

# **南京银行零售营销宣传政策要点**

## **Key Points of Retail Marketing and Promotion Policy**

### **of Bank of Nanjing**

南京银行股份有限公司（以下简称“本行”）高度重视零售营销宣传管理工作，通过持续优化完善政策制度、管理机制和操作流程等，加强规范本行零售营销宣传及信息披露行为，不断提升本行零售营销宣传的标准化、专业化和规范化水平，有效强化本行零售营销宣传和信息披露管理，切实维护本行和金融消费者合法权益。

Bank of Nanjing Co., Ltd. (“the Bank”) attaches great importance to the management of retail marketing and promotion activities, and has continuously improved policies and rules, management mechanisms, and operational procedures to standardize retail marketing and promotion and disclosure of information, so that such activities are carried out in a more regulated and professional manner, effectively safeguarding the legitimate rights and interests of both the Bank and financial consumers.

#### **一、适用范围**

#### **I. Scope of Application**

本政策适用于本行及境内各级机构。子公司可参照执行。

The policy applies to the Bank and domestic entities at all levels, and subsidiaries may implement measures in compliance

with the principles herein.

## 二、定义

### II. Definitions

本政策中的零售金融业务宣传材料是指本行通过一定媒介和形式，面向零售客户分发、发送和发布的宣传本行零售金融产品及服务的资料和信息。本政策中的产品及服务信息披露,是指将产品及服务的相关信息通过各种适当的合法渠道告知金融消费者的行为,覆盖售前、售中、售后全流程。

The “promotion materials for retail financial services” in this policy refer to materials and information distributed, sent, or published through specific media and forms to retail customers, aimed at promoting the Bank’s retail financial products and services. The “product and service information disclosure” refers to the act of conveying product and service information to financial consumers through various appropriate and legal channels, covering the entire process including pre-sales, during-sales, and post-sales stages.

## 三、管理架构

### III. Management Structure

本行总行零售金融部为本行零售金融业务宣传材料管理的牵头管理部门。总行零售金融板块各部门负责管理本部门、本条线和本领域的零售金融业务宣传材料。各分行负责本分行零售金融业务宣传材料的引用、设计、制作、

发布、审核、备案、归档、培训、检查、监督管理等工作。总行金融消费者权益保护工作委员会为本行产品及服务信息披露工作的领导机构,负责对全行金融产品及服务的信息披露工作进行统筹管理、监督实施与总结汇报。

The Head Office Retail Finance Department serves as the leading management department responsible for the bank-wide promotion materials for retail financial services. Departments within the Head Office retail financial services segment manage promotion materials for their respective department, business line, and specialized area. Branches are responsible for the reference, design, production, release, review, filing, archiving, training on, inspection, supervision and management of their respective promotion materials for retail financial services. The Head Office Financial Consumer Rights and Interests Protection Committee serves as the leading organization for product and service information disclosure, responsible for overall management, supervision of implementation, and summary and reporting regarding information disclosure of financial products and services of the Bank.

#### 四、遵守法律法规

#### **IV. Compliance with Laws and Regulations**

本行严格遵循《中华人民共和国民法典》《中华人民共和国广告法》《中华人民共和国消费者权益保护法》《中华人民共和国个人信息保护法》《中华人民共和国反不正当竞争法》《中华人民共和国著作权法》《银行保险

机构消费者权益保护管理办法》《中国人民银行金融消费者权益保护实施办法》《关于进一步规范金融营销宣传行为的通知》等法律法规及政策要求。

The Bank strictly complies with laws, regulations, and policies, including the *Civil Code of the People's Republic of China*, the *Advertising Law of the People's Republic of China*, the *Law of the People's Republic of China on the Protection of Consumer Rights and Interests*, the *Personal Information Protection Law of the People's Republic of China*, the *Anti-Unfair Competition Law of the People's Republic of China*, the *Copyright Law of the People's Republic of China*, the *Measures for the Administration of the Protection of Consumer Rights and Interests by Banking and Insurance Institutions*, the *Implementing Measures of the People's Bank of China for Protecting Financial Consumers' Rights and Interests*, and the *Notice on Further Regulating Financial Marketing and Promotion Activities*.

## 五、政策概述

### V. Policy Overview

#### （一）基本行为规范

##### (I) Basic code of conduct

1.零售金融业务宣传材料应全面、如实、准确、客观地反映本行零售金融业务、服务内容的主要特性和与其有关的重要事实，应显著、清晰地表示法律、行政法规规定宣

传材料中应当明示的内容。

1. Promotion materials for retail financial services must comprehensively, truthfully, accurately, and objectively reflect the key characteristics of the Bank's retail financial services and material facts related thereto, and must prominently and clearly disclose content required by laws and administrative regulations in promotion materials.

