



CODE OF BUSINESS CONDUCT AND ETHICS

JING AN SPECIAL RISKS INSURANCE & REINSURANCE BROKERS INC.
August 2024

JING AN SPECIAL RISKS INSURANCE AND REINSURANCE BROKERS INC. CODE OF BUSINESS CONDUCT AND ETHICS

1. Purpose

The purpose of this Code of Business Conduct and Ethics ("Code") is to promote ethical conduct, ensure compliance with applicable laws and regulations, and guide the behavior of all employees, officers, and directors of Jing An Special Risks Insurance and Reinsurance Brokers Inc. ("JASR" or "the Company"). This Code is integral to maintaining the Company's reputation, trustworthiness, and integrity.

2. Scope

This Code applies to all employees, officers, directors, and agents of JASR, including subsidiaries and affiliates. All are expected to adhere to the principles set forth herein.

3. Compliance with Laws and Regulations

All employees, officers, and directors must comply with all applicable laws, rules, and regulations in every jurisdiction where the Company operates. Any known or suspected violation of applicable laws, rules, or regulations must be promptly reported to the Company's legal department or appropriate compliance officer.

4. Ethical Conduct

Employees, officers, and directors must act with honesty, integrity, and fairness in all business dealings. This includes ensuring that the Company's products, services, and interactions with clients, suppliers, competitors, and government officials are conducted with the highest ethical standards. This includes dealings within the Company and among each and every director, officers and employees.

5. Conflicts of Interest

All employees, officers, and directors must avoid conflicts of interest. A conflict of interest occurs when personal, financial, or other considerations interfere with, or appear to interfere with, an individual's ability to make objective decisions on behalf of the Company. Employees must disclose any potential conflicts of interest to their supervisor, manager, or the compliance department.

6. Insider Trading

Employees, officers, and directors must not use non-public information about the Company or its clients for personal gain. Buying or selling Company securities, or the securities of any other company, based on material non-public information is prohibited.

7. Confidentiality

Employees, officers, and directors must maintain the confidentiality of sensitive information related to the Company, its clients, and its business partners. This obligation extends beyond the termination of employment or directorship.

8. Fair Dealing

Employees, officers, and directors must deal fairly with the Company's clients, suppliers, competitors, and employees. No one may take unfair advantage of others through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice.

9. Protection and Proper Use of Company Assets

Employees, officers, and directors must protect the Company's assets and ensure their efficient use. All Company assets should be used for legitimate business purposes only. Each director, officer, and employee must take into account and safeguard each and every office supplies and equipment.

10. Anti-Corruption and Bribery

The Company strictly prohibits any form of bribery or corruption. Employees, officers, and directors must not offer, give, solicit, or accept any form of bribe, kickback, rebate or other improper payment or advantage to or from any person or organization for the purpose of obtaining or retaining business or securing any improper advantage.

11. Gifts and Entertainment

Offering or accepting gifts or entertainment that could influence, or appear to influence, business decisions or otherwise compromise the Company's integrity is prohibited. Employees must adhere to the Company's policies regarding gifts and entertainment.

12. Dissemination and Awareness

This Code will be properly disseminated to the board, senior management, and employees. The Company will ensure that all employees, officers, and directors are informed of this Code and receive regular training to reinforce its principles.

13. Implementation and Compliance Monitoring

The board of directors is responsible for ensuring the proper and efficient implementation and monitoring of compliance with this Code. Additionally, the board will oversee the implementation and monitoring of compliance with all company internal policies. This oversight ensures that ethical standards and internal guidelines are consistently upheld across the organization.

14. Reporting and Enforcement

Employees, officers, and directors are encouraged to report any violations of this Code, or any illegal or unethical behavior, to their manager, the compliance department, or through the Company's whistleblower hotline. Retaliation against individuals who report such concerns in good faith is strictly prohibited and the Company will guarantee to safeguard the welfare and safety of the individual/s reporting any possible infringes or violations.

15. Disciplinary Actions

Violations of this Code may result in disciplinary action, up to and including termination of employment, as well as civil or criminal penalties as appropriate.

People in positions of authority in violation of this Code of Ethical Conduct, the company shall take disciplinary action based on the Company's Rules and Regulations and other applicable laws and disciplinary measures stipulated in the company's internal regulations and guidelines. Should the said person subject for disciplinary action, disagrees, he or she can file an appeal within 10 days of learning of the punishment by presenting related evidence and a written statement describing in detail the reason for the appeal. The board of directors will review the appeal and make a final decision.

16. Waivers and Amendments

Any waiver of this Code for directors or executive officers may be made only by the Board of Directors and will be promptly disclosed as required by law.

Amendments to this Code must also be approved by the Board of Directors.

17. Acknowledgment

All employees, officers, and directors must acknowledge that they have read, understood, and agree to comply with this Code. The Company will provide periodic training to ensure ongoing adherence.