

China Construction Bank

Whistleblowing Policy Overview

China Construction Bank Corporation (hereinafter referred to as “CCB”) is committed to implementing the management requirements of strict management, continuously strengthening the management of employee behavior, expanding internal and external supervision and whistleblowing channels, guiding insiders to expose clues of violations of laws and regulations, and strictly protecting whistleblowers.

To this end, CCB has successively introduced a series of whistleblowing policies, including implementing petition letter whistleblowing, encouraging real-name whistleblowing, clarifying false whistleblowing, and rewarding the whistleblowing of violations of laws and regulations, aiming to strengthen the whistleblowing of misconduct, improve professional ethics and integrity, and build a high standard of business ethics.

I. Scope of Applicable Personnel

The above series of policies apply to all employees of CCB (including in-service employees who have signed labor contracts with CCB, members of the Board of Directors, members of the Board of Supervisors, members of the Senior Management, as well as any other workers who are engaged by CCB or have signed agreements with labor dispatch agencies to provide ancillary financial services), customers and suppliers. If the whistleblower discovers that the above-mentioned persons have misconduct, he/she can report through the following relevant channels.

II. Scope of Whistleblowing Events

The scope of whistleblowing events includes but is not limited to the following misconduct:

1. Financial problems, including untrue financial data;
2. Internal control loopholes, including major defects in business processes and systems;

3. Violations of laws, including corruption and bribery;
4. Violations of regulations, including forging credit materials;
5. Misconduct that may occur in other aspects;
6. Any attempt to cover up the above misconduct.

III. Whistleblowing Channels and Methods

CCB provides online and offline channels, including letters, emails, telephones, faxes, and on-site visits. Institutions that accept whistleblowing include departments at all levels such as petition letter department, compliance department, and consumer rights protection department.

CCB accepts anonymous and real-name whistleblowing. At the same time, in order to obtain further whistleblowing materials and enable whistleblowers to follow up on the progress of processing, CCB encourages real-name whistleblowing, that is, using one's real name or designation, and providing clear and accurate identity information or communication contact information for whistleblowing.

IV. Confidentiality of Whistleblowing Information and Protection of Whistleblowers

CCB strictly implements the confidentiality policy of whistleblowing information to effectively protect the confidentiality and legitimate rights and interests of all whistleblowers:

1. The collection, storage, use, processing, transmission, provision and deletion of whistleblowing information follow the principles of legality, propriety, necessity and good faith, and comply with the relevant laws and regulations of the national personal information protection and the relevant policies of CCB information security;
2. The scope of knowledge of whistleblowing handling is controlled, and it is not allowed to privately retain, hide, consult, extract, copy, or carry relevant problem clues and materials;
3. Without the consent of the whistleblower, it is not allowed to disclose the identity

information of the whistleblower and the content of the whistleblowing to anyone other than the staff who has the right to receive or process the whistleblowing;

4. The storage time of the whistleblowing information does not exceed the necessary and appropriate time;

5. Those who prevent others from exposing and whistleblowing, leaking whistleblowing information, retaliating against whistleblowers, and interfering in the handling of the whistleblowing, shall be dealt with in accordance with CCB's policies such as *Measures for the Handling of Employee Violations*, and shall be given sanctions ranging from warning to dismissal according to the nature, impact and consequences of the violations.

V. Handling Procedures for Whistleblowing

CCB, based on facts, taking laws and regulations and internal rules and regulations as the criterion, handles the whistleblowing events in accordance with the prescribed procedures.

CCB coordinates and manages the whistleblowing events received by various channels, arranges special personnel to follow up, registers in a timely manner and follows up the handling process. The acceptance result shall be revealed promptly to the whistleblower who provides the real name (designation), clear and accurate address and contact information. For whistleblowing events that have already been accepted, according to the nature of the events and the scope of personnel involved, and in accordance with the division of duties and management authority, different competent institutions shall handle them.

CCB shall carry out the handling of whistleblowing events in accordance with relevant policy provisions. Major whistleblowing events shall be handed over in a timely manner and prioritized.

CCB implements a recusal policy, and if the person handling the whistleblowing is a close relative of the person involved that may affect the fair handling, he/she must not participate in the handling of the whistleblowing; whistleblowers and other relevant persons can request recusal.

VI. Reward for Whistleblowing and Accountability for False Whistleblowing

CCB actively encourages employees to proactively report all kinds of misconduct. Where a person genuinely reports or actively provides information on improper conduct, promptly resolves risks and reduces or avoids the loss of funds and assets of CCB or customers, the whistleblower shall be given bonuses and rewards, and a commendation shall be circulated.

For false whistleblowing such as false accusations and frame-ups, rumors and slander, and malicious smears, CCB will seriously pursue the responsibility of the whistleblower, clarify the false whistleblowing, and eliminate the negative impact.

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.