

Modern Slavery Act Statement 2023

CITIC Securities International Company Limited

April 2024

Introduction

This Statement is being published in accordance with Section 54 of the UK Modern Slavery Act 2015 for the financial year ending December 2023. It outlines the steps that CITIC Securities International Company Limited and its subsidiaries ("CSI") has taken during the year to ensure that modern slavery and human trafficking is not taking place in our supply chain or any part of our business, as well as future plans in this regard. This Statement applies to CSI's global operations and supply chains.

CSI is committed to supporting the protection and advancement of human rights in our business and supply chains. We have a zero tolerance approach to modern slavery and human trafficking in all its forms.

Our Business

CSI is a global brokerage and investment group. Headquartered in Hong Kong, CSI's global network spans locations across Asia, Australia, Europe and the United States. Renowned for presenting differentiated investment ideas, we work closely with asset managers, corporates, governments and family offices to provide financial services. Through our parent company, CITIC Securities Company Limited, we have unrivalled access to China for corporate finance, capital markets and investment opportunities. We leverage out-bound capital flows and assist global investors in navigating China's capital markets. CSI's staff of some 2,000 individuals define our culture of excellence, innovation, integrity, inclusion and celebration.

A robust approach to governance and risk guide our principles and corporate culture. Our governance is reinforced through CSI's business principles, corporate governance framework, compliance, risk management, product and technology innovation, client engagement, staff training, diversity and inclusion.

As a financial services provider, CSI predominantly employs professionally qualified and highly skilled staff. As such we consider the risk of modern slavery and human trafficking within our own business to be low.

Our Approach

CSI's approach towards the ensuring that modern slavery is not taking place in our business or supply chain is reflected in a number of policies and practices.

Policies

CSI's Employee Handbook and Employment legislation

The Employee Handbook sets out CSI's approach towards its staff. CSI is an equal opportunities employer and is committed to providing equal opportunities throughout employment including in the recruitment, training and development of employees. CSI aims to ensure that it will not unlawfully discriminate against job applicants, employees of the company, workers or contract workers on the grounds of their age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race (which includes colour, nationality and ethnic or national origins), religion or belief, sex or sexual orientation (the protected characteristics).

It is, therefore, CSI's policy to make every effort to provide a working environment free from harassment, intimidation and discrimination which the Company considers unacceptable behaviour. All employees are required to attest to the CSI Code of Conduct on an annual basis.

The Employee Handbook CSI takes account of the specific employment legislation in each of the jurisdictions in which it operates and reviews these requirements on an ongoing basis

Code of conduct

The CSI Code of Conduct provides advice and guidance on how we should conduct business, ethically, and in accordance with all applicable laws and regulations. The Code is not an exhaustive set of rules but rather a set of guiding principles. All employees are required to attest to the CSI Code of Conduct on an annual basis.

Anti-Money Laundering and Prevention of Terrorist Financing Policy

CSI's Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT) applies to all its staff and representatives and sets out the firm's policies and procedures to prevent the occurrence of financial crimes and the movement of money which has derived from the proceeds of any crime. CSI's policy is to actively prevent money laundering, tax evasion and terrorist financing and any activity that might facilitate these crimes, whilst conducting its business in line with all applicable AML/CFT laws and high ethical standards across all jurisdictions, and where possible and practicable obliging client's confidentiality and data protection.

Anti-Bribery and Corruption Policy

Bribery and corruption are serious crimes which undermine the rule of law, lead to injustice and can adversely impact economic development. These activities threaten good governance, sustainable development and fair business practice. CSI is committed to ensuring that persons or entities associated with CSI do not attempt to obtain or retain business for CSI in an unlawful manner. In particular, CSI seeks to prevent any person or entity associated with it from undertaking any conduct that may be construed as giving or offering bribes with a view to obtaining or retaining business or any other advantage for CSI. The objective of this policy is to ensure that CSI complies with all applicable laws and regulations to protect the reputation of the firm.

Whistleblowing Policy

CSI's Whistleblowing Policy relates to complaints or reports regarding actual or potential misconduct or wrongdoing involving a violation of laws, regulations, codes of conduct, internal policies or procedures (whether such violation has occurred, is occurring or is likely to occur), any attempt to conceal, or deliberate concealment of, any such violation, possible fraud, deception, theft, forgery or corruption, actions which are unprofessional, inappropriate or in conflict with a general understanding of what is right and wrong and any other matter deemed to be unethical or detrimental to the reputation of CSI.

CSI also has a global Speak-Up hotline providing employees with a mechanism to report concerns regarding potentially unlawful, improper or questionable conduct, including with regard to vendors or third parties.

Supply Chain and Due Diligence Process

CSI's supply chain relates to our global financial services business and includes the supply of personnel, and goods and services to support the services that we in turn provide to our clients and staff. The services provided to us include, amongst others, cleaning, catering, security and printing services, professional services such as accountancy, tax, regulatory, insurance and legal advice, and premises and technology (systems, software and hardware equipment, including telecommunications services) and travel services.

CSI's vendor due diligence process uses a risk based assessment approach encompassing screening reviews of public records including a review of significant litigation and regulatory actions and negative news stories. This

assessment screens for, amongst other things, potential risks associated with modern slavery and human trafficking. Where appropriate, issues identified would be escalated to senior management and where necessary we would take appropriate action which may include terminating a contract with a vendor.

Training

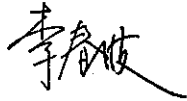
In 2023, CSI included an overview of Modern Slavery requirements in a mandatory online Financial Crime training course for all its staff globally in order to increase awareness of this topic for all our employees. This training will be repeated annually.

Ongoing Plans

In the 2024 financial year, CSI will continue to review its relationships with its third party suppliers and any vendors that have any modern slavery risks will be reviewed and addresses as necessary. We will continue to train our staff on modern slavery issues and continue to enhance our policies and procedures to highlight and help our staff to identify potential modern slavery issues and bring them to the attention of their supervisors and senior management. Any gaps found in our approach to modern slavery will be addressed with oversight of senior management of the firm.

This statement has been approved by the CITIC Securities International Company Limited Board of Directors in April 2024.

Signed by:



LI Chunbo

Chairman