



Code of Business Conduct of Lufax Holding Ltd.

General

The purpose of the *Code of Business Conduct of Lufax Holding Ltd.* (hereinafter referred to as “the Code”) is to set out the legal and ethical standards for the business conduct of Lufax Holding Ltd. and its member companies (hereinafter referred to as “Lufax” or the “the Company”). The Company has established the Code to secure compliance with the standards of business conduct and all applicable laws and regulations in the jurisdictions where the Company operates. The Company is committed to complying with and practising the Code 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 members of the Board of Directors of Lufax and its member companies, and covers all business segments of Lufax.

Business Ethics Management System

Lufax is committed to addressing business ethics risks through a robust management structure. The Company’s business ethics conducts are under the guidance and supervision of the Risk Control and Compliance Committee under the Board of Directors. Moreover, the Audit and Supervision Department of the Company conducts internal audit on business ethics and anti-corruption policies across all businesses (including subsidiaries, associates and joint ventures) at least once every three years, and regularly reports the audit findings to the Audit Committee under the Board of Directors. In addition, the Company makes constant efforts in publicity and education regarding integrity, and conducts regular training on anti-corruption, anti-money laundering and other business ethics for all employees (including part-time) and contractors on an annual basis to ensure that employees are familiar with relevant laws, regulations and internal policies.

Tax Policies

Lufax has established the principles and measures for tax management in accordance with laws, regulations and the requirements of regulatory authorities, in particular:

- strictly complying with all national tax laws and government tax policies, and

filing and paying taxes in a timely manner to prevent illegal tax avoidance and tax evasion;

- refining the internal control mechanism for tax risks, and regularly evaluating the effectiveness of tax risk control activities;
- developing and continuously refining the digital tax management system, and continuously improving the systematic full-process management of tax-related matters;
- keeping abreast of and taking the initiative to study the latest national fiscal and tax regulations;
- conducting regular professional training for tax personnel to ensure that relevant employees are familiar with relevant laws, regulations and internal policies;
- adopting applicable tax rates to calculate the tax payable for overseas business in accordance with the applicable laws, interpretative circulars, official guidelines and business practices of China and the jurisdictions where the overseas businesses are conducted.

Antitrust and Fair Trade

Lufax believes that fair, just and open competition underpins maximum benefit for customers, partners and the broader society. The Company strictly abides by antitrust laws and regulations in its business activities, and has established principles and measures for antitrust and fair trade management, in particular:

- establishing effective antitrust monitoring and implementation mechanisms to ensure the compliance of all business operations at home and abroad;
- strengthening the prevention and control of common risks in compliance with antitrust laws and effectively supervising all departments to refine internal control measures and risk control mechanisms;
- strictly managing pro bono donations and sponsorships, disclosing the amount, information and achievement of such donations through public reports, news media, official websites and other channels, and ensuring that relevant donations and supporting activities do not undermine the fairness of commercial competition;
- reviewing the legality and compliance of commercial transactions, such as mergers and acquisitions, through fair and just evaluation, and disclosing information in accordance with standards;

- Promising not to form any monopolistic alliance or interest group with major competitors in the market, nor to utilise its large market share advantage and engage in predatory pricing to undermine fair competition in the market in violation of relevant antitrust laws and regulations.

Anti-corruption and Anti-bribery

Lufax upholds the business values of integrity and fairness, and resolutely stands against corruption, bribery and other conducts violating business ethics. The Company has established three lines of defence against corruption in accordance with anti-corruption and anti-bribery laws and regulations. The first line of defence includes the *Basic Management Measures for Business Personnel*, the *Basic Management Measures for Front-line Personnel in the Distribution Channels* and etc., the second line of defence includes the *Expense Management Measures*, the *Employee Handbook*, and etc. and the third line of defence includes the *Red, Yellow and Blue Cards Punishment Regulations*, the *Anti-Corruption and Anti-bribery Code of Conduct*, the *Internal Audit Policy for Anti-Money Laundering* and etc.



