



# **China Construction Bank**

## **2026 Semi-annual Sustainable Finance Report**

**July 2026**

# Contents

<b>DECLARATION</b> .....	1
<b>CHAPTER ONE GOVERNANCE</b> .....	4
<b>I Corporate Governance</b> .....	4
<b>II Corporate Behaviour</b> .....	24
<b>CHAPTER TWO ENVIRONMENT</b> .....	41
<b>I Green Finance</b> .....	41
<b>II Financing Environmental Impact</b> .....	51
<b>III Green Operation</b> .....	91
<b>CHAPTER THREE SOCIAL</b> .....	95
<b>I Human Capital Development</b> .....	95
<b>II Protecting Consumer Rights</b> .....	130
<b>III Privacy Protection and Data Security</b> .....	168
<b>IV Access to Finance</b> .....	204
<b>V Charity</b> .....	233

## **DECLARATION**

### **Reporting Compilation Background**

This report aims to present the progress of the Bank's sustainable finance work in the first half of 2026, demonstrate the Bank's exploration and practice of integrating ESG concepts into practical operations and business activities and promoting high-quality and sustainable development, enhance communication with a wide range of stakeholders, and actively respond to the concerns of all stakeholders on important tasks and work progress in the sustainable finance field of the Bank.

### **Reporting Scope**

The scope of this report covers China Construction Bank Corporation and its subsidiaries.

### **Reporting Period**

This report covers the period from 1 January 2026 to 30 June 2026. To ensure consistency in reporting, part of the content may contain information that is beyond the above-mentioned period.

### **Reporting Data**

The data of this report mainly comes from the internal documents and relevant statistics of the Bank.

### **Forms of Release**

This report is published in the electronic format and can be viewed and downloaded on the Bank's official website. This report is written in Chinese and is also available in an English version. Should there be any discrepancy between the two versions, the Chinese version shall prevail.

URL: [https:// www.ccb.com/eng/home/index.shtml](https://www.ccb.com/eng/home/index.shtml)

### **Contact Information**

Address: No. 25, Financial Street, Xicheng District, Beijing

Zip code: 100033

Tel.: 86-10-66215533

Email: [ir@ccb.com](mailto:ir@ccb.com)

## Definition Explanation

In this report, unless the context otherwise requires, the following terms shall have the meanings set out below.

CCB P&C Insurance	CCB Property & Casualty Insurance Co., Ltd.
CCB Private Equity	CCB Private Equity Investment Management Co., Ltd.
CCB Principal Asset Management	CCB Principal Asset Management Co., Ltd.
CCB FinTech	CCB FinTech Co., Ltd.
CCB Consumer Finance	CCB Consumer Finance Co., Ltd.
CCB Financial Leasing	CCB Financial Leasing Co., Ltd.
CCB Wealth Management	CCB Wealth Management Co., Ltd.
CCB Futures	CCB Futures Co., Ltd.
CCB Life	CCB Life Insurance Co., Ltd.
CCB Pension	CCB Pension Management Co., Ltd.
CCB Housing	CCB Housing Services Co., Ltd.
CCB Housing Rental	CCB Housing Rental Private Fund Management Co., Ltd.
CCB Consulting	CCB Engineering Consulting Co., Ltd.
ESG	Environmental, Social and Governance

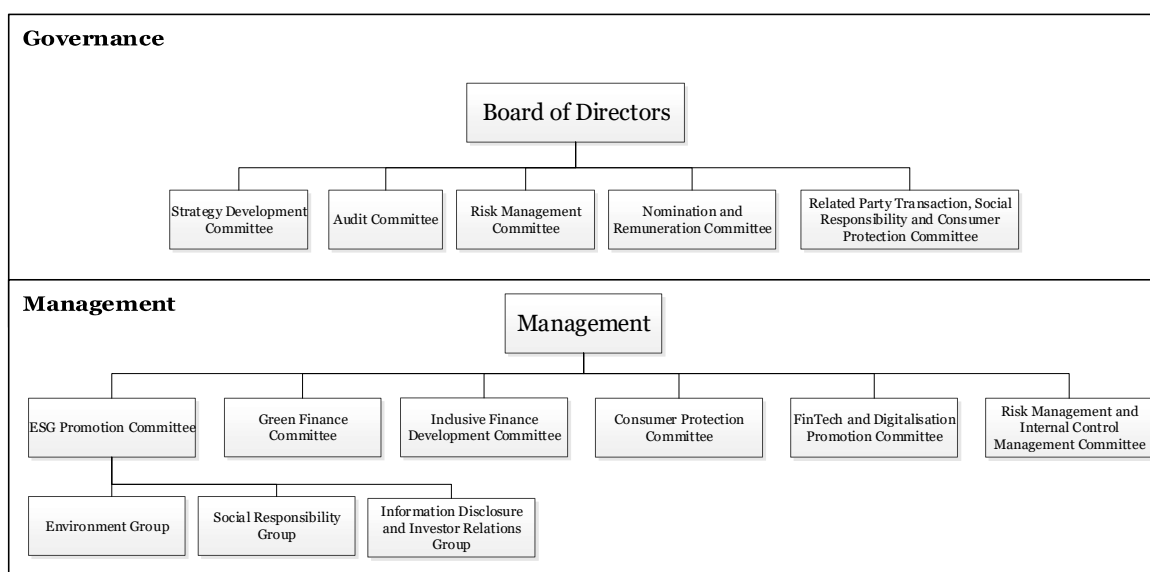
## CHAPTER ONE GOVERNANCE

### I Corporate Governance

In line with the operational management model and business development strategy, the Bank continuously strengthens the construction of the ESG governance system. Based on the structure and functions of the Board of Directors and the Management, the Bank establishes an ESG governance system featuring top-level coordination, vertical penetration, horizontal collaboration, clear delineation of responsibilities, and a well-established framework, effectively promoting the implementation of ESG governance work and providing strong support for achieving the vision of “becoming a world-leading sustainable development bank”.

#### (I) ESG Governance Structure

The Bank’s ESG governance structure is as follows:



#### 1. Board of Directors

##### 1.1 Responsibilities

The Board of Directors of the Bank assumes ultimate responsibility for the formulation and implementation of the Group’s ESG strategy. The Board specifies strategic objectives, key tasks, and management priorities, oversees and evaluates the implementation of ESG strategy, and organises the comprehensive evaluation of the effectiveness of related work. The Board

guides ESG risk identification and assessment, reviews relevant objectives and progress regularly, and provides guidance on improving paths to achieving the objectives. The Board also listens to reports from special committees and the Management on the progress of ESG-related matters and provides guidance on the disclosure of ESG-related information, ensuring that the disclosed information is accurate, complete, and transparent.

The Related Party Transaction, Social Responsibility and Consumer Protection Committee of the Board of Directors is responsible for coordinating and guiding the orderly advancement of ESG management, formulating ESG management policies and strategies, regularly tracking and evaluating the progress, guiding and supervising the corresponding information disclosure. The committee supervises and guides the fulfilment of social responsibility, green finance, inclusive finance, rural revitalisation finance, and related party transactions, and regularly listens to reports on the progress of related work. The committee also guides and urges the establishment and improvement of the consumer protection management system by urging the implementation of related work such as product and service review, complaint management, debt collection management, and fair marketing to guide the strengthening of privacy and data security of personal customers, improving the quality and effectiveness of consumer rights protection.

The Risk Management Committee of the Board of Directors is responsible for overseeing and guiding ESG-related risk management, including climate risk and opportunities. The committee regularly listens to reports on the analysis of environmental and climate-related risks and opportunities to study countermeasures for climate change and advance the in-depth integration of ESG elements into the comprehensive risk management system. The committee continuously refines climate-related risk stress testing and guides the improvement of industry credit policies. The committee also regularly listens to reports on IT risk and cybersecurity risk management to oversee and guide the management of IT and cybersecurity risk control, and reports on innovation management to oversee and guide the review and risk control of product and service innovation.

According to their respective roles, the Strategy Development Committee,

the Audit Committee, and the Nomination and Remuneration Committee of the Board of Directors work together to effectively supervise and guide the Bank's ESG practice. Specifically, the Strategy Development Committee assists the Board in formulating ESG-related strategic objectives and deeply incorporates ESG considerations into all planning and implementation. The Audit Committee regularly listens to reports on internal and external audits, supervises and assesses internal controls, promotes the rectification of ESG-related problems identified in internal and external audits, and continuously improves the soundness and effectiveness of the internal control system. The Nomination and Remuneration Committee attaches great importance to the career development of employees, focusing on training and career development of the Bank's employees.

### **1.2 Diversity of board members**

The Bank places great importance on the diversity of the Board of Directors, continuously improving the Board's professional competence and structure to form a Board that is highly aligned with the Bank's development, consolidate the foundation for long-term and stable development, and ensure strong support for efficient operation and scientific decision-making of the Board.

The Bank formulates the diversity policy of board members. When nominating directors, the Board of Directors takes into account both professional competence and integrity, while fully considering the factor of complementarity, and selects individuals with diverse backgrounds in terms of gender, age, region, culture, and educational background, as well as knowledge and professional experience across different industries and fields. The final selection of candidates is based on their comprehensive abilities and potential contributions to the Board of Directors. The Nomination and Remuneration Committee is responsible for overseeing the implementation of the diversity policy of board members.

As of the end of June 2026, the Board of Directors consisted of 15 members, including four executive directors, six non-executive directors, and five independent non-executive directors. Among them, there were four female directors, accounting for 26.7% of the Board. The independent non-executive

directors are from various regions, including Chinese Mainland, the Hong Kong SAR of China, the Macau SAR of China, North America and Europe, and are well-versed in international and China's accounting standards, capital supervision, securities supervision, and financial market operations. The Audit Committee, the Risk Management Committee, the Nomination and Remuneration Committee, and the Related Party Transaction, Social Responsibility and Consumer Protection Committee of the Board are all chaired by independent non-executive directors. The composition of the Board complies with the gender diversity requirements for board members set out by the Listing Rules of the Hong Kong Stock Exchange and aligns with the diversity policy of board members.

### **1.3 ESG-related expertise of board members**

The board members of the Bank possess extensive experience and a high degree of professionalism in banking-related fields. They have accumulated rich professional knowledge and practical experience in strategic planning, economic research, state-owned capital management, risk prevention and control, and financial accounting management, which provides strategic guidance for the Bank's sustainable development.

Among the non-executive directors and independent non-executive directors of the Bank, eight members have worked for financial supervisory government departments and international organisations related to risk management, such as the Ministry of Finance of the People's Republic of China, the People's Bank of China, the State Administration of Foreign Exchange of the People's Republic of China, the China Securities Regulatory Commission, the HM Treasury, the International Organization of Securities Commissions, the Basel Committee on Banking Supervision, and the International Monetary Fund. Four members formerly held positions in financial accounting-related institutions, such as the IFRS Advisory Council, the International Accounting Standards Board, KPMG, and Deloitte. Five members had industry experience in domestic and international financial institutions, including Industrial and Commercial Bank of China, Bank of China, China Merchants Bank, China Great Wall AMC, JPMorgan Chase, and Citibank.

The board members of the Bank have extensive experience in risk management and climate-related risk management.

Mr. Antony Kam Chung Leung has many years of experience in government and financial institutions. He served as Financial Secretary of the Hong Kong SAR, chairman of the risk management committee of the Board of ICBC, an independent non-executive director of China Merchants Bank and AIA (Hong Kong), chairman of Greater China of Blackstone and a member of investment committee, chairman of Asia for JP Morgan Chase and a member of the credit management committee, head of Private Banking for Asia, Investment Banking, Treasury Department and Greater China Region of Citi, chairman of the asset and liability management committee, member of the credit management committee and senior risk manager of Citibank, with rich experience in risk management of financial institutions.

Mr. William Coen served as Secretary General of the Basel Committee, during which time he led a working group to explore regulatory policies for climate-related financial risks, and conducted extensive research in the banking sector, laying a foundation for the policy documents by the Basel Committee, such as the *Principles for the Effective Management and Supervision of Climate-related Financial Risks* issued in 2022. Mr. William Coen is an experienced risk manager who previously worked for an NYC-based financial institution, responsible for business strategies, origination, and underwriting of retail credit and residential mortgage. He has participated in the development of the Basel III global regulatory requirements for managing credit risk, operational risk, market risk and model risk, and has in-depth knowledge of regulators' expectations related to risk management.

Lord Sassoon has extensive ESG experience, including of climate risk management. This experience derives from Lord Sassoon's long career as a banker, Treasury official and minister in the UK, and as a director of listed companies in Asia and Europe. He currently sits on boards of listed companies in China, the EU and UK, including being a member of the risk committee of a UK bank.

Mr. Lin Zhijun is currently the Senior Advisor to the President, Professor

and PhD Supervisor of the Macau University of Science and Technology. In terms of ESG research, he has organised and hosted a number of academic annual meetings and seminars, including the 2023 Macau ESG and High-Quality Development of Accounting International Seminar and the 2024 Hengqin Guangdong, Hong Kong and Macao University Accounting Alliance Academic Annual Meeting, inviting academic and industry experts to discuss the latest ESG regulatory requirements and practical cases to promote the application of ESG concepts in practice. He has guided more than 10 PhD students to conduct ESG-related research, and based on the perspectives of corporate governance, operation performance and information disclosure quality, he has analysed and revealed the importance of ESG and its economic consequences through empirical research, which has important guiding value for deepening the theoretical cognition and practical application of ESG. In terms of ESG practice, Mr. Lin Zhijun has served as a member of the ESG Special Committee of the Board of Directors of many Hong Kong and Mainland listed companies. He has rich practical experience in ESG regulatory policies and normative research, ESG performance evaluation system development, and ESG information disclosure.

Mr. Zhang Weiguo was the Chief Accountant and Director General of the Department of International Affairs of the China Securities Regulatory Commission (CSRC), responsible for formulating and supervising the financial and nonfinancial information disclosure requirements of China's capital market. During his tenure, he also served as a member of the CSRC's Public Offering Review Committee and Administrative Sanctions Committee. As a member of the Standing Committee 1 of the International Organisation of Securities Commissions, he has participated in many international discussions on accounting, auditing and non-financial information disclosure (covering ESG, sustainable development, and climate change related issues). During his tenure as a member of the International Accounting Standards Board, he participated throughout the development of a series of accounting standards on financial instruments—including impairment losses on financial instruments, dynamic risk management for financial institutions and hedge accounting—as well as the accounting standard on insurance contracts. He was also deeply

involved in discussions on emerging frameworks such as the Global Reporting Initiative and the International Integrated Reporting Council. Mr. Zhang Weiguo has rich professional knowledge and work experience in the fields of ESG including climate: as a member of important institutions such as the Sustainable Disclosure Standards Advisory Committee of the Ministry of Finance of the People's Republic of China, the ESG Committee of the China Association for Public Companies, the G7 Impact Taskforce, the International Foundation for Valuing Impacts and the Capitals Coalition, he has participated in the formulation of a range of disclosure standards and supporting rules related to climate and other ESG matters; he teaches ESG-related doctoral and MBA courses at Shanghai University of Finance and Economics and Tsinghua University; he has published a large number of professional papers on ESG and climate change and authored several monographs, including the *ESG Information Disclosure, Rating and Assurance* and the *ESG and Information Disclosure: Standards, Measurement and Value Effects*; he has also founded an ESG and climate issue exchange platform with nearly 500 members to provide academic and practical support for the development of the industry.

## 2. The Management

The Management is responsible for clarifying ESG objectives, deploying major work tasks, and coordinating and supervising all business lines, domestic and overseas branches, and subsidiaries in the implementation of ESG work tasks. The Management establishes multiple committees and work groups to advance ESG management matters with clear division of responsibilities and coordinated effort, effectively playing a planning and guiding role in the Bank's sustainable development pathway. The composition and responsibilities of the committees of the Bank's Management are as follows:

Committee	Responsibilities
ESG Promotion Committee	Chaired by President of the Bank, this committee, including 34 member departments (institutions), is responsible for overall management of ESG strategy planning,

	<p>deployment, and coordination. This committee consists of three work groups: Environment, Social Responsibility, and Information Disclosure and Investor Relations. Each work group has clear roles and closely collaborates to effectively advance various initiatives.</p>
Green Finance Committee	<p>Chaired by President of the Bank, this committee oversees the overall promotion of green finance across the Bank, responsible for studying and making decisions on significant matters related to the advancement of green finance business, and plans and implements key directions and initiatives for the development of green finance across the Bank.</p>
Inclusive Finance Development Committee	<p>Chaired by the Bank's executives, this committee is responsible for coordinating the development of inclusive finance business across the Bank, as well as studying and implementing the inclusive finance-related work arrangements of government authorities and regulators and the work requirements for promoting the development of inclusive finance across the Bank, put forward by the Board of Directors and senior management. Within its authority, the committee reviews significant operation and management matters.</p>
FinTech and Digitalisation Promotion Committee	<p>Chaired by the Bank's executives, this committee is responsible for coordinating the</p>

	strategic planning and overall promotion of the Group's digital transformation, and studying digital transformation strategies, policies, and the development across the Bank. This committee reviews significant matters such as digital transformation and related data security and personal information protection. The committee ensures compliance with regulatory requirements and undertakes responsibilities of relevant leadership groups.
Consumer Protection Committee	Chaired by the Bank's executives, this committee conducts unified planning, deployment, promotion and supervision of consumer protection. This committee specifically arranges consumer protection initiatives and listens to reports on implementation, studies and addresses key and difficult issues, systematically organises and advances relevant efforts, and continuously tracks the implementation results.
Risk Management and Internal Control Management Committee	Chaired by President of the Bank, this committee is responsible for coordinating key risk and internal control matters across the Bank (including overseas operations and domestic subsidiaries), promoting the enhancement of the risk and internal control governance system across the Bank, studying the effectiveness of comprehensive risk management and internal control, coordinating to resolve existing issues, and

	deliberating on significant matters.
--	--------------------------------------

## (II) Progress in ESG Governance

The Board of Directors conducts special reviews on the work reports from the Management regarding ESG-related issues, earnestly fulfilling its oversight and guidance responsibilities. Based on the Bank's ESG practice foundation, the Board guides the benchmarking against industry-leading ESG standards, improves the collaborative linkage mechanism, promotes research and exploration of ESG practices, and continuously enhances the quality and effectiveness of ESG management. From the second half of 2025 to the first half of 2026, the Board of Directors and the Management of the Bank advanced work on ESG governance as follows:

The Board of Directors	Progress
The Board of Directors and the Strategy Development Committee	<p>In the second half of 2025, six board meetings and two meetings of the Strategy Development Committee were convened. The Board of Directors reviewed and approved proposals including the Bank's <i>Half-Year Report 2025</i>, the <i>2025 First-Half Comprehensive Risk Management Report</i>, and the <i>Third Quarter Report of 2025</i>. In line with regulatory requirements and ESG work needs, the Board of Directors also reviewed and approved the <i>Report on Consumer Protection Efforts in the First Half of 2025</i> and the <i>Work Plan for the Second Half of the Year</i>. Additionally, the Board reviewed written reports such as the <i>Report on the Circular of Consumer Complaints in the Banking Industry in the First Quarter of 2025</i> and the <i>Report on the Circular of Consumer Complaints in the Banking Industry in the First Half of 2025</i>, and participated in relevant anti-money laundering compliance training.</p> <p>In the first half of 2026, seven board meetings and three</p>

	<p>meetings of the Strategy Development Committee were convened. The Board reviewed and approved proposals including the Bank's <i>2025 Annual Report</i>, the <i>2026 Risk Appetite Statement</i>, the <i>First Quarter Report of 2026</i>, the <i>Comprehensive Risk Management Report of 2025</i> and the <i>2025 Sustainability Report</i>. In line with regulatory requirements and ESG work needs, the Board also reviewed and approved the <i>Report on Consumer Protection Efforts in 2025</i> and the <i>Work Plan for 2026</i>, the <i>Special Report on Related Party Transactions in 2025</i>, the <i>2025 Performance Remuneration Clawback Report</i> and the <i>Anti-money Laundering Work Management Measures (2026)</i>. Additionally, the Board reviewed written reports such as the <i>2025 IT Risk Management Report</i>, the <i>2025 CCB Consumer Protection Regulatory Evaluation and Complaint Circular</i>, the <i>Report on the Implementation of the Master Plan for Building a Digital CCB in 2025</i>, the <i>Report on Anti-money Laundering Efforts for 2025</i>, and the <i>Report on Data Governance Self-assessment for 2025</i>.</p>
<p>Related Party Transaction, Social Responsibility and Consumer Protection Committee of the Board of Directors</p>	<p>In the second half of 2025, the committee held two meetings. The committee listened to the banking consumer complaints, regulatory assessment of consumer protection, related-party transactions and related management, and the semi-annual implementation progress of the <i>Environmental, Social and Governance Work Plan (2023–2025)</i>.</p> <p>In the first half of 2026, the committee held four meetings. The committee reviewed the <i>2025 Sustainability Report</i> and the <i>Special Report on Related Party Transactions in 2025</i>, listened to reports on the implementation of the <i>Environmental, Social and Governance Work Plan (2023-2025)</i> in 2025, the execution of charitable donations in 2025, the work advancement of green finance, the work progress</p>

	<p>of inclusive finance, the business promotion of county and rural finance, the work advancement of privacy and data security, consumer protection, related-party transactions and related management. The committee also discussed the Bank's ESG rating status.</p>
<p>Risk Management Committee of the Board of Directors</p>	<p>In the second half of 2025, the committee held two meetings. The committee provided guidance on strengthening environmental and climate risk management, listened to periodic report on analysis of environmental and climate-related risks and opportunities, continuously promoted the Group's green operations, carried out research on carbon emission accounting for investment and financing activities, further enhancing the level of climate-related information disclosure.</p> <p>In the first half of 2026, the committee held four meetings. The committee reviewed and approved the 2026 Risk Appetite Statement, incorporating ESG risks into the Group's risk appetite, promoting the improvement of the ESG risk management system for investment and financing activities, integrating ESG risk control requirements into the entire process of investment and financing activities, continuously increasing the proportion of green loans, proactively conducting transition finance business, and actively contributing to biodiversity protection. The committee listened to the 2025 IT Risk Management Report, and studied IT risk identification and assessment, risk monitoring, risk control, risk landscape, and related work plans. The committee provided guidance on strengthening control over risks related to network and information security, business continuity, IT outsourcing risks, and risks arising from the application of new technologies.</p>
<p>Nomination</p>	<p>In the second half of 2025, the committee held five meetings.</p>

and Remuneration Committee of the Board of Directors	<p>The committee conducted in-depth research on employee compensation structure, and continuously promoted the tilt of compensation distribution towards front-line employees.</p> <p>In the first half of 2026, the committee held five meetings, provided guidance on strengthening the development of a professional talent team. The committee listened to the report on employee training in 2025 and work plans for 2026, focused on the construction of a full-cycle training system for employee career development and the progress of cultivating interdisciplinary talents in key areas, urged the strengthening of training on artificial intelligence application capabilities, enhanced the building of an international talent team, and made efforts to build a high-quality and professional talent team.</p>
Audit Committee of the Board of Directors	<p>In the second half of 2025, the committee held three meetings, including one closed-door session with external auditors and one pre-communication meeting to discuss the interim financial report.</p> <p>In the first half of 2026, the committee held four meetings, including one closed-door session with external auditors and one pre-communication meeting to discuss the annual financial report. The committee guided the Management in implementing the relevant requirements of the <i>Comprehensive Evaluation and Assessment Measures for Carbon Peaking and Carbon Neutrality</i> issued by the CPC Central Committee and the State Council, and strengthened the analysis of related impacts.</p>
<b>The Management</b>	<b>Progress</b>
ESG Promotion	In the second half of 2025, the President of the Bank presided over a meeting of the ESG Promotion Committee.

Committee	<p>At the meeting, the committee listened to the reports on the progress of ESG initiatives and advanced practices and insights of international peers on sustainable development. It reviewed the <i>Sustainability Information Disclosure Procedures</i> and discussed and deployed the key ESG priorities for the next stage.</p> <p>In the first half of 2026, the committee actively advanced the implementation of requirements and plans made at the 2025 annual work conference, continued to follow up on the progress of the <i>Environmental, Social and Governance Work Plan (2023-2025)</i>, issued and implemented the <i>Sustainable Information Disclosure Procedures (2026 Version)</i>, and studied and formulated the <i>Environmental, Social and Governance Work Plan for the “15th Five-Year Plan” Period</i>.</p>
Green Finance Committee	<p>In the second half of 2025, the President of the Bank chaired a meeting of the Green Finance Committee, listened to the progress of green finance work, examined work related to Carbon Peaking and Carbon Neutrality in the Group’s own operations, and deliberated on the first batch of candidates for the green finance talent pool, and made arrangements for the next steps in green finance business development and climate risk management.</p>
Inclusive Finance Development Committee	<p>In the first half of 2026, the committee thoroughly implemented regulatory policies and work requirements, refined implementation measures, focused on the needs of inclusive client groups such as small and micro enterprises, and increased credit supply and comprehensive service support, continuously improving the inclusive financial service model and solidly promoting the high-quality and sustainable development of inclusive finance business.</p>
FinTech and	<p>In the second half of 2025, a total of five plenary meetings</p>

Digitalisation Promotion Committee	<p>and five special-topic meetings were convened. The meetings reviewed and approved the <i>China Construction Bank “AI+” Knowledge and Data Management Framework Development Plan</i> and the 2026 IT Capability Development Plan for Overseas Institutions and Subsidiaries, among other proposals, and made arrangements for key priorities and initiatives.</p> <p>In the first half of 2026, the committee held two plenary meetings and 3 thematic sessions. The committee reviewed and approved proposals including the <i>CCB Information Technology Outsourcing Work Plan (2026–2028)</i>, the IT Operation Work Plan for the Group and the Infrastructure Product Management Optimisation Plan, and made arrangements for key work tasks.</p>
Consumer Protection Committee	<p>In the second half of 2025, the committee held four meetings, focusing on the progress of consumer protection work and work plans, regulatory circular of consumer complaints, and the review of key consumer protection rules and regulations.</p> <p>In the first half of 2026, the committee held one meeting, focusing on reviewing the progress of consumer protection work in the previous phase, listening to experience sharing from certain branches, and deploying work requirements for the next phase.</p>
Risk Management and Internal Control Management Committee	<p>In the second half of 2025, the committee held two meetings, conducting in-depth research on the implementation of rectification measures for issues identified in regulatory circulars, the quarterly credit asset quality situation, and the progress of the “113” working mechanism, etc.</p> <p>In the first half of 2026, the committee held two meetings, conducting in-depth research on the overall risk management situation, the construction plan for the</p>

	intelligent risk control platform, and the business impact analysis report, etc.
--	--

### **(III) ESG Performance Assessment**

The Bank is committed to establishing a sound ESG performance assessment system, promoting the integration of sustainable development performance into the remuneration evaluation structure, implementing the remuneration clawback mechanism, and effectively safeguarding shareholders' right to review and supervise in executive remuneration decisions, thereby continuously strengthening the oversight and constraint effectiveness over the ESG governance of the Board of Directors and the Management.

#### **1. Remuneration clawback mechanism**

In accordance with the *Supervisory Guidelines on Sound Compensation in Commercial Banks*, the Bank has established and continuously improves the clawback mechanism for performance remuneration of senior management members and key personnel, and continuously refines the internal system related to the clawback of performance remuneration, which ensure, based on the severity of the situation, partial or total clawback of performance remuneration within the corresponding period.

##### **1.1 Management structure**

The Bank's Board of Directors and the Nomination and Remuneration Committee are responsible for overseeing and guiding the implementation of the Bank's rules on performance evaluation system and remuneration system, and annually review the proposal on the report on the clawback of performance remuneration. The Management implements the regulatory requirements and the internal performance remuneration system; the Comprehensive Operation and Management Committee is responsible for organising the implementation of the Board of Directors' remuneration management resolutions; and the Accountability Committee is responsible for conducting deliberation and approval on accountability. The Human Resources Department of the Head Office is responsible for the concrete implementation of management initiatives on relevant clawback provisions; the Internal Control and Compliance

Department of the Head Office is responsible for the pursuit of accountability for non-compliance; and the Audit Department, Risk Management Department, and Finance and Accounting Department of the Head Office are responsible for supervising the implementation of the remuneration mechanism and providing feedback for improvement.

### **1.2 Policy requirements**

The Bank has issued and implemented the *Management Measures of Deferred Payment and Clawback of Performance Remuneration (2024 Version)*, strictly enforcing the deferred payment and clawback policy of performance remuneration for the Group's senior management members and key personnel. Over 40% of performance remuneration is subject to deferment, with a minimum deferment period of three years, following the principle of equal division. The Bank clearly stipulates that, if senior management members and key personnel make a significant mistake, cause significant financial loss to the Bank, fail to meet performance assessment standards, falsify performance results, or violate remuneration management procedures, the recourse and clawback process will be initiated for previously distributed performance annual salary and term incentive income.

### **1.3 Implementation process**

The Bank assesses the severity of the circumstances which lead to the clawback of performance remuneration and enacts varying proportions of payment clawback on the related staff. The category of remuneration to be clawed back is performance remuneration, including quarterly performance or annual performance, and the methods include the reduction of a fixed amount or between 5% and 100% of the performance remuneration. The specific clawback decision is followed by a clawback action. During implementation, the clawback is first deducted from the performance remuneration to be paid in the current year. If the amount is insufficient, further deductions are made from the unpaid and deferred performance remuneration. If the amount is still insufficient, additional deductions will be preferentially taken from the employee's other remunerations. If a shortfall still exists, the Bank may require relevant personnel to return salaries that have been paid.

## **2. Pay linked to sustainability**

The Bank has established and continuously improves the performance evaluation mechanism for executive directors and senior management members. The Bank continuously optimises the mechanism of linking remuneration to sustainability. In accordance with regulatory policy requirements, articles of association, and annual business plans, sustainability-related indicators are integrated as part of the performance evaluation.

### **2.1 Indicators**

The Bank has established quantitative and qualitative sustainability-related indicators for the performance evaluation indicator system. Based on the Bank's sustainable development objectives of "striving to develop green finance, improving green operation management, helping to protect the environment from pollution and promote the low-carbon transformation of the economy and society, enhancing consumer rights protection, and strengthening talent planning and training", the Bank continues to improve the establishment of sustainability-related indicators and performance evaluation mechanism, setting a direct link between performance evaluation result and remuneration, in line with the sustainable development strategy of the Bank, ensuring the implementation of relevant management initiatives.

- Quantitative assessment on sustainability: Establishing sustainability-related indicators such as "technology finance" and "green finance", with total weight over 20%, covering technology finance, green finance, inclusive finance, rural revitalisation, customer protection, and anti-money laundering.
- Qualitative evaluation on sustainability: Establishing sustainability-related indicators such as "duty performance assessments", clearly requiring "comprehensively promoting green finance, vigorously supporting the low-carbon transformation of key areas such as energy conservation and environmental protection, clean energy, and traditional enterprises, and making efforts to provide financial support for achieving Carbon Peaking and Carbon Neutrality", as well as emphasising complete, accurate and comprehensive implementation of the new development concept,

continuously improving corporate governance, promoting the modernisation of the governance system and governance capabilities, promoting business transformation and development innovation, and the total weight of such qualitative indicators accounted for over 20%.

## **2.2 Implementation**

Since the establishment of sustainability-related indicators, the Bank has continuously reinforced the close link between sustainability performance and remuneration of executive directors and senior management members to optimise the setting of sustainability-related indicators and assessment mechanism, regarding the results of performance evaluation as the basis of the floating coefficient for determining annual performance salary, which directly linked to their remuneration. Objectives and tasks related to sustainability have been more effectively achieved, and remuneration has effectively worked as an incentive and restraint in sustainable development.

## **3. Say on pay policy**

### **3.1 Policy essentials**

According to the rules of procedure of the Bank's shareholders' meeting, the shareholders' meeting shall exercise decision-making rights on the remuneration of directors in accordance with the law, implementing the effective supervision by the general shareholders over the allocation of remuneration to directors. In the course of specific implementation, the Management of the Bank formulates a remuneration distribution and settlement plan each year covering all directors and senior management members, which is implemented after being reviewed and approved by the Board of Directors, of which the remuneration distribution and settlement plan for directors shall also be submitted to the general meeting of shareholders for review and approval. All reviewed and approved remuneration distribution and settlement plans are disclosed to the public in accordance with relevant requirements.

### **3.2 Implementation**

On 29 April 2026, the first extraordinary shareholders' meeting of 2025 of the Bank was convened to review and approve the *Remuneration Distribution and Settlement Plan for Directors for the Year 2024*, details of which can be

found in the Bank's *Meeting Information for the First Extraordinary Shareholders' Meeting of 2026*, with the results of the deliberations as detailed in the *Voting Results of the First Extraordinary Shareholders' Meeting of 2026*.

## **II Corporate Behaviour**

The Bank integrates business ethics management requirements into the overall corporate governance structure, clearly defining the management responsibilities of the Board of Directors and the Management, and forming a management mechanism featuring coordinated advancement and joint oversight. The Bank adheres to the pursuit of high standards of business ethics, establishes a system of norms and policies covering all employees, reviews institutional management requirements such as anti-bribery, anti-corruption, employee behaviour management and whistleblower protection, distils and publicly discloses core principles. The Bank establishes multiple whistleblowing channels and safeguards the legitimate rights and interests of whistleblowers. The Bank carries out targeted training programmes on business ethics for different categories of personnel to ensure the effective reach of business ethics norms and requirements for all employees. The Bank regularly promotes business ethics audit and supervision, strictly adheres to the bottom line of compliant operations, effectively maintaining a fair, clean, and transparent business order.

### **(I) Business Ethics Governance Framework**

The Bank focuses on building the management system for business ethics related matters, incorporating anti-bribery, anti-corruption, anti-money laundering, employee behaviour management, conflict of interest, code of business conduct, and whistleblowing management into the scope of business ethics management. A standardised policy management system has been developed to clearly define the supervisory and management responsibilities of the Board of Directors and its Risk Management Committee in relation to business ethics matters. The Board of Directors is responsible for determining compliance management objectives, reviewing and approving the fundamental compliance management system, and evaluating the effectiveness of compliance management and the level of compliance culture building. The Risk Management Committee of the Board of Directors is responsible for supervising the compliance of the Bank's core business, management systems, and major operational activities.

The Board of Directors and its Risk Management Committee regularly review the evaluation report on the effectiveness of compliance management and the development of compliance culture. From the organisational structure, compliance system, compliance operation mechanism, safeguards for compliance management, and the effects of compliance management, the report assesses the effectiveness of the Group's compliance management and the level of compliance culture development to identify trends in compliance risk and work priorities, promoting to strengthen the Group's compliance culture construction. Additionally, the Board of Directors and its Management Committee conduct special studies on the report of the Bank's anti-money laundering work, guiding the improvement of the anti-money laundering management system and enhancing the Group's quality and efficiency on anti-money laundering.

In addition, in terms of employee behaviour management, the Bank's *Management Measures for Employee Behaviour* stipulates that the Board of Directors holds ultimate responsibility for employee behaviour management, including the approval of relevant codes of conduct and the supervision of the Senior Management in managing employee behaviours; the Senior Management is responsible for the implementation of employee behaviour management, including establishing a comprehensive employee behaviour management system, defining the responsibilities of relevant behaviour management departments, formulating policies for employee behaviours and ensuring that the policies are effectively implemented; and the Senior Management shall report results of employee behaviour evaluations to the Board of Directors annually.

## **(II) Anti-bribery and Anti-corruption**

The Bank strictly complies with all anti-bribery and anti-corruption laws and regulations in China and other jurisdictions in which it operates, as well as relevant international standards, and establishes the core values of "integrity, impartiality, prudence, and creation". Adhering to the principle of integrity in operation, the Bank is committed to creating a fair and transparent business environment. The Bank requires all employees and third parties engaged in business with the Bank to uphold business ethics requirements, act with

integrity, comply with market rules, and adhere to fair competition. The Bank adopts a “zero-tolerance” stance towards any form of bribery or corruption and continuously promotes the corporate culture construction of integrity and self-discipline.

### **1. Management structure**

The Bank has established an anti-bribery and anti-corruption management framework that involves the Board of Directors and the Management, and works closely with the public sector, focusing on the effectiveness and quality of anti-bribery and anti-corruption efforts. The Bank strictly enforces the supervisory mechanism for anti-bribery and anti-corruption efforts. Institutions dispatched by public authorities work with the Bank’s compliance departments, risk management departments, and internal audit departments to implement joint governance. They dynamically identify, assess, investigate, and control potential bribery and corruption risks, enforce relevant anti-bribery and anti-corruption policies and procedures, and regularly review the implementation of the mechanism.

### **2. System construction**

The Bank strictly complies with the *Banking Supervision Law of the People’s Republic of China*, the *Guidelines for the Internal Controls of Commercial Banks*, and other applicable laws, regulations, and regulatory requirements. The Bank has systematically reviewed existing internal anti-bribery and anti-corruption policies and compiled the *Anti-bribery and Anti-corruption Policy Overview*<sup>1</sup>, which was formally disclosed through public channels. This policy overview applies to directors, executives, all employees, and workers dispatched from labour leasing companies of the Bank and all subsidiaries, and systematically standardises the Bank’s anti-bribery and anti-corruption practices in terms of the scope of application, general principles and requirements, key areas and requirements, and management mechanisms. The Bank underscores the importance of integrity and self-discipline, clear separation between personal and public interests, and compliance engagement.

---

<sup>1</sup> *Anti-bribery and Anti-corruption Policy Overview*: [https://en.ccb.com/eng/2023-08/01/article\\_2023080117295361825.shtml](https://en.ccb.com/eng/2023-08/01/article_2023080117295361825.shtml)

It establishes specific requirements in critical areas such as personnel appointment and removal, procurement, credit, charitable donations, and management of business partners. In addition, it ensures the comprehensiveness and effectiveness of anti-bribery and anti-corruption efforts through establishing management mechanisms involving organisational safeguards, risk assessments, whistleblowing, compliance education and training, employee behaviour management, and record-keeping.

The Bank places great importance on employee behaviour management, establishing a multi-tiered policy system across the Bank and all business lines. This system clearly defines lawful and compliant behaviours that employees shall observe, improper behaviours that should be avoided, prohibited violations, and strictly forbidden illegal or criminal acts. The Bank has issued policy documents such as the *Code of Conduct for Employees of China Construction Bank* and the *Employee Compliance Manual of China Construction Bank*, which set out specific prohibitions across the Bank, particularly regarding employee involvement in bribery or corruption, the infringement of the security of the Bank or clients, and the infringement of personal information. For key business lines such as finance, credit, and procurement, the Bank has formulated specific rules, including the *Detailed Rules for the Management of Employee Behaviours in the Finance and Accounting Lines of China Construction Bank*, the *Prohibitions for Credit Personnel of China Construction Bank*, and the *Prohibitions for Procurement Personnel of China Construction Bank*. These dedicated guidelines effectively regulate employee behaviours to ensure the compliance of business operations. Additionally, the Bank has formulated the *Business Recusal Policy of China Construction Bank*, requiring employees to proactively declare and recuse themselves from involvement in the investigation, review, or decision-making processes of relevant matters when handling key business, so as to effectively prevent conflicts of interest.

### **3. Requirements for ethical behaviour**

The Bank strictly regulates employee behaviours. All employees are required to uphold professional ethics, adhere to the principles of separating personal and public interests, and maintain integrity and self-discipline. They

must proactively prevent and declare any actual or potential conflicts of interest, and are strictly prohibited from engaging in misconduct for personal gain. The Bank prohibits relevant improper behaviours, including accepting arrangements of hospitality, travel, fitness, entertainment and other activities that may affect integrity, and using one's authority to embezzle the Bank's assets, misappropriate public funds, engage in bribery or corruption, illegally make profits for oneself or family members, misuse of authority, insider trading in securities in violation of regulations, market manipulation, etc.

The Bank maintains a "zero-tolerance" stance towards bribery and corruption committed by employees. Any breach of anti-bribery and anti-corruption requirements will be immediately halted, followed by investigation and verification. Where the misconduct is substantiated, the Bank imposes internal accountability and disciplinary action depending on the severity of the circumstances. Employees found to have used their position power for personal gain in exchange for benefits, accepted gifts or monetary offerings in breach of regulations, secured benefits for related parties, or engaged in improper financial dealings may face disciplinary measures ranging from formal warning to dismissal, depending on the circumstances. Employees who accept hospitality, travel or similar arrangements that may compromise integrity may be subject to a warning or serious demerit for more serious cases, and demotion or removal from post for grave violations. When necessary, cases will be transferred to judicial authorities, and the Bank may issue internal notices and initiate rectification accordingly.

The Bank continues to strengthen the mechanism for detecting employee misconduct and implements a range of measures, including routine inspections and the monitoring of multi-role operation models in key business areas. These initiatives aim to enhance the Bank's ability to identify employee malpractice, including abuse of authority for personal gain, corruption, and misconduct that harms the interests of clients or the Bank, ensuring the effective management of the anti-bribery and anti-corruption efforts.

The Bank continuously strengthens integrity in supply chain, formulates and requires suppliers to sign the *Letter of Commitment on Integrity and Self-Discipline for Suppliers*, which clearly stipulates the standards and

requirements suppliers must comply with in areas such as anti-corruption and anti-commercial bribery, reinforcing suppliers' compliance awareness and building a solid line of defence against integrity risks from the source. The Bank regularly conducts review and supervision of suppliers' integrity and compliance status, identifying any adverse behaviours suppliers involved. Based on the nature of the behaviour, adverse behaviours are classified into minor adverse behaviours, general adverse behaviours, and serious adverse behaviours. The criteria for determination include the Bank's verification results or handling decisions, relevant judgments, rulings or decisions of judicial authorities, and penalties or sanctions imposed by other competent government authorities. Among these, serious misconduct includes engaging in commercial bribery, committing commercial fraud, and having improper financial dealings with the Bank's procurement personnel or their relatives, resulting in exit treatment with a withdrawal period of three years, applicable across the entire Bank. For cases involving "bribe-givers" with particularly serious circumstances, the supplier shall be permanently disqualified from participating in the Bank's procurement activities.

### **(III) Business Ethics Training**

The Bank is committed to building a hierarchical, classified and fully covered business ethics training system, continuously promoting and assisting employees in enhancing their business ethics literacy, and effectively supporting the implementation of high-standard business ethics norms across the Bank. Targeted business ethics training mechanisms and course resources are established for different groups, including the Board of Directors, the Senior Management, all employees, key positions, compliance positions, and new employees, cultivating business ethics awareness among all employees in a refined manner and deeply practising business ethics standards. The Bank expands diversified training formats such as collective education sessions, online learning and test evaluation, and regularly carries out business ethics training and compliance warning education to all employees, with content focusing on core areas such as anti-corruption, anti-money laundering, anti-fraud, personal information protection, sanctions risk, compliance risk and violation handling, comprehensively fostering a clean and upright culture of

integrity.

### **1. Members of the Board of Directors and the Senior Management**

The Bank has arranged for the Board of Directors and the Senior Management to participate in various special trainings conducted by financial regulatory authorities, industry self-regulatory organisations and other institutions to ensure that they keep abreast of the latest supervisory policies and legal requirements and continuously improve their performance. All of the Bank's members of the Board of Directors participated in trainings on anti-corruption, anti-money laundering, and the interpretation of laws, regulations and regulatory policies applicable to listed companies, effectively enhancing their decision-making and compliance governance capabilities in accordance with the law.

### **2. All employees (including workers dispatched from labour leasing companies)**

The Bank has established a business ethics training mechanism covering all employees, built a combination of online and offline training channels such as centralised publicity, collective learning, independent learning, and online courses, and regularly organised all employees to participate in business ethics standards training and capacity building.

The Bank has organised all employees to study the *Code of Conduct for Employees*, and relevant anti-corruption system specifications, clearly conveying the requirements of compliance and honest practitioners to operations and employees at all levels, to jointly maintain a fair and honest work environment. Focusing on business ethics standards and compliance work specifications, the Bank clearly requires all employees to abide by the bottom line of integrity, strictly prohibiting using their authority to seek improper interests, strictly prohibiting theft, embezzlement or misappropriation of funds or other property of the Bank and clients, strictly prohibiting improper financial transactions with stakeholders, eliminating false and misleading statements in credit or investment and wealth management business, strictly prohibiting the sale of consumer financial information, and prohibiting unauthorised sale of

financial products not from the Bank, to effectively enhance the compliance awareness of all employees. Meanwhile, by analysing typical cases, the Bank continues to strengthen warning and education effects, guiding employees to consolidate the ideological foundation of “not wanting to violate regulations”.

