China Merchants Bank Co., Ltd.

Key Points of Anti-Corruption and Anti-Bribery Policy

(2025 Version)

I. Objective

China Merchants Bank Co., Ltd. (referred to as "CMB" or "the Bank") has adhered to comprehensive and rigorous governance of the Bank, and rigorously complies with 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 *Regulation on the Implementation of the Oversight Law of the People's Republic of China*, the *Regulations of the Communist Party of China on Disciplinary Actions*, and other anti-corruption and anti-bribery laws, regulations, and policy requirements applicable within China and in jurisdictions where the Bank operates. The Bank advances an integrated approach to ensure that one dare not corrupt, cannot corrupt, and has no desire to corrupt, and maintains a zero-tolerance stance to bribery and corruption.

II. Scope of Application

1. Institutional Scope

This policy applies to CMB's domestic and overseas branches, the Head Office departments, and all affiliated entities.

2. Personnel Scope

This policy applies to all employees of CMB, including on-duty staff who have signed labor contracts with CMB, as well as other personnel engaged by the Bank or contracted through labor dispatch agencies to provide auxiliary financial services.

III. Key Definitions

1. Corruption: Refers to illegal or criminal acts committed by the Bank's employees who abuse their authority and privileges derived from their professional positions, in violation of relevant laws, regulations, and policy provisions, to obtain personal gain and the benefit of cliques or restricted groups.

2. Bribery: Refers to the acts committed by the Bank's employees, during business activities or while providing financial services to others, offering or accepting property or other improper benefits to others, including but not limited to counterparties, clients, intermediaries, agents, etc., to obtain improper benefits.

3. Facilitation Payments: Refers to the acts committed by the Bank's employees, during business activities or while providing financial services to others, accepting benefits in violation of laws and regulations from clients, intermediaries, brokers, agents, etc., for introducing or

facilitating transactions or buying or selling goods on their behalf, to obtain improper benefits.

IV. Management Mechanism

1. Organizational Structure

The Bank's anti-bribery and anti-corruption efforts are jointly overseen by the Board of Directors and senior management, under the supervision of relevant regulatory authorities to ensure effective organization and implementation of relevant work. The Bank has established a comprehensive management and oversight mechanism. The regulatory authorities, Compliance Department, Risk Management Department, and Internal Audit Department work collaboratively to promptly identify, assess, investigate, and manage potential bribery and corruption risks, ensuring the effective implementation of anti-bribery and anti-corruption policies and requirements.

2. Whistleblowing Platform

The Bank has established an open, transparent, and efficient platform for complaints and whistleblowing. By leveraging internet technologies and digital solutions, the Bank ensures complaint and report channels are accessible, and processes are standardized and promptly handled, and clues are scientifically researched and judged related to corruption, commercial bribery, and other

issues. Review, investigation, and case handling are conducted in strict accordance with institutional requirements to ensure the effective implementation of anti-bribery and anti-corruption efforts.

3. Risk Assessment

CMB conducts annual self-assessments on employee conduct management and case risk exposure, with the assessment scope covering anti-bribery and anti-corruption efforts. These assessments aim to identify potential issues and management deficiencies promptly and implement necessary improvements. Relevant findings and progress are reported to the Board of Directors.

4. Integrity Training

CMB regularly provides compliance education and training to all employees, covering laws and regulations related to anti-bribery and anti-corruption, as well as awareness training through case studies of corruption and bribery. Training is delivered through various formats, including on-site lectures, online courses and testing, achieving precise delivery of compliance education. For key business areas and employees in critical positions, the Bank prepares compliance education textbooks and conducts targeted awareness training activities.

5. Violation Penalties

CMB has established a series of regulations, including the *Handling Measures for Employee Violations and Disciplinary Misconduct at China Merchants Bank*, the *Regulations for Accountability Management of China Merchants Bank*, and the *Measures for Criminal Case Management of China Merchants Bank*. These policies clarify the behaviors that violate integrity and discipline and the handling measures. The most egregious and serious violations are incorporated into the *Ten Rules on Integrity and Discipline of China Merchants Bank*, serving as red lines in the Bank's operations.

6. Performance Evaluation

CMB has strengthened performance evaluations in key areas such as case prevention and control, employee management, and accountability for violations. The Bank has established a comprehensive compliance and internal control assessment system covering all institutions to prevent employees from engaging in bribery, corruption, and other illegal or criminal activities.

