

## 风险管理与内部控制

## RISK MANAGEMENT AND INTERNAL CONTROL

### 风险管理

### Risk Management

**全面风险管理。**2024年，本行进一步完善风险偏好指标体系，提升风险偏好管理能力，加强风险偏好执行情况监测，切实发挥风险偏好对风险管理的宏观导向和引领作用。对标监管要求，结合全行风险管控特点，优化全面风险管理评价考核方案，引导经营单位严控增量风险、加强事前防范。通过风险条线资格认证，促进风险管理岗从业人员不断提升业务能力和专业水平，巩固提升全行风险条线垂直管理质效。

**信用风险、市场风险、操作风险管理。**2024年，本行持续推动统一授信风险并表管理，从银行集团层面加强授信业务集中管控，秉持审慎管理原则制定一系列支持特殊政策的授权举措，提高授信业务审批授权精细化管理水平。完善估值体系建设，探索建立自贸区外汇市场风险限额监测体系，开展市场风险资本新规实施项目，构建符合监管要求的市场风险新标准法。对标监管新规优化操作风险管理制度体系，完善管理机制，依托操作风险自评估、关键风险指标、损失数据库、压力测试等操作风险管理工具，深入开展操作风险识别、评估、计量、监测、控制、缓释、报告等全流程管理工作，提升操作风险管理效能。

**洗钱风险、流动性风险、国别风险管理。**2024年，本行践行“风险为本”理念，进一步健全反洗钱管理组织架构，持续完善洗钱风险管理机制，强化基础管理，夯实反洗钱义务履行根基，不断提高反洗钱信息化支持能力，提升精细化管理水平。坚持资产负债匹配管理原则，动态监控市场流动性状况和本行现金流缺口情况，统筹平衡资金来源与运用，采取多种工具持续监测流动性风险状况，确保流动性储备合理适度，流动性运行平稳安全。落实落细监管机构最新国别风险管理要求，进一步完善本行国别风险管理制度体系，优化国别风险评级模型，持续跟踪重点国别风险变化趋势，提升国别风险管理质效。

**风险分类管理。**2024年，本行推行董事会总体引领、高级管理层有力推进、相关部门协同管理、经营单位稳步实施的风险分类管理架构，按季对金融资产进行风险分类重检，有序对存量业务按监管要求进行重新分类，持续巩固提升分类结果的前瞻性、准确性。

**资产质量管理。**2024年末，全行不良贷款率1.03%，较年初下降0.15个百分点，处于本行历史较低水平，资产质量保持稳中向好的态势。积极主动防范增量风险，加强对潜在风险项目的常态化监测和风险评估，前瞻性开展风险排查，完善典型案例通报机制，厚植风险文化。统筹推进存量风险处置，聚焦重点风险领域、重点经营单位、重大风险项目持续发力，优化巡回督导机制，持续发挥好总行风险化解的督导及统筹协调作用。持续夯实管理基础，对标监管要求进一步完善风险管理制度体系，健全风险监测和授信业务风险突发事件应急处置机制，优化减值测算模型，推动本行信贷资产减值损失评估质量提升。

**Comprehensive Risk Management.** In 2024, the Bank further refined its risk appetite indicators, enhanced the risk appetite management capabilities, and strengthened the monitoring of risk appetite enforcement, ensuring the guiding and leading role of risk appetite in risk management. In accordance with regulatory requirements and its risk management characteristics, the Bank optimized the plan on evaluation and assessment of comprehensive risk management, and guided its business units in controlling incremental risks and strengthening prevention efforts. Through the recognition of professional qualifications, the Bank encouraged its risk management team to continuously improve their skills and expertise so as to consolidate and enhance the effectiveness of vertical management in risk oversight.

**Credit, Market and Operational Risks Management.** In 2024, the Bank actively promoted the unified management of credit line risks, strengthened the collective management of credit lines at the head office, and formulated a series of authorization measures in support of special policies based on prudent management principles, so as to enhance meticulous management of credit line approval and authorization. The Bank improved its valuation system, explored the establishment of a monitoring system for foreign exchange market risk quotas in free trade zones, carried out projects to implement new market risk capital rules, and developed a revised standardized approach to market risk that complies with regulatory requirements. The Bank optimized its operational risk management policies and systems in accordance with the new regulatory requirements. With the help of risk management tools such as operational risk self-assessment, key risk indicators, a loss database and stress testing, the Bank managed the entire process of operational risk identification, assessment, measurement, monitoring, control, mitigation and reporting to improve the quality and efficiency of operational risk management.