In order to continuously deepen employees’ understanding of compliance education and increase the frequency of compliance education, the Bank actively organises online tests, knowledge competitions, and other interactive learning activities to reinforce the effectiveness of learning outcomes. The Bank utilises the employee behaviour management system to deliver diverse compliance education content through various forms, including videos, audios, articles, and messages, supporting online interactions and communications with employees. As of the end of the first quarter of 2026, a total of 430 thousand attendances had been recorded for the learning, with the warning and education materials accurately delivered.

The Bank continues to promote honest and clean financial culture building, creates online and offline platforms for integrity education targeting all employees across the Bank, giving full play to the fundamental effect of education and strengthening employees’ awareness of integrity and compliance. The Bank launches an integrity education channel on the “CCB Learning” platform, offering nearly 50 high-quality courses by means such as inviting well-known experts and scholars to record premium courses on integrity engagement and introducing *Integrity Warning and Education Videos*. Offline integrity education bases have been established at the Training Institutes in the northeastern and eastern China, providing integrity and compliance education to employees participating in training programmes. In the first half of 2026, the Bank’s discipline inspection office carried out two sessions of “Bringing Discipline into the Classroom”, provided guidance to the heads of League and Youth organisations at the Head Office with the session themed *Having Boundaries in Mind, Knowing Where to Stop -- Discipline and Law Exchange and Case Sharing*, and provided explanations and reminders for the “Overseas Audit Team Capacity Enhancement Training Programme” at the Head Office with the session themed *Key Audit Discipline Concerns and Case Sharing for Overseas Operations*. The Bank regularly conducts discipline education and

the cultivation of an honest and clean culture, effectively promoting the deep-rooted acceptance of the integrity concept. As of the end of June 2026, primary Party organisations based in Beijing have organised over 50 batches, with more than 3,000 visits, to tour the China Construction Bank Integrity Education Base.

### **3. Outsourced personnel**

The Bank clearly requires outsourced service providers, through agreements or contracts, to fulfil business ethics training obligations, including training on security skills and confidentiality management. Outsourced personnel are required to sign a supplier confidentiality commitment letter and a personnel confidentiality agreement before entering the workplace. In accordance with the principle of “whoever uses is responsible”, the Bank conducts regular inspections of the service provider through on-site inspections and reviewing outsourced personnel’s security and confidentiality training records, ensuring that business ethics training requirements are effectively implemented and cover all personnel. In the first half of 2026, inspections were conducted on IT outsourcing personnel engaged in development and testing, operations and maintenance, and security services, covering all outsourced personnel working on site.

### **4. Compliance personnel**

The Bank regularly conducts training for compliance personnel every year, covering core areas such as employee behaviour management, case prevention and control, and accountability for non-compliance, to focus on improving the professional quality and performance of compliance personnel by specialised trainings. In the first half of 2026, the Bank organised specialised training sessions for employees in compliance-related roles within the Group on topics such as employee behaviour management, daily duty performance, and abnormal behaviour investigation.

### **5. Key positions personnel**

For key positions, such as branch managers, client relationship managers, and customer service managers, the Bank regularly organises normalised warning and education activities on compliance and anti-corruption every year through diversified education forms such as issuing case studies, organising

online compliance tests, and producing warning and education videos to effectively enhance the compliance awareness and risk prevention capabilities of key positions personnel.

## **6. New employees**

The Bank regards business ethics as an important part of the induction training of new employees, through a combination of online and offline training methods, conducts special training for new employees such as employee code of conduct and prohibitive provisions every year. The Bank adopts a variety of methods such as special campaigns, door-to-door delivery of lessons and online quizzes to focus on strengthening the knowledge and understanding of business ethics standards among new employees, effectively improving employee professional ethics and compliance awareness, to ensure that business ethics requirements are effectively implemented.

## **(IV) Whistleblower Protection**

The Bank consistently adheres to strict governance, continuously improves the employee behaviour management mechanism, unblocks and expands supervision and reporting channels, and strives to build a rigorous and efficient comprehensive supervision and management system. The Bank formulates and strictly implements a series of policies including reporting and petitioning, encouragement of real-name reporting, clarification of false reporting, and rewards for reporting illegal or irregular activities, strictly implements measures for protecting the identity of whistleblowers and preventing retaliation, effectively safeguarding the legitimate rights and interests of whistleblowers. The Bank continuously improves the closed-loop handling procedure for reported matters, systematically carries out supervision and inspection and special training related to whistleblower protection, effectively improving the efficiency of reporting illegal activities and effectively strengthening the business ethics across the Bank.

### **1. System construction**

The Bank continuously optimises the whistleblower protection supervision mechanism, actively ensures smooth reporting channels, and firmly protects the legitimate rights and interests of whistleblowers. The Bank has

systematically sorted out a series of reporting policies, including Letters and Visits, encouragement of real-name reporting, clarification of false reporting, and rewards for reporting illegal or irregular activities. These practices were generalised and consolidated into the *Whistleblowing Policy Overview*<sup>2</sup>, which was officially published, comprehensively enhancing the transparency and credibility of the system. This policy applies to whistleblowers who obtained information about misconducts in relevant scenarios within the Bank (including all employees, clients, suppliers, etc.). The scope of reported incidents includes financial issues, internal control vulnerabilities, illegal activities, and regulatory violations. Reporting channels include letters, emails, phone calls, faxes, on-site visits, and other online and offline channels. Reporting methods include real-name and anonymous reporting.

The Bank conscientiously implements the requirements of the *Regulations on Letters and Visits*. The Bank has established complete letters and visits reporting channels at various levels, set up dedicated departments at tier-2 branches and above to receive and handle letters and visits, providing whistleblowers such as citizens, legal entities, or other organisations with various means such as letters, emails, phone calls, faxes, and visits, to extensively collect issues and suggestions on operation management, labour employment, personnel appointment, business disputes, customer services, and business ethics. The relevant channels were published on the Bank's website to provide convenience for whistleblowers to report complaints, ensuring timely and effective handling of reported issues.

The Bank strictly adheres to the confidentiality system for whistleblower information, ensuring the confidentiality and legal rights of all whistleblowers. The collection, storage, use, processing, transmission, provision, and deletion of whistleblower information are conducted in accordance with legal, legitimate, necessary, and honest principles. The Bank strictly abides by relevant national laws and regulations as well as relevant systems of the Bank, strictly controlling the scope of access to the information, and prohibiting unauthorised retention

---

<sup>2</sup> *Whistleblowing Policy Overview*: [http://www.ccb.com/eng/2023-08/01/article\\_2023080117451927647.shtml](http://www.ccb.com/eng/2023-08/01/article_2023080117451927647.shtml)

and information disclosure. The Bank handles whistleblower reports, based on facts, legal regulations and internal rules, in accordance with prescribed procedures, including overall management, dedicated personnel, and priority handling of significant reports.

In addition, the Bank issued the *Measures for Rewarding Blocking, Resisting, and Reporting Illegal and Irregular Behaviours* to actively encourage and guide all employees to proactively prevent, resist, and report all types of illegal and irregular behaviours, and to reward and commend relevant employees who truly reported or proactively provided information on misconduct, resolved risks in a timely manner, and reduced or avoided the loss of funds and assets of the Bank and clients, requiring all operations to keep employees' personal information confidential. The Bank regularly reviews and revises the *Measures for Handling Employee Violations*, which clearly stipulates any behaviour that obstructs others from reporting, leaks whistleblower information, retaliates against whistleblowers, or intervenes with the handling of reports, shall be subject to administrative penalties in accordance with applicable laws and regulations.

## **2. Protection measures**

The Bank strictly adheres to the confidentiality system for reported matters to effectively safeguard the confidentiality of the identity and legitimate rights and interests of all whistleblowers. The Bank has implemented a series of protective measures for whistleblowers, including but not limited to the following aspects:

- The collection, storage, use, processing, transmission, provision, and deletion of reporting information adhered to the principles of legality, legitimacy, necessity, and integrity, in compliance with relevant national laws and regulations on personal information protection, as well as the Bank's information security policies;
- The Bank controlled the scope of access to information about the handling of reported matters and strictly prohibited unauthorised retention, concealment, access, transcription, copying, or acquisition of related issue clues and materials;

- Without the consent of the whistleblower, it was prohibited to disclose information regarding the identity of the whistleblower or the content of the report to anyone other than the authorised personnel responsible for receiving and handling the report;
- The storage of reporting information did not exceed a necessary and appropriate period of time;
- Violations, such as obstructing others from reporting, leaking reporting information, retaliating against whistleblowers, and interfering with the handling of reports were dealt with in accordance with relevant laws and regulations, as well as the Bank's regulations, such as the *Provisions on the Administration of Letters and Visits* and the *Measures for Handling Employee Violations*. Depending on the nature, impact and consequences of the violation, the Bank gives punishment ranging from warning to dismissal.

### **3. Processing procedure**

The Bank coordinates the management of reported matters received through various channels, assigns dedicated personnel for coordination, and promptly registers and follows up on processing procedures. For reported matters that included the whistleblowers' real names (or organisation names), with clear and accurate address and contact information, the Bank promptly informs the whistleblower of the acceptance and processing results, and according to the nature of the matter and the scope of personnel involved, different authorised institutions handle the matter according to their respective responsibilities and management authority. The Bank conducts the processing of reported matters in accordance with regulations and procedures for letters and visits. Significant reported matters are promptly escalated, timely reported and given priority in processing. Meanwhile, the avoidance system is strictly processed. If a whistleblower - handling personnel is a close relative of the reported person or any other relationship exists that may affect impartial handling, the personnel must not participate in the reporting process. The whistleblower and other relevant individuals have the right to request recusal.

### **4. Supervision and training**

The Bank supervises and inspects whistleblower mechanism's effectiveness and the protection of whistleblowers, aiming to enhance the quality and effectiveness of whistleblower protection. In the first half of 2026, the Bank organised the Letters and Visits research group to visit relevant branches for research and supervision four times, organised a joint meeting on Letters and Visits at the Head Office, briefed relevant information on Letters and Visits work, studied resolutions of key Letters and Visits matters, and made further efforts to reinforce the responsibilities of local branches and facilitate the resolution of such matters. The Bank focuses on key tasks such as source governance of Letters and Visits contradictions, standardisation of Letters and Visits business, and construction of Letters and Visits cadre team, to support the high-quality development across the Bank.

## **(V) Business Ethics-Related Audits and Inspections**

### **1. System construction**

The Bank attaches great importance to the supervision and refined management in the field of business ethics, and strives to build a systematic, complete, scientifically standardised, and effectively operational supervision mechanism. The Bank fully implements the requirements of relevant policies, such as the *Anti-Money Laundering Management Measures*, the *Operational Risk Management Policy*, the *Management Measures for Risk Prevention and Control of Criminal Cases*, and the *Measures for Handling Employee Violations*. Focusing on core areas of business ethics-related matters such as anti-bribery, anti-corruption, anti-money laundering, employee behaviour norms, and operational risk management, the Bank establishes a regular work progress review mechanism, and regularly organises audits and inspections on business ethics-related matters across the Group, thereby consolidating the compliance foundation and effectively building a solid line of defence for clean conduct.

The Bank conducts data analysis related to employee behaviours covering all organisations of the Group on a regular basis, and conducts online intelligent early warning and dynamic monitoring of employee abnormal behaviours. Based on the principle of risk orientation, combined with regulatory requirements and actual business operation and development, the Bank

conducts comprehensive risk assessment of all operations every year, dynamically determines the focus of audit attention and coverage of business ethics matters, and ensures that the audit on matters related to business ethics covers all operations of the Bank every year through a combination of special audits and comprehensive business audits, on-site and off-site methods. The Bank's examination focuses on the management of business ethics matters, including but not limited to the re-inspection, revision, and implementation of relevant policies and systems including the *Operational Risk Management Policy*, the *Management Measures for Risk Prevention and Control of Criminal Cases*, the *Management Measures for Employee Behaviour*, the *Measures for Handling Employee Violations*, and the *Anti-Money Laundering Management Measures*, the effectiveness of daily work procedures and systems' support, as well as the execution of employee behaviour management mechanisms that are either offline and grid based or online and intelligent, continuously strengthening the supervision and management of employee behaviour and business ethics. In addition, the Bank's external auditor regularly audits the effectiveness of the Group's internal control over financial reporting, takes the *Management Measures for Employee Behaviour* and other business ethics-related policies and their implementation as a key area of focus, reviews the relevant internal rules and regulations, understands the relevant control processes, and implements relevant control testing procedures.

In response to the situation of employee behaviour management, the Bank regularly implements investigations into irregular behaviours, carries out regular data analysis of employee behaviours, gives early warning to abnormal behaviours of employees, identifies and addresses misconduct such as abuse of authority for personal gain, corruption, and other unethical behaviours in time.

## **2. Work mechanism**

The Bank's Audit Department is responsible for developing the internal audit plan covering business ethics matters at the beginning of each year. Once approved by the Board of Directors, the plan is implemented accordingly. The Audit Committee of the Board of Directors regularly listens to the report on the key findings of internal audits and the progress on corrective actions, ensuring that relevant parties effectively address the issues identified during audits.

The Bank performs business ethics-related audits, including regular operational risk management audits, case risk prevention and control management audits, dynamic audits of operational risks related to employee behaviour, continuously and dynamically monitor the development and operation of the risk management system, the effectiveness and quality of employee behaviour management and case risk prevention management, and issues related to employee misconduct. The Bank also carries out anti-money laundering audits annually, focusing on the internal control mechanisms and core obligation fulfilment related to anti-money laundering. Additionally, annual audits are performed on the key business and operational management of overseas operations and subsidiaries, with a particular focus on compliance matters such as anti-money laundering and case risk prevention and control, ensuring proactive adherence to local and industry-specific regulatory requirements.

### **3. Work progress**

In early 2026, the Bank has completed the formulation of the internal audit plan for 2026, and is conducting dynamic audits on employee key operational risks for 37 domestic tier-1 branches, focusing on business ethics related matters such as cases risk prevention and control management, employee behaviour management and employee violation behaviours. Anti-money laundering special audits were conducted for ten domestic tier-1 branches, reviewing the management and issues rectification of client identification, transaction reporting, money laundering risk assessment and sanction compliance management, covering anti-money laundering related matters of other domestic branches through the operation and management audit of branches in the responsible area. The Bank paid attention to the implementation of overseas supervision and industry regulatory requirements. In accordance with the cycle coverage principle, the Bank conducted audits on the main business operations and management of 11 overseas operations and three subsidiaries, focusing on money laundering risk and sanctions compliance, continuously improving the audit supervision of business ethics and compliance across the Bank.

The Bank actively leverages the supervisory and management role of

inspection and disciplinary review work in promoting sound business ethics across the Group. In the first half of 2026, inspections were conducted on five subsidiaries. Party committees of tier-1 branches also carried out inspections of their respective head-office departments and tier-2 sub-branches. Focusing on power and responsibility, the inspections strengthened oversight of key areas, critical processes and “key minority”, with particular emphasis on identifying corruption and systemic issues related to the “Four Malfeasances”—formalism, bureaucratism, hedonism and extravagance—behind serious violations of discipline and regulations. Efforts were made to comprehensively uncover integrity risks and support the integrated investigation and remediation of “misconduct and corruption”. The inspections further encouraged inspected and reviewed entities to maintain a more stringent stance and adopt more substantive measures, continuously transmitting accountability pressure, strengthening education, management and supervision, closing gaps in systems and mechanisms, improving internal governance, and promoting comprehensive and strict governance over the Party to develop in depth.

## CHAPTER TWO ENVIRONMENT

### I Green Finance

The Bank earnestly implements Xi Jinping Thought on Ecological Civilization and steps up efforts in green finance. In line with the green finance working principles of comprehensive planning, steady and orderly progress, classified policies, and innovation-driven development, the Bank continues to implement the *Guiding Opinions on Deeply Stepping up in Green Finance* and other work requirements, fully supporting green and low-carbon development. Focusing on key tasks such as business development, green transformation, and product innovation, the Bank continuously enriches the green finance product and service system, improves the assessment and supervision mechanism of green finance, enhances comprehensive financial service capabilities, supports development in green and low-carbon fields, and contributes to the comprehensive low-carbon transformation of economic and social development.

#### (I) Green Credit

The Bank continues to expand the scope of green credit products and services to proactively meet the green development needs of enterprises. The Bank formulates and refines annual green finance development goals, optimises the green finance KPI assessment indicator rules and further improves incentive and guarantee measures to actively contribute to the overall green transformation of the economy and society and the realisation of Carbon Peaking and Carbon Neutrality. As of the end of the first quarter of 2026, the Bank's green loan<sup>3</sup> balance was RMB6.60 trillion, an increase of 10.13% over the beginning of the year on a comparable basis. Loans are primarily used to support the development of green industries. The three major industries of green upgrading of infrastructure, green and low-carbon transformation of energy, and energy conservation and carbon reduction together contributed more than 70% of the Bank's green loan balance.

---

<sup>3</sup> According to the latest statistics criteria of green loan of the People's Bank of China.

The Bank actively utilises monetary policy tools to comprehensively and deeply support green and low-carbon development, promote the green transformation of enterprises, and effectively support project construction in areas such as clean energy, energy conservation and environmental protection, carbon emission reduction technologies, and clean utilisation of coal. A green finance comprehensive service solution for corporate clients, named “Shan Jian Lu Xing”, has been formulated, focusing on five key scenarios of “green and low-carbon transformation of energy, green upgrading of infrastructure, green renewal of manufacturing, green agriculture and ecological protection, and green technology and services”, establishing a comprehensive financial service matrix. At the same time, the Bank continuously improves the green credit whitelist mechanism to enhance support for green enterprises and projects, and actively provides differentiated green credit policy support to high-quality clients.

**Case: Creating a diverse range of innovative green credit products**

The Bank continues to deepen green finance innovation, exploring participation in the activation of corporate carbon assets and conducting innovative research and cooperation with the national carbon market and exchanges. Based on the mechanisms of carbon allowance registration, trading, payment, and settlement, the Bank, in collaboration with China Pacific Property Insurance Co., Ltd., designed a “Credit Enhancement Based on Joint Carbon Account under Climate Investment and Financing” financing solution, effectively managing the intertemporal national carbon allowance assets under the ownership of borrowing entities. The Bank’s Dalian Branch successfully facilitated China’s first RMB10 million jointly managed carbon account credit enhancement loan for an energy company. This transaction broke through common challenges of static carbon allowance pledge financing products, such as short tenors and weak control, by establishing a multi-party collaborative supervision mechanism for carbon accounts and introducing an insurance company to hedge against the risk of cross period invalidation of allowances, achieving long-term and effective locking and

value preservation of carbon allowance assets. This provided financing and credit enhancement support for the green and low-carbon transition of key emitting enterprises in the national carbon market, representing a practical innovation by the Bank in implementing the national “Carbon Peaking and Carbon Neutrality” strategy and pressing ahead with the development of green finance.

## **(II) Green Bond**

The Bank carries out extensive exploration and innovation in the issuance, underwriting, and investment of green bonds, and actively participated in various green, low-carbon transformation and sustainability themed bond businesses. Based on actual business conditions and in light of industry trends, the Bank has scientifically and rationally set forward-looking and targeted goals and made every effort to promote the high-quality growth of the green bond business.

### **1. Green bond targets**

#### **1.1 Green bond issuance**

The Bank actively participates in the development of the green bond market, striving to achieve a cumulative issuance of domestic and foreign green and sustainable development bonds exceeding RMB100 billion over the next three years.

#### **1.2 Green bond underwriting**

The Bank actively underwrites innovative bond types in ESG fields such as green bonds, carbon neutrality bonds, sustainability-linked bonds, and transition bonds. In 2026, the Bank plans to maintain positive growth in the scale of green bonds underwritten and issued by various issuers.

#### **1.3 Green bond investment**

The Bank adheres to the principle of market-oriented investment, actively participates in the green bond subscription of high-quality issuers, and actively inclines resources to issuers with outstanding ESG performance. By the end of 2026, the growth rate of the Bank’s green bond subscription volume shall not

be lower than the growth rate of market issuance volume.

## **2. Green bond achievements**

### **2.1 Green bond issuance**

The Bank actively issues green bonds and ESG themed bonds and increases support for green projects. As of the end of the first quarter of 2026, the Bank had accumulatively issued approximately RMB193.4 billion of domestic and foreign green bonds and ESG themed bonds.

### **2.2 Green bond underwriting**

In the first quarter of 2026, the Bank underwrote green non-financial bonds with a total value of RMB8.568 billion, and was awarded 12 prizes including “Best Green Bond Underwriter” and “Best Chinese Offshore Green Bond Underwriter” in the 2025 Wind Best Investment Bank Awards.

### **2.3 Green bond investment**

The Bank actively serves the national strategy, inclines resources to excellent issuers that contribute to the green and sustainable development of the real economy and with preferable ESG performance. Focusing on the goals of “Carbon Peaking and Carbon Neutrality”, the Bank has carried out special research to provide theoretical support for green investment. As of the end of the first quarter of 2026, the Bank had cumulatively executed nearly 200 ESG bond investments and transactions and over 100 green bond investments and transactions. The scale of funds invested in the ESG field had exceeded RMB550 billion, and the scale of funds invested in the green field had exceeded RMB270 billion. Green bonds account for 20% of the Bank’s credit bond investment portfolio.

### **2.4 Green bond related consulting and advisory services**

The Bank actively offers green consulting and advisory services to clients, providing analysis and interpretation of green bond policies for issuers. The Bank assists issuers in identifying areas of policy alignment within their development strategies and core business, and helps them select suitable green project assets that align with the designated use of proceeds. Additionally, the Bank guides enterprises in adhering to the specified utilisation of raised

funds as outlined in the issuance documents. The Bank has issued and implemented the *Green Financial Advisory Business Linkage Plan with CCB Consulting*, simultaneously issued the *Green Financial Advisory Business Guidance Manual*, and actively carried out green advisory business cooperation, to enhance the comprehensive service capability of green finance. The Bank also includes the completion of the “green consultant scale” target in the main KPI of branches. As of the end of the first quarter of 2026, a total of 28 transactions had been carried out, with a business volume of RMB18.471 billion, covering multiple fields such as green environmental protection, photovoltaics, blue economy, and green transportation.

**Case: Underwriting green technology innovation bonds**

In 2026, the Bank underwrote and issued green technology innovation bonds of RMB5 billion for a renowned battery enterprise, with a coupon rate of 1.70%. The proceeds from the bonds were directed towards projects in the lithium-ion battery production sector. This issuance represented the largest green technology innovation bond in the interbank market to date, earning full recognition from the client and serving as a vivid example of the Bank's practice of integrating commercial and investment banking to enhance value creation.

**Case: Underwriting the first domestic “Panda + Blue” bond**

The Bank underwrote and issued the “2025 Fourth Phase Green Medium-Term Note (Blue Bond)” for a power enterprise, with an issuance size of RMB2 billion. This was the first blue and panda bond issued by an overseas non-financial enterprise in the domestic market, carrying the dual attributes of both a “panda bond” and a “blue bond”. The proceeds from this bond were used for offshore wind power projects, supporting the high-quality development of the marine economy and representing an important practice in the integration of RMB internationalisation and green finance innovation.

### **Case: Investing in China's first green railway bond**

The Bank supported China's first green railway bond, subscribing RMB1.07 billion to the 2026 Seventh Phase China Railway Construction Bonds. The proceeds from the bonds were used for 41 key construction projects, including the Xiong'an-Shangqiu High-Speed Railway and the Chongqing-Kunming High-Speed Railway, covering areas such as main high-speed rail corridors, trunk line capacity expansion and renovation, and electrification renovation. All projects were strictly selected in accordance with the *Catalogue of Green Finance-supported Projects (2025 Version)*, with outstanding environmental benefits.

## **(III) Other Green Finance Businesses**

### **1. Green funds**

CCB Principal Asset Management is a member of the United Nations Principles for Responsible Investment (UN PRI), and continues to deepen ESG integration. As of the end of the first quarter of 2026, CCB Principal Asset Management had successfully issued six ESG-themed fund products, covering multiple fields such as social responsibility, environmental protection, and new energy, with a total product size of RMB3.7 billion. The UCITS fund jointly launched by CCB Principal Asset Management and Principal Financial Group strictly complies with the standards of the EU *Sustainable Finance Disclosure Regulation* (SFDR) and has obtained Article 8 certification. As of the end of the first quarter of 2026, the fund's size had reached USD35.1981 million, with cumulative excess returns of 28.95% since inception.

### **2. Green custody**

The Bank's green custody products cover multiple major investment categories in the market, covering publicly offered funds, trusts, wealth management products, private equity funds, asset management plans and other varieties of products. As of the end of the first quarter of 2026, the Bank had a total of 195 green custody products, and the assets under custody of the

Bank had reached RMB231.2 billion.

### **3. Green leasing**

In active response to the national green development strategy, CCB Financial Leasing continuously increases investment in green energy projects related to wind power, PV power, hydropower, and clean utilisation of traditional energy. In the first quarter of 2026, the new green leasing investment amounted to RMB1.819 billion, accounting for 33.51% of the newly initiated general leasing business in the quarter. As of the end of the first quarter of 2026, the balance of green leasing assets had reached RMB45.672 billion, accounting for 61.88% of the general business balance. Over RMB634.8 million was deployed in residential photovoltaic projects, with an installed capacity exceeding 933.63 MW. All leasing funds were directed to county areas, benefiting approximately 30,147 rural households. According to preliminary estimates, the project could reduce carbon dioxide emissions by approximately 946.7 thousand tonnes, sulphur dioxide emissions by approximately 29.3 thousand tonnes, nitrogen oxide emissions by approximately 28.4 thousand tonnes, and soot and dust emissions by approximately 258.6 thousand tonnes.

### **4. Green insurance**

CCB P&C Insurance continuously introduces new green insurance products and service models, makes vigorous efforts in the research on ESG funds, insurance asset management products, etc., paving the way for deepening the innovation of green insurance business. As of the end of the first quarter of 2026, CCB P&C Insurance's green insurance business had recorded an insured amount of RMB29.5 billion, a year-on-year increase of 121%. CCB P&C Insurance's green insurance business covers three major fields, namely ESG risk insurance, green industry insurance, and green life insurance, among which green industry insurance plays a dominant role, achieving the provision of risk coverage of RMB25.8 billion (87%), green life insurance coverage of RMB3.7 billion (12%), and ESG risk insurance coverage of RMB18 million (0.1%) in the first quarter of 2026.

### **5. Green futures**

CCB Futures centres on green futures business, enhances services for the

industry chains of green varieties, flexibly uses futures derivative tools to develop non-listed futures varieties, and launches innovative weather index products, to further enrich green finance services and products. As of the end of the first quarter of 2026, cumulative exchange margin of green futures brokerage business had reached RMB19.114 billion, a year-on-year increase of 638%.

## **6. Green consulting**

CCB Consulting, through refining the green consulting business layout, focuses on providing consulting services for green industry project planning and project initiation, and offers customised financing scheme design and full-process financial advisory support for large-scale green infrastructure construction projects. Since 2026, CCB Consulting has supported branches in Henan, Shanxi, and Chongqing in assisting with the evaluation of 11 green projects, and supported the parent bank in identifying green loans exceeding RMB4.9 billion. CCB Consulting explores services related to carbon neutrality pilot projects for office buildings, develops “Carbon Peaking and Carbon Neutrality” business products to empower the parent bank's own operational premises, and supports relevant branches in energy conservation and carbon reduction. In the first quarter of 2026, the contract value of signed green business reached RMB15.73 million.

## **7. Green investment**

CCB Private Equity further expands the presence in the green industries of strategic significance through a model of “direct investment + external managed fund investment”. In terms of direct investment, CCB Private Equity focuses on critical technology fields such as energy storage and lithium batteries. As of the end of the first quarter of 2026, the green finance projects had directly invested with managed funds amounted to RMB1.865 billion. Through the comprehensive financial service model of “equity-debt combination” launched in collaboration with the Head Office and branches, CCB Private Equity strongly supported the development of green industries. In terms of investing in externally managed sub-funds, CCB Private Equity actively invests in high-quality external sub-funds through the strategic emerging

industries investment fund to further expand investment in green industries. As of the end of the first quarter of 2026, among the externally managed sub-funds invested with the strategic emerging industries investment fund, the number of investment projects in green fields was 160, an increase of five projects from the beginning of the year, covering multiple green industries such as new energy, new energy vehicles, new materials, and energy conservation and environmental protection.

CCB Principal Asset Management persists in advancing green investment. In terms of equity investment, as of the end of the first quarter of 2026, CCB Principal Asset Management had invested a cumulative total of RMB26.515 billion through equity investment channels in sectors such as the clean energy industry, energy conservation and environmental protection industry, clean production industry, green upgrading of infrastructure, ecological environment industry, and green services. In terms of fixed-income investment, as of the end of the first quarter of 2026, CCB Principal Asset Management had invested a cumulative total of RMB5.911 billion through bond investment channels in instruments such as green corporate bonds, green medium-term notes, green enterprise bonds, green financial bonds, green asset-backed securities, and green exchangeable bonds.

## **8. Green pension**

CCB Pension continues to expand the scale of green finance business, increase financial support in key areas, and promote the high-quality development of green industries. As of the end of the first quarter of 2026, the total green business volume of CCB Pension had reached RMB5.667 billion, an increase of RMB56 million compared to the beginning of the year. Among this, the balance of green bond investments stood at RMB3.557 billion, and the balance of green non-standard asset investments stood at RMB2.110 billion. In terms of new green business investments, five new green bond investments were added in this quarter, with a new investment amount of RMB534 million.

## **9. Green housing**

CCB Housing Rental clearly defines green requirements in project design, renovation and transformation, operation and management, and prioritises the

use of green and low-carbon building materials, green home appliances, and renewable energy systems, to create a safe, healthy, and comfortable living environment. 19 of the invested projects are national-standard or provincial-standard green buildings, accounting for 73% of the total number of projects. CCB Housing Rental has formulated the *ESG Action Plan of CCB Housing Rental Private Fund Management Co., Ltd.* to integrate ESG concepts into the strategic development, operation management, and corporate culture.

Through project practice and experience summary, based on the advancements of green and environmental protection technology in the construction industry, CCB Housing continuously explores the standards for green and low-carbon leasing, completes the *Guidelines for the Green Leasing of Long-Term Rental Apartments*, and steadily pushes forward the green and low-carbon leasing.

#### **10. Green consumption**

CCB Consumer Finance provides eligible customers with fully online self-service consumer credit services. The loan business of CCB Consumer Finance has been connected to the personal carbon account system, enriching personal carbon emission reduction measurement data and contributing to the improvement of “carbon account” financial services. As of the end of the first quarter of 2026, CCB Consumer Finance had served a cumulative total of 270.2 thousand emission reduction users, achieving a carbon emission reduction of 32.63 tonnes.

#### **11. Green wealth management**

CCB Wealth Management has deeply advanced green asset allocation. As of the end of the first quarter of 2026, the company's total investments in green finance assets had amounted to RMB30.136 billion, of which bond investments had reached RMB20.471 billion and asset-backed securities investments had reached RMB9.151 billion.

## II Financing Environmental Impact

The Bank continuously builds and strengthens the ESG risk management system, fully integrating ESG risk monitoring, assessment, and mitigation mechanisms into business decision-making and operational processes. The Bank systematically evaluates the transmission impact of ESG factors on risks such as credit, market, liquidity, reputation, operation and compliance risks, steadily advances the incorporation of ESG-related risks including environmental, climate, biodiversity, and information technology risks into the Group's risk appetite, and continuously strengthens the integrated management and control of ESG risks within the comprehensive risk management system. The Bank continuously improves the construction of the ESG risk-related management system, clearly defines management responsibilities at all levels, reviews and revises management guidelines in light of actual business conditions, deepens ESG risk review in the due diligence process for investment and financing businesses, and continuously explores, designs, and applies mechanisms linking ESG performance with product pricing. This promotes the deep integration of business development and ESG risk management, effectively empowering the green and low-carbon transformation of the economy and society.

### (I) ESG Risk Management System

#### 1. Regulatory policies

The Bank continuously strengthens the construction of ESG risk management system and follows the *Guidelines for Comprehensive Risk Management of Banking Financial Institutions* and the *Guidelines on Green Finance for the Banking and Insurance Sectors* to formulate and implement the *Measures on Environmental, Social and Governance Risk Management for Investment and Financing Businesses* (hereinafter referred to the “*ESG Risk Management Measures*”), which strongly guides and standardises the ESG risk management of the Bank.

As the top-level management policy for the ESG risk management system of the Bank, the *ESG Risk Management Measures* covers the Group's

corporate credit business, retail credit business<sup>4</sup>, financial market business, financial institutional business, investment banking business, etc., with clear specifications on the basic principles, organisational structure, risk identification and classification, investment and financing business process management, management tools, regulatory mechanisms and information disclosure. The Bank further refines the ESG risk management requirements for investment and financing clients, issues the *Notice on Strengthening Client Environmental, Social and Governance Risk Management*, clarifies the client ESG risk classification management requirements across the Bank, strengthens ESG risk management throughout the entire business process, strengthens supervision and inspection and problem rectification, and promotes the improvement of the Bank's ESG risk management professional level.

## **2. Management structure**

### **2.1 The Board and its special committees**

The Board takes the ultimate responsibility for ESG risk management, promotes the formulation of ESG-related policies and goals, and supervises and evaluates the implementation. The Risk Management Committee of the Board of Directors is responsible for supervising and guiding the management of ESG-related risks, including climate risks and opportunities. The Related Party Transaction, Social Responsibility and Consumer Protection Committee of the Board of Directors is responsible for studying and formulating ESG management policies and strategies, regularly monitoring and assessing the progress, and providing guidance and oversight on relevant information disclosure.

#### **2.1.1 Risk Management Committee of the Board of Directors**

The Risk Management Committee of the Board of Directors of the Bank is responsible for overseeing and guiding ESG-related risk management, including climate risks and opportunities. The committee regularly listens to analysis reports on environmental and climate-related risks and opportunities, studies climate change response measures, promotes the in-depth integration

---

<sup>4</sup> Refers to personal business loan.

of ESG elements into the comprehensive risk management system, continuously improves the stress test of climate-related risks, and guides the optimisation of the credit policy of the industry.

In the first half of 2026, the Risk Management Committee of the Board of Directors of the Bank held a total of 4 committee meetings, reviewed and approved the 2026 Risk Appetite Statement, integrated ESG risks into the Group's risk appetite, promoted the improvement of the ESG risk management system for investment and financing business, facilitated the integration of ESG risk control requirements into the entire process of investment and financing business, continued to increase the proportion of green loans, actively carried out the exploration of transformation of financial business, and actively contributed to biodiversity conservation.

### **2.1.2 Related Party Transaction, Social Responsibility, and Consumer Protection Committee of the Board of Directors**

The Related Party Transaction, Social Responsibility, and Consumer Protection Committee of the Board of Directors of the Bank is responsible for formulating the Bank's ESG overall planning (covering climate risks and opportunities) and supervising green finance and other business strategies. In the first half of 2026, the committee listened to the implementation progress in 2025 of the *Environmental, Social and Governance (ESG) Work Plan (2023–2025)* and discussed the progress of green finance.

### **2.2 Senior Management**

The Senior Management of the Bank is responsible for overseeing and guiding the ESG risk management work in investment and financing business, promoting and implementing specific ESG management work, comprehensively improving the Group's ESG management. The main responsibilities include:

- Formulating and implementing environmental and climate-related policies and reviewing ESG risk management systems in various business areas and business links;

- Implementing the day-to-day ESG risk management and dealing with major risk issues and reporting to the Board in a timely manner in accordance with regulatory requirements and management needs;
- Strengthening ESG risk management supervision and assessment and urging branches to perform ESG risk management duties.

The Management of the Bank sets up the ESG Promotion Committee and the Green Finance Committee (for the committee composition, please refer to “Corporate Governance – ESG Governance Structure”), chaired by the President, to regularly listen to the work progress report on the Bank’s ESG risk management system, studying and deploying tasks related to green finance and ESG risks in investment and financing.

- In December 2025, the ESG Promotion Committee held a meeting presided by the President of the Bank, listened to the report on the progress of ESG work and the report on advanced practices and insights in sustainable development from international peers, reviewed the *Procedures for Sustainable Information Disclosure*, and studied and deployed the key tasks in the next steps.
- In August 2025, the President of the Bank chaired a meeting of the Green Finance Committee to review progress on green finance initiatives, examine work related to Carbon Peaking and Carbon Neutrality in the Group's own operations, and deliberate on the first batch of candidates for the green finance talent pool, and made arrangements for the next steps in green finance business development and climate risk management.

The President of the Bank and other senior management members manage ESG risks in a timely and effective manner through the Executive Meetings, work sign-offs and other daily reporting mechanisms.

- The President, the Executive Vice President responsible for risk management and the Chief Risk Officer review the *Report on Environmental and Climate Risk Management* annually.
- The President chairs the meeting and approves the *Measures on Environmental, Social and Governance Risk Management for Investment and Financing Businesses* and supervises the implementation across the

Bank with the Executive Vice President responsible for risk management and the Chief Risk Officer.

- The President and the Executive Vice President responsible for risk management reviews and approves the *2025 Implementation Plan for High-Quality Development of Green Finance* and the *CCB Green Finance Talent Pool Development Plan*, among other key documents.
- The President, the Executive Vice President responsible for risk management and the Chief Risk Officer oversee the development of ESG rating tool for corporate customers, promote the use of rating results in actual work, and guide the integration of ESG factors into customer credit ratings by professional departments.

### **2.3 Professional departments**

The Bank has identified the leading department for ESG risk management in investment and financing businesses (the Credit Management Department of the Head Office), and builds a “three lines of defences” system for ESG risk management at the professional department level, ensuring timely and effective mitigation strategies for ESG risks in investment and financing businesses. The Bank strengthens information sharing and coordination, improves the quality and effectiveness of ESG risk management implementation, implements strict joint prevention and control to prevent cross contamination of risks, and continuously improves and optimises the ESG risk management mechanism in light of internal and external environments and business development needs.

- The first line of defence. The client management departments and investment and financing business departments: Responsible for implementing or urging branches and sub-branches to implement ESG risk management policies, processes and work requirements.
- The second line of defence. The risk management departments and internal control and compliance departments: The risk management departments are responsible for standardising, assessing, overseeing and reporting the ESG risk management activities of business departments. The internal control and compliance department is responsible for

supervising each business department's compliance with laws, regulations, regulatory requirements and internal rules and regulations.

- The third line of defence. The audit departments: Responsible for reconducting supervisions on ESG risk management, control and oversight systems.

## **(II) Credit Policies for Key Industries**

The Bank pays high attention to the ESG risks of clients and projects in various industries and formulates differentiated credit policies based on the attributes and business characteristics of different industries and in accordance with industry technical standards. The Bank specifies industry-wide technical indicators in the client and project access standards, and puts forward relevant requirements such as risk identification and prevention, and credit management strategies. Industry credit policies are strictly binding on credit business. The Bank has successfully issued credit policies for 79 industries, covering key industries such as agriculture, forestry, electricity, steel, mining, petrochemical, transportation, materials, and construction.

The Bank closely tracks industry development trends and regulatory policy directions, dynamically updating and reviewing the industry credit policies to ensure that all ESG risk management requirements in industry policies strictly comply with the review standards and internal control supervision of the overall credit policy. In the review process, the Bank deeply integrates ESG risk identification and assessment, follows regulatory policy requirements and with reference to industry standards and conventions involved in the policies, continuously enriches the identification of ESG risk factors in key industries, reasonably sets ESG risk management thresholds for industries, and studies and expands ESG risk-related restrictive requirements and management measures. This ensures the binding force, applicability, and feasibility of credit policy norms, supporting the construction of a scientific, orderly, and enforceable closed-loop ESG risk management system.

### **1. Credit policies for key industries**

#### **1.1 Agriculture and forestry**

The Bank actively supports the green development of agriculture and forestry. In accordance with the requirements for the comprehensive green transformation of agriculture set out in the *Plan for Accelerating the Building of a Strong Agricultural Nation (2024–2035)*, and with reference to international conventions including the *United Nations Convention to Combat Desertification*, the *Convention on Biological Diversity*, the *Convention Concerning the Protection of the World Cultural and Natural Heritage*, the *International Convention for the Protection of New Varieties of Plants* and the *International Plant Protection Convention*, the Bank formulated the *Credit Policy for Agricultural Industry* and the *Credit Policy for Forestry, Animal Husbandry and Fishery Industry*. The Bank emphasises compliance, environmental protection, quality and safety, climate and biological disaster risk resilience in the selection criteria for agricultural and forestry clients, and implements the “one-vote veto” for environmental and climate-related risks, and rejecting credit access to clients and projects with significant environmental and climate-related risks. The Bank clearly defines energy-saving and environmental protection requirements, requiring agricultural clients to fully apply low-toxic or slightly toxic pesticides, and the average per-acre application of pesticides and fertilisers in the past three years needs to have been optimised or stable. It is prohibited to be engaged in clients and projects involving illegal introduction and release of invasive alien species such as crop and forest grass seeds and seedlings. It is clearly stipulated that relevant clients with high pollution and high energy consumption shall not be involved, including: highwater-consuming crop planting enterprises located in areas with severe water overload, enterprises that do not meet environmental protection standards and do not have the ability to reduce pollution and carbon emissions, and enterprises notified by regulatory authorities for excessive pesticide residues and improper application of fertilisers. The Bank makes agriculture a priority support industry, actively supports agricultural business entities to carry out emission reduction and carbon sequestration, integrated use of resources and construction of efficient water-saving farmland drainage and irrigation facilities, increases credit extension for green transformation and upgrading and energy-saving clients such as saving fertilisers, pesticides, water and land, etc. The Bank makes forestry a priority industry, actively contributes to ecological protection and

restoration, enhances forest reserves, and strengthens the capacity of carbon sinks.

Key focus of credit review include: negative impacts of agriculture on natural habitats/protected areas, soil erosion or degradation, fertiliser and pesticide pollution, impacts of crop types on local biodiversity, excessive consumption or pollution of water sources, and other factors. Climate risks such as floods, droughts, severe cold, and typhoons, as well as biological disaster risks such as pests, diseases, and weeds occur in agricultural and forestry production are also incorporated.

## **1.2 Power industry**

The Bank co-ordinates energy supply guarantee and energy green and low-carbon transition, focuses on the safe and reliable supply of renewable energy and the steady and orderly replacement of conventional energy, and increases financial support for energy system construction. In accordance with the *Several Opinions on Promoting the Healthy Development of the Power Generation of Non-Hydraulic Renewable Energy*, the *Catalogue for Guiding Industry Restructuring (2024 Version)*, the *Benchmark Level and Benchmark Level in Key Areas of Clean and Efficient Coal Utilisation (2022 Version)*, the *Guidance of the National Development and Reform Commission and Other Departments on Vigorously Implementing Renewable Energy Substitution Action*, the *Action Plan for Accelerating the Establishment of a New Power System (2024-2027)*, and the *Action Plan for the Low-Carbon Transformation and Construction of Coal-fired Power (2024-2027)* , and with reference to international conventions and agreements, including the *United Nations Framework Convention on Climate Change* and the *Paris Agreement*, the Bank has formulated the *Credit Policy for Wind Power Generation Industry*, the *Credit Policy for Photovoltaic Power Generation Industry* and the *Credit Policy for Thermal Power Generation Industry*, etc. The Bank pays close attention to and actively identifies ESG risks involved in projects in the power industry, assesses the importance of relevant risks and their impact on credit risk. The Bank specifies requirements on pollutant emissions and coal consumption in the selection criteria for thermal power projects, resolutely withdraws from backward coal-fired power units with a capacity below 300,000 kilowatts that

have been eliminated by national regulations, resolutely withdraws from backward production capacity projects that have been eliminated by national regulations, supports the “three reforms” (energy-saving and carbon-reducing reform, heat supply reform, and flexibility reform) of coal power enterprises, supports the promotion of low-carbon coal-fired power technology transformation and application such as zero-carbon or low-carbon fuel blending, carbon capture, utilisation and storage of coal-fired power units according to local conditions, and does not intervene in illegal coal-fired power construction projects.

Key focus of credit review include: consideration of high carbon emissions from the combustion of fossil fuels and exhaust emissions should be in line with the energy efficiency levels specified by national regulation, with a high degree of attention paid to environmental protection and compliance risks, and concerns that the construction of hydroelectric power generation should satisfy factors such as green and harmonious development, low environmental impact, and proper resettlement of relocated residents.

