

商业道德

Business Ethics

1.道德事务监督

1.Oversight of Ethics Issues

本行明确董事会、高级管理层等在贪污受贿等涉刑案件风险防控中的职责分工,董事会承担案件风险防控最终责任,高级管理层承担案件风险防控执行责任,并与公共部门密切合作,以确保相关工作得以恰当充分地实施。2025年,本行董事会及其审计与合规管理委员会审议通过《2024年案件风险防控评估报告》,推动提升全行案件风险全链条防控水平。

The Bank has clearly defined the division of responsibilities between the Board of Directors, Senior Management and other departments in risk prevention and control of criminal cases such as corruption and bribery. The Board of Directors assumes the ultimate responsibility for risk prevention and control of cases, while Senior Management is responsible for the implementation of related measures. The Bank also collaborates closely with public authorities to ensure that all relevant work is appropriately and effectively carried out. In 2025, the Bank's Board of Directors and its Audit and Compliance Committee considered and approved the 2024 Report on Case Risk Prevention and Control Assessment, further advancing the Bank's capacities in end-to-end case risk prevention and control.

2. 贿赂与反腐败政策

2. Bribery and Anti-corruption Policy

本行持续完善反腐败相关制度，制定并公布《中国农业银行反贿赂反贪腐政策要点》¹，从适用范围、总体原则及要求、重点关注领域及要求和管理机制等方面系统规范本行反贿赂反贪腐相关工作。

The Bank continues to refine its regulations related to anti-corruption. We formulated and issued the *Key Policies on Anti-Bribery and Anti-Corruption of Agricultural Bank of China*². This policy systematically standardizes the Bank's anti-bribery and anti-corruption work in areas such as scope of application, general principles and requirements, key focus areas, and management mechanisms.

制定适用于本行集团的《中国农业银行员工行为守则》，通过持续教育和培训，确保员工理解和遵守，提升职业道德水平和运营效率。明确要求全体员工自觉践行“爱岗敬业、诚实守信、勤勉尽职、依法合规”等准则，廉洁自律，严禁员工以任何方式索取、收受贿赂或谋取不当利益。制定《中国农业银行责任追究管理办法》、《中国农业银行员工行规处分办法》等制度，明确责任追究实体及程序性规定。制定适用于本行境内各级机构的《涉刑案件风险防控管理办法》，压实各级机构案防主体责任，健全案件风险全链条防控机制。制定适用于本行境内外各级机构的《关联交易管理办法》及其《关联交易管理实施细则》、《金融市场业务交易人员行为管理办法》等，将权力置于制度的约束之下。

¹敬请参阅本公司官方网站“农行 ESG-政策要点”栏目发布的《中国农业银行反贿赂反贪腐政策要点》：[P020250626658206198934.pdf](https://www.abchina.com/cn/abc/esg/policy-highlights/p020250626658206198934.pdf)

²Please refer to the *Key Policies on Anti-Bribery and Anti-Corruption of Agricultural Bank of China* issued in “ABC ESG - Policy Highlights” section of the official website of the Agricultural Bank of China: [P020250626658206198934.pdf](https://www.abchina.com/cn/abc/esg/policy-highlights/p020250626658206198934.pdf)

We formulated the *Code of Conduct for Employees of the Agricultural Bank of China* for implementation across the Group, ensuring that employees understand and comply with it through ongoing education and training, thereby enhancing their professional ethics and operational efficiency. This code of conduct clearly requires all employees to consciously uphold principles such as dedication to their duties, honesty, diligence, and compliance with laws and regulations, to maintain integrity and self-discipline, and strictly prohibits employees from soliciting or accepting bribes or seeking improper benefits by any means. We established regulations including the *Measures for Managing Accountability of Agricultural Bank of China* and the *Management Measures for Disciplinary Actions against Employees of Agricultural Bank of China*, clearly defining the responsible parties and procedural provisions for accountability. We also formulated the *Management Measures for Risk Prevention and Control of Criminal Cases* applicable for domestic institutions at all levels, defining their primary responsibilities for case prevention, and improving the full-chain prevention and control mechanism for case risks. We formulated for domestic and overseas institutions at all levels the *Measures for the Administration of Related Party Transactions*, the *Detailed Implementation Rules for the Administration of Related Party Transactions*, the *Measures for the Administration of the Behavior of Financial Market Business Transactions*, etc., to put power under the constraints of regulations.

