

## 評級業務防火牆制度

## Rating Service Firewall Policy

**第一條** 為建設公司優秀的評級文化，確保評級過程和評級結果的獨立、客觀、公正，制定本制度。

**第二條** 評級部門和公司其他部門在組織和人員上應相互獨立。

**第三條** 評級分析師負責對受評對象的調查分析、撰寫評級報告和推薦評級結果；評審委員會負責對評級結果進行評定和報告評審。

**第四條** 分析師在參與評級項目前應向公司申報個人持有證券及其他可能存在利益衝突的投資及收入的情況。

**第五條** 分析師在從事評級業務時，應遵循獨立、客觀、公正的原則。

**第六條** 非評級相關人員不得以任何可能的方式影響分析師的獨立性。非評級相關人員指不參與評級和評審過程的市場部門人員、公司董事、監事及其他高級管理人員或行政管理人員。

**第七條** 公司在其他制度的建立和設計上要確保評級部門的獨立性和公正性。

**第八條** 分析師和評審委員會委員不得參與評級業務談判、業務協議簽訂和評級收費工作，其考核與薪酬體系不以與本人負責或接觸的受評對象支付的評級費用為基準。

**第九條** 參與結構性金融產品評級的人員，不得就該產品的設計提出建議或意見。

1. This policy aims to ensure the independence, objectivity and impartiality of the rating process and rating results, and to build a good rating culture.

2. The Rating Department should be independent of other departments of the Company in organization and personnel.

3. Analysts are responsible for studying and analysing the rating entity, writing rating reports, and recommending rating results; the Rating Committee is responsible for assessing and reviewing the rating results.

4. Before participating in the rating project, the analyst should report to the Company about the situation of conflicts of interest, including personal holdings of securities and other investments and income that may cause the conflicts of interest.

5. Analysts should follow the principles of independence, objectivity and impartiality when engaging in rating services.

6. Personnel who do not engage in the rating process should not affect the independence of analysts in any way. Personnel who do not engage in the rating process refer to the Business Department personnel, directors, supervisors and other senior managers or administrative personnel who do not participate in the rating and review process.

7. The establishment and design of other policies should ensure the independence and impartiality of the Rating Department.

8. The analyst and rating committee members are not allowed to participate in the business negotiations, the signing of the engagement letter, or payments. The assessment and compensation should not be based on the rating fees paid by the rating entity under their responsibility or contact.

9. The employee who involves in the rating process of structured finance products should not make proposals or recommendations regarding the design of the product.

第十條 公司負責人員（以下簡稱“RO”）和合規官應及時制定和解釋相關制度並應積極採取措施保持和促進評審委員的獨立性。

第十一條 出席評審會的委員須在會前向評審委員會申報可能存在利益衝突的投資及收入的情況。

第十二條 每次參加評審委員會的委員名單由 RO 確定，相關人員負有對委員名單保密的義務。

第十三條 評審委員會結束後，應根據公司有關制度公布評級結果，但不得公布具體評委的投票情況。

第十四條 任何機構或個人不得干預評審委員會的工作。

第十五條 任何機構或個人不得打聽或影響參與評審會議委員的投票意向。

第十六條 除了評級委托關係以外，參與整個評級過程的評級人員、評審委員、市場部門人員以及公司主要管理人員不得與受評對象有其他任何業務關係或可能引起利益衝突的關係。

第十七條 非評級相關人員不得打聽或調閱客戶的相關評級資料。

第十八條 本制度采用双语格式撰写，如果中文条款与英文条款之间存在任何差异或不一致，应始终以中文条款为准。

10. The Responsible Officer (hereinafter “RO”) and the compliance officer should develop and interpret the relevant policies in time and should take active measures to maintain and promote the independence of the committee members.

11. The committee members attending the meeting should report to the committee before the meeting about the investment and income of potential conflicts of interest.

12. The list of members attending the committee meeting is determined by the RO, and the relevant personnel have the obligation to confidentiality on the list of members.

13. After the conclusion of the Committee meeting, the rating results should be published according to the relevant policies of the Company, but the voting of the specific committee members should not be published.

14. No organization or individual is allowed to interfere in the work of the committee.

15. No organization or individual is allowed to inquire about or affect the voting intentions of committee members attending the meeting.

16. In addition to the rating entrustment relationship, the employees participating in the rating process, including the committee members, the Business Departments personnel and the main managers of the Company should not have any other business relationships or any relationships that may cause conflicts of interest with the rating entity.

17. Personnel who do not engage in the rating process should not inquire or access the relevant rating information of the customer.

18. This policy is written in bilingual format. The Chinese terms shall always prevail in case of any discrepancy or inconsistency between Chinese terms and its English translation.