2. 不得有虚假记载、误导性陈述或重大遗漏。

2. Promotion materials for retail financial services must not contain any false statements, misleading statements, or material omissions.

3. 不得以欺诈、隐瞒或者引人误解的方式对金融产品或金融服务进行营销宣传。金融营销宣传不得引用不真实、不准确的数据和资料；不得隐瞒限制条件；不得对过往业绩进行虚假或夸大表述；不得对非保本投资型金融产品的未来效果、收益或相关情况作出保证性承诺，明示或暗示保本、无风险或保收益；不得使用偷换概念、不当类比、隐去假设等不当营销宣传手段。

3. Financial product and service marketing and promotion must not involve fraudulent, concealed, or misleading practices. It is prohibited to cite inaccurate or unreliable data and materials; must not conceal limiting conditions; make false or exaggerated representations regarding past performance; provide guaranteed commitments regarding future outcomes,

returns, or related matters of non-principal-guaranteed investment products; or explicitly or implicitly suggest principal protection, risk-free investment, or guaranteed returns. Additionally, improper marketing practices such as concept substitution, inappropriate comparisons, or omitting underlying assumptions are prohibited.

4. 不得以损害公平竞争的方式开展金融营销宣传活动。金融营销宣传不得以捏造、散布虚假事实等手段恶意诋毁竞争对手，损害同业信誉；不得通过不当评比、不当排序等方式进行金融营销宣传；不得冒用、擅自使用与他人相同或近似等有可能使金融消费者混淆的注册商标、字号、宣传册页。

4. Financial product and service marketing and promotion must not disrupt fair competition. It is prohibited to fabricate or spread false information to maliciously denigrate competitors or damage the reputation of industry peers; utilize improper evaluations or rankings; or fraudulently or unauthorizedly use trademarks, business names, or promotional materials that are identical or similar to those of others, potentially causing confusion among financial consumers.

5. 不得利用政府公信力进行金融营销宣传。不得利用金融管理部门对金融产品或服务的审核或者备案程序，误导金融消费者认为金融管理部门已对该金融产品或服务提供保证；不得对未经国务院金融管理部门或地方金融监管部

门审核或备案的金融产品或金融服务进行预先宣传或促销。

5. Financial product and service marketing and promotion must not exploit government credibility. It is prohibited to mislead financial consumers by implying that financial regulators have guaranteed financial products or services while they are actually under review or filing procedures. Additionally, advance promotion or sale activities are prohibited for financial products or services that have not been reviewed or filed with financial regulators under the State Council or local financial regulators.

6.不得承诺收益或承担损失。不得预测基金投资业绩或宣传基金预期收益率；不得违规标注“利率”“固定收益率”“收益率”等确定收益或模糊概念的理财收益表达方式。

6. Financial product and service marketing and promotion must not guarantee returns or commit to bearing losses. It is prohibited to forecast fund investment performance or advertise expected yield rates of funds; or use banned expressions related to financial product returns that may imply guaranteed returns or confuse concepts, such as “interest rate”, “fixed yield rate” or “yield rate”.

7.不得缺少或遗漏“理财非存款、产品有风险，投资须谨慎”“基金有风险，投资须谨慎”“贵金属投资有风险，

投资须谨慎”等风险提示语句。

7. Risk warnings must not be absent or omitted from promotion materials, such as “Wealth management products are not deposits; products involve risks; investment should be approached with caution”, “Funds involve risks; investment should be approached with caution”, and “Precious metal investment involves risks; investment should be approached with caution”.

8.不得公开营销宣传私募类产品。

8. It is prohibited to publicly market or promote private placement products.

9.不得使用“国家级”“最高级”“最佳”“收益最高”“第一”“首个”“绝对”等用语。

9. It is prohibited to use terms such as “state-level”, “highest-grade”, “best”, “highest returns”, “first”, “first-ever”, “absolute”, etc.

10.不得使用广告法、反不正当竞争法、反垄断法禁止的内容。

10. Financial product and service marketing and promotion must not use content that is prohibited under the Advertising Law, Anti-Unfair Competition Law, or Anti-Monopoly Law.

11.不得损坏客户知情权。不得违规收集与使用用户客户信息、发布营销信息；不得在未取得客户同意或许可得情况下，通过电话、短信、即时通信工具、电子邮件、传

单等方式对客户开展营销宣传。

11. Customer right to know must not be compromised. Unauthorized collection and use of customer information, as well as dissemination of marketing messages, are prohibited. Marketing and promotion must not be conducted via phone calls, SMS messages, instant messaging tools, email, printed brochures, or other methods without obtaining customer consent or authorization.

12.不得损坏客户自主选择权。不得存在强买强卖、违背客户意愿搭售或捆绑销售的行为。不得对产品服务附加其他不合理的条件。

12. Customer right to autonomous choice must not be impaired. Forced sales, unsolicited tying sales, or bundled sales against customers' will are prohibited. No unreasonable conditions must be imposed on financial products or services.

