

# **Anti-Bribery and Anti-Corruption**

China CITIC Bank strictly adheres to the relevant laws and regulations against bribery and corruption in China and the jurisdictions where it operates. It formulates and continuously improves codes of conduct and norms in the realm of professional ethics, committed to upholding a business environment characterized by integrity, fairness, transparency, and compliance. The Bank places great emphasis on the professional ethics and integrity of all its employees, as well as third-party suppliers with which it has business relationships. It explicitly prohibits any form of commercial bribery, malpractice for personal gain, and behaviors that infringe upon the interests of customers and the Bank. All employees are required to strictly abide by laws and regulations, adhere to professional ethics, comply with market rules, and conduct their work in an honest, compliant manner. The Bank maintains a “zero-tolerance” stance towards all forms of bribery and corruption. Through regular audits and inspections of professional ethics standards, as well as the establishment of diverse channels for reporting complaints and petitions, the Bank fosters a healthy corporate ecosystem marked by integrity and ethical conduct.

## **I. Management Structure**

The Bank has established a governance 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. System Construction

The Bank strictly complies with legal requirements and regulatory guidelines such as the *Law of the People's Republic of China on Commercial Banks*, the *Law of the People's Republic of China on Banking Regulation and Supervision*, and the *Anti-Money Laundering Law of the People's Republic of China*. It continuously improves its institutional framework in the field of anti-bribery and anti-corruption, systematically reviewing existing internal policies and regulations related to anti-bribery and anti-corruption. The Bank has formulated the *Key Points of Anti-Bribery and Anti-Corruption*

*Policies* and disclosed them through official and public channels<sup>1</sup>, clarifying the overall principles, prohibitive provisions on bribery and corruption in key areas of concern, and the supervision and management mechanism. The Bank requires all levels of its institutions, affiliated entities, employees, and labor dispatch personnel to strictly implement these policies, further clarifying the red lines and bottom lines for anti-bribery and anti-corruption, and providing solid guarantees for promoting the Bank's steady and sound operation, as well as sustainable development.

The Bank places great importance on strengthening the management of employee behavior. It has formulated, from a bank-wide perspective, a code of conduct for employees and detailed behavioral guidelines for various business areas. It regularly reviews and revises the *Regulations on Honest and Compliant Professional Conduct for Employees*, the *Measures for the Management of Employee Behavior*, the *Measures for Handling Employee Violations*, and other systems, continuously improving the mechanism for accountability and punishment for violations. In the *Code of Conduct for Employees* and the *Detailed Rules on Prohibited Behaviors for Employees* issued and implemented at all levels of institutions and for

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<sup>1</sup>Please refer to the "Information Disclosure - Rules and Regulations" section in the ESG Zone on the Bank's official website (<http://www.citicbank.com/>).

all employees, the Bank clearly delineates three categories of behavioral boundaries: compliant and law-abiding behaviors to be advocated and followed, improper and aberrant behaviors to be avoided and corrected, and illegal and irregular behaviors to be explicitly prohibited. It emphasizes prohibitions on behaviors such as embezzlement and bribery, infringement upon the interests of customers or the Bank, and the transfer of benefits, strictly regulating employee behavior.

The Bank has implemented special initiatives for the prevention and control of case risks, regularly organizing self-assessments of case risk prevention and control, as well as employee behavior management. It effectively leverages the daily supervisory role of over 3,900 management grids at the head office, branches, and sub-branches, routinely conducting inspections of employee abnormal behaviors, “three inspections and four visits”, and unannounced checks. It places particular emphasis on monitoring and identifying improper financial transactions between employees and employees, employees and customers, employees and third parties, and other entities, promptly taking measures such as investigations and disposals to effectively build a “firewall” against bribery and corruption risks.