

RECORD-KEEPING POLICY

檔案管理制度

總則

第一條 為促進公司檔案工作的規範化、制度化、科學化，進一步規範公司評級業務檔案管理工作，提高評級業務檔案管理水準，根據《證券及期貨條例》、《證券及期貨（備存記錄）規則》、《提供信貸評級服務人士的操守準則》等相關法例、規則、準則，結合中証鵬元國際評級有限公司（“公司”）實際情況，制定本制度。

第二條 本制度所稱檔案是指在工作中形成的具有保存價值的文字、圖表、聲像、計算器磁片、實物等各種形式的歷史記錄，包括文書檔案、照片檔案、影像檔案、電子檔案、實物檔案和專門業務檔案。公司開展的各類評級業務均適用於本制度。

第三條 公司對非評級相關檔案實行集中管理。非評級相關部門在工作過程中形成的文書、照片、影像、電子、實物檔案、專門業務檔案等，應按照集中管理的原則，集中按類別分庫保存，確保檔案完整、真實、準確、安全、保密、可識別和有效利用。

第四條 評級業務檔案由評級部門指定人員進行管理。被指定人員對評級業務檔案負有保密義務，不得向他人泄露檔案內容，按本制度辦理借閱手續的除外。

第五條 所有員工必須確保檔案完整、真實、準確、安全、保密、可識別和有效利用，對在公務活動中形成的各種檔案資料，應按檔案管理制度的規定歸檔，任何個人不得據為己有，更不得拒絕歸檔。各部門對在檔案工作中做出突出貢獻

General rules

1. This policy aims to promote the standardization, institutionalization and optimization of the company's archival works, to further harmonize the management of the company's rating archives and to improve the rating files management, in compliance with the *Securities and Futures Ordinance*, *Securities and Futures (Keeping of Records) Rules*, and *Code of Conduct for Persons Providing Credit Rating Services* and other relevant laws and regulations, applicable to CSPI Credit Ratings Company Limited ("Company").

2. The archives specified in this policy refer to a collection of all historical records in various forms of writing, charts, audiovisual images, computer disks and objects, including documents, photo files, image files, electronic files, physical files and specialized business files, which are formed during the work of the Company. This policy is applicable to all business lines of the Company.

3. The Company implemented a centralized management system for non-rating related archives. The documents, photographs, images, electronic files, physical files and specialized business files of non-rating related departments should be kept in accordance with the principle of centralized management, and in accordance with the established classifications to ensure that all archives are complete, authentic, accurate, safe, confidential, identifiable and efficient.

4. The rating archives are managed by the designated personnel of the rating department. The designated personnel must keep archive confidential, except for when archives are borrowed in accordance with this policy.

5. All employees of the Company must ensure that relevant archives are complete, authentic, accurate, safe, confidential, identifiable and efficient, and shall archive various materials in the course of business in accordance with provisions of the Record Keeping Policy, and no

的人員，公司應給予表彰和獎勵；對損毀、丟失、塗改、抄錄、擅自公佈和銷毀檔案的，公司應視情節輕重給予處罰；對偽造或擅自提供、出賣檔案構成犯罪的，應移交司法機關處理。

individual shall use any Company's documents as his/her own, and/or refuse to archive it. The company shall reward any person for outstanding archival work; the Company shall initiate disciplinary action against a person who causes damage, loss, and/or alteration, and/or makes an unauthorized copy/ publication and/or destruction of archives; If an activity has constituted a forgery or unauthorized access and sale of archives, the case shall be transferred to the law enforcement authorities for investigation.

檔案種類及管理

Types of Rating Archives and its Governance

第六條 評審會檔案包括：

- (一) 進行評級分析、出具評級報告所依據的資料；
- (二) 工作底稿以及在評級過程中形成、調整、撤銷級別所產生的記錄；
- (三) 評審會議資料；
- (四) 評級報告；
- (五) 評級過程中產生的內部控制記錄；
- (六) 評級過程中產生的其他書面記錄。

6. The Rating Committee files include:

- I. Materials used in the process of rating analysis and writing rating reports.
- II. Working papers and records generated during the rating process as a result of the initiation, revision, and withdrawal of ratings.
- III. Rating Committee materials.
- IV. Rating reports.
- V. Internal control records generated in the rating process.
- VI. Other written records produced in the rating process.

第七條 方法模型評審會檔案包括：

- (一) 評級方法和模型；
- (二) 構建方法模型所依據的資料；
- (三) 其他經方法評審會確定的相關檔。

7. The Methodology Committee files include:

- I. Rating criteria and models.
- II. Materials used to develop rating criteria and models.
- III. Other relevant documents approved by the Methodology Committee.

