

Key Points on Anti-Bribery and Anti-Corruption Policy at China CITIC Bank

China CITIC Bank Corporation Limited always adheres to enhance the internal management, strictly implement various rules and regulations, enforce disciplinary measures for violations, maintain the order of business management and the reputation of China CITIC Bank, prevent risks, and safeguard the lawful and compliant operation and asset security of China CITIC Bank Corporation Limited (hereinafter referred to as “the Bank”).

I. Applicable Scope

This policy is applicable to any individuals who have concluded the labor contract with the Bank (official employee), any individuals of controlled (participated) companies under the Bank’s management authority, and other persons hired by the Bank or under the agreement concluded with labor dispatch agencies to engage in auxiliary financial services at the Bank, such as part-time employee and contractors.

II. General Principles and Requirements

The Bank strictly complies with the Provisions on the Responsibility System for Fostering Party Integrity and Promoting Clean Governance issued by the CPC Central Committee, and unswervingly pushes forward the undertaking of anti-bribery and anti-corruption. The Secretary of the Party Committee (the chairman of the Bank) serves as the primary person responsible for such undertaking, while the other members of the Party Committee undertake the main leadership responsibility within their respective scope of duties. The Office of Discipline Inspection Commission fulfills its duties of supervision, discipline enforcement, and accountability, fully leveraging its role in ensuring supervision, promoting implementation, and facilitating development. The Bank has formulated the Measures of China CITIC Bank for Handling of Employee Misconducts and the Implementation Measures for Supervision and Discipline Enforcement of the CPC Discipline Inspection Commission of China CITIC Bank Corporation Limited, which specifies the handling measures for employee's conducts, such as bribery, corruption, extortion, fraud, money laundering, and so on. To further standardize the professional conduct

of Bank employees and establish a good culture of integrity, any conducts that violate the Code of Professional Conduct and Ethics for Banking Practitioners are considered as employee's violations and are included in the administrative scope of the Measures of China CITIC Bank for Handling of Employee Misconducts.

III. Areas of Primary Concern and Requirements

1. Personnel Appointments and Removals

Bank employees should consciously abide by personnel discipline and refrain from seeking personal gain in selection and employment activities. No one is allowed to accept money or gifts during employee recruitment, promotion, transfer, professional title evaluation, or job assignments, promise promotions, buy and sell official positions, or engage in nepotism, corruption, and retaliation.

Leaders at all levels must adhere to the principles of integrity and legality in matters involving their spouses, children, other relatives, and close associates, and are forbidden to exploit their authority or position to benefit their relatives and close associates. Specifically, they must not imply, request, or instruct

the promotion of their spouses, children, other relatives, or close associates. They must not solicit or accept sponsorship from subordinate units, loan clients, and other business-related customers for their spouses, children, or other relatives in such activities as traveling abroad, going abroad for family visits, overseas study, and emigration. Additionally, they must not introduce loans, technology development projects, bulk purchases of goods, decoration projects, or sales of goods for their spouses, children, other relatives, or close associates. Furthermore, leaders are prohibited from utilizing the Bank's resources to benefit their spouses, children, or other relatives inappropriately. They must neither obstruct investigations into cases involving their spouses, children, other relatives, or close associates, nor condone or tolerate the misuse of official positions and influence by their spouses, children, or close associates for convenience and illegal private gains, including engaging in business activities, acting as intermediaries, facilitating loans for themselves or others, promoting goods, or accepting cash gifts, negotiable securities, or valuable items.

2. Business Transaction

Bank employees must exercise their powers correctly and refrain from seeking personal improper benefits during business operations. No one is allowed to exceed his/her authority or approve loans without following prescribed procedures, accept money or gifts during employee recruitment, promotion, transfer, professional title evaluation, or job assignments, promise promotions, buy and sell official positions, or engage in nepotism, corruption, and retaliation.

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IV. Content Related to Management Mechanisms

1. Organizational Guarantee

The conduct on integrity defined in the Code of Conduct on Integrity for Employees of China CITIC Bank (Version 2.0, 2012) refers to any conduct by Bank employees that does not harm the interests and image of

the Bank and does not seek undue benefits through their official powers. Bank employees should consciously abide by the code of conduct on integrity and resist commercial bribery. Leaders at all levels should set an example, correctly use their powers, and be exemplary in practicing the integrity.

Leaders at all levels should attach importance to anti-corruption and integrity education, helping employees establish correct worldviews, life philosophies, values, view of power, view of status, and interest view, and consciously abide by Party discipline, national laws, and various regulations and systems.

2. Reporting Mechanism

Petition Reports of Clues to Corruption: The Bank set up a petition report department to take up and manage internal and external tip-offs on all kinds of violations against laws, regulations, and disciplines such as suspected bribery, blackmail, fraud and money laundering by employees of the Bank and made available multiple channels for tip-offs such as letters, phone calls, visits, and emails. Once the violations were proven factual after investigation, related departments would hold the units

or individuals in violations of laws and regulations accountable as their management authority allowed, and transfer those suspected of crimes to judicial authority by law.

Protection of Informants: The Bank has implemented an ironclad confidentiality system that stringently protects the anonymity and the sensitive content of informant reports. This system not only prohibits any form of retaliation against informants or their family members but also actively cracks down on any infringement upon their rights. In doing so, it diligently safeguards the informants' legitimate rights and interests. The Disciplinary Inspection Office of the Bank has established dedicated divisions for case supervision and management as well as a specialized unit for handling petitions. They have filled these roles with full-time personnel specifically tasked with managing and coordinating petition work, clues management, and investigative processes. This integrated framework fosters mutual collaboration and checks and balances between these functions, thereby further enhancing the protection of informants' rights and ensuring their due interests are

maintained.

3. Anti-corruption Training

The Bank launched several electronic courses such as Disciplinary Acts Targeting Three Types of Corruption Cases, the Rules of China CITIC Bank for the Integrity and Self-discipline of Procurement Personnel, Improving Party Conduct, Building Integrity, and Combating Corruption in the New Era, Corruption Crimes in State-Owned Enterprises, and Interpretation and Cases: A Deep Analysis of the Rules on Integrity and Self-discipline of the Communist Party of China at the unified learning platform “e-Enterprise Learning” to all employees in the form of live streaming, online learning, etc.

4. Procurement

Please refer to the ESG section on the Bank’s official website for details on the Key Points on the Anti-Corruption Policy for Suppliers.