

商业道德（反腐败）政策要点

上海浦东发展银行（以下简称为“浦发银行”“我行”）恪守商业道德，严格按照商业道德标准和法律法规要求开展业务活动，一体推进“不敢腐、不能腐、不想腐”理念建设，对贿赂与腐败采取零容忍的态度，坚决筑牢合规经营与廉洁从业的防线。

一、适用范围

适用于浦发银行、附属机构及我行全体员工。包括我行董事会成员、高级管理人员、正式员工以及我行聘用或与劳务派遣机构签订协议的劳务派遣人员、退休返聘人员等与浦发银行工作相关的其他人员。此外，同时适用于我行一切业务活动，以及供应商、客户等全体业务伙伴。

二、监督与审计

为保障反腐败制度的有效实施和监督检查，浦发银行搭建了自上而下的反腐败管理架构，由案件防控工作领导小组牵头组织全行各单位开展腐败案件防控工作。此外，在各类常规审计、专项审计和责任审计中，关注商业道德、贿赂与腐败、员工异常行为等范围，加强商业道德领域的审计监督。

三、重点关注领域与管理要求

浦发银行聚焦资产聚集、资金密集、资源富集的重点业务领域，重点关注授信审批、资产管理、财富管理、招标采

购、选人用人、建设工程、第三方合作和机构产品准入等环节，坚决铲除腐败滋生的土壤和条件。

（一）员工行为管理与违规行为处理

浦发银行员工应当恪尽职守、廉洁自律，做到廉洁从业、廉洁用权，自觉抵制不正当交易行为，严格禁止贪污贿赂违法犯罪、利用职务之便或关系为本人或他人谋取私利、向政府机关及其他利害关系方提供贿赂或不当利益等行为。

一旦发现员工违反本制度的相关情况，浦发银行将立即采取措施制止不当行为、开展调查核实，依据行内制度规定开展内部问责或移送司法机关，并视情况开展通报和问题整改。

（二）供应商廉洁管理

将预防腐败作为集中采购工作的重要内容，严格执行国家法律法规及公司采购管理制度，供应商在入库时签署《供应商廉洁自律承诺函》，供应商在与浦发银行合作过程中，不得开展任何形式的贿赂和腐败行动，例如向浦发银行员工提供超出商业习惯允许范围内的礼品与款待等。

四、重点关注群体与工作要求

浦发银行反腐败制度重要关注群体包括授信工作人员、采购工作人员、全体党员及管理人员。授信工作人员须自觉贯彻执行国家有关经济、金融政策，严格遵守国家金融法律法规和浦发银行规章制度，忠于职守、爱岗敬业、务实高效、廉洁自律。采购工作人员严禁利用职权或者职务上的影响，

违规干预采购业务，索取或者收受供应商、利益相关单位或者个人提供的回扣、佣金、礼品等财物；严禁与供应商、利益相关单位或者个人发生非正常资金往来。全体党员及管理人员应发挥领导带动作用，在自身廉洁自律的同时引导员工学规知规，不越红线，坚决抵制贪污贿赂、侵害银行或客户利益等各类违纪违法违规行为。一旦发现身边员工异常行为，应及时纠正和上报。

五、管理机制

（一）问责调查与处理

员工如触犯反腐败相关规定涉及问责处理时，需主动配合问责调查，不得有故意隐瞒事实，拒绝配合调查，打击报复调查人，干扰、阻碍调查或隐匿、伪造、毁损证据的行为。员工对问责决定有异议的，有权按照正常渠道反映和申诉。

管理人员出现对员工腐败行为置之不理、瞒而不报的情况，需依据《上海浦东发展银行管理问责实施办法》对管理人员进行管理问责。

（二）反商业贿赂及反贪污培训

董事、高管和全体员工均需接受浦发银行开展的反商业贿赂及反贪污培训，提升职业素养和行为规范，维护公平、诚信、透明、廉洁的商业环境。各单位需定期或不定期组织开展案例通报和警示教育活动，将案件、典型违规事件作为警示教育主要内容，增强员工遵纪守法的合规理念以及防范案件的主动意识。

（三）反腐败举报与举报人保护

浦发银行鼓励员工及任何与浦发银行有业务关系的第三方举报贿赂和贪腐事件，建立了完善的举报人保护机制，禁止对举报人的打击报复。同时，浦发银行设置了畅通的信访举报渠道，规范设置信访接待场所、信访电话、电子邮箱，及时响应和回复信访人诉求。

Business Ethics (Anti-Bribery & Anti-Corruption)

Policy Overview

Shanghai Pudong Development Bank (hereinafter referred to as "SPD Bank" or "the Bank") is committed to upholding the standards of business ethics and conducting its operations in full compliance with applicable laws, regulations, and professional standards. The Bank takes a zero-tolerance approach to all forms of bribery and corruption, embedding the principles of "not daring to corrupt, not able to corrupt, and not wanting to corrupt" into its compliance culture, and strives to maintain a robust line of defence for ethical conduct and lawful operations.

