

July 28, 2023

Yinan Hu  
Chief Executive Officer  
Fanhua Inc.  
60/F, Pearl River Tower  
No. 15 West Zhujiang Road  
Guangzhou, Guangdong 510623  
People's Republic of China

Re: Fanhua Inc.  
Amendment No. 1 to

the Annual Report on Form 20-F

Filed May 22, 2023  
Annual Report on

Form 20-F

Filed April 25,

2023

File No. 001-33768

Dear Yinan Hu:

We have reviewed your filing and have the following comments. In some of our comments, we may ask you to provide us with information so we may better understand your disclosure.

Please respond to these comments within ten business days by providing the requested information or advise us as soon as possible when you will respond. If you do not believe our comments apply to your facts and circumstances, please tell us why in your response.

After reviewing your response to these comments, we may have additional comments.

Annual Report on Form 20-F

Item 5. Operating and Financial Review and Prospects, page 76

1. Please revise your Operating and Financial Review and Prospects section in future filings to discuss your financial condition and changes in financial condition for each of the periods presented as required by Item 303(a) of Regulation S-K. Please also refer to the instructions to Item 5 of Form 20-F and SEC Release Nos. 33-6835 and 33-8350. Item 16I. Disclosure Regarding Foreign Jurisdictions that Prevent Inspections, page 124

2. We note your statement that you reviewed the Company's register of members and public  
Yinan Hu  
FirstName  
Fanhua Inc.LastNameYinan Hu  
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July NameFanhua Inc.  
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FirstName LastName  
filings with shareholders, including the Schedule 13D/A filed jointly by Sea Synergy Limited and Mr. Yinan Hu on December 23, 2022 and the Schedule 13G/A filed by Bank of America Corporate Center on February 14, 2023, in connection with your required submission under paragraph (a). Please supplementally describe any additional materials that were reviewed and tell us whether you relied upon any legal opinions or third party certifications such as affidavits as the basis for your submission. In

your response, please  
provide a similarly detailed discussion of the materials reviewed and  
legal opinions or  
third party certifications relied upon in connection with the required  
disclosures under  
paragraphs (b)(2) and (3).

3. In order to clarify the scope of your review, please supplementally  
describe the steps you  
have taken to confirm that none of the members of your board or the  
boards of your  
consolidated foreign operating entities are officials of the Chinese  
Communist Party. For  
instance, please tell us how the board members current or prior  
memberships on, or  
affiliations with, committees of the Chinese Communist Party factored  
into your  
determination. In addition, please tell us whether you have relied  
upon third party  
certifications such as affidavits as the basis for your disclosure.

4. We note that your disclosures pursuant to Items 16I(b)(2), (b)(3) and  
(b)(5) are provided  
for Fanhua Inc. or the consolidated VIEs. We also note that your  
list of subsidiaries and  
affiliated entities in Exhibit 8.1 appears to indicate that you have  
subsidiaries that are not  
included in your VIEs. Please note that Item 16I(b) requires that you  
provide disclosures  
for yourself and your consolidated foreign operating entities,  
including variable interest  
entities or similar structures.

With respect to (b)(2), please supplementally clarify the  
jurisdictions in which your  
consolidated foreign operating entities are organized or  
incorporated and confirm, if  
true, that you have disclosed the percentage of your shares or  
the shares of

your consolidated operating entities owned by governmental  
entities in each foreign  
jurisdiction in which you have consolidated operating entities.

Alternatively, please  
provide this information in your supplemental response.

With respect to (b)(3) and (b)(5), please provide the required  
information for you and

all of your consolidated foreign operating entities in your  
supplemental response.

5. With respect to your disclosure pursuant to Item 16I(b)(5), we note  
that you have included

language that such disclosure is to our knowledge. Please  
supplementally confirm

without qualification, if true, that your articles and the articles of  
your consolidated

foreign operating entities do not contain wording from any charter of  
the Chinese

Communist Party.

Notes to the Consolidated Financial Statements

(e) Accounts receivable and Contract Assets, page F-17

6. Please revise future filings to include your policy for determining  
past-due or delinquency  
status for your accounts receivable and contract assets and your  
policy for recognizing  
write-offs within the allowance for doubtful accounts. Please refer to  
ASC 326-20-50-17.

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7. Please revise future filings to include the disclosures required by  
ASC 606-10-50-9 and

ASC 606-10-50-10 for your contract assets.

We remind you that the company and its management are responsible for  
the accuracy  
and adequacy of their disclosures, notwithstanding any review, comments, action  
or absence of  
action by the staff.

Contact Jimmy McNamara at (202) 551-7349 or Jennifer Thompson at (202)  
551-3737 if  
you have any questions about comments related to your status as a  
Commission-Identified Issuer  
during your mostrecently completed fiscal year.

You may contact William Schroeder at (202) 551-3294 or John Spitz at (202) 551-3484 if you have questions regarding comments on the financial statements and related matters. Please contact Robert Arzonetti at (202) 551-8819 or Tonya Aldave at (202) 551-3601 with any other questions.

FirstName LastNameYinan Hu  
Comapany NameFanhua Inc.

Corporation Finance  
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FirstName LastName

Sincerely,

Division of

Office of Finance