

ANRONG (HONG KONG) CREDIT RATINGS COMPANY LIMITED

Rating Business Record-keeping Policy

1. ARHK safely keeps credit rating results, documents, meeting minutes and data of the rated entities in ARHK's office.

2. The rating documents and data of the evaluated object include:

- (1) Rating proposals and engagement letters
- (2) Data provided by the rated entity for credit rating analysis.
- (3) In the course of rating analysis, working papers and relevant information gathered including meeting records, memorandums, correspondences, emails, faxes and any other investigating records.

(4) Preliminary credit rating results by Credit Rating Committee.

(5) Credit rating reports, meeting minutes and voting records.

(6) Publication of credit rating announcements

(7) Surveillance credit rating information and reports

(8) Compliance documents

3. Safekeeping of credit rating business records:

(1) The filing officer safely keeps the individual files with an index created for each credit rating project in the specified safekeeping place with lock.

(2) Filing reference numbers will be chronologically assigned according to the time of production of the official rating report.

(3) Filing reference number should appear on the back of the filing folder or box, marked with year, number and quantity.

4. Filing requirements:

(1) Document's paper size should be standardized to A4 and allowed for printing on both sides.

(2) Document delivered for filing should be accompanied with a checklist and be signed for acknowledgement by the recipient.

(3) Upon receiving documents from the key credit rating analyst, the filing officer should check and verify the document checklist and put the files in the right place.

5. File Borrowing and Inspection Procedures:

(1) Credit rating analysts should follow the specific approval and registration procedures for borrowing of files. A time limit will be set for all borrowings. An application for extension of borrowing period has to be made if the files could not be returned on time due to special circumstances.

(2) Credit rating analyst of the original project team may borrow the project related files for working purposes in accordance with the borrowing procedures.

(3) Subject to the approval by any of the Responsible Officer, a person who is not involved with the project may borrow project related files for working purposes in accordance with the borrowing procedures.

(4) Borrowed files must not be lent to other staff of ARHK or ARHK's parent company or its affiliates unless approval of a Responsible Officer of ARHK is obtained. The borrower is not allowed to make copies of the borrowed documents which must be returned to ARHK in complete set for safekeeping.

(5) If an analyst of ARHK's parent company or the latter's subsidiary wants to borrow a document from ARHK, approval from the analyst's management and ARHK's must be obtained. The analyst must return the document within the pre-set return period.

(6) With the exception of confidential files, extracts and photocopies can be made of files approved for regulatory inspection.

(7) The filing officer should recall all borrowed files on time. In the event that there is destruction, damage, amendment, addition or deletion noted of the files on return, the filing officer should immediately report to at least one of Responsible Officers.

(8) The filing officer should strictly comply with ARHK's confidentiality policy when handling business records.

6. File Retention Period, Appraisal and Destruction:

(1) Credit rating service records are safely kept for at least seven years after the expiry of the credit rating agreement with the rated entity.

(2) Documents on file in excess of the safekeeping period are regularly appraised. Appraisal is conducted by an appraisal group led by a Responsible Officer.

(3) Following the appraisal, the retention period can be extended for those documents that are still worth for safekeeping. A list of documents is prepared for extended keeping and a list of documents for destruction will be submitted to the Responsible Officer for approval. To avoid any loss or leakage of confidential information, the destruction process should be monitored by two officers (one must be a Responsible Officer) and they will sign on the file destruction checklist.

(4) The file destruction checklist, appraisal report and the written approval for file destruction will be permanently filed with the filing officer

7. File Record and Transfer:

(1) The filing officer keeps record of the receipts, withdrawals, transfers, safekeeping and usages of files and regularly submit to the managing director

(2) If the filing officer resigns or is transferred to another post, he/she should complete any file transfers and go through the hand-over procedures before leaving the position.

8. File Security and Protection:

(1) Any file storage area has to be solid, secured, fireproof, waterproof and clean.

(2) The filing place is dedicated for the safekeeping of business records only.

(3) All accompanying audio-visual files should be stored individually to prevent magnetization and be duplicated according to the safekeeping time limit.

(4) The filing officer should check and stock-take files and takes prompt remedial actions such as repair or making duplicate copies. Should any files be found missing, the filing officer should actively search for them and report to the relevant manager promptly.

(5) The right to modify and interpret this filing system rests with the Responsible Officer.

