

ZTT Compliance Rules on Compliance Audit

CHAPTER I. General Provisions

Article 1. ; 89 '4: :5 :. 8 2 '4: 2 9 8 2 9 '4 8 -; 2:/549 5, . /4' '4 5: 8)5; 4:8/ 9/4 . /). :. /'4-9, . 54-:/ '4). 4525-? 5 : :. **Company** 58 **ZTT** 56 8: 9)522):/ 2 **Applicable Laws** '4 :. 53 62'4) ; / 2/4 9 :. 3 625? 9 53 62'4) 5 5, 54 ;): '4 5: 8)53 62'4) 652)/ 9 '4 8 7; /8 3 4:9 5, :. 53 6'4? **ZTT Compliance Policies** : '1/4- /4:5 '))5; 4: :. (; 9/4 99 4 /8543 4:9/4 . /). :. 53 6'4? 56 8: 9 :. 9 ; 2 9'8 ,583 ; 2: :5 (: 8 6853 5: :. ,; 22 9:)53 62'4) ' 3 /4/98:/ 3 '9,8 9 :5 ,')/2:' :. 53 6'4? 9 2 -:/3 ' : '4)53 62'4: (; 9/4 99 56 8:/54 / . /4: -8?: '4 :5 68 4: '4 8 ;) 53 62'4) /91 9

Article 2. . 9 ; 2 9'662' :5 :. (; 9/4 99'):/ /:/ 9)'88/ 5; : (? 53 6'4? '4 /:9 ,58 /-4 '4 53 9/))54:8522 9,(9/ /'8/ 9 . 8 /4', : 8 8 , 88 :5 '9 :. **"Subsidiaries** . 53 62'4) : '4 '8 6'83 4: 5, :. 53 6'4? /229, 6 8 /9 5 8: . /3 623 4:':/54 5, :. 9 ; 2 9(? /:9 ; (9/ /'8/ 9

Article 3. 83 9/4 :. 9 ; 2 9'8 ,/4 '9,5225 9

(1) **Compliance** 3 '49 :. (; 9/4 99 56 8:/549 5, :. 53 6'4? '4 /:9 ; (9/ /'8/ 9)54,583 :5 :. 8 7; /8 3 4:9 5, '662)'(2 2 9 /4: 84':/54' 2)54 4:/549 53 62'4) 5 9 5, 4: 84':/54' 2 8-'4/ ':/54 8 -; 2:58? 685 /9/549 /4 ; 98' 2 9'4 '8 (; 9/4 9968'):/) :. /)9'4 :. 53 6'4? 9'8/)2 9 5, '995)/':/54 '4 8 2 9 '4 8 -; 2:/549

(2) **Compliance Risks** 8 , 89 :5 :. 6599(/2:?' :.' : 2 -'2 9 4):/54 ' 3 /4/98:/ 6 4'2? 9/-4,/) '4: 25995, 6856 8? 588 6; :':/54 5)); 89:5 :. 53 6'4? '4 /:9 ; (9/ /'8/ 958 3 625? 9 ; :5 54)53 62'4) 54 ;):9

(3) **Appropriate Compliance Department** 6 4 /4- 54 :. 4:/: 9 8 96549/(2 ,58: . (; 9/4 99 56 8:/549 8 , 89:5 53 62'4) : '4 '8 6'83 4: 5, :. 53 6'4? 58 53 62'4) 6'83 4: 58 53 62'4) ,,) 895, :. ; (9/ /'8/ 9

(4) **Business Department** 8 , 89 :5 6'83 4: 58 58-'4/ ':/54 ; 4 8 :. 53 6'4? 58: . ; (9/ /'8/ 98 96549/(2 ,58(; 9/4 99 56 8:/54 '4 9/-4/4-)54:8') :9 /4)2 /4- (; :45: 23 /: :5 ; 9/4 99 / /9/549 '4 ; 8). '9 ; 662' / /9/549 5, :. 53 6'4? '4 '81 : 6'83 4: 5, ; (9/ /'8/ 9

