

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

China CITIC Bank Corporation Limited (hereinafter referred to as “the Bank”) consistently adheres to the principle of comprehensive and strict governance, strictly complying with the relevant laws, regulations, and policy requirements on anti-bribery and anti-corruption in China and the jurisdictions where it operates. The Bank places great emphasis on the ethical conduct and integrity of all its employees as well as third-party suppliers who have business relationships with the Bank. It explicitly prohibits any form of commercial bribery, malpractice for personal gain, and actions that infringe upon the interests of customers and the Bank. The Bank maintains a “zero-tolerance” stance towards all forms of bribery and corruption. It requires all employees to strictly adhere to legal and regulatory boundaries, uphold professional ethics, comply with market rules, and engage in honest and compliant professional practices. The Bank continuously promotes the compliance value proposition of “adhering to compliance, upholding integrity, and abiding by ethical standards” across all employees, levels, and institutions, ensuring it permeates grassroots operations, is embedded in processes, and integrated into job roles.

I. Scope of Application

The anti-bribery and anti-corruption policy is applicable to the Bank and its subsidiaries, as well as to all employees (including those who have signed labor contracts with the Bank, members of the Board of Directors, members of the Board of Supervisors, senior management personnel, and other personnel hired by the Bank or engaged through labor dispatch agencies to provide auxiliary financial services at the Bank).

II. General Principles and Requirements

The Bank requires all employees to consciously engage in honest and compliant professional practices, operate in accordance with the law, comply with regulations, and proactively avoid or declare and recuse themselves from actual or potential conflicts of interest or other vested interests. Employees are resolutely urged to resist irregular acceptance of benefits, abuse of power for personal gain, and illicit transfer of interests. The following behaviors are strictly prohibited for employees:

1. Misappropriating customer or Bank funds through the misuse of their positions and work privileges, engaging in abnormal financial transactions with customers, and seeking illegal gains.

2. Insider trading, commercial bribery, and illegal benefit transfer.

3. Establishing unauthorized “slush funds”, maintaining off-book accounts, or engaging in other behaviors that violate financial management regulations.

4. Engaging in unauthorized part-time work for personal gain, operating businesses, or holding positions in other economic organizations.

5. Reimbursing personal expenses with public funds, using public funds for entertainment or travel, or engaging in other unauthorized consumption of public funds.

The Bank solemnly commits that if any employee is found to have violated the Bank’s anti-bribery and anti-corruption policies, it will immediately halt the improper conduct and initiate an investigation and verification process. Depending on the circumstances, it will issue warnings, announce the issues, and implement corrective measures. Meanwhile, the Bank will hold violators accountable in accordance with its internal policies. For violations involving illegal or criminal activities, the Bank will refer the cases to the judicial authorities in accordance with the law.

III. Areas of Primary Concern and Requirements

(I) Personnel Appointments and Removals

The Bank has established a comprehensive system for the selection, appointment, and management of cadres, rigorously

safeguarding both the entry threshold and procedural integrity in cadre selection and appointment processes, while strengthening routine management and supervision of cadres. In compliance with regulatory requirements, the Bank has issued the *Employee Job-Duty Recusal Management Measures of China CITIC Bank*, stipulating that all employees and their relatives are prohibited from working simultaneously in positions where there exists direct business constraints or conflicting interests between the two parties that could compromise the effectiveness of the Bank's internal control mechanisms. During employee recruitment, internal transfers, temporary postings, secondments, and other personnel movements, as a matter of principle, no new situations requiring recusal should arise. It is strictly prohibited to leverage one's authority or positional influence to seek benefits for the promotion of close relatives or other specific associates. 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.

(II) Credit business

The Bank has established a “three-line defense” risk

management system comprising operating institutions and business management departments, risk management departments, and internal audit and disciplinary inspection departments. It continuously improves the internal control system with clear responsibilities, collaborative division of labor, and mutual checks and balances. Employees are required to exercise their powers correctly and strictly adhere to the following requirements to prevent bribery and corruption risks in the credit field:

1. It is strictly prohibited to seek improper personal benefits in business operation and management activities by leveraging one's authority and position. Loan reviews and approvals must not exceed the authorized limits or bypass prescribed procedures.

2. Employees should adhere to the due diligence requirements for credit operations, comprehensively and truthfully reflecting the content of investigations. It is strictly prohibited to engage in malpractice for personal gain, tacitly approve or participate in customers' fabrications of materials to obtain bank credit, deliberately conceal major risk signals when applying for credit, or artificially interfere with the assessment results of appraisal companies.

3. Employees should strictly implement the requirements for the independence of review and approval. Reviewers should not comply with, cater to, or be directed to issue imprudent or negligent review

opinions. They are prohibited from deliberately concealing or downplaying major risks reflected in investigation reports or from intentionally overlooking violations of national laws, regulatory requirements, or the Bank's prohibitive provisions in credit operations. Approvers should not engage in subjective malicious behaviors such as malpractice for personal gain, collusion with external parties, or other actions that severely disrupt decision-making outcomes. They are also prohibited from issuing imprudent or negligent approval opinions under instruction or direction.

4. Employees should strictly implement loan review and approval procedures. It is strictly prohibited to violate regulations by reviewing and approving credit business through reverse procedures; it is strictly prohibited to violate review and approval disciplines or breach the rules of deliberation for various review and approval committees when reviewing and approving credit business; it is strictly prohibited to exceed authority or disguise overstepping authority in reviewing and approving credit business.