**Money Laundering Risk, Liquidity Risk and Country-specific Risk.** In 2024, the Bank followed a risk-based approach, improved the anti-money laundering (AML) management structure and the money laundering risk management mechanism, strengthened the basic management and the foundation for the implementation of AML obligations, and scaled up IT application in support of AML to enhance meticulous management. Adhering to the principle of coordination between assets and liabilities, the Bank monitored the market liquidity conditions and its liquidity gap, balanced the sources and utilization of funds, and adopted various tools for monitoring liquidity risks to ensure reasonable and adequate reserves for sound liquidity. The Bank fully implemented the latest regulatory requirements on country-specific risk management, optimized related policies and rating models, and tracked changes in risks associated with key countries to enhance the quality and efficiency of its country-specific risk management efforts.

**Risk Classification Management.** In 2024, the Bank implemented a risk classification management framework featuring overall leadership of the Board of Directors, strong support from senior management, cross-departmental collaboration, and steady execution by business units. The Bank conducted quarterly reevaluation of the risk classifications of its financial assets, and reclassified the existing business in an orderly manner according to regulatory requirements to ensure forward-looking and accurate classification outcomes.

**Asset Quality Management.** At the end of 2024, the Bank's NPL ratio was 1.03%, down by 0.15 percentage points from the beginning of the year and stood at a historically low level, demonstrating a steady improvement in asset quality. The Bank proactively prevented incremental risks through strengthened regular monitoring and assessment of potentially risky projects, forward-looking risk identification, and improved typical case reporting mechanisms to foster a risk culture. The Bank promoted the disposal of existing risks by focusing on key risk areas, key business units and major risk projects, optimizing the risk supervision mechanism, and leveraging the supervisory and coordinating role of the head office in risk mitigation. To strengthen the management foundation, the Bank upgraded its risk management policies to align with regulatory requirements, promoted risk monitoring and emergency response for credit risks, and refined the impairment calculation model to improve the assessment quality of credit asset impairment losses.

## 内部控制与合规经营 Internal Control and Compliance

2024年，本行多管齐下持续提升内控合规管理效能。紧盯本行内控管理薄弱环节、重要问题和重点单位，剖析问题症结，推动从制度和机制上开展根源性整改，确保内部控制体系设计有效、执行有力。优化案防体制机制，构建全链条案防工作体系，提升案件风险排查和检查有效性，强化员工行为管理，推动案防关口前移，形成联防联控工作格局，持续强化全行案防治理能力。不断健全规章制度体系，推广应用“制度树”成果，对标最新监管要求和行内业务发展需要，强化内外规衔接。聚焦重点风险领域与薄弱环节，开展主要业务条线“上对下”现场检查，压实整改和责任追究，进一步提高现场检查有效性，强化条线部门管合规、管监督、管追责问责的主体责任。完善本行追责问责制度，坚持严字当头，做到失职必问、问责必严。

本行不断完善关联交易管理制度，优化管理机制，按照穿透原则动态认定、更新关联方名单，持续抓好关联交易全流程管理，严格履行信息披露义务，强化监督考核和数据治理，加快推进系统优化，切实防范关联交易风险。本行关联交易均遵循商业原则，交易价格公允。除免于按照关联交易方式披露的交易外，2024年本行共发生需披露的一般关联交易25.34亿元（以人民币计，外币已折算为人民币），为授信、存款类关联交易，未发生重大关联交易。



In 2024, the Bank took a multi-pronged approach to continuously improve the efficiency of internal control and compliance management. Focusing on the weak links, important issues and key business units related to internal control management, the Bank identified the root causes of problems and initiated corrective actions in both policies and mechanisms to ensure that the internal control system is designed and implemented efficiently. To optimize the system of financial crime prevention, the Bank built a comprehensive mechanism that addresses the entire chain of financial crime prevention. This approach aimed to improve risk investigation and inspection efficiency. The Bank also adopted a proactive strategy for risk prevention and mitigation by strengthening the management of employee behavior, and formed a pattern of collaborative prevention and control to continuously increase the overall capacity for forestalling and controlling financial crime risks. The Bank improved its regulatory framework by promoting the application of a “regulation tree”, and forged greater synergy between internal and external regulations to meet the latest regulatory requirements and the Bank’s development needs. Targeting key risk areas and weak links, the Bank carried out on-site supervisory inspections of major business lines and worked strictly on rectification and accountability, strengthening the effectiveness of on-site inspections and clarifying the responsibilities of departments in charge of business lines for compliance, supervision and accountability. The Bank improved its accountability system with a strictest disciplinary approach, ensuring that negligence is consistently investigated and accountability is enforced without exception.

The Bank continuously improved its policies and mechanisms for connected transaction management by dynamically identifying and updating the list of related parties based on a look-through principle, implementing the end-to-end management of connected transactions, strictly fulfilling information disclosure obligations, enhancing supervision and assessment as well as data governance, and accelerating system optimization. In doing so, risks associated with connected transactions were effectively prevented. The Bank operated under commercial principles for connected transactions, ensuring that they were fairly priced. Apart from transactions exempt from disclosure, the Bank had a total of RMB2.534 billion of connected transactions that met disclosure requirements in 2024, which were credit line and deposit-related activities, as well as transactions of other types. No significant connected transactions took place during this period.

