



Bank of Communications Co., Ltd.
2025 Sustainability Report

March 2026

About This Report

Scope

This Report includes information on Bank of Communications Co., Ltd. ("BoCom") and its subsidiaries.

It covers the period from January 1 to December 31, 2025, and may include additional information beyond this reporting period. BoCom publishes its Sustainability Report annually.

The *2025 Sustainability Report of Bank of Communications Co., Ltd.* was published on March 27, 2026.

References

This Report is prepared with reference to the *GRI Sustainability Reporting Standards* issued by the Global Sustainability Standards Board, the *Guidelines No. 4 of Shanghai Stock Exchange for Self-Regulation of Listed Companies—Compilation of Sustainable Development Reports* and the *Guidelines No. 14 of Shanghai Stock Exchange for Self-Regulation of Listed Companies—Sustainability Report (Trial)*, the *Environmental, Social and Governance Reporting Code* by Hong Kong Exchanges and Clearing Limited (HKEX), the *Sustainability Disclosure Standards for Business Enterprises—Basic Standard (Trial)* and the *Sustainability Disclosure Standards for Business Enterprises No. 1—Climate (Trial)* by the Ministry of Finance (MoF). It also aligns with relevant opinions and guidelines, including the *Opinions on Strengthening Social Responsibilities of Banking Financial Institutions*, the *Guidelines on Sustainability Information Disclosure for Financial Institutions*, and the *Guidelines on the Corporate Social Responsibility of Banking Financial Institutions of China*.

Principles

The reporting principles are as follows:

Materiality: This Report adheres to the materiality identification requirements set out in the *Guidelines No. 4 of Shanghai Stock Exchange for Self-Regulation of Listed Companies—Compilation of Sustainable Development Reports* and the *Guidelines No. 14 of Shanghai Stock Exchange for Self-Regulation of Listed Companies—Sustainability Report (Trial)*, the *Environmental, Social and Governance Reporting Code* by HKEX, and the *Sustainability*

Disclosure Standards for Business Enterprises—Basic Standard (Trial) by MoF. Through in-depth engagement and research with internal and external stakeholders, the Bank identifies environmental, social, and governance (ESG) factors that matter to stakeholders and defines the scope of this Report accordingly. The materiality analysis process and results, along with other content of this Report, are reviewed and approved by the Board of Directors ("Board").

Quantitative analysis: Some financial data in this Report is sourced from BoCom's financial statements for the year 2025 and independently audited by KPMG Huazhen LLP (Special General Partnership). Other data is primarily from 2025, with some from previous years.

Balance: This Report provides an objective picture of BoCom's performance, avoiding the use of any disclosure methods that could unduly influence readers' decisions or judgments.

Consistency: The statistical methodology used for data disclosure in this Report remains consistent with that of previous years. Any changes to statistical methodology or key performance indicators, or any other factors affecting meaningful comparability are clearly stated. All currency amounts are reported in RMB, unless otherwise specified.

Compilation Process

Based on BoCom's sustainability management strategies and practices, this Report is prepared following a structured process including project approval, information collection, drafting and revisions, review by the Senior Management, review by the Special Committee, review by the Board of Directors, and public disclosure. During key stages such as project approval and drafting, the Bank actively engages with stakeholders to solicit feedback and refine the structure and content of the Report.

Assurance

The KPMG Huazhen LLP (Special General Partnership) is entrusted to conduct an independent third-party assessment of this Report, in line with the *International Standard on Assurance Engagements (ISAE) 3000: Assurance Engagements Other than Audits or Reviews of Historical Financial Information*, and to issue an independent statement of assurance.

Format

This Report is available in both printed and digital formats. BoCom uses eco-friendly paper for all printed copies. The digital version can be accessed at www.bankcomm.com.

This Report is published in Chinese and English. In case of any discrepancy, the Chinese version shall prevail.

Abbreviation

For the purpose of this Report, Bank of Communications Co., Ltd. is referred to as "BoCom", "the Bank", or "we". The Bank and its subsidiaries are collectively referred to as "the Group".