13.不得有其他违反金融消费者权益保护等相关法律法规和监管规定的行为；不得有其他违反监管机构和本行相关规定的情形。

13. Financial product and service marketing and promotion must not involve any other actions that violate laws, regulations and supervisory provisions related to financial consumer rights and interests protection; or any other violations of regulators' requirements or the Bank's internal regulations.

## **(二) 部分营销宣传特定行为规范**

### **(II) Specific code of conduct for marketing and promotion of certain products and services**

1. 代销理财类产品（以下简称“理财产品”）。不得在不了解客户风险等级的情况下向客户推介和销售理财产品；不得以理财名义或使用“理财”字样开展其他金融产品销售业务活动；不得误导投资者购买与其风险承受能力不相匹配的理财产品；不得虚假宣传、片面或不当宣传,夸大过往业绩,预测理财产品的投资业绩,或者出具、宣传理财产品预期收益率；不得使用未说明选择原因、测算依据或计算方法的业绩比较基准，单独或突出使用绝对数值、区间数值展示业绩比较基准；不得将销售的理财产品与存款或其他产品进行混同；不得在理财产品销售过程中强制捆绑、搭售其他服务或产品；不得提供抽奖、回扣、馈赠实物、代金权益及金融产品等销售理财产品；不得违背投资者利益优先原则，为牟取机构或人员的利益,诱导投资者进行短期、频繁购买和赎回操作；不得由销售人员违规代替投资者签署销售业务相关文件,或者代替投资者进行风险承受能力评估、理财产品购买等操作，代替投资者持有或安排他人代替投资者持有理财产品；不得为理财产品提供直接或间接、显性或隐性担保,包括部分或全部承诺本金或收益保障；不得利用或承诺利用理财产品和理财产品销售业务进行利益输送或利益交换；不得给予、收取或索要理财产品销售合作协议约定以外的利益；不得恶意诋毁、贬低

其他理财产品销售机构或其他理财产品；不得截留、挪用理财产品销售结算资金；不得违法违规提供理财产品投资者相关信息；不得未经授权或超越授权范围开展销售业务，私自推介、销售未经本行准入的理财产品，通过营业网点或电子渠道提供未经本行审批的理财产品销售相关文件和资料；不得通过电视、电台、互联网等渠道对具体理财产品进行宣传，本行渠道(含营业网点和电子银行渠道)除外；未经投资者同意,不得通过本行电话、传真、短信、邮件等方式宣传理财产品。

1. For agency wealth management products (hereinafter referred to as “WMPs”), the following conducts are prohibited: recommend or sell WMPs to customers without understanding their risk tolerance levels; conduct sales activities for other financial products under the guise of wealth management or by using the term “wealth management”; mislead investors to purchase products incompatible with their risk tolerance; engage in false advertising, one-sided or improper promotion, exaggerate past performance, forecast investment returns, or publish or advertise expected yields of WMPs; use performance comparison benchmarks without explaining their selection rationale, calculation basis, or methodology, or display absolute values or range values for performance benchmarks in isolation or in a prominent manner; confuse WMPs with deposits or other financial products; forcibly bundle or tie the sale of other

services or products during WMP sales; offer prize draws, rebates, physical gifts, voucher benefits, or financial products as incentives for purchasing WMPs; prioritize institutional or personnel interests over investor interests by inducing short-term, frequent purchases and redemptions; violate regulations by signing sales-related documents on behalf of investors, conducting risk tolerance assessments or purchasing products on behalf of investors, holding WMPs for investors, or arranging third parties to hold such products; provide direct or indirect, explicit or implicit guarantees (including partial or full principal or return protection) for WMPs; exploit or promise to exploit WMPs or sales activities for improper transfer or exchange of benefits; offer, accept, or demand benefits beyond those stipulated in WMP sales agreements; maliciously denigrate or devalue other WMP sellers or products; withhold or misappropriate settlement funds for WMP sales; disclose WMP investors' information in violation of laws and regulations; conduct sales activities without authorization or beyond authorized scope, privately recommend or sell WMPs not approved by the Bank, or provide sales documents and materials of WMPs not approved by the Bank via outlets or electronic channels; advertise specific WMPs through TV, radio, or internet platforms (excluding the Bank's own channels, such as outlets and online banking channels); and promote WMPs via

the Bank's phone, fax, SMS, or email without investor consent.