### **1.3 Mining industry**

The Bank pays close attention to and actively identifies ESG risks involved in projects related to the mining industry. In accordance with policy documents including the *Opinions of the National Energy Administration on Accelerating the High-quality Development of Coal Preparation and the Benchmark and Baseline Levels for Key Areas of Clean and Efficient Coal Utilisation (2025 Version)*, the Bank has formulated the *Credit Policy for the Coal Industry*, assessing the level of significance of risks such as corporate and project compliance, safe production, and energy transformation, and the degree of impact on credit risk. The Bank supports green, clean and smart mining, takes production safety, environmental protection and clean and efficient resource utilisation as the access criteria for client and project selection, and focuses on supporting the supply of scarce and strategic new types of minerals that are in line with green mines, conservation and efficiency, and environmental friendliness. The Bank implements a “one-vote veto” for environmental and climate-related risks, denies credit access to clients and projects with significant environmental and climate-related risks, and resolutely compresses and

withdraws from non-compliant production capacity, backward production capacity, and enterprises that fail to meet environmental protection and production safety standards that are not in line with the national industrial policy. The Bank does not support coal mine projects with major safety hazards such as coal and gas outbursts, spontaneous combustion and fire, impact ground pressure, and water hazards. It is prohibited to be involved in coal mines with prominent safety hazards, depleted resources, and those that do not meet the standards of the “three lines and one list” (ecological protection red line, environmental quality bottom line, resource utilisation upper limits, and ecological environment access list), as well as projects that do not meet environmental protection standards, have backward production capacity, and illegally increase production capacity.

Key focus of credit review include: consideration of coal mining processing safe and green mining technology, reaching environmental protection standards, increasing new capacity in accordance with the law, does not belong to the backward production capacity, no production safety hazards and other factors.

#### **1.4 Petrochemical industry**

The Bank pays close attention to and actively identifies ESG risks involved in projects related to the petrochemical industry. In accordance with the *Catalogue for Guiding Industry Restructuring (2024 Version)*, the *Plan for the Layout of the Petrochemical Industry*, the *Action Plan for Accelerating the Renovation and Upgrading of Old Facilities in the Petrochemical and Chemical Industry (2026–2029)*, the *Work Plan for Stabilising Growth in the Petrochemical and Chemical Industry (2025–2026)* and the *Special Action Plan for Energy Saving and Carbon Reduction in the Refining Industry* and other policy documents, the Bank formulated the *Credit Policy for Petroleum Refining Industry* and the *Credit Policy for Petrochemical Industry*, to assess the significance level of relevant risks and the degree of impact on credit risk. The Bank supports the green and safety, low-carbon circular development of the petrochemical industry, takes safe production, clean production, energy efficiency level, emission level, and capacity utilisation level, as the access criteria for client and project selection, and selectively supports energy-saving

and carbon-reducing renovation and upgrading, equipment upgrading and reconstruction, product upgrading, upstream and downstream integration and development and optimisation of the layout of production capacity of high-quality enterprises in the petrochemical and chemical industries, as well as the projects with a leading energy-efficiency level in the four petrochemical industry clusters and the green industrial parks. The Bank pays close attention to the impact of enterprise production and project construction on energy consumption, carbon emissions, ecological environment and biodiversity, etc., and implements a “one-vote veto” on environmental and climate-related risks, prohibits credit access to clients and projects with significant environmental and climate-related risks. The Bank optimises the layout of petrochemical projects, does not intervene in new production capacity projects in key areas for air pollution prevention and control, resolutely withdraws from projects that do not comply with “three lines and one list” under national industrial planning, capacity replacement, coal consumption reduction, substitution and cutting, as well as from enterprises that do not meet the requirements for green and low-carbon development, and that have high environmental and climate-related risks. The Bank compresses and withdraws from enterprises with high environmental risks, as well as other enterprises that have been included in the scope of outdated production capacity under the elimination and prohibition categories.

Key focus of credit review include: consideration on the adoption of technologies such as fully enclosed and automated production in the oil refining process, the project’s location in a chemical park, the completion of land use, environmental assessment and other permits, and the compliance of energy efficiency, carbon emission intensity and clean production with national regulatory requirements. Attention is paid to the requirements for safe production of enterprises, and the timely withdrawal of projects with potential safety hazards. The Bank also conducts continuous tracking of enterprises’ sewage discharge and environmental information, and review of ecological and environmental protection measures, as well as the impact on environmental diversity, etc.

### **1.5 Iron and steel industry**

The Bank supports the green development and transformation and

upgrading of the iron and steel industry. In accordance with the *Guiding Opinions on Promoting the High Quality Development of the Iron and Steel Industry*, the *Catalogue for Guiding Industry Restructuring (2024 Version)*, the *Benchmarking and Basis Levels of Energy Efficiency in Key Industrial Sectors (2023 Version)* and other policy documents, the Bank formulated the *Credit Policy for the Iron and Steel Industry*, which incorporates energy consumption, pollutant emissions and other requirements into the admission criteria for clients and project selection. The Bank pays close attention to the impact of project construction on the dual-control of total energy consumption and intensity, carbon emissions, ecological environment and biodiversity, and does not support clients with backward production capacity, safety and environmental protection that do not meet standards and have no hope of rectification. The Bank implements the “one-vote veto” on environmental and climate-related risks, prohibits credit access to clients and projects with significant environmental and climate-related risks, resolutely withdraws from projects that do not comply with national industrial planning and environmental protection policies and enterprises that fail to meet environmental protection and production safety standards.

### **1.6 Biodiversity conservation**

The Bank pays close attention to the implementation of ecological environment and biodiversity protection in investment and financing business activities. During the implementation of projects in some industry impacts may be posed on soil, atmosphere, forests, and biological habitats, thereby triggering or bearing the consequences of biodiversity and ecosystem degradation. The Bank prudently evaluates the impacts of clients or projects on ecosystems in the credit granting process, strictly follows the laws, regulations and rules on the protection of biodiversity, and strictly abides by the requirements of ecological protection red line, environmental quality bottom line, resource utilisation upper limits and ecological environment access list. The Bank sponsors the signing of the *Common Action Programme for Banking Financial Institutions to Support Biodiversity Conservation*, implements the Ministry of Ecology and Environment’s *China’s Biodiversity Conservation Strategy and Action Plan (2023-2030)*, refers to international conventions such

as the *Convention on Biological Diversity*, actively implements the “Kunming-Montreal Global Biodiversity Framework”, does not support projects, behaviours, operations that seriously harm biodiversity, prohibits involvement in projects that damage ecological protection areas, prohibited construction areas and ecological habitats, and does not involve in projects that have an effect of deforestation and the ruining of grasslands, destruction of wild animal and plant resources, destruction of marine ecological environment, illegal fishing and poaching, and actively contributes to enhancing the diversity, stability and sustainability of the ecosystem.

In the annual credit policy, the Bank clearly requires helping biodiversity conservation, actively supporting the integrated protection and restoration projects of mountains, rivers, forests, farmlands, lakes, grasslands and deserts, and major ecological projects. Focusing on the overall planning layout of major projects for ecosystem protection and restoration of the “Three Regions and Four Belts”, the Bank serves the construction of the national ecological security barrier system, and actively supports the “Three Norths” project, the Yangtze River Economic Zone, the ecological protection of the Yellow River Basin, the comprehensive prevention and control of desertification, the restoration of rivers, lakes and wetlands, and the shoreline regulation and restoration. The Bank’s credit policies for steel, oil refining, wind power and photovoltaic power generation industries clearly require strengthening the awareness of ecological protection, strictly comply with the requirements of the red line of ecological protection, the bottom line of environmental quality, the upper limit of resource utilisation and the ecological environment access list, and closely follow up the impacts of the construction of the projects on the ecological environment and biodiversity.

## **2. Policy review, approval, and implementation guidance**

The Bank continues to strengthen credit policy review, approval and guidance across various sectors by issuing review and approval guidelines, industry research reports, and project assessment manuals. These efforts aim to promote unified credit granting standards across the Bank. ESG risks are incorporated as key considerations in the formulation of industry-specific review and approval strategies. Some examples of review and approval guidelines for

key industries are listed below:

- In the review and approval guidelines for the coal-fired power generation industry, the Bank clearly advocates for the active support of clean and efficient coal-fired power utilisation. These guidelines encourage a coordinated approach to the energy-saving and carbon reduction retrofitting of existing coal-fired power units, as well as the flexibility modification and heating system upgrades.
- In the review and approval guidelines for the photovoltaic industry, the Bank highlights that photovoltaic projects require substantial land area, and their construction may impact the ecological environment and biodiversity. The guidelines emphasise that (1) ecological protection awareness must be strengthened, and the red line of ecological protection must be maintained. A thorough verification of project land use, electric transmission lines, and booster stations is required to ensure they do not involve ecological protection zones or prohibited construction areas. Projects with such issues are strictly prohibited from approval. Additionally, for existing projects, timely checks on land and environmental permits must be conducted to prevent suspension, demolition, or disconnection from the grid due to ecological concerns, thereby safeguarding credit asset security; (2) Particular scrutiny should be applied to photovoltaic power generation projects and associated electric transmission lines and booster stations regarding their occupation of basic cropland and forest land. Special attention must be given to whether projects occupy basic grasslands; if so, the applicant institution must confirm whether the project owner has signed compensation agreements for grassland requisition with relevant authorities, collectives, and individuals, and whether these parties consent to the grassland expropriation and occupation.
- In the review and approval guidelines for the textile industry, the Bank clearly requires attention to environmental protection risks. It is specified in the section of key review areas that a strict “one-vote veto” policy on environmental protection shall be enforced for textile dyeing and printing enterprises. All such enterprises must provide valid discharge permits issued by local environmental authorities, with annual inspections

confirming compliance. A comprehensive investigation shall be conducted on the production facilities, technological processes, main products of textile enterprises, and the discharge of dyeing and printing enterprises. The Bank refrains from engaging with enterprises involved in environmental violations that cannot be rectified. For enterprises repeatedly penalised for environmental breaches, the credit granting strategy will be promptly re-evaluated.

- In the review and approval guidelines for the biopharmaceutical industry, the Bank explicitly requires attention to environmental and social risks, with a particular focus on the compliant disposal and management of wastewater, exhaust gases, solid waste, biologically active or toxic by-products and intermediates generated during pharmaceutical manufacturing processes. Clients should hold valid *Manufacturing Licenses for Medicinal Products* and GMP certification for their production lines, meet environmental protection standards, have had no major quality incidents and no product recalls in the past three years, and have no non-compliance findings or penalties during routine unannounced regulatory inspections.
- In the review and approval guidelines for lithium-ion battery anode material manufacturing, “one-vote veto” policy on environmental protection is established. For clients triggering the following conditions, a credit shrinking and withdrawal strategy must be implemented: for environmental non-compliance, the enterprise fails to meet the emission standards for various pollutants, including noise, wastewater, exhaust gases, and solid waste, as specified in the *Emission Standard of Pollutants for Battery Industry (GB30484)*; for technical non-compliance, the specific capacity and production energy consumption of the lithium-ion battery anode materials do not meet the standards set out in the *Lithium-Ion Battery Industry Norms (2024 Version)*; for other significant risks, the enterprise or its actual controller faces major reputational risks, such as non-performing loans, financial fraud, involvement in organised crime, etc.

### **(III) Due Diligence Process**

The Bank pays close attention to the impact of ESG risk factors on overall credit risk in investment and financing business activities, continuously strengthens the identification, assessment, monitoring and prevention of ESG risk in investment and financing business activities, clarifies the working mechanism of ESG due diligence and ESG risk classification, and formulates mitigation measures in conjunction with ESG risk assessment. ESG risk management is embedded in the whole process of credit investigation, assessment, approval, lending and inspection, comprehensively covering the key links of pre-loan, in-loan and post-loan management, and promoting the application of ESG risk classification results in the work of client access, credit rating, credit approval and credit asset risk classification, so as to promote the virtuous cycle and sustainable development of investment and financing business.

### **1. Regulatory policies**

The Bank's *ESG Risk Management Measures* clearly stipulates that for investment and financing businesses such as corporate credit business, retail credit business, financial market business, financial institutions business, investment banking business, etc., each branch shall comprehensively, prudently, deeply and carefully investigate and assess the ESG risks of clients when accepting business and conducting due diligence.

The Bank has issued the *Notice on Strengthening Client Environmental, Social and Governance Risk Management*, which clarifies the requirements on the classified management of clients' ESG risks across the Bank, requiring tighter control over ESG risks throughout the business process. In accordance with the *Key Points for Due Diligence on Environmental, Social and Governance Risks*, the Bank collects information about clients' ESG management and potential ESG-related violations of laws and regulations.

The Bank has released the *Notice on the Launching of the Application Integrating ESG Elements into the Client Credit Rating*, which guides all employees across the Bank to attach great importance to and earnestly study the main contents of integrating ESG elements into client credit rating, to strengthen the management of rating operations, continuously improving ESG

risk management.

## **2. ESG due diligence process**

### **2.1 Basic principle**

In the ESG due diligence, the Bank conducts ESG risk assessment based on the basic principles of full-process management, materiality, prudence and differentiation, and requires business handling institutions to fully consider ESG risk factors such as the client's industry, region, environmental impact, social impact, operation and management capabilities, project construction management capabilities, and upstream and downstream enterprises and contractors, identifies ESG risk factors in the investment and financing business process, and analyses and judges the possible impact on assets safety.

In response to the identified ESG-related risks, the Bank has established ESG-related risk classification standards and promoted the implementation of risk grading management measures and responding plans according to the nature and severity of the risks. The departments responsible for credit approval and the departments responsible for investment would implement reasonable and differentiated credit approval and investment strategies, the business handling branches or institutions conduct regular ESG risk grading re-examinations, continuously improving the risk escalation management mechanism for scenarios involving risk escalation identified in due diligence.

The Bank's ESG risk response initiatives include, but are not limited to: setting limit standards for environmental protection indicators, adjusting the credit scheme, increasing the capital ratio, suspending new credit, compressing existing business, requiring rectification of laws and regulations violations, signing special commitments, increasing frequency of enhanced reviews, and expanding focus on ESG factors, etc. The Bank strictly restricts credit granting or investment to clients who have serious violations of laws and regulations or major risks in environmental, social and governance aspects.

### **2.2 Management function**

The Bank clearly stipulates the management responsibilities of the Head Office and branches for ESG risk management in investment and financing in the *ESG Risk Management Measures*, effectively regulating and guiding the

implementation of ESG due diligence in investment and financing businesses.

The Credit Management Department of the Head Office is responsible for formulating and improving the ESG risk management measures for investment and financing businesses, and specifying ESG risk management requirements in the basic policies and systems for credit risk management. For ESG risk assessment, the department is responsible for formulating specific standards for clients' ESG risk classification and list-based management requirements, monitoring and providing early warning of clients' ESG risks, and formulating differentiated credit policies for industries subject to key national regulatory restrictions and those with significant risks.

The Credit Approval Department of the Head Office is responsible for implementing ESG risk management requirements in the credit approval process, formulating differentiated approval procedures, authorisation plans, and strategies. The department issues approval guidelines for industries subject to key national regulatory restrictions and high-risk industries, and cooperates in completing reporting on ESG risk-related matters.

The departments responsible for customer management and the departments responsible for investment and financing businesses of the Head Office are primarily responsible for the implementation and supervision of ESG risk management requirements. The departments' specific responsibilities include guiding and supervising branches in implementing ESG requirements in due diligence, post-investment and post-loan management, and product management, collecting basic ESG data on clients, conducting risk assessment, classification, and review, implementing list-based management of clients with ESG risks; supervising branches in resolving major ESG risk issues, and cooperating in reporting relevant risk situations.

The Bank's branches are responsible for coordinating the implementation of ESG risk management requirements throughout the entire investment and loan process. The departments responsible for customer management and the departments responsible for investment and financing businesses, as the executing entities, are responsible for collecting ESG-related information on clients and their supply chains and ensuring the accuracy, completeness, and

timeliness of the information. The departments are also responsible for conducting risk assessment and classification, pre-investment and pre-loan compliance review, list-based management and risk resolution, and cooperating in monitoring and early warning and reporting major matters to the risk management department. The department responsible for risk management is responsible for monitoring and providing early warning of ESG risks, reviewing the accuracy and timeliness of risk classification results, cooperating in implementing list-based management, and taking the lead in reporting major ESG risk matters.

## **2.3 Implementation performance**

### **2.3.1 Credit business**

The Bank explicitly requires that the initiation of project assessment should comply with the requirements of ESG-related risk management, and show whether it has obtained necessary environmental impact assessment documents. If a client has a major ESG-related risk incident, including being rated as an enterprise with an environmental protection warning or an enterprise with bad environmental protection performance in the enterprise environmental credit evaluation, being involved in a lawsuit for environmental or climate reasons and it may have a significant adverse impact on the enterprise, being ordered by relevant government authorities to shut down, violating laws and regulations and the violation is difficult to be rectified, and other situations in which major environmental and climate risks and hidden dangers arise, a review of the group comprehensive financing limit and the single-account comprehensive financing limit shall be promptly initiated. In the entire process of credit granting, any instances of environmental violations for which rectification measures have not been approved by the authorised environmental protection authorities shall not be declared, accepted, and approved, and the existing business shall be reduced and withdrawn.

The *Notice on Adjusting the Content Related to ESG in the Comprehensive Financing Declaration Materials* of the Bank clearly stipulates the contents about “Social, Environmental and Climate Risk Investigation” in client survey and evaluation reports. The contents shall include: the final classification result

of clients' ESG risks ("four colours and five categories"), classification description, the ESG-related violations of laws and regulations in the last three years or three years ago that have not been rectified (if any), the potential ESG risk points of the clients (or projects), and the ESG risk management measures to be taken by the clients (or projects). The compliance review personnel for corporate credit should state the clients' ESG risk classification result in the compliance review opinion form. For clients with a non-green classification in the "four colours and five categories", the reasons should be explained and risk warnings should be properly given.

➤ **Client approval**

- The Bank assesses clients' ESG-related risk management performance, collects information about clients' ESG management in line with the *Key Points for Due Diligence on Environmental, Social and Governance Risks*, and focuses on reviewing the authority and completeness of risk compliance documents as well as the legality of relevant procedures with reference to the *Compliance Documents for Environmental, Social and Governance Risks and the Compliance Risk Review Checklist*.
- The Bank conducts compliance risk review. The handling institutions should focus on reviewing the authority and completeness of risk compliance documents as well as the legality of relevant procedures, and check whether relevant risk points are sufficiently highlighted and explained in the compliance documents submitted by customers.
- The Bank pays attention to the possible impact of the production and operation of enterprises and project construction on the environment as well as the completeness and effectiveness of their environmental protection measures, and strictly control client access. The Bank pays close attention to industries with potential environmental risks.
- The Bank does not issue loans to projects without environmental impact assessment report. Regarding clients and projects that do not meet national policies or regulatory requirements or environmental protection standards, or have environmental and climate violations and

have not completed relevant remediation, being rated as an enterprise with an environmental protection warning or an enterprise with bad environmental protection performance in the enterprise environmental credit evaluation, being involved in a lawsuit for environmental or climate reasons and it may have a significant adverse impact on the enterprise, being ordered by relevant government authorities to shut down, as well as have other major environmental and climate risks, customer approval and credit balance increase will be strictly controlled. Regarding those projects which have completed relevant remediation, the Bank requires operations to comprehensively assess the severity and possibility of recurrence of the environmental violations and the overall impact of relevant penalties on enterprises' operations. For those with serious problems, bad influence, repeated violations or problems that cannot be rectified, the Bank requires reducing or withdrawing from relevant business.

- The Bank improves the application materials for the full processes involving comprehensive credit granting, project evaluation and credit approval to present information related to environmental factors such as carbon emissions, including carbon peaking situation in regions where the client operates, whether the industry belongs to the key areas for promotion and control of Carbon Peaking and Carbon Neutrality, major environmental benefits, contribution to carbon emission reduction, and other relevant information.
- The Bank adds green finance evaluation contents to project evaluation and guides business handling institutions to pay attention to the energy conservation, emission reduction, pollution control, etc., of projects. The Bank optimises the main indicator parameters for project evaluation and reflects analysis and evaluation results in the evaluation report to make the project evaluation more targeted, standardised and scientific, providing a decision-making basis for project selection and credit strategies.

➤ **In-loan review**

- The Bank implements differentiated credit approval strategies based on the classification results of ESG risks of clients.
- When signing contracts with customers, branches should urge customers to strengthen ESG risk management by improving contract terms.
- At the funding stage, branches should, on the basis of meeting the requirements of dynamic assessment and risk classification, proactively conduct ESG risk assessment in relevant phases, such as the design, preparation, construction, completion, operation, and shutdown, of approved credit and investment projects.
- The Bank reviews the final classification result of clients' ESG risks and corresponding explanation, the potential ESG risk points of the clients (or projects), and the ESG risk management measures to be taken by the clients (or projects).

#### ➤ **Post-loan management**

- The Bank integrates ESG risk management into the scope of post-loan inspection conducted either on site or off site, to pay continuous attention to changes in clients' ESG risk levels.
- For customers with the ESG risks classified as red (exit category) or yellow II (rectification category), the business owning branches or institutions should conduct on-site inspections at least once every six months, to check the implementation of the measures related to ESG risk prevention stipulated.
- For new ESG risk events, clients should be informed of the subsequent rectification measures and rectification progress arrangements in a timely manner. For red (exit category) and yellow II (rectification category) clients, special risk prevention and control measures and response plans should be studied and formulated.

#### **2.3.2 Bond underwriting**

In bond underwriting business, the Bank requires bond issuing clients to abide by the ESG risk management process requirements for investment and

financing business. In terms of client and project selection, business access, etc., the Bank strictly reviews the ESG performance such as energy efficiency, greenhouse gas emissions and pollutant discharge, environmental governance strategies and performance, employee rights protection and talent development, management structure and business strategy. During client and project selection, the Bank conducts stage-by-stage review for ESG risk intensive clients such as steel, coal, and thermal power enterprises to enhance management requirements. During business approval, the client's ESG risk control system and management level, production and operation and pollution permits obtained, production process and energy efficiency utilisation level in the industry, ESG risk related factors such as regulatory authorities' environmental safety violations and rectification records, are taken as important contents of due diligence.

### **2.3.3 Investment**

In terms of investment business in the financial market, the Bank continuously optimises business philosophy, integrates ESG elements into annual business strategies, and gives priority to supporting the key areas that are in line with the national strategic orientation and conducive to the green and sustainable development of the real economy, as well as the issuers with outstanding ESG performance. In investment decision-making, the Bank has established an ESG information collection and tracking mechanism to regularly collect ESG data from the internal systems of the issuers' portfolio, as well as ESG rating data from the public market, evaluates and analyses the progress of responsible investment work, and dynamically adjusts the investment strategy according to evaluation results. The Bank continuously improves the post-investment management framework, pays close attention to ESG-related risks, and integrates ESG assessment metrics into bond duration management. The Bank has established a responsible investment working mechanism, and designates employees dedicated to the work; the Bank takes a goal-oriented approach, and makes responsible investment part of the goals. The Bank promotes the concept of responsible investment and shares research results across the Bank, to raise relevant employees' understanding of and professional capabilities in responsible investment.

### 3. Trigger factors and risk escalation process

The Bank regularly conducts ESG risk factor assessments and due diligence in investment and financing businesses, regularly reclassifies and reassesses the ESG risk levels of clients, and based on the results of the assessment, upgrades, downgrades or maintains the level of ESG risk, and accordingly adopts differentiated risk management strategies to deepen ESG risk mitigation measures.

#### 3.1 Classification standard

The Bank has established an ESG risk management system. The *ESG Risk Management Measures* clearly stipulates that ESG risks of clients are classified according to the ESG comprehensive management level of the clients (or projects), the severity and frequency of negative ESG issues, the status of rectification, and the industry or region in which the investment is invested. The risk levels are classified into “four colours and five categories” according to nature and severity, namely green (normal category), blue (concern category), yellow I (observation category), yellow II (remediation category), and red (exit category), so as to strengthen ESG risk management of investment and financing business through classified measures.

- Normal Category: Clients (or projects) hold a robust level of overall ESG management with no negative ESG issues in the past three years or only a few minor negative ESG issues (rectification has been completed).
- Concern Category: Clients (or projects) with a good level of comprehensive ESG management, and in the past three years, there are a few minor negative ESG issues (rectification has been completed); or, in the past three years, a few general or above negative ESG issues (rectification has been completed and the observation period has been exceeded) negative public opinion; or they have invested in industries or regions that are relatively sensitive in terms of ESG risks.
- Observation Category: Clients (or projects) with an average level of comprehensive ESG management, and there are general and above negative ESG issues (rectification has been completed and is under observation period); or, in the past three years, there are repeated general

or above negative ESG issues (rectification has been completed and the observation period has been exceeded) public opinion; or the investment is made in ESG risk-sensitive industries or regions.

- Rectification Category: Clients (or projects) with a weak level of comprehensive ESG management and there are negative ESG issues for which rectification has not been completed.
- Exit Category: Clients (or projects) have had significant negative ESG issues, which represent or are likely to represent a significant risk to the Bank.

The Bank clearly stipulates that branches and sub-branches review the classification of clients by ESG risks at least once a year. For clients that are classified as red or yellow II, dynamic ESG risk assessment shall be evaluated on a quarterly basis. A review of the classification shall be initiated in a timely manner in the event of a change in relevant environmental protection laws and regulations, industrial policies, industry access policies, or in the client's own ESG conditions.

### **3.2 Triggers**

The Bank has clearly defined the factors triggering risk escalation management, including negative public opinion incidents, systemic risks in the governance structure, significant changes in ESG risk performance, regulatory penalty notifications, changes of third-party ESG assessment/rating. If any of these situations triggers ESG risk escalation, the Bank's business owning branches or institutions will promptly initiate a re-inspection of ESG risk classification. Specific scenarios include:

- In the last 3 months, the clients (or projects) received notifications, punishments, or were included in any blacklists or key monitoring lists by financial supervisory authorities, as well as by the authorities in charge of development and reform, environmental protection, food and drug supervision, price control, safety supervision, taxation, finance or there are major disputes that adversely affect normal construction, production and business activities.

- In the last 3 months, the clients (or projects) experienced issues that had a significant impact on environmental, social, and governance, such as negative media coverage, mass incidents, or changes in regional or industry environmental standards.
- Significant governance changes occur, such as asset restructuring, significant shareholding changes, frequent changes in senior management, or significant changes to the articles of association of the listed company.
- Changes occur in the clients' environmental, social, and governance assessment by a qualified, independent third-party or relevant authority.
- Regulatory inspections and internal or external audits require adjustments to ESG classification results, or significant changes occur in the client's ESG risk rating results.
- The ESG risk classification results of the client are no longer valid, the validity of the classification results is about to expire, or the classification results need to be assessed or re-examined as required during the validity period, etc.

### **3.3 Risk escalation management**

The Bank has clearly defined mechanisms for handling risks at each level across all categories of ESG risk classifications. For clients whose risk levels are escalated or deescalated in the re-inspection of ESG risk classification, the Bank, in line with the ESG risk classification standards, continues to refine and implement the risk escalation management mechanism, and further standardise the implementation of ESG due diligence at a deeper level. If the risk level is escalated to red (exit category), yellow II (rectification category), or yellow I (observation category), the clients will be included in the scope of ESG risk list-based management; relevant branches are required to urge the customers to formulate ESG risk response plans, and to establish a mechanism for sufficient and effective communications with stakeholders and take corresponding management measures according to the escalated risk level. Among which, normal and concern category: cases shall be handled in accordance with credit approval rules and procedures; observation category: approvals shall be carried out by different-level institutions based on different

business scenarios including new client onboarding and existing clients conducting new business; rectification category: except for special circumstances, new customers shall not be admitted, and existing customers are not allowed to apply for any new services; exit category: except for special circumstances, new customers shall not be admitted, with approval authority for new project loan business centralised at the Head Office, existing customers are not allowed to apply for any new services, and the existing projects will be phased out.

The Bank issued a *Notice on Adjustment of Approval Authorisation for Comprehensive Financing for Corporate Clients*, transferring to the Head Office the approval authority for part of business on loans for capacity-expanding projects in the five major industries with serious overcapacity (iron and steel, cement, flat glass, shipbuilding and electrolytic aluminium), the coal chemical industry, coking and coal production industry, and thermal power industry and other industries with high environmental, social and climate-related risks, expanding the authorisation of low-carbon business and providing differentiated approval and authorisation policies for green credit whitelisted clients. Furthermore, for enterprises that fail to comply with national policies and regulatory requirements, violate laws and do not complete the rectification, hold environmental credit evaluations indicating warnings or a poor environmental protection record, are involved in environmental and climate-related lawsuits with the potential for significant adverse impacts, or are mandated by the government to shut down, as well as for other clients and projects with significant environmental and climate risks, the Bank implements a “one-vote veto” on environmental and climate risks and does not grant credit access. Prior to the completion of rectification by existing clients, the credit balance or loan balance is not allowed to be increased (unless it is for the credit business intended for risk mitigation). Clients and projects that pose significant problems, have negative impacts, repeated offences, or cannot be rectified will be promptly reduced and withdrawn.

The Bank continuously optimises the management requirements related to differentiated ESG risk. In terms of approval authority, clients included in the “Green Credit Whitelist” or the “Transport, Water Conservancy and Power

Whitelist” may benefit from expanded approval authority limits for both single-customer comprehensive financing and single transactions. In terms of project assessment, green loans below RMB100 million may adopt simplified assessment procedures, green loans structured as syndicated loans may directly adopt external assessments conducted by China Development Bank or Industrial and Commercial Bank of China, and multiple projects meeting specific conditions (such as distributed photovoltaic projects) may be assessed on a portfolio basis. In terms of application materials, all corporate customers are required to disclose their final ESG classification results to the Bank as part of credit applications. In terms of processes and mechanisms, the credit approval operating procedures for small and micro enterprises are aligned with those for large and medium-sized customers by explicitly requiring the initiation of credit re-examination in the event of material environmental or climate risk events. In terms of performance evaluation, branches that actively support the first line of defence and achieve above-median approval growth in key areas such as green finance may be awarded additional performance scores.

The Bank conducts ESG risk review in the investment and financing business. As of the end of the first quarter of 2026, the Bank had completed ESG risk classification for 99.73% of the Bank's corporate loan customers. The reviewed aspects include:

- The actual energy efficiency level, comprehensive energy consumption, energy structure, greenhouse gases and emissions of major pollutants of the client's main products, the implementation of cleaner production, ultra-low emissions renovation, and the results of environmental credit evaluation.
- The impact of the client's production and operation on the ecological environment and biodiversity, and the main measures taken by the client to reduce greenhouse gas emissions, pollution prevention and control, and ecological environment and biodiversity protection.
- Whether the client faces public opinion incidents on ecological protection, social impact, and biodiversity.

- Problems, penalties, and rectifications found, imposed, or required by ecological and environmental protection inspection teams, ecological and environmental authorities, etc.

#### **Case: ESG risk escalation management**

- In April 2026, the Xiamen Branch of the Bank identified a piece of external adverse ESG-related news regarding a construction and development company, following a sudden safety incident at one of its construction sites. The Branch promptly organised relationship managers to conduct post-loan inspections and analysis, and carried out a reassessment of the client's ESG risk classification. The client's ESG risk rating was downgraded from "Green" to "Yellow I (observation category)", and the approval hierarchy for credit extension and loan disbursement was raised accordingly. In June 2026, after receiving a "Resumption Notice" issued by the Construction and Transportation Engineering Quality and Safety Station of Jimei District, Xiamen, confirming that rectification measures had been completed, the Branch conducted another ESG risk reassessment and uploaded the resumption notice to the management system, thereby restoring normal business processing.
- A waste-to-energy company in Chongqing engaged in municipal solid waste incineration power generation. During post-loan monitoring, the Bank identified ESG risk alerts after the client was ordered by environmental authorities to rectify non-compliant storage of fly ash hazardous waste and incomplete emission monitoring records. The Bank immediately suspended credit utilisation, downgraded the ESG risk classification to "Red", and required the company to implement corrective actions. The enterprise completed seepage prevention upgrades in its storage area, improved environmental management records, and upgraded pollution control facilities. Following verification by third-party testing and acceptance by environmental authorities, the Bank reviewed

all compliance documentation, completed an ESG risk reassessment, and resumed loan utilisation.

#### **Case: Due diligence on ESG risk-intensive industries**

- A hardware trading company engaged in the distribution of hazardous chemicals, an ESG risk-intensive industry, was identified by the Bank as having relatively significant ESG compliance risks during ESG risk management processes. Accordingly, the Bank downgraded the client's ESG risk classification to "Red". In line with the policy requirement that "no new business shall be conducted for existing clients, and existing exposures shall be gradually reduced and exited", the Bank implemented a de-risking and exit strategy for the client. At present, all loans to the client have been fully repaid.

### **(IV) ESG Risk Management Integration in Business**

The Bank integrates ESG risk management into the business management system and processes, comprehensively implementing ESG risk control requirements in due diligence, compliance review, credit approval, loan granting review, post-investment and loan management, risk asset disposal, and other processes, aiming to promote the implementation and effective operation of the ESG risk management system.

#### **1. ESG risk management system for investment and financing business**

The Bank has established a sound ESG risk classification management system, which covers 14 dimensions including emission management and workplace safety, 40 key indicators, and 293 risk classification rules. The system automatically identifies and monitors risk events such as enterprise penalties and reprimand notices published on thousands of governmental websites, including those of environmental protection and development & reform authorities, on a daily basis, and integrates internal and external data about judicial litigation, negative public opinions, and lists of dishonest entities.

On a cumulative basis, the system has identified tens of millions of ESG risk items, intelligently analysing the nature and severity of risks to facilitate ESG risk monitoring and classification, and enable pre-event warning and post-event alert.

## **2. An ESG rating tool for corporate customers**

The Bank has launched an automated ESG rating tool for corporate customers, designing 74 data-driven rating indicator systems for enterprises of different industries and scales. The tool is applicable to a wide range of clients, highly targeted, systematic and automated, and combines international standards with practices with Chinese characteristics. The tool makes it easier for users across the Bank to view ESG rating analysis, ESG risk warnings, comparative analysis of similar customers, overall ESG performance in key business areas, and the characteristics of ESG risks in specific regions of selected customers. As of the end of the first quarter of 2026, the tool had enabled automatic ESG rating for 2.02 million customers meeting the evaluation criteria. The ESG rating tool provides important references for customer selection and credit evaluation in the Bank's credit and investment business. Applied to ESG risk classification management, it helps scientifically evaluate clients' sustainable development capabilities, and promotes proactive customer selection and risk control.

## **3. Integration of ESG elements into customer credit ratings**

Based on historical risk data, the Bank analyses the correlation between ESG rating metrics and credit risks, incorporating the ESG rating metrics directly affecting credit risks into customer credit ratings, to make the credit rating results fully reflect clients' varying ESG management levels and risk characteristics. The enterprises with sound ESG management can achieve rating upgrades, while those with relatively poor ESG management or triggering negative ESG events will experience downgrades in credit ratings as appropriate. The credit rating results are widely applied throughout the business process, including customer/product access, credit policies, credit lines, credit authorisation, loan pricing, asset classification, impairment provision, economic capital/regulatory capital measurement, and performance assessment. As of

the end of the first quarter of 2026, relevant credit rating models had covered 137.1 thousand customers and RMB17.09 trillion in credit balance.

#### **4. ESG Selected Stock Investment Index**

The Bank further promotes the integration of ESG investment and financing concepts into the entire business process, and innovatively supports equity-loan linkage business. Based on self-developed ESG rating tools, the Bank has completed the compilation of the ESG Selected Stock Investment Index, and designed a visualised system interface, to highlight sustainable investment opportunities and guide the optimisation of credit and investment structures.

The Bank's ESG Selected Stock Investment Index covers mainstream market benchmark indices such as the CSI 300, CSI 500, and CSI 800. The Bank selects the stocks with top-ranked ESG scores among the constituent stocks of the benchmark indices as samples for the ESG Selected Index, tracks their prices and returns, and evaluates the effectiveness of enterprises' green and low-carbon transition, to support the development of transition finance.

To facilitate query and analysis of the ESG Selected Stock Investment Index by business and management personnel at all levels, the Bank has deployed a visualised display interface in the ESG rating system. The system tracks the return performance of the ESG Selected Stock Investment Index in a systematic and automated manner, and comprehensively displays the index compilation plan, constituent stock composition, rate of return, maximum drawdown, Sharpe Ratio, and return-risk ratio, etc.

#### **5. Business practices**

The Bank actively explores ways to link loan interest rates, credit lines, and loan terms, with borrowers' ESG assessments, greenhouse gas emission reduction, energy efficiency, and other sustainability goals. The move aims to motivate and guide loan borrowers to pursue green and low-carbon transition, promote the orderly and effective connection between green finance and transition finance, and fully activate the important role of financial resources in boosting the green and low-carbon transition of the economy and society on all fronts.

The Bank has initiated research on carbon accounting for investment and financing activities, sorted out the requirements of domestic and international regulators and exchanges, investigated the disclosure practices of advanced peers, and visited corporate clients to understand their carbon emission data management, aiming to explore a carbon accounting methodology and practice approach for investment and financing that reflects the Bank's unique characteristics. The Bank steadily advances carbon accounting for the investment and financing businesses, improves the greenhouse gas accounting methodology for such businesses, prioritises carbon accounting in certain key industries, gradually establishes a carbon emission database for investment and financing clients, optimises the carbon accounting system for investment and financing, enriches the system's automated functions, and continuously improves the quality of carbon accounting data.

**Case: Extending “biodiversity + under-forest economy” loan**

In December 2025, the Bank's Ji'an Branch in Jiangxi successfully extended the city's first “biodiversity + under-forest economy” loan to an under-forest economy industrial base. The loan introduced an eco-performance linkage mechanism, under which the loan interest rate was closely tied to key indicators such as vegetation coverage rate and the index of high-quality tree species, thereby establishing a positive loop between ecological conservation and financial support. Loan proceeds were channelled into critical areas of ecological conservation and industrial development.

**Case: Launching the “transition finance + carbon allowance compliance” dual-linked certification loan**

To encourage enterprises to reduce carbon emissions and achieve green transformation and development, the Bank's Wuhai Branch in Inner Mongolia Autonomous Region issued a RMB200 million “transition finance + carbon allowance compliance” dual-linked certification loan to a steel

enterprise. The loan set two key linked indicators: “carbon emission intensity per unit of product” and “carbon allowance compliance status”, directly linking the interest rate to the achievement of these indicators. If the enterprise met the relevant indicator requirements on schedule, the interest rate would be reduced from the original execution rate, thereby using interest rate incentives to encourage the enterprise to lower carbon emissions and achieve green transformation and development. The Bank introduced a third-party professional institution to track and monitor the relevant indicators during the loan period, ensuring that carbon emission levels are reasonably reduced and carbon allowance compliance is completed as needed. The loan was used to support the enterprise in advancing intelligent and green upgrading and low-carbon transformation in accordance with its carbon reduction target plan. It was estimated that carbon dioxide emissions would be reduced by approximately 1.81 million tonnes, and carbon emission intensity per tonne of steel would be reduced by over 25%, helping the enterprise gradually form and improve a low-carbon circular economy industrial chain.

#### **Case: Implementing carbon intensity-linked innovative loan**

The Bank's Henan Branch issued a technological transformation loan to a steel company, and innovatively introduced a “carbon emission intensity-linked” mechanism, using the enterprise’s “carbon emission intensity per tonne of steel” as a floating adjustment indicator for the loan interest rate. According to the agreement, the company was required to regularly conduct carbon emission reduction performance evaluations, and the interest rate would correspondingly be lowered or raised based on the original loan rate in accordance with the evaluation results. If the company met the emission reduction targets on schedule, it could enjoy a preferential loan interest rate, thereby effectively reducing its financing costs. As of the end of the first quarter of 2026, the Bank's Henan Branch had extended RMB133 million in technical transformation loans to the steel company.

### **Case: Implementing the first “carbon asset + coal power industry transition finance” loan in Xinjiang Autonomous Region**

The Bank’s Changji Branch in Xinjiang successfully extended a RMB100 million “Carbon Assets + Coal-fired Power Sector Transition Finance” loan to an energy and chemical group. The loan is aligned with the People’s Bank of China’s transition finance standards for the coal-fired power industry, and supports the enterprise in enhancing energy efficiency and reducing emissions through measures such as coal-saving and consumption-reduction retrofits, multi-energy complementarity between coal power and renewable energy, and the application of carbon capture, utilisation and storage technologies. These efforts help the enterprise advance energy conservation and emissions reduction, achieve its operational carbon neutrality targets, and benefit from preferential loan pricing. In addition, the Bank provides integrated “financing + advisory” services, assisting the enterprise in developing its transition plan, clarifying short-, medium- and long-term transition objectives, and supporting the green and low-carbon, high-quality development of the economy and industry in Xinjiang.

## **(V) Climate-related Risk and Opportunity**

### **Management**

#### **1. Top-level design for climate-related risk and opportunity management**

The Bank sets out clearly that the Board of Directors is ultimately responsible for the formulation and implementation of the Group’s environmental and climate-related strategies, supervises and evaluates the effectiveness of the implementation of environmental and climate strategies, conducts in-depth studies on the disclosure requirements of climate-related information of the International Sustainability Standards Board (ISSB), Hong Kong Stock Exchange, and Shanghai Stock Exchange, assesses the impact of climate-related risks and opportunities on the overall strategy, capital structure, business layout, and financial performance, consistently optimising the top-

level design of climate-related management and enhancing climate risk resilience and management response capabilities.

The Risk Management Committee of the Board of Directors of the Bank is responsible for overseeing and guiding ESG-related risk management, including climate-related risks and opportunities. The committee regularly listens to reports on environmental and climate-related risks and opportunities, researches the corresponding measures of climate change, promotes the deep integration of ESG elements into the comprehensive risk management system, enhances the stress testing of climate-related risks and offers guidance for refining industry-specific credit policies.

The Environment Group of the Management's ESG Promotion Committee is responsible for promoting the implementation of relevant policies and regulatory requirements, integrating environmental and climate-related risk management into all business aspects, and continuously optimising the asset structure to align with the green transformation of economy and society. The Green Finance Committee is responsible for researching and making decisions on major green finance matters, planning the key directions and measures for the Bank's green finance development, and deploying and guiding climate risk management. Each department of the Head Office is responsible for the execution of the specific mitigation mechanisms and response measures of climate risk and opportunity management according to the division of responsibilities and regulatory requirements, implements the identification, assessment and management of climate-related impacts, risks and opportunities, researches and formulates strategies, promotes the integration of the management of climate-related risks into the comprehensive risk management system, effectively enhancing the implementation of the quality and efficiency of management.

For the Bank's governance of climate-related risks and opportunities, please refer to relevant content of "Progress in ESG Governance" in the Governance Chapter.

## **2. Climate-related risk and opportunity analysis**

The Bank actively identifies the environmental and climate risks from

multiple dimensions, integrates climate change risk factors into the traditional risk analysis framework, thoroughly studies the overall impact of environmental and climate risk factors on business models, operation strategies and financial position, and works out targeted measures to ensure stable and sustainable business development. For details of the Bank's identified major environmental and climate risks, opportunities, and corresponding response measures, please refer to relevant content of "Deepening Green Finance for an Innovative Green Future—Strategy—Climate-related risks and opportunities" in the Bank's *2025 Sustainability Report*<sup>5</sup>.

### **3. Climate risk stress testing progress**

Since 2019, the Bank has explored climate risk stress testing to continuously analyse the impact on relevant industries under stress scenarios, and established a climate risk stress testing system covering transition risks and physical risks, thereby supporting the Bank in strengthening and improving the decision-making management. In 2025, the Bank collaborated with external think tanks to upgrade the climate risk stress testing system in accordance with sustainable development requirements. For key industries with emissions data available under clear standards, such as coalfired power, steel, petrochemicals, cement and papermaking, the Bank adopted a bottom-up approach to quantitatively analysing the resilience of customers to transition risks in these industries using stress scenarios better aligned with national conditions and industry practices. This has enabled the Bank to assess the impacts more reasonably, making the policy and management responses more forward-looking and proactive.

#### **➤ Climate-related risk scenario design**

Aligned with China's "1 + N" policy system and relevant policies under the "30-60" goals of Carbon Peaking and Carbon Neutrality, the Bank has formed a set of indicator systems with quantitative indicators as the mainstay, which better matches the national future low-carbon transition path, providing decision-making reference for managing and addressing climate risks of the

---

<sup>5</sup> *2025 Sustainability Report*: <https://en.ccb.com/eng/attachDir/2026/04/2026040216531649105.pdf>

Bank. Taking into account the alignment requirements of regulator-defined scenarios at home and abroad, the Bank refined the “30-60” policy scenarios, introduced the two common scenarios (1.5°C scenario and 2°C scenario) of the Network for Greening the Financial System (NGFS), and made adjustments according to the goals of Nationally Determined Contributions (NDCs) to create the following scenarios.

### ➤ Testing results

Scenario	Description
<b>1.5°C scenario</b>	The increase in global average temperature is limited to 1.5°C above pre-industrial levels through stringent climate policy and technological innovations, and the carbon 1.5°C scenario price rises steadily.
<b>2°C scenario</b>	There is a greater chance of limiting the increase in global average temperature to 2°C above preindustrial levels by gradually strengthening the climate policy, and the carbon price rises slowly.
<b>“30-60” scenario</b>	A localised scenario designed under China’s Carbon Peaking and Carbon Neutrality policy and “1+N” policy; the carbon price rises slowly.

