



中國太平保險控股有限公司

China Taiping Insurance Holdings Company Limited

(Incorporated in Hong Kong with limited liability)

(Stock Code: 966)

**Whistleblowing Policy of
China Taiping Insurance Holdings Company Limited**

Chapter I Introduction

Article 1 China Taiping Insurance Holdings Limited (the “Company”, together with its subsidiaries, the “Group”) has been committed to maintaining good corporate governance, corporate responsibility and high transparency. Accordingly, the Company expects and encourages all directors of the Company and employees of the Group at all levels (collectively, the “Employee(s)”) and those who have business dealings with the Group to report any misconduct, fraud or irregularities (including discrimination and harassment) within the Group.

Article 2 The purpose of the Policy is to:

(1) Encourage Employees and other persons dealing with the Group to report suspected misconduct, fraud or irregularities in their work or dealings with the Group and to provide relevant information.

(2) Provide guidance on how to report possible serious misconduct, fraud or irregularities within the Company.

(3) Assure Employees of reporting issues of serious concern to the Company without fear of adverse consequences or retaliation against them for reporting actions.

Chapter 2 Whistle-Blowing

Article 3 Whistle-blowing refers to the decision of an Employee

and other persons dealing with the Group (such as customers, suppliers, creditors and debtors) (the “Informer(s)”) to report any suspected misconduct, fraud or irregularity within the Group. Such suspected misconduct, fraud or irregularity includes, but is not limited to, illegal/unlawful conduct, unethical acts/practices, other conduct that is contrary to normal business practices, or conduct that places the Group or its Employees or other third parties with whom the Group deals at significant risk.

Chapter 3 Scope of Misconduct, Fraud and Irregularity

Article 4 The Company requires all Employees of the Group to fully observe and comply with the corresponding code of ethics in conducting the Company’s business or dealing with the Company’s affairs. Failure to comply with the code of ethics may constitute a reportable misconduct, fraud or violation.

Article 5 Although the Policy cannot exhaust all serious misconduct, fraud or irregularities under the Policy, it is intended to cover issues that could have a serious impact on the Group, including but not limited to the following:

- (1) Improper conduct or unethical behaviour (e.g., fraud, theft, forgery, bribery and embezzlement, dishonesty, etc.);
- (2) Violation of rules and procedures of the Company;
- (3) Violation of laws, rules and regulations and/or regulatory

requirements;

(4) Criminal offences or illegal activities;

(5) Failure to comply with financial management and reporting requirements;

(6) Failure to adequately protect the Group's information, records and assets;

(7) Engaging in conduct that endangers health and safety or poses a risk to the environment;

(8) Engaging in improper conduct or unethical behaviour that may damage the Group's reputation;

(9) Acting against or retaliating against any Informer who makes a report under the Policy;

(10) Intentional or attempted concealment of information regarding any of the above matters.

Chapter IV Protection of Informer

Article 6 The Company shall respect and endeavour to protect the legitimate rights of the Informer.

Article 7 If any employee of the Group illegally inflicts or threatens to inflict any adverse treatment or retaliation against the Informer, the Group shall deal with it seriously in accordance with the laws and regulations and its internal systems.

Article 8 However, if any informer deliberately/irresponsibly makes false or malicious allegations to the Company, the Company shall take appropriate measures and reserve the right to take appropriate action against any Informer or relevant person to recover any loss or damage caused by the false whistleblowing.

Chapter V Confidentiality

Article 9 The Company shall maintain relevant records for whistle-blowing of misconduct, fraud and irregularities in accordance with the provisions of relevant applicable laws.

Article 10 The Company shall make its best efforts to keep the identity of the Informer confidential while conducting a thorough investigation and taking proper measures in accordance with the provisions of applicable laws. However, in the in-depth investigation of the incidents involved in the whistleblowing, the Company may be required to disclose the identity of the Informer in order to comply with any applicable laws or regulations, any order or directive from any relevant government or regulatory authority (including The Stock Exchange of Hong Kong Limited (the "Stock Exchange") and any court having jurisdiction over the Group. In case of such circumstances, the Company shall endeavour to take feasible and appropriate actions to notify the Informer where conditions permit before his/her identity is or may be disclosed.

Article 11 In order to ensure that the investigation is not affected, the Informer shall keep confidential the facts, circumstances and personnel involved in the whistleblowing.

Article 12 In certain cases, the Company may be required to transfer the case to the relevant law enforcement agency without prior notice to or discussion with the Informer. At that time, it may also be required to disclose the identity of the Informer to the relevant governmental authority.

Chapter VI Whistleblowing Channels

Article 13 The Informer may report to the Audit Committee of the Company in the following manner:

Whistleblowing mailbox: whistleblowing_ac@cнтаiping.com。

Article 14 After receiving the Informer's whistleblowing, the Company shall determine the actions for handling of the whistleblowing and the delegation of authority if appropriate, and may need to arrange to hear the details of the Informer's whistleblowing at a time for the convenience of both parties.

Article 15 Although the Company does not require the Informer to have substantial evidence of material misconduct, fraud or irregularities involved in the whistleblowing, the Informer shall explain the reason for causing his/her concern to the whistleblowing under the Policy.

Chapter VII Anonymous Whistleblowing

Article 16 The Company shall treat the whistleblowing on material misconduct, fraud and irregularities seriously, and expect to conduct serious investigations into potential and actual incidents. If the Informer files his/her case(s) anonymously, the Company may not be able to deal with the matters in the whistleblowing, conduct an appropriate investigation into relevant matters and/or obtain additional information required to do so. Therefore, the Company advocates and encourages the Informer to report with a real name.

Chapter VIII Consistency with Laws and Regulations

Article 17 The Policy shall be read in conjunction with, and be subject to, any relevant laws, rules, regulations, directives or guidelines prescribed or issued by the Stock Exchange or any relevant government or regulatory authority from time to time in relation to the matters governed by the Policy.

Article 18 In the event of any inconsistency or conflict between any of the matters and procedures set out in the Policy and any relevant laws, rules, regulations, directives or guidelines prescribed by the Stock Exchange or any relevant government or regulatory authority, those prescribed by the Stock Exchange or any relevant government or regulatory authority shall prevail.

Chapter IX Amendments to the Policy

Article 19 The Company will monitor the implementation and enforcement of the Policy and the procedures contained herein from time to time, and will be responsible for interpreting, reviewing and amending all the rules and procedures set out in the Policy from time to time. The Policy (or its summary) will be disclosed on the Company's website.