3. 供应商反腐败政策

3. Anti-Corruption Policy for Suppliers

制定《集中采购管理办法》、《集中采购操作规程》等制度，在业务流程中明确反贿赂、反贪污要求。修订《中国农业银行集中采购供应商不良行为管理细则》，将供应商行贿或输送其他不正当利益的行为列入不良行为管理，增强供应链风险抵御韧性。《中国农业银行集中采购管理办法》适用于本行境内各级机构。《中国农业银行集中采购操作规程》适用于本行总行及境内一级、二级分行。《中国农业银行集中采购供应商不良行为管理细则》适用于本行境内各级机构。

We formulated policies such as the *Management Measures for Centralized Procurement* and the *Centralized Procurement Operating Procedures*, clarifying anti-bribery and anti-corruption requirements in business processes. We revised the *Detailed Rules on the Management of Supplier Misconducts in Centralized Procurement of Agricultural Bank of China*, including suppliers' bribery or provision of other improper benefits as the scope of misconduct management, thereby enhancing the resilience of the supply chain against risks. The *Management Measures for Centralized Procurement* is applicable for the Bank's domestic institutions at all levels. The *Centralized Procurement Operating Procedures* is applicable for the Bank's Head Office and domestic tier-1 and tier-2 branches. The *Detailed Rules on the Management of Supplier Misconducts in Centralized Procurement* is applicable for domestic institutions at all levels.

推进廉洁采购。打造公正、廉洁、高效的集中采购管理体系，确保反贪腐政策覆盖全部集中采购项目和参与供应商。在准入环节，将供应商违法失信、涉贪腐行为、被本行禁入以及特定关联情形纳入招标采购禁止性条件，防范关联供应商串通投标行为，要求供应商签署廉洁承诺书。在《中国农业银行集中采购平台供应商注册协议》明确，所有申请注册供应商须遵守国家相关法律法规，不得利

用平台进行任何违法或不正当的活动，相关承诺要求覆盖全行所有集中采购供应商。通过中国招标投标协会-金融行业招标采购专业委员会平台，获取同业不良供应商信息，及时识别和分析风险。通过电子招投标平台自动监测和识别供应商围标串标行为。建立涉案供应商“关注名单”，对存在串通、行贿或输送其他不正当利益行为的供应商采取禁用措施，并向社会公示。

Promote honest procurement. We established a fair, transparent, and efficient centralized procurement management system, ensuring that anti-corruption policies cover all centralized procurement projects and participating suppliers. During the supplier admission process, we incorporate conditions such as illegal and dishonest behavior, bribery and corruption, being banned from participating by the Bank, and specific related-party situations as prohibited conditions for bidding and procurement, to prevent collusion among related suppliers. We also require suppliers to sign integrity commitment letters. The *Supplier Registration Agreement for the Centralized Purchasing Platform of Agricultural Bank of China* explicitly stipulates that all suppliers applying for registration must comply with relevant national laws and regulations and are prohibited from using the platform for any illegal or improper activities. These commitment requirements apply to all centralized procurement suppliers of the Bank. Through the platform of Financial Industry Bidding and Procurement Committee under the China Tendering & Bidding Association (CTBA), we can obtain information on untrustworthy suppliers from industry peers, enabling timely identification and analysis of associated risks. We utilize an electronic bidding platform to automatically monitor and detect collusive bidding among suppliers. We established a "Watchlist" for suppliers involved in related cases, took prohibitive

measures against suppliers involved in collusion, bribery, or providing other improper benefits, and publicly disclosed such information to the society.

4. 举报人保护

4. Whistleblower Protection

本行依法维护员工权益、规范信访秩序。畅通举报途径，倾听员工心声，接受员工监督，对信访渠道收到的投诉、举报等事项严格实施保密管理，致力于营造公正、透明、和谐的工作环境。

The Bank safeguards employees' rights and interests and standardizes the complaint handling in accordance with the law. We provide smooth channels for whistleblowing, listen to employees' voices, accept their supervision, and implement strict confidentiality measures for complaints, whistleblowing, and other matters received through complaint channels, striving to create a fair, transparent, and harmonious work environment.

