

Policy Regarding Transactions in YUMC Securities by Executive Officers and Disclosure of Material Nonpublic Information

The following corporate policy applies to transactions in Yum China Holdings Inc. (“YUMC”) securities by those employees designated by YUMC as executive officers covered by this policy (each, an “Executive Officer”). “YUMC securities” include common stock, debt securities, options, rights to purchase or sell such securities (including warrants, puts, calls and straddles) and related derivative securities.

Covered Transactions. Any transaction involving YUMC securities is covered by this policy. **You must obtain pre-clearance approval from the Legal Department for any transaction involving YUMC securities.** Examples of transactions requiring pre-clearance can be found at the end of this document.

Window Periods. While YUMC does not limit transactions to a window period, **you are strongly encouraged to limit your activity to a window period.** A window period typically begins on the second business day following YUMC’s earnings release for a quarter and continues until the date that is four weeks prior to the end of the next quarter (or three weeks, in the case of the window period ending prior to the second quarter). Window periods are subject to early closure at any time.

Material Nonpublic Information. No transaction in YUMC securities may be undertaken, even in a window period, if you possess material nonpublic information concerning YUMC or its subsidiaries. The examples of material information include: internal financial information which departs in any way from what the market would expect; changes in sales, earnings or dividends; an important financing transaction; stock splits or other transactions relating to YUMC stock; mergers, tender offers or acquisitions of other companies, or major purchases or sales of assets; major management changes; sales or purchases by YUMC of its own securities; major litigation; and major transactions with other companies, such as joint ventures or licensing agreements. The only exception to this prohibition is if the transaction is made pursuant to a 10b5-1 plan (discussed below). Material nonpublic information is positive or negative information that is not generally available to the investing public and would affect the decision of a reasonable investor to buy, hold or sell YUMC securities or would affect the price of YUMC securities.

10b5-1 Plans. You may enter into a 10b5-1 plan in which you make advance “irrevocable” directives regarding transactions in YUMC securities over an extended

period of time. You must enter into the 10b5-1 plan during a window period and can exercise no discretion over the plan once it is in place. You must obtain from the Legal Department pre-clearance of any 10b5-1 plan relating to YUMC securities. Since Rule 10b5-1 does not create an exemption for Section 16 of the Securities Exchange Act of 1934 ("Section 16"), the Legal Department must be notified promptly after any transaction executed pursuant to a 10b5-1 plan, and the broker or other person executing the transaction must timely transmit a Form 144 notice. Careful consideration and preparation are necessary to implement a 10b5-1 plan. To utilize a 10b5-1 plan, a minimum of 25,000 options/shares should be covered by the plan. If you have any questions regarding 10b5-1 plans, please contact YUMC's Chief Legal Officer at (86) 21-2407-7777.

Margin Accounts and Pledging. Securities held by an Executive Officer in a margin account or pledged as collateral for a loan may be sold without the Executive Officer's consent by the broker if the Executive Officer fails to meet a margin call or by the lender in foreclosure if the Executive Officer defaults on the loan. A margin or foreclosure sale that occurs when an Executive Officer is aware of material nonpublic information may, under some circumstances, result in unlawful insider trading. Because of this danger, Executive Officers may not hold YUMC securities in a margin account or pledge YUMC securities as collateral for a loan.

Speculative Trading. Speculative trading in YUMC securities, including trading in puts, calls or other hedging or monetization transactions, is prohibited.

Legal Department Pre-Clearance/SEC Reporting. Prior to initiating any transaction in YUMC securities (including executing a 10b5-1 plan), you are required to contact YUMC's Chief Legal Officer. Requests for pre-clearance should be submitted **at least three business days in advance of the proposed transaction** so that the Legal Department may assist you in complying with SEC reporting requirements.

It is important to understand that this policy is designed to help you comply with U.S. federal laws and regulations. Under these laws and regulations, a person who trades while in possession of material nonpublic information is subject to extensive fines and criminal penalties up to and including imprisonment.

The SEC has imposed stringent filing requirements which generally require reporting on a Form 4 within two business days of any acquisition or disposition of YUMC securities. To meet this two-business day requirement, the Legal Department will need to work with your broker to ensure it receives information regarding your transaction. You should conduct all transactions in YUMC securities with brokers that have been authorized by the Legal Department.

Consequences of Late Filings. Any late or delinquent Section 16 filings are required to be reported in our proxy statement in a separate captioned section, naming names. The SEC has been granted broad authority to seek "any equitable relief that may be appropriate or necessary for the benefit of investors" for violations of any provisions of the securities laws. In addition, penalties up to and

including fines and prison time may be imposed. Our compliance procedures are designed to help avoid any late filings.

Your Broker. We recommend that you give a copy of this policy to your broker.

Confidentiality; Disclosure of Material Nonpublic Information. Executive Officers must maintain nonpublic information about YUMC in strict confidence, must not communicate such information to any person outside YUMC or other than on a need to know basis inside YUMC and should refer any questions to YUMC's Chief Legal Officer. Executive Officers who disclose material nonpublic information may be subject to civil and criminal penalties for inappropriately passing information to people who may use it for their benefit, and a "tippee" (*i.e.*, a person not subject to the policy who receives material nonpublic information) who trades while in possession of such information may also be subject to the civil and criminal penalties.

Examples of Transactions Covered by This Policy. A transaction in YUMC securities may be executed only after it is pre-cleared by the Legal Department and provided that you are not in possession of material nonpublic information concerning YUMC. The following are examples of transactions covered by this policy:

1. Open market purchases and sales.
2. Stock plan transactions, including stock option or stock appreciation right exercises, and elections to deliver YUMC stock to pay the option exercise price and/or satisfy the related tax withholding obligations.
3. Intra-plan transfers, cash distributions and/or plan loans that (a) affect your participation in the YUMC Common Stock investment alternative of your 401(k) account under the 401(k) Plan and (b) are not in connection with your retirement or other termination of employment.
4. A gift of YUMC stock.
5. A contribution or transfer of YUMC stock to a trust, even if the trust is indirectly owned by you.
6. Transfers of YUMC stock from direct to indirect or from indirect to direct ownership.