

China Construction Bank
Personal Customer Marketing Policy Overview

Updated in June 2023

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1. Objectives

Objectives of the Policy

The Policy aims to strengthen the management of marketing to personal users/customers across China Construction Bank Corporation (hereinafter referred to as “CCB”), carry out relevant work in a more standard, systematic and professional manner, improve marketing effect, and protect financial consumers’ rights and interests.

Applicable laws and regulations

Laws and regulations

- *Consumer Protection Law of the People’s Republic of China*
- *Advertising Law of the People’s Republic of China*
- *Personal Information Protection Law of the People’s Republic of China*
- *Guidelines of the General Office of the State Council on Strengthening Protection of Financial Consumers’ Rights and Interests*
- *Implementation Measures of the People’s Bank of China for Protecting Financial Consumers’ Rights and Interests*
- *Notice on Further Standardizing Financial Marketing and Publicity*
- *Measures for the Administration of the Protection of Consumer Rights and Interests by Banking and Insurance Institutions*

2. Scope

The Policy is applicable to CCB and its domestic institutions (hereinafter referred to as “institutions”). Subsidiaries may use the Policy as reference.

3. Definitions

Personal user/customer marketing herein means the marketing that is conducted in line with the New Finance development idea to promote the implementation of the retail business development strategy of CCB and meet personal user/customer service needs in the process of creating, promoting, advertising and supplying products and services. Specifically, it includes such marketing procedures as marketing planning and advertising

design, financial marketing and business advertising, event organization and application execution, private domain connection and traffic operation, business opportunity coordination and customer reach, contact interaction and experience feedback, network fission and digital communication, process supervision, monitoring and tracking, effect evaluation, and validation and conclusion.

4. Policy Overview

4.1 Basic regulations

- i. Personal user/customer marketing must comply with laws and regulations and be fact-based. It shall conform to the core values of socialism with Chinese characteristics and the corporate culture of CCB. It shall be positive and promote positive energy of society, meet the people's aspiration for a better life, and attach importance to consumer protection and customer experience.
- ii. Institutions shall not hold marketing campaigns that are illegal or exceed the permitted business scope. During execution, institutions shall perform quality supervision and management to prevent the risk of violation.

4.2 No violation of the basic regulations on marketing contents

- i. Institutions shall not use or use in disguise the national and army flags, anthems and emblems of the People's Republic of China.
- ii. Institutions shall not use or use in disguise the names or images of state organs or the staff of state organs.
- iii. Institutions shall not damage national dignity or interest, leak state secrets, disrupt social stability or national unity, hinder protection of the environment, natural resources or cultural heritage, or harm social or public interests.
- iv. The marketing shall not contain discriminatory expressions about ethnic nationality, race, religion, gender, country, age, etc. that are explicit or implicit or may lead to misunderstanding.
- v. The marketing shall not contain or indicate obscene, pornographic, gambling, superstitious, horrific or violent contents that may jeopardize personal or property safety, harm the physical or psychological health of minors or people with disabilities or leak individual privacy.
- vi. Institutions shall not illegally use exaggerated words like "the most" "top" "No. 1" "super" "first" or words relating to brands and authority or suspected of using false advertising or defrauding or inducing consumers.

4.3 No misleading publicity

- i. Institutions shall not market financial products or services in a deceitful, false, concealing or misleading way.

Institutions shall not quote false or incorrect data or materials or conceal restrictions or exaggerate past performance. Institutions shall not use improper marketing methods such as disguised replacement of concept, false analogy and concealment of hypotheses. Institutions shall not explicitly or implicitly indicate that the financial product is principal-protected, free of risk or return-guaranteed, or promise guaranteed future effect, return or relevant information on non-principle-protected investment financial

products. The obligations actually undertaken shall not be lower than the commitment made to users/customers in the form of advertisement, materials or description in the marketing.

ii. Institutions shall not use public trust in government.

Institutions shall not advertise or promote financial products or services that should be but haven't been approved by or filed with the financial administration. Institutions shall not use the financial administration's review or filing procedures for the financial product or service for misleading publicity that makes customers believe the financial administration has provided guarantee for the financial product or service. Ways to inquire relevant information about the financial product or service shall be provided.

iii. Institutions shall not undermine fair competition.

Institutions shall not slander rivals or damage the reputations of the companies of the same trade by using vicious means such as making up stories or spreading false information or citing negative news or inconclusive hot issues. Institutions shall not use improper rating or ranking for financial advertising. Institutions shall not falsely use or use without authorization the same or similar registered trademarks, front sizes or advertising brochures with others that may confuse users/customers. Institutions shall not use the internet for improper financial advertising or affect the normal use of the internet or mobile terminals by others. Institutions shall not provide or use application programs, hardware, etc. to restrict others' legal advertisements or interfere with users'/customers' independent choices.