制定并公布《中国农业银行举报政策要点》³，明确举报政策的适用人员范围、举报渠道及方式、举报信息保密与举报人保护、举报处理程序、失实举报问责、举报人义务等举报相关具体事项。本行制定《中国农业银行办理群众来信工作规则》、《中国农业银行接待群众来访工作规则》、《中国农业银行信访督查督办工作规则》等制度，明确信访工作举报人保护工作机制，以及登记、受理、办理、督办等各环节的程序、标准、时限和责任。报告期内，本行修订《中国农业银行

³敬请参阅本公司官方网站“农行 ESG-政策要点”栏目发布的《中国农业银行举报政策要点》：[P020250626658355100263.pdf](#)

信访工作管理办法》，明确各级机构依法按政策及时就地解决群众合法合理诉求，维护正常信访秩序。各级机构及其工作人员办理信访事项，应当恪尽职守、秉公办事，查明事实、分清责任，加强教育疏导，及时妥善处理，不得推诿、敷衍、拖延。办理信访事项过程中，依法做好信访人个人信息保护。

The Bank has formulated and issued the *Key Policies on Whistleblowing of Agricultural Bank of China*⁴, which clearly defining the scope of personnel covered by the policy, whistleblowing channels and mechanisms, confidentiality of reported information and whistleblower protection, whistleblowing report handling procedures, accountability for false reporting, the obligations of whistleblowers, and other specific whistleblowing-related matters. The Bank formulated the *Working Rules for Handling Letters from the Masses of the Agricultural Bank of China*, the *Working Rules for Receiving Visitors from the Masses of the Agricultural Bank of China*, and the *Rules for Supervision and Urgent Handling of Complaints and Appeals of the Agricultural Bank of China*, etc., clarifying the mechanism of whistleblower protection in complaints and appeals, and procedures, standards, timeframes, and responsibilities for various links such as registration, acceptance, handling, and supervision. During the reporting period, the Bank revised the *Management Measures for Complaints and Appeals Work of the Agricultural Bank of China*, clearly stipulating that all levels of institutions should promptly and locally address legitimate and reasonable public appeals in accordance with laws and policies, and maintain the order of complaint

⁴Please refer to the *Key Policies on Whistleblowing of Agricultural Bank of China* issued in “ABC ESG - Policy Highlights” section of the official website of the Agricultural Bank of China:

[P020250626658355100263.pdf](#)

handling. When handling complaints, all institutions and their staff should perform their duties diligently, act impartially, ascertain facts, clarify responsibilities, strengthen education and guidance, and ensure timely and proper resolution. They must not shirk responsibility, make excuses, or delay processing. During the complaint handling, the Bank ensures the lawful protection of personal information of complainants.

2025 年，本行通过自查自纠、抽查督办、量化评分等方式，进一步提升信访工作标准化、规范化水平，推动从源头上解决信访问题。对检举控告类信访事项，依法依规转送交办有关部门妥善处理，切实维护举报人合法权益。定期开展信访业务规范化建设评查，切实维护信访人合法权益。

In 2025, the Bank further enhanced the standardization and normalization of complaint handling through self-examination and self-correction, spot checks and supervision, quantitative scoring, and other methods, facilitating the resolution of complaints from their sources. Whistleblowing-related complaints were forwarded to relevant departments for proper handling in accordance with laws and regulations, which helped effectively safeguard the legitimate rights and interests of whistleblowers. We regularly conducted evaluations on the normalization of complaint handling to effectively safeguard the legitimate rights and interests of complaints.

本行将信访工作纪律和保密管理作为信访培训的重要内容，明确信访事项全流程保密管理要求，强化举报工作人员保密意识和保密责任，切实做好举报人和举报事项等敏感信息保护。

The Bank has incorporated complaint handling discipline and confidentiality management as key contents of complaint handling training, specifying the confidentiality requirements throughout the entire process of complaint handling to strengthen the confidentiality awareness and responsibilities of complaint handling staff, and effectively protect sensitive information such as whistleblowers and their complaints.