Anti-money Laundering, Counter-terrorism Financing and Sanctions Compliance

Strictly abiding by the laws and regulations for anti-money laundering, counter-terrorism financing and sanctions compliance, Lufax has established and implemented internal policies for anti-money laundering and identification of customer information, such as the *Management Measures for Anti-Money Laundering*, the *Management Guideline for Anti-Money Laundering List Monitoring and Sanctions Compliance*, the *Management Policy for Anti-Money Laundering and Counter-Terrorism Financing* and the *Management Guideline for the Reporting of Suspicious Transactions*, which have established the

management principles and measures for anti-money laundering, anti-terrorism financing and sanctions compliance, in particular:

- establishing an anti-money laundering working group responsible for leading and carrying out the Company's anti-money laundering work;
- carrying out various anti-money laundering work such as compliance list screening, client due diligence, client money laundering risk rating, and investigation on suspicious warnings through the Ping An Dun system;
- strengthening data governance and information system construction, strictly abiding by data security and confidentiality management requirements, and updating anti-money laundering blacklists and sanctions lists in real time by leveraging data management capability;
- conducting due diligence, freezing or taking other control measures for blacklisted clients, and banning relationships with clients on high-risk lists such as terrorism;
- empowering management of anti-money laundering, counter-terrorism financing and sanctions compliance with technology, and building intelligent anti-money laundering platforms and tools, to comprehensively enhance risk prevention and control capabilities.

Fair Procurement

Strictly abiding by the *Sustainable Supply Chain Policy of Ping An Group* and the *Supplier Management Rules for Procurement Business* and other policies, Lufax adheres to the principles of openness, justice, fairness and efficiency in the bidding process, bid evaluation and complaint handling, and is subject to the supervision of suppliers and clients, in a bid to protect the interests of all parties and jointly achieve sustainable development.

Protection of Employees' Rights and Interests

Regarding employees as the most valuable assets, Lufax respects and attaches importance to the legitimate rights and interests of all employees. The Company prohibits any form of discrimination based on gender, geography and age in employee recruitment, compensation and benefits, training and development, career promotion, and prohibits the use of child labour and forced labour.

Whistleblowing Management

This policy is interpreted and revised by Lufax Holding Ltd and will be updated in response to developments in national policies, regulatory requirements and industry practice in due course.

To further standardise the whistleblowing work, Lufax has established the *Whistleblowing Management Policy* in accordance with the relevant laws and regulations and based on the actual situation of the Company, setting out the principles and measures for whistleblowing management, in particular:

- a mechanism for whistleblowing work is established to resolve conflicts and disputes in a timely manner;
- whistleblowers shall submit objective and truthful complaints in accordance with laws and regulations, and shall not disturb public order and security in the process of whistleblowing;
- special protection and confidentiality measures are in place to protect whistleblowers' legitimate interests and protect them from unfair dismissal, persecution or retaliation;
- the department responsible for whistleblowing shall handle complaints in a legal, objective, fair and timely manner, and coordinate with relevant departments for joint investigation and handling to ensure that complaints are handled effectively and appropriately;
- an anti-corruption whistleblowing hotline (0755-22625145) and email (lzxjfb@pingan.com.cn) are available for internal and external complaints (including but not limited to complaints from employees, clients, suppliers, governments and regulators) on non-consumer service matters related to the Company or the Company's employees and agents.

Protection of Intellectual Property

With great importance attached to the protection and management of online and offline intellectual property rights in China and abroad, Lufax strictly abides by the relevant laws, regulations and regulatory documents applicable in the locations of operation, and has established and implemented an array of internal policies such as the *Management Measures for Intellectual Property Rights*, the *Management Measures for Trademark Protection*, the *Management Measures for Patent Protection*, the *Management Measures for Copyright Protection*, and the *Management Measures for Protection of Trade Secrets*, which have set up the principles and measures for the protection and management of intellectual property rights, in particular:

- it is prohibited to infringe on the intellectual property of others while protecting our own intellectual property rights in the course of business operations;

- employees are strictly prohibited from engaging in activities that violate intellectual property rights, including abuse of a dominant position, counterfeiting and piracy, to effectively protect the Company's intangible assets and maintain business order in Lufax's business development sector;
- in the case of an issue involving intellectual property rights, the Company will consult legal counsel and conduct investigations to ensure that our own and others' intellectual property rights are protected and respected.