5. Employees should strictly comply with business recusal provisions. It is strictly prohibited to violate the Bank's related-party recusal system or seriously breach the principle of separation of duties, or to offer significantly more favorable credit terms to related parties compared to other similar customers.

6. Prohibition on Soliciting or Accepting Gifts Employees are prohibited from soliciting or accepting cash, bank cards, securities, payment vouchers, valuable items, etc., from subordinate units, individuals, or other entities with which they have official dealings.

(III) Procurement and partner management

1. It is strictly prohibited to bypass the open bidding or invited bidding procedures for projects “subject to mandatory bidding as per law” through various means and instead adopt other procurement methods.

2. Engaging in paid intermediary activities, and defrauding expenses by falsely inflating service/product quantities, budget amounts, or other means is strictly forbidden.

3. It is strictly prohibited to engage in backroom dealings by means such as designating suppliers, disclosing base bid prices, colluding in bidding, etc., in order to seek improper benefits.

4. Leaking confidential procurement-related information such as project budgets, review rules, reviewers, candidate suppliers, project review process and results, and supplier information, which should be kept confidential, is strictly prohibited.

5. Falsifying data, shielding suppliers, or forcibly designating suppliers during selection testing, product acceptance, contract performance, supplier evaluation, and other stages is strictly

prohibited.

6. It is strictly prohibited to instruct or mislead evaluators to issue evaluation opinions that deviate from objectivity and fairness, or to have private contacts with suppliers, thereby reducing the procurement activities to mere formality.

7. Violating relevant work procedures and arbitrarily announcing procurement result information is strictly prohibited.

8. Violating relevant regulations on engineering bidding management by requiring architectural design firms or construction enterprises to lower safety standards or project quality is strictly prohibited.

9. It is strictly prohibited for suppliers to offer gifts or provide assets in any form, including but not limited to cash, prepaid cards, cash gifts, gift vouchers, intermediary fees, kickbacks, commissions, stocks, equity interests, bonds, stock options, various marketable securities and payment vouchers, artworks, and real estate, to procurement personnel or their specific associates, whether by way of gift-giving, lending, or otherwise.

10. It is strictly prohibited for suppliers to pay or reimburse any expenses or debts that should be borne by procurement personnel or their specific associates.

11. Providing procurement personnel or their specific associates

with banquets, entertainment, travel, or any other work-unrelated activities in any form is strictly prohibited.

IV. Management Mechanisms

(I) Organizational Guarantee

The Bank has established a supervisory and management structure for anti-bribery and anti-corruption, featuring collaborative efforts among the Board of Directors, the Board of Supervisors, and the Management. Emphasis is placed on strengthening the construction of supervision, prevention, and control mechanisms. Through regular inspections and joint governance by the Compliance Department, Human Resources Department, Internal Audit Department, and Disciplinary Inspection Department, a closed-loop management process covering the identification, assessment, investigation, and control of bribery and corruption risks has been formed, effectively enhancing the efficiency of anti-bribery and anti-corruption.

(II) Risk Assessment

The Bank conducts annual self-assessments of case risk prevention and control, as well as employee behavior management. The assessment indicators and content include the status of anti-bribery and anti-corruption. Potential issues and management deficiencies are promptly identified and addressed, with relevant

situations reported to the Board of Directors.

(III) Reporting Mechanism

The Bank has the Complaints and Proposals Department, which is responsible for unitedly 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. The Bank has established unobstructed reporting channels, making information on these channels publicly available through its website. Diversified reporting avenues, including letters, phone calls, in-person visits, and emails, have been opened up to ensure that reporting channels remain open and accessible at all times. For any reported leads received, if an investigation confirms the existence of violations, the relevant departments should handle the violating units or individuals in accordance with their management authorities. In cases where illegal or criminal activities are suspected, the matter should be referred to the judicial authorities in accordance with regulations.

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.

(IV) Anti-Bribery and Anti-Corruption Training and Compliance Education

The Bank continuously strengthens compliance education and anti-corruption training for all employees, adhering to an annual Risk and Compliance Culture Season. Through centralized learning sessions, online courses, compliance promotions, and surprise examinations, the Bank consistently communicates the requirements for anti-bribery, anti-corruption, and honest, compliant professional practices to institutions and employees at all levels. Anti-corruption e-courses are published on the unified learning platform “e-Enterprise Learning” for all employees. These courses cover institutional provisions related to anti-bribery and anti-corruption, as well as warning education through typical cases. Additionally, by convening bank-wide warning education conferences, publicly disclosing and analyzing typical cases with real names, conducting specialized legal and disciplinary training, and organizing on-site warning education sessions, the Bank further fortifies the ideological and moral defenses of all cadres and employees against corruption.

(V) 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.

(VI) Management of Employee Behaviors

The Bank has established a grid-based supervisory and management structure for employee behavior, routinely conducting inspections of abnormal behaviors that cover all employees. It intensifies risk inspections in key areas such as credit and wealth management, as well as among key personnel such as customer managers and wealth managers. The Bank promptly identifies, warns about, and addresses violations by employees, including malpractice for personal gain and corruption, thereby preventing employees from engaging in illegal and irregular behaviors such as bribery and corruption.