本行信访事项实现数字化管理，信访管理信息系统用户由总行进行统一的名单制管理，区分地域、机构层级、工作岗位等，为信访工作人员配置系统录入、查询、办理和督办等不同权限，并实施动态调整。非信访工作人员无法通过访问信访管理信息系统知悉信访人信息、信访事项内容、办理流程等。

The Bank has achieved digital management of complaint handling. Users of the complaint handling IT system are managed by the Head Office through a list system, distinguished by region, organizational level, job position, etc. Different permissions such as system entry, inquiry, handling, and supervision are assigned to complaint handling staff, with dynamic adjustments implemented. Non-complaint handling staff cannot access information about complainants, the content of complaints, or handling processes through the complaint handling management information system.

- 举报人保护措施
- 任何单位和个人不得歧视举报人，不得压制、迫害、打击报复举报人。
- 举报工作人员与举报事项或举报人有直接利害关系的，均须回避。
- 不得接受举报人赠送的礼品、礼金或有价证券。

- 举报工作人员应当对举报人的姓名、工作单位、家庭住址等有关情况及信访内容严格遵守有关保密规定。
- 不得向无关人员扩散来信内容，不准擅自将信件带出机关。
- 不得将举报人的检举、揭发材料以及有关情况透露或者转给被检举、揭发的人员或者单位。
- 未经批准，不得对外提供举报统计数据等。

Measures for Whistleblower Protection

- No organization or individual shall discriminate against, suppress, persecute, or retaliate against whistleblowers.
- Complaint handling staff who have a direct interest in the matter or the whistleblower must recuse themselves.
- Gifts, cash, or securities from whistleblowers shall not be accepted.
- Complaint handling personnel shall strictly comply with confidentiality regulations concerning the whistleblower's name, workplace, home address, and the content of the complaint.
- The content of letters shall not be disclosed to unrelated personnel, and letters shall not be taken out of the organization without authorization.
- The whistleblower's accusations, revelations, and related information shall not be

disclosed or transferred to the persons or units being accused or revealed.

- Whistleblowing statistics and other data shall not be provided externally without approval.

举报处理流程

步骤 1	步骤 2	步骤 3	步骤 4
接收信访举报	信访系统录入	有权处理机构和部门处理	跟踪督办

Whistleblowing Handling Processes

Step 1	Step 2	Step 3	Step 4
Receive whistleblowing-related complaints	Enter whistleblowing-related complaints into the handling system	Authorized organizations and departments handle whistleblowing-related complaints	Follow up and supervise

5.反洗钱政策

5. Anti-Money Laundering (AML) Policy

本行深入贯彻中央金融工作会议精神及人民银行反洗钱工作会议要求,严格遵守国家反洗钱相关法律法规和人民银行等监管机构发布的行业指引,加快推进新修订的《中华人民共和国反洗钱法》及各类反洗钱监管新规落实,积极主动对标国际先进标准和最佳同业实践,持续夯实全行洗钱风险管理基础。

The Bank deeply implements the guidelines of the Central Financial Work

Conference and the requirements set out in People's Bank of China's Anti-Money Laundering Work Conference, strictly adheres to relevant national AML laws and regulations, as well as industry guidelines issued by the People's Bank of China and other regulatory authorities. We have accelerated the implementation of the newly revised *Anti-Money Laundering Law of the People's Republic of China* and various new AML regulatory requirements, and actively aligned with international best standards and leading peer practices, to continuously strengthen the foundation of our money laundering risk management.

本行反洗钱工作执行《中国农业银行反洗钱工作基本规范》，该规范适用于本行境内外各级机构、子行、综合化经营子公司等附属机构。本行境外机构和附属机构执行该规范有关要求，同时遵守驻在地法律法规和监管要求，两者规定不一致的，按照从严标准执行。此外，本行还制定实施《反洗钱业务客户尽职调查管理办法》、《反洗钱协查管理规定》等管理办法，以及《高级管理层反洗钱合规管理委员会工作规则》、《金融市场业务反洗钱合规管理操作规程》、《对公国际业务反洗钱及制裁风险尽职调查操作规程》、《中资金融机构反洗钱业务客户尽职调查操作规程》、《一般对公客户反洗钱业务客户尽职调查操作规程》、《反洗钱业务个人客户尽职调查操作规程》、《全球反洗钱及制裁合规治理规定》等规程细则。