The base period was the end of 2024, with the testing period from 2025 to 2035. The business data of customers at the base date was collected, and the following assumptions were adopted: (1) enterprises assume the escalating emission costs and have no bargaining power with their upstream and downstream partners; and (2) the emission reductions exceeding the compliance target are tradable in the carbon market to obtain additional income. The stress test assessed changes in the financial position of an enterprise by simulating the impact of stress scenarios on key variables, including production capacity adjustment, price movements, carbon price mechanism and energy consumption constraints. Then the internal rating model was used to assess the probability of customer default and assign credit ratings. At last, the overall impact on the Bank’s operations was assessed.

As shown by the test results, if no steps are taken to actively address climate change, customers from five industries will see their debt service ability weakening to varying degrees under stress scenarios, and the risk of default will increase. However, since the five industries have relatively small shares in total lending, and the hedging costs of carbon emissions trading increase, their overall impact on the asset quality of the Bank has been mitigated, and their impact on the capital adequacy ratio is not significant.

➤ **Climate-related risk assessment and application**

**The Bank strengthens climate-related risk warnings to ensure operational safety of institutions.** Based on the results of climate-related risk stress testing, the Bank identifies the branches more vulnerable to disasters, and sends risk alerts to them, reminding them to pay great attention to climate-related physical risks, closely monitor the early warnings issued by meteorological authorities, and exercise effective safety management of office buildings and business premises, to ensure personnel safety and production stability.

**The Bank deepens climate-related risk assessment of credit portfolios to strictly control credit risks in sensitive industries.** The Bank has conducted climate-related risk assessments on the loan portfolios, focuses on the operations of credit clients in industries vulnerable to climate impacts, such as agriculture, forestry and high-carbon-emission industries, and monitors the impact of climate-related risk factors—such as natural disasters and policy controls—on customers' operations and financial conditions. If any risks that may trigger clients' credit profile arise, the Bank will promptly conduct re-examination of the credit ratings to identify, warn against, expose and dispose of the potential risks at an early stage.

**The Bank strengthens collateral risk management.** The Bank requires that collateral exposed to natural disasters be covered by insurance, and has established mechanisms for collateral value revaluation and dynamic monitoring. On this basis, institutions are required to conduct regular revaluations of collateral and promptly carry out irregular revaluations when risk events occur, such as significant market price fluctuations or contractual default events. In cases where a decline in collateral value results in insufficient coverage of the secured obligations, the Bank requires timely risk mitigation measures, including requesting additional collateral or loan recovery.

**The Bank embeds climate-related risks into business processes to build a closed-loop credit management system.** The Bank continuously deepens the application of the ESG risk management system, embedding climate-related risk assessment into the entire process of ESG due diligence

and credit management for investment and financing businesses. Among the environmental due diligence indicators, specific indicators on “climate change impact and response” are set, covering core dimensions such as carbon emission intensity, energy efficiency level, progress of energy structure transformation, compliance of greenhouse gas and major pollutant emissions, and the potential impact of production and operations on regional ecology and biodiversity. The Bank actively explores climate risk management across the entire chain of pre-investment and loan, during-investment and loan, and post-investment and loan stages. In the pre-loan phase, scenario analysis and risk screening tools are introduced to conduct quantitative assessments of physical risks and transition risks for customers in high-exposure industries; in the approval phase, climate risk factors are incorporated into the internal rating and “four colours and five categories” classification model, with differentiated credit limits, risk pricing, and sustainability-linked clause constraints implemented; in post-loan phase, a dynamic monitoring and early warning mechanism is established, with regular reassessment of collateral climate resilience, and timely initiation of classification review and risk resolution measures for customers with elevated risk levels. The credit approval operating procedures for small and micro enterprises explicitly stipulate that if a significant environmental or climate risk event occurs in an enterprise, a credit review should be initiated promptly. In terms of assessment and evaluation, branches that actively contribute to the first line of defence and achieve approval growth rates in key areas such as green finance higher than the Bank’s median are given additional points. This effectively enhances the effectiveness of climate-related risk management and collaborates with customers to promote low-carbon transformation.

### **III Green Operation**

The Bank strictly complies with the requirements of laws and regulations such as the *Energy Conservation Law of the People's Republic of China* and the *Environmental Protection Law of the People's Republic of China*. In the daily operations, the Bank consistently upholds the concept of green development, continuously promotes the construction of a green operation system across various operational scenarios, and coordinates the advancement practices in green office, green procurement, and green outlet construction. The Bank builds high-standard green data centres, iteratively upgrades green service facilities, regularly carries out low-carbon and environmental protection-themed education and capacity building, and actively explores sustainable operation models featuring intensive resource utilisation and eco-environmental friendliness.

#### **(I) Building a Green and Low-Carbon Bank**

The Bank constantly deepens green and low-carbon transformation, fully integrating the concept of sustainable development into every aspect of management and operations. By promoting green office, advocating green services, implementing green procurement, effectively implementing green and environmental protection requirements, and actively promoting the construction of green outlets and energy-saving renovations of green data centres, the Bank is building a comprehensive green operation system.

The Bank systematically advances carbon inventory of own operations, continuously deepens refined energy management, and improves the waste classification and disposal mechanism to ensure that both hazardous and non-hazardous wastes are properly disposed of. The Bank promotes the digital transformation of business processes, continuously implements paperless operations of counter services, and builds an electronic service system covering the entire business process. The Bank comprehensively promotes green procurement practices, deeply integrates green procurement requirements into the entire supplier management process, and guides the entire Bank in implementing green procurement. The Bank systematically advances the construction of green outlets. As of the end of the first quarter of

2026, a cumulative total of 2,649 green outlets had been completed and opened. The Bank carries out energy-saving renovations of data centres, promotes the reduction of energy consumption levels and the continuous improvement of resource utilisation efficiency in data centres, effectively fulfils environmental protection responsibilities, and sets a benchmark for green development in the industry. For more details on green operation practices, please refer to relevant content of “Deepening Green Finance for an Innovative Green Future—Strategy—Climate-related risks and opportunities” in the Bank’s 2025 *Sustainability Report*.

#### **Case: Launching “dual carbon” pilot projects in office buildings**

The Bank actively responds to the national “Carbon Peaking and Carbon Neutrality” strategic objectives, and formulates the *Work Plan for “Carbon Peaking and Carbon Neutrality” Pilot Projects in Office Buildings*. Adopting the principle of “prioritising self-driven energy conservation and low-carbon operations, supplemented by carbon offsetting”, the Bank advanced implementation through multiple pathways including technological emission reduction, management-led energy conservation, and green electricity usage. On the basis of reducing total carbon emissions and emission intensity, carbon offsetting measures were employed to achieve carbon neutrality in office buildings. In the first phase, 75 office buildings were selected for carbon neutrality pilot projects, all of which achieved carbon neutrality by the end of 2025. In 2026, the pilot scope was further expanded, with an additional 195 office buildings added to the carbon neutrality pilot programme. The Bank would continue to create benchmarks for green operations, accumulate replicable and scalable low-carbon management experience, and steadily promote the green and low-carbon transformation of the Bank’s operations, contributing financial strength to the achievement of the national “Carbon Peaking and Carbon Neutrality” goal.

## **(II) Raising the Awareness of Environmental Protection**

The Bank adopts multiple measures to promote the publicity and training

of green environmental protection concepts, building a comprehensive and multi-level green development culture system. In conjunction with important occasions such as the World Earth Day, the National Energy Efficiency Promotion Week, and the National Low-Carbon Day, the Bank plans and carries out diverse and content-rich energy conservation and carbon reduction publicity activities, continuously enhancing the environmental awareness of employees and the public. It actively organises environmental protection public welfare activities such as voluntary tree planting and waste classification, collaborates with external organisations to create featured environmental protection projects such as the “Caring Station Public Welfare Forest”, fulfilling the green commitments through action. The Bank further advances ESG-themed publicity, publishes special content on carbon footprint management achievements, and effectively enhances the green brand influence. At the same time, the Bank conducts green operation special training for employees of all branches across the Bank, systematically promoting green operation concepts such as waste classification, paperless office, and thrift and frugality, driving green behaviours to be internalised in the mind and externalised in action, and comprehensively creating a strong cultural atmosphere of green and low-carbon. The Bank continuously deepens the promotion and operation of personal carbon account services, innovates employee carbon footprint scenarios, and creates featured low-carbon practice activities such as employee walking activities and “clean plate” check-ins, promoting the integration of low-carbon living and green office concepts into daily life. As of the end of the first quarter of 2026, the scale of personal carbon account users had reached 24.5 million.

### **(III) Steadily Advancing Towards Environmental Goals**

The Bank has always regarded environmental goal management as a core lever for green operations, systematically establishing environmental goals covering key areas such as emission reduction, energy conservation, waste reduction, and water conservation, and continuously promoting the construction of a green operation management system. Closely aligning with the requirements of the “Carbon Peaking and Carbon Neutrality” strategy, the Bank scientifically sets optimisation and advancement strategies for key areas such

as energy conservation, emission reduction, and resource recycling, regularly reviews progress and evaluates implementation effectiveness, and dynamically adjusts and optimises advancement strategies to ensure the steady achievement of all environmental targets, providing solid support for building a green and low-carbon bank. For details on the Bank's environmental goals, please refer to relevant content of “Deepening Green Finance for an Innovative Green Future—Strategy—Indicators and targets” in the Bank's 2025 *Sustainability Report*.

## **CHAPTER THREE SOCIAL**

### **I Human Capital Development**

The Bank regards human capital as the core driving force for promoting high-quality and sustainable development of the enterprise. The Bank consistently adheres to the guidance of the talent development strategy, upholds an equal and diverse employment strategy, continuously optimises talent introduction and allocation mechanisms, and combines job requirements with employee potential to build a comprehensive, scientific, and systematic talent cultivation mechanism, helping employees continuously enhance their professional capabilities and comprehensive qualities. The Bank continuously deepens employee care, provides comprehensive and diverse welfare benefits for all employees, improves democratic management and employee communication and feedback mechanisms, unblocking employee expression channels, fostering an organisational atmosphere of respect, trust, inclusiveness, and collaboration, effectively enhancing employees' sense of belonging and fulfilment, and promoting value co-creation and result sharing between employees and the enterprise through mutual growth.

#### **(I) Equal and Diverse Hiring**

The Bank resolutely follows the national strategic requirement about “giving top priority to employment and promoting high-quality and full employment”, earnestly fulfils the social responsibility as a major state-owned bank, and practises the philosophy of equal and diverse hiring throughout the process of talent recruitment. Upholding the principles of “openness, equality, competition, and merit-based selection” in hiring, the Bank continuously enriches job opportunities in recent years, maintains recruitment programmes on a relatively large scale, provides diversified job opportunities in different regions, institutions, and professional fields for talents with diverse professional backgrounds, and improves the professional structure of employees, laying a talent foundation for the Bank’s business development.

The Bank strictly abides by the *Labour Law of the People’s Republic of China*, the *Labour Contract Law of the People’s Republic of China*, the

*Provisions on Prohibition of Child Labour*, and other relevant laws and regulations, strengthens the building of labour employment rules and systems, adopts the labour contract system for all employees, bans all forms of child labour and forced labour, and safeguards labourers' legitimate rights and interests, to make sure that employees achieve career development in an equal and fair working environment. The Bank firmly safeguards equality in employment, clearly specifies that "no conditions involving employment discrimination should be set" in the *Measures for the Management of Open Recruitment*, and resolutely prohibits employment discrimination based on gender, nationality, region, religion, etc., to safeguard and ensure fair employment.

The Bank continuously optimises the employee recruitment management process, enhances the fine-grained and full-chain management capabilities of recruitment, provides convenience for job seeking and employment, builds a stable and orderly employment environment, and fosters an enabling atmosphere for employment. In 2026, the Bank was honoured with awards such as "China Best Employer of Excellence 2026" "Best Campus Recruitment Case Award 2026", continuously enhancing the Bank's employer brand influence.

The number of employees hired by the Bank by employment type was as follows:

<b>Employment Type</b>	<b>2026.3.31</b>	<b>2025.12.31</b>
Employees (person)	375,960	378,344
Workers dispatched from labour leasing companies (person)	3,209	3,236
Part-time employees (person)	0	0

## **(II) Talent Development Strategy**

### **1. Talent development plan**

The Bank attaches great importance to talent development. Closely focusing on key areas such as enhancing the "Three Capabilities", excelling in

the “Five Priorities” of finance, and integrated comprehensive operations, the Bank implements a series of key talent cultivation projects, with emphasis on building talent teams in key areas including corporate and retail relationship managers, equity investment, investment banking, asset management, wealth management, financial markets, international business, risk measurement, and artificial intelligence. By developing distinctive training programmes centred on the core business and responsibilities, and deepening the classified and tiered training model, the Bank forms a scientific and efficient talent cultivation system, continuously enhancing employees' professional capabilities and comprehensive qualities, thereby providing strong support for building a high-quality and professional talent team and promoting high-quality development.

## **2. Analysis of human capital**

The Bank has established a mechanism for systematic and regular human capital analysis. Guided by strategic objectives and business needs, the Bank continuously conducts personnel structure and efficiency analysis, and formulates scientific human resource allocation strategies, to provide talent support for high-quality development. Human capital analysis is conducted mainly in the following dimensions:

- Total number of employees: The Bank monitors talent reserve dynamically. The Bank evaluates and determines the total number of employees needed from multiple dimensions using the human resource management information system, and based on the Bank's strategic plans, business development, operating budget and other factors.
- Employee structure: The Bank follows up on business development and needs in real time, takes into full account factors such as business volume, working efficiency of employees, etc., conducts effective quantitative evaluation of personnel needed for key positions, improves the employee structure, and empowers scientific allocation decisions. Meanwhile, the Bank applies digital tools to conduct fine analysis based on scenarios, intelligently match expert talents, and strengthen the building of diverse talent pools.

- Employee hiring and screening: The Bank continues to standardise employee recruitment and selection processes. It uses the intelligent recruitment system and the resume screening tool to scientifically analyse the key attributes of candidates, such as educational backgrounds, qualifications and abilities. By doing so, it systematically and intelligently improves the recruitment efficiency and quality, and facilitates the selection of high-quality talents.
- Employee turnover: The Bank regards personnel stability as a solid foundation for sustainable development. Supported by the human resource management information system, the Bank strengthens turnover monitoring and analysis, urges and guides operations at all levels to optimise the turnover management process, and formulates and implements targeted improvement measures, to effectively enhance the stability of the workforce.

### **3. Building of specialised talent teams**

The Bank presses ahead with the building of specialised talent teams, and systematically optimises the talent introduction mechanism. By broadening talent selection channels, improving selection criteria, and establishing professional talent pools, the Bank continuously enhances the breadth and depth of talent introduction.

Based on actual business needs, the Bank follows the strategic requirements of promoting the “Five Priorities” of the financial sector, namely technology finance, green finance, inclusive finance, pension finance, and digital finance, and focuses on implementation of major strategies such as fintech and digital operation. While maintaining strength in traditional talents specialising in economics and management, the Bank highlights the introduction of technical and engineering talents, stepping up recruitment of professionals in fintech, digitalisation and green finance, among other fields. Meanwhile, to strengthen the reserve of tech talents, the Bank has established channels for tech talent recruitment that cover all institutions in campus recruitment, and actively carries out social recruitment of high-level professionals, to introduce top talents in AI, cybersecurity and other fields. The

move optimises the professional structure of employees and establishes a solid foundation of diverse talents for the Bank's stable development in the long run.

The Bank continuously strengthens the reserve of professional talents, formulates and issues the *Management Measures for the Construction of Professional Talent Pool* to standardise the construction work of the professional talent pool across the bank, and continuously optimises the foundation for talent "selection, cultivation, management, and utilisation". The Bank develops a bank-wide online expert talent pool management system and continuously improves the information system for the talent pools. The Bank develops and issues the plans for the construction of relevant talent pools, continuously promoting the development of professional talent pools in the "Five Priorities" of finance, private banking, investment banking, risk measurement, and other areas, and ensures the timely updating of relevant personnel. The Bank continuously expands the construction of the overseas talent pool, enhancing the capacity for cultivating and reserving international talent, and providing a strong talent pipeline guarantee for the global development of the business. In 2025, the Bank organised the selection of candidates for the overseas talent pool across 86 operations including departments in the Head Office and domestic tier-1 branches, added 573 new members into the talent pool, bringing the total size of the overseas talent pool to 2,432, continuously consolidating the international talent reserve. The Bank promotes the enhancement of the capability level of the Group's asset custody business talent team, has organised the selection of candidates for the asset custody talent pool in 2026, with the first batch selecting 97 members. The Bank deeply implements the fintech talent project, strengthening the cultivation of new FinTech talents. As of the end of the first quarter of 2026, the number of new FinTech talents had reached 372.

### **(III) Empowering Employee Growth**

The Bank attaches great importance to employee growth and development, continuously improves the management of employee career development training and systematically enhances the standardisation and refinement of talent cultivation. Centred on the needs of employee growth, the Bank builds a comprehensive and multi-level talent cultivation and development mechanism

and formulates differentiated career development plans tailored to the characteristics of different job sequences and development stages, helping employees consolidate their professional foundations, broaden their career horizons, and stimulate their inner potential. The Bank continuously innovates training models, builds an integrated online and offline employee growth platform, and establishes close cooperation with external universities and other institutions, providing employees with broad space for continuous learning and long-term development, helping employees realise their personal value, and growing together with the enterprise to create a shared future.

### **1. Education and training system construction**

Under the guidance of the talent development strategy, the Bank continuously refines the employee career development training system, completes relevant systems on employee education and training, coordinates the implementation of stratified and classified training plans, actively leverages digital means, enriches training channels and resource supply, and improves training contents and modes, to continuously enhance training quality and learning experience.

#### **1.1 Full-cycle training system for employee career development**

The Bank tightly integrates the strategy advancement with business development, built an enterprise-level learning product system that covers the entire career cycle of employees, covering all stages, from new employees' onboarding and integration, to their growth into core business member, and up to the stages of intermediate and senior professionals and managers. In addition, the Bank has developed a learning map covering all the business segments according to the sequence of professions, forming a four-in-one knowledge system of "teaching materials, question bank, training, examination" through the growth paths of employees' learning, assessment, development and promotion, and make education and training as an important driving force for the building of a learning organisation.

#### **1.2 Education and training management system**

The Bank continuously improves the education and training system. While thoroughly implementing the latest requirements of the CPC Central Committee

on education and training work, the Bank, based on actual conditions, formulates and implements a series of systems such as the *Education and Training Management Measures* and the *Education and Training Plans*. The Bank systematically plans the development direction of the education and training work, ensures that education and training align with business needs, provides institutional safeguard for talent cultivation, and effectively drives the improvement of employees' professional capabilities and career development.

### **1.3 Annual employee training plan**

The Bank attaches great importance to the formulation and implementation of the annual employee training plan, and scientifically formulates the annual education and training plan in close alignment with the Bank's strategic development goals and needs for talent team building. The Bank systematically integrates internal and external high-quality training resources, continuously improves the training supply system, and adopts a stratified and classified training approach based on employees' job characteristics and capacity requirements to achieve full coverage of training. In the first quarter of 2026, various types of training across the Bank covered 347.7 thousand employees, effectively enhancing their professional competence and job capacity.

### **1.4 Digital platform and management system**

The Bank launches the "CCB Research" platform and successfully connects it to the "CICC Research Insights" research report system, provides research report inquiry and learning services to all employees across the Bank, serving as a reference for macro-, meso-, and micro-research, as well as loan research, investment research, and industry research across the Group, thereby providing more solid intellectual support for the Bank's high-quality development. The Bank continuously improves the "CCB Learning" platform, aggregates high-quality internal and external resources, strengthens platform functionality, and consolidates digital learning service support. The Bank continuously enhances AI capabilities, promotes the application of "artificial intelligence+" in the field of training and research, optimises the examination and assessment system, further improving invigilation accuracy and promoting the iterative upgrading of the Bank's digital learning concept.

The Bank actively promotes the digital transformation of training management and strives to optimise the functions of the digital training management system. By establishing an electronic training archive system for employees with “one file for each person”, the Bank can achieve complete collection and dynamic update of training data. Employees can check their personal training hours, learning progress and training records at any time, which improves the convenience and transparency of training management and provides strong technical support for talent training across the Bank.

### **1.5 Education and training resources**

In order to continuously strengthen the supply of education and training resources, the Bank establishes a “three-in-one faculty system” with full-time teachers, part-time teachers and teachers from outside the Bank. As of the end of the first quarter of 2026, the enterprise-level learning product library offered 323 learning projects across six major business areas, and the teaching materials library contained a total of 112 sets comprising 221 volumes of teaching materials in use.

### **2. Job-specific development training programmes**

The Bank continuously improves the training development system covering all employees. Based on the needs for business development and talent team building, each business line defines targeted and effective training strategy to suit the professional qualifications or skill requirements of specific jobs, and implements personalised, rational and feasible career training programmes, ensuring in-deep matching between the training plans and the needs for business and talent development.

To support specific career development training, the Bank actively provides resources guarantees, and strengthens the professionalism and relevance of the trainings. While refining the internal training and teaching system, the Bank introduces excellent external resources to help employees grasp industry trends and increase their knowledge and skills. The Bank deepens cooperation with institutions such as external universities to customise characteristic talent training programmes.

#### **2.1 Specialised technical job level examination**

The Bank has established an internal learning and examination system that covers all employees, making “learning and applying” the primary way for professional talent to advance in their positions. Based on a dual career path of management positions and professional and technical positions, the Bank systematically and comprehensively plans employees’ career development paths, improves the specialised technical position system, continuously optimises job promotion rules, highlights the important value of primary-level practice, and establishes a competitive selection mechanism based on performance and abilities. The Bank continuously improves the hierarchical specialised technical job level exam system that covers all employees, and scientifically and reasonably establishes examination subjects that cover areas such as corporate finance, personal finance, risk management, and financial accounting, encouraging employees to continue to dig into their professional fields and continuously increase their core competence and professional quality. A total of 63 examination subjects have been established across the Bank, basically covering all business lines, with examinees from all 37 branches, Head Office departments, operations of CCB Learning Centre (Research Institute), directly affiliated institutions, audit operations, domestic subsidiaries and overseas operations. A special learning section has been established, collecting and sorting more than 600 sets of learning materials such as examination teaching materials, policy documents, work procedures, and operation manuals, with 11 million attendances in total. As of the end of 2025, the Bank organised live-streamed pre-examination tutoring and training, invited internal and external experts to explain the key points of examinations and share learning and preparation tips, with 370 thousand attendances in total; and organised the specialised technical job level exam, with a cumulative 1.06 million participants passing the relevant exams.

## **2.2 Themed labour contests and excellence initiatives for all employees**

In order to stimulate employee motivation and promote capacity enhancement and growth development, the Bank adheres to the concept of “promoting training through competition” and regularly conducts themed labour and skill competitions targeting all employees. The Bank issues selection and

commendation measures for the CCB Model Worker Awards, May Day Labour Awards, and March 8 Red Flag Bearer Awards, further enhancing the recognition framework and incentivising employees to strive for excellence and innovation. The Bank establishes Model Worker and Craftsman Innovation Studios. In 2025, six studios were designated as “CCB Model Worker and Craftsman Innovation Studios” and construction commenced on 17 studios, so as to transform individual expertise into collective capability and foster a strong culture of innovation and value creation.

### **2.3 Training for personnel at primary-level outlets**

The Bank focuses on improving the service work at primary-level outlets, consolidating the implementation of strategies and service quality improvements of outlets. The Bank continuously optimises the training mechanism for outlet operations directors, outlet client managers and outlet customer service managers, to improve the job adaptability of employees, effectively empowers and reduces their burdens, ensures service quality at outlets, and promotes sustainable and high-quality business development.

Training programme for outlet operations directors. Focusing on the key contents of the routine work of outlet operations directors in business operation management and compliance operation risk control, the Bank systematically designs five module curricula covering management enhancement, risk prevention, service upgrading, competence improvement, and communication and sharing, etc., accurately fostering key capabilities in coordinated management, customer service, compliant operation and risk control, to improve the operation quality and efficiency of outlets. In 2025, 47 Head Office-level on-site training sessions were held, training 3,009 outlet operations directors and related management personnel in total.

Training programme for outlet client managers. The Bank adheres to the concept about digitalisation, specialisation and integration. The Bank deeply integrates the pain points of digital marketing and wealth management of outlet client managers, sets up three types of course modules, including leadership by Party building, business development and improvement of comprehensive literacy, and forms a full-chain learning mode that combines “special online

section for learning, systematic offline training and post-training tracking and tutoring”. Relying on the diverse learning paths, the Bank empowers the service team to standardise and upgrade the professional capabilities, effectively supporting the building of the team of outlet client managers, and contributes to the greater value-creating capacity of outlets. In 2025, 80 Head Office-level on-site training sessions were held, training 4,500 client managers and wealth management personnel in total.

Training programme for outlet customer service managers. Based on the daily work such as customer service, counter operation and outlet operation, the Bank builds a core course system. Using diverse ways like operation manual learning, micro-lecture learning, onsite training, focus livestream and pre-exam tutoring, the Bank improves outlet customer service managers the competence of their positions, risk awareness and professionalism. Meanwhile, the Bank continuously improves the functions of the special online learning section, builds a digital learning ecosystem and comprehensively supports for capacity enhancement needs of outlet customer service managers for exams, certification, improvement of abilities and exchanges. In 2025, a total of 46 Head Office-level on-site training sessions were held, covering 2,651 outlet customer service managers.

## **2.4 Training of international talents**

The Bank continues to promote the concept of international development, helps international and professional talents improve their abilities, builds a learning product system for “enhancing international competitiveness”, and develops systematic and specialised foreign-related business learning products and tools, building an employee workforce with a global vision, professional skills, and international competitiveness. Based on the “CCB Learning” platform, the Bank establishes an “International Channel” section, providing employees dedicated to foreign-related businesses with four categories of course resources, covering corporate foreign exchange policies, international business product service systems, client group service capability enhancement, and international business compliance management; and provides primary-level outlet employees with learning products such as “English service capability enhancement at outlets”, helping them further improve comprehensive

international service capabilities.

## 2.5 Training in collaboration with external institutions

The Bank focuses on enhancing the mechanism for training professional talent, actively integrates internal and external training resources, and enriches talent reserves for various business lines. In doing so, the Bank aims to strengthen employees' expertise, skills and service practice capabilities. Some case examples are as follows:

Talent type	Measures	Training results
Rural revitalisation finance talents	In 2025, in collaboration with Zhongnan University of Economics and Law, Southwestern University of Finance and Economics, and Xi'an Jiaotong University, the "Build a Better Future" special study programme on enhancing county-level competitive capability was developed.	Five "Build a Better Future" training sessions were held in 2025, with more than 240 employees trained, aiming to cultivate outstanding rural revitalisation finance talents and enhance the overall service capacity of rural areas.
International finance talents	In collaboration with Southwestern University of Finance and Economics, the Bank systematically constructed an international business training knowledge module content system covering the macro level, foundational level, and practical level, focusing on strategic directions such as the high-quality development of the national "Belt and Road" initiative, the	In 2025, a total of nine special training sessions on international business were held throughout the year, covering different levels and positions including the management at the Head Office and branches, manager level, professional core talents, frontline business personnel, and personnel in foreign exchange and internal

	<p>integration of domestic and foreign currencies, enterprise overseas expansion, and industrial chain restructuring. Nine course systems were established, and five core courses were developed, covering areas such as the “Belt and Road”, international trade finance, international settlement and trade finance, comprehensive fundamentals of international business, and foreign exchange policy management. A total of 14 high-quality learning programmes and nine core courses have been accumulated. A tiered, classified, and integrated online and offline systematic learning ecosystem has been formed, continuously empowering the Bank’s branches to enhance their capability to participate in international competition.</p>	<p>control compliance positions, with a cumulative total of 549 trainees trained.</p> <p>The Bank plans to organise nine special training sessions in 2026. Through systematic and professional training, the international perspective, professional practical capabilities, and compliance risk management skills of the trainees are effectively enhanced, providing solid talent support for the Bank’s integrated domestic and foreign currency operations and the high-quality development of international business.</p>
Legal talents	<p>The Bank collaborated with Zhongnan University of Economics and Law and leveraged its state-level key disciplines, state-level law experiment and teaching centre and other unique advantages to develop the “Learning Programme for Improving Authorisation</p>	<p>In 2025, one session of the authorisation management capability enhancement training program was held to provide intellectual support for improving the professional competence and capability of the Bank’s legal personnel in</p>

	Management Abilities” and “Training Programme for Foreign-related Legal Professionals”.	authorisation management.  In 2026, one session of the foreign-related legal talent training program was held, further enhancing the ability of foreign-related legal professionals to handle complex and difficult foreign-related legal matters.
Digital finance analytics professionals	In collaboration with the University of Hong Kong, a comprehensive talent development system has been established, focusing on digital operation capabilities. This system integrates theoretical instruction, model construction, practical exercises, research projects, and certification assessment into a full-chain training framework. The programme comprises 11 core courses, which deeply integrate key content such as statistical analysis, data mining, machine learning, and financial scenario applications, emphasising the integration of theory and practice, as well as the combination of technology and business, and creating a standardised, professional, international talent development pathway for data	In 2025, systematic training was delivered to core data analysis personnel across the Bank. The programme comprised a total of 208 training hours, with 70 thematic live-streaming sessions and 7 unified course examinations organised. Meanwhile, through project-based practical training, over 120 modelling workshops were conducted. The average learning hours per participant reached 157.3 hours. A total of 109 trainees successfully passed the comprehensive course assessment and obtained professional qualification certificates accredited by the Hong Kong Council for Accreditation of Academic and Vocational

	<p>professionals. This initiative provides robust capability support for the Bank’s digital operations and data-driven decision-making across all business lines.</p>	<p>Qualifications. In addition, 11 project research reports were produced.</p> <p>In 2026, the fourth phase of the programme is planned to be launched. Integrating the development trends of artificial intelligence technology, the Bank’s approach to building an intelligent data system, and feedback from trainees, the programme plans to deeply promote the integration and implementation of artificial intelligence technology with banking business scenarios, aiming to adhere to the dual-driven development orientation of digital technology and data elements, and to continue cultivating professional data analysis talents.</p>
--	---	--

### **3. Graduate traineeship/internship programmes**

The Bank continuously strengthens the training for young talents with great potential, builds a comprehensive and diverse graduate training mechanism, helps graduates identify career paths, guides students to deeply explore potentials and broaden development horizons, builds a solid groundwork for career development, and develops with the Bank while better understanding the culture and the values.

#### **3.1 “CCB Intern” internship programme**

The Bank continuously carries out the “CCB Intern” summer internship programme, targeting the on-campus students of all universities and majors both at home and abroad. The Bank is committed to building a practical platform for college students to learn about banking operations in depth and experience the workplace. As of the end of the first quarter of 2026, the Bank had provided internship opportunities to more than 80 thousand college students, effectively helping them improve their professional qualities and adaptability. In addition, for students of the IT major, the Bank establishes a fintech-themed summer internship programme to provide opportunities to deeply engage in important projects such as fintech project research, innovative technology exploration, big data analysis and application, and the building and operation of digital platforms within the Bank, helping students improve their understanding of the fintech field. The “CCB Intern Star” selection and the “FinTech superstar” competition are held concurrently to provide campus recruitment policy support to outstanding performers. While enriching students’ internship experience, the Bank also builds a good talent pool for campus recruitment.

### **3.2 “Your Future with CCB” new employee training mechanism**

The Bank fully supports employees in their career development. By forging the “Your Future with CCB” new employee training brand, the Bank optimises and upgrades the training model backed by “onboarding training, integration follow-up cultivation, and new talents training”, the Bank empowers the growth of young employees in all aspects.

New employee training programme. The Bank organises integrated onboarding training for new employees. Relevant department heads from the Head Office are invited to help new employees further understand corporate culture, products and services, and youth leadership building through online teaching within the Bank. The training covers new employees of the Head Office, tier-1 branches, operations directly under or managed by the Head Office, as well as a number of domestic subsidiaries and overseas operations, effectively ensuring the standardisation and consistency of new employee training across the Group.

Young employee integration programme. The Bank implements systematic

training for the young employees at primary-level operations serving the Bank for less than three years, while getting familiar with business developments within the Bank, and helps this group identify career paths. The programme focuses on two key positions, namely outlet client manager and counter teller. Taking into account the ability vulnerabilities and learning preference of the employees in the integration period, the Bank has built a “five-stage training system”, including online training camps, offline demonstration classes, practice tracking and tutoring, mentor empowerment, and post-training solidification, and supported programme implementation at branches, effectively adapting to their positions, and helping them integrate and grow fast.

New talents training programme. The Bank launches the “new talent” training programme for outstanding young employees. With increased efforts in cross-level and cross-field training and greater focus on the continuous training of employees, the programme aims to promote the rise of high-potential talents and help cultivate young talents as reserve cadres. With the IDP (Individual Development Plan) as the core, the programme implements personalised training measures and continuously tracks the process within a period of about 1.5 years, empowering full-chain talent development.

#### **4. Supporting employees in obtaining occupational qualifications and academic degrees**

The Bank continuously improves the training related to employees’ professional abilities and qualifications, implements a comprehensive programme supporting professional qualification certification for all employees (including workers dispatched from labour leasing companies), offers adequate professional resources, and supports employees to improve their personal professionalism, pursue higher academic degrees, deepen study of enriching knowledge and strengthen their competitiveness. Meanwhile, the Bank actively carries out the internal qualification certification system, accurately assessing employees’ professional abilities. Also, the Bank continuously encourages employees to participate in specialised technical job level exam, helps employees to strengthen their professional literacy and skills, realising the common development of people and enterprises.

#### **4.1 Establishing an internal qualification certification system**

The Bank continuously improves the self-developed training system for the certification of wealth management professionals, and, via the “CCB Learning” platform, to set up systematic qualification certification courses and an online learning section, providing resource guarantee for relevant talent certification training. As of the end of the first quarter of 2026, the Bank had cumulatively trained and certified 147.6 thousand “China Construction Bank Financial Planner (CUFP)” professionals. To further enhance the professional literacy and service abilities of outlet customer service managers across the Bank, the Bank launched a qualification certification system for outlet customer service managers, independently developed initial, intermediate, and advanced qualification certification courses for outlet customer service managers, and efficiently organised learning through the online platform. As of the end of the first quarter of 2026, a total of 94.6 thousand employees had obtained qualification certification for outlet customer service managers.

#### **4.2 Supporting employees in obtaining external professional qualification certifications**

The Bank advocates the continuous enhancement of employees’ professional competence and strongly supports all employees in obtaining external professional qualification certifications. For professionals in related fields, such as client managers, wealth consultants, and compliance managers, the Bank provides unified support of examination fees for those who have taken and passed the tests for professional qualification certifications, such as Certified Public Accountant (CPA), Chartered Financial Analyst (CFA), CFA ESG Investing, Financial Risk Manager (FRM), Associate Financial Planner (AFP), Certified Financial Planner (CFP), Certified Tax Adviser (CTA), Corporate Finance Consultant (CFC), Certified Treasury Professional (CTP), Certified Private Banker (CPB), Certified Anti-money Laundering Specialist (CAMS), etc. Under equal conditions, they will be given priority for professional and technical job positions.

Additionally, the Bank collaborates with universities at home and abroad to conduct a number of professional certification training programmes, to help

employees obtain professional qualification certifications, and encourages and supports employees to strengthen their professional knowledge system and enhance their job competence through professional learning platforms. The Bank carries out the “Data Analyst Certification Training Programme” jointly with the University of Hong Kong. As of the end of the first quarter of 2026, a total of 304 trainees had passed all the assessments under the programme, and had received the professional qualification certificates certified by the Hong Kong Council for Accreditation of Academic and Vocational Qualifications.

#### **4.3 Launching academic degree programmes for employees**

The Bank encourages employees to improve their professional literacy and practical abilities in the financial field. Also, the Bank collaborates with colleges and universities and other institutions on academic degree programmes for employees, leveraging their resources to broaden employees’ horizon, deepen their understanding of professional knowledge, and enable them to achieve long-term career development. As of the end of 2025, employees with junior college education or above accounted for 97.26% of the Bank’s total workforce, while those with master’s and doctoral degrees accounted for 15.45%.

The Bank continues to build the Post-doctoral research workstation, and obtained the approval for independent recruitment of Post-doctors in 2022. The Post-doctoral research workstation consistently follows the training concept of “research for application, talent to full potential”, builds a talent incubation system covering the whole chain from “recruitment, cultivation, retention and utilisation”, and forms a positive cycle of “strategic research - translation of results – talent supply”. With the trained talents supplied to Head Office departments, tier-1 branches, key sub-branches, and subsidiaries, the Post-doctoral research workstation has fostered a contingent of interdisciplinary talents with both academic attainments and practical abilities for the Group’s high-quality development. The workstation has recruited and trained nearly 100 Post-doctors in total; over the past three years, 22 Post-doctors joined the workstation, and 27 Post-doctors successfully completed their training and left the workstation.

### **5. Skills and knowledge development training**

The Bank continuously optimises the leadership development mechanism for all employees, enriches the support of leadership training resources, and systematically strengthens the management capabilities of employees. The Bank has implemented succession plans for key positions to ensure the continued stability of the talent team, grow the reserve of management talent at all levels, and ensure the resilience of sustainable development.

### **5.1 Leadership and management capacity training for all employees**

The Bank regards the cultivation of management capabilities and leadership across all employees as a key measure to enhance organisational effectiveness and support the long-term development of employees. By establishing a tiered and categorised systematic empowerment system, the Bank strengthens employees' core competencies in areas such as goal decomposition, cross-departmental collaborative execution, comprehensive risk and compliance management, and adaptation to digital transformation, thereby facilitating a shift from "passive execution" to "active management". Through the early identification and cultivation of high-potential talent, the Bank has consolidated a sustainable talent pipeline foundation, providing solid organisational assurance and intellectual support for the implementation of the Bank's overall strategy and high-quality development. Leveraging the "CCB Learning" platform, the Bank builds a leadership channel, a department-level leadership enhancement channel, and other dedicated channels, offering open and shared online learning resources to all employees. These resources cover areas such as leading self, leading business, and leading teams. Courses include *The Five Practices of Exemplary Leadership*, *Leadership Enhancement for Young Cadres*, *Leadership Cultivation in the VUCA Era*, *Talent Development Acceleration Programme – Secrets of Effective Mentorship*, *The Art of Identifying and Utilising Talent for Leaders*, and the "Good Builder" Leadership Training Enhancement Model Micro-Lecture Series. Online learning has reached over 400 thousand attendances.

### **5.2 Leadership training for front-line management personnel**

The Bank pays great attention to the empowerment of frontline managers

and continuously strengthens leadership training support to help improve the management ability of employees, forming a three-tier advanced leadership training system of “outlet heads, heads of county sub-branches, heads of tier-2 branches”.

Learning programme to boost the abilities of outlet heads. Based on training requirements, the targets of training covered newly appointed outlet heads, part-time lecturers for outlet heads, and reserve talents for outlet heads. Standard course systems have developed for each type of training targets. Diverse training forms, including livestreams, online training camps, offline centralised training, and door-to-door teaching, were available, to better meet the demand of tier-1 branches for the regular training of outlet heads. Meanwhile, the Bank pays attention to the personalised needs of branches, applies a variety of learning techniques such as experience extraction, manual development, performance improvement, action learning, etc., customises the design of consulting projects, forms a specialised training model for outlet heads, and creates a model for outlet head training projects. In 2025, a total of 71 Head Office-level on-site training sessions were conducted, training 3,376 outlet heads and reserve talents.

Learning programme to boost the abilities of heads of county sub-branches. Heads of county sub-branches play an important leading role in the business development of county-level institutions. The Bank continues to carry out the comprehensive competency enhancement learning programme for heads of county sub-branches, which is based on the competency model of heads of county subbranches and aims to enhance the group’s competency in five areas: Party building, strategy promotion, business operation, team leadership and risk control. The programme follows the characteristics of adult learning spiral, comprehensively using learning forms such as experience extraction, benchmarking field studies and on-site lectures by experts, with performance improvement as the goal, and designing a closed learning loop of “Learning-Thinking-Practising Enlightenment” with the end as the beginning to help the development of county business and the enhancement of the capacity of heads of county sub-branches.

Learning programme to boost the abilities of heads of tier-2 branches. The

heads of tier-2 branches are the core force driving the Bank's strategy implementation and sustainable business development. Through the case teaching mode of combining training and combat, the program invites the Bank's heads of tier-2 branches who have outstanding performance in operation and management, innovation and change to share and exchange their practices, and analyse operational strategies based on real cases. In addition, the program focuses on inspiring participants' thinking, organising them to carry out knowledge extraction and case writing, linking leadership knowledge points with scenarios and cases, combining business practice with theoretical knowledge, and promoting the internalisation of knowledge into competence by means of leading cadres on the podium, subject research and action learning workshops.

### **5.3 Key position succession system**

The Bank continuously optimises the overall planning and systematic layout of talents, enhances the construction of the senior management team at all levels of operations, and fully explores, cultivates and selects outstanding young talents, so as to inject vigorous strength for long-term stable development. The Bank actively optimises the career development path of employees, builds a clear job position system, and formulates and implements succession plans for management personnel. The Bank implemented talent training programmes for heads of primary institutions, heads of secondary branches, heads of county-level institutions, and heads of outlets. For the young employee group, the Bank has systematically improved the whole chain mechanism for the selection, training and management of management personnel, and clarified the target ratio of young management personnel to be permanently equipped at the management level. The Bank has continuously carried out diversified management work centred on succession systems for key positions.

#### **Policy and system construction**

The Bank attaches great importance to the construction of the key position succession mechanism and formulates policies and systems such as the *Implementation Plan for the Cultivation of Outstanding Young and Middle-aged*

*Cadres and the Management Measures for Specialised Talent Pool Building.* These policies and systems specify the criteria for the selection standards, training plans, file management, and assessment of successors, standardise the succession process and successor management, and further consolidate the foundation for the Bank's work related to "selection, cultivation, management, and utilisation". Meanwhile, the Bank keeps track of changes in laws and regulations, regulatory policies, and relevant internal rules and regulations, and promptly reviews and updates related policies based on actual needs. The focus of system review and update lies in meeting internal and external compliance requirements and ensuring implementation effects. The update processes cover steps such as collecting internal and external requirements, drafting and revising contents, soliciting opinions from stakeholders, and review and approval, etc. After being revised and going through the Bank's internal deliberation and decision-making procedures, the systems will be released and implemented across the Bank.

### **Implementing the supporting mechanism**

The Bank focuses on the training of succession candidates for key positions, implements management succession plans, standardises and optimises the succession management process, and strengthens the talent guarantee for the Bank's sustainable development and stable operations. The Bank's Management takes part in and guides the succession work for key positions and supervises its effectiveness. The HR Department of the Head Office is responsible for execution, and heads of business departments take charge of successor management in a coordinated manner.

The Bank regularly analyses team composition and personnel demands, and identifies the mobility risk associated with the employees in key positions. For the key positions exposed to high mobility risk, the Bank summarises the professional skills required by specific positions based on the characteristics of such positions, defines selection criteria, works out detailed successor training plans, and searches potential successors suitable for the positions. Furthermore, the Bank implements a rigorous and fair selection mechanism to select the promising and competent successor candidates for the succession cultivation plan. Also, successor files and a successor assessment mechanism

are established to regularly assess the candidates' performance and abilities. The results will be used as a major basis for appointment to ensure the successors most suitable for the positions are selected.

The Bank reviews the successors annually, with a focus on their performance, assessment results, comments and the proficiency of their skills needed for the positions, and tracks to review them continuously. These efforts ensure the successors for key positions are competent for the positions and the succession process is fair, just and effective.

## **6. Carrying out joint talent cultivation programmes partner with educational institutions**

The Bank continuously strengthens the partnership with educational institutions, including the first-class universities like Zhongnan University of Economics and Law, Southwestern University of Finance and Economics, Xi'an Jiaotong University and The University of Hong Kong, forming a joint cultivation mechanism with the Bank's characteristics, which provides employees with extensive learning and exchange opportunities while cultivating financial talents with excellent talent and professionalism, and realising the high-quality development of the professional talent echelon.

The Bank develops and implements joint cultivation programmes together with prestigious universities at home and abroad, with the aim to foster and improve the professional capacity and comprehensive quality of the talents in key positions. In cooperation with Xi'an Jiaotong University, the Bank launched a two-year minor training programme called the "CCB Financial Technology Elite Class" to cultivate interdisciplinary talents with insight into emerging and cutting-edge technologies and a solid foundation in the financial discipline. The programme enrolls undergraduate, master's and doctoral students majoring in science and engineering at Xi'an Jiaotong University each year. Upon completion of the programme, students may obtain a bachelor's degree with a minor in economics and relevant academic certificates. As of the end of the first quarter of 2026, a total of 115 students had completed the programme.

