

China CITIC Bank
Modern Slavery and Human Trafficking Statement
2024

Introduction

1. This document constitutes the modern slavery and human trafficking statement (the "**Statement**") of China CITIC Bank Corporation Limited (the "**Bank**", or "**CNCB** ") for the financial year beginning 1 January 2024 and ending 31 December 2024.
2. The Bank has a London branch carrying out its business in the UK, and, as the Bank has an annual turnover of over £36 million, it is subject to the UK Modern Slavery Act 2015.
3. The Bank recognises its responsibility and is fully committed to preventing slavery and human trafficking in its corporate activities and its supply chains. The Bank requires its overseas branches strictly to abide by the laws and regulations of the countries (regions) in which they are registered. As such, this Statement should be regarded as reflective of the zero tolerance approach taken by the Bank to modern slavery and human trafficking in its business and supply chains.
4. This statement should be read alongside the Bank's annual Sustainability Reports which provide further detail on how we meet our wider social responsibilities. The report can be accessed through the link: [http://www.citicbank.com/about/investor_1011/notice/hshare/202503/P020250326738949428921.pdf].

Our Business and Supply Chains

5. The Bank was founded in 1987. It is one of the earliest emerging commercial banks established during China's reform and opening-up and also China's first commercial bank participating in financing at both domestic and international financial markets. As a keen contributor to China's economic development, the Bank is renowned at home and abroad for setting up numerous track records in the modern Chinese financial history. As at the end of the reporting period, the Bank had 1,470 outlets in 153 large and medium-sized cities in China and 7 affiliates at home and abroad, namely CITIC International Financial Holdings Limited, CNCB (Hong Kong) Investment Co., Ltd., CITIC Financial Leasing Co., Ltd., CITIC Wealth Management Corporation Limited, CITIC aiBank Corporation Limited, JSC Altyn Bank and Zhejiang Lin'an CITIC Rural Bank Limited.
6. For corporate customers, institutional customers and inter-bank market customers, the Bank offers integrated financial solutions in corporate banking business, international business, financial markets business, institutional banking business, investment banking business, transaction banking business and custody business. For individual customers, the Bank provides diversified financial products and services related to wealth management, private banking, personal credit, credit cards, pension finance and going abroad finance, etc.
7. The Bank has constantly improved its corporate governance and business operation systems and mechanisms, forming an organizational structure characterized by efficient management and professional division of duties. The Bank set up a science-based corporate governance framework comprised of the Board of Directors, the Board of Supervisors, the general meeting of shareholders and the senior management, and integrated overall Party leadership into its corporate governance. According to the principle of separating the front, middle and back offices, the Bank established a matrix management model with the Head Office departments as the

lines and the branches and sub-branches as the arrays.

8. The service suppliers to the Bank include: other banks; non-banking financial institutions; third-party managers and trustees; accounting firms; law firms and other specialised service suppliers in the financial sector; IT contractors; human resources firms and other suppliers of office services such as third-party commercial real estate, cleaning and office supplies.

Relevant Policies

9. As a bank registered in China in accordance with Chinese laws, the Bank observes relevant requirements specified in applicable laws and regulations in all business transactions and economic activities. The policies formulated by the Bank and the employment contracts signed with employees are in compliance with the provisions specified in the Labour Law of the People's Republic of China. The Bank requires its overseas branches strictly to abide by the laws and regulations of the countries (regions) in which they are registered.

10. The Bank has always attached great importance to modern slavery risks and operates the following policies that describe its approach to the identification of modern slavery risks and measures taken to prevent slavery and human trafficking in its business operations:

- **China CITIC Bank Employee Code of Conduct** sets out key principles and specific conduct requirements for all staff members, including adherence to relevant employment laws and contracts; respect and fair treatment of others; right to reject any instructions considered to be illegal, and right to escalate concerns whenever appropriate.
- **China CITIC Bank Employee Conduct Policy** sets out the procedure for managing employee conduct, in particular monitoring, identifying, recording, processing and reporting to ensure that any behaviours which violate the law and the Bank's policies are identified at an early stage and are dealt with appropriately.
- **China CITIC Bank Whistleblowing Policy** requires that all staff members report to management any behaviour which is inconsistent with the **CNCB Employee Code of Conduct**, internal policies or is unlawful, including any concerns about slavery, human trafficking or other human rights abuses.

Throughout 2024 and to the date of this Statement, the management of CNCB has not received reports or concerns regarding slavery or human trafficking in its business operations.