The Bank's AML work is governed by the *Basic Norms for Anti-Money Laundering Work of Agricultural Bank of China* (the "Basic Norms"), which applies to all domestic and overseas institutions, subsidiaries, and subsidiaries with integrated operations at all levels. Overseas institutions and affiliated institutions of the Bank implement the requirements of the Basic Norms, while complying with local laws, regulations, and regulatory requirements in their jurisdictions. In cases where

discrepancies exist between the two sets of requirements, stricter standards should prevail. In addition, the Bank developed and implemented a series of management measures, including the *Management Measures for Customer Due Diligence in Anti-Money Laundering*, the *Regulations on Anti-Money Laundering Investigation Cooperation*, as well as detailed operational procedures such as the *Rules of the Senior Management Anti-Money Laundering Compliance Committee*, the *Operational Procedures for Anti-Money Laundering Compliance in Financial Market Business*, the *Operational Procedures for Due Diligence on Anti-Money Laundering and Sanctions Risks in Corporate International Business*, the *Operational Procedures for Customer Due Diligence in Anti-Money Laundering for Chinese Financial Institutions*, the *Operational Procedures for Customer Due Diligence in Anti-Money Laundering for General Corporate Customers*, the *Operational Procedures for Customer Due Diligence in Anti-Money Laundering for Retail Banking Customers*, and the *Global Regulations on Anti-Money Laundering and Sanctions Compliance Governance*.

扎实推进全行洗钱风险评估体系建设。建立健全机构风险评估协作和评估结果共享机制，实现评估全流程线上化处理，引入人工智能辅助工具，推进落实全行产品聚类，准确揭示业务层面洗钱风险。完善客户尽职调查管理体系，做好重点领域客户尽调及风险防控工作，修订客户尽调管理办法及跨境对公尽调规程，升级客户尽调管理基础设施，完善推广境外客户尽职调查（OKYC）系统，加强客户洗钱风险防控。持续优化反洗钱交易监测机制及工具，聚焦关键业务领域及重点洗钱类型，运用 AI 技术针对性优化监测模型，有序开展总分行协同的预警处理，提升反洗钱监测分析工作质效。

Steadily advance the construction of the bank-wide money laundering risk assessment system. We established a sound mechanism for collaborative risk assessment and shared assessment outcomes, enabling whole-process online processing of assessments. By introducing AI-powered tools, we advanced the implementation of product clustering across the Bank, facilitating more accurate identification and disclosure of money laundering risks at the business level. We improved our customer due diligence management system, strengthened customer due diligence and risk prevention and control in key areas, revised the management measures for customer due diligence and the procedures for cross-border corporate customer due diligence, upgraded the underlying infrastructure for due diligence management, and further enhanced and rolled out the Overseas Know Your Customer (OKYC) system to strengthen AML risk prevention and control. We continuously optimized our AML transaction monitoring mechanisms and tools, focusing on key business domains and high-risk money laundering typologies. By leveraging AI technology, we refined monitoring models in a targeted manner, and systematically carried out early warning handling coordination between the Head Office and branches, significantly improving the quality and efficiency of AML monitoring and analysis.

常态化构建多层次培训体系。系统推进反洗钱培训，覆盖“三道防线”及各层级反洗钱岗位人员，强化全行风险防控意识与实操能力。

Establish a normalized multi-tiered training system. The Bank systematically advanced AML training, covering all three lines of defense and personnel at all levels

in AML-related roles, to strengthen risk prevention and control awareness and practical capabilities across the Bank.

6. 道德标准定期审计

6. Regular Audits of Ethical Standards

本行审计工作坚持“大类机构”和“主体业务”两个全覆盖，持续拓宽审计监督覆盖面。机构覆盖方面，通过分行和子公司风险管理审计等综合性审计以及境外机构审计，每三年实现对 37 家一级分行、6 家综合化经营子公司、16 家境外机构的审计覆盖。业务覆盖方面，将全行主体业务划分为 18 个业务版块，通过分行风险管理审计等综合性审计，及反洗钱、操作风险、消费者权益保护等专项和例行审计，每年实现对监管要求审计事项和 18 个业务版块的全覆盖。

The Bank's audit work adheres to the principle of "full coverage of major institutions and core business lines", with the scope of audit supervision continuously expanded. For institution coverage, comprehensive audits such as branch and subsidiary risk management audits, as well as audits of overseas institutions, are conducted to ensure audit coverage of 37 tier-1 branches, 6 subsidiaries with integrated operations, and 16 overseas institutions on a three-year cycle. For business coverage, the Bank divides its core operations into 18 business segments and ensures annual full coverage of regulatory-mandated audit items and all 18 business segments through comprehensive audits such as branch risk management audits, as well as specialized and routine audits in areas such as AML, operational risk, and consumer interests protection.