### **(IV) Non-pay Benefits**

The Bank upholds the value orientation of "people-oriented" and places

high importance on the protection of employees' rights and interests. The Bank establishes a non-pay benefits system covering all employees (including workers dispatched from labour leasing companies), effectively implements employee care initiatives and provides diversified non-pay benefits guarantees. By fostering a positive atmosphere of equality, respect, solidarity, and mutual care, the Bank comprehensively stimulates employees' intrinsic motivation, achieving a mutually reinforcing dynamic between enhanced employee well-being and the Bank's high-quality development.

### **1. Safeguarding rest and leave rights**

The Bank attaches great importance to and effectively protects the rest and leave rights of all employees (including workers dispatched from labour leasing companies). The Bank provides paid annual leave, home leave, marriage leave, funeral leave, maternity leave, breastfeeding leave, sick leave, work-related injury leave, personal leave, special leave for public duties and some other types of leaves, seeks opinions and suggestions from employees, constantly improves relevant benefits, and timely updates and improves rules and regulations on extended maternity leave, paternity leave, parental leave, nursing leave, etc., in accordance with local policies and regulations, establishing a harmonious and warm corporate atmosphere.

### **2. Providing employees with insurance and supplementary medical insurance**

In effective accordance with state policies, the Bank makes full contributions to basic endowment insurance, basic medical insurance, unemployment insurance, work-related injury insurance and maternity insurance, as well as the housing provident fund. The Bank also establishes an enterprise annuity plan and a supplementary medical insurance plan for all employees, with the latter mainly including commercial group medical insurance. In addition, the Bank additionally provides employees with a platform for group purchase of cost-effective health insurance products, and contacts social security organisations to provide maternity allowance application services for female employees, forming an all-round and multi-disciplinary medical protection system.

### **3. Caring for employees' physical and mental health**

Employees' physical and mental health is an important guarantee for achieving sustainable development. The Bank always implements health care for employees in their work and life, urges employees to have health check-ups regularly to identify potential health problems in time. The Bank provides health check-up benefits for all employees every year. The Bank pays consistent attention to employees' mental health, actively provides employees with mental health services, and organises a variety of activities to relieve their mental stress, such as giving mental health lectures, offering hotline services, and building a talent team dedicated to promoting mental health. In 2025, the Bank provided employees with 76 thousand mental health consultations and humanistic care services in other forms.

### **4. Caring for female employees**

The Bank attaches great importance to caring for female employees, comprehensively advancing the implementation of relevant initiatives in dimensions such as system support, cultural facilities, and practical assistance. The Bank actively facilitates the implementation of the collective contracts for the protection of female employees' rights and interests, conducts equal consultations on key concerns such as salary distribution, rest and leaves, education and training, career development, protection during "menstruation, pregnancy, perinatal and lactation periods", and other benefits, achieving the synchronous advance of work related to the consultation, signing and performance across the Bank. The Bank organises a series of activities to celebrate International Women's Day ("March 8"), organises the reading and writing activity themed "Rose Fragrance and Joyful Reading", continuously invests funds to build "Care Rooms for Female Employees" with primary-level operations across the Bank, creating a cultural brand for female employees and enriching the services for female employees. In addition, the Bank actively guides the labour unions of primary-level operations to establish a mechanism supporting female employees in difficulty, focusing on strengthening care and support for groups such as the female employees who raise children as single parents.

## **5. Refining the employee mutual aid system**

The Bank continues to improve the employee mutual aid system, fully responds to the “mutual aid mechanism”, “one heart plan” and other policies, focuses on addressing employees’ urgent and special needs, and drives the effective implementation and tangible results of various aid measures. The Bank actively carries out special aid programmes. In 2025, the Bank allocated RMB500 thousand to support the Xizang Branch and Hainan Branch in disaster relief endeavours.

The Bank is dedicated to creating a unique and warm-hearted labour union brand, continuously promotes the construction of “staff homes” and “staff family units”, always putting staff at the core and focusing on addressing their most pressing concerns, which include enhancing staff rest areas, fitness facilities, and stress-reduction provisions, as well as developing activity rooms and reading corners. The Bank significantly enhances the employees’ sense of gain and happiness by improving their working and living environment.

## **6. Normalised caring activities on festivals**

The Bank persists in launching normalised caring activities on festivals, focuses on “care and support” initiative for employees in difficulties, front-line employees, and employees in special posts during key holidays including the New Year’s Day and the Spring Festival, and gives particular attention to visiting and consoling employees or their families who live in difficulties because of critical illness, work-related injuries or death, and disasters. Meanwhile, the Bank increases visits to the officials dispatched to other areas for training, poverty alleviation or exchanges, as well as the officials and employees, model workers and skilled talents at primary-level operations, in old revolutionary base areas, areas with concentrations of ethnic minorities, border areas, and poverty-stricken areas, and those who still work during festivals, ensuring the caring activities cover all employee groups. During the New Year’s Day and Spring Festival holiday period of 2026, the Bank raised funds and materials worth over RMB46.98 million, visited 9,316 operations and outlets, and extended care to employees in difficulty and dispatched officials through 123.8 visits.. The Bank also provided employees in difficulty with living and medical

assistance, effectively implementing caring measures and enhancing employees' sense of belonging.

### **7. Diverse cultural and sports activities**

The Bank actively supports employees to develop their interests and hobbies after work, and carries out diverse cultural and sports activities regularly, enriching employees' life after work. Combining with employees' interests and feedback, the labour unions of various levels across the Bank organise a variety of personalised cultural, sports, reading and writing, publicity and display, and public welfare activities, to boost teams' vitality. In 2025, the labour union of the Head Office organised cultural and sports activities for employees, including "Low-carbon Living – Good Builder Walks" Autumn Employee Walking Event, showcasing employees' vigour and building the momentum for the Bank's development. The "Outlet Employee Week" was held as ever across the Bank, continuously enhancing the sense of happiness among employees at primary-level operations.

### **(V) Strengthening Democratic Management**

The Bank is committed to safeguarding the legitimate rights and interests of employees, and continuously deepens and improves the democratic communication mechanisms. The Bank actively implements the "openly soliciting suggestions" initiative, launches the "openly soliciting suggestions system" across the Bank, establishing a direct dialogue mechanism between the Head Office and primary level operations, as well as a closed-loop management process of "collection – handling – feedback – evaluation", to listen to the voices of primary level operations and enhance the Bank's governance effectiveness. Focusing on the entire performance appraisal process, the Bank builds a two-way interactive performance communication mechanism, encouraging employees to deeply engage, participate broadly, and continuously improve. The Bank broadens channels for feedback, encourages employees to actively offer suggestions, adheres to the principle of information confidentiality, effectively strengthening the protection of privacy. Regular satisfaction surveys covering all employees are conducted to extensively listen to employees' opinions and suggestions. The survey results are thoroughly

studied and analysed, and then translated into reference support for management improvement, fostering a cultural ecosystem of openness, transparency, equality, mutual trust, inclusiveness, and openness.

### **1. Regular performance appraisals and feedback**

The Bank has established a performance management system that covers all employees, and continuously improves the regulations and policies about performance management, enhances requirements on assessment methods, processes and results feedback, and unifies the orientation for performance assessment. Employee performance evaluation methods mainly include ongoing assessment, annual assessment, special assessment, and term-based assessment. The evaluation covers all employees, and the performance management process consists of performance planning, performance implementation and coaching, performance appraisal and feedback, and the application of appraisal results and improvement. After going through democratic procedures, including soliciting opinions and suggestions from employees and holding employee representatives' meetings or general staff meetings, operations of various levels formulate assessment methods and release them to all employees, to make sure employees fully understand assessment contents and relevant requirements, and ensure that the performance assessment is fair, open and transparent.

The performance assessment process mainly consists of the following four steps:

- (1) Formulation of performance plans. Based on full communication and consultation, immediate superiors and subordinate employees reach agreement on performance objectives and personal development plans, and then develop performance objective assignments. This step further includes the decomposition of institutions' objectives, assignments of objectives by immediate superiors or authorised assessment departments, drafting of initial proposals by employees, conversations about performance plans and confirmation by immediate superiors. Performance objectives are generally assessed through the combination of quantitative

indicators and qualitative investigations, and the combination of key tasks and daily performance.

- (2) Performance implementation and tutoring. In each cycle of performance management, based on actual work, immediate superiors have conversations with employees on performance objectives, tutoring and feedback, so as to raise employees' awareness of performance objectives, strengthen guidance of and supervision over employees in daily work, and accomplish performance objectives together. Performance implementation and tutoring come in forms like performance conversation, written tutoring, skills training and experience sharing, covering content of highlighting employees' strengths, summarising improvement areas, guiding employees to enhance performance and supporting them in meeting performance objectives.
- (3) Performance assessment and feedback. Under the principle of "whoever manages, evaluates", the contents of assessments include fulfilment of assignments and quarterly objectives, performance of duty and attendance, morality and professional ability, work attitude, integrity and self-discipline, etc. Meanwhile, the Bank establishes employee assessment work records, and sorts out and files relevant materials as a reference basis for understanding employees' daily performance and evaluating annual assessment results. The process of delivering assessment results includes self-assessment, assessment by immediate superiors or other authorised assessors, rating by performance assessment meetings, and providing results feedback and improvement measures. After employees learn about assessment results, their feedback on the assessment results can be obtained by means like conversations, meetings or solicitation of their written opinions.
- (4) Application and improvement of assessment results. Annual assessment results of employees are a major reference for promotion, salary increase, position adjustment, and education, training and cultivation. Also, the Bank provides employees with suggestions for better performance based on their assessment results, communicates with

employees about improvement plans, continuously follows up on their progress, and actively helps them address problems they encounter and give feedback on.

## **2. Employee remuneration structure**

The Bank strictly complies with national laws, regulations and regulatory requirements, and has established a scientific, standardised and transparent remuneration management system. The Bank is committed to attracting and retaining outstanding talent through market-oriented mechanisms, and deeply integrates performance evaluation results into the full-process management of human resources. The remuneration of the Bank's employees (including non-sales and non-management employees) consists of base salary, performance-based pay and benefits. Base salary reflects the safeguarding function and is relatively fixed, mainly determined by the value of the position and the employee's performance. Performance-based pay reflects the incentive function and is relatively variable, mainly determined by the assessment results of the Group, the employee's institution and the individual, and is linked to factors such as performance, risk, internal control and capability. Benefits include statutory social insurance, housing provident fund, enterprise annuity, supplementary medical insurance, etc.

Adhering to the philosophy of standardising distribution order and building harmonious distribution relationships, the Bank continuously improves the level of performance and remuneration management to support the high-quality development of the Bank. The Bank's remuneration distribution fully leverages the incentive and constraint functions, establishes an assessment and distribution concept that encourages value creation, and insists on tilting remuneration resources towards business operations, front-office departments and positions that directly create value. At the same time, the Bank strictly implements the incentive and guarantee system for grassroots employees, strengthens income protection for employees of primary level operations, and effectively enhances employees' sense of gain. The Bank strengthens the remuneration management of overseas operations and controlled subsidiaries, optimises the income distribution structure, improves the incentive and guarantee system, and further promotes the improvement of the Group's

management level and work efficiency.

### **3. Reporting of employees' opinions and grievance**

The Bank places great emphasis on listening to employees' voices, deeply implements the “openly soliciting suggestions” initiative, smooths the channels for opinion appeals and issue reporting, ensuring the timely, fair and effective processing of employees' concerns. The Bank has established a diversified opinion feedback system and channels, including the employee representatives' meeting and the voice of employees (VOX), to ensure effective reach to employees at all levels. Through various platforms such as the official website, internal notices, email and internal communication tools, the Bank extensively promotes the channels for opinion communication, feedback and reporting, actively encouraging employees to speak freely and offer suggestions.

Employees are allowed to submit opinions anonymously and strict regulations are in place to govern the authorisation and access to employees' personal information and feedback. The Bank strictly adheres to information confidentiality requirements throughout the feedback handling process and strictly controls data retention time to ensure the security of employees' personal information. The Bank pays great attention to employee feedback regarding labour rights and development opportunities, including opinions and suggestions on career development, labour relations, remuneration and benefits, labour safety, rest and leave, skill training, etc. The Bank supports employees in expressing their opinions and suggestions via email, internal communication tools, employees' communities, mailbox, etc. The departments responsible for the feedback channels, such as labour unions and human resources departments, periodically handle and reflect employees' opinions and suggestions, ensuring the continuous flow of communication. These efforts ensure employees' feedback to be effectively implemented and responded to.

**Employee representatives' meeting:** The Bank has established a corporate democratic management system with the employee representatives' meeting as its basic form. The Bank continuously deepens the multi-tiered system of employee representatives' meetings within the Group, covering all tier-2 branches and sub-branches and above. By carrying out diverse activities

like “implementation of the proposal solicitation and handling system” and “employee representatives visiting primary-level operations”, the Bank constantly expands and enriches the channels for democratic participation, and motivates employees across the Bank to deeply engage in the Bank’s decision-making, management and supervision process through employee representatives’ meetings and other forms of democratic management. The Bank promotes the revision of the *Measures for the Corporate Democratic Management* and establishes the employee director system, aiming to enhance employee representatives’ abilities to perform duties and build harmonious labour relations characterised by shared advancement, mutual benefits and win-win outcomes between employees and enterprises. Meanwhile, the Bank always regards labour unions as bridges linking the Party and employees, continuously improves the election mechanism of the labour union member representatives’ meeting and labour unions, establishes a smooth mechanism for members to express their intentions, and improves their engagement in and satisfaction with labour union affairs, promoting the democratic, standardised and law-based development of labour unions. The Bank held the second meeting of the sixth employees’ representative meeting in December 2025 and held the second meeting of the fourth members’ representative meeting of the China Construction Bank in May 2026. All agendas were completed efficiently and satisfactorily.

**Voice of experience (VOX):** The Bank innovatively develops the voice of experience (VOX) community and continues to put it into operation, forming a convenient channel for employees to participate in the Bank’s management from the bottom up and effectively obtaining employees’ feedback. All outlet employees are encouraged to express themselves anonymously or with real names in the “VOX community”. The opinions presented are analysed, sorted and supplemented by the back-office support team. The Bank fully respects the privacy of employees, and the information of employees who choose to use their real names is visible only within the community. This information will not be disclosed outside the community without the consent of the employees themselves, ensuring the security of employees’ personal information.

The Bank strictly implements the closed-loop management mechanism of

“collect-sort-solve-track-feedback” of the “VOX community”, ensuring the reflected problems are effectively addressed. After the opinions are analysed and categorised, different types of problems will be forwarded to relevant departments for in-depth analysis, and the progress in addressing these problems is continuously tracked and supervised. After experience-related problems are solved, results will be provided to employees in time. When necessary, further comments from employees will be sought. Additionally, in order to improve the efficiency of problem resolution, a cross-department green channel has been in place, ensuring quick response and coordination of information among various departments to jointly address the problems encountered by employees. Through the “VOX community”, the Bank effectively enhances employees’ working experience and boosts their satisfaction and sense of belonging. As of the end of the first quarter of 2026, the Bank had collected and organised a total of 6,763 employee experience feedback items through the “VOX community” since June 2020. Over 97% of employee feedback had been resolved or is being addressed, and the initiative was widely recognised by employees.

#### **4. Employee satisfaction survey**

The Bank implements an employee satisfaction survey mechanism, making it an important way to listen to employees’ voices and optimise management decisions. The Bank conducts employee satisfaction surveys annually across the Bank to gain in-depth understanding of the practical problems which employees face in their work and suggestions for improvements in their work areas. The scope of the survey covers all employees across the Bank, involving topics of career development, training and cultivation, remuneration and benefits, strategic identity, corporate culture, working environment and other issues related to employees, so as to comprehensively understand the true feelings and career experience of employees.

The 2025 employee satisfaction survey showed a high level of overall employee satisfaction, with satisfaction rates exceeding 90% in areas such as training, corporate culture and work support. In response to common issues identified through the survey feedback, the Bank established a closed-loop

management mechanism of “feedback–analysis–improvement–tracking”. Priority has been given to optimising policies related to FinTech talent development and employee rest and leave arrangements. Measures such as supporting the career development of grassroots employees and prioritising remuneration for frontline employees have been continuously implemented. The Bank has strengthened efforts to build a closed-loop management system that addresses, identifies and resolves issues, thereby continuously enhancing employees’ sense of fulfilment, well-being and security, and consolidating talent strength for the Bank’s high-quality development.

In addition, based on opinions and suggestions gathered from primary level operations research, the Bank has studied and formulated the *Key Points of the Primary-Level Outlet Employee Caring Project in 2026*, proposing 21 care measures covering career development, welfare and benefits, physical and mental care, rights protection, and burden reduction and empowerment, to continuously deepen care for employees at primary-level outlets.

## II Protecting Consumer Rights

The Bank adheres to the value concept of “putting people at the heart” and strictly observes regulatory requirements. In line with the requirements of business development strategies, the Bank works to form a new landscape for comprehensive consumer protection.

The Bank has established an integrated consumer protection management system across the Group, and continuously improves a management model characterised by clearly defined responsibilities and coordinated efforts among all parties. By embedding consumer protection and customer service concepts into all business lines and processes, the Bank promotes the transformation of consumer protection work from resolving problems to creating value, and from traditional approaches to digital and intelligent practices, striving to build a benchmark financial consumer protection system that is “domestically leading and world-class”.

### (I) Trainings on the Protection of Consumers’ Financial Rights and Interests

#### 1. Institutional requirements

The Bank actively organises comprehensive trainings on consumer protection to strengthen all employees’ awareness and abilities in the area of consumer protection responsibilities and ensure the orderly development of consumer protection. The Bank developed the *Management Measures for Education and Publicity on Consumer Rights Protection*. The policy standardises the forms, contents and duties of employee training on consumer protection as well as matters worth attention. It requires all levels of operations to organise specialised training on consumer protection within respective jurisdiction at least once a year and the annual training organised by the Party committee central group to conduct at least two sessions on consumer protection, and suggests proper increases of training frequencies for the business positions prone to financial consumer complaints and higher risks. The Bank formulated the *2026 Work Plan for Financial Consumer Education*, which sets out consumer protection training plans for all Head Office departments and provides comprehensive coverage across all business lines.

## **2. Trainees**

The Bank strictly requires all employees related to client at all levels of operations across the Bank to annually join consumer protection training, which covers all middle and senior management staff, business personnel at primary level operations, employees dedicated to consumer protection and newly recruited employees, fully ensuring that they can understand and effectively practise the concept about consumer protection in practical business process. For outbound call related personnel across the Bank, annual training on consumer protection is organised under themes like policy interpretation, risk control, compliant outbound communications, and practical skills enhancement, to continuously improve their awareness of consumer protection responsibilities and professional literacy, and protect consumer rights.

## **3. Training methods and contents**

The Bank has established a variety of training programmes on consumer protection, combining online and offline approaches, for all employees, including special training on consumer protection, training embedded in business lines, daily trainings at outlets, online training via internal platforms, and Party committee central groups learning. The contents of training mainly include national laws, regulations and the Bank's policies about consumer protection, as well as the developments of consumer protection and operation & management approaches. Such training covers various aspects including complaint management, consumer protection review, consumer protection education and publicity, consumer protection assessment, client information security, regulation of marketing and publicity activities, appropriateness management, information disclosure, traceability of sales behaviours and debt collection. In addition, the Bank actively utilises digital approaches to conduct consumer protection trainings, build the online course system on consumer protection, carries out the "Colourful Consumer Protection, Intelligent Classroom" for six consecutive years through the "CCB Learning" platform, publicises courses on consumer protection knowledge and excellent cases of branches, and forms the standardised and distinguished characteristic consumer protection course system. As of the end of June 2026, the Bank had released a total of more than 770 courses that recorded a total of over 14.30

million visits. “Colourful Consumer Protection, Intelligent Classroom” themed course-making campaign has been accredited by the Department of Adult Education, Ministry of Education as a certified curriculum system.

#### **4. System support**

The Bank continuously optimises and refines the features of consumer protection training system. The Bank requires the Head Office departments, tier-1 branches and tier-2 branches (sub-branches) to organise special consumer protection training, “embedded” training for business lines and Party committee central group training through a combination of online or offline methods, and enter training information in the system providing and organise to count training times and participants and establish a good consumer protection training data statistics mechanism, urging relevant work to be advanced in an orderly manner.

#### **5. Work progress**

In 2025, all levels of the Bank organised 22.2 thousand consumer protection-related training sessions, with a total of 2.131 million attendances. Among them, the Personal Finance Department, Private Banking Department, Credit Card Centre and other consumer protection-related departments at the Head Office level worked together to promote and conduct 315 special training sessions, covering 89 thousand attendances; at the tier-1 branch level and below, 37 branches actively implemented and organised a total of 21.9 thousand training sessions, covering 2.042 million attendances. In the first half of 2026, the Bank continued to carry out consumer protection training for all client-related employees, and advanced diversified consumer protection training and capacity-building work according to staff positions and business lines. As of the end of June 2026, institutions at all levels of the Bank had organised over 4,300 consumer protection-related training sessions, with a cumulative total of 259.2 thousand participants.

### **(II) Product and Service Review**

The Bank continues to improve the governance framework for product and service reviews. The Board and the Management effectively fulfil their oversight responsibilities for product and service reviews, coordinating the formulation of

relevant policies and procedures and overseeing their implementation. The Bank further advances product risk assessment and review processes, strictly implements compliance review procedures prior to product launch, and strengthens quality, safety and control measures throughout the entire product lifecycle to ensure the rigor and compliance of products and services and effectively safeguard consumers' legitimate rights and interests.

### **1. The Board and its special committees**

The Bank's Board reviews the strategies for product and service innovation as well as the risk management policies adapted to them, and supervises and reviews the execution of relevant strategies and policies. The Board's Related Party Transaction, Social Responsibility and Consumer Protection Committee supervises and guides consumer protection work related to product and service review, and pays consistent attention to matters related to consumer rights protection. The Board's Risk Management Committee supervises and guides the work related product and service innovation review and risk control, and regularly listens to reports on innovation management.

In the first half of 2026, the Board's Related Party Transaction, Social Responsibility and Consumer Protection Committee actively performed the duty in overseeing product and service review. The Committee reviewed the *Proposal on the Report on Consumer Rights Protection Work in 2025 and the Work Plan in 2026*, listened to and discussed the *Report on the 2025 Consumer Rights Protection Audit*, the *Report on the 2025 Internal Assessment of Consumer Rights Protection and Recent Complaint Cases*, and other reports. The Committee also reviewed written references of the *Report on the 2025 Consumer Rights Protection Regulatory Assessment and Complaint Notification Issued by the National Financial Regulatory Administration in respect of CCB*, and required continued improvement of the consumer protection mechanism and drove the implementation of consumer protection requirements across business processes. The Board's Risk Management Committee listened to and discussed the *2025 Innovation Management Report*, reviewed the Bank's innovation activities and related risk control measures in 2025, provided guidance on strengthening the identification and management of emerging risks, improving the product lifecycle management mechanism,

and tightening the requirements for risk assessment and review of innovative products.

## **2. The Management**

The Bank attaches great importance to the protection of consumer rights and interests, regards consumer protection review as a key measure for the full process control of consumer rights and interest protection, and continuously strengthens the digital empowerment and professional capacity building of the review work. At the same time, the Bank promotes the deeper integration between consumer protection review and operations, thereby avoiding harm to consumers' legitimate rights at the source.

To effectively safeguard consumer rights and interests, the Bank implements full-process and multi-dimensional review and control over all customer-facing products and services across the Bank. All products and services are required to undergo comprehensive and rigorous consumer protection reviews to identify and rectify potential risks in product design and service processes and prevent hidden risks that may harm consumer rights and interests. The scope of review covers all stages of the product life cycle, including product and service design and development, product and service design and development, pricing management, agreement formulation, marketing and promotion, admission of third-party distributors, and admission of distributed products. Focusing on issues of concern to consumers and regulators, the Bank continuously strengthens consumer protection review in areas such as personal information protection, suitability management, product risk disclosure, the authenticity of marketing and promotional materials, and the fairness of contractual terms, ensuring that consumer rights protection is embedded throughout business processes. The Bank has established a digital and intelligent platform for consumer protection review, launched AI-powered consumer protection review functions, which are continuously upgraded and optimised. By leveraging artificial intelligence technologies, the platform intelligently identifies and analyses consumer protection review materials and generates preliminary review results, further enhancing the digitalisation of consumer protection review. As of the end of June 2026, the Bank had completed 243.3 thousand consumer protection reviews, representing a year-

on-year increase of 12.43%.

Additionally, to effectively mitigate potential risks associated with new products, the Bank has established a sound product launch approval mechanism to conduct risk evaluation and review of new products prior to their launch. Meanwhile, relevant departments, including risk control, compliance, consumer protection and legal affairs, participate in the review, responsible for confirming whether the products meet the requirements for launch. New products that fail to pass the required review shall not be launched, ensuring that all launched products comply with industry regulatory requirements and the Bank's internal policies and standards.

### **(III) Loan Contracts Modification**

The Bank strictly implements consumer protection requirements in credit contract signing and related business processes, and strengthens the review of customers' financial qualifications and repayment capabilities. In response to customers' actual financing needs, the Bank provides flexible adjustment solutions for contractual terms and establishes a regular communication mechanism to deliver targeted support. The Bank offers customers reasonable and appropriate adjustments to loan contract terms, and fully considers and helps address customers' practical difficulties on a compliant basis, and dynamically adjusts customers' credit limits, and provides more convenient and efficient loan products and services.

#### **1. Management mechanism**

The Bank formulated the *Loan Contracts Modification Policy Overview*, specifying in detail the applicable conditions, options and notification channels for loan contract modification. The Bank's Consumer Protection Committee is responsible for supervising work related to loan contract modification and reviewing the execution of relevant policies. The Head Office is responsible for establishing a complete loan modification management system, and formulating and improving relevant policies and systems. Branches are responsible for concrete execution and operation. The audit department regularly conducts audit of consumer rights protection, which covers matters related to the implementation of loan modification.

## **2. Applicable conditions**

During the process of clients' performance of contracts, the Bank pays great attention to the changes of clients' financial status, and identifies and analyses clients' repayment abilities in a timely manner. Due to severe disasters or accidents, serious health problems, poor operations, unemployment, serious financial difficulties and extreme bad weather, the Bank allows clients who have difficulty repaying to be provided with special support in combination with loan modification options, subject to mutual agreement. The Bank comprehensively evaluates factors such as client identity compliance, credit performance, income stability and guarantee status, and provides differentiated support plans, including adjustment of repayment plans, extension of loan terms, change of repayment methods, and increase of credit limits, based on the client's actual repayment ability, while ensuring that clients maintain good willingness to repay and have continuous sources of income, to ensure that clients are helped to solve difficulties under the premise of controllable risks.

## **3. Loan modification options**

The Bank upholds the social responsibility of a large state-owned bank. Combined with the communication with clients during the debt collection process and the comprehensive consideration of clients' financial status, the Bank provides corresponding relief support as appropriate for the clients who wish to repay loans but have temporary difficulty in the turnover of funds. For the clients who demand advance repayment, the Bank provides facilitation plans on repayment terms or changes in amounts of instalment repayment, etc., where appropriate. After reaching agreement with the Bank through consultations, clients are allowed to apply for modification of loan terms, instalment amounts, repayment modes, guarantee and accounts authorised to make payment, among others. The Bank also dynamically adjusts clients' credit lines based on their credit ratings. Specifically,

- To meet loan clients' demand for advance repayment, the Bank can lower monthly instalments with the remaining repayment term unchanged, or shorten the remaining repayment term with monthly instalments unchanged;

- To support loan clients' demand for deferred repayment, the Bank allows some loan clients with declining income or temporary liquidity problems to repay in instalments;
- For the clients with good credit, the Bank offers credit escalation options like raising their credit lines or allowing the increase of collaterals or guarantees;
- For the clients with poor credit or declining repayment abilities, the Bank takes moves like stop raising credit lines, lowering credit lines, or account control.

#### **4. Access to information about rights and interests**

For the loan products or services involving loan modification options, the Bank clearly presents relevant modification terms in loan contracts, informing clients of relevant rights and interests. Clients who apply for loan contract changes can learn about relevant matters through announcements at lenders' outlets, websites, etc. For personal consumer loans, clients can also learn about their rights and interests related to loan changes through the entire process of service scenarios, including pre-collection, collection, consultation, and mobile banking repayment.

#### **5. Application channels**

The Bank has established a multi-channel loan modification system to provide clients with a convenient and efficient business handling experience. In terms of service channels, clients can apply for loan modification via offline outlets, mobile banking, and online banking to fully meet the service needs and preferences of different client groups. In terms of service mechanism, the Bank has established a quick response mechanism to efficiently respond to clients' change needs, provide professional consulting answers, and effectively protect client rights and interests. In terms of business processes, for eligible clients, the system supports a service model that combines online automatic approval with offline manual review. Clients can either handle it through mobile banking by themselves, which will be automatically approved by the system, or choose to handle it through offline channels. After the account manager and the head of the operation investigate and review the loan, it will be reviewed by the

handling bank, the head of the second-level branch or the reviewer of the personal loan centre to ensure the standardisation and rigor of the business handling process.

## **6. Review mechanism**

The Bank continuously conducts consumer protection audit on an annual basis and reports the audit results to the Related Party Transaction, Social Responsibility and Consumer Protection Committee of the Board in a timely manner. The audit covers loan contract modifications, focusing on whether consumers are fully informed and have easy access to the services, and whether there are hurdles to consumer services, such as insufficient notification, artificial barriers and increased transaction costs, in business scenarios like loan contract modification. Audit opinions are issued and management optimisation recommendations are put forward to effectively safeguard consumers' legitimate rights and interests.

## **(IV) Debt Collection Management**

The Bank has established a comprehensive and standardised debt collection management system, strictly complied with national laws and regulations such as the *Guidelines for Credit Card Debt Collection of the China Banking Association (Trial)*, formulated and publicised the *Debt Collection Policy Overview*<sup>6</sup>, improved and issued special management regulations such as the *Operational Procedures for the Management of Personal Non-performing Loans*, the *Operational Procedures for Outsourced Collection of Personal Non-Performing Loans*, and the *Operational Procedures for Judicial Collection of Retail and Inclusive Finance Non-performing Loans*, covering the entire process of business scenarios such as conventional collection, outsourced collection, and judicial collection. The Bank also includes debt collection work in the annual consumer protection audit focus, continuously strengthens supervision and review, and achieves effective disposal and standardised management of non-performing loans on the premise of

---

<sup>6</sup> *Debt Collection Policy Overview*: [https://en.ccb.com/eng/2023-08/01/article\\_2023080117461677979.shtml](https://en.ccb.com/eng/2023-08/01/article_2023080117461677979.shtml)

protecting the legitimate rights and interests of consumers.

### **1. Applicable scope**

The debt collection policy of the Bank is applicable to all employees of the Bank and subsidiaries, covering retail loan services and products including operation loan, housing loans, consumer loans and credit card loans, etc. The policy consists of management measures, management rules and operation specifications, and specifies the working mechanism for debt collection that covers collection methods, frequency and requirements. The policy clearly defines fulfilment of the duty to protect consumer rights during the debt collection process, requires regular organisation of training on debt collection, and strictly implements collection procedures.

### **2. Division of duties**

The Related Party Transaction, Social Responsibility and Consumer Protection Committee of the Board of Directors is responsible for overseeing and reviewing the implementation situation of the debt collection policy. The Head Office improves the debt collection management system, reviews and optimises the policy and system for debt collection, develops debt collection plans, and organises training, supervision and inspection, to ensure the effective implementation of the policy. Branches are responsible for the execution and operation of debt collection in specific businesses. The Bank's audit of consumer rights protection covers the audit of debt collection. The audit department inspects the implementation of the debt collection policy as well as the protection of consumers' legitimate rights and interests.

### **3. Working mechanism**

Debt collection methods: The Bank's debt collection methods include manual collection and non-manual collection. Manual collection methods include sending overdue reminders via telephone, face-to-face collection and collection through judicial authorities. Non-manual collection methods include sending overdue reminders via intelligent voice, SMS, correspondence, emails and other internal channels of the Bank (e.g., outlet counters, STM, ATM, mobile banking, online banking). The Bank also outsources collection business depending on actual conditions.

Collection stage: The collection stage is divided into Head Office collection and branch collection. Before the loan is due, the Head Office remote banking centre reminds the borrower to repay the loan through SMS, intelligent robots, and 95533 manual seats, and the branches then collect the money through telephone collection, door-to-door collection, letter collection, and judicial collection, according to the actual transfer situation.

Repayment reminder: Taking the “AI + human” approach, the Remote Intelligent Banking Centre of the Bank provides considerate and differentiated repayment reminder services to clients with loans approaching maturity, matured or overdue. The Bank mainly provides differentiated repayment reminder services to the clients of personal loans, credit cards, small and micro business loans and Yunong Loans.

#### **4. Measures for protecting client rights and interests**

The Bank requires all collection personnel to strictly observe national laws, regulations and regulatory requirements, follow the Bank’s standardised operation procedures for debt collection, and faithfully implement the rules about the protection of consumer rights and interests. During debt collection, the collection personnel are required to, in accordance with regulatory requirements, reasonably arrange collection reminding time, and communicate with consumers in a fair, polite and clear manner. The Bank continuously improves collection strategies based on market environment and client demands, dynamically updates the proportion of credit card debt collection robot and manual collection, refines and details the identification of client groups, ensures efficient debt collection, and implements in a targeted manner with a human touch. The Bank continuously strengthens supervision, assessment and management of debt collection, and firmly forbids violent debt collection of any form.

- **Applying the concept of consultation on the basis of equality.** The Bank promises to reduce the use of obscure jargon, provides clients with practicable solutions after fully evaluating their actual conditions, and shows great care to clients during the process.

- **Providing repayment reminders in a standardised and orderly manner.** The Bank does not initiate any collection with a third-party irrelevant to the debt, or falsely use the name of an administrative or judicial authority or use wording involving threat, intimidation or fraud. The Bank avoids calling clients from 21:00 to 8:00 the next day or disclosing clients' account information to any third-party contacts so as to ensure high-quality client experience.
- **Strengthening intelligence application.** The Bank enriches intelligent service functions and makes the best effort to contact clients so as to reduce clients' cost of forgetting repayment.
- **Refining the compliant collection process.** Based on fair, polite and clear communication, the Bank provides collection reminders in compliance with laws and regulations, reasonably arranges collection reminding time, clearly requires relevant personnel to conduct collection by lawful means, and strengthens relevant supervision, evaluation, training and management.
- **Respecting client privacy.** The Bank processes clients' personal information in line with the principles of legality, legitimacy, necessity, and integrity. The Bank minimises the collection and retention of personal information to achieve the processing purpose, and strictly prohibits disclosing clients' information.
- **Enhancing the management of outsourced collection.** The Bank improves the outsourced collection system, emphasises clear working requirements and operating specifications for outsourced collection, and strengthens the supervision over and assessment of outsourced collection agencies. The Bank urges strict compliance with requirements on protection of consumer rights and interests and personal information protection, and further standardises the management of the outsourced debt collection process.

## **5. Collection review mechanism**

**Supervision and review by the Board of Directors.** The Related Party

Transaction, Social Responsibility and Consumer Protection Committee of the Board of Directors oversees the execution of debt collection policies, and regularly listens to relevant reports by the Management. The Audit Department of the Bank conducts consumer protection audit every year. The audit covers debt collection-related work, with the focus on the improper collection acts of collection agencies and the access and exit management of third-party partners, etc. Also, the Audit Department reviews the implementation of the debt collection policy, and reports the audit results to the Related Party Transaction, Social Responsibility and Consumer Protection Committee of the Board of Directors.

**Management of outsourced collection agencies.** The Bank has established a strict and standardised management mechanism for outsourced collection agencies, formed clear policy system to ensure that debt collection is regulated, standardised, and compliant with the Bank's requirements on consumer rights protection. The Bank sets out strict access and exit criteria to carry out strict screening of collection partners and ensure they comply with industrial standards and legal requirements. In the outsourced collection of overdue and non-performing personal loans, the Bank carries out the whole process through the system, implements the outsourced agency assessment mechanism and the management of post-collection assessment, to ensure standardised operation of the outsourced collection of overdue and non-performing loans. The Bank regularly conducts inspection of outsourced collection work, with the focus on collection wording and code of conduct.

**Improvement of the collection system.** The Bank continues to strengthen the use of system control over the outsourced collection system, guides branches in daily supervision and publicity to strengthen the application of the system, conducts outsourced collection business in combination with the system, and forbids any offline initiation of the outsourced collection process. The Bank keeps improving the features related to the outsourced collection of overdue and non-performing personal loans, refines the charging rate maintenance and reconciliation features for the outsourced collection of personal loans, and improves the efficiency of machine control over information throughout the collection process. The Bank advances the building of systems

related to the data transmission technology for the cloud platform of outsourced collection, boosting the efficiency of debt collection and information transmission while ensuring compliance. At the same time, each relevant department has set up a part-time consumer protection specialist who is specifically responsible for the consumer protection review of all types of interview materials.

## **6. Debt collection training**

The Bank strives to enhance the professional abilities and consumer protection awareness of the personnel dedicated to debt collection in various business lines, and requires all collection personnel, including post-loan management personnel, client managers and the repayment reminding personnel at the Remote Intelligent Banking Centre, to participate in training regularly. The training covers contents like the debt collection policy, system application, complaint management, experience in pilot projects and classic cases, and is organised at least once a year to ensure that the employees are familiar with relevant laws and regulations and internal policies. By regularly holding pre-shift meetings and conducting special training and case sharing, the Bank provides pre-job training and on-the-job training for repayment reminding employees. Also, the Bank organises bank-wide training sessions for the improvement of retail NPL collection abilities every year, and requires tier-1 branches to regularly provide training and retraining to employees within respective jurisdictions so as to ensure relevant policies and processes are properly interpreted and enhance employees' awareness of compliant collection.

In the first half of 2026, the Bank achieved the following results in debt collection training:

The Bank organised a training programme on enhancing the management capability of repayment reminder services at the Remote Intelligent Banking Centre. Senior experts from relevant Head Office business departments delivered specialised sessions on the full-process management of overdue non-performing and non-performing credit assets, as well as the latest policies and market developments, further enhancing the professional capabilities of the

Centre in repayment reminder services.

The Bank provides training on personal and inclusive loan collection, covering the interpretation of the collection policy, system application, and consumer rights protection, which actively helped employees enhance their abilities in the post-lending management of personal and inclusive loans.

The Bank held training on outsourced collection of credit card loans, highlighting the importance of compliant collection through policy interpretation and case study, which strengthened the collection personnel's professional abilities and compliance awareness, fully protected client rights and avoided improper collection behaviours, and ensured compliant and efficient outsourced collection business operations.

The Bank regularly carried out training on non-performing retail and inclusive loans, and provided special training on the key points and practical operations of the outsourced collection of non-performing personal loans for employees in the preservation line across the Bank, to ensure branches faithfully implement policy requirements during the collection process and collect debts in compliance with laws and regulations when collaborating with outsourced agencies.

## **(V) Fair Marketing Policy**

The Bank earnestly implements fair marketing policy in strict accordance with laws and regulations such as the *Advertisement Law of the People's Republic of China* and regulatory requirements including the *Notice on Further Regulating Financial Marketing and Publicity Behaviours*. The Bank fully incorporates consumer rights protection into the whole process of marketing activity design. Based on the relevant policies and practices about fair marketing, the Bank has formulated the *Personal Customer Marketing Policy Overview*<sup>7</sup> and disclosed it through open and official channels to ensure the quality and efficiency of client marketing management across the Bank, ensure marketing to be carried out in a regulated, systematic and professional manner,

---

<sup>7</sup> *Personal Customer Marketing Policy Overview*: [https://en.ccb.com/eng/2023-08/01/article\\_2023080117422440796.shtml](https://en.ccb.com/eng/2023-08/01/article_2023080117422440796.shtml)

and effectively implement various measures devised to protect consumer rights. The Bank regularly organises compliance training on marketing and publicity for branches, strictly standardising the conduct of frontline employees in marketing and promotional activities and process monitoring, and strengthening risk prevention and control throughout the marketing and publicity process.

### **1. Applicable scope**

The *Personal Customer Marketing Policy Overview* is applicable to all employees, departments and domestic branches relating to marketing, and subsidiaries are required to use it as reference. In the policy, personal customer marketing includes marketing planning and advertisement design, financial marketing and business promotion, event organisation and application execution, private domain connection and traffic operation, business opportunity coordination and client reach, contact interaction and experience feedback, network fission and digital communication, process supervision and monitoring & tracking, performance evaluation and validation & conclusion, etc.

### **2. Policy requirements**

The *Personal Customer Marketing Policy Overview* sets out provisions on marketing tools, marketing publicity, marketing execution, and review and supervision, etc. Specifically, it requires complying with the basic specifications for individual client marketing, not violating the basic provisions on marketing, not carrying out misleading publicity, not harming client rights to know, not collecting or using user client information in violation of regulations, not publishing marketing information in violation of regulations, and not violating other mandatory regulations stipulated by laws, regulations or financial regulatory authorities, or involving in cases recognised as not compliant with laws or regulations. Also, the policy further clarifies regulations regarding review and monitoring, employee behaviour management, and execution and supervision during marketing process, to raise employees' awareness of compliance and risks, and forms regulated and professional marketing campaigns. Please refer to the full text published by the Bank for details.

### **3. Practical measures**

Adhering to the client-centric philosophy, the Bank continuously improves client experience, safeguards consumers' rights and interests, and actively implements fair marketing:

- The Bank strictly protects clients' tranquillity rights. The Bank fully aligns with and protects client' rest time and personal willingness, not making outbound calls from 21:00 to 8:30 the next day, only reaching clients with authorisation, and setting call barring for clients who do not accept outbound call marketing.
- The Bank has established the rights middle office, built a rights centre, constantly optimised the rights operation mechanism, achieved the diverse supply of rights categories, strengthened the full life cycle management of rights products and enhanced client journey experience, effectively improving the stability and sustainability of rights.
- The Bank has integrated the capabilities of client system marketing platform, managed bank-wide marketing opportunities and campaigns through enterprise-level system, improving the quality and efficiency of marketing services.
- The Bank has enhanced the coordinating capability of online marketing campaigns, migrated marketing activities to in-house marketing systems, achieving end-to-end in-house marketing data closure and forming routine monitoring and penetrating management of marketing campaigns.

#### **4. Training on fair marketing**

The Bank organises special training on fair marketing every year, to continuously deepen employees' understanding of fair marketing and raise marketing personnel's professional literacy. Such training comes in diverse forms, including training for specific business lines, daily training at outlets, and online training through the CCB Learning Centre, etc. Contents of training cover fair marketing-related laws and regulations, policies, code of conduct, compliance risk and case study. The Bank requires every employee in direct contact with clients to attend fair marketing-related training at least once a year, ensuring that all the relevant personnel can deeply understand and faithfully

practice the principle about fair marketing. Also, the Bank regularly organises exams about the contents of training, to consolidate and deepen the results of training.

## **5. Management and oversight mechanism**

The Bank continues to consolidate the comprehensive management and oversight structure for fair marketing that comprises the Board, the Management and execution levels. The Bank strengthens management of employees as system users, establishes and implements the job responsibility system, and strictly follows the review and approval process before pushing marketing information to clients, to ensure every service is marketed in compliance with laws and regulations.

The Related Party Transaction, Social Responsibility and Consumer Protection Committee of the Board oversees the implementation of consumer protection work including fair marketing. The Consumer Protection Committee of the Management supervises and guides marketing moves by relevant departments, to ensure marketing campaigns are fair and compliant with laws and regulations.

The product and service management department of the Bank conducts comprehensive review of advertisement, marketing and promotions, including marketing plans, common Q&As, event pages and publicity materials, etc. It supervises the implementation of consumer protection review opinions, guards against the risk of infringement upon consumer rights, and pays attention to consumer feedback. Also, it puts in place a whole-process control mechanism for consumer protection, focuses on client demands, and helps clients identify their financial needs and make corresponding decisions.

The audit department of the Bank conducts internal consumer protection audit every year, and reports the audit results to the Related Party Transaction, Social Responsibility and Consumer Protection Committee of the Board. The audit scope covers the implementation of the fair marketing policy, with the focus on whether the evaluated risk levels of the wealth management products the Bank sells as an agent are accurate, whether the disclosed information about where the funds raised through the products are invested is complete

and comprehensive, and whether a service is provided to a client who is misled or not well informed. Based on the audit results, management recommendations on future work will be provided, to ensure the fair marketing policy is strictly implemented and false advertising is resolutely avoided in marketing campaigns, thereby protecting consumers' legitimate rights and interests.