V. Key Focus Areas

1. Personnel Appointments and Removals

CMB has established a duty recusal system that clearly defines requirements for family recusal and work recusal to strengthen internal controls and promote clean governance. It strictly prohibits using one's authority or positional influence to seek benefits for close relatives or other specifically related individuals in personnel matters. Any violations of relevant regulations in cadre and personnel matters, such as selection, appointment, recruitment, employment, performance evaluation, promotion, and commendation, will be resolutely investigated and punished.

2. Supplier and Partner Institution Management

CMB has established and continuously improved its supplier management system and authorization management framework, strengthening internal controls in procurement processes and optimizing the hard controls of the procurement management system. The Bank progressively enhances the standardization and professionalism of procurement operations, and rigorously prevents integrity risks in the procurement domain. Employees are strictly prohibited from engaging in the following behaviors.

(1) Use their authority or positional influence to intervene in procurement activities for personal gain improperly or to harm the Bank's interests.

(2) Failing to implement recusal requirements when handling procurement business involving oneself, relatives, or other interested parties.

(3) Concealing related-party relationships with suppliers that shall be disclosed, or recommending and introducing suppliers who are relatives or have interests with oneself to participate in the Bank's procurement business.

(4) Soliciting or accepting rebates, commissions, gifts, cash gifts, prepaid cards, securities, or other benefits from suppliers, interested parties, or individuals.

(5) Accepting dining, travel, fitness, entertainment, or other arrangements that may compromise the fairness of procurement, or participating in commercial activities organized by suppliers or interested parties without authorization.

(6) Borrowing money, vehicles, electronic devices, or other assets from suppliers, interested parties, or individuals.

(7) Reimbursing personal, family, or other related expenses through suppliers, interested parties, or individuals.

(8) Investing in or holding shares of suppliers, holding concurrent positions in suppliers or interested parties, or allowing spouses, children, or their spouses and other specifically related individuals to receive compensation from suppliers or interested parties without performing actual work, or to be paid significantly exceeding standard compensation for equivalent positions.

(9) Engaging in improper financial transactions with suppliers, interested parties, or individuals.

3. Investment and Financing Business

CMB has established a risk management "three lines of defense" system composed of business departments, risk management functional departments, and internal audit departments with clear responsibilities and collaborative division of labor, continuously improving the internal control system and strictly preventing integrity risks in the field of investment and financing. Employees must strictly comply with the following requirements.

(1) Credit officers must conscientiously implement national economic and financial policies, strictly comply with national financial laws and regulations, and the bank's rules and regulations, remain loyal to their duties, be dedicated to their work, be pragmatic and efficient, and uphold integrity and self-discipline.

(2) It is strictly prohibited to illegally assist unqualified clients in fabricating or altering documents to obtain bank financing, or to grant financing with terms, such as amount, duration, interest rate, or collateral, that are obviously more favorable than those offered to other similar clients due to favoritism.

(3) Strictly implement the loan approval system, prohibit unauthorized or disguised approval beyond authorized limits. Strictly forbid collusion with clients to mislead authorized approval bodies in making approval decisions.

(4) Strictly enforce conflict of interest recusal. It is strictly prohibited to extend loans to related parties illegally.

(5) It is strictly prohibited to use one's official position or work-related conveniences in credit business to seek improper benefits for oneself, relatives and friends or other related persons, or to harm the Bank's interests.

4. Philanthropic Donations

CMB strictly adheres to national laws, regulations, and policy requirements in its charitable donations, complying with internal management rules. CMB supports high-quality development of rural revitalization and education, demonstrating care and gratitude to society while promoting harmonious development. CMB practices socialist core values and upholds social ethics,

continuously improving decision-making, implementation, and supervision mechanisms for donation projects. Approval procedures are strictly enforced, operations are standardized, and donation information is disclosed transparently.

Once a donation project is approved, it must be executed strictly in accordance with the donation plan and agreement. No organization or individual shall alter the nature or use of donated assets without authorization, nor shall they misappropriate, divert, or embezzle donated funds and materials in any manner. Any misappropriation, embezzlement, or corruption involving donations will result in severe disciplinary action against responsible personnel in accordance with relevant regulations. Cases suspected of criminal conduct will be referred to judicial authorities.

VI. 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 Anti-Corruption and Anti-Bribery Policy (2025 Version)*. Should there be any

inconsistencies between the Chinese and English versions, the Chinese version shall prevail.