本行持续强化反腐败和商业道德相关领域的审计监督，将反商业贿赂及反贪污工作开展情况、廉洁风险防控措施、员工行为道德风险等相关内容纳入审计范围。按照监管部门相关工作要求，依据全行《反洗钱工作基本规范》、《消费者权益保护管理办法》、《操作风险管理基本制度》、《经济责任审计办法》等制度规定，定期在全行范围开展操作风险和员工行为、反洗钱、消费者权益保护、领导人员经济责任审计等商业道德相关审计工作。在审计过程中高度关注商业道德和员工行为相关问题线索，并及时向相关部门移交移送。

The Bank continuously strengthens audit supervision in the areas of anti-corruption and business ethics, incorporating into its audit scope the implementation of anti-commercial bribery and anti-corruption, integrity risk prevention and control measures, and employee conduct-related ethical risks. In accordance with regulatory requirements, and the Bank's policies such as the *Basic Norms for Anti-Money Laundering Work*, the *Management Measures for Consumers' Interests Protection Work*, the *Basic Regulation on Operational Risk Management*, and the *Audit Measures for Economic Responsibility*, we regularly conduct business ethics-related audits covering operational risk and employee conduct, anti-money laundering, consumer interests protection, economic responsibility of leaders. During audit processes, we place high emphasis on issues and leads related to business ethics and employee conduct, promptly referring them to relevant departments for handling.

商业道德相关审计覆盖范围。本行定期开展操作风险和员工行为审计，重点关注案件多发领域业务内部控制措施健全性和有效性，以及关注操作风险的识别和评估、监测、计量、报告、控制等准确性；每年开展反洗钱审计，重点关注反洗钱合规管理措施的规范性和实效性，包括洗钱风险源头识别、评估、控制、报告等工作机制运行情况，以及一二道防线尽职监督情况。每年开展领导人员经济

责任审计，对领导人员所在单位业务经营管理的合法合规和效益情况、内部控制制度的制定和执行情况、风险管控和案件防控情况，以及领导人员在经济活动中落实党风廉政建设责任和遵守廉洁从业规定情况予以重点关注。

Audit Coverage on Business Ethics. We conduct regular audits on operational risk and employee conduct, with a focus on the adequacy and effectiveness of internal control measures in high-risk business areas prone to incidents, as well as the accuracy of operational risk identification, assessment, monitoring, measurement, reporting, and control. We carry out annual AML audits, focusing on the compliance and effectiveness of AML management measures, including the functioning of mechanisms for identifying, assessing, controlling, and reporting money laundering risks, as well as the performance of the first and second lines of defense in fulfilling their supervisory responsibilities. In addition, annual economic responsibility audits are conducted for leaders, with a focus on the legality, compliance, and efficiency of business operations and management in the units they oversee, the formulation and implementation of internal control systems, the management of risk control and case prevention, and the fulfillment of responsibilities related to Party conduct and integrity in economic activities.

充分发挥巡视巡察的监督作用。本行总行行党委将巡视巡察工作作为推进全面从严治党从严治行的重要抓手，充分发挥其对全行商业道德的监督作用。2025年总行分两批对党组织开展巡视监督；各一级分行对直接管辖的党组织也有序开展了巡察监督。监督工作聚焦权力和责任，紧盯“关键少数”、重点领域和关键岗环节权力运行情况，深入查找业务问题背后的责任与根源，助力深化“风腐”同查同治、深化权力规范运行，推动“查、改、治、建”一体贯通，不断增强以

