

STATEMENT OF “AML” POLICY

China Construction Bank Corporation, New York Branch (the “Branch”) is opposed to money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities. The Branch and its senior management are committed to compliance with all applicable laws and regulations designed to combat money laundering activity, including those rules and regulations requiring the reporting of transactions involving currency, certain monetary instruments and suspicious activity.

Money laundering is generally defined as engaging in acts designed to conceal or disguise the true origins of criminally derived proceeds so that the unlawful proceeds appear to have been derived from legitimate origins or to constitute legitimate assets. Generally, money laundering occurs in three stages. Cash first enters the financial system at the "placement" stage, where the cash generated from criminal activities is converted into monetary instruments, such as money orders or traveler's checks, or deposited into accounts at financial institutions. At the "layering" stage, the funds are transferred or moved into other accounts or other financial institutions to further separate the money from its criminal origin. At the "integration" stage, the funds are reintroduced into the economy and used to purchase legitimate assets or to fund other criminal activities or legitimate businesses. Terrorist financing may not involve the proceeds of criminal conduct, but rather an attempt to conceal the origin or intended use of the funds, which will later be used to support terrorist activity.

The Branch believes that it is the responsibility of every officer and employee to protect the Branch from exploitation by money launderers. The Branch’s management recognizes and has conveyed to officers and employees the consequences of non-compliance with applicable laws and the Branch’s policy, including the significant criminal, civil and disciplinary penalties and reputational harm that could ensue from any association with money laundering activity. The Branch’s commitment to a robust BSA/AML compliance and training program is supported by Head Office as a part of the Bank’s global commitment to an effective anti-money laundering program. Head Office provides resources as necessary to support the Branch’s BSA/AML training and compliance efforts. The Branch provides ongoing and effective BSA/AML training to all personnel to ensure that every officer and employee of the Branch has a thorough understanding of relevant regulatory and Branch-specific requirements.

The Branch has adopted a comprehensive program to combat money laundering and to facilitate compliance with the International Money Laundering Abatement and Anti-Terrorist Financing Act of 2001 (Title III) of the Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act of 2001 (the “USA PATRIOT Act”), the Bank Secrecy Act (the “BSA”) and applicable anti-money laundering (“AML”) and anti-terrorist financing regulations. The Branch is committed to taking all necessary steps to ensure that the Branch is not and cannot be used by persons seeking to invest or transfer funds illegally in support of terrorism or otherwise.