公司行为进展

Progress on Corporate Behavior

一、道德标准的定期审计

Ⅰ. Regular Audits of Ethical Standards

1.审计监督

1.Audit Supervision

商业道德审计体系建设。本行审计工作坚持“大类机构”和“主体业务”两个全覆盖，持续拓宽商业道德审计监督覆盖面。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、19 家境外机构的审计覆盖，助力经营机构提升商业道德相关政策要求的落实质效。业务覆盖方面，将全行主体业务划分为 18 个业务版块，并将商业道德相关事项作为审计重点内容。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，每年实现对反腐败和商业道德等监管要求审计事项，及全行 18 个业务版块的全覆盖。

Construction of a business ethics audit system. The Bank’s audit work adhered to the principle of “full coverage of major institutions and core business lines”, with the scope of business ethics audit supervision continuously expanded. For institution coverage, comprehensive audits such as branch and subsidiary risk management audits, as well as audits of overseas institutions, were conducted to ensure audit coverage of 37 tier-1 branches, 6 subsidiaries with integrated operations, and 19 overseas institutions on a three-year cycle, assist business institutions in improving the quality and efficiency of implementing policy requirements related to business ethics. For business coverage, the Bank divided its core operations into 18 business segments and prioritized business ethics-related matters as key audit focus areas.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, the Bank achieved full annual coverage of regulatory compliance items regarding anti-corruption and business ethics, as well as full coverage across all 18 business segments.

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 strengthened 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 conducted business ethics-related audits covering operational risk and employee conduct, anti-money laundering, consumer interests protection, economic responsibility of leaders. During audit processes, we placed high emphasis on issues and leads related to business ethics and employee conduct, promptly referring them to relevant departments for handling.

商业道德审计工作机制。本行已建立并不断完善商业道德事项审计的工作机制。每年制定涵盖商业道德事项的内部审计计划，经行党委会、董事会审批后组织实施相关审计项目。董事会及其审计委员会定期听取商业道德相关审计发现，并指导审计工作深入开展。本行按照统一的审计整改工作管理办法，推动商业道德审计发现问题的整改落实，整改情况定期向董事会及其审计委员会汇报。通过上述机制，确保商业道德相关审计工作规范、闭环运行，持续提升本行商业道德风险管理水平。

Mechanism for Business Ethics Audits. The Bank has established and continuously refined the working mechanism for auditing business ethics matters. An annual internal audit plan covering business ethics issues is formulated, and relevant audit projects are implemented upon approval by the Bank's Party Committee and Board of Directors. The Board and its Audit Committee regularly review audit findings related to business ethics and guide the deepening of audit work. In accordance with the unified management measures for audit rectification, the Bank drives the implementation of corrective actions for issues identified in business ethics audits and regularly reports the rectification status to the Board and its Audit Committee. Through this mechanism, the Bank ensures the standardized, closed-loop management of business ethics-related audit activities and continuously enhances its overall level of business ethics risk management.

商业道德审计覆盖范围。本行定期开展操作风险和员工道德行为审计，重点关注风险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、控制等规范性；每年开展消费者权益保护审计，重点关注消保工作机制建设、客户信息保护、金融产品服务及收费、客户投诉处理等情况；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；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 conducted regular audits on operational risk and employee ethical behavior, with a focus on the adequacy and effectiveness of risk control measures, as well as the standardization of operational risk identification, assessment, monitoring, measurement, reporting, and control. We carried out annual consumer protection audits, focusing on the establishment of consumer protection mechanisms, customer information protection,, financial products, services, and fee structures, and customer complaint handling. Furthermore, we executed 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. In addition, annual economic responsibility audits were 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.

2025 年商业道德审计工作进展。2025 年，本行对 6 家境内一级分行开展了操作风险审计，审查了案件风险排查、疑点线索处置等要求落实情况，以及员工挪用资金、以贷谋私等员工行为问题管控情况；对 8 家境内一级分行开展了消费者权益保护审计，重点对客户信息保护、产品销售管理、第三方合作机构管理，以及第一、二道防线消保履职情况进行了审计；对 8 个总行部门和 8 家境内一级分行开展了反洗钱审计，关注了反洗钱客户身份识别、风险评估、反洗钱系统建设等情况；全年开展经济责任审计项目 81 个，涉及总行本部、35 家境内一级分行、5 家境外分行和 1 家综合化经营子公司，落实对领导人员廉洁从业、中央八项规定精神及党风廉政建设情况的审计监督。

Progress in Business Ethics Audit in 2025. In 2025, the Bank conducted operational risk audits at six domestic tier-1 branches, reviewing the implementation of requirements regarding case risk screening and the handling of suspicious leads, as well as the control measures for employee misconduct such as misappropriation of funds and using loans for personal gain. Consumer interests protection audits were performed at eight domestic tier-1 branches, with a focus on customer information protection, product sales management, oversight of third-party partner institutions, and the fulfillment of consumer protection responsibilities by the first and second lines of defense.AML audits were carried out across eight Head Office departments and eight domestic tier-1 branches, examining customer identity verification, risk assessment processes, and AML system construction. Additionally, the Bank executed 81 economic responsibility audit projects throughout the year, covering the Head Office, 35 domestic tier-1 branches, five overseas branches, and one comprehensive operating subsidiary. These audits implemented supervision over the integrity of leadership personnel in their duties, the implementation of the Spirit of the Central Eight-point Regulation, and the advancement of party conduct and clean government building.

2.巡视巡查监督

2.Inspection and Patrol Supervision

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 18 个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 regarded inspection and patrol work as a key lever for advancing comprehensive and strict governance of the Party and the Bank, and fully leveraged its supervisory role in business ethics across the Bank. In 2025, the Head Office conducted two rounds of inspections targeting 18 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 delved 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.