巡促改、以巡促建、以巡促治实效。

Strengthening oversight through inspection and patrol mechanisms. The Bank's Head Office Party Committee regards inspection and patrol work as a key lever for advancing comprehensive and strict governance of the Party and the Bank, and fully leverages its supervisory role in business ethics across the Bank. In 2025, the Head Office conducted two rounds of inspections targeting Party organizations. Each tier-1 branch also carried out patrol supervision over the Party organizations under its direct jurisdiction in an orderly manner. The supervision focused on power and responsibility, closely monitoring the “key few”, key areas, and critical links in the exercise of power, and delves into the underlying responsibilities and root causes behind business issues. These efforts support the integrated investigation and governance of misconduct and corruption, promote standardized power operations, and facilitate the integration of “investigation, rectification, governance, and system building”, continuously enhancing the effectiveness of patrols in driving reform, strengthening systems, and improving governance.

7. 员工道德标准培训

7. Training and Cultural Development

廉洁文化建设。制定《2025 年“廉洁办贷”廉洁文化建设活动实施方案》。以全行信贷领域违纪违法案例为基础，拍摄制作《人生“贷”价》警示教育片，以案释纪、以案释法。围绕警示教育片，推动实施一次集中观看、一次集体学习、一次大讨论、一次宣讲的“四个一”活动。

Integrity Culture Development. The Bank developed the *Implementation Plan for the 2025 “Integrity in Lending” Integrity Culture Building Campaign*. Drawing on cases of disciplinary violations and illegal acts in the Bank’s credit business, we produced and released the warning education film "The Price of a Loan", using real cases to illustrate discipline and law. Centered around this film, the Bank promoted a "Four Ones" initiative: one group viewing session, one collective study session, one in-depth discussion, and one thematic lecture.

厚植合规文化。深入开展合规提质创优活动，以“五要五不”实践要求为引领，以新法新规、重要制度贯彻落实为主线，加大合规标杆创建评选和基础薄弱单位帮扶力度，多渠道推广合规标杆单位经验，大力培育“合规创造价值”的合规文化。

Cultivation of Compliance Culture. The Bank deepened the compliance quality improvement and excellence initiative. Guided by the “Five Musts and Five Nos” practical requirements and centered on the implementation of new laws, regulations, and key institutional frameworks, we intensified efforts to recognize compliance excellence units, while strengthening support for institutions with weaker compliance foundations. Through multiple channels, best practices from top-performing units were widely shared, actively fostering a compliance culture of “compliance creates value”.

廉洁合规教育培训。将内控合规管理等相关内容作为员工参加岗位资格认证考试的必学知识点，纳入全行员工岗位资格认证考试的公共题库。深化新入职员工合规纪律教育，将中央八项规定精神与廉洁警示教育列入新员工入职培训内容。

Training on Integrity and Compliance. We incorporated content related to internal control and compliance management as mandatory study topics for employees participating in job qualification certification exams, and included them in the general question bank for the bank-wide job qualification certification examinations. We also deepened compliance and discipline education for newly hired employees, incorporating the central Party leadership's eight-point decision on improving work conduct and warning education into new employee orientation.

对供应商的道德培训。本行招标文件中向所有投标供应商明示诚信投标、绿色采购、以及廉洁承诺要求，确保每个项目组织潜在投标人“标前会”，倡导供应商廉洁诚信投标，强化供应商社会责任意识，相关措施覆盖全体总行集中采购供应商。加强供应商常态化教育监督，全年开展多层次多品类供应商约谈活动，组织年度重点供应商交流大会，对供应商开展制宣贯，督促供应商恪守商业道德，倡导诚信经营。加强代理机构管理，督促代理机构加强人员专业能力和廉洁教育。

Ethical Training for Suppliers. The Bank clearly communicates to all bidding suppliers in its tender documents the requirements for honest bidding, green procurement, and integrity commitments. For every project, we organize a pre-bid meeting with potential bidders, promoting ethical and honest bidding practices and reinforcing suppliers' sense of social responsibility. These measures apply to all suppliers participating in Head Office centralized procurement. We strengthened ongoing education and supervision of suppliers through multi-level and multi-category supplier dialogues conducted throughout the year. Annual key supplier exchange forums were organized to enhance awareness. We also conducted policy communication and implementation for suppliers, urging them to uphold business

ethics and promoting honest operations. Additionally, we enhanced the management of agencies by requiring them to strengthen professional training and integrity education for their personnel.