

Complaints Management Policy

1. Purpose and scope

Ensuring and protection of the interests of customers and potential customers have a high priority for Industrial and Commercial Bank of China Limited, Frankfurt Branch (hereinafter referred to as "ICBC Frankfurt"). This includes dealing with complaints from potential customers as well. Complaints are any expression of dissatisfaction expressed by a natural or legal person (complainant) in connection with banking services of ICBC Frankfurt.

2. Principles

Complaints management bases on the following principles: protection of customer interests, solution without conflicts of interests, fast complaint handling, transparent decisions.

ICBC Frankfurt has set up an appropriate and effective complaint management system for implementation of these principles. All customers or potential customers can file a complaint.

All persons involved in or having knowledge of the complaint procedure are obliged to maintain confidentiality towards third parties.

3. Responsibility and organization

The management is responsible for the decision, implementation and monitoring of the complaint handling procedures and compliance with this policy. This policy also includes the requirements of BaFin Circular 06/2018 (Ba and WA).

ICBC Frankfurt has set up the Central Complaints Office (ZBS) in the Legal & Compliance Department, which coordinates the complaint handling and the departments involved for each submitted complaint.

All employees are responsible for recording/collection of complaints. The final evaluation and answering will be done by the ZBS. The necessary corrective measures are the responsibility of the concerned Business Departments. The management can request the complaint register at any time and receives annually from the ZBS a status report on the complaint register.

4. Procedure of the complaint handling

4.1 A complaint does not require a specific form. The term "complaint" does not necessarily have to be used. Complainant may personally address his / her concerns

through the Account Manager, by telephone, in writing or by e-mail at Beschwerde@de.icbc.com.cn . The Account Manager must immediately forward the asserted complaint to the Legal & Compliance Department.

Complaints by letter must be addressed to the following postal address:

ICBC Frankfurt Branch
- ZBS Central Complaints Office-
Bockenheimer Anlage 15
60322 Frankfurt am Main

4.2 In order to handle complaints in a timely manner, the complainant must provide the bank with the following information:

- Completed address data (if necessary e-mail address or phone number for feedback)
- Description of the facts and information about what should be achieved with the complaint (error elimination, clarification of different understandings of conditions, etc.)
- Copies of documents or correspondence necessary to understand the process (if available)

4.3 Upon confirmation of the receipt of the complaint or on request, the complainant must be informed in writing or electronically about the complaint handling procedure. If the process can be finalized at short notice, the customer will receive a written response instead of the confirmation of receipt. The communication with the complainant must be in clear and understandable language.

4.4 The submitted complaints should be clarified within 21 days. If no response can be given within this time limit, the complainant will receive information on when the examination is expected to be completed.

4.5 If the final decision does not fully satisfy the complainant's claims, the complainant may contact the Customer Complaints Office at the Federal Association of German Banks (BDB) or the Federal Financial Supervisory Authority (BaFin). In addition, the application of the civil remedy constitutes an additional possibility for the complainant to effectively assert its own legal positions.

4.6 The processing of complaints is free for customers.

5. Internal complaint analysis and corrective and precautionary measures

5.1 The Central Complaints Office examines all relevant information and evidence and information. The analysis includes:

- Background of each complaint and its causes
- Relationships common to certain types of complaints;
- Considering whether the causes could influence other processes or products;
- If necessary, eliminate the causes of the complaint.

5.2 The Central Complaints Office will provide the analysis results and any corrective and precautionary measures if the management so requests.

5.3 As far as corrective measures in operational processes or banking services were required, their effectiveness is subsequently followed up by ZBS.

5.4 The findings gained from complaint handling shall be passed on to the Risk Controlling Department for the purpose of risk management and internal audit, where they are taken into account.

6. **Internal complaints register**

All complaints, their handling, the measures taken, the final decisions and the follow-ups are documented in the complaint report form.

7. **Miscellaneous**

7.1 Unless deviating legal requirements, the relevant documents must be kept in hard copy by the Legal & Compliance Department in the ZBS for at least five years.

7.2 The present guideline is checked for updates at regular intervals, at the latest every 3 years.