false attendance certificates, etc. Besides, employees shall not perform undesirable work styles such as ganging up, extravagance, formalism, liberalism, etc. And it is not allowed to lend out the Company's business licence as well as other related certificates and documents without authorisation or use them in violation of the law.