## **6. Management of cooperative institutions**

The Bank pays attention to strengthening the supervision and management of consumer rights protection by cooperative institutions, strictly implements the *Opinions on Further Strengthening Supervision and Management of Consumer Rights Protection by Cooperative Institutions*, and forms a list-based management mechanism for consumer protection. For the items of cooperation involving consumer rights, the Bank sets and strictly follows access and exit criteria for cooperative institutions, and assesses the cooperative institutions in terms of consumer protection every year. In the cooperation agreements, the Bank specifies the responsibilities and obligations of both sides on consumer protection, including but not limited to control of information security, management of service prices, service continuity, information disclosure, financial marketing and publicity, dispute settlement mechanism, assumption of default responsibilities, and emergency response, to reduce external risks from transmitting to the Bank.

## **(VI) Client Complaint Management**

The Bank continuously strengthens the development of customer complaint management mechanism. The Board's Related Party Transaction, Social Responsibility and Consumer Protection Committee effectively performs supervisory responsibilities over customer complaint management, establishing a complaint management system with clear responsibilities and accountabilities, and regularly receives reports on complaints referred by regulators. Focusing on issues reflected in complaints and actual business operations, the Bank dynamically improves complaint handling processes and working mechanisms, and establishes a normalised review and supervision mechanism with full-process closed-loop management, ensuring that the

complaint management mechanism is compliant, transparent and efficient, and effectively safeguarding the timely and proper response to consumer concerns.

## **1. Management structure**

### **1.1 Board of Directors and special committees**

The Bank's Board of Directors is responsible for supervising and reviewing client complaint management. The Related Party Transaction, Social Responsibility and Consumer Protection Committee of the Board fully performs the supervision duties of client complaint management, listens to the complaint notification transferred by regulators, and reviews the assessment of consumer rights protection by regulators on an annual basis, conducts in-depth analysis of the trend of complaint volume changes and causes, provides guidance on improving the quality and efficiency of complaint handling, and comprehensively supervises the complaint management work by the Management and the consumer protection departments to ensure timeliness and effectiveness. In the first half of 2026, the Board of Directors continued to strengthen strategic guidance on consumer protection work, regularly reviewed issues related to consumer protection, and studied and paid attention to key issues such as the construction of the consumer protection system, the bank's complaint data and governance results in key areas, the progress of the annual consumer protection work plan, and the rectification and implementation of regulatory evaluation issues, to ensure that the strategic goals and policy requirements of consumer protection were effectively implemented. The Board's Related Party Transaction, Social Responsibility and Consumer Protection Committee fully played a coordinating role. In the first half of 2026, the committee reviewed reports on consumer protection audits and internal assessments, and regularly reported to the Board on the implementation, supervisory effectiveness and evaluation results of consumer protection work.

### **1.2 The Management**

The Consumer Protection Committee of the Management of the Bank is responsible for making unified planning and overall arrangements for consumer protection work as well as implementing and promoting the work. It organises meetings periodically for the discussion and analysis of complaints in key areas

across the Bank, grasps the trend of complaints dynamically and guides the departments to improve products and services based on complaint information. It regularly reports relevant situations to the Board and special committees, so as to continuously improve customer service. The Chairman of the Board of Directors and the Bank's executives attach great importance to complaint management, lay down special arrangements for reducing consumer complaints, promote and follow up on the effects in a systematic way, and ensure that complaints are resolved timely and effectively. In the first half of 2026, through plenary meetings of the committee or thematic meetings, the committee reviewed the progress of consumer protection, complaints and other matters, analysed the current situation of consumer protection, and mapped out and advanced key tasks in consumer protection.

### **1.3 Consumer protection departments at Head Office and tier-1 branches**

The Bank relies on the establishment of a group-wide integrated consumer protection management system and combines an all-encompassing matrix consumer protection management model to establish consumer protection departments and full-time positions at the Head Office and branches, and equips all levels and business lines with consumer protection professionals to deal with client complaints. The Consumer Rights Protection Department of the Head Office takes the lead in organising and implementing management, guidance and evaluation of consumer complaint handling work, coordinates and supervises operations to properly handle consumer complaints, and provides standardised guidance on the consumer complaint handling process and management. Tier-1 branches undertake the primary responsibility for consumer complaint management and fully implement the consumer complaint management requirements and criteria specified by regulators and the Head Office, ensuring that the rights and interests of consumers are effectively protected. The Bank sets up a consumer protection expert pool and builds a professional and dedicated team of consumer protection experts across the Bank to jointly study and resolve difficult complaints through expert consultation. The Bank strengthens incentives for recognising advanced collectives and individuals in consumer protection, and enhances employees' initiative and

engagement in implementing consumer protection work in a thorough and effective manner.

## **2. Complaint management targets**

The Bank always adheres to a client-first service concept, actively communicates and interacts with clients, and builds and maintains well-functioning communication mechanisms and smooth channels to ensure efficient response and proper resolution of client feedback. The Bank continues to optimise and improve complaint management procedures, strengthens client service experience and provides warm, considerate, efficient and high-quality financial services for clients. The Bank sets specific targets for consumer protection and complaint management, including conducting consumer protection review and inspection of 100% of products and services, reducing the number of complaints per 10 million personal customers, improving the standardisation of complaint handling, and enhancing customer satisfaction. The Bank focuses on strengthening the effectiveness and efficiency of complaint management and actively promotes diversified approaches to resolving disputes.

## **3. Complaint management working mechanism**

### **3.1 Strengthening the system**

The Bank keeps strengthening the complaint management system and built a systematic and multi-level system framework. Through the formulation of system documents such as the *Consumer Complaint Management Measures*, the *Individual Client Issue Resolution Management Measures*, the *Emergency Management Measures for Major Consumer Protection Events* and the *Emergency Plan for Major Consumer Protection Events*, a “1+4+N” complaint management system is formed with the complaint management measures as the core, and supported by the settlement measures, guidelines for the diversified resolution of disputes, consumer protection major events emergency management measures, and consumer protection major events emergency plans. The system standardises the work process in various situations such as routine complaint handling, major complaint response, settlement negotiation, and multi-dimensional dispute resolution, and provides

clear operational guidelines for operations at all levels. At the same time, for key areas where complaints are concentrated, the Bank organises and carries out the management of the source of complaint, effectively improves the service quality in key business areas, and ensures that complaint management work is carried out in a standardised and orderly manner.

### **3.2 Pushing for implementation of responsibilities**

The Bank continues to implement primary responsibilities for complaint handling, strictly implements the “top leader responsibility system” for consumer protection management, and requires the head of corresponding operation to personally investigate, advance and participate in the resolution of major complaints. The Bank enhances the support and guarantee for complaint handling in lower-level operations and promotes all branches to strengthen the management of tier-2 branches and sub-branches. The Bank ensures that the responsibilities on complaint handling channels are fully fulfilled and strictly implements the guaranteed satisfactory solution system to ensure that client demands are responded to immediately. Meanwhile, the Bank equips professional complaint handling personnel in every business line, requiring quick and efficient resolution of client problems. The Bank includes the quality and efficiency of complaint handling of operations at all levels in the scope of assessment, and regularly conducts special inspections on the complaint handling and management of branches through on-site support and data sharing to ensure that client demands are responded to in a timely manner, properly handled and effectively supervised.

### **3.3 Improving monitoring and early warning**

The Bank continues to improve the risk information sharing and joint assessment mechanism, establishes frontend monitoring in key business areas and regions, and effectively applies consumer protection management into all aspects of bank-wide operation management and business development. The Bank monitors the number of complaints, continuously improves the consumer protection management system, and iteratively upgrades the real-time warning of complaints and other functions in the consumer protection management system, so as to achieve early detection, early warning and early disposal of

relevant issues, and strive to effectively reduce the complaints in advance.

### **3.4 Improving the response mechanism**

The Bank has established a “tiered response” problem solving mechanism and comprehensively reviewed and analysed the client problem handling process according to the “funnel principle” to achieve timely and effective resolution of complaints. The Bank implements rapid processing mechanisms for urgent issues raised by clients, where the client service staff cooperate with relevant operations quickly for rapid processing and the processing results will be supervised. The Bank has implemented a diverse dispute resolution mechanism and supports the organisations at all levels to actively participate in dispute resolution. When it is difficult to reach an agreement with clients, it makes full use of third-party mediation to facilitate problem solving, and strengthens multi-party collaboration to effectively resolve clients’ problems from multiple dimensions.

### **3.5 Promoting technology empowerment through innovation**

In combination with big data and AI technology, the Bank promotes the complaint management system, makes full application of analytical tools such as smart complaint early warning and big data analysis. With professional data analysis and full-aspect display, the Bank effectively improves management and monitoring efficiency and makes consumer protection management data “traceable, early-warning-capable, and empowering”. Meanwhile, the Bank improves and promotes the complaint labelling system and classification standards. The Bank categorises complaints based on multiple dimensions, so as to transform unstructured complaint information into statistical and analysable structured data, and accurately locate product and service problems. Through refined classification of complaint data, the Bank effectively supports the monitoring system in consumer protection dashboard, intelligent complaint early warning, and normal big data analysis.

### **3.6 Attaching importance to addressing the root causes of complaints**

The Bank is committed to applying complaint information to the improvement of products and services, through real-time monitoring, periodic

notification and comprehensive analysis of key products, key institutions and key issues. The Bank organises relevant Head Office departments and branches to implement targeted root-cause tracing and optimisation, and coordinates across relevant business lines to jointly identify the root causes of complaints, draw lessons from others and resolve complaint issues at the source. The Bank has also established a normalised closed-loop feedback mechanism in which complaint data is fed back to product design and channel operation departments, urging relevant departments to focus on applying complaint feedback to improve products and services. In the first half of 2026, the Bank established and improved a root-cause monitoring system, strengthened multi-dimensional indicator monitoring, continuously enhanced the analysis and application of complaint data, and promoted the optimisation and upgrading of products and services.

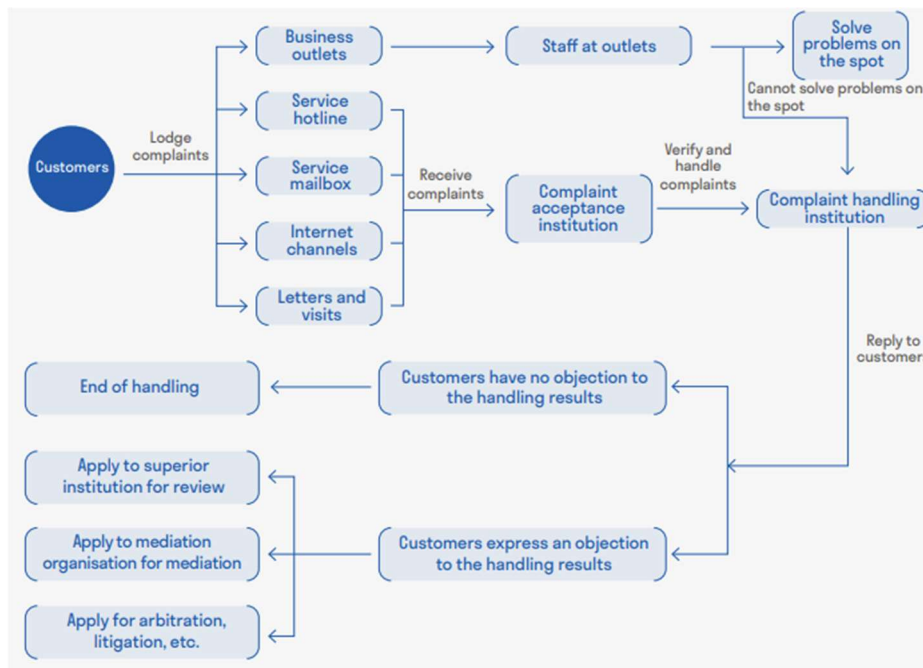
#### **4. Complaint handling process**

The Bank continuously improves the complaint handling process, unclogs client complaint channels and handling procedures, updates public information through online and offline complaint channels, improves complaint handling quality and efficiency, and ensures transparent and accurate information processing. The Bank fully implements consumer complaint handling and review mechanism, carries out various measures including reporting to superior operations level by level, classification-based transferring and complaint supervision, and provides diverse dispute resolution channels to ensure that every complaint is properly addressed and no issue is left unsolved.

##### **4.1 Complaint handling process**

The Bank continuously improves the establishment of complaint acceptance channels on all fronts and actively optimises the complaint handling process. It displays “client complaint channels and handling processes” via offline channels such as the outlets across the Bank and private banking centres, as well as online channels such as the official website, mobile banking of both personal and corporate versions, WeChat official accounts such as “China Construction Bank”, applets such as “CCB Customer Service”, and Apps such as “CCB Huidongni”, and lists relevant information in the business product

and service agreement. The Bank’s complaint handling process is as follows:



- Complaint channels: Clients can make complaints and voice their concerns through various complaint channels (such as business outlets, service hotline and online channels, etc.) published by the Bank.
- Complaint handling: Complaints are addressed on site by staff at outlets, or handled by the complaint handling institutions, which shall reach a conclusion within 15 days and inform the client of the conclusion. For complex complaints, the deadline can be extended to 30 days, and the maximum processing period shall not exceed 60 days.
- Result feedback: After handling a complaint, the complaint handling institution will inform the client of the results. If the client has no objection to the handling results, the handling will be ended.
- Complaint verification: If the client has objections to the complaint handling results, he/she may submit an application in writing to the superior authority of the complaint handling institution for verification within 30 days from the date of receipt of the handling decision. Where there are objections to the verification decision, he/she may apply to the higher authorities of the complaint handling institution for verification step by step. If the client still disagrees with the verification results, he/she can ask the complaint

handling institution for the contact information of the local financial consumer dispute mediation organisation and apply for mediation, or resolve the dispute through arbitration, litigation or other channels.

#### **4.2 Complaint channels and processing mechanism**

The Bank has established diverse complaint channels. Through multiple service approaches such as the 95533 customer service hotline, “CCB Customer Service” WeChat official account, mobile banking live chat, online banking live chat, and SMS platform and by leveraging a variety of media interactions, including audio, text, and video, the Bank ensures that clients are provided with enterprise-level, intensive, intelligent, multi-functional, multilingual, and 24/7 services in a “human + AI” manner. In addition, the customer service centre is launched on the “CCB Lifestyle” App, sets up functions of hot issue guidance, robot customer service, online manual customer service, hotline customer service, complaint guide display and third-party service provider contact, so as to provide clients with clear, convenient and smooth feedback service, ensuring that client complaints and feedback can receive timely, professional and efficient response and processing.

The Remote Intelligent Banking Centre is staffed with specialised client complaint handling personnel to ensure timely response and feedback to client complaints. When receiving client complaints, the complaint handling personnel immediately provide solutions within the limits of authority, pacify the client and address the complaint by explaining online or quickly discussing with corresponding branches. For complaints that cannot be resolved online or exceed the limits of authority, the centre records the complaints and relevant information via the unified customer service platform, generates complaint work orders, quickly transfers them to the complaint handling institution, urges and supervises the second-call complaints from clients or overdue work orders, and handles complaints transferred from external institutions in a timely manner. In order to ensure service quality, the Remote Intelligent Banking Centre regularly conducts sample surveys on customer satisfaction to understand the outcomes of complaint handling and give feedback to the responsible complaint operations.

### **4.3 Complaint handling upgrading mechanism**

The Bank continuously optimises the consumer complaint handling escalation mechanism and makes the problem feedback channels public for consumers. According to the mechanism, the problems that cannot be solved by the complaint handling institutions or exceed their limits of authority shall be reported to the superior management operations of the business line level by level for coordination.

The Bank has implemented a special upgrading handling and coordination mechanism for each type of complaint to effectively ensure that complaints are addressed properly and prevent buck passing among institutions. Consumers who have objections to the consumer complaint handling results may submit a written application for verification to the superior operation of the handling institution. Consumers who have objections to the verification decision may apply for re-verification to the institutions with higher authority level by level. If consumers still have objections to the final results, they may ask the complaint handling institution for the contact information of the local financial consumer dispute resolution organisation and apply for mediation, or resolve the dispute through arbitration, lawsuit, etc.

## **5. Supervision and audit mechanisms on complaint management**

### **5.1 Supervision and verification of complaint handling**

The Bank has established a systematic complaint handling supervision and inspection mechanism. The Consumer Rights Protection Department is responsible for the supervision and inspection of complaints throughout the Bank. The Bank has set up complaint review bodies and appointed complaint review ombudsman to conduct special supervision and inspection of customer complaint handling, striving to ensure that each complaint can be handled fairly and professionally.

In terms of organisational structure, consumer protection departments are established at both Head Office and all tier-1 branches, while tier-2 branches and sub-branch outlets are designated departments responsible for consumer protection. These units are empowered with responsibilities to independently

accept, independently verify, and independently or jointly handle relevant complaints, conduct special supervision and inspections of complaint handling, and provide improvement and optimisation suggestions, ensuring that each complaint is handled in a fair and professional manner.

In terms of job arrangements, complaint review ombudsman are established within the consumer protection departments at both Head Office and branches, responsible for the circulation and verification of customer complaints, establishing complaint verification procedures, and defining complaint supervision mechanisms to ensure smooth end-to-end complaint review and processing, as well as independence of review, so as to provide customers with neutral, fair, objective and equitable handling. Dedicated complaint review ombudsman are designated across all business lines to receive and verify complaints within their respective lines, forming a complaint management system with tiered management, clear responsibilities and coordinated collaboration.

In terms of staffing, the Bank continues to strengthen the complaint management team. Dedicated ombudsmen are assigned within relevant Head Office departments, all tier-1 branches and tier-2 branches to be responsible for complaint management and complaint review. Consumer protection coordinators are also designated at outlets to review complaint-related matters at the frontline.

The Bank has set up a special complaint supervision hotline, which is answered and handled by complaint review ombudsman, and tracks the relevant complaints throughout the process. The Bank organises special inspections for major complaints, organises, coordinates and examines the solutions of key complaints, and evaluates the areas for improvement in which complaints were made, so as to increase the quality and efficiency of complaint handling, striving that client problems receive timely response, proper handling and effective settlement, and effectively ensuring the implementation of complaint supervision and management requirements.

If the customer disagrees with the Bank's verification results, they may apply for mediation through a financial consumer dispute mediation

organisation, or seek resolution through arbitration or litigation. Financial consumer dispute mediation organisations are independent, non-profit institutions established by associations such as the China Banking Association, which independently and impartially facilitate the coordination and resolution of complaint-related issues. The Bank actively cooperates with local third-party mediation organisations in establishing and improving mediation mechanisms, sets up an internal team of part-time mediators, and proactively participates in regional industry mediation activities. The Bank also develops demonstration practices for mediation, and provides personnel and venue support for third-party mediation work, thereby helping to resolve customer issues.

For the complaints forwarded by the regulators that have been reported to the Bank by customers but have not been satisfactorily resolved, the Bank has established a verification mechanism for complaints forwarded by the regulators. Complaint review ombudsman organises relevant departments of the Head Office and branches to conduct verification work. The verification process is completed within 30 days, after which feedback is provided to the complainant. The Bank effectively addresses problems identified through special inspections, which not only promotes the proper handling of customer problems, but also provides important reference for product and service optimisation.

## **5.2 Audit on complaint management**

The Bank strictly implements the requirements of the *Administrative Measures for Consumer Rights Protection Audit Management*, and continuously strengthens the supervision mechanism for consumer rights protection.

The Audit Department of the Bank is responsible for conducting internal audits on consumer protection, covering the implementation of complaint management work. The audit items include the effectiveness of the complaint handling framework and outcomes, the completeness of the complaint management system, the timeliness and standardisation of complaint tracking and handling, and the statistical analysis of customer complaints and related improvement outcomes. It oversees the performance of consumer protection

responsibilities such as complaint management across the Bank, provides management recommendations, and reports to the Related Party Transaction, Social Responsibility and Consumer Protection Committee of the Board of Directors, so as to effectively safeguard consumers' legitimate rights and interests. The Board's Related Party Transaction, Social Responsibility and Consumer Protection Committee regularly receives reports on consumer protection audits and supervises the effective implementation of corrective actions. In the first half of 2026, the Audit Department of the Bank organised special consumer protection audits as planned, covering Head Office and 10 tier-1 branches, focusing on the quality and efficiency of complaint handling, complaint source tracing and rectification, and diversified resolution of financial disputes.

## **(VII) Financial Education**

The Bank adheres to a “financial services for the people” approach and strictly follows regulatory requirements to build a professional and systematic matrix of financial knowledge education and publicity activities. Focusing on the differentiated characteristics of various customer segments, the Bank formulates tiered and segmented targeted education and publicity programmes and cooperates with various professional institutions to enhance the relevance and professionalism of such activities. Leveraging precise and targeted outreach, the Bank effectively enhances the public's risk awareness and promotes sound financial concepts, integrates financial literacy education into the national education system, and effectively fulfils responsibilities in consumer protection and social responsibility.

### **1. Public financial education and publicity**

The Bank focuses on public financial education, keeps improving the financial education and publicity mechanisms, enriches communication channels and expands the delivery coverage, opening a new chapter of public financial education. In the first half of 2026, the Bank formulated the *2026 Work Plan on Financial Consumer Education* to clarify the tasks of and requirements on financial consumer education for the year to ensure the orderly development of the Bank's consumer protection education and publicity work.

The Bank promotes financial education and publicity activities on a regular basis through offline outlets and online channels. In March 2026, the Bank organised the “3·15” consumer rights protection education and publicity campaign through unified arrangements via both online and offline channels. Focusing on the campaign theme and addressing hot and difficult social issues, the Bank carried out financial knowledge dissemination for the general public and key customer groups, including the “Two Drivers and Two Delivery Workers<sup>8</sup>”, elderly customers, new urban residents and foreign visitors to China through all channels, all media and all networks. The Bank organised a total of 74 thousand activities and reached 760 million consumer contacts, generating positive social impact.

The Bank continues to strengthen cooperation with various educational institutions in financial education and publicity work. In 2025, all 37 tier-1 branches of the Bank cooperated with local financial education institutions to carry out financial knowledge education and publicity activities. First, the Bank cooperated with financial education institutions such as universities, specialised societies and industry associations, leveraging their professional advantages to enhance the professionalism of financial consumer education. Second, the Bank cooperated with educational institutions such as universities, community colleges, universities for the elderly, and primary and secondary schools to organise diversified financial knowledge publicity activities, expanding the coverage of financial education and promoting the improvement of public financial literacy. In the first half of 2026, the Bank continued to maintain close cooperation with various financial education institutions.

## **2. Financial education for key client groups**

The Bank continues to expand the coverage of financial education and publicity and solidly carries out the “Five Entrances” financial publicity initiative (into schools, communities, countryside, enterprises and business districts). The Bank prioritises allocating education and publicity resources to underserved areas such as rural regions, ethnic minority areas and remote

---

<sup>8</sup> Two Drivers and Two Delivery Workers: truck drivers, ride-hailing drivers, food delivery couriers and express delivery couriers.

regions, and focuses on key customer groups including elderly customers, students, new urban residents, ethnic minorities, persons with disabilities and rural customers to carry out tailored and innovative financial education activities that meet their needs, actively fostering a positive atmosphere of “learning finance, understanding finance, trusting finance, and using finance”. Through the development of distinctive “Four-One” initiatives, the Bank continuously enhances the effectiveness of consumer protection education and publicity.

**Promoting “One Platform”.** Leveraging technology to strengthen digital financial education, the Bank has established a financial education zone within the online “Colourful Consumer Protection 3D Digital Education Exhibition Hall” to regularly disseminate inclusive financial knowledge, enhance online interactive experiences, and systematically demonstrate the achievements of financial services for the people. For example, Guangxi Branch has innovatively introduced intangible cultural heritage folk songs and digital human interaction to deliver smart and localised education and publicity. Branches in Henan, Gansu and other regions have used the digital exhibition hall to provide tiered financial education for elderly customers, new urban residents and new employment groups, while simultaneously interpreting inclusive finance policies, achieving dual empowerment of risk education and public-benefit services.

**Building “One Vehicle”.** Focusing on key customer groups to strengthen inclusive financial education, the Bank utilises financial consumer protection publicity vehicles to conduct mobile and scenario-based education. The Bank promotes elderly-friendly financial services for elderly customers and helps bridge the digital divide, while also disseminating employment-related financial policies to new employment groups. For example, Anhui and Tianjin branches have leveraged airport screens, commercial district displays and taxi rooftop lights to deliver public service announcements, embedding financial consumer protection publicity into everyday urban public spaces.

**Advancing “One Initiative”.** Deepening grassroots financial education in rural and county areas, the Bank has launched the initiative “Protect Personal Information, Safeguard Credit Security” for rural residents, guiding the public to value personal credit and stay away from illegal financial activities. Leveraging “Yunongtong” service sites, the Bank extends financial education to the “last

mile” in rural areas. For example, Jilin Branch has conducted anti-fraud, anti-counterfeiting and anti-illegal fundraising education in border townships and remote forest areas, while Hunan Branch has innovatively launched a “Financial Market + Fireworks Show” initiative to popularise financial consumer protection concepts in an engaging and accessible manner.

**Issuing “One Reminder”.** Focusing on consumption scenarios to enhance risk education, the Bank deeply integrates consumer finance scenarios, promotes interest subsidy policies among merchants to support consumption, and conducts regular on-site risk reminders to safeguard customers’ accounts and funds. For example, Xinjiang Branch has carried out bilingual financial education in business districts, while Qinghai, Inner Mongolia and Jiangxi branches have delivered customised and immersive financial risk education activities based on local tourism, grassroots teams and cinema scenarios, continuously expanding the coverage and impact of financial consumer protection education.

### **2.1 Two Drivers and Two Delivery Workers**

The Bank has strengthened targeted financial services and knowledge dissemination for the “Two Drivers and Two Delivery Workers” new employment groups. In particular, more than 30 branches, including Shaanxi, Yunnan and Hunan, have conducted “five-minute morning briefing” micro-sessions in logistics parks, delivery stations and courier service stations, and set up “bench classrooms” at freight hubs to precisely raise awareness of various financial fraud risks faced by practitioners. Jiangsu Branch has created an “in-cabin financial education” scenario, Fujian Branch has appointed members of the new employment groups as mobile publicity ambassadors, and Shanxi Branch has provided customised financial knowledge services for frontline urban management personnel, achieving multi-point coverage of education scenarios and precise outreach to target groups. Zhejiang Branch has built “courier hubs” that provide warm services such as drinking water, resting areas and charging facilities, while also delivering targeted anti-fraud education and rights protection awareness, safeguarding the city’s workers with care and bringing financial warmth to their daily journeys.

## **2.2 The elderly clients**

The Bank continues to deepen elderly-friendly financial education and publicity for elderly customers. Towards 269 million elderly clients, the Bank has developed a distinctive “nursing care + smart care + health care” service system, and carries out financial knowledge education on pension finance in communities to help elderly customers adapt to digital life. The Bank also optimises service offerings tailored to the learning needs of elderly customers through large-print educational leaflets and the “Smart Bank” AI assistant in mobile banking. In particular, branches in Shanghai, Fujian, Heilongjiang, Shanxi, Guangxi and other regions have collaborated with universities for the elderly to promote anti-fraud and rational investment knowledge through cultural and sports activities combined with real-life cases. Sichuan Branch designates the 19th day of each month as “Elderly Day” across the province, and works with the Elite Clinic of Chengdu University of Traditional Chinese Medicine to provide free medical consultations and lectures, while delivering anti-fraud and age-friendly service education in elderly care institutions and universities for the elderly, helping to bridge the “digital divide” and address risk identification challenges among elderly people. Beijing Branch organised a “3·15” financial education campaign at The Seniors University of China, highlighting various online marketing tactics and associated risks, so as to help elderly customers enjoy safe and secure financial services.

## **2.3 New citizen clients**

The Bank provides 137 million new citizens with integrated financial education and publicity services, and established the “Colourful Consumer Protection” channel on dedicated mobile application, receiving more than 47.29 million views. Combining financial services with public-benefit policies that support people's livelihoods, the Bank provides financial knowledge education and promotes account security awareness among new citizen clients. Among these efforts, branches in Shaanxi, Jiangsu, Fujian, Zhejiang and other regions have carried out “micro-sessions” and “bench classrooms” in industrial parks, service stations and courier hubs, helping safeguard the financial rights and interests of new employment groups.

## **2.4 Ethnic minority clients**

The Bank provides diversified financial education and publicity services for ethnic minority customer groups. Adhering to the principle of “no difference” in service, the Bank works to overcome language barriers and continuously broadcasts eight original consumer protection folk songs in ethnic minority languages, receiving a cumulative of 39 million views across online platforms. Among these efforts, Guangxi Branch launched financial education and publicity programmes featuring intangible cultural heritage folk songs and carried out bilingual publicity campaigns in commercial districts, while branches in Yunnan and Guizhou conducted financial knowledge education activities in ethnic minority villages to enhance financial literacy among local residents.

## **2.5 Teenagers and students**

The Bank strengthens financial education for youth and student groups and promotes the “ ‘Golden Bee’ Goes to Campus” brand. Leveraging the “CCB Smart Campus Application” platform, the initiative covers more than 400 universities nationwide and reaches over 2.8 million teachers and students. Shaanxi Branch cooperates with universities such as Xi’an Jiaotong University and Shaanxi University of Chinese Medicine to hold regular financial security seminars each semester, integrating knowledge on preventing illegal securities activities into campus health service days, helping students strengthen financial risk prevention and enhance rational rights protection awareness. Zhejiang Branch cooperates with multiple universities within its jurisdiction, organising activities such as the “Campus e-Finance Anti-Fraud Video Competition” initiative at Zhejiang College of Shanghai University of Finance and Economics, implementing the “Campus Banker” student practice programme at Huzhou University, and sending the “Zhang Fuqing Financial Service Team” to Zhejiang Ocean University to conduct case-based education focusing on scams such as rebate fraud, campus loans and fake online refunds. Guangdong Branch cooperates with multiple primary and secondary schools to advance youth financial education, regularly delivering financial literacy courses on campus to help students acquire basic financial knowledge and develop sound financial and consumption concepts.

## **2.6 Clients with disabilities**

The Bank promotes accessible financial education and publicity services for customers with disabilities, and organises employee training in sign language skills to assist special groups in using barrier-free financial services. In particular, branches in Gansu, Ningxia and Tianjin have carried out dedicated outreach activities in disability service centres, while Sichuan Branch has piloted remote video-assisted services to address difficulties faced by customers with mobility impairments in accessing banking services.

## **2.7 Clients in rural areas**

The Bank strengthens inclusive financial education in rural areas by leveraging “Yunongtong” service sites and the “Yunong School” platform to promote financial knowledge and cultivate a culture of integrity. The Bank carries out targeted risk warning education in high-risk areas and conducts various special campaigns on risk awareness and governance. It uses short videos, animations and other formats to expose common tactics of illegal financial activities, and strengthens risk alerts on issues such as illegal insurance surrender intermediaries, professional debt evasion schemes, bank card fraud and irregularities in online lending. In particular, Guangdong Branch focuses outreach on vulnerable groups with higher fraud risk, while Xiamen and Suzhou Branches innovate with livestreaming and traditional performing arts-based financial education formats. At the same time, the Bank smooths consumer complaint channels and strengthens publicity on diversified dispute resolution. Branches in Sichuan, Shanghai and Liaoning promote financial education integration into grassroots governance through online services, themed campaigns and community service stations.

## **3. Upgrading digital financial education**

The Bank fully relies on digital methods to integrate financial education into various real-life scenarios, empowering business development. The Bank has established a digital financial education zone to build the digital consumer protection education section that integrates knowledge, functions and interactions. In major digital marketing campaigns of “Benefit Season” in 2026, the education section accumulated 120 million visits. The Bank has built the

“Colourful Consumer Protection 3D Digital Exhibition Hall” financial education main battlefield, with a cumulative number of registered users of 35.00 million. The Bank has created a financial education exhibition hall matrix of the “Head Office + branch” model, with the Head Office and each branch exhibition hall with local characteristics. 35 characteristic halls at branches have been opened, focusing on the modern elements of “humanities + technology”.

### **III Privacy Protection and Data Security**

The Bank continuously improves the privacy and data security governance framework, strengthens the compliance foundation for privacy protection and data security, and deepens the development of the institutional system. The Bank iteratively upgrades technical protection measures, enhances the management of third-party data and privacy, and regularly conducts internal and external audit supervision. The Bank also promotes employee empowerment and capability building, continuously improving the management level of privacy and data security protection, and safeguarding the privacy and data security of individual customers in an all-round manner.

#### **(I) Privacy and Data Security Management Structure**

##### **1. The Board of Directors**

The Bank attaches great importance to privacy and data security management. The Board of Directors assumes the main responsibility for data security work, including approving the basic data security management system and listening to reports on important data security matters. The Board of Directors and special committees are responsible for approving and monitoring the implementation of information security strategies. They integrate IT risk into the Group's risk preferences, continuously strengthen security operation and maintenance capabilities, and improve the capabilities for preventing and controlling IT and cybersecurity risks, protecting clients' privacy and the Bank's information and financial security. They keep deepening IT system disaster recovery and drills and improve information security and privacy protection capabilities through concrete efforts.

The Risk Management Committee of the Board of Directors is responsible for overseeing and guiding IT and cybersecurity risk control and management, and regularly listens to reports on IT and cybersecurity risk management and control. In the first half of 2026, the committee listened to and discussed the *Report on IT Risk Management in 2025*, studied IT risk identification & assessment, monitoring, control, and the risk landscape, along with related work plans, and provided guidance on strengthening network and information security, business continuity, IT outsourcing, and new technology applications.

The Related Party Transaction, Social Responsibility and Consumer Protection Committee of the Board of Directors is responsible for supervising, guiding and promoting the work on privacy and data security protection of personal customers, regularly listens to reports on the progress of the work, oversees the implementation and execution of relevant initiatives, guides the Management to improve the relevant systems, processes, tools, and the development of human resources, and enhances the quality & efficiency of the work on the protection of the privacy and data security of personal customers. In the first half of 2026, the committee carried out thematic study about the *Report on the Progress of the Work Related to Privacy and Data Security Protection*, and guided the Management to improve personal information protection mechanisms and processes, optimise the data security technology system, strengthen security management of third-party cooperation, and further enhance the Bank's privacy and data security management capabilities and level of granularity.

## **2. The Management**

The Management of the Bank has set up the FinTech and Digitalisation Promotion Committee headed by executives of the Bank. The Committee has 12 member units, including Head Office departments, operations directly under the Head Office and subsidiaries. It is responsible for executing the strategic requirements and decisions of the Board of Directors and the President's Executive Meeting on the Bank's digital transformation. It coordinates the research of development strategies and business directions relating to financial technology, data governance and application, online platform development, intelligent operations and channel integration, and digital RMB business. It also oversees major matters relating to digital transformation mechanisms and related infrastructure, enterprise-wide demand coordination, fintech projects, middle-platform development, data security, personal customer information protection, product innovation and management, and artificial intelligence applications, ensuring the effective implementation of the Bank's strategy in the field of digital transformation.

## **3. The execution**

The Bank has established an execution system for privacy and data security protection work with clear-cut work allocation and responsibilities:

The Data Management Department of the Head Office leads and coordinates the protection of personal customer information and data security management work across the Bank, organises the planning and implementation of data security management and data security risk assessment. The data security division, as the special designated division for data security management, carries out the specific work. The FinTech Department, the Operational Data Centre, etc., of the Head Office are jointly responsible for data security in IT field, and the business departments are responsible for putting in place data security management requirements in their corresponding business fields. The Risk Management Department and the Internal Control & Compliance Department of the Head Office are responsible for the implementation of data security risk management, internal control evaluation, accountability and penalties, etc., within their scope of duties. The Audit Department of the Head Office takes the responsibility of performing information security and privacy protection related audits. All branches and sub-branches assume primary responsibility for data security within their jurisdiction and perform localised administration. They strictly implement local policies and regulations relating to data security and actively control and manage data security risk within jurisdiction to ensure data security.

## **(II) Privacy and Data Security Policies and Specifications**

The Bank continues to improve the system and management mechanism, strengthens the Group's overall planning, clarifies management requirements, and organises all tier-1 branches and subsidiaries to improve the data security management and personal customer information protection work process & mechanisms within their jurisdiction, and consolidates their primary responsibilities. The Bank optimises the *Personal Information Protection Policy Overview*<sup>9</sup> to further enhance the public's understanding and awareness of the

---

<sup>9</sup> *Personal Information Protection Policy Overview*: [https://en.ccb.com/eng/2023-08/01/article\\_2023080117440210471.shtml](https://en.ccb.com/eng/2023-08/01/article_2023080117440210471.shtml)

Bank's personal customer information protection policy. The Bank establishes a data security assessment mechanism, issues the *Implementation Rules for Data Security Protection Impact Assessment*, and refines the pre-assessment process and requirements around key scenarios such as third-party cooperation and data transfer to strengthen data security risk management and control.

## **1. Privacy protection**

The Bank attaches great importance to and effectively protects individuals' rights of personal information. The Bank continues to strengthen the protection of clients' personal privacy and keeps intensifying the restriction of relevant policies and specifications. The Bank has formulated personal information protection related policies covering all business lines and affiliated units of the bank, guiding all employees to comply with personal information security protection requirements and strictly implement the protection measures. The Bank strictly implements the requirements regarding "notification and consent" and the protection of minors' information in the process of providing products and services, and makes sure to obtain clients' authorisation before using their personal information. The Bank applies the functions of obtaining client consent, withdrawing consent, re-obtaining consent and case-by-case authorisation and consent on mobile banking and other platforms. In the first half of 2026, the Bank organised all tier-1 branches to carry out self-inspections on personal customer information protection to ensure the effective implementation of relevant requirements.

### **1.1 Privacy protection principles**

The Bank adheres to the following principles in protecting clients' privacy, including matched right and responsibility, explicit purpose, informed consent, minimal necessity, hierarchical authorisation, security assurance, fairness and reasonableness, openness and transparency, integrity and information quality. It strictly abides by laws and regulations, and takes appropriate measures to fully protect clients' personal information.

### **1.2 Privacy protection policy**

In accordance with the *Personal Information Protection Law of the People's*

*Republic of China* and the *Data Security Law of the People's Republic of China* and other legal requirements, the Bank has issued and implemented the *Management Measures for Personal Customer Information Protection* and the *Operational Procedures for Personal Customer Information Protection Impact Assessment*, further standardising the handling process of personal customer information. These measures clarify the allocation of responsibilities of the departments of the Head Office and tier-1 branches in this regard, as well as the requirements on the full lifecycle management<sup>10</sup>, emergency management mechanisms, and supervision and management, so as to further standardise the handling process of personal customer information, provide guidance for the high-quality and orderly implementation of personal information protection across the Bank, and continue to improve the Bank's institutional system on personal customer information protection.

According to the requirements of laws and regulations, the Bank continuously revises the personal information protection policies of channels, product services, privacy authorisation agreements and other agreement texts, and optimises the “notification-authorisation” business processing procedure.

The Bank has publicly disclosed the *Personal Information Protection Policy Overview*, which displays the institutional framework of personal information protection policies in a systematic way and provides public contact information, with the focus on the functional division, management mechanisms, implementation process and standardised measures:

- Standardising the collection and use of personal information and defining personal information, which means all kinds of information that have been recorded electronically or by other means and relating to identified or identifiable natural persons, excluding information that has been anonymised. The above-mentioned personal information mainly includes identity information, property information, account information, identification information, financial transaction information, borrowing and

---

<sup>10</sup> Full lifecycle covers phases including “client notification-consent, the collection, transmission, use and cross-border provision of information, the right of portability, deletion, destruction, third-party cooperation management and impact assessment”.

lending information, and other information that reflects certain situations of specific individuals.

- The purpose of collecting and using personal information is to provide clients with quality products or services according to laws and regulations. This includes identifying and verifying personal identity for the protection of account and e-CNY wallet security; assessing the capability and conditions for contract fulfilment for business access and risk prevention and control; necessity for the provision of products or services; protecting fund security; improving client relationship and service experience; fulfilling statutory obligations (e.g., anti-money laundering obligations); other purposes prescribed by laws and administrative regulations or approved by clients.
- The methods for collecting personal information include: collecting information provided by clients on their own initiative when providing financial services; collecting service-related information formed during the process of providing financial services; collecting credit information and behaviour information of clients from credit investigation agencies, credit management companies, credit evaluation agencies or similar agencies permitted by relevant legal and regulatory institutions; collecting information that is necessary for services from government bodies, judicial authorities, and public institutions; collecting information that is necessary for the services provided by the Bank, when authorised by the clients, from natural person, legal person and other organisations that retain client information; any other methods prescribed by laws and administrative regulations or permitted by clients.
- The scope and purpose of personal information collection: when providing products or services for clients, the Bank will collect information entered by clients on their own initiative in the process of using the Bank's products or services or generated during the use of products and services. The types of personal customer information collected herein shall be directly related to the realisation of the business functions of products and services and no client information irrelevant to the business will be collected.

- Scenarios involving the use of personal information include: maintaining and improving business functions when providing clients with the Bank's products or services as authorised; continuously collecting and using information with client authorisation during the ongoing financial service period; summarising, statistically analysing and processing the usage of services (excluding identification information) to improve product or service experience and prevent risks; sending service status notifications and commercial information about related products or services to clients on the premise of obtaining their independent and voluntary consent; other purposes as authorised by the client, necessary for the performance of statutory duties or obligations and permitted by laws and administrative regulations.
- Filing, protecting and retaining time boundaries of clients' personal information. When the Bank ceases to provide financial products or services, the Bank will immediately stop client information collection and data analysis and application activities, unless otherwise regulated by relevant governing departments of the state and the industry.
- Relevant provisions on using Cookie and similar technologies, and on sharing, transferring or disclosing clients' personal information.
- Granting rights to control personal information, including acquisition/access, rectification, deletion, portability, restriction of processing, withdrawal of authorisation, and refusal of processing.

## **2. Data security**

The Bank keeps refining the policy system for data security and information protection and building a complete institutional framework. The Bank formulated and issued multiple regulations and policies on data governance and information security, including the *Management Measures for Data Security* as the core basic policy, and simultaneously issued the *Implementation Rules for Classified and Hierarchical Data Protection*, the *Contingency Plan for Data Security Incidents*, the *Implementation Rules for Data Security Protection Impact Assessment* and the *Regulations on the Security Management of Third-Party Cooperation Data*. The Bank establishes a sound institutional

management system concerning data security and privacy protection by specifying the allocation of responsibilities and refining management strategies. The Bank's data security policies have already covered all business lines and domestic and overseas operations. Overseas operations are required to abide by laws and regulations and industry regulatory requirements of the countries (regions) where they are located.

### **(III) Granting Client Rights to Control Personal Information**

The Bank strictly abides by relevant laws, regulations, and regulatory requirements to fully protect clients' control over personal information. The scope and specifications of exercising the rights include the right to know, acquiring/accessing, correcting, deleting and transferring personal information; the owner of personal information cancelling account; restricting the automated decision-making by information systems, and timely responding to the abovementioned requests from clients.

#### **1. Right to acquire/access information**

Clients have the right to acquire a copy of personal information when accessing personal information. When clients request to consult and copy their personal information or request explanations of the information processing rules, the Bank provides relevant information or processes such requests within the scope permitted by laws, regulations, and industry norms and ensures that the legitimate rights and interests of other institutions and clients are not infringed upon. Clients have the right to access personal information through the Bank's international website, online banking, mobile banking, telephone banking and other channels, unless otherwise prescribed by laws and administrative regulations.

#### **2. Right to rectify information**

Clients can choose to rectify personal information at outlets. In principle, this shall be conducted by the clients themselves. However, certain information such as fixed telephone numbers, contact addresses, work addresses, occupation information, nationality, and document expiration dates could be handled by representatives on behalf of the clients, subject to verification of the

representatives' and the clients' valid identification documents and related supporting materials at outlets, where the information of the representatives should also be collected. Where the regulatory authorities regulate otherwise, the relevant regulations shall prevail. Clients have the right to correct and update personal information through the Bank's international website, online banking, mobile banking, telephone banking and other channels, unless otherwise prescribed by laws and administrative regulations.