"Bank of Communications (Hong Kong) Limited" is referred to as "BoCom (Hong Kong)".

"Bank of Communications (Brazil) Co., Ltd." is referred to as "BoCom (Brazil)".

"BOCOM Financial Technology Co., Ltd." is referred to as "BOCOM Fintech".

"Bank of Communications International Trust Co., Ltd." is referred to as "BOCOM International Trust".

"Bank of Communications Financial Leasing Co., Ltd." is referred to as "BOCOM Leasing".

"BOCOM International Holdings Company Limited" is referred to as "BOCOM International".

"China BOCOM Insurance Co., Ltd." is referred to as "BOCOM Insurance".

"BoCom Financial Asset Investment Co., Ltd." is referred to as "BOCOM Investment".

"Bank of Communications Schroder Fund Management Co., Ltd." is referred to as "BOCOM Schrodgers".

"BOCOM MSIG Life Insurance Company Limited" is referred to as "BOCOM MSIG Life".

"BOCOM Wealth Management Co., Ltd." is referred to as "BOCOM Wealth".

Contents

About This Report.....	1
Message from the Leadership.....	6
1 About BoCom.....	9
1.1 Company Profile.....	9
1.2 Key Performance Highlights.....	10
1.3 Honors.....	12
2 Governance.....	14
2.1 Improving Corporate Governance.....	14
2.2 Preventing Financial Risks.....	22
2.3 Enhancing Shareholder Returns.....	25
2.4 Anti-Commercial Bribery and Anti-Corruption.....	26
2.5 Anti-Unfair Competition.....	30
2.6 Due Diligence.....	30
2.7 Stakeholder Communication.....	30
3 Economy.....	34
3.1 Supporting the Real Economy.....	34
3.2 Technology Finance.....	44
3.3 Inclusive Finance.....	48
3.4 Rural Revitalization.....	55
3.5 Pension Finance.....	62
3.6 Digital Finance.....	65
3.7 Innovation-Driven Development.....	69
4 Environment.....	71
4.1 Response to Climate Change.....	71
4.2 Green Finance.....	92
4.3 Pollutant Discharge.....	106
4.4 Waste Disposal.....	107
4.5 Ecosystem and Biodiversity Conservation.....	109
4.6 Environmental Compliance Management.....	110
4.7 Energy Utilization.....	111
4.8 Utilization of Water Resources.....	113
4.9 Circular Economy.....	114
5 Society.....	116
5.1 Employees.....	116
5.2 Product and Service Security and Quality.....	129
5.3 Data Security and Customer Privacy Protection.....	142
5.4 Supply Chain Security.....	148
5.5 Fair treatment of SMEs.....	151
5.6 Ethics of Science and Technology.....	152
5.7 Social Contributions.....	152

Independent Assurance Statement 159
Foundations for Key Performance Data Compilation 160
Third-Party Statement on Greenhouse Gas Emissions and Energy Resource Data 165
Report Alignment with Regulatory Documents 166
GRI Content Index 169

Message from the Leadership

2025 marks the final year of China's 14th Five-Year Plan (2021-2025). Under the strong leadership of the CPC Central Committee with Comrade Xi Jinping at its core, we remained firmly committed to advancing financial development with Chinese characteristics while further strengthening a financial culture that underpins this approach. We implemented the "One-Four-Five" strategy (one strategic anchor, four distinctive business pillars, and five core capabilities) and achieved the main objectives set out in the Plan. Our overall capabilities were further strengthened, and we continued to make progress toward building a world-class banking group with distinctive strengths. In 2025, our total assets reached RMB 15.5 trillion, and net profit totaled RMB 95.622 billion. Our Tier 1 capital ranked 9th globally in The Banker's Top 1000 World Banks, marking our fourth consecutive year in the global top 10. We were also designated a Global Systemically Important Bank (G-SIB) for the third year in a row.

