# 风险管理与内部控制 RISK MANAGEMENT AND INTERNAL CONTROL

#### 全面风险管理

#### Comprehensive Risk Management

2023年,进出口银行全面贯彻落实党的二十大精神,深入开展习近平新时代中国特色社会主义思想主题教育,全面落实年初全行工作会确定的风险防控目标,持续推进中央巡视整改和行党委专项巡视整改任务,立足全面风险管理,聚焦重点风险攻坚项目和境外业务风险防控,助推全行高质量发展。

**夯实全面风险管理基础。**进一步完善风险偏好指标体系,针对突破阈值的情况,及时采取有效措施控制风险,切实发挥风险偏好对风险管理的宏观导向和引领作用。对标监管要求优化全面风险管理评价实施方案,进一步强化全面风险管理评价结果应用方式。推动建立风险条线资格准入机制,明确风险条线专业资质要求,开展风险条线专业培训,提升全行风险条线垂直管理有效性。

持续提升信用、市场、操作风险管理效能。优化授信业务制度体系,从银行集团层面加强授信业务集中管控,制定差异化授信审批规则和信贷业务审批授权规定,提高信用风险管理水平。加强资金业务风险监测,开展利率汇率走势分析和多层次压力测试,优化估值模型,提升市场风险管理适应性。依托操作风险与控制自我评估、关键操作风险指标监测、操作风险事件及损失数据收集、操作风险压力测试等管理工具,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。

不断提高洗钱、流动性、国别等各类风险管理水平。健全反洗钱组织架构和工作机制,深入开展全行反洗钱专项治理工作,强化反洗钱监督检查力度,切实履行反洗钱义务。坚持资产负债匹配管理原则,持续跟踪市场流动性状况,动态监控全行现金流缺口和资产负债匹配情况,统筹平衡资金来源与运用,运用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。结合国际政治经济形势,实施国别风险分级管理,提高国别风险监测时效性,充分借鉴国际规则,开展重点国别组合压力测试,加大债务风险研究力度。

**稳步推进风险分类管理**。针对新规制定并实施符合本行业务实际的落地工作方案,按照信贷资产、债券资产、同业资产、应收款项细化风险分类管理,健全风险分类治理架构,制定或修订风险分类制度,完善"初分、认定、审批"三级风险分类流程,明确风险分类的原则及标准,按季对金融资产进行风险分类重检,制定过渡方案、改造信息系统,有序开展存量业务在新规下的重新分类。

资产质量保持稳中向好。本行始终将主动防范化解金融风险作为全行工作的重中之重,积极应对国内外形势变化带来的风险挑战,坚定不移控增量、化存量、防变量、提质量,风险防范化解工作取得显著成效。2023年末,全行不良贷款率处于本行历史较低水平。立足"早识别、早发现、早暴露、早处置",持续推动风险防控关口前移,全面摸清风险底数,分析梳理信贷投放中存在的共性问题和本行业务面临的潜在风险。分析重点风险项目处置中的难点、堵点,对已进行风险处置的项目做好"回头看"工作。优化风险巡回督导工作机制,坚持"统一领导、督战结合、总分协同",继续以风险化解督导工作组和工作专班的模式和架构,加大对风险较大区域和项目的督导力度。

In 2023, the Bank fully implemented the guiding principles set forth by the 20th CPC National Congress, carried out in-depth education on the theme of Xi Jinping Thought on Socialism with Chinese Characteristics for a New Era, fully achieved the risk prevention and control targets set by the bank-wide work meeting at the beginning of the year, and continued to complete rectification tasks proposed by the CPC Central Committee's inspection and the Bank's Party Committee's special inspection.

Based on comprehensive risk management, it focused on key risk projects and risk prevention and control of overseas business to boost the high-quality development of the Bank.

The Bank consolidated the foundation for comprehensive risk management. Risk appetite indicators were refined, and timely and effective measures were taken to control risks in cases where thresholds are exceeded to ensure the guiding and leading role of risk appetite in risk management. The Bank optimized its implementation plan for comprehensive risk management evaluation in accordance with regulatory requirements, further strengthening the application of evaluation results. The Bank worked to establish a mechanism for qualification review, made clear the professional qualifications required and provided specialized training, so as to enhance the effectiveness of vertical management on the risk line.

The Bank continued to improve the quality and efficiency of credit, market and operational risks management. It optimized the system of credit lines granted to customers, and strengthened management of credit lines in the head office in a collective way. The Bank formulated differentiated credit line approval rules and authorization regulations for credit businesses to improve credit risk management. The Bank pushed forward with risk monitoring of capital market operations, analyzed trends in interest rates and exchange rates, conducted multi-level stress tests, and optimized valuation models to enhance adaptability in market risk management. With the help of risk management tools such as operational risk and control self-assessment, monitoring of key operational risk indicators, data collection of operational risk events and losses, and operational risk 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.

The Bank reinforced risk management for various risk categories such as money laundering risk, liquidity risk and country-specific risk. It improved its anti-money laundering (AML) structure and working mechanism, carried out special actions on AML, and fulfilled AML obligations with stronger supervision and inspection. Adhering to the principle of match management of assets and liabilities, the Bank followed market liquidity conditions, monitored liquidity gap and asset-liability match, made an overall balance between the sources and use of funds, and constantly monitored liquidity risk by using various instruments, so as to ensure reasonable and appropriate reserve for safe and sound liquidity. In the light of the international political and economic situation, the Bank implemented multi-tiered country-specific risk management, improved the timeliness of country-specific risk monitoring, carried out stress tests on key country portfolios with full reference to international rules, and stepped up research on debt risks.

