China Merchants Bank Co., Ltd.

Key Points of Responsible Procurement Policy

(2025 Version)

I. Objective

To regulate the procurement practices of China Merchants Bank Co., Ltd. (referred to as "CMB" or "the Bank") and to integrate Environmental, Social, and Governance (ESG) principles into supply chain management, the Bank has established and continues to improve a responsible procurement policy based on the *Bidding Law of the People's Republic of China* and the *Interim Provisions on Centralized Procurement Management of State-Owned Financial Enterprises issued* by the Ministry of Finance, as well as other relevant laws, regulations, and policy requirements.

II. Scope of Application

This policy applies to all domestic branches and head office departments of CMB. Overseas institutions and subsidiaries shall implement this policy by reference.

III. Management Requirements

1. Environmental Risk Management

(1) Suppliers are required to integrate green and environmentally friendly concepts into their operations, take measures to prevent and reduce the emission of hazardous substances, and continuously improve their performance in environmental, health, and safety.

(2) The procurement process shall support energy-saving and environmentally friendly products, giving priority to products and services that conserve energy and water, and are recyclable.

2. Social Risk Management

(1) Suppliers shall respect and safeguard the legitimate rights and interests of employees, and comply with applicable laws, regulations, or conventions regarding remuneration and benefits, working hours and leave, and occupational health and safety in their operational regions. Any form of forced labor, child labor, or inhumane treatment of workers is strictly prohibited.

(2) Suppliers shall be committed to building a diverse and inclusive workforce, avoid all forms of discrimination, and refrain from conducting business with organizations that employ child labor.

(3) Suppliers are required to establish and implement a comprehensive data security management policy and technical safeguard measures to protect customer data and trade secrets properly, and to take necessary security measures to prevent information loss, leakage, or unauthorized use.

(4) Suppliers shall respect customers' copyrights, image rights, and intellectual property, and shall not disclose or use such rights without proper authorization.

(5) It is stipulated that active support shall be given to small and medium-sized manufacturing enterprises in procurement, with a commitment to promoting employment and ensuring social stability.

3. Governance Risk Management

(1) Suppliers' business operations shall comply with ethical standards. Suppliers shall establish and implement effective anti-corruption and anti-bribery policies and compliance systems, and shall not engage in fraudulent, corrupt, or otherwise prohibited business practices.

(2) Suppliers shall comply with applicable laws and regulations, fulfill their corporate social responsibilities, and refrain from engaging in any unauthorized or potentially illegal business activities.

(3) Suppliers shall commit to maintaining a fair and open market environment and shall not engage in monopolistic behavior, price manipulation, or other anti-competitive practices.

(4) Suppliers shall promptly disclose any material violations of laws or regulations and significant events

affecting sustainable operations, and shall take appropriate measures to address and remediate such issues to prevent recurrence.

4. Supplier Due Diligence and Oversight

The Bank conducts onboarding and ongoing due diligence on suppliers to assess their compliance with relevant procurement policies and management regulations of the Bank. For key suppliers with long-term cooperation, significant transaction value, or those providing core services, the Bank conducts enhanced supervision and assessment on the compliance and effectiveness of their anti-corruption policies, data security protection measures, and other relevant practices through communication meetings, on-site audits, or third-party assessments, to ensure they meet the Bank's responsible procurement requirements.

5. Supplier Integrity Cooperation Management Regulations

CMB strengthens integrity cooperation with its suppliers, formulates and requires suppliers to sign the *Integrity Co-construction Agreements*. The main provisions of the agreement are as follows.

(1) Suppliers shall consciously comply with all national regulations related to integrity and anti-corruption.

(2) Suppliers shall conduct business through proper channels and are prohibited from offering cash gifts, securities, or other valuables to the Bank's staff.

(3) Suppliers are prohibited from engaging in private discussions or reaching understandings with the Bank's staff regarding business contract negotiations or related matters for personal gain.

(4) Suppliers are prohibited from inviting the Bank's staff to travel or visit high-end commercial entertainment venues under the pretext of business discussions or contract signing.

(5) Suppliers are prohibited from purchasing or providing communication devices, vehicles, home appliances, or high-end office supplies for the Bank's units or individuals.

6. Supplier Whistleblower Management

Suppliers shall report to the Bank's Supervision and Disciplinary Inspection Department if they discover any misconduct by CMB's staff that violates integrity and professional conduct regulations. All reports will be kept strictly confidential.

Supervision Hotline: +86-755-83077046

Supervision Email: jiandushi@cmbchina.com (available 24 hours a day, 7 days a week)

The Bank strictly prohibits any suppression, discrimination, obstruction, retaliation, or false accusations against whistleblowers or their relatives. It is strictly forbidden to forward whistleblowing materials or related information to the reported person or any unrelated party. The Bank will rigorously investigate and penalize any acts that infringe upon the legitimate rights and interests of whistleblowers.

IV. Review and Update

This policy is formulated, interpreted, and revised by China Merchants Bank. The Bank shall periodically review and update this policy in accordance with national policies, regulatory requirements, industry developments, and internal management needs. The English version is the translation of the Chinese version of *China Merchants Bank Co., Ltd. Key Points of Responsible Procurement Policy (2025 Version)*. Should there be any inconsistencies between the Chinese and English versions, the Chinese version shall prevail.