This year, in line with national priorities, we strengthened financial services to better support the real economy across key areas. We supported key national initiatives, including the "Two Priorities" to advance major national strategies and strengthen capacity in critical sectors; the "Two New" initiative focused on large-scale equipment upgrades and consumer trade-in; and the "Three Major Programs" aimed at developing affordable housing, redeveloping urban villages, and building dual-use infrastructure for both routine and emergency needs. Efforts to stimulate consumption were strengthened through new offerings such as "Government Subsidy Loan" and the launch of the "BoCom Benefit Loan" personal lending brand. We also introduced a cultural and tourism promotion campaign, alongside community-focused initiatives designed to improve everyday livelihoods. Measures were taken to enhance the accessibility of tax refunds for international visitors. Support for more balanced urban-rural and regional development remained a priority, with a focus on regions such as Beijing-Tianjin-Hebei, the Yangtze River Delta, and the Guangdong-Hong Kong-Macao Greater Bay Area (Greater Bay Area). We also contributed to Shanghai's development as a global center for finance, economy, trade, shipping, and innovation. Rural revitalization efforts progressed steadily, and our pairing assistance programs received top ratings for seven consecutive years. At the same time, we stepped up support for foreign trade and

investment by launching the "BOCOM Trade Link" platform, expanding digital applications in shipping and trade, and supporting companies in their international expansion.

We continued to advance the "Five Key Areas of Finance" and foster new quality productive forces. **In technology finance**, we deepened our partnership with the Torch Center under the Ministry of Industry and Information Technology, launching the "Five Ones" initiative. We also analyzed key industries, mapped out their ecosystems, and accelerated digital product development. By year-end, the balance of technology loans totaled RMB 1.58 trillion. **In green finance**, we expanded our product offering, refined our organizational structure, and advanced the development of transition finance, bringing the balance of green loans to RMB 950.825 billion on a PBOC-defined basis at year-end. **In inclusive finance**, support for SMEs was strengthened through coordinated financing mechanisms, broadened outreach to businesses and individuals, and wider adoption of proactive credit models. By 2025, the balance of inclusive loans to SMEs reached RMB 908.435 billion. **In pension finance**, we focused on pensions, annuities, the silver economy, and related service models, increasing credit support for the elderly care sector. We also promoted the consumption of elderly care services and further diversified product offerings. As a result, our loans to the elderly care industry grew by 49.12% in 2025. **In digital finance**, we enhanced our digital service ecosystem, advanced innovative applications of digital technologies and data, and continued to expand our suite of "Digital+" products.

Guided by a commitment to "finance for good", we continued to promote sustainable development for our clients, employees, and communities. Throughout the year, we carried out a wide range of financial education initiatives, reaching 1.49 billion consumer interactions and helping improve financial literacy and raise risk awareness through multi-tiered, well-structured content. We placed a strong emphasis on employee well-being by providing open, diversified development platforms, safeguarding employees' rights and interests, and aligning individual growth with the Bank's long-term development. We actively engaged in social responsibility initiatives. In 2025, we undertook 216 charitable programs. Our employees contributed 390,821 hours of volunteer service for disability support, poverty alleviation, disaster relief, and environmental protection. We also responded promptly to emergencies, including the earthquake in Tingri County, Xigaze, and a major fire in Tai Po, Hong Kong, providing timely assistance and

support to affected communities. We have now supported people with disabilities for 18 consecutive years. Through programs such as the "Beautiful Crafts Workshop", we have helped women with disabilities gain employment and increase their incomes. Our original charity song, *As Beautiful as She Is*, was performed at the United Nations Headquarters. We also continued to support the National Vocational Skills Competition for Persons with Disabilities, helping participants develop their skills and build meaningful careers, and supported the National Games for Persons with Disabilities and the National Special Olympic Games to create opportunities for athletes to pursue their dreams. In recognition of these efforts, we were awarded the title of "National Model Unit for Work on Persons with Disabilities" at the 7th National Conference Recognizing Role Models with Disabilities and Outstanding Contributors to Disability Support.

Looking ahead, we face both opportunities and challenges. Guided by a shared sense of responsibility and vision, we will continue to closely align with the CPC Central Committee with Comrade Xi Jinping at its core, uphold a sound approach to performance and development, and remain committed to the path of financial development with Chinese characteristics. We will drive innovation and deliver tangible results, working with determination and unity to secure a strong start to the 15th Five-Year Plan (2026–2030) and advance high-quality development in the years ahead.