(5) **Internal Audit** 8 , 89:5 :.)53 62'4) ' ; /:)54 ;): (? :. 668568' : 53 62'4) 6'83 4: 5, :. 53 6'4? '4 /:9 ; (9/ /'8/ 9 :5 '8 :. '8/5; 9 6'83 4:9 / /9/549 / . /4 :. ; 4: 54 :. /3 623 4:':/54 '4 ,,) /: 4 99 5, :. 53 62'4) ; 2 9 5, 58 /49'4) :.)53 62'4) ' ; /: 5, ; 8). '9 ; 662' / /9/54 5, :. 53 6'4?)54 ;): (? :.)53 62'4) ' ; /: : '3 ,583 (? :. 53 6'4? 9 53 62'4) : '4 '8 6'83 4: /954 1/4 5, 9). 4: 84' 2 ; /:

(6) **Cross-audit** 8 , 89:5 :.)53 62'4) ' ; /:)54 ;): (? :. '668568' :

)53 62' 4) 6' 83 4: 5, :. 53 6' 4? ' 4 :. ; (9/ ' 8/ 9:5 ' 8 5:. 8 9 (9/ ' 8? 54 :. /3 62 3 4:':/54 ' 4 ,,) :/ 4 99 5, :. 53 62' 4) 8 2 9 5, .
)53 62' 4) ' ; /: 5, 4: 84':/54' 2 /3 /:)54 ;): (? :.)53 62' 4) ' ; /: ' 3 ,583 (? :. 53 6' 4? 9 53 62' 4) : ' 4 ' 8 6' 83 4: /9' 4 ' 3 62 5, 9).
 8599' ; /:

Article 4. . 53 6' 4? ' 4 :. ; (9/ ' 8/ 9 9 ' 22 3 ' 1 ' 44; ' 2)53 62' 4)
 ' ; /: 62 4 '). ? ' 8 ' 4 9 ' 22 58- ' 4/)53 62' 4) ' ; /: -85; 69:5)54 ;): 4: 84' 2
 ; /: ' 9 22' 9 8599' ; /: 49; 8/4- :. ' : ' 2 ' 9 54 85; 4)53 62' 4) ' ; /: 54 :.
 53 6' 4? ' 4 '). ; (9/ ' 8? /22(')88/ 5;: 8? :. 8 ? ' 89 4 ' /:54:5 :.
 '(5 8 -; 28' ; /:9 :. 668568' : 53 62' 4) 6' 83 4: 5, :. 53 6' 4? 58' 4?
 ; (9/ ' 8? 3 ' ? ; 654 :.)8 /: '(2 8 658 ,853 3 625? 9 58 5:. 89 8 658 9
 9 (9' 4: /: /4- 3 ' : 8' 2)53 62' 4) 8/9 5,) 8' /4 ; (9/ ' 8/ 9 58) 8' /4 ; 9/4 99
 6' 83 4: 5, ' 96)/, /) ; (9/ ' 8/ 9)54 ;): :8)53 62' 4) ' ; /: ' 94

CHAPTER II. Compliance Audit Procedure

Article 5. . 668568' : 53 62' 4) 6' 83 4: 5, '). ; (9/ ' 8/ 9 9 ' 22
 3 ' 1 /:9' 44; ' 2)53 62' 4) ' ; /: 62 4 (' 9 54 ');: ' 29/; ' : /54 5, /:9 (; 9/4 99 ' 4
 9 (3 /: :. 62 4 :5 :. 53 62' 4) : ' 4 ' 8 6' 83 4: 5, :. 53 6' 4? . ' 44; ' 2
)53 62' 4) ' ; /: 62 4 5, :. 53 6' 4? 9 ' 22(68 6' 8 (? :. 53 62' 4) ,,) 89
 5, :. 53 6' 4? ' 4 9 (3 /: :5 :. 53 62' 4) : ' 4 ' 8 6' 83 4: 5, :. 53 6' 4?
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 9 (3 /: : 62 49 ' 4 . 529./) 2563 4: 5, :. (; 9/4 99 5, :. 53 6' 4? ' 4 :.
 ; (9/ ' 8/ 9 : 83 /4 :. ' 44; ' 2 4: 84' 2 ; /: ' 4 8599' ; /: 62 495, :. 53 6' 4?
 ' 4 :. ; (9/ ' 8/ 9 ' 4 9 (3 /: :. 9 3 :5 53 62' 4) 53 3 /: 5, :. 53 6' 4?
 ,588)58 44 53 62' 4) ; /: 85) ; 8 . ' 8