1.Scope of Application

This Policy applies to SPD Bank's Head Office, all domestic and overseas affiliates, and all employees. This includes members of the Board of Directors, senior management, full time employees, contractors, re-employed retirees, and other individuals engaged in Bank-related work. It also extends to all business activities and applies to the Bank's business partners, including suppliers and customers.

2.Oversight and Audit

To ensure the effective implementation of this Policy, SPD Bank has established a top-down anti-corruption management structure. Anti-corruption oversight is carried out within the framework of risk prevention, with the Risk Prevention Leading Group coordinating efforts across the Bank. Furthermore, the Bank incorporates the review of business ethics, bribery and corruption, and abnormal employee conduct into routine, special, and accountability audits, thereby strengthening audit oversight in areas related to ethical

conduct.

3.Key Focus Areas and Management Requirements

SPD Bank focuses on key business areas characterised by asset concentration, high capital flows, and abundant resources. Priority attention is given to credit approval, asset management, wealth management, procurement and tendering, talents selection and appointment, infrastructure projects, third-party cooperation, and institutional product access. The Bank is committed to eliminating conditions conducive to the emergence of corruption.

3.1 Employee Conduct and Disciplinary Action

Employees are required to perform their duties with integrity, maintain ethical standards in their conduct and decision-making, and actively resist improper transactions. Any form of corruption, including embezzlement, bribery, abuse of authority for personal gain, or offering improper benefits to government bodies or other stakeholders, is strictly prohibited.

Any violation of this Policy by an employee will trigger immediate intervention and investigation. SPD Bank will pursue internal accountability in accordance with internal procedures, or refer the matter to judicial authorities where applicable. Depending on the circumstances, the Bank may issue internal circulars and mandate corrective actions.

3.2 Supplier Integrity Management

Anti-corruption principles are integral to the Bank's centralised procurement processes. All procurement activities must comply with relevant laws, regulations, and the Bank's procurement policies. Suppliers are required to sign a *Supplier Integrity and Self-Discipline Commitment Letter* upon registration. During the course of cooperation, they must not engage in any form of bribery or corruption, such as offering gifts or hospitality that fall outside acceptable business norms.

4.Key Groups and Requirements

This Policy places particular emphasis on credit approval staff, procurement staff, Party members, and management. Credit approval staff must faithfully implement national economic and financial policies, comply with legal and regulatory requirements, the Bank's policies, and maintain professionalism, diligence, and integrity in their duties. Procurement personnel are strictly prohibited from using their position or influence to interfere with procurement decisions, and from soliciting or accepting kickbacks, commissions, gifts, or other benefits from suppliers or related parties. They must not engage in irregular financial dealings with external stakeholders.

All Party members and management shall play a leading and exemplary role in fostering a culture of integrity across the Bank. They must actively guide employees to understand and follow rules, avoid disciplinary violations, and firmly reject behaviours such as bribery, embezzlement, or misconduct that harms the interests of Bank or its customers. Any signs of abnormal behaviour by colleagues must be promptly addressed and reported.

5. Governance Mechanisms

5.1 Accountability and Investigations

Employees subject to investigation for breaching anti-corruption rules must fully cooperate with the process. It is strictly prohibited to conceal facts, obstruct investigations, retaliate against investigators, interfere with proceedings, or tamper with evidence. Employees have the right to file appeals through appropriate internal channels if they disagree with disciplinary outcomes.

Managers who fail to report, or deliberately conceal, instances of corruption will be held accountable in accordance with the *SPD Bank Implementation Measures for Management Accountability*.

5.2 Anti-Bribery and Anti-Corruption Training

All directors, supervisors, senior management and employees must participate in anti-bribery and anti-corruption training programs organised by the Bank. These aim to strengthen professional ethics,

promote compliance awareness, and foster a fair, transparent, and honest business environment. Departments shall organise regular and situationally necessary compliance briefings and disciplinary warning sessions, drawing on actual misconduct cases as core materials for education and awareness-raising.

5.3 Whistleblowing and Whistleblower Protection

SPD Bank encourages employees and third parties with business ties to the Bank to report suspected cases of bribery or corruption. A robust whistleblower protection mechanism is in place, and any form of retaliation is strictly prohibited. The Bank provides multiple reporting channels, including designated reception areas, hotlines, and email addresses, to ensure timely and appropriate responses to all reports.