Ren Deqi, Party Secretary and Chairman of the Board of Directors of the Bank

Zhang Baojiang, Deputy Party Secretary and President of the Bank

1 About BoCom

1.1 Company Profile

Founded in 1908, BoCom is one of the longest-standing banks in China. After restructuring, it resumed operations on April 1, 1987, as the country's first nationwide state-owned joint-stock commercial bank, with its Head Office in Shanghai. The Bank was listed on the HKEX in June 2005 and the SSE in May 2007. In 2023, it was recognized as a Global Systemically Important Bank (G-SIB). By Tier-1 capital ranking, BoCom is the 9th largest bank globally.

BoCom strives to become a world-class banking group with distinctive strengths, integrating sustainability into every aspect of its operations. While focusing on four key areas — inclusive finance, trade finance, technology finance, and wealth finance—the Bank continually enhances its expertise in customer management, technological innovation, risk management, collaborative operations, and resource allocation. Rooted in Shanghai, we are committed to driving digital transformation and innovation to lead high-quality development.

As of the end of the reporting period, the Bank provided comprehensive financial services to 3.07 million corporate clients and 205 million retail customers. Approved by the National Financial Regulatory Administration (NFRA), these services were available through various online channels, including mobile and online banking, as well as an extensive network of more than 2,800 outlets on the Chinese mainland, 24 branches, subsidiaries, and representative offices outside the Chinese mainland. Our diverse offerings included deposits and loans, industrial chain finance, cash management, international settlements and trade financing, investment banking, asset custody, wealth management, bank cards, private banking, and treasury business. Through wholly-owned or controlling subsidiaries, the Group operates in financial leasing, fund management, wealth management, trust services, insurance, securities outside the Chinese mainland, debt-to-equity swaps, and other areas.

As a long-established, major state-owned banking group, we remain a key supporter of the real economy and a pillar for financial stability. With a steadfast strategic focus, we prioritize risk prevention and mitigation to ensure resilience. In addition, we are committed to delivering high-quality financial services to customers, creating greater value for shareholders, fostering a

rewarding workplace for employees, and making a meaningful contribution to society.

During the reporting period, the Group's operating model, main businesses, and key performance drivers experienced no significant changes.

1.2 Key Performance Highlights

Indicators		2023	2024	2025
Economic	Total assets (RMB billion)	14,060.472	14,900.717	15,548.388
	Total loans (RMB billion)	7,957.085	8,555.122	9,123.571
	Net profits of the Group (RMB billion)	92.728	93.586	95.622
	Total taxes paid (RMB billion)	30.440	32.391	28.270
	Total dividends (RMB billion)	27.849	28.146	28.691
	Dividend per share (RMB)	0.375	0.379	0.325
	Return on average assets (%)	0.69	0.65	0.63
	Return on average equity (%)	9.68	9.08	8.38
	Non-performing loan ratio (%)	1.33	1.31	1.28
	Provision coverage ratio (%)	195.21	201.94	208.38
	Capital adequacy ratio (%)	15.27	16.02	15.96
	Tier-1 capital adequacy ratio (%)	12.22	12.11	12.70
	Core tier-1 capital adequacy ratio (%)	10.23	10.24	11.43
	Total assets of banking institutions outside the Chinese mainland (RMB billion)	1,249.946	1,266.251	1,250.986
	Total profits from banking institutions outside the Chinese mainland (RMB billion)	5.318	10.389	11.157
	Total assets of controlled non-bank subsidiaries (RMB billion)	650.999	736.009	768.981
	Total profits from controlled non-bank subsidiaries (RMB billion)	9.081	9.185	9.955
	Balance of loans and advances to micro-, small- and medium-sized enterprises (RMB billion)	2,760.982	2,972.323	3,225.865
	Balance of agriculture-related	978.137	841.367	833.373