第八條 評級業務檔案應採用中文或英文書面或電子方式保存。

8. The rating files should be kept in paper-based or electronical form in Chinese or English.

第九條 評級業務檔案實行保密管理。

9. The rating archives shall be kept confidential.

評審會存檔完成

Completion of Committee archives

第十條 評審會秘書在評審會議結束後對評審會議資料存檔。負責人員（“RO”）指定專人保存評審會議統計表格，並在月初把上個月評審會議統計情況發送給所有 RO 及合規部。

10. The Committee secretary shall save the Committee documents after the Committee. The designated personnel appointed by a Responsible Officer (“RO”) shall keep the statistical form of the Committees, and sends a notice to all ROs and compliance department at the beginning of each month regarding the status of filing of the Committees of previous month.

檔案資料的保管

Storage of Archival Data

第十一條 評級業務檔案保存期限不少於 7 年，證券類評級業務檔案應保存至受評證券存續期滿後 7 年或評級合同期滿後 7 年，以較後者為準（“保存期”）。

11. All rating archives shall be kept for no less than 7 years after the expiry of evaluated securities or after the expiry of the rating engagement, whichever is later (“Retention Period”).

第十二條 各部門應對庫存檔案定期進行檢查，及時發現、解決問題並報告。

12. Relevant departments should regularly carry out inspections of archives, and should spot, troubleshoot and report problems in a timely manner.

第十三條 紙質檔案應放置於專門的場所。檔案存放場所應配備儲物櫃，並確保防盜、防污染、防塵、防潮及防止不當使用等，公司內嚴禁吸煙。檔案存放場所要保持整潔、乾淨、有條理。

13. Paper archives should be placed in designated areas. File storages must be equipped with lockers and ensure reasonable protection from theft, pollution, dust, moisture, and misuse. Smoking is strictly prohibited in all premises of the Company. Archives must be kept neat, clean, and organized.

檔案資料的借閱與利用

Borrowing and Utilization of Archives

第十四條 僅限以下人員以評級、評審或合規工作為目的借閱評級業務檔案：

14. Only the following persons can borrow the rating files for the purpose of rating, review or compliance:

(一) RO、相關評審委員會主任、合規專員；

I. A RO, a Chair of the rating committee or a compliance officer;

(二) 受評專案分析師（含初次、跟蹤及同一主體其他評級工作），但須經 RO 書面批准；

II. Analysts of the rating projects (including initial ratings, surveillance ratings and other rating

projects of the same rating target) upon a written approval of a RO.

(三) 受評項目評委，但須經相關評審委員會主任書面批准。

III. Committee members upon a written approval of the rating committee chair.

(四) 經 RO 書面批准的公司其他人員。

IV. Other staff upon the written approval of a RO.

第十五條 借閱人員不得將評級業務檔案轉借他人。

15. Borrowers shall not lend or share rating files with others.

第十六條 檔案管理人員和借閱人員不得利用評級業務檔案中的機密資訊，操控本人及其配偶、伴侶、未成年子女的帳戶或受本人實際控制的其他帳戶，買賣公司所評級證券或受評級實體的股份。

16. No one shall use confidential information contained in the rating files to engage in transactions in shares of rated securities or entities through the accounts of the borrowers' spouse, partner, minor children, or any account controlled by them.

檔案資料的鑒定和銷毀

Identification and Destruction of Archives

第十七條 評級業務檔案在保存期限滿後可銷毀，銷毀前須經檔案相關部門負責人和 RO 鑒定與確認。未通過銷毀鑒定與確認的檔案應延長保存期限，延長期限由評級部門負責人和 RO 確定。

17. Rating archives can be destroyed after the expiry of Retention Period. Before destruction, the archived documents must be identified and confirmed by the relevant department heads and an RO. Any files that have not been confirmed for destruction shall be retained for a longer period of time, determined by the head of the rating department and an RO.

罰則

Penalties

第十八條 有下列行為之一的，公司視情節嚴重程度，對直接主管人員和直接責任人員給予警告、書面批評、至辭退的處分：

18. For any of the following circumstances, depending on the severity of the situation, the Company shall initiate disciplinary action including but not limited to a warning, criticism in a circulated notice, or even dismissal:

(一) 將評級業務過程中形成的應歸檔資料據為己有或挪為他用，拒不按照公司規定向檔案管理人員移交檔案的；

I. Refusing to transfer relevant files to archive personnel in accordance with the Company's policy, using the archived materials as a personal property or embezzling it for other purposes;

(二) 捏造、塗改、擅自複印、抄錄、抽拿、泄露和銷毀檔案的；

II. Fabricating, altering, making unauthorized copies and transcripts, extracts, leaking out or destroying the documents;

(三) 因未妥善保管而造成檔案損毀或丟失的。

III. Damaging or losing documents due to improper safekeeping.

第十九條 任何人員發現有第十八條第（一）、（二）、（三）款所述行為的，應向合規專員報告。

19. Any person who commits any activities as described in articles 18(I), (II), (III), shall be reported to the compliance officer.