

Policy on Anti-Bribery and Anti-Duty Encroachment of China Minsheng Bank

The Bank strictly complies with the *Law of the People's Republic of China Against Unfair Competition*, the *Law of the People's Republic of China on Banking Regulation and Supervision* and other laws and regulations against bribery and duty encroachment, and has formulated the *Punitive Measures on Employees' Behaviors in Violation of Rules and Disciplines of China Minsheng Bank* (the "Measures"). The Measures clearly prescribes regulations in relation to anti-bribery and anti-duty encroachment, such as offering and accepting bribes, duty encroachment, etc., with the view of improving the regulatory and supervisory mechanisms and building a powerful fence against crimes.

I. Background for Formulating the Policy

The policy was formulated to further promote full and strict governance over the Party and over the Bank, emphasize disciplines and rules, regulate employees' behaviors, optimize and improve the accountability mechanism, as well as to urge employees to abide by laws and regulations, perform their duties in compliant manner, act responsibly, and be honest and self-disciplined, so as to provide robust support and guarantee for the healthy development of the Bank.

II. Main Content of the Policy

The Measures clearly specifies the rules and regulations against bribery and duty encroachment, and the corresponding accountability measures and procedures. With regard to behaviors violating rules for honest duty performance, the Measures highlights the following behaviors in violation of rules and disciplines: seeking benefits for oneself or others of specific relations by taking advantage of duty convenience and insider information, encroaching properties of the Bank or customers and conducting improper transactions or commercial bribery by taking advantage of occupational convenience, offering bribes to others, stealing, embezzling or

encroaching the Bank's or customers' funds, etc. With regard to behaviors violating professional conduct of employees and the rules for employee behavior management, the Measures highlights the behaviors violating rules and disciplines such as seeking illegal benefits by taking advantage of occupational and duty convenience, embezzling, and occupying, encroaching or damaging public properties.

III. Implementation of the Policy

The Bank strictly implements the policies and requirements in relation to anti-bribery and anti-duty encroachment, and seriously carries out investigation and hold it for accountability for behaviors violating relevant rules and disciplines. Those who are suspected of committing crimes will be transferred to the judicial authorities.