- **China CITIC Bank Outsourcing Policy** requires for control of the employment risk associated with outsourcing and assessment of the qualifications of outsourced staff. The Bank, through the outsourcing provider, carries out a list-based management of outsourced staff, including the determination of qualifications, admission, acceptance and withdrawal.
- **China CITIC Bank Centralized Procurement Policy** sets out centralized purchasing practices across the Bank, publishing details of how procurement is supervised and details of complaints channels.
- **China CITIC Bank Centralized Procurement of Suppliers Policy** establishes the standards expected of suppliers. These include the suppliers' commitment to strictly abide by laws and regulations on anti-money laundering, anti-unfair competition, anti-commercial bribery, bidding and procurement, green procurement, and other laws and regulations as well as the Bank's management regulations, and to eliminate all kinds of illegal and illicit behaviours. The suppliers should abide by laws and regulations and adopt various ways to take on their corporate social and environmental responsibilities

and to eliminate behaviours that violate anti-slavery and human trafficking policies. Additionally the Bank has established a process for undertaking regular assessments and evaluation of suppliers against set risk criteria and any adverse findings will result in enhanced scrutiny of the Bank's dealings with the particular supplier.

- **China CITIC Bank Recruitment Policy and China CITIC Bank Employment Contract Policy** make clear that all employment must comply with the China Labour Law and prevailing local regulations. No recruitment of child labour, including anyone under the age of 16, is permitted.

Modern Slavery Due Diligence Processes and Steps taken to manage risk

Employment

11. The Bank's recruitment process strictly enforces background checks. The checks include, but are not limited to, age, identification, past experience, professional conduct, and evidence of good conduct and ethics. The investigation methods include interviews, indirect inquiries, and reviewing personal files. We strictly prevent any breaches of labour/employment laws, including issues related to slavery and human trafficking.

The Bank has implemented a standard contract template which includes clauses meeting the requirements of relevant laws and regulations, including provisions for working hours, remuneration, allowances, labour protection, and occupational hazard protection, etc.. Salary/wages are subject to minimum requirements established by laws and regulations.

Supply Chain

12. In the previous financial year, the Bank took various measures to assess and manage a diverse range of risks in supply chains, by reviewing Bank's centralized procurement suppliers in accordance with prevailing laws and regulations. A vendor risk disposal mechanism has also been established with assessment, monitoring and management.

The scope of the review of the Bank's centralized procurement suppliers includes whether they have a record of major violations of the law in their business activities, including violations of labour laws, human trafficking, child labour, forced labour and other unlawful acts resulting in the suspension of production and business.

13. The Bank requires suppliers to comply with relevant national laws and regulations; take steps to fulfil corporate, social and environmental responsibilities; and will not accept violations of human rights and modern anti-slavery policies. In the past year the Bank has reviewed its major suppliers and has assessed their compliance and integrity in various respects. The Bank's approach includes refusing to work with any supplier that does not meet the required standards.

Risk Assessment

14. The Bank, as a financial institution incorporated in China, is committed to the principle of strict compliance with the regulatory and legal requirements of China and the regions where its branches are located in its business, transactions and contracts. Given this, the Bank considers that its risk in respect of modern slavery, in all its operating jurisdictions, is low.

Our assessment also demonstrates that the Bank's suppliers are low risk, because they are predominately professional services firms including other banks, non-bank financial institutions, third-party administrators and custodians, accountancy, law

firms, consulting firms, as well as office supplies, special banking equipment, IT equipment and service vendors and outsourcing service providers.

In view of the above, given the industry in which the Bank operates, the Bank's risks associated with slavery and human trafficking are considered to be low.

Training

15. The Bank follows closely regulatory developments in the anti-slavery and human trafficking area. Updated legal advice to ensure full compliance with modern slavery and human trafficking related obligations is always shared with staff in key positions across the major jurisdiction in which the Bank operates, including the United Kingdom. In the last financial year, special training in the areas of procurement and HR compliance was delivered to relevant staff.

Key Performance Indicators (KPIs)

16. In order to assess the effectiveness of the measures taken the Bank will continue to review the following key performance indicators:
- The number and nature of major and minor incidents of non-compliance reported by Compliance or Internal Audit;
 - The number and nature of incidents reported through the Bank's internal incident reporting (Whistle blowing) systems.

The KPI metrics are collected and are considered by the Board of the Bank periodically.

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. It has been approved by the Board of Directors of the Bank.

This Statement will be published on the Bank's website: [<http://www.citicbank.com>].

Signed by:

China CITIC Bank Corporation Limited

Date: 2025.6.27

A handwritten signature in black ink, consisting of stylized Chinese characters, likely representing a senior official of the bank.