4.4 No affecting the users'/customers' right to know

i. Identifiability of marketing contents

If standard terms are used when providing financial products or services to users/customers, institutions shall alert users/customers to identify and discern marketing behaviors using front sizes, symbols, typefaces, colors, marks or other eye-catching and accessible ways that can catch the attention of users/customers. For example, if it is advertisement, there shall be a clear word like "advertisement" in the copywriting. If the advertisement for financial marketing is published in forms like pop-up pages, there shall be a clear "close" sign.

ii. Description of important matters

It's necessary to describe matters that limit users'/customers' rights and those that increase users'/customers' obligations. Regarding fee-charging services, there shall be clear fee information and fee charging standards in the advertising materials, and "fee charging" shall not be intentionally concealed. There shall not be material omissions of fee charging conditions, methods or standards.

iii. Disclosure of key information

The key information that affects consumers' decision-making shall be simple and accessible and shall be disclosed in a normative or standard format or form. It shall call users'/customers' attention to the quantity, interest rates, fees, time limit and way of performance, precautions, risk alerts, dispute resolution and other contents of the financial products or services or marketing campaigns that are of vital interest to users/customers. If the financial marketing campaign is conducted by video or audio, warning and disclaimer information shall be disclosed.

iv. Institutions shall not replace financial consumer education with financial product or service marketing.

4.5 No illegal collection or use of users'/customers' information

i. Institutions shall not collect users'/customers' information without consent

When collecting users'/customers' information after obtaining their consent, institutions shall limit the use of such information to the minimum scope required for marketing purposes and take necessary measures to protect the safety of such information.

Institutions shall use suitable ways specified by laws and regulations for users'/customers to choose for themselves whether they consent to using their information for marketing purposes. Even if users'/customers dissent, institutions shall not refuse to provide them with financial products or services because of that.

ii. Partners' joint protection responsibility

When providing the personal information of users'/customers to partners for marketing purposes, institutions shall notify the user/customer of the third party's name, contact information, marketing approach and type of personal information and obtain the user's'/customer's individual consent. Institutions shall urge partners to effectively protect users'/customers' information and standardize the protection, and to use users'/customers' personal information within the marketing scope agreed by users'/customers. If partners change the use scope of users'/customers' information, institutions shall reobtain users'/customers' consent according to laws and regulations and shall not transfer or use their information without consent.

iii. Institutions shall not use trace data to conduct unauthorized marketing campaigns among personal users'/customers.

4.6 No illegal publishing of marketing information

i. Institutions shall strengthen copyright awareness and obtain effective permits and authorization to use the materials for marketing and promotion. It's forbidden to use without authorization or adapt protected videos, pictures, portraits, music, typefaces, etc. for business advertising, or use authorized TV shows, films or music pieces for advertising, or use the names or images of learning institutions, industry associations, professionals or beneficiaries for recommendation or attestation.

ii. Institutions shall not send marketing information to users'/customers' residences or vehicles without their consent or request. The marketing information that is sent with the consent or request of users'/customers shall clearly state the true identity and contact information of the sender and provide recipients with the ways to refuse to continue to receive the marketing information. Institutions shall standardize automated marketing behaviors and control customer calling, mass sending and internet push in a unified manner to avoid repeated calls and frequent texting to the same consumer within a short period of time.

4.7 Other regulations

Other restrictive regulations stipulated or violations identified by laws and regulations or the financial administration.

5. Implementation and Monitoring

5.1 Review and approval monitoring

All levels institutions shall strengthen system user management, establish and improve the post responsibility system, and strictly execute review and approval procedures before pushing or releasing marketing information to customers to ensure the business marketing complies with laws and regulations.

i. Marketing content production

The marketing content producing institution shall scientifically design marketing contents such as videos, image-text and short messages in line with the principle of compliance and make sure the contents are clear, accurate and easy for customers to understand. The authorized review personnel from the authorized department review the marketing contents based on the business segment they are responsible for and in line with the layer-by-layer and level-by-level review and approval principle.

ii. Marketing content approval

Before releasing the marketing contents, it's necessary to submit them for approval and file them with corresponding business departments to ensure proper consumer protection review.

iii. Release of marketing information

The marketing information releasing institution shall strictly manage the submission, review, reexamination and monitoring procedures according to corresponding system functions and channel management regulations and requirements.

iv. Marketing Inquiry

After the release of marketing information, the detailed instructions for customers to participate in marketing issues shall be marked in prominent positions, and relevant inquiries and complaints can be made through 95533 telephone customer service, online customer service of self-service channel, business outlets and other channels for inquiries and effective communication and resolution of the issues involved. According to the feedback from customers, the agency in charge of marketing issues will make timely adjustments and optimization of specific marketing issues.

5.2 Employee behavior management

i. When marketing specific financial product or service to personal users/customers via corporate social media, employees shall meet relevant qualification management requirements. Employees shall ensure strict compliance and consistency of advertising contents and repost contents that have been approved by review or have already been posted on official channels. The digital contents developed by employees may only be used after approved by review.

ii. Extension marketing shall go through necessary filing or approval procedures with local authorities according to relevant management regulations. The marketing campaigns implemented shall be consistent with the contents put on records. Institutions shall focus on customer relations maintenance and service/product marketing and promotion and respect customers' wishes. Institutions shall not use hard sales, tied-sell irrelevant products or services or circumvent regulatory provisions and requirements.

iii. Marketing personnel shall not use any resource of CCB for personal gain.

5.3 Implementation Monitoring

During execution, the marketing initiating institution shall organize monitoring of the marketing operations of corresponding institution, the outsourcing agency and the marketing platform, collect, sum up and analyze the feedback of customers and the market, track execution effect, and fully perceive the changes in the internal and external environments.

The marketing initiating institution shall dynamically adjust and optimize the contents, channels and forms of marketing based on the feedback obtained from execution monitoring, with the goal of improving customer experience.

The Policy is interpreted and revised by the CCB.

The policy overview is written in simplified Chinese with English version. If there is any difference between the two versions, the simplified Chinese version shall prevail.