

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

China CITIC Bank Corporation Limited (hereinafter referred to as the "Bank") has always adhered to strengthening internal management, strictly complying with relevant laws, regulations, and rules, punishing violations, preventing risks, and ensuring lawful, compliant operations and asset security.

I. Applicable Scope

This policy is applicable to any individuals who have concluded the labor contract with the Bank, 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.

II. General Principles and Requirements

The Bank strictly implements anti-corruption and anti-bribery requirements set forth in such laws and regulations as the *Constitution of the People's Republic of China*, the *Law of the People's Republic of China on Commercial Banks*, the *Company Law of the People's Republic of China*, the *Supervision Law of the People's Republic of China*, the *Regulations on the Implementation of the Supervision Law*

of the People's Republic of China, and the Disciplinary Regulations of the Communist Party of China, and fully complies with the Provisions on the Responsibility System for Fostering Party Integrity and Promoting Clean Governance, resolutely stepping up efforts to improve Party conduct, build a clean government, and fight corruption. The Party Secretary of the Bank serves as the primary responsible person for improving Party conduct and building a clean government, while other Party Committee members assume major leadership responsibilities within their respective areas of responsibility. 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 Code of Conduct on Integrity for Employees of China CITIC Bank, the Measures of China CITIC Bank for Handling of Employee Misconducts, and working procedures for supervision, discipline enforcement, reporting, and clue management, which specify the handling measures for employees' conducts, such as bribery, corruption, extortion, fraud, and money laundering.

To further standardize the professional conduct of the Bank's employees and establish a good culture of integrity, any conduct that violates the *Code of Professional Conduct and Ethics for Banking*

Practitioners is considered an employee's violation and is included in the administrative scope of the *Measures of China CITIC Bank for Handling of Employee Misconducts*. Appropriate disciplinary actions will be taken in accordance with relevant management measures.

III. Areas of Primary Concern and Requirements

1. Personnel Appointments and Removals

The Bank's employees are required to 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 or corruption.

2. Business Transaction

The Bank's employees are required to exercise their powers correctly, maintain strict self-discipline, and remain honest and dedicated in their duties. They are not allowed to abuse their power or position to gain improper personal benefits during business operations. Employees are not permitted to exceed their authority or bypass required procedures when approving or issuing loans, nor should they engage in nepotism or corruption or seek personal gain during bidding or bid processes. Employees are also prohibited from soliciting or accepting cash, bank cards, negotiable securities, payment vouchers,

valuables, etc. from subordinate units, individuals, or any parties related to their exercise of authority.

The Bank has clearly defined the different circumstances of corruption and bribery, including violations of professional conduct, credit risk-related business violations, corporate finance business violations, retail finance business violations, financial market business violations, asset-liability and financial accounting operations violations, and management violations involving branches. Based on the nature of the issues and specific circumstances, the Bank determines appropriate disciplinary actions, including penalties, economic sanctions, and other corrective measures.

IV. Content Related to Management Mechanisms

1. Reporting Mechanism

The Bank has the Complains and Proposals Department, which is responsible for accepting and managing the internal and external reports of various illegal, improper and disciplinary conducts involving Bank employees, such as bribery, corruption, extortion, fraud, and money laundering, with various reporting channels such as letters, calls, visits, and emails. If any violation is verified, the units or individuals engaged in illegal or improper activities should be punished by the relevant departments according to their management authority, and those suspected of crimes will be transferred to judicial

authorities in accordance with the relevant provisions.

Additionally, the Bank will take strict confidential and protective measures for informers, ensuring that they are not subject to retaliation or negative consequences. For further details, please refer to Key Points on Informer Protection Policy at China CITIC Bank available in the ESG section of the Bank's official website.

2. Anti-corruption Training

The Bank provides anti-corruption and integrity e-learning courses for all employees through various platforms such as live broadcasts and online learning on the unified learning platform "eQixue". At the same time, the Bank emphasizes learning from cases, promoting reform and governance through cases. This is reinforced by holding warning education meetings, issuing real-name case analyses, conducting special legal and discipline training, and organizing on-site warning education to further strengthen the ideological and moral defense line against corruption for all leaders and employees.

3. Procurement Management

For further details, please refer to Key Points on Supplier Anti-Corruption Policy available in the ESG section of the Bank's official website.