	loans (RMB billion)			
	Balance of loans and advances to science, education, culture, and health sectors (RMB billion)	141.254	151.490	178.108
	Balance of personal loans (RMB billion)	2,473.100	2,752.406	2,835.038
	Number of outlets on the Chinese mainland	2,834	2,818	2,821
Social	Social contribution value per share (RMB)	6.10	5.96	4.69
	Total employees of the Group (persons)	94,275	95,746	97,932
	Female representation in middle and senior management (persons)	2,936	2,953	3,113
	Employees from ethnic minorities (persons)	4,378	4,518	4,725
	Average training hours per employee	123	111	127
	Donations (RMB million)	58.3622	58.8399	64.7326
Environmental	Balance of green loans (RMB billion)	822.042	892.608	950.825
	E-banking business share (%)	98.09	97.85	97.92
	Water consumption by the Group (tonnes)	3,574,190	3,678,793	3,897,861.45
	Electricity consumption by the Group (KWh)	659,263 (MWh)	760,385 (MWh)	771,854,227.50
	Natural gas consumption by the Group (m ³)	574 (10 ⁴ m ³)	586 (10 ⁴ m ³)	5,825,162.40
	Office paper consumption by the Group (tonnes)	1,802	1,785	1,554.80
	Total greenhouse gas emissions by the Group (tCO ₂ e)	444,059	487,403	487,944.25
	Comprehensive energy consumption by the Group (tce)	107,028	101,247	108,507.64
	Hazardous waste disposed of by the Head Office (tonnes)	1.45	0.4	1.57

Number of video conferences held across the Bank	43,084	176,524	232,159
Power usage effectiveness (PUE) of data centers	1.55	1.54	1.48

1.3 Honors

(The following awards are part of the overall list, shown in no particular order.)

2025 Rankings/Honors	Organizers or Awarding Institutions
Comprehensive Ranking	
The 2025 List of Global Systemically Important Banks (G-SIBs)	Financial Stability Board (FSB)
Top 1,000 World Banks 2025 (No. 9)	The Banker
Business Awards	
National Model Organization for Work on Persons with Disabilities	State Council Working Committee on Disability, Ministry of Human Resources and Social Security, China Disabled Persons' Federation
First Prize of Fintech Development Award	The People's Bank of China (PBOC)
First Prize of Shanghai Financial Innovation Award	Shanghai Municipal People's Government
"2025 Digital Banking Excellence Award"—Corporate Mobile Banking Trailblazer	China Financial Certification Authority (CFCA)
"Annual Gala of Building a Financial Powerhouse": Digital Finance Case of the Year	CCTV Finance
Institution of the Year for Excellence in the "Five Key Areas of Finance"	Yicai
Golden Tripod Award: Annual Outstanding Fintech Company	National Business Daily
Excellence Award for Advancing the "Five Key Areas" in China's Financial Market	Securities Times
Consumption Scenario Innovation Award	Sina Finance

Top Financial Institutions in China 2025: 2025 Outstanding Financial Institution for Consumer Protection, 2025 Mobile Banking App, 2025 Fintech Institution	Cailianpress.com
Best Inclusive Finance Project in China	The Asian Banker
Brand Awards	
Social Responsibility—Rural Revitalization Case Craftsmanship Excellence Brand Award	People's Daily Online
Jinnuo Annual Award for Financial Brand Influence Cases and Financial Brand Innovation Cases	China Banking and Insurance News
Brand Value List of Chinese Listed Companies Chinese Listed Companies: Yangtze River Delta Brand Pioneer of the Year	National Business Daily
2025 Financial Institutions with Outstanding Competitiveness in Brand Building	China Business Journal
China's Financial Annual Champion Awards: Most Influential Bank Brand of 2025	hexun.com
Excellent Cases of Social Welfare Brand Communication Excellent Cases of Digital and Innovative Brand Communication	JRJ.com
GoldenBee Excellent Sustainability Report 2025: Evergreen Award	GoldenBee Think Tank

2 Governance

Embracing Sustainable Development Trends

The Bank continues to strengthen governance and decision-making mechanisms. We prevent and control financial risks in a structured manner and work to enhance shareholder returns. We strictly adhere to regulations against commercial bribery, corruption, and unfair competition, incorporating compliance reviews and due diligence into all business operations. Additionally, we have established a mechanism for stakeholder communication. All those efforts support the high-quality development of the Bank.