2.零售信贷与信用卡业务。以明显方式展示贷款主体、实际年利率、年化综合资金成本和咨询投诉渠道等基本信息，保障客户的知情权和自主选择权，不得采取默认勾选、强制捆绑销售等方式剥夺消费者意愿表达的权利。向客户展示分期业务收取的资金使用成本时统一采用利息形式，并明确相应的计息规则，不采用手续费等形式，法律法规另有规定的除外。营销人员应当明确告知申请信贷业务需提交的申请资料 and 基本要求，督促申请人完整、正确、真实地填写申请材料，并审核身份证件（原件）和必要的证明材料（原件）。

2. Retail credit and credit card business. Basic information such as the loan entity, effective annual interest rate, annualized comprehensive funding cost, and consultation/complaint channels should be displayed clearly in a prominent manner to safeguard customers' right to know and their right to make unsolicited choices. Methods such as default selection or mandatory bundled sales must not be used to deprive consumers of their right to express their intentions. When presenting the cost of fund usage for installment plans to customers, interest-based calculations with explicit interest calculation rules shall be adopted, and fees or indicators shall not be used except where otherwise specified by laws and regulations. Marketing personnel shall clearly inform applicants of required application

documents and basic eligibility criteria, ensure that applicants completely, accurately, and truthfully fill out application materials, and review original identification documents and necessary supporting documents.

### **(三) 信息披露、查询规范**

#### **(III) Disclosure and inquiry standards**

1.产品及服务的信息披露。应遵循真实、准确、完整、及时原则，如实反映产品及服务的主要特性，合理揭示风险。

1. Disclosure of information related to products and services should adhere to the principles of authenticity, accuracy, completeness, and timeliness, truthfully reflecting the core features of the products and services while reasonably disclosing associated risks.

2.产品及服务信息披露时,不得进行欺诈、隐瞒或者误导性的宣传，不得作夸大产品收益或者服务权益、掩饰产品风险等虚假或者引人误解的宣传；对涉及利率、费用、收益及风险等与金融消费者切身利益相关的重要信息，应根据金融产品和服务的复杂程度及风险等级，对其中关键的专业术语以通俗易懂的语言进行解释说明，以便金融消费者接收、理解,并以适当方式供金融消费者确认其已接收完整信息。

2. Disclosure of information on products and services must not involve fraudulent, concealed, or misleading promotion, nor

false or misleading claims that exaggerate product benefits or service entitlements, or obscure product risks. For critical information (such as interest rates, fees, returns, and risks) directly affecting financial consumers' interests, explanations shall be tailored to the complexity and risk levels of the financial products/services, with key professional terms clarified in plain and accessible language to ensure comprehension. Appropriate mechanisms should be provided for financial consumers to confirm receipt and understanding of complete information.

## 六、审查与监测

### **VI. Review and Monitoring**

本行总行及各级机构与零售营销宣传相关部门负责审查本部门在官方渠道及平台发布的营销宣传材料等；负责对本条线零售营销宣传活动开展检查、监督工作。在检查过程中发现违反国家相关法律法规、监管规定及行内规章制度有关要求的，应当及时改正。本行总分行各级机构应按照法律法规及政策要求开展零售营销宣传管理，压实各级管理责任，对于违反法律法规和本行制度规定而引发后果的，将追究当事人及所在机构管理人责任，并依照本行相关制度予以问责和处罚。

Departments related to retail marketing and promotion at the Bank's Head Office and entities at all levels are responsible for reviewing their respective marketing and promotion materials released on official channels and platforms, as well as

inspecting and monitoring retail marketing and promotion activities. Any violation of national laws and regulations, regulatory requirements, or internal policies identified during inspections must be promptly rectified. All levels of the Head Office and branches shall conduct retail marketing and promotion management in compliance with laws, regulations, and policy requirements, ensuring clear accountability at all management levels. For any consequences arising from violations of laws, regulations, and the Bank's internal policies, the Bank will hold accountable both the individuals involved and their supervising managers, and impose disciplinary actions and penalties in accordance with the Bank's internal policies.

## 七、营销培训

### **VII. Marketing Training**

本行总行零售金融部牵头开展本行零售金融业务宣传材料相关的培训；各分行负责组织本分行零售营销宣传管理相关的培训。各级机构及时开展营销宣传行为合规培训，积极通过线上、线下等多种方式，对零售营销宣传行为开展合规培训，内容包括但不限于专业能力培训、合规宣传要点、员工禁止性行为、消费者权益保护、投诉处理技巧等。

The Bank's Head Office Retail Finance Department shall take the lead in organizing training related to promotion materials for retail financial business. Branches are responsible for conducting their respective training related to marketing and promotion management. Entities at all levels shall promptly

arrange compliance training for marketing and promotion activities, by actively utilizing various methods including online and offline training sessions. The content includes, but is not limited to, professional competency development, compliant promotion guidelines, prohibited conduct, consumer rights protection, and complaint handling techniques.

## 八、检视与更新

### **VIII. Review and Update**

本行将根据国家政策、监管要求、行业发展和内部管理需要，适时对本制度进行检视和更新。

Bank of Nanjing will periodically review and update the policies in accordance with national policies, regulatory requirements, industry development and internal operational needs.