The Bank steadily promoted risk classification management. The Bank formulated and implemented a work plan according to new regulations and its own business, refined its risk classification management in accordance with credit assets, bond assets, interbank assets and receivables, and improved its risk classification and governance structure. It also formulated or revised the risk classification regulation, improved the three-tiered risk classification process of tagging, identification and approval, made clear the principles and standards of risk classification, conducted quarterly risk classification re-check of financial assets, formulated a transition plan, revamped the information system, and carried out reclassification of the existing business in an orderly manner according to new regulations.

The Bank maintained a steady improvement in asset quality. The Bank has always regarded forestalling and mitigating financial risks as the foremost priority of its work. In the face of increasing risks and challenges brought by the changing situations at home and abroad, the Bank made unremitting efforts to control incremental risks, mitigate existing risks, prevent potential risks and improve asset quality, thus achieving significant results in risk prevention and mitigation. At year-end, the Bank's NPL ratio stood at a historically low level. The Bank adopted a forward-looking approach to risk prevention and control with the principle of "early identification, early discovery, early exposure and early disposal". Having had a clear picture of the overall risk base, it analyzed and sorted out common problems in credit disbursement and potential risks facing its business. The Bank analyzed the difficulties and bottlenecks in the disposal of key risk projects, and did reviews on projects that have already been disposed of. Adhering to the principle of "unified leadership, integration of supervision and risk defusing, and coordination between headquarters and branches", it optimized the risk supervision mechanism, and continued to intensify its supervision on regions and projects with higher risks through the work of the risk defusing supervision group and its special team.

## 内部控制与合规经营

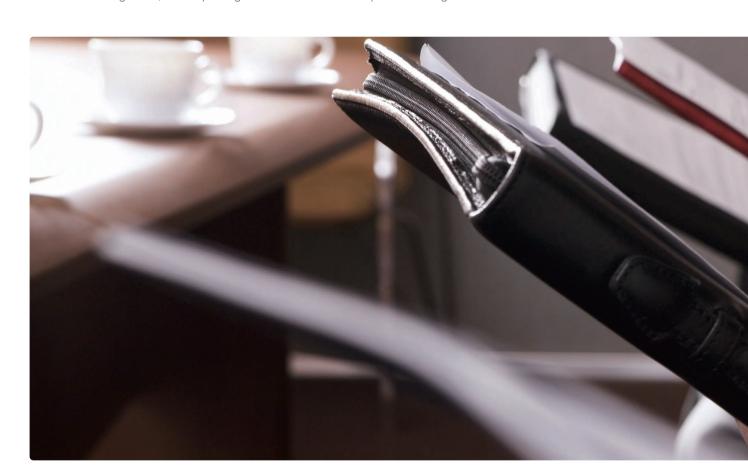
### Internal Control and Compliance

2023年,本行持续优化内部控制体系,加强制度建设,加大现场检查力度,注重内控评价结果运用,切实履行 关联交易管理职责,不断提高内控合规管理水平。

多措并举强化内部控制管理。持续优化内部控制体系,完善内部控制措施,提升内部控制评价质效,全面推进以评促管促治。健全案防长效机制,压实案防主体责任,精细化开展案防排查,加强内控案防指导、检查、监督力度,推进全行内控案防治理能力持续提升。因时因势新建、修订制度,推动各项制度"管用好用简洁",与新形势下的经营管理需要相适应相匹配。开展贷款业务"制度树"搭建工作,打通内外规与系统流程"断点",推动提升制度合规性、有效性,强化硬约束。统筹全行主要业务条线现场检查,实现对境内分行全覆盖,开展屡查屡犯问题梳理和案例通报,进一步发挥合规风险二道防线作用。

**多策并用提高关联交易管理能力**。本行不断完善关联交易管理体制机制,动态更新关联方名单,持续抓好关联交易管理,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。除免予按照关联交易方式披露的交易外,2023年本行共发生需披露的一般关联交易82.69亿元(以人民币计,外币已折算为人民币),为存款和其他类型关联交易,未发生重大关联交易。

In 2023, the Bank continued to optimize its internal control system, strengthened institutional building, reinforced on-site inspections, valued the application of internal control evaluation results, and fulfilled the responsibilities of connected transaction management, thus improving internal control and compliance management.



The Bank took multiple measures to strengthen internal control management. It continued to optimize its internal control system, improved internal control measures, enhanced the quality and effectiveness of internal control evaluation, and comprehensively promoted management and governance through evaluation. The Bank improved the long-term mechanism of forestalling and controlling the risk of financial crime, conducted meticulous investigations, and strengthened guidance, inspection, and supervision of internal control to improve overall capability of forestalling and controlling financial crime risks. It established and revised its regulations in response to the changing circumstances to ensure that all regulations are effective, user-friendly, concise, and aligned with the requirements of modern business operation and management. The Bank set up a "regulation tree" for its loan business to remove bottlenecks in coordinating external and internal regulations with system process, thus promoting regulatory compliance and effectiveness while strengthening hard constraints. It gave full play to the role of the second line of defense against compliance risks by coordinating on-site inspections in major business lines covering all domestic branches and reporting on repeated issues.

The Bank used multiple strategies to improve connected transaction management. The Bank improved the management mechanism for connected transactions by dynamically updating the list of related parties, consistently strengthening the management of connected transactions, strictly fulfilling information disclosure obligations, enhancing supervision and assessment as well as data governance, and accelerating system optimization. In so doing, risks associated with connected transactions were effectively prevented. The Bank followed commercial principles in connected transactions that are fairly priced. Except for transactions exempted from disclosure, the Bank had a total of RMB8.269 billion of connected transactions that met disclosure requirements in 2023, which were deposit-related connected transactions and those of other types. No significant connected transactions occurred.

