

Summary of Anti-Bribery and Anti-Corruption System of CRRC Corporation Limited

I. General Principles and Requirements

CRRC Corporation Limited (hereinafter referred to as "CRRC") is a public company listed on the Shanghai Stock Exchange (601398). It is committed to the highest standards of integrity and ethical conduct, and has established a comprehensive Anti-Bribery and Anti-Corruption (ABAC) system to ensure compliance with applicable laws and regulations, including the United Kingdom Bribery Act 2010, the FCPA, and the PCA.

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The e e a d he C a a d b d a e a
a e e a d gade . The a age e f e e g a d c g
c e c a b be f he c e f fed eade h ,
h e a ch ca e b , gh ga a , a d c che e
g e a ce.

II. Policy Focus and Requirements

(I) Appointment and Removal of Personnel

The C a ha ade cea e e e f e a e' ec a a d
ec a , a d e g he e a e a d cea g e a ce.
A e f a h f f e ce f e e a ga
e e a a ge e f fa e be c e e e a e
c h b ed. E ee a e bec g e e a d
a e e he a d e a e e ce e ee a
e a d e e a f f e a d ee
a .

(II) Business Rules of the Company

A f he f g beha a e h b ed a f he
C a e e a b e ac e :
1. V a g eg a b g g e e g ca h e he
f f g f he he a ' e a ed e e ;
2. R a

he f a c a be ef b g g e he a e fd a ;

3. Offe g c e c a h a d he ac e
ha a e he c e ffa c e ;

4. P d g a e be h ca d , c ca d
(c), h g ca d (c) a d he eg ab e ec e ;

5. P d g g e cha h e a d ca ;

6. Offe g c d de d ;

7. G g ece g e he be ef h gh ga b g,
a e a de he g e f a , b c , ad e g, a g,
c a c , ad , ech ca e ce, ce fc e ea ch a d c ca
fee , e c;

8. O he a f a a d eg a .

III. Regulatory Mechanism

(I) Organizational Guarantee

The C a eg a c d c a -c a e e
de f a d a e b e c he C a ' b e
ac e . The C a a e a a e eg a a d e
ea e ga e he e . The e ea e a c de b a e
ed :

1. C d c d e d ge ce e b e a e a d a e ;

2. I e e add a e e a d e f h gh-
b e ac e ;

3. Regulate the behavior of the Company's employees and
conduct the investigation;

(II) Integrity Culture Education

The Company has formulated the integrity culture
guidelines, conduct integrity education and
conduct the investigation, the employees are
familiar with the integrity culture. Ne-
cessary measures are taken to ensure the
conduct of the investigation.

(III) Employees Behavior Management

The Company has established the
behavior management system and
conduct the investigation. Measures are
taken to ensure the behavior management
system is effective.

(IV) Impeach and Accuse

The Company has established the
behavior management system and
conduct the investigation. Measures are
taken to ensure the behavior management
system is effective.

IV. Record and Document Management

The C a e e he c e e e , acc ac , a d e e f a e e a ec d a d d c e e a ed b e a ac a d ac e . Rec d a e eg a e e ed e e c a ce h e a c e e e a d e e a eg a a da d .

The C a e ab he a d a a a d c e a age e e f g a a ec d a d d c e . The d c e ha be e acc d g he e e e d a ed b e e a a a d eg a a d he C a c e . Whe ece a , he C a ab e c e e e a d de e e a d c e e a a d , eg a ec , a d ega ga .

V. Policy Updates and Communication

The C a eg a e e a -c c , a ea ce a ea , e e c e h he a e a , eg a a d be ac ce . The C a c de he f d g a d ec e da f e a a d , c a ce a e e a d e e a eg a cha ge d g he e e ce . E ee a d e e ed a e a e e c aged de feedbac he de f e a h c g a d a ea f e e ce a d ced e .