Article 6. . 668568' : 53 62' 4) 6' 83 4: 5, :. 53 6' 4? ' 4 :.
 ; (9/ ' 8/ 9 9 ' 22 9 2): 53 62' 4) ,,) 89' : ' 22 2 29 58 6 89544 2,853 8 2:
 ; 9/4 99 6' 83 4:9:5 ,583 ')53 62' 4) ' ; /: -85; 6 /: -85; 6 2' 8' 4 ' :
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 :. 53 6' 4? :. ; (9/ ' 8/ 9 ' 4 ' 22 ; 9/4 99 6' 83 4:9 . 53 62' 4) ; /:
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. 668568' : 53 62' 4) 6' 83 4: 5, '). ; (9/ ' 8/ 9 /9 8 96549/(2 :5
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 53 62' 4) /9| 9 5, :. ; /: 53 6' 4? 58 ; 9/4 99 6' 83 4: /22(8,/ ' 4 ' 99 99 (? 8 :8/ /4- ' 4 8 / /4- (; 9/4 99 ,/2 9' 4 8 2 ' 4: 5); 3 4':/549
 ' 4 /4,583 ':/54 ' 4 8 7; 9/4- ' 8/5; 93 ': 8' 29,853 :. ' ; /: 4:/ / 958 ; 9/4 99
 6' 83 4:9

; 8/4- :. ' ; /: 5 8 :. :8 /4/4- ' 4 6 8,583 ' 4) 5, 53 62' 4) ,,/) 89 :.
 ' ; /: 53 62' 4) ,,/) 89 9 ' 22 45: (68 9 4: ; 8/4- :. ' ; /: ' 9 6 8 8 2:
 685 /9/549 9 44 53 62' 4) ; /: ' 2':/54 583

Article 8. ,: 8:..)53 62:/54 5,)53 62' 4) ' ; /: :. -85; 6 9 ' 22 68 6' 8
 /4 2-: 5, :. ' ; /: -5' 29 ' 8:: 4 53 62' 4) ; /: 658 ' 4 ' 8:: 4 53 62' 4)
 ; /:):/,/)':/54 5:/) . /). 9 ' 22/4)2 685(2 3 9' 4 ,2 9 /9)5 8 ; 8/4-
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 3 ' 9, 8 9 . 8:: 4 53 62' 4) ; /: 658 9 ' 22/4)2 ' 53 62' 4) ; /:
 52:/54 6/4/54 583 9 44 /4 . /).

(1) . 53 62' 4) ; /: 52:/54 6/4/54 583 ,58:: 4: 84' 2 ; /: 5,
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 . / , 53 62' 4) ,,/) 8 5, :. 53 62' 4) : ' 4 ' 8 6' 83 4: 5, :. 53 6' 4? ,58
 . /9. 89/-4' :; 8

(2) . 53 62' 4) ; /: 52:/54 6/4/54 583 ,58:: 4: 84' 2 ; /: 5, ' 4
 ; (9/ ' 8/ 99 ' 22(9 (3 /: (? :. 53 62' 4) ,,/) 8 5, 9). ; (9/ ' 8/ 9:5 :.
 . ' 5, :. 53 62' 4) ' 4' - 3 4: ' /4- 85; 6 5, :. 53 6' 4? ,58 . /9. 8
 9/-4' :; 8

(3) . 53 62' 4) ; /: 52:/54 6/4/54 583 ,58 8599' ; /: 9 9 ' 22(
 9 (3 /: (? :. 53 62' 4) ,,/) 8 5, :. 53 6' 4? :5 :. . / , 53 62' 4) ,,/) 8
 5, :. 53 62' 4) : ' 4 ' 8 6' 83 4: 5, :. 53 6' 4? ,58. /9. 89/-4' :; 8

58 /99, 9 965:: /4 :.)53 62' 4) ' ; /: ' 4 /4: 84' 2 /4 9/-':/54 9 ' 22 ()
)54 ;): /4 '))58 ' 4) /: :. 8 2 ' 4: 685 /9/549 5, :. 53 62' 4) ; 2 9 54
 4: 84' 2 4 9/-':/54 22:: /22 -' 2' 4 ; 4 /9)/624 /99, 9 965:: /4 :. ' ; /: 9 ' 22
 (9 (3 /: :5 :. 9 6 8 /9/54 6' 83 4: 5, :. 53 6' 4? ' 4 :. 8 2 ' 4:
 ; (9/ ' 8/ 9,58/4 9/-':/54 ' 4 6; 4/9. 3 4: 22::)53 62' 4) ' 3 /4/9.8:/54 /99, 9
 965:: /4 :. ' ; /: 9 ' 22(9 (3 /: :5 :. 53 62' 4) : ' 4 ' 8 6' 83 4: ' 4
 53 62' 4) 53 3 /: 5, :. 53 6' 4?