Aligning with SDGs



Sustainable Development Issues

Improving corporate governance; Preventing financial risks; Enhancing shareholder returns; Anti-commercial bribery and anti-corruption; Anti-unfair competition; Due diligence; Stakeholder communication

Our performance

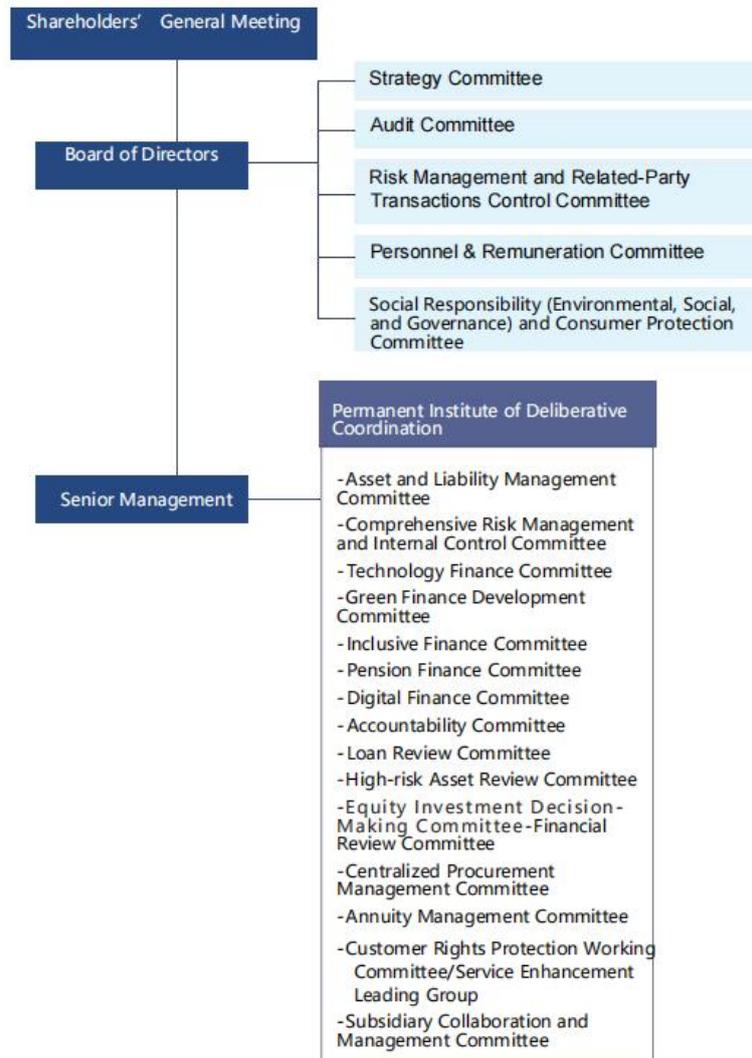
Board of Directors Meetings: 9; Reviewed proposals: 97. Shareholders' General Meetings: 5; Reviewed proposals: 29.

2.1 Improving Corporate Governance

2.1.1 Governance

The Bank strengthens the leadership of the Party in improving corporate governance, and is always committed to building a sound corporate governance mechanism. We continue to strengthen the corporate governance framework. The Shareholders' General Meeting, the Board, and the Senior Management have clearly defined roles and responsibilities and perform their respective duties under a modern governance model built on "statutory authority, transparent rights, coordinated operations, and effective balances" to ensure sound and efficient governance.

To enhance governance effectiveness, the Bank places great emphasis on strengthening the professional capabilities of directors and the Senior Management. Through structured training programs, the Bank continues to improve their professional expertise and decision-making effectiveness.