### **3. Right to delete information**

Clients are entitled to delete their personal information. Deletion of personal customer information refers to the act of completely removing personal customer information from various systems involved in the realisation of daily business functions to ensure that relevant information is in a state that cannot be retrieved and accessed, so as to fully protect client information security and privacy. Under any of the following circumstances, the Bank would voluntarily and promptly delete personal customer information without undue delay. If the Bank fails to delete relevant information, clients have the right to request the Bank to delete. The Bank attaches great importance to such requests and responds promptly to effectively protect the legitimate rights and interests of clients:

- The processing of personal information by the Bank violates laws and regulations;
- The Bank collects or uses personal information without client consent, or the consent has been withdrawn;
- The processing of personal information by the Bank violates the agreement with clients;
- Clients cease to use the Bank's products or services, or cancel the accounts;
- The Bank ceases to provide products or services, or the storage period of personal customer information has expired;

- The purpose of personal customer information processing has been achieved, cannot be achieved, or is no longer necessary for achieving the processing purpose;
- The Bank unavoidably collects personal customer information that is unnecessary or is not permitted by the clients when using automated collection technology; or
- Other circumstances as prescribed by laws, regulations, or administrative regulations.

If the client's request of deletion is decided to be responded, the Bank will, at the same time, notify the entities that obtain personal information from the bank, requiring them to delete the information in a timely manner, unless otherwise prescribed by laws and regulations, or the entities have obtained independent authorisation by clients. When clients delete information from the Bank's services, the Bank may not immediately delete the corresponding information from the backup system, but will delete the information when the backup is updated. Where the storage period as prescribed by laws and administrative regulations does not expire, or it is technically difficult to realise the deletion of information, the Bank will stop processing personal information other than storing and taking necessary security measures.

#### **4. Right to transfer information**

Clients are entitled to transfer their personal information. Where the conditions prescribed by laws and administrative regulations are met, clients have the right to request the Bank to transfer their personal information to other personal information processors. The Bank will provide personal information in a format that facilitates subsequent processing, and use technical means to ensure data security during transferring. The Bank shall provide the means for such transfer if it is technically feasible or the conditions prescribed by the Cyberspace Administration of China are met. When assisting clients in transferring their information, the Bank will delete data that may violate the rights of others.

#### **5. Right to cancel accounts**

The registered users of the Bank's products or services can go to the

outlets for account cancellation through channels such as the counters of the Bank, E-mobile terminals or self-service devices. They can also cancel accounts by themselves via mobile banking, online banking, SMS financial services, international websites and other channels according to the relevant business regulations.

## **6. Restricting automated decision-making in information systems**

In certain business functions, the Bank may make decisions based solely on non-human automated decision-making mechanisms including information systems and algorithms. Clients have the right to seek an explanation from the Bank if these decisions significantly affect their legitimate rights and interests, and the Bank will provide appropriate solution. The Bank follows the principle of fairness and reasonableness when using automated decision-making. When carrying out information push and marketing to clients through automated decision-making, the Bank also provides options that are not targeted at personal characteristics, or offers convenient refusal methods to individuals. When making decisions that have significant impacts on the clients' rights and interests through automated decision-making, the Bank will make an explanation to clients. Clients have the right to refuse decision-making solely by automated means.

## **7. Right to know the collecting and processing of personal information**

Before processing client information, the Bank will authentically, accurately and completely inform clients of the processing of personal information through privacy protection policy, personal information authorisation agreement, and other relevant documents, in clear and understandable language and noticeable way. Where processing of sensitive personal information is involved, the Bank will inform clients of the necessity of processing their sensitive information and the impact on them. The processing of personal customer information by the Bank is based on client consent, which should be voluntarily and explicitly given by the clients on the premise that the clients are fully informed of, except for where laws and administrative regulations require and

no consent of individuals is needed. Before providing client information for overseas parties, the Bank will obtain the independent consent of clients and fulfil the security assessment process required by the Cyberspace Administration of China.

Please refer to *Personal Information Protection Policy Overview* for the details on other rights of control over personal information granted to clients.

## **(IV) Privacy and Data Security Protection Technologies and Initiatives**

The Bank strictly implements privacy and data security protection initiatives, continuously deepens the lifecycle data security management mechanism, and adheres to the principles of data minimisation in collection and retention. The Bank improves the data security technical protection system featuring “prevention from external attacks and theft, prevention from internal data leakage, joint prevention of third-party data leakage, and comprehensive security monitoring”, and further advances data classification and hierarchical protection to precisely match differentiated security strategies. The Bank strengthens unified management of privacy authorisation, continuously optimises operational control mechanisms for personal customer information protection, and comprehensively strengthens the protection of customer privacy and data security.

### **1. Strengthening the lifecycle data security management mechanism**

The Bank has established a data security and privacy protection management system covering the entire product lifecycle, including product requirement analysis, design, development and operations and maintenance. The Bank has formulated the *Administrative Measures for Product Innovation and Management of China Construction Bank*, which clearly stipulates that comprehensive risk controls must be strictly implemented before product launch, including consumer protection review, data security assessment and reputational risk management measures. The Bank’s data management department is responsible for establishing a product data security risk assessment mechanism, while the FinTech department is responsible for

organising system development and supervising the implementation of product development requirements and data standard requirements. By strengthening institutional framework development, clarifying management responsibilities and implementation procedures, the Bank enhances the identification, assessment and monitoring of privacy and data security risks related to products, achieving end-to-end closed-loop management from requirement initiation to post-launch monitoring, and comprehensively improving the data security protection capability and resilience of core products and services.

### **1.1 Requirement analysis and design assessment**

**Technical R&D governance system.** At the source of requirement analysis and design, the Bank embeds data classification and hierarchical protection requirements into the management systems and technical standards, and explicitly requires the identification and submission of data security requirements at the requirement initiation stage, ensuring that data security requirements are implemented in parallel with business requirements. The Bank conducts comprehensive analysis of security risks faced by application systems and, in accordance with information system's network security protection levels, commercial cryptography application levels and data security classification protection technical requirements, assesses security requirements and designs control measures in terms of identity authentication, access control, security audit, transaction integrity, anti-replay mechanisms and data security protection, ensuring that technical requirements are embedded at the architectural design stage.

**New product design assessment mechanism.** The Bank has established a strict proactive risk assessment mechanism, clearly defining the data security impact assessment as a mandatory prerequisite for product launch, covering all new products. When launching new products, product management departments at both Head Office and branch levels are required to fully consider data security risks and complete the *Data Security Impact Assessment Form for New Products* based on product policies, service agreements, business requirement specifications and operation manuals, forming self-assessment results. The assessment focuses on the legality and minimum necessity of data processing purposes as well as the effectiveness of

security measures, ensuring that compliance risks are effectively controlled ex ante.

### **1.2 Development, testing and launch controls**

The Bank has established cybersecurity governance standards and control processes covering the full development lifecycle of application systems, including requirement analysis, design, coding, testing and production deployment.

During development, the Bank strictly separates development/testing environments from production environments. Data used in development and testing environments is desensitised, and the use of non-desensitised production data in testing environments is strictly prohibited. Software coding follows secure coding standards to effectively control code vulnerabilities and defects.

During the testing phase, the Bank verifies system security protection capabilities through security testing, including code security scanning, open-source component vulnerability scanning, mobile application static security scanning, privacy compliance testing and malware detection scanning, with a focus on evaluating and testing application business logic security to prevent unauthorised access and privilege escalation defects.

Before production deployment, all vulnerabilities and defects identified in security testing must be fully remediated, and systems with viruses, high-risk vulnerabilities or suspicious code are strictly prohibited from going live.

### **1.3 Operational monitoring and continuous optimisation**

After product launch, the Bank establishes continuous monitoring mechanisms to achieve full-process technical supervision from R&D to production environments. The Bank continuously strengthens data security monitoring, focusing internally on cross-domain data flows such as from production environments to office or development/testing environments and from internal institutions to external parties, and conducts regular external monitoring for data leakage risks, promptly assesses and properly handles security intelligence, ensuring early detection, early warning and early response. A dynamic review mechanism is established to periodically assess privacy

protection performance based on customer complaints, cybersecurity incident notifications, updates in laws and regulations, and occurrence of data security incidents. Through lifecycle closed-loop management of product privacy and data security, the Bank promptly identifies areas for improvement, ensures continuous compliance with regulatory requirements, and safeguards user rights and interests.

## **2. Minimal data collection and retention**

### **2.1 Minimal data collection**

The Bank strictly abides by the *Cybersecurity Law of the People's Republic of China*, the *Data Security Law of the People's Republic of China*, the *Personal Information Protection Law of the People's Republic of China* and other relevant laws and regulations. Adhering to the principle of minimal necessity during the collection of personal customer information, the Bank clearly informs clients of the processing measures through full lifecycle of data, including personal information collection, storage, processing, transmission, provision, disclosure, and deletion in various public texts such as privacy policies and authorisation agreements.

Before collecting client information, the Bank strictly follows the “client notification-consent” process to authentically, accurately and completely inform clients of the processing of personal information in clear and understandable language, whereby clients voluntarily and clearly make well-informed decisions about giving consent. The personal customer information collected by the Bank is used to realise the business functions of the products or services.

During the collection of personal customer information, the Bank shall not use fraudulent, deceptive, or misleading methods, and shall clearly inform the function of personal customer information collection associated with products or services. The Bank strictly prohibits obtaining personal customer information through illegal channels, and does not collect client information by using improper means or coercion. Clients are not required to provide generalised authorisation for the processing of personal customer information. The Bank pays attention to the quality of information to avoid the adverse impact on the rights and interests of clients caused by inaccurate and incomplete information.

When clients request to correct or supplement personal information due to inaccuracy or incompleteness, the Bank will correct and supplement it in a timely manner after verification. When collecting client information through automated means, the frequency of collection is the lowest necessary to fulfil the functions of the products or services.

When ceasing to provide relevant financial products or services, the Bank will stop the information collection and data analysis and application of the client information. Where national or industry authorities have other provisions, the relevant provisions shall prevail.

## **2.2 Minimal data retention**

The Bank retains personal customer information for the shortest period necessary to achieve the authorised purposes, except as otherwise required by law or administrative regulations. After the retention period expires, personal customer information will be either deleted or anonymised. If the retention period stipulated by law or administrative regulations has not expired or it is technically difficult to delete personal customer information, the Bank will only retain the storage and take necessary security measures, and will not perform other processing. When ceasing to provide relevant financial products or services, the Bank will simultaneously stop the information collection and data analysis and application, but if the national or industry authorities have other provisions, the relevant provisions shall prevail.

The Bank complies with the management requirements of data classification and hierarchical protection when storing personal customer information and data. For paper materials, the Bank specifies detailed requirements for the protection of paper files of personal customer information in business management system or process, determines the risk control process and authorisation & approval mechanism for the storage and transfer of paper files, to strictly manage and control the paper documents containing personal customer information.

## **3. Promoting data classification and hierarchical protection**

The Bank has issued the *Implementation Rules for Classified and Hierarchical Data Protection*, established specifications for data classification

and hierarchical recognition, specified classified and hierarchical data management and protection requirements, and conducted data classification and grading based on sorting of data resources. The Bank clearly defines the working steps for the implementation and dynamic adjustment of data classification and grading, as well as classification and hierarchical protection requirements for data at different security levels in activities such as collection, processing, use and external sharing. In addition, the Bank has applied machine learning to develop an automatic grading model of data security to realise automatic preliminary decision of data security level. With this model, combined with manual recheck, the Bank has completed classification and grading labelling based on the data dictionary, which serves as an important basis for adopting differentiated security protection measures. The Bank has established a data classification and hierarchical directory and implemented dynamic management, exploring the structured content identification and classification labelling of unstructured data to enhance the foresight and comprehensiveness of data classification and hierarchical management. Meanwhile, the Bank strengthens the identification and proposal of data security requirements, promoting the simultaneous launch with business requirements to balance business development with security protection.

#### **4. Continuously improving technology-enabled data security protection capability**

The Bank, leveraging the enterprise-level “Security as a Service” security architecture, has established and continuously improved a data security technical prevention and control system featuring “prevention from external attacks and theft, prevention from internal data leakage, prevention from third-party data leakage, and comprehensive security monitoring”. In 2026, the Bank developed enterprise-level endpoint sensitive data scanning and data destruction tools to enable identification, classification, encryption and destruction of sensitive data on endpoints. The Bank completed the integration of enterprise instant messaging systems with enterprise application-level sensitive data detection capabilities, enabling identification and blocking of sensitive data in cross-domain data transmission. The Bank also added alert functions for endpoint data external copying and antivirus scanning, and

introduced technical monitoring indicators for endpoint risks of overseas institutions. The Bank promoted the integration of data desensitisation tools on the artificial intelligence platform to enable centralised desensitisation of training data. In addition, the Bank conducted research on the security of post-quantum cryptography algorithms and, under regulatory guidance, participated in pilot studies and exploratory verification of post-quantum cryptography migration.

### **5. Conducting unified management of privacy authorisation across the Bank**

The Bank has established a client privacy authorisation management platform, integrated authorisation contracting information of client privacy data from various business lines, and developed a cross-line and cross-system management component of client authorisation across the Bank. The Bank strengthens the compliance management and security control of the use of personal data, develops approval procedures of authorisation template, authorisation agreement and authorisation record, standardises agreement information management and data authorisation management procedures, and uniformly manages authorisation for personal tranquillity rights, privacy, individual consent, and other scenarios. In addition, the Bank comprehensively implements scenario-based and differentiated management of client information service, minimises the disturbance to clients and effectively protects the relevant rights and interests of personal customers.

### **6. Comprehensive monitoring and analysing of data leakage**

The Bank continuously strengthens both internal and external data security monitoring and enhances technical monitoring scenarios for data security. Internal monitoring focuses on cross-domain data flow scenarios, including the use of production data, data copied to USB devices by employees, and the risk monitoring of sensitive outbound emails. External monitoring focuses on data leakage across the internet, as well as technical monitoring scenarios relating to phishing websites, spoofed websites, and counterfeit apps designed to obtain customer information.

### **7. Verifying the effectiveness of the technology-enabled data**

## **security protection system**

The Bank adopts multiple measures to test and enhance the effectiveness of network and data security technical safeguards. The Bank actively participates in national and industry-organised cyber range offensive and defensive exercises, and regularly conducts internal group-level cyber security drills. In March 2026, the Bank organised a group-wide cyber security offensive and defensive exercise, simulating real-world cyberattack and defence scenarios, and incorporated key suppliers into supply chain security drills, thereby stress-testing and enhancing the network and data security capabilities of all institutions within the Group, and building a high-level cyber security workforce. The Bank conducts regular penetration testing to proactively identify security vulnerabilities, implement remediation measures and eliminate risks. For systems classified as cybersecurity level protection Grade III and above, the Bank engages qualified third-party institutions to conduct cybersecurity classified protection assessments, with assessment results rated as excellent. The Bank also conducts annual external assessments of mobile banking applications to ensure their resilience against cyberattacks. In addition, the Bank carries out security inspections of both domestic and overseas branches, and follows up on corrective actions to ensure timely remediation.

### **8. Emergency response plan**

The Bank is committed to building emergency management mechanisms on privacy and data security and keeps improving emergency response procedures of data security incident. The Bank has consolidated the institutional system including the *Measures for Personal Customer Information Protection*, the *Management Measures for Data Security*, and the *Contingency Plan for Data Security Incidents*, clarifying the division of responsibilities for data security risk monitoring and emergency management of data security incidents, standardising the grading of data security events, response and handling of key scenarios and events, the reporting procedures, and the main points for handling key event scenarios. The Bank has established emergency contact mechanisms and coordination mechanisms to improve the emergency handling procedure for data security incidents and enhance emergency management capability of data security incidents.

## **8.1 Proactive measures**

The Bank attaches great importance to the prevention of and monitoring over personal customer information protection, incorporates personal customer information protection incidents into the emergency management mechanism for data security incidents, refines the emergency plan and drill management of data security incidents, and continuously improves the emergency handling mechanisms of data security in various situations. All operations establish and improve emergency management mechanisms in accordance with the Bank's regulations on personal customer information protection emergency management and handling, as well as local regulatory requirements, industry management requirements, and actual work conditions. The Bank adds data security monitoring in daily public opinion monitoring, incorporates personal information protection label into the complaint management system and monitors data security incidents through media and complaint channels. The Bank regularly conducts data security emergency drills at the Head Office and at branch level, and promotes the orderly conduct at overseas operations, covering data security incidents such as data breaches and losses, effectively testing the operability of emergency plans and continuously improving the emergency response capacity for data security.

## **8.2 Reactive control**

In the event of data security incidents such as leakage, tampering, or loss of personal customer information, the Bank immediately takes effective response measures, controls the situation, removes potential risks and makes a report in accordance with regulations. After the data security incident, the relevant institution where the incident occurred will timely notify the affected personal customers of the situation in accordance with relevant provisions in the contract or agreement (except for those that are not notified as otherwise provided by laws and administrative regulations). Notifications can be made through email, letter, phone call, and push message, covering the information types, causes and possible harms caused by the leakage, tampering or loss of personal customer information that has or may occur, as well as the Bank's remedial measures, client loss reduction suggestions, emergency response contact information, etc.

In view of the fact that data security incidents are often intertwined or concurrent with cyber and information security incidents, information system production incidents, regulatory cases, business continuity incidents, reputation incidents, and major events of consumer rights protection, the Bank specifies the requirements and principles of coordinated handling in the Contingency Plan for Data Security Incidents to ensure that all parties work together and respond efficiently. The Bank explicitly requires that confirmation with data security management department at the same level shall be made immediately after the occurrence of data security incidents. The corresponding competent authority shall promptly initiate the emergency response, handle and report according to the hierarchy of the incidents, and take control measures from both business and technology perspectives, conduct in-depth analysis of the cause of the incident, and remedy in a timely manner, so as to effectively control the situation, ensure business continuity and prevent the expansion of negative effects.

## **(V) Third-party Privacy and Data Security Management**

### **1. Policies and standards**

The Bank continuously strengthens the security management on third parties in their handling of client information, privacy and data, formulates internal regulations such as the *Work Plan of IT Outsourcing (2023-2025)*, the *Management Measures for IT Outsourcing (2023 Version)* and the *Management Measures for Personal Customer Information Protection (2023 Version)* to clarify the requirements on the protection and management of personal customer information in third parties. The Bank issued the Regulations on the *Security Management of Third-Party Cooperation Data (2025 Version)*, embedding data security management requirements into the third-party cooperation management process mechanism. It stipulates that before cooperation, the data scope involved should be identified and reviewed to ensure that business adheres to the necessity principle and relevant agreement terms are signed; during cooperation, control should be implemented based on business scenarios to strengthen personnel training, behaviour management,

and supervision; and the cooperation party should be urged to fulfil the agreement requirements and delete the data in a timely manner after cooperation. The Bank strictly restricts the purposes and use of authorising third parties to handle client information, standardises the process of third-party data processing and improves the supervision and inspection mechanisms of third-party data processing, so as to effectively improve the security and compliance of third-party data processing and create a safer and more reliable financial service environment for clients.

## **2. Requirements for third-party data management**

### **2.1 Entrusted institutions**

The Bank requires third parties to clearly define data security responsibilities, limits the purpose and use of information collection, processing and retention by third parties, controls data scope, and supervises the third parties to take effective protective measures to ensure the security and confidentiality of client information. In the event of the Bank commissioning third parties to process personal customer information due to business needs, the Bank's regulations on commissioned institutions processing personal data and the limits of authority in this regard are as follows:

- Agreeing with the entrusted institutions on the purpose, period, processing methods, information types, protection measures, security and confidentiality requirements of the commission and rights and obligations of both parties;
- Following the principle of minimal necessity in providing data and authorising data access for third parties. The localised deployment of the system and data shall be preferably completed in the bank;
- Regularly organising supervision over and inspection on personal customer information processing activities carried out by the commissioned institutions;
- Requiring commissioned institutions to process personal customer information in strict accordance with the agreement and the processing shall not exceed the agreed purposes and methods;

- If the commissioning contract does not go into effect, is invalid, revoked or terminated, the Bank requires the commissioned institutions to return relevant personal customer information to the Bank and deletes and destroys the information instead of retaining it and takes it down from the relevant systems;
- Without the consent of the Bank, the commissioned institutions shall not re-commission other parties to process the Bank's personal customer information.

## **2.2 Third-party partners for products and services**

The Bank strictly regulates the product and service cooperation with the third parties, and clearly requires that:

- The Bank shall clarify the responsibilities and obligations of both parties for the protection of personal customer information in agreements or contracts, implement security control measures, and supervise third parties to strengthen information security management;
- Clients shall be fully informed when the Bank's Apps, mini programmes, WeChat official accounts direct them to third parties. Where the collection of personal customer information is involved, the party performing information collection shall ensure that there is a clear notification to clients that the products or services are provided by third parties. Before processing client information, clients shall be informed according to the law and consent shall be obtained from clients;
- In the case of providing de-identification information, the Bank requires the relevant third parties not to re-identify clients through technical means.

## **2.3 Information technology outsourcing and other third-party cooperation services**

For the services of IT outsourcing or third-party cooperation that involve personal information of the Bank's clients, the Bank carries out risk assessments before procurement, and conducts detailed due diligence on service providers to fully understand their risk prevention and control capabilities. The Bank clarifies the data security responsibilities in

agreements, keeps improving emergency management mechanisms, and implements cybersecurity and data security monitoring on service providers, and implements on-site inspection and tracks problem rectification, which covers all important outsourcing service providers. Meanwhile, all IT outsourcing service providers are required to conduct “security and confidentiality” training fully covered for all outsourced personnel involved in the services, so as to continually enhance the awareness of information security among outsourced personnel.

When the Bank commissions a third-party to process data in business outsourcing, the Bank controls the scope of commissioned data according to the “minimal necessity” principle, adopts de-sensitisation or encryption to share data in a secure and controllable environment. The Bank signs an agreement with the commissioned institution to clearly define the rights and responsibilities and agrees upon the purpose, period, processing methods, protection measures, and security and confidentiality requirements of the commission, as well as the data security responsibilities and obligations of the commissioned party. The third-party shall notify the clients and obtain their consents before processing the information in accordance with the law. In the *Management Measures for Data Security*, the Bank refines the regulations on data collection from personal information owners and external institutions, and access to third party ecosystems or external systems.

### **3. Supervision over and inspection on third-party data processing**

#### **3.1 Supervision and management mechanisms**

The Bank keeps improving the management system on third-party data and privacy security and strengthening the guarantee of security standards for data cooperation with third parties. The Bank has formulated the *Third-Party Cooperation Data Security Management Procedures*, clarifying the data security management requirements for data sharing within the group, business outsourcing and entrusting processing, and external data sharing. The Bank strengthens the compliance of the agreements for data cooperation with third parties, by formulating security example clauses for data processing activities

in third-party cooperation, guiding operations at all levels to comply with laws, regulations and regulatory requirements, and clarifying the responsibilities and obligations of partners in data cooperation security, to safeguard data owners' legitimate rights and interests and ensure compliance and security in the data processing process.

Before introducing third-party partners, the Bank implements strict privacy and data security access audit mechanisms, carries out comprehensive business impact assessment, so as to ensure the compliance of partners in terms of privacy and data security. At the same time, the Bank clearly defines the responsibilities and obligations of both parties in the protection of personal customer information through standardised agreements and contracts and implements strict security control measures. If the cooperative relationship has changed or terminated, the Bank requires the commissioned institution to return, delete and destroy the Bank's client personal information, instead of retaining, and turn off relevant systems, to protect client privacy and information security.

During the duration of the contract with third parties, the Bank will keep supervising the implementation of the commissioned parties' data security protection measures to ensure that the third-party service providers comply with the relevant provisions of the *Personal Information Protection Law of the People's Republic of China* and the *Data Security Law of the People's Republic of China*, fulfil their obligations of protecting user information and appropriate confidentiality/non-disclosure. The Bank urges third parties to maintain the effectiveness of system security, transaction risk control and information protection, to ensure that the purpose and method of personal information processing are legal, legitimate and necessary, and the protection measures are in line with the degree of risk. The Bank urges third parties to timely rectify problems identified and strengthen supervision and inspection on third parties on their obligations of personal customer information protection, so as to protect clients' right of personal information security through concrete actions.

The Bank requires tier-1 branches, CCB Learning Centre (Research Institute), operations directly under the Head Office, audit operations, overseas operations and domestic subsidiaries to implement the impact assessment and inspection on data security protection before conducting business outsourcing

and external data sharing, analyse data security risks and the impact on the rights and interests of data subjects in accordance with the purpose, nature and scope of data processing as well as the requirements of laws, regulations and codes of ethics, and assess the necessity and compliance of data outsourcing, the effectiveness of data security risks and preventive and control measures, so as to strengthen data security protection.

### **3.2 Data security and personal customer information protection inspection**

In 2025, the Bank systematically organised group-wide inspections on data security and personal customer information protection. The Bank conducted regular on-site inspections in areas with higher risks related to data security and personal customer information protection. In particular, the Bank included “third-party cooperation management” in the scope of inspection and review, covering both the compliance performance of third-party institutions in data security and personal customer information protection, and the Bank’s own standardisation of third-party data security management. The scope of inspection mainly includes:

(1) Whether the cooperation agreement specifies the cooperative institution’s responsibilities for data security protection and risk management (including data protection responsibility, confidentiality obligation, liability for breach of contract, contract termination and handling provisions in emergencies, etc.);

(2) Whether operations strictly control the behaviour and authority of the cooperative institutions, and take means such as encrypted transmission, security isolation, authority control, monitoring and alarm to prevent the risks of data abuse or leakage;

(3) Whether the Bank effectively supervises the performance of data security protection responsibilities by third-party cooperating institutions, and promptly takes corrective actions when any behaviour endangering the Bank’s data security is identified;

(4) Whether, upon termination of cooperation with third-party institutions, the Bank promptly supervises the deletion or destruction of Bank-related data obtained during the cooperation period.

Through these inspections on data security and personal customer information protection, the Bank further strengthens the supervision and review of third-party institutions' fulfilment of data security and privacy protection responsibilities, timely identifies non-compliance issues in third-party management, and promotes rectification measures accordingly, ensuring that data collection, processing, transmission, management and security controls during cooperation with third parties are standardised and effective.

### **3.3 Compliance inspection on third-party data security management**

During the cooperation with third parties, the Bank regularly carries out data security compliance inspections of third-party cooperation institutions to assess their compliance with data security and personal information protection requirements. The inspections cover data processing scenarios within the scope of the cooperation and are conducted through various forms, including on-site inspections and supplier self-assessments, to ensure the lawful and compliant use of the Bank's data by third parties.

The Bank has issued the *Regulations on the Security Management of Third-Party Cooperation Data*, stipulating that cooperative institutions must strengthen data security management of third-party personnel, urging third-party cooperation institutions to conduct data security education and sign data security commitment letters before outsourcing personnel take up their posts, taking strict management of outsourcing personnel's data usage rights and methods, and carrying out data security supervision and inspection of cooperative institutions in third-party cooperation. The business management departments supervise the inspection situation of cooperative institutions, and urge prompt rectification of identified issues or terminate cooperation if necessary. Meanwhile, the Bank actively carried out a comprehensive risk investigation of third-party cooperation data security, covering all third-party

cooperation scenarios involving data processing activities, benchmarking the requirements of the *Regulations on the Security Management of Third-Party Cooperation Data*, identifying weak links, clarifying control measures, and strengthening supervision of rectification progress.

In 2026, the Bank carried out a special inspection of data security in third-party cooperation and organised a comprehensive risk assessment across the Group covering key stages of third-party data cooperation. The review assessed the implementation of data security and compliance requirements before, during and after cooperation, including pre-cooperation due diligence and assessments, the standardisation and completeness of cooperation agreements and contracts, controls over third-party activities and access permissions during cooperation, and data retention following the termination of cooperation, ensuring the lawful and compliant use of the Bank's data by third parties.

#### **4. Management and supervision of customer data usage purposes**

In terms of managing customer data usage purposes, the Bank has established a comprehensive management system framework. The Bank strictly prohibits the leasing, sale or provision of customers' personal and privacy-related data to third parties for purposes other than completing transactions or delivering services. The Bank does not share customer information with financial partners, affiliates or business partners without the customer's authorisation.

##### **4.1 Fundamental principles**

The *Measures for Data Security Management* of the Bank clearly stipulate that the processing of personal information shall follow the principles of "explicit notification and authorised consent". Where personal information or data classified as sensitive or above is provided to external parties, the consent of the data subject must be obtained in accordance with applicable laws and regulations, unless otherwise provided by laws, administrative regulations or competent authorities. When entrusting third-party institutions to process data, the Bank clearly defines the conditions, scenarios and

methods for external data use and processing, controls the scope of entrusted data in accordance with the principle of “minimum necessity”, and adopts measures such as data desensitisation or encryption to safeguard data security while meeting business objectives.

#### **4.2 Ex-ante assessment**

The Bank conducts data security capability assessments and data security impact assessments before cooperation begins. Through contractual agreements, the Bank clearly specifies the purpose of data processing, data scope, processing methods, protection measures, processing period, respective data security responsibilities and obligations of both parties, personal information protection obligations of cooperating institutions, and requirements for data return or deletion. The Bank supervises third-party cooperating institutions to ensure that, without obtaining customer consent, they do not further entrust data processing to other parties, share data or personal information externally, process, train on or misappropriate data, or otherwise use data for benefits beyond those agreed under the contract or cooperation agreement. Where entrusted processing of personal information is involved, the Bank imposes more stringent supervision to ensure that personal information is processed strictly in accordance with the agreed purposes and methods. The transmission of sensitive personal data to third-party institutions must be conducted securely to prevent data misuse and leakage risks.

The *Measures for the Management of Personal Customer Information Protection* stipulate that, prior to cooperation with third parties, the Bank follows the principle of “whoever introduces is responsible, whoever connects is responsible, and whoever benefited is responsible”. Relevant institutions are required to conduct strict admission reviews and perform personal customer information protection impact assessments before cooperation. These assessments cover business risks, impacts on customer rights and interests, and the effectiveness of system security, transaction risk controls and information protection measures, ensuring that the purpose and method of personal information processing are lawful, legitimate and necessary, and that protection measures are lawful, effective and commensurate with the

level of risk.

### **4.3 Process control**

When providing customer information to third parties, the Bank informs customers of the recipient's identity, contact information, processing purpose, processing method and categories of information involved, and obtains the customer's separate consent. During cooperation with third parties, the Bank strengthens supervision over cooperation activities and has established reporting mechanisms for data security incidents involving service providers and third-party cooperating institutions, ensuring prompt response and timely handling when a data security incident related to the Bank's data occurs or may occur.

### **4.4 Response mechanism**

In the event of unlawful use of data by a cooperating institution, the Bank will immediately require the third party to cease the unlawful activity, suspend the provision of data, terminate or suspend cooperation, reassess the necessity of the cooperation, and provide affected customers with necessary support and explanations in a timely manner. The *Regulations on the Security Management of Third-Party Cooperation Data* clearly stipulate that third-party cooperating institutions that fail to fulfil their data security obligations, or fail to do so adequately, will be dealt with in accordance with contractual agreements or data security undertakings. Depending on the severity of the incident, the Bank may terminate the contract and pursue compensation in accordance with applicable laws or contractual provisions. Where violations of national data security laws and regulations occur, or where data security incidents are caused, the Bank will report the matter to the relevant competent authorities and pursue legal liability against the institution and responsible personnel in accordance with laws and regulations.

## **(VI) Privacy and Data Security Related Training**

The Bank continues to strengthen training and awareness programmes on information security, personal data protection, and trade secrets. The Bank has established a multidimensional, professional and tailored training system covering all employees, dispatched workers and third-party personnel such as

outsourced staff. Training topics include fundamental knowledge and professional capability development in areas such as personal information protection and data security. Leveraging online learning platforms, the corporate portal and other channels, the Bank continuously expands training outreach, effectively enhancing the professional capabilities and risk awareness of all relevant personnel in the field of data security, and ensuring the effective implementation of privacy and data security protection measures.

The Bank has launched a “Data Security Awareness Year” campaign targeting all employees of the Group, professional staff, and third-party personnel, with the aim of enhancing security awareness, standardising daily behaviours, and guiding work practices. The campaign adopts multiple formats, including online learning, case-based warning education, and interactive quizzes. Leveraging the “CCB Learning” platform, the Bank has established a dedicated learning section and designed differentiated training courses for various groups, such as newly recruited employees. The Bank has also compiled and issued a collection of best practices and warning cases on data security and personal customer information protection, continuously enhancing employees’ awareness in these areas and preventing potential risks. As of the end of June 2026, the total number of visits in this section had exceeded 400 thousand.

## **1. Training for all employees**

### **1.1 Regular training on data security and personal customer information protection**

The Bank carries out regular training on data security and personal customer information protection for all employees. The training covers laws and regulations, regulatory policies, and interpretations of internal rules and systems, as well as security control requirements across each stage of the data lifecycle. Head Office and branch-level data management functions, business departments and outlets carry out data security training according to their actual work. Through data security mini-classes, case-based warning education, and knowledge quizzes in the form of online learning and offline group study, the Bank integrates the concept of data security into daily work. In the first half of

2026, the Bank's Head Office and branches have conducted a total of 810 training sessions on data security and personal customer information protection, with a total of 338 thousand attendances.

In addition, the Bank organised group-wide initiatives including R&D security technical training, security CTF (Capture The Flag), and the "Jinke Cup" cybersecurity offensive and defensive technical competition, using competitions to drive practice and learning and enhancing employees' cybersecurity skills.

### **1.2 Trade secret protection training**

The Bank regularly conducts trainings on trade secret protection, including the introduction of relevant laws and regulations and the Bank's management requirements on trade secret protection. The training courses and publicity materials are designed for all employees to improve their capabilities for protecting the Bank's trade secrets, client information and privacy data. In 2025, approximately 210 thousand attendances across the Bank.

### **1.3 Training for third-party employees including workers dispatched from labour leasing companies and outsourcing**

The Bank continues to expand the categories of personnel covered by trainings related to privacy and data security protection. On the basis that all regular employees are covered, the Bank carries out special privacy and data security trainings encompassing relevant work scenarios for workers dispatched from labour leasing companies, outsourced personnel<sup>11</sup>, and other third-party personnel, strengthens the awareness of relevant personnel on data privacy protection, implements supervision over risk procedure, and ensures the full coverage of all personnel. Data security and personal information protection training requirements are clarified for outsourced service providers through agreements or contracts, and training for outsourced service providers is organised by relevant organisations within the Bank in accordance with the principle of "whoever uses is responsible".

In the first half of 2026, the Head Office and branches of the Bank have

---

<sup>11</sup> Training for outsourced personnel is delivered by outsourcing service providers.

conducted 40 trainings for workers dispatched from labour leasing companies on personal customer information protection and data security, with a total of 204 attendances. The trainings involve personal customer information protection, data security, business compliance and other relevant regulations and management requirements. 359 trainings were conducted for outsourced personnel and other third-party personnel with a total of 9,431 attendances. The trainings involve data security management system and compliance management requirements, terminal security management systems and requirements, personal information protection, confidentiality education, cybersecurity, code of conduct, etc.

## **2. Training for specialised personnel**

The Bank continuously improves the data security training system. Each year, the Bank organises centralised training programmes for data security management professionals, covering basic knowledge of data security, data classification and grading, data security assessment, and data security emergency management requirements. The Bank also organises key personnel to complete online specialised training on data security and personal customer information protection. The Bank incorporates data security training into the data talent development curriculum and integrates basic data security knowledge into various training programmes. The training has covered business lines including Personal Finance, Corporate Finance, Risk Management, and Tech and Channel operations, helping enhance employees' compliance awareness in data security and personal customer information protection. In the first half of 2026, the Head Office and branches have conducted 460 training sessions for data security and personal customer information protection professionals, with a total of 19 thousand attendances.

## **(VII) Privacy and Data Security Audit**

The Bank establishes a privacy and data security audit and supervision mechanism to timely review progress in relevant areas, and implements regular tracking assessments and dynamic risk identification to ensure effective implementation of systems, measures, and training related to privacy and data security. This mechanism supports continuous improvement in the quality and

effectiveness of privacy and data security management. In audit activities, the Bank focuses on core areas including cyber security, personal information protection, and data security. Tests are conducted on cyber security architecture, resilience against external cyberattacks, technical capabilities of security components, cyber security operations, and lifecycle management of personal information within the Bank's systems. Through an audit-driven supervision and rectification closed-loop mechanism, the Bank continuously strengthens the foundation of privacy and data security controls and comprehensively enhances the systematic prevention and control capabilities in this area.

### **1. External audit of information systems**

The Bank's external auditors conduct annual audits of key information systems covering all operations across the Bank. The audit scope includes IT governance, system development and deployment management, system operation and maintenance management, and system security access management. Tests are conducted on system development, operations and maintenance, security management, and automated controls, with a focus on system access security, business continuity and other processes. In addition, the audit pays close attention to key areas such as data security and cybersecurity.

### **2. Information security assurance**

The Bank engages a third-party accounting firm every year to perform assurance over the IT services provided by the Head Office to overseas operations. In 2025, the ISAE 3402 (International Standard on Assurance Engagements 3402) assurance report on controls at a service organisation, the System and Organisation Controls (SOC 2) Report, the IT-related control assessment report on personal information protection, and the data centre threat and vulnerability assessment report were issued. The Bank is also progressing assurance engagements for 2026 to ensure the continuous and effective implementation of control.

### **3. Grade-based cybersecurity protection evaluation and cryptography application security assessment**

Under the Multi-level Protection Scheme (MLPS) for the financial industry and in accordance with a series of standards for information system commercial cryptography application, the Bank engages qualified third-party assessment institutions to evaluate filed information systems at Level 3 and above every year. The Bank's core business processing system and other systems have passed the 2025 MLPS compliance assessment and cryptography application security assessment.

#### **4. Information security special audit**

The Bank's audit department conducts annual special audits on data and information security, achieving full IT audit coverage of the Head Office, branches, and CCB FinTech within a three-year cycle. In the first half of 2026, the Bank conducted audits on critical data security and credit information business management, as well as cyber security audits, selecting samples from certain Head Office departments, directly affiliated institutions, and CCB FinTech. The audit on critical data security and credit information business management covered areas such as the identification of critical data in the business fields of the PBoC, information system cybersecurity classification and log retention periods, and compliance in external data provision. The cyber security audit covered aspects including the Group's cyber security governance framework, technical architecture and platform support, supply chain security, and cyber security operational risks.

### **(VIII) Data and Information Security Management Certification**

The Bank continues to strengthen the data and information security management systems, works to improve the overall information security and privacy protection capabilities, and stays committed to promoting internationally recognised information security management system certification. The Bank has obtained ISO 27001 Information Security Management System certification. The certification covers the operation and maintenance of the Head Office's information systems and the CCB cloud platforms and cloud services, as well as the planning, development and technical operation management of infrastructure across the Bank. The Bank has established a unified enterprise-

level management framework, applications at branches have largely migrated to CCB cloud, and ISO 27001 certification has covered more than 98% of the business-related systems. The Head Office of the Bank has obtained a SOC 2 assurance report of the security, availability, processing integrity and confidentiality of the Head Office's technology services.

## IV Access to Finance

The Bank thoroughly understands and earnestly implements the political and people-centredness nature of finance, deepens innovation in financial products and service models, actively expands the coverage of financial services, and continuously enhances the accessibility of financial services. Focusing on key areas such as serving the real economy and supporting corporate relief efforts, the Bank explores tailored, differentiated and specialised financial service solutions based on local conditions, providing high-quality financial resources to various market entities and the general public. As of the end of the first quarter of 2026, the Bank's balance of inclusive loans to micro and small enterprises had reached RMB4.09 trillion, agricultural-related loans exceeded RMB3.96 trillion, and corporate housing leasing loans reached RMB366.275 billion, effectively supporting and meeting the diversified financial needs of different client groups.

### (I) Management System

The Related Party Transaction, Social Responsibility and Consumer Protection Committee of the Board of Directors of the Bank is responsible for overseeing and guiding the Management in promoting work related to inclusive finance and rural revitalisation finance, among others. In the first half of 2026, the Committee listened to the *Report on the Progress of Inclusive Finance Work* and the *Report on the Progress of County and Rural Financial Business*, and provided guidance to management on further strengthening product optimisation and service innovation, enhancing risk management and control capabilities in inclusive finance and agriculture-related finance, and effectively improving the Bank's overall capacity in inclusive finance and rural revitalisation finance.

The Inclusive Finance Development Committee of the Management of the Bank is responsible for coordinating the development of inclusive finance business across the Bank, studying and implementing the policies and plans of the CPC Central Committee, the State Council and regulatory agencies on inclusive finance, and the requirements of the Party committee of the Head Office of the Bank, the Board of Directors and President's Office Meetings for

promoting the development of inclusive finance in the Bank, and reviewing major operation and management matters within the committee's authority.

The Inclusive Finance Department of the Bank is responsible for leading inclusive finance business, and coordinating the Bank's inclusive finance operations as well as the comprehensive management and service of micro and small enterprises. In the first half of 2026, the Bank focused on the main theme of high-quality development, continuously enhanced the effectiveness of inclusive financial services in supporting the real economy, and made every effort to advance the development of inclusive finance as a key priority.

The Rural Revitalisation Finance Department of the Bank is responsible for leading financial services for rural revitalisation, building a unified brand and comprehensive service system for rural revitalisation finance across the Bank, and coordinating the expansion and performance evaluation of county-level business. In the first half of 2026, the Bank thoroughly implemented the spirit of the Central Rural Work Conference and the No. 1 Central Document, actively promoted coordinated urban-rural development and comprehensive rural revitalisation, and advanced the high-quality development of county and rural financial services.

## **(II) Inclusive Finance Services**

The Bank focuses on targeted client groups of inclusive finance and takes multiple measures to enhance the quality and efficiency of financial services. Targeting the practical needs of micro and small business owners, self-employed individuals and other inclusive client groups, the Bank continues to increase financial resource support and expand the breadth and depth of financial services. Focusing on the obstacles to accessing funding of micro and small enterprises, the Bank promotes innovation in inclusive finance operating models, improves the "digital + manual" risk control framework, and strengthens credit supply and integrated services. These efforts effectively support the real economy and contribute to the achievement of UN SDG 8.10, which aims to enhance the accessibility of financial services.

### **1. Expanding the coverage of inclusive financial services**

The Bank actively promotes the in-depth development of inclusive finance

services, and continuously improves the quality of services for various inclusive client groups. As of the end of the first quarter of 2026, the balance of the Bank's inclusive small and micro enterprises loans had been RMB4.09 trillion, with an increase of RMB256.061 billion from the end of the previous year; the number of loan clients was 3.82 million thousand, with an increase of 135 thousand from the end of the previous year.

In underserved regions of financial services, such as Xizang, Qinghai, Ningxia, Gansu and Xinjiang, the Bank continuously carries out extensive inclusive finance business. As of the end of the first quarter of 2026, the Bank had provided a total of 73 thousand local inclusive clients with loan support of more than RMB37.5 billion during the year, supporting to alleviate the financing difficulties of small and micro enterprises.

## **2. Deeply integrating online and offline services**

The Bank continues to enhance the inclusive finance service system. Based on the differentiation characteristics and diversified demands of inclusive client groups, the Bank constantly optimises digital service functions, and innovatively expands more inclusive finance service scenarios. The Bank improves the functions of online service platforms, enriches service contents, and advances the development of characteristic outlets, building a multi-tiered service network with extensive coverage, striving to enhance service quality.

Targeting the diversified demands of inclusive finance client groups such as small and micro enterprises, self-employed individuals, agriculture-related clients, and sci-tech innovation groups, the Bank works to build a comprehensive digital service system based on "CCB Huidongni" integrated eco-service platform. The platform integrates financial services including credit financing, account settlement, investment and wealth management, merchant services, and e-CNY, which can be handled both online and via mobile terminals. Also, the platform introduces non-financial service scenarios such as financial management, express delivery, logistics and business travel, providing one-stop operation and management solutions. As of the end of the first quarter of 2026, the "CCB Huidongni" App had accumulated 563 million visits and 48,402.6 thousand downloads, serving 16,125 thousand corporate clients, with

an increase of 385.1 thousand clients over the previous year.

In terms of offline service network building, the Bank continues to enhance the construction of inclusive finance service channels. As of the end of the first quarter of 2026, about 14 thousand outlets of the Bank had provided inclusive finance professional services, with over 26 thousand inclusive finance specialists designated, establishing a specialised and efficient offline inclusive finance service network with extensive coverage.

### **3. Innovating multi-dimensional data application**

The Bank continues to strengthen the innovation of digital inclusive finance models and constantly expands the scope of data applications. Focusing on scenarios such as client marketing, application access, quota calculation, credit management, early warning monitoring, collection and disposal, loan renewal management, and business operations, the Bank has developed hundreds of multivariate data models. By integrating small and micro enterprise data of fund settlement, transaction flow, and investment management with external business, tax, and credit data, the Bank comprehensively analyses the creditworthiness information of small and micro enterprises, forming an evaluation model tailored to their characteristics, which addresses financing challenges caused by irregular financial statements and information asymmetry. This effort contributes to achieving the UN SDG 8.10 goal of enhancing financial service accessibility.