Article 9. . ; /: 53 6' 4? 58 ; 9/4 99 6' 83 4: 9 ' 22 8):/, ? /:9
 56 8:/54 : 83 (? : 83 '))58 /4- :5 :. 53 62' 4) ; /: 658 ' 4 53 62' 4)
 ; /:):/,/)':/54 5:/) /99, (?)53 62' 4) ' ; /: -85; 6 ' 4 9 ' 22 9, (3 /: :.
)588 9654 /4- 8):/,/)':/54 8 658 :5 :. 668568' : 53 62' 4) 6' 83 4: 5, :.
 8 2 ' 4:)53 6' 4? /: /4 ' ? 9', : 8:..):/54 5, :. 53 62' 4) ; /: 658

Article 10. 5 49, 8 :. '):: ' 2/3 62 3 4':/54 5, 8):/,/)':/54 3 ' 9, 8 9 :.

668568': 53 62' 4) 6' 83 4: 5, :: 53 6' 4? ' 4 :: 8 2 ' 4: ; (9/ ' 8/ 9
9 5; 2 9 9' /4') 54:/4; /4- , 525 ; 6 ' 4 9 6 8 /9/54 5 8:: 8):/,/)' :/54 5, ' ; /:
4:/ / 9' 4 6' 83 4: 9

Article 11. . 668568': 53 62' 4) 6' 83 4: 5, :: 53 6' 4? ' 4 ::
8 2 ' 4: ; (9/ ' 8/ 9 9 ' 22 : ' 1/4- /4: 5 ') 5; 4: , (') 19' 4 ' /) 98) / ; 8/4-
) 53 62' 4) ' ; /: ' 9 22 ' 9 :: 9/; ' :/54 5, (; 9/4 99 9 3 3 ' 8/ /: 9 68'): /)' 2
6 8/ 4) 9 ' 4 6 8/5 /)' 22 ' 4' 2 :: 9 /: ' (2 4 99 ' 4 ,,) / 4 99 5, ::
) 53 62' 4) 8 2 9 ' 4 ,; 8. 8 8 /9 58 9, 662 3 4:) 53 62' 4) 652) / 9 /, 4) 99 8?
9 44 583 5,):/,/)' :/54 85-8 99 5, 53 62' 4) 99, 9

CHAPTER III. Record and File Management of Compliance Audit

Article 12. . 668568': 53 62' 4) 6' 83 4: 5, :: 53 6' 4? ' 4 ::
; (9/ ' 8/ 9 3 ; 9 6856 82' 1 6 ' 228) 58 9 ' ; /: 8 6589 ' 4 5); 3 4: 9 ; 8/4- ::
) 53 62' 4) ' ; /: ' 4 ; 2 8 : ' /4 :: 9 3 6; 89, ' 4: : 5 5); 3 4: 8 : 4:/54 652)? 5,
:: 53 6' 4? ' 4 :: ; (9/ ' 8/ 9

