
Tongcheng Travel Holdings Limited
Measures for Protecting and Rewarding Whistleblowers and Witnesses

Chapter I General Provisions

Article 1 Tongcheng Travel Holdings Limited (“Tongcheng Travel”) always adheres to the value of “Integrity and Honesty – Stand Firm on the Bottom Line, Being Simple and Honest”, actively create a good corporate atmosphere of honesty, diligence and dedication, and always practice high-level ethical standards in all aspects of business operations. These Measures are hereby formulated to strengthen the protection of whistleblowers and witnesses, to encourage the employees, suppliers, partners and other stakeholders to proactively report corruption, duty encroachment and other illegal acts against the interests of Tongcheng Travel, and to promote the culture of integrity and honesty.

Chapter II Reporting Scope

Article 2 Words “report”, “reporting” or “reports” used herein refer to the public exposure and information by any stakeholder of Tongcheng Travel and any of its subsidiaries and consolidated affiliates (collectively, the “Company”) through the reporting channels set forth in Article 3 of the Measures with respect to any possible improper matter concerning the Company, such as violations of the *Sunshine Code of Conduct of Tongcheng Travel* committed by the Company, its employees, Board of Directors and senior management. Among others, the reporting scope including but not limited to the following circumstances:

1. Violations including accepting gifts, offerings, entertainment, and trips in any form from suppliers and partners;
2. Violations detrimental to the Company’s interests, including duty encroachment, theft, embezzlement, misappropriation of the Company’s assets and self-seeking misconducts;
3. Use of position to obtain improper benefits for oneself, interested parties or others;
4. Illegal implementation of connected transactions or violation of conflict of interest provisions;
5. Disclosure of the Company’s secrets;
6. Other acts of corruption or dishonesty;
7. Other acts that harm the interests of the Company;

Chapter III Reporting Channels

Article 3 Whistleblowers (including all employees of the Company and others who have business dealings with the Company such as customers and suppliers) may report to the Company's Discipline Inspection and Supervision Committee or the Environmental, Social and Governance Committee under the Board of Directors, where the independent non-executive directors are in the majority, either in real name or anonymously through the following channels.

1. Discipline Inspection and Supervision Committee:

Tel.: +86 18550500511;

Email: jijian@ly.com;

Correspondence: Discipline Inspection and Supervision Committee, Tongcheng Travel, No. 66, Yunhui Road, Suzhou Industrial Park, Jiangsu Province, People's Republic of China, Postal code: 215000;

Website: <https://moa.17u.cn/platform/jijian/home>;

2. Environmental, Social and Governance Committee under the Board of Directors:

Email: TC-ESGcommittee@ly.com

Chapter IV Protection of Whistleblowers and Witnesses

Article 4 The Company treats any report seriously in accordance with the laws and regulations applicable in the location of business, and strictly follows its investigation process and whistleblower protection process to proactively protect those who make reports in good faith against retaliation.

Article 5 The Company attaches foremost importance to the confidentiality of reporting and investigation. The personal information of whistleblowers and witnesses and all information provided by them are treated in strict confidence. The reporting and investigation process are strictly controlled to prevent information leakage. Anyone who violates confidentiality requirement will be severely and seriously punished.

Article 6 The Company prohibits retaliation of any form against whistleblowers and witnesses. Retaliation of any form will be seriously dealt with. Suspected crimes related to retaliation will be investigated according to the law, and will be sent to judiciary authority for processing.

Article 7 If whistleblowers or witnesses suffer from any form or degree of retaliation, they can report to the Discipline Inspection and Supervision Committee or the Environmental, Social and Governance Committee under the Board of Directors of Tongcheng Travel, and the Company will take appropriate measures to provide appropriate protection for whistleblowers and witnesses.

Chapter V Rewards for Whistleblowers and Witnesses

- Article 8 The Company encourages those in the know to proactively report any corruption truthfully and objectively in their real names, and gives the whistleblowers and witnesses corresponding rewards according to the final investigation results. The rewards are in principle restricted to those who report in real name and testify truthfully.
- Article 9 Reporting violation of the Company's rules and regulations: based on the severity of violations, the whistleblowers will be rewarded RMB500-5,000 if they provide facts, clues and evidence with respect to the violation of discipline or law, and the violation is eventually confirmed and dealt with.
- Article 10 Reporting a suspected crime: based on the severity of the crime, the whistleblowers will be rewarded RMB5,000-50,000 if they provide facts, clues and evidence with respect to the violation of discipline or law, and the criminal case is eventually prosecuted.
- Article 11 The Discipline Inspection and Supervision Committee will pay the reward directly to the whistleblowers and witnesses on the principle of protecting whistleblowers and witnesses pursuant to the reward plan.

Chapter VI Supplementary Provisions

- Article 12 The Environmental, Social and Governance Committee will review this policy in due course to ensure its effectiveness. The Environmental, Social and Governance Committee will discuss any necessary amendment and make amendment suggestion to the Board of Directors, which shall be subject to the approval of the Board of Directors.
- Article 13 These Measures shall come into effect as of the date of the consideration and approval by the Board of Directors.