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中国建设银行

China Construction Bank

中國建設銀行股份有限公司

China Construction Bank Corporation

(A joint stock company incorporated in the People's Republic of China with limited liability)

(Stock Code: 939)

Further Announcement on the Payment of 2010 H Share Dividend

Reference is made to the 2010 annual results announcement of China Construction Bank Corporation (the “**Bank**”) dated 27 March 2011 and the announcement dated 9 June 2011 in respect of the poll results of the annual general meeting for the year 2010 of the Bank. The Bank wishes to announce further information in relation to the payment of the 2010 H share dividend as follows.

The resolution relating to the Bank’s 2010 profit distribution plan was approved at the annual general meeting for the year 2010 of the Bank. The dividend for the year ended 31 December 2010 of RMB0.2122 per share (including tax) (the “**2010 Dividend**”) will be paid on Friday, 15 July 2011 to the shareholders whose names appear on the register of members of the Bank on 23 June 2011 (the “**Record Date**”). The 2010 Dividend payable by the Bank to holders of H shares in Hong Kong dollars shall be converted at the medium exchange rate between Hong Kong dollars and Renminbi as announced by the People’s Bank of China on 9 June 2011 (being the date on which the Bank’s annual general meeting for the year 2010 was held). Accordingly, the applicable exchange rate for the purpose of the payment of the 2010 Dividend is HK\$1=RMB0.83308, and the 2010 Dividend calculated based upon such exchange rate shall be Hong Kong Dollar 0.25471743 per share (including tax).

Due to the recent change of tax regulations in the People’s Republic of China (the “**PRC**”), the “Circular on the Questions Concerning Tax on the Profit Earned by Enterprises with Foreign Investment, Foreign Enterprises and Individual Foreigners from the Transfer of Stocks (Stock Rights) and on Dividend Income” (Guo Shui Fa【1993】No.45) (《關於外商投資企業、外國企業和外籍個人取得股票(股權)轉讓收益和股息所得稅收問題的通知》(國稅發【1993】45號)) issued by the State Administration of Taxation (the “**Circular**”) was repealed pursuant to the “Announcement on the List of Fully and Partially Invalid and Repealed Tax Regulatory Documents” (《關於公佈全文失效廢止、部份條款失效廢止的稅收規範性文件目錄的公告》). According to the Circular, individual foreigners who are holders of H shares are temporarily exempted from the PRC individual income tax in respect of the dividend paid by domestic enterprises which issued such H shares. As the Circular has been repealed, the Bank can no longer rely on the Circular as the basis for the individual shareholders who hold the Bank’s H shares and whose names appear on the register of members of H shares of the Bank on the Record Date (the “**Individual H Shareholders**”) to be exempted from the PRC individual income tax when the Bank distributes the 2010 Dividend.

Pursuant to the “PRC Individual Income Tax Law” (《中華人民共和國個人所得稅法》), the “PRC Implementation Regulations of the Individual Income Tax Law” (《中華人民共和國個人所得稅法實施條例》), the “Notice of the State Administration of Taxation in relation to the Administrative Measures on Preferential Treatment Entitled by Non-residents under Tax Treaties (Tentative)” (Guo Shui Fa【2009】No.124) (《國家稅務總局關於印發〈非居民享受稅收協定待遇管理辦法(試行)〉的通知》(國稅發【2009】124號)) (“**Tax Treaties Notice**”), other relevant laws and regulations and the relevant rules promulgated by the State Administration of Taxation, pursuant to the letter titled “**Tax arrangements on dividends paid to Hong Kong residents by Mainland companies**” issued by The Stock Exchange of Hong Kong Limited to the issuers on 4 July 2011, and based on the Bank’s further consultation with the relevant tax authorities, as the Circular has been repealed, it is confirmed that the Bank shall withhold and pay the individual income tax in respect of the dividend received by the Individual H Shareholders from the Bank. The Individual H Shareholders of the Bank may be entitled to certain tax preferential treatments pursuant to the tax treaties between the PRC and the countries in which the Individual H Shareholders are domiciled and the tax arrangements between Mainland China and Hong Kong/Macau. The Bank will determine the country of domicile of the Individual H Shareholders based on the registered address as recorded in the register of members of H shares of the Bank on the Record Date. Detail arrangements are as follows:

- For Individual H Shareholders who are Hong Kong or Macau residents and those whose country of domicile is a country which has entered into a tax treaty with the PRC stipulating a dividend tax rate of 10%, the Bank will withhold and pay individual income tax at the rate of 10% on behalf of the Individual H Shareholders. Based on the abovementioned dividend of RMB0.2122 per share (including tax), the amount of individual income tax to be withheld and paid by the Bank on behalf of the Individual H Shareholders will be RMB0.02122 (approximately HK\$0.02547174) per share.
- For Individual H Shareholders whose country of domicile is a country which has entered into a tax treaty with the PRC stipulating a dividend tax rate of lower than 10%, the Bank will withhold and pay individual income tax at the rate of 10% on behalf of the Individual H Shareholders. Based on the abovementioned dividend of RMB0.2122 per share (including tax), the amount of individual income tax to be withheld and paid by the Bank on behalf of the Individual H Shareholders will be RMB0.02122 (approximately HK\$0.02547174) per share. If relevant Individual H Shareholders would like to apply for a refund of the additional amount of tax withheld and paid, the Bank can assist the relevant shareholder to handle the application for the underlying preferential tax benefits pursuant to the tax treaties, provided that the relevant shareholder shall submit to the Bank the information required under the Tax Treaties Notice within the time period stated below. Upon examination and approval by competent tax authorities, the Bank will assist in refunding the additional amount of tax withheld and paid.
- For Individual H Shareholders whose country of domicile is a country which has entered into a tax treaty with the PRC stipulating a dividend tax rate of higher than 10% but lower than 20%, the Bank will withhold and pay individual income tax at the actual tax rate stipulated in the relevant tax treaty.

- For Individual H Shareholders whose country of domicile is a country which has entered into a tax treaty with the PRC stipulating a dividend tax rate of 20%, or a country which has not entered into any tax treaties with the PRC, or under any other circumstances, the Bank will withhold and pay individual income tax at the rate of 20% on behalf of the Individual H Shareholders. Based on the abovementioned dividend of RMB0.2122 per share (including tax), the amount of individual income tax to be withheld and paid by the Bank on behalf of the Individual H Shareholders will be RMB0.04244 (approximately HK\$0.05094349) per share.

If the domicile of an Individual H Shareholder is not the same as the country shown in the registered address of such shareholder as recorded in the register of members of H shares of the Bank or if relevant Individual H Shareholder would like to apply for a refund of the additional amount of tax withheld and paid, the relevant shareholder shall notify and provide relevant supporting documents to the Bank on or before 31 August 2011. Upon examination of the supporting documents by competent tax authorities, the Bank will strictly follow the guidance given by the tax authorities to implement relevant tax withholding provisions and arrangements. Individual H Shareholders may either personally or appoint a representative to attend to the procedures in accordance with the requirements under the Tax Treaties Notices if they do not provide the relevant supporting documents to the Bank within the time period stated above.

For non-resident enterprise holders of H shares, the Bank will withhold 10% of the dividend as enterprise income tax according to the relevant tax regulations in line with its previous practice.

Shareholders are recommended to consult their tax advisers regarding PRC, Hong Kong and other tax implications arising from their holding and disposal of H shares of the Bank.

By order of the Board of Directors
China Construction Bank Corporation
Zhang Jianguo
Vice Chairman, Executive Director and President

14 July 2011

As at the date of this announcement, the executive directors of the Bank are Mr. Guo Shuqing, Mr. Zhang Jianguo, Mr. Chen Zuofu and Mr. Zhu Xiaohuang; the independent non-executive directors of the Bank are Lord Peter Levene, Mr. Yam Chi Kwong, Joseph, Dame Jenny Shipley, Mr. Zhao Xijun and Mr. Wong Kai-Man; and the non-executive directors of the Bank are Mr. Wang Yong, Mr. Zhu Zhenmin, Ms. Li Xiaoling, Ms. Sue Yang, Mr. Lu Xiaoma and Ms. Chen Yuanling.