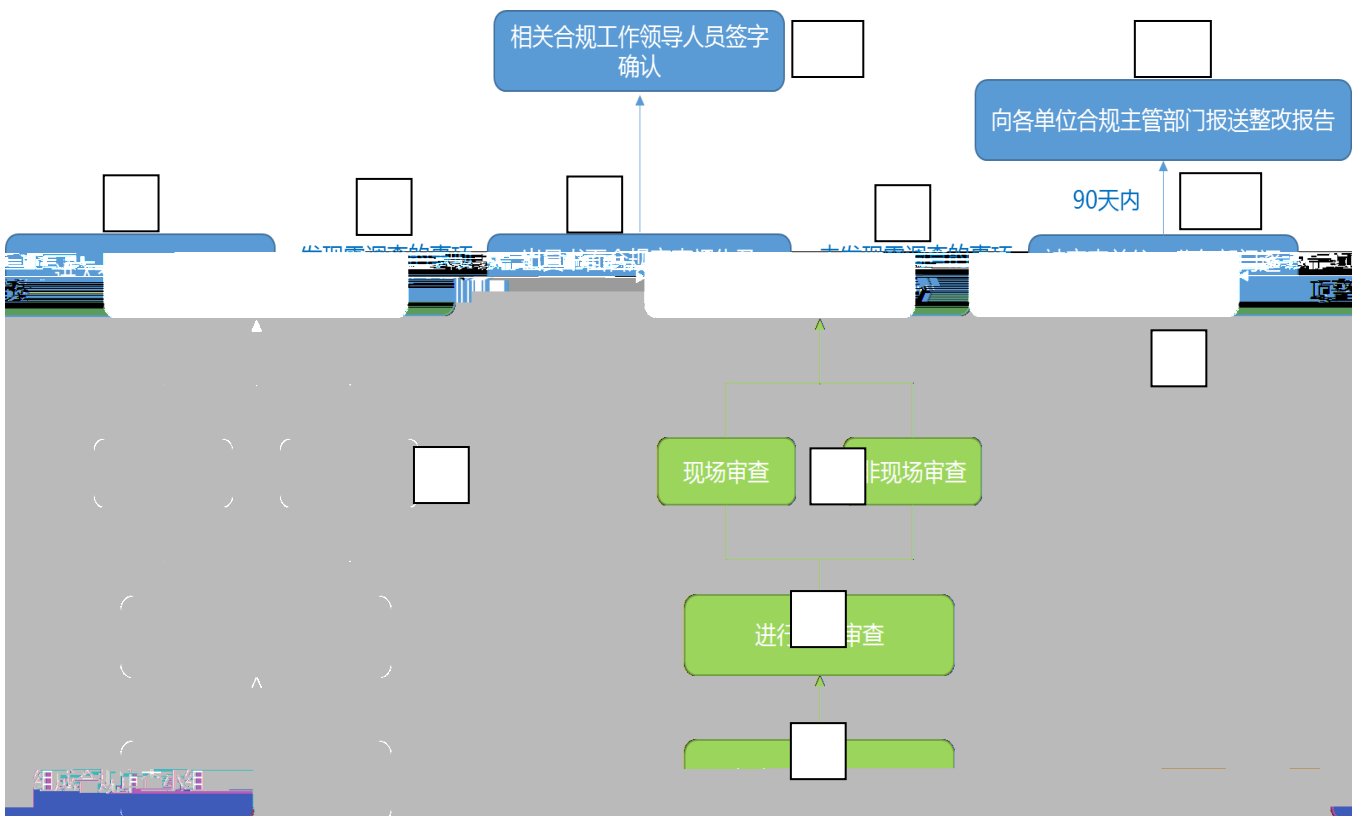
CHAPTER IV. Punishment and Questions

Article 13. 4? 7; 9/5498 - ' 8 /4- :: 9 ; 2 93 ' ? (8 /9 : 5 :: 668568':
53 62' 4) 6' 83 4: 5, :: 53 6' 4? ' 4 :: ; (9/ ' 8/ 9

44 9

1. 53 62" 4) ; /: 85) ; 8 . ' 8
2. 53 62" 4) 4: 8 / 4,583 ' :/54 583
3. 53 62" 4) 4: 8 / 54: 4: 583
4. 53 62" 4) ; /: ' 2 ' :/54 583
5. 53 62" 4) ; /: 52 :/54 6/4/54 583
6. 583 5,):/,/) ' :/54 85-8 99 5, 53 62" 4) 99, 9

44 53 62' 4) ; /: 85) ; 8 . ' 8



,583 /4-)53 62' 4) ' ; /: -85; 6

)' 88? /4- 5; :)53 62' 4) ' ; /:

54 9/: ' ; /:

5,, 9/: ' ; /:

/99, /4- 8/: 4 53 62' 4) ; /: 658 ' 4 53 62' 4) ; /:):/,/)' :/54 5:/)

3 ' :: 898 7; /8/4- /4 9/-' :/54 ,5; 4

4: 8/4- /4:5)53 62' 4) /4 9/-' :/54 685) ; 8

45 3 ' :: 898 7; /8/4- /4 9/-' :/54 ,5; 4

' ; /: 53 6' 4? 58 ; 9/4 99 6' 83 4: :5 3 ' 1 8):/,/)' :/54 54 /99, (? ' 45:. 8

/:./ 4 ' ?9

9, (3 /:/4- 8):/,/)' :/54 8 658 :5:. 668568' : 53 62' 4) 6' 83 4:

9/-4 (? 8 2 ' 4: 3 ' 4' - 8' 26 89544 2/4). ' 8- 5,)53 62' 4) ,58)54,/83 ' :/54

Compliance Interview Information Form

Interview Information Form	
Interviewing Matters:	
3 (895, :. 53 62' 4) ; /: 85; 6	
; /: 53 6' 4? 58 ; 9/4 99 6' 83 4:	
4: 8 /	/3
4: 8 /	/3
4: 8 /	/3
4: 8 /	/3
4: 8 /	/3
4: 8 /	/3
4: 8 /	/3

Compliance Interview Content Form

Interview Content Form	
Interviewing Matters:	
3 (895, :. 53 62' 4) ; /:	4: 8 /
/3	; /: 53 6' 4? 58 ; 9/4 99 6' 83 4:
/-4' :: 8 5, :. 4: 8 / 8 /-4' :: 8 5, :. 4: 8 /	

44 53 62' 4) ; /: ' 2 ':/54 583
; /: 53 6' 4? 58 ; 9/4 99 6' & 3 4:
': 5, 53 62' 4) ; /:
' 5, 53 62' 4) ; /: 85; 6
3 (895, 53 62' 4) ; /: 85; 6

Subjects	Issues	Results	Any exceptions? If so, please briefly describe	Recommended rectifications	Notes
Whether a Compliance Management Organization and personnel is in place and performing duties	1.1 Is there a Compliance Management Organization?				
	1.2 Are the duties of personnel in the Appropriate Compliance Department clear and definite?				
	1.3 Are there full-time Compliance Officers? How many?				
	1.4 Are there any part-time compliance staff members? How many?				
	1.5 Description of publicity and implementation of compliance requirements by full-time Compliance Officers and part-time compliance staff members and records related thereto				
	1.6 Description of compliance training for full-time Compliance Officers and part-time compliance staff members and records related thereto				
	1.7 Compliance coverage by full-time Compliance Officers and part-time compliance staff members and local staff's understanding of compliance work				
	1.8 Have employees signed employee compliance statements and been imposed of high-risk job background surveys?				
Implementation of Compliance Policies	2.1 When will the compliance work start?				
	2.2 Are the implementation steps of the compliance work procedure completed?				
	2.3 Is the compliance approval process completed?				
	2.4 Are the financial approval procedures of the compliance work process completed?				
	2.5 Are the records and files for compliance work process completed?				
	2.6 Is the standing book entry for compliance work process completed?				
	2.7 Is the statistical report of compliance work process				

	(monthly report, annual report, etc.) completed?				
	2.8 Is the compliance supervision for the compliance work process completed?				
	2.9 Are the answers and records of internal consultation completed?				
Response to Compliance Risk Assessment	3.1 Are compliance risk assessments conducted regularly?				
	3.2 Are effective measures taken against the results of compliance risk assessment?				
	3.3 What measures are taken to deal with different types of risks?				
	3.4 Are internal violations investigated?				
	3.5 Investigation Report and Result Report on Internal Violations				
	3.6 What measures are taken to deal with internal reporting?				
Compliance Training, Publicity and Implementation	4.1 Is the annual compliance training plan in accordance with the requirements of the higher authorities?				
	4.2 Are the training tasks given by the higher authorities and the management of the unit completed on time?				
	4.3 Is the compliance training record complete?				
	4.4 Does compliance training achieve the desired results?				
	4.5 Priority given by major management members to compliance policy implementation and relevant implementation records				
	4.6 Description and effect of compliance publicity and implementation towards partners and third parties				
Assessment of Compliance Work	5.1 Annual Assessment of Compliance Work				

44 53 62' 4) ; /: 52 :/54 6/4/54 583

; /: 53 6' 4? 58 ; 9/4 99 6' 83 4:

' : 5, 53 62' 4) ; /:

' 5, 53 62' 4) ; /: 85; 6

3 (895, 53 62' 4) ; /: 85; 6

Case Number	Violations Details	Accountable Person	Consequences/ Results	Applicable Rules for Determination of Nature of Violations	Evidence and Assessment Records (please specify if there is any attachment)	Solution Opinions	Remedy and Rectification Measures

Signature of Handling Person for Compliance Audit:

Signature of Leader of Compliance Management Leading Group/Chief

Compliance Officer:

Problems Spotted	Causes	Suggestions for Adjustment and Improvement	Reasons for Adjustment	Suggested Improvement Measures	Timeline for Improvement

Signature of Compliance Officer

Name:

Date: