

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

I. Policy Objectives

In accordance with the Law of the People's Republic of China on Bid Invitation and Bidding, the Regulations on the Law of the People's Republic of China on Bid Invitation and Bidding, the Interim Provisions on Centralized Procurement Management of State-owned Financial Enterprises, and the Procurement Management Measures of CITIC Group Corporation and other regulatory frameworks, and considering the actual business operations of our bank, we have formulated internal regulations such as the Centralized Procurement Management Measures for China CITIC Bank and the Supplier Management Measures of Centralized Procurement for China CITIC Bank, these measures rigorously implement anti-bribery and anti-corruption policies in the field of centralized procurement, continuously strengthen risk control mechanisms, enhance management efficiency, and guard against integrity risks.

II. Applicable Scope

These policy key points are applicable to China CITIC Bank's head office (including the Credit Card Center) and domestic branch offices. Overseas branch offices and subsidiaries shall refer to and implement these policies.

III. Main Content

1. Suppliers participating in centralized procurement projects must have no significant violation records in their business activities over the past three years. They should not be listed as dishonest executors, entities of serious tax violations, or entities of severe dishonesty. Additionally, they must not be included in our bank's list of restricted or canceled suppliers.

2. Suppliers meeting any of the following conditions will be subject to cancellation procedures and be included in the cancellation list: Engaging in serious illegal or non-compliant activities such as commercial bribery or fraud recorded by our bank. Exhibiting severe issues in business reputation or product quality that result in significant economic losses to our bank;

3. Unreasonable conditions that restrict or exclude potential bidders are not allowed: such as specifying

particular patents, trademarks, brands, origins, or suppliers.

4. All departments and individuals are prohibited from disclosing crucial information related to procurement projects or divulging assessor information.

5. Assessors are not permitted to disclose any details of the evaluation process. Strict confidentiality must be maintained regarding the list of assessors, evaluation process, and results.

6. Personnel involved in centralized procurement must adhere to ethical conduct, comply with relevant national laws, regulations, our bank's procurement system provisions, and ethical conduct guidelines. Personnel in charge of procurement are forbidden from colluding with each other to harm the interests of the enterprise, national interests, public interests, and the legitimate rights of other parties. Institutions at all levels are required to enhance ethical education for personnel involved in centralized procurement and consider ethical conduct as a crucial aspect of annual performance appraisal.

7. Any misconduct by personnel involved in centralized

procurement, including leaking bid information or other confidential information related to procurement activities, and engaging in other actions that violate relevant national laws, regulations, and our bank's procurement system provisions, will be subject to disciplinary measures in accordance with the Measures of China CITIC Bank for Handling of Employee Misconducts and other relevant regulations. Serious offenses or suspected criminal will be reported to judicial authorities for legal action.

IV. Work Mechanism

1. Suppliers intending to collaborate with our bank are required to submit basic information and relevant documentation. Upon successful completion of the prescribed review process, the supplier will be added to our bank's supplier database. The materials provided by the supplier include a Letter of Commitment, in which they must pledge: strictly adhere to relevant laws, regulations, and our bank's policies during procurement activities and assume social and environmental responsibilities. In the event of any illegal or non-compliant activities that occur during collaboration with our bank, such as

commercial bribery or fraud, the supplier must unconditionally accept disciplinary measures taken by our bank.

2. During the procurement procedures, including candidate qualification reviews and performance assessments, if our bank identifies instances of serious illegal or unethical conduct, such as commercial bribery or fraud, by the supplier, the bank will take regulatory measures against the supplier and put it in the list of abnormality.

3. Any risks and abnormalities identified during the aforementioned processes will be communicated to relevant procurement stakeholders for risk alert.