To address the “short-term, small-scale, frequent, urgent, and dispersed” needs of small and micro enterprises, the Bank extracts key features and credit evaluation factors to build an SME scorecard model. This model allows for online evaluation of repayment ability and willingness, as well as standardised and automated approval processes, significantly improving service efficiency.

### **4. Expanding the supply of sustainable products**

#### **4.1 Development of inclusive product system**

The Bank continues to improve the product and service system, and develops a new digital inclusive finance model featuring the integration of online and offline channels. Online intelligent capabilities empower offline decision-making and enhance business processing efficiency, while offline verification

feeds back into online modelling to improve the quality of business development. Through the complementary advantages of online and offline channels, the Bank has formed a closed-loop and iterative intelligent service ecosystem. The Bank flexibly combines four key product elements—credit limit, tenor, interest rate and guarantee structure—to provide inclusive financial products and services with faster matching, broader coverage and stronger risk control.

#### **4.2 Scenario-based inclusive financial solutions for inclusive client segments**

The Bank systematically embeds banking products and services into various scenarios aligned with clients' business and operational needs. Targeting micro and small enterprises, self-employed individuals, agriculture-related clients, supply chain upstream and downstream clients, and clients in specialised scenarios, the Bank implements differentiated needs assessment and refined service design, to develop tailored financial service solutions aligned with their business characteristics and risk preferences. For regions with relatively limited financial services or groups that are difficult to reach through traditional channels, the Bank conducts in-depth assessments from multiple dimensions, including client characteristics, key financing pain points, application scenarios, and repayment capacity. Through scenario-based analysis, the Bank develops precise client profiling, formulates differentiated financial solutions and tailored product portfolios, further expanding the reach and effectiveness of financial services.

##### **Farmers and agricultural household clients**

Individual business operators primarily composed of farmers are generally characterised by small and dispersed operating scales, as well as financing needs closely linked to agricultural seasons. Leveraging the strengths in financial technology, the Bank has developed the “Yunong Quick Loan” product package with an online-dominant process, enabling farmers to submit self-service applications, automatic model-based approval, and fully online disbursement and repayment. The Bank has also developed the “Yunong Loan” product package with a predominantly offline process, to meet the credit needs of large-scale agricultural producers engaged in diversified agricultural and

rural business activities. As of the end of the first quarter of 2026, the outstanding balance of “Yunong Loans” (including “Yunong Quick Loan” and “Yunong Loan”) had reached RMB386.89 billion, representing an increase of more than 12% compared with the beginning of 2026.

### **Agricultural market operators**

Operators in agricultural wholesale and retail markets are generally characterised by small but frequent transaction volumes, significant capital tied up in stall rentals, and limited digital business management capabilities. As a result, they often face challenges such as limited access to financing, cumbersome payment collection and reconciliation processes, and a lack of scenario-based financial services. To address these challenges, the Bank has developed the “Yunong Market” integrated service platform, which provides a range of comprehensive services, including inventory management, client relationship management and transaction order processing, helping merchants improve their digital business capabilities. The Bank also embeds financial services into high-frequency operating scenarios such as stall leasing, utility payments and transaction processing. Based on merchants’ actual business conditions, the Bank provides tailored financing support through flagship products such as “Yunong Quick Loan” and “Quick Loan for Small and Micro Businesses”, effectively addressing challenges including insufficient working capital and rental payment pressures.

### **Micro and small enterprises and self-employed businesses**

To address the longstanding financing challenges faced by small and micro enterprises, as well as individual businesses, under traditional credit models, the Bank has introduced a new digital inclusive finance model represented by “Quick Loan for Small and Micro Businesses”. Leveraging data as a key production factor and technology as the core driver, the Bank has restructured the credit assessment framework for small and micro enterprises, and continuously optimised flagship products such as “unsecured quick loans”, “secured quick loans”, and “Shanyingdai”. Powered by technologies such as the Internet and big data, these products integrate internal and external information sources to conduct comprehensive assessments of the operating

capability and risk profile of small and micro enterprises and business owners. Eligible clients are then provided with financing services, effectively alleviating the challenges of difficult and costly financing for small and micro enterprises. As of the end of the first quarter of 2026, the outstanding balance of loans under new-model products such as “Quick Loan for Small and Micro Businesses” had reached RMB3.35 trillion, serving more than 6.3 million clients in total.

The Bank also continues to strengthen support for sectors related to social wellbeing and economic development through supply chain finance. Taking core enterprises as the entry point and extending along the transaction networks of industrial and supply chains, the Bank develops digital supply chain financial products that serve the entire value chain, cover all business scenarios and operate fully online, thereby serving micro, small and medium-sized enterprises at various stages of the supply chain. As of the end of the first quarter of 2026, the outstanding balance of the Bank’s digital supply chain financing had reached RMB798.352 billion.

### **Technology-oriented small and micro enterprises**

Technology-oriented small and micro enterprises are typically characterised by light assets, high investment intensity, strong growth potential and significant business volatility, which often results in financing challenges under traditional lending models, including limited access to credit, insufficient credit limits and cumbersome application procedures. To address these challenges, the Bank has launched dedicated credit products for technology-oriented small and micro enterprises. These products establish a technology-focused credit evaluation framework by incorporating multidimensional data beyond conventional operating information. The framework quantitatively assesses factors such as research and development capabilities, technological talent, industry positioning and market recognition, enabling more accurate credit assessment and financing support. By reducing reliance on collateral and traditional operating track records, these products effectively address the financing constraints faced by technology-oriented small and micro enterprises, allowing innovation-driven businesses to focus on technological breakthroughs and product development. As of the end of the first quarter of 2026, the outstanding balance of specialised credit products for small and micro

technology enterprises, such as “Shanxindai” and “Shankedai”, exceeded RMB200 billion, covering more than 60 thousand borrowing customers.

### **Elderly customers**

The Bank has actively implemented the national policy on accelerating the development of a multi-tiered and multi-pillar pension insurance system, and has positioned pension finance as a key priority in “14th Five-Year Plan” and “15th Five-Year Plan” strategic framework. The Bank was among the first batch of institutions to launch personal pension business, and has promoted improvements in the application and usage experience of social security cards, providing integrated “social security + finance + livelihood services” for customers. As of the end of the first quarter of 2026, the Bank had served over 320 million pension customers aged 50 and above. The Bank has launched 11 personal pension wealth management products, 219 pension-targeted funds and Y-share index funds, and 26 personal pension insurance products from 10 insurance companies. The Bank has also developed a dedicated pension finance section within the mobile banking platform, with over 17 million cumulative users, and introduced a “five-step pension planning service” with nearly 50 thousand users.

### **Student customers**

In accordance with the requirements of the Ministry of Education, the Ministry of Finance, the People’s Bank of China and the National Financial Regulatory Administration, the Bank actively advances the national student loan programme, leveraging financial services to support students from financially disadvantaged families in completing their education and alleviating the financial burden on students and their families. As of the end of the first quarter of 2026, the outstanding balance of the Bank’s national student loans amounted to RMB8.90 million.

The Bank has launched student-exclusive financial service solutions such as “CCB Student Benefits”, under which university students are exempt from fees including card issuance fees and SMS service fees, effectively reducing their usage costs. Meanwhile, leveraging campus scenarios, the Bank integrates financial services into the full range of campus life, including tuition

payment, daily consumption, and knowledge learning. In addition to meeting basic financial needs, the Bank strengthens financial literacy promotion and risk education, accompanying students in their healthy development. As of the end of the first quarter of 2026, “CCB Student Benefits” had accumulated over 14.4746 million signed-up customers.

The Bank addresses various pain points faced by student customers across multiple stages, including enrolment procedures, on-campus consumption and payments, departure and refund processes, and alumni services. Leveraging the “CCB Smart Campus Application” integrated education platform, the Bank has developed a comprehensive campus service solution covering the entire student lifecycle from pre-enrolment and on-campus study to post-graduation engagement. Before enrolment, new students can complete information registration, preparation for admission, bank card applications and tuition payments through the platform’s smart orientation function, eliminating the need for multiple offline procedures. During their studies, students can access a wide range of campus services, including cafeteria and campus store payments, utility bill settlement, online maintenance requests and lost-and-found services, as well as academic and social functions such as timetable enquiries, grade enquiries and student society activities. Prior to graduation, students can process refund disbursements through the platform, while after graduation they can continue to access alumni directories, alumni donation services and other functions, maintaining connections with their alma mater. As of the end of the first quarter of 2026, the “CCB Smart Campus Application” platform had covered all 31 provinces and municipalities across China, with cumulative access to 980 higher education institutions and 46.2 thousand K12 schools, serving more than 28.07 million students, teachers and parents.

### **New employment forms practitioners and migrant workers**

New employment forms practitioners (such as logistics and delivery personnel including on-demand couriers and express delivery workers, as well as ride-hailing drivers and truck drivers) and migrant workers are generally characterised by flexible employment arrangements, relatively high income volatility, and limited credit history. As a result, they face financial service

challenges including difficulty in accessing credit, insufficient insurance coverage, and a lack of tailored financial products.

The Bank has launched the “Driver Care Card”, embedding supporting services into the user journey of the “DiDi Driver Platform”. Ride-hailing drivers can access scenario-based financial services through a single mobile device, including “dedicated accounts”, “cross-platform billing”, “platform commission exemption vouchers”, and “driver benefits packages”. By automatically consolidating income and expenditure flows across multiple platforms, the “Driver Care Card” helps ride-hailing drivers eliminate the burden of reconciling accounts, while also providing exclusive benefits such as compensation for non-passenger trips. As of the end of the first quarter of 2026, the service had reached 92.1 thousand customers, contributing to a virtuous cycle of “employment stability – income growth – consumption stimulation”.

The Bank has developed a social insurance “smart payment” service, providing tax authorities and the public with an integrated platform covering enquiry, payment, invoice printing, reconciliation and fund allocation. The service features “multiple payment channels, multiple payment methods, multiple insurance categories, 24/7 availability, full scenario support and comprehensive information coverage”, enabling convenient online and offline social insurance payment services for new employment forms practitioners. As of the end of the first quarter of 2026, a total of 27.9825 million social security contribution transactions were processed for urban and rural residents and flexible employment personnel, with a total payment amount of RMB64.864 billion.

### **(III) Supporting Rural Revitalisation**

The Bank provides financial support for rural revitalisation, deepens cooperation with local governments, agricultural enterprises, among others, values technological empowerment, and expedites the building of financial scenario platforms in rural areas. The Bank focuses on the critical areas, key regions and core client groups involved in rural revitalisation, and comprehensively meets the diversified and multi-tiered demands of agriculture-related clients for financial services through innovative financial products and

service models. To address the challenges of limited financial resources in rural and county areas, as well as issues such as poor creditworthiness and difficulty in evaluation for agriculture-related entities, the Bank leverages the advantages in channels and technology, innovating agricultural service models and utilising financial technology and big data to create innovative credit products. These efforts effectively solve the challenges related to credit evaluation for rural entities, enhance service convenience, reduce financial risks, and continuously improve the coverage and accessibility of services in areas facing a shortage of financial services. Our initiatives contribute to achieving the United Nations SDG 8.10, which aims to enhance the accessibility of financial services.

### **1. Building agricultural related financial service system**

The Bank improves the agriculture-related financial service model that covers all scenarios, client groups and industrial chains, focusing on the “Yunong Market” business cluster, and the seed industry chain, etc., to create an agriculture-related “circle-chain-cluster” service model, and to assist the high quality development of agricultural industry. As of the end of the first quarter of 2026, the Bank’s outstanding agriculture related loans had been RMB3.96 trillion, with an increase of RMB250.8 billion, and a growth rate of 6.77%, compared with the end of 2025.

### **2. Innovating agriculture-related credit products**

For individual agricultural operators primarily composed of farmers, the Bank has innovatively launched the online “Yunong Quick Loan” product package and the offline “Yunong Loan” product package. By integrating multi-dimensional data such as farmers’ credit information, production and operation data, and agricultural insurance information, the Bank promotes the application of three key models, namely enterprise-level information profiling, high quality direct connection with external data, and offline “Yunong Loan”, effectively enhancing the availability of credit in rural areas. As of the end of the first quarter of 2026, the balance of “Yunong Loans” had reached RMB386.89 billion, with a growth rate of more than 12% from the beginning of 2026. For agricultural-related enterprises and other organisations, the Bank has launched innovative products under the “Rural Revitalisation Loan” portfolio, including “Facility

Agriculture Loan” and “Co-operative Quick Loan”, precisely meeting the special financing demands for facility agriculture construction, cooperative operations and other specialised scenarios. The Bank has thereby built a comprehensive credit service system covering all types of agricultural-related business entities.

## **(IV) Promoting New Models of Housing Finance Services**

### **1. Continuous optimisation of housing rental credit services**

The Bank develops corporate housing leasing loan business in a prudent manner in accordance with regulatory requirements and market demand, and has established a housing rental financial service system that covers diverse entities and spans the entire life cycle. Based on the characteristics of the housing rental industry, the Bank prioritises support for market-oriented long-term rental housing and government-subsidised rental housing projects. By adopting differentiated risk control measures, the Bank provides strong financing support for the development of the housing rental market. As of the end of the first quarter of 2026, the outstanding corporate housing rental loans had amounted to RMB366.275 billion, of which loans supporting affordable rental housing amounted to RMB162.768 billion.

### **2. Housing rental fund**

The Bank is actively engaged in the housing rental fund business. As of the end of the first quarter of 2026, CCB Housing Rental Fund had signed 35 projects located in Beijing, Shanghai, Chengdu and other cities, with a total asset size of RMB19.958 billion and a fund contribution of RMB10.216 billion, which can provide the market with about 36 thousand long term rental flats. 11 sub-funds were jointly invested and set up with market-oriented entities, with a total fund-raising scale of RMB2.605 billion.

## **(V) Innovation in Diversified Cooperation Service Channels**

The Bank continues to strengthen the diversified cooperation service system, innovatively expands financial service channels and application scenarios, and conducts in-depth analysis of the practical needs of underserved

regions and customers. The Bank engages in extensive cooperation with various commercial channels and institutions to launch a series of tailored financial products and services with strong adaptability and broad coverage, jointly building a widely accessible and efficient financial service network. At the same time, the Bank adheres to technology empowerment and resource sharing, and strengthens the development of an integrated rural revitalisation service platform, providing rural customers with diversified services including basic financial services, daily livelihood payments, and social security and medical insurance services, thereby effectively meeting the diversified financial and non-financial needs of various customer groups.

### **1. Co-building of service channels in rural areas**

Upholding the original aspiration of serving the people through finance, the Bank deeply practises the service philosophy of “getting closer to rural areas and farmers”, gives full play to the strengths in fintech and inclusive finance services, and pursues an innovative pattern of financial services for rural revitalisation. Through the development of the “Yunongtong” digital service platform, the Bank has continuously promoted the downward shift of financial service focus and steadily expanded coverage of county-level and rural services, thereby improving the quality and efficiency of rural financial services.

**Innovate online business channels and integrate social media platforms.** Leveraging the strengths in financial technology, the Bank has developed the “Yunongtong” App to provide rural customers with one-stop services, including online credit, smart village governance, policy communication, and financial literacy promotion. The App also offers a dedicated shelf of agricultural loan products, enabling users to complete functions such as credit limit estimation, loan application, fund utilisation and repayment, thereby effectively expanding access to financial services. At the same time, the Bank has continued to enhance the connectivity between the “Yunongtong” App and the WeChat ecosystem through digital means, expanding its outreach to provide services such as appointment-based account opening, lending and bill payment for rural customers. By leveraging the social media platform, the Bank further extends the reach of the financial services. As of the end of the first quarter of 2026, the “Yunongtong” online platform had

over 32.4 million users, and agricultural loans cumulatively disbursed via the App exceeded RMB545.7 billion.

**Expand offline service channels and co-build multi-scenario partnerships.** The Bank has continued to optimise the layout of “Yunongtong” service stations and enhance scenario-based functionalities, and has strengthened cooperation with village committees, YiNong Information Society service sites and supply and marketing cooperatives, among others, to build a widely covered rural financial service network. “Yunongtong” service points are equipped with modern devices such as intelligent POS terminals and smart agricultural assistance terminals, enabling rural residents to conveniently access basic financial services such as agricultural cash withdrawal and remittance, as well as public services including social security, medical insurance and utility payments, thereby meeting diversified financial and non-financial service needs in rural areas. As of the end of the first quarter of 2026, the “Yunongtong” service station network had cumulatively served over 76.87 million rural households, and processed more than 39.52 million transactions in the reporting quarter. Cooperation with various stakeholders is set out as follows:

- Village committees: The Bank has built approximately 72 thousand “Yunongtong” service sites in cooperation with village Party organisations and village committees, providing rural clients with services such as utility payments and governance services.

- YiNong Information Society: YiNong Information Society refers to village-level information service sites established by the Ministry of Agriculture and Rural Affairs as part of the Information Access Project. The Bank has built 3,959 “Yunongtong” service sites in cooperation with YiNong Information Society to enrich daily information services available to rural clients and expand the reach of rural financial services.

- Village health clinic: The Bank has built 4,459 “Yunongtong” service sites in cooperation with village health clinics to provide more comprehensive medical insurance, social security, and financial service support to rural clients.

- Chain supermarket: The Bank has cooperated with supermarket chains

to integrate “Yunongtong” into 4,808 chain supermarket outlets.

- Supply and marketing cooperatives: The Bank has cooperated with supply and marketing cooperatives to integrate “Yunongtong” service stations into 3,204 supply and marketing cooperatives.

- Technology companies: The Bank empowers rural social security services through “Yunongtong”, continuously enriching social security payment scenarios. Through in-depth cooperation with Jinbaoxin Social Security Card Technology Co., Ltd., the Bank continuously enhances the accessibility of social security services in rural areas.

## **2. Financial service platform for ecological scenarios of agricultural industry chain**

The Bank has improved and implemented the construction of the “Yunong Industry” platform. Through the coordinated linkage between the Head Office and branches, the Bank has deeply integrated into the financial services for ecological scenarios of the agricultural industry chain, and provided all-round financial services covering production, operation, digital management and supervision for clients in the breeding and planting industries and industry associations. The Bank provides digital services such as agricultural product procurement, warehousing, order management, and sales for core enterprises in agricultural industry chain across various regions, and provides online service support such as agricultural material procurement, agricultural technology consultation, agricultural product sales, and land transfer for farmers. Meanwhile, the Bank has built a digital window for market supervision and policy transmission for local governments, and comprehensively promoted the online, intelligent, visual and inclusive development of special agricultural industries. As of the end of the first quarter of 2026, the platform had a total of 218 core enterprises, 515 chain enterprises, over 80 thousand registered farmers, and a cumulative transaction amount of RMB2.9 billion.

## **3. The digital platform for market participants**

Based on the needs of the client groups of agricultural wholesale and retail markets across the country, the Bank strives to create the “Yunong Market” service brand, providing integrated financial service solutions covering credit

and settlement for market operators, merchants, and upstream and downstream business entities. By empowering the upgrading of National Top 100 markets, designated markets of the Ministry of Agriculture and Rural Affairs, special agricultural product markets, and specialised markets in county and rural areas, the Bank makes financing easier and less costly for market operators and merchants. The “Yunong Market” comprehensive service platform has been launched, integrating core functions such as market management, stall services, operational management, data analysis, and visual display, and fully empowering the digital transformation and upgrading of market participants.

#### **4. The comprehensive service platform for farmers’ cooperatives**

The Bank further explores the innovative models of financial services for farmers’ cooperatives, establishing the “Yunong Cooperation” comprehensive service platform to help farmers’ cooperatives enhance operation and management efficiency with information technology. The platform has introduced “Quick Loan for Cooperatives”, an innovative credit product exclusive to farmers’ cooperatives, and integrated diverse services such as payment, settlement and agricultural product sales, to give full play to the role of farmers’ cooperatives in connecting and leading farmers. With services for specialised farmers’ cooperatives at the core, the “Yunong Cooperation” comprehensive service platform provides comprehensive financial service solutions covering credit support, fund settlement, and digital operations for relevant agriculture-related entities, effectively promoting the innovation and development of agricultural financial services. As of the end of the first quarter of 2026, the “Yunong Cooperation” comprehensive service platform had 115 clients online, covering more than 50 thousand farmers.

#### **5. Empowering rural development through financial services**

The Bank fully implements the concept that “lucid waters and lush mountains are invaluable assets”, focusing on the ecological governance of Wanfeng Lake and the resettlement of fishermen as two core priorities. The Bank innovatively develops a multi-stakeholder cooperative financial service

model to provide diversified financial support and integrated solutions for resettled fishermen, farmers, and new citizens during their transition in production and employment models. Focusing on key pain points such as insufficient start-up capital, limited access to technical support, constrained re-employment channels, and weak credit profiles that hinder access to traditional financing, the Bank develops innovative financial service channels based on “multi-party cooperation and industrial chain integration”. Through bank–enterprise collaboration and industrial linkage, the Bank ensures precise delivery of financial services to real needs, and facilitates the transformation of ecological governance outcomes into economic and social development achievements, thereby demonstrating a model of bank–government cooperation for translating ecological value into economic value under the “Two Mountains” concept. As of the end of the first half of 2026, through innovative channels such as “bank–enterprise–community–farmer” collaboration and “production–supply–marketing” linkages, the Bank had provided financial services support to more than 40 thousand resettled fishermen, farmers, and new urban citizens.

## **6. Financial services on Internet platforms**

The Bank carries out strategic cooperation with leading internet enterprises such as Meituan, DiDi and Taobao, focusing on two core client segments: platform-based small and micro merchants and individuals in new forms of employment. The Bank has developed integrated service solutions tailored to these groups. For platform-based small and micro merchants, the Bank has innovatively launched the comprehensive financial service of the “Business Card”. This solution significantly enhances the accessibility of financial services for small and micro merchants. Merchants can upgrade their CCB savings cards into the “Business Card” with one click in the merchant App, using the card as the payment and receipt account on internet platforms. Leveraging fintech capabilities, the “Business Card” intelligently integrates merchants’ income and expenditure data across platforms, providing a cross-platform and cross-store “super statement” function, which effectively lowers the barriers to financial management for small and micro merchants. As of the end of the first quarter of 2026, the “Business Card” had served 3.38 million small and micro

customers on leading internet platforms, effectively addressing inefficiencies in traditional manual reconciliation and enabling more small and micro merchants to benefit from digital financial services.

### **7. Social security “smart payment” extending service reach**

Focusing on underserved groups such as urban and rural residents and individuals in flexible employment, the Bank has innovatively launched the social security “Smart Payment” service, leveraging digital capabilities to enhance the reach of financial services and significantly improve the accessibility of social security-related financial services. The “Smart Payment” service features the “three multiples and three full coverage” characteristics, namely multiple payment channels, multiple payment methods, multiple insurance categories, 24/7 availability, full scenario support and comprehensive information coverage, providing greater convenience for clients in underserved regions and segments. While optimising client experience, the service also enhances the efficiency of government collection and administration, effectively enabling “data to run more errands while people run fewer errands”. The Bank delivers high-quality financial services precisely to various client groups, providing strong support for livelihood security.

### **8. Partnering with government institutions to build an integrated medical insurance service system**

As a financial institution engaged in a head-to-head strategic cooperation with the National Healthcare Security Administration, the Bank has innovatively developed the online full-process “Smart Medical Insurance” service brand, further expanding the inclusiveness and accessibility of medical insurance-related financial services. The Bank provides high-quality, efficient and convenient financial services to medical insurance authorities at all levels, insured enterprises, medical institutions and individual policyholders.

**Building an integrated financial–operational medical insurance module:** The Bank provides medical insurance authorities at all levels with an online one-stop service covering fund transfers, enquiries and electronic receipts, supporting the integrated financial and operational management of medical insurance, which helps enable paperless operations and off-site fund

processing, effectively extending front-end services to grassroots and remote areas.

**Developing a mobile banking medical insurance service zone:**

Through a head-to-head connection with the National Healthcare Security Administration, the Bank enables nationwide coverage of medical insurance QR code display services. Underserved groups such as elderly people, rural residents, new citizens and persons with disabilities can more easily access services including insurance enrolment and contribution enquiry, cross-region medical treatment filing, appointment registration, medical service payments and pharmacy payments, as well as medical insurance-related financial products such as medical insurance protection products and health investment plans.

**Designing a cross-province medical insurance pooling module:** The Bank was among the first to launch a full-process service system for the cross-provincial mutual aid of individual accounts under employee medical insurance, establishing a four-level settlement framework covering provincial-to-provincial, provincial, municipal and individual levels. The system provides medical insurance authorities at all levels with services including the opening, replacement and fund transfer of official medical insurance wallets, enabling the cross-provincial use of employee medical insurance individual account funds among close family members. This effectively facilitates the wider sharing of healthcare financial benefits and extends their reach to a broader segment of the public.

## **(VI) Innovation in Outlets and Offline Service Channels**

The Bank continues to deepen outlet transformation and innovate offline service channels, and is committed to building an extensive service network with comprehensive functions and distinctive features. The Bank optimises the layout of physical channels, coordinates branch resources in a well-planned manner, and enhances overall financial service accessibility. The Bank further strengthens the development of service networks in county-level and rural areas, supporting more balanced access to financial services between urban

and rural regions. In addition, the Bank enhances the development of specialised outlets and diversified service scenarios, effectively improving the comprehensive service capabilities and social value of branches.

### **1. Expanding physical channels**

Upholding channel innovation and service optimisation, the Bank actively promotes the coordinated development of physical channels, and continuously advances the construction of channels such as branches, self-service equipment, and specialised service operations, to make services more accessible. While expanding overseas branches, the Bank fully considers situations including client demands, market environment, and cultural background in the places of operation, conducts in-depth research on the financial service needs in the places of operation, and continuously optimises the layout of branch operations, to maximise the accessibility of financial services. For details of the Bank's institutional and outlet network, please refer to the section "FinTech and Channel Operation" under "Management Discussion and Analysis – Business Review" in the Bank's *2025 Annual Report*<sup>12</sup>.

### **2. Supporting financial services at the county level**

The Bank continues to strengthen the building of financial service networks in county areas. As of the end of the first quarter of 2026, the Bank had 4,286 outlets in county areas, an increase of 10 compared to the same period last year, and the proportion of outlets in county areas rose to 30.72%, an increase of 0.31 percentage points over the same period last year. In terms of the outlet layout strategy, the Bank highlights wider coverage of financial services in economically strong counties, populous counties, and prosperous counties and towns. As of the end of the first quarter of 2026, the Bank had newly established or relocated and optimised 18 outlets in county-level areas, continuously improving the accessibility and convenience of financial services in these regions.

### **3. Strengthening construction of characteristic outlets**

---

<sup>12</sup> 2025 Annual Report: [http://www.ccb.com/eng/2026-04/27/article\\_2026042717183458148.shtml](http://www.ccb.com/eng/2026-04/27/article_2026042717183458148.shtml)

The Bank continues to empower the construction of characteristic outlets. Focusing on the strategic layout for the “Five Priorities”, the Bank prioritises efforts to build service outlets specialising in inclusive finance and pension finance, while advancing the building of green outlets and digital outlets, driving the transformation of outlet services into an ecosystem integrating financial and non-financial scenarios. The Bank continuously enriches the services of the “Workers’ Harbours”, deepens the “Workers’ Harbours+” service model, and actively carries out multi-level cooperation with government departments, relevant industrial organisations, enterprises and public institutions, and nearby communities to deliver convenient services to the people. The Bank opens outlet services to the public in a coordinated manner, providing basic services for the public to have a break, drink water, charge mobile phones, and heat meals, and continuously explores characteristic services related to support for elderly and disabled people, low carbon and environmental protection, and rural revitalisation. As of the end of the first quarter of 2026, the Bank had opened 13,730 “Workers’ Harbours” in total, adopted the “Workers’ Harbours +” model at 12,616 outlets, and opened restrooms to the public at 10,971 “Workers’ Harbours”, serving 373 million offline visits.

## **(VII) Innovation in Mobile and Online Channels**

The Bank actively promotes the upgrading of digital financial services by innovating mobile application scenarios, enriching the portfolio of online service products, and optimising intelligent interaction processes, with a focus on enhancing the convenience, accessibility and personalisation of financial services. The Bank further expands the coverage of online channels, and promotes the extension of mobile financial services to lower-tier markets based on a thorough assessment of the needs of underserved regions and specific customer segments, enabling a broader population to access efficient, secure and user-friendly digital financial services anytime and anywhere.

### **1. Innovation in mobile banking financial services**

Targeting the needs of special groups such as elderly people, people with disabilities, and people of ethnic minorities, the Bank optimises the operation interface and usage process of mobile banking, simplifies operation steps, adds

auxiliary functions, and provides multilingual services, effectively improving the convenience of financial services, and ensuring that all client groups have equal and easy access to digital finance services.

In terms of serving elderly clients, the Bank continues to enhance the elderly-friendly upgrades of mobile banking. Intelligent recommendation of large-print services accurately guides elderly clients to obtain services. The Bank adjusted the functional layout of the elderly-appropriate version so that account enquiry, deposit products, livelihood payment, medical insurance and social security, and manual customer service, which are cared about by the elderly clients, can be directly clicked on the homepage, making high-frequency functions more easily accessible. The Bank further improved the coverage of scenario-based optimisation to better match the visual habits of the elderly, significantly lowering the barriers to elderly users to use digital financial tools, and allowing the fruits of technological development to better benefit the silver-haired group. As of the end of the first quarter of 2026, mobile banking had provided online services to 16.82 million elderly clients.

In terms of serving clients with disabilities, the Bank fully supports the screen-reading feature of mobile phone systems, achieving accurate reading of page elements. Meanwhile, the Bank innovatively applies intelligent voice recognition, semantic understanding, and natural language processing technologies, along with biometric authentication, to build an easy-to-use voice interaction service system. The Bank actively optimises the user experience for visually impaired customers and carries out accessibility inspections and improvements to ensure that visually impaired clients have no difficulties in using various financial services. As of the end of the first quarter of 2026, mobile banking had provided more than 40 thousand barrier-free services to clients with disabilities.

In terms of serving people of ethnic minorities, the Bank has introduced the Tibetan version of mobile banking, which provides localised translation of core features such as account inquiry, fund transfer, and credit card repayment, making feature descriptions easier to understand. To ensure product experience, the Bank continuously collects customer feedback and promptly carries out product design optimisation to ensure translation accuracy and

usability.

## **2. Innovation in life service scenarios**

The “CCB Lifestyle” continuously enriches local life services, and offers one-stop services for spending, saving, borrowing, and making money, enabling financial resources to reach areas with difficulty in accessing financial services. As of the first quarter of 2026, the platform had recorded more than 450 thousand quality merchant stores.

The Bank actively responds to the national call to expand domestic demand and boost consumption. Leveraging “CCB Lifestyle”, the Bank continues to carry out special activities to undertake government consumer vouchers and fully supports the issuance of consumer subsidies for consumer goods trade-ins, among others. As of the end of the first quarter of 2026, “CCB Lifestyle” had cumulatively undertaken the issuance of government consumer subsidies in 117 cities across the country, covering various consumption scenarios such as home appliances, home decoration, automobiles, house purchases, catering, supermarkets, and cultural travel. The subsidy programs involved 1.25 million participants, disbursed subsidies nearly RMB1 billion, and drove RMB14 billion in consumer spending related to people’s livelihoods.

## **3. Innovation in remote financial service system**

The Bank leverages digital technologies to build an integrated remote financial service system, realising connectivity of multimedia channels, penetration into multi services scenarios, and precise reach of diverse features. Covering multiple business areas such as voice navigation, consulting services, repayment reminders, and intelligent invitations, the system provides clients with a full range of efficient and convenient financial services. The average number of clients served by telephone voice navigation is about 418.4 thousand per day, and the average number of clients served by online intelligent consultation is over 543.6 thousand per day. The intelligent repayment reminder covers 13 business scenarios such as credit cards, personal loans, small and micro enterprise loans, and farmer loans. The intelligent invitation service has reached over 13.34 million customer visits. As of the end of the first quarter of 2026, 90.475 million client consultations were received, and customer

satisfaction rate exceeded 99.7%. The Bank continues to strengthen the development of intelligent services, and based on the characteristics of clients in each channel and the track of business handling, the Bank quickly predicts potential needs and achieves the “answers before asking” of client questions. The Bank provides “Every One of A Thousand” service solutions through active push, marketing pop-ups, question-and-answer scenarios and other links, and uses customer service assistants to assist in rapid response to client needs; the Bank creates a new media matrix of “CCB Customer Service”, opens official accounts on platforms such as WeChat, Toutiao, Xiaohongshu, Weibo, and Douyin, and the number of fans in the matrix has exceeded 58.85 million, serving over 270 thousand user visits per day on average. Targeting the needs for financial services in county and rural areas, the Bank actively carries out remote consulting services, and has established a three-level response system of “AI client service + live agent + branch staff”, enabling accurate identification of client needs and real-time response to frequently-asked questions, and effectively enhancing the coverage and availability of financial services.

In addition, the Bank focuses on addressing customers’ urgent and difficult needs in relation to livelihood services, and has developed high-quality and efficient remote video banking services to meet customers’ financial needs without requiring in-person visits. The Bank has launched nine application scenarios, including emergency account restriction removal and limit adjustment, debit card password reset, “Longyixing” remote review, and video-based verification and agency services. As of the end of the first quarter of 2026, the service handled an average of approximately 4,500 customer transactions per day.

#### **4. Innovation in financial services at clients’ doorstep**

The “CCB Doorstep Service” runs on a contactless financial service model. By integrating internal resources and third-party logistics systems, “CCB Doorstep Service” extends traditional outlet services to clients’ doorstep, and effectively connects online and offline channels. For physically delivered financial products and services, “CCB Doorstep Service” provides professional distribution solutions, enabling clients who are mobility-impaired or unable to visit outlets to access safe and convenient financial services without leaving

home, making financial services more accessible to the people in areas with a shortage of financial services. As of the end of the first quarter of 2026, the “CCB Doorstep Service” financial service had supported “at-home” products including personal credit certificates and bank confirmation letter delivery, and had provided convenient and efficient home delivery services for more than 29.5 million clients in total.

### **5. Innovation in digital services at outlets**

The Bank actively advances the building of digital service capabilities at all outlets. Based on the “micro-application” model, the Bank extends outlet services to online platforms such as mobile banking, “CCB Lifestyle” App, official WeChat Mini Program, and “CCB Huidongni” App, unifying services including outlet inquiry, outlet information browsing, online queuing, service appointment pre-processing, and CCB Doorstep Service across all channels. This helps move business processes forward, and substantially improves the efficiency of financial services. As of the first quarter of 2026, the Bank provided digital services to more than 8,433.7 thousand visits per month, bringing convenience to clients while easing the burdens on outlets.

### **6. Innovation in services on intelligent mobile terminals**

The Bank fully leverages the advantages of the “Longyixing” intelligent mobile terminals to create an innovative “mobile banking” service model. The Bank records 20.6 thousand “Longyixing” intelligent mobile devices in total, of which 5,861 are deployed in county areas, widely covering regions with a shortage of financial services.

The “Longyixing” intelligent mobile terminals support 175 financial services under 11 major categories, including account opening, loss reporting and loss report cancellation, password reset, e-banking contract signing, and client information modification. For some disabled persons with mobility difficulties, elderly people, urban migrant workers, and residents in high-altitude or remote rural areas with limited financial resources, the Bank’s employees can provide various kinds of door-to-door services by taking the “Longyixing” intelligent mobile terminals to hospitals, construction sites, enterprises, etc. In the first quarter of 2026, 91.6 thousand door-to-door services enabled by the

“Longyixing” intelligent mobile terminals had been recorded, including more than 8.8 thousand services for special groups such as elderly clients, effectively filling the gap in financial services.

### **7. A one-stop platform of comprehensive intelligent campus services**

In active response to the strategic national goal of building a “leading country with high-quality education system, science and human resource”, the Bank fully leverages the strength in fintech, and develops “CCB Smart Campus Application” comprehensive service platform, integrating multiple mobile channels such as Apps, WeChat and Alipay applets and building a one-stop smart campus service system. With the “CCB Smart Campus Application” platform, teachers, students and parents have easy access to the whole process of campus services, including registration, consumption payment, classroom learning, campus life, internship and employment, and alumni services. This effectively solves the pain points in campus information system building, such as scattered university management systems, cumbersome procedures, and time-consuming queuing for payment. As of the end of the first quarter of 2026, the service scope of the “CCB Smart Campus Application” platform had covered 31 provinces and cities across the country, with a total of 980 universities and 46.2 thousand K12 schools connected, serving more than 28.07 million teachers, students and parents.

### **8. A one-stop platform of comprehensive health management services**

The Bank thoroughly implements the strategy of “Healthy China”, and builds “CCB Smart Healthcare Application” health management integrated service platform. The Bank fully leverages fintech means, integrates cutting-edge technologies such as Internet, cloud computing, and big data, and builds an “Internet + health” service ecosystem covering governments, businesses and consumers, to enhance healthcare services with information technology. The “CCB Smart Healthcare Application” platform covers dozens of ecosystem scenarios and comprises hundreds of functional modules, providing clients with nearly a thousand health service items such as whole-process online medical

consultation, Internet hospitals, cloud-based HIS systems, and hospital financial reconciliation. For government departments (G-end), the “CCB Smart Healthcare Application” platform helps build a healthy city management system, improving the quality of healthcare, medical insurance, and pharmaceutical management. For medical institutions (B-end), “CCB Smart Healthcare Application” provides core HIS system building and financial reconciliation services, driving the digital transformation of hospitals. For patients (C-end), “CCB Smart Healthcare Application” enables whole process online services of registration, consultation, and payment, etc., effectively easing the pain points in healthcare services such as the difficulties in accessing medical care and registering for medical appointments. As of the end of the first quarter of 2026, the service scope of the “CCB Smart Healthcare Application” platform had covered 31 provinces and cities across the country, with a total of 1,577 hospitals online, providing comprehensive medical financial services to more than 13.21 million patients.

### **9. Innovation in prepaid funds for elderly care services**

In actively responding to the national drive for establishing the elderly care service system, the Bank innovatively creates elderly care prepaid funds service scenarios by leveraging the “Elderly Care Platform”, strictly adheres to the guidance and rules of civil affairs departments on strengthening the prepaid funds for elderly care institutions, implements closed-loop management for the collection of fees, disbursement, refunds, and other fund flows, precisely monitors and controls abnormal behaviours, realises the standardisation of business processes such as agreement signing, check-in and check-out, bill management, termination and cancellation, fully protecting the fund security and legal rights and interests of the elderly, effectively helping the civil administration departments in strengthening the supervision and management of the prepaid funds collected by the elderly care institutions, and further enhancing the social credibility of elderly care service institutions. As of the end of the first quarter of 2026, the Bank had applied the scenarios of prepaid funds supervision in more than 560 elderly care institutions in 19 provinces and cities, including Beijing, Shanghai, Jiangsu, Shandong, among others.

### **10. Supporting for Rural Collective Economic Development**

In active response to the *Rural Collective Economic Organizations Law of the People's Republic of China*, the Bank has promoted the “Collective Credit Loan” product and established a financial service certification system for rural collective economic organisations, supporting their online credit application processes. Loan proceeds may be used for purchasing production materials and supporting production and operations. Meanwhile, the Bank has developed an innovative credit scoring card for rural collective economic organisations, analysing their behavioural characteristics to enhance the Bank’s ability to assess operational risks and improve its agricultural-related risk evaluation framework. As of the end of the first quarter of 2026, the “Collective Credit Loan” had cumulatively served 3,136 rural collective economic organisation clients, with an outstanding credit balance of RMB5.73 billion. The “Credit Scorecards” had cumulatively served 33 thousand rural clients, effectively supporting the development of rural collective economies and the achievement of common prosperity for farmers.

### **11. Characteristic financial services for pastoral areas**

The Bank’s Inner Mongolia Autonomous Region Branch leverages intangible cultural heritage and local characteristics by establishing a “Financial Wulanmuqi Publicity Team”, promoting the extension of financial resources to grassroots communities. Through bilingual (Mongolian and Chinese) outreach and a “three-lead and one-integration” model, the team enhances the impact of financial education and consumer protection awareness, integrating these concepts into grassroots services and daily community life. The team conducts specialised financial service activities in communities, schools, rural areas, commercial districts and pastoral regions, organising 352 events with a total outreach of over 2.69 million people. The branch has also innovated a “five-one” service system, featuring one lesson, one vehicle, one leaflet, one initiative and one square metre, to build a tangible and accessible consumer protection service model. In addition, the “Consumer Protection Pioneer Team” has been established, using mobile publicity vehicles, merchant risk alerts and “Yunongtong” service corners to build a multi-layered service network. Core services such as basic financial consultation, account opening and credit matching are delivered directly to pastoral areas, rural communities and

business districts, effectively addressing the “last-mile” challenge in financial service accessibility. By integrating local media and community communication channels, the Bank has formed a comprehensive and multi-dimensional outreach mechanism, ensuring full coverage and targeted delivery of consumer protection knowledge, while further enhancing the effectiveness of initiatives and the influence of consumer protection brand.

## V Charity

The Bank thoroughly fulfils the social responsibility as a major state-owned bank. The Bank leads employees to participate in public welfare, leads clients to participate in public welfare, leads operations to participate in public welfare, and integrates business with public welfare. The Bank gives full play to the financial expertise, and organises various public welfare activities and volunteer services, providing thousands of families with sincere services and continuously spreading positive energy across the society.

The Bank formulates an annual Group-level donation plan at the beginning of each year and submits it to the Board of Directors for deliberation. Priority is given to supporting funding needs for consolidating poverty alleviation achievements and rural revitalisation across the Bank, while continuously supporting long-term public welfare projects initiated by the Head Office, thereby building the Bank's public welfare brand. Meanwhile, the Bank analyses other public welfare needs from Head Office and branches, and conducts comprehensive evaluation from the perspectives of national strategies and urgent social needs, so as to meet the most pressing and prioritised demands. In 2025, the Bank's total external donations amounted to RMB136 million, with a focus on supporting poverty alleviation consolidation and rural revitalisation, long-term public welfare programmes, emergency disaster relief and innovation in public welfare activities. Among these, the Bank made an emergency donation of HKD10 million for fire relief in Tai Po, Hong Kong, and provided disaster relief assistance of over RMB2 million for floods, earthquakes and typhoons in Beijing, Xizang, Taiwan, Malaysia and other regions.

The Bank consistently regards education-related public welfare as an important aspect of the social responsibility, and continues to build a comprehensive, multi-level education assistance system. Long-standing programmes such as the Building the Future – CCB Sponsorship Programme for the Development of Poverty-stricken High School Students and CCB Hope Primary Schools have cumulatively benefited 100 thousand teachers and students, effectively safeguarding the right to education for vulnerable groups. Different branches actively implement locally tailored initiatives. The Shanghai

Branch organises the “Gratitude in Construction, Meeting the Future” summer camp for children of urban builders; the Sichuan Branch launches the “Soma Flower Blossoms, Meeting the Future” scholarship programme; the Hebei Branch implements the “CCB Star Companion Journey” initiative supporting children with disabilities; and the Shandong Branch builds a “Goodness and Brightness” public welfare ecosystem to support visually impaired children. The Bank has gradually formed a multi-dimensional education assistance network covering special groups and remote regions, continuously promoting equal access to educational opportunities.

The Bank also cares for outdoor workers and consolidates cooperation with the All-China Federation of Trade Unions in co-building worker service stations (Workers’ Harbours). The Bank continues to deepen public welfare initiatives at these stations and conducts the “Mutual Care and Support” pilot programme. Several “Workers’ Harbours” have been recognised as “Most Beautiful Trade Union Service Stations / Outdoor Workers’ Service Sites” by the All-China Federation of Trade Unions, with the Bank ranking first among financial institutions in total recognitions since 2021.

The Bank consistently fosters employees’ public welfare spirit and encourages young employees to actively participate in social welfare initiatives by establishing a sound volunteer service system. As of June 2026, the Bank has more than 76 thousand young volunteers, who have contributed a total of 130 thousand service hours, benefiting 900 thousand people, continuously contributing the strength of the Bank to social harmony.

#### **Case: Ecosystem protection through public welfare donations**

The Bank makes the protection of ecological environment a key area for public welfare donations, which is clearly stipulated in the *Management Measures on Donations*, and continues to increase investment. Since 2022, the Bank has donated a total of RMB7 million to the Sanjiangyuan area for four consecutive years, and the funds have been used to support protection projects such as the development of ecological villages. The move helped protect the ecological environment at the water source area, and promoted

the implementation of the concept of harmony between humanity and nature. Meanwhile, all branches carried out special protection projects based on the ecological characteristics of respective regions: the Inner Mongolia Branch donated to sand prevention projects, effectively curbing further desertification by planting saxaul forests; the Xizang Branch donated to afforestation activities, continuously improving the ecological environment on the plateau, and fully demonstrating the Bank's efforts to fulfil the responsibility in ecological protection.