Governance structure of BoCom

The Bank is committed to establishing a management system for business ethics. The Board bears the ultimate responsibility for managing operational, compliance, case prevention, and money laundering risks, and is responsible for reviewing and approving compliance policies as well as overseeing their implementation. The Risk Management and Related-Party Transactions Control Committee under the Board oversees and evaluates risk control and management across operations, compliance, case prevention, outsourcing, and anti-money laundering (AML).

2.1.1.1 Shareholders' General Meeting

The Shareholders' General Meeting represents the highest governing authority of the Bank. It elects and replaces directors other than employee representatives, determines directors' compensation, and reviews and approves the Board's work reports, nomination proposals, and other matters. As of the end of the reporting period,⁵ Shareholders' General Meetings were convened, and 29 proposals were reviewed and approved.

2.1.1.2 Board of Directors

As the Bank's primary decision-making body, the Board plays a critical role in strategic planning and risk prevention. It regularly reviews reports from the Senior Management on the implementation of resolutions adopted by the Shareholders' General Meeting and the Board, along with updates on authorized operations and the execution of directors' opinions. These mechanisms enhance oversight of decision implementation and ensure effective follow-through and accountability. The Bank is dedicated to building an independent, professional, and diversified Board, which enables us to draw on broad perspectives and deep experience to make independent, prudent, and sound decisions on significant matters.

- **Expertise**

The professional backgrounds of our directors support our work in ESG. When reviewing proposals and participating in research and consultation activities, the directors provide focused and well-informed advice. Their expertise supports the implementation of our strategy and major transaction decisions. Among them, independent director Dr. Ma Jun brings extensive expertise in ESG and green finance research and practice. He serves as Co-Chairman of the Green Investment Principles (GIP) Steering Committee for the "Belt and Road", Chairman of the Hong Kong Green Finance Association, and Chairman of the Capacity-building Alliance of Sustainable Investment (CASI). Independent director Liu Ruixia is the Chief Expert of the China Banking Association (CBA)'s Expert Working Group for China's Banking Industry in Supporting the Achievement of Carbon Peaking and Carbon Neutrality Goals, and Chief Expert of the CBA Green Credit Committee.

- **Diversification**

The Bank's Personnel & Remuneration Committee approves and amends the *Board Diversity Policy*, and evaluates its implementation. In selecting Board candidates, the Bank considers diversified factors such as gender, age, cultural and educational background, and professional experience. As of the end of the reporting period, there were 2 female directors on the Board.

2.1.1.3 Specialized Committees

The Board has set up the Strategy Committee, the Audit Committee, the Risk Management and Related-Party Transactions Control Committee, the Personnel & Remuneration Committee, and the Social Responsibility (Environmental, Social, and Governance) and Consumer Protection Committee. Among them, the Personnel & Remuneration Committee performs both nomination and remuneration functions. The Risk Management and Related-Party Transactions Control Committee oversees improvements to the related-party transaction management framework, standardizes management processes, and strengthens supervision of these transactions. Starting from September 2025, the Audit Committee has assumed the statutory functions previously performed by the Board of Supervisors. Its oversight covers finance and capital, risk, internal control and compliance, among others. The committee also extends its oversight to all relevant areas of ESG management through a performance supervision and assessment system.

2.1.1.4 Senior Management

The Senior Management is the Bank's executive body and is accountable to the Board. Its responsibilities include, but are not limited to, overseeing day-to-day operations and implementing resolutions adopted by the Shareholders' General Meeting and the Board. Each quarter, the Senior Management submits a *Comprehensive Risk Assessment Report* to the Risk Management and Related-Party Transactions Control Committee. The report covers internal control, risk, and compliance performance, providing the Board with continuous visibility into these areas. The Senior Management strengthens follow-up on the Board's resolutions, tracks the execution of directors' opinions, and defines specific action plans to ensure effective implementation. As of the end of the reporting period, the Senior Management consisted of 11 members.

2.1.2 Strategy

The Board formulates the Bank's five-year development plans and annual business plans, ensuring that strategic goals are cascaded and effectively implemented across the organization. Under the Board, the Strategy Committee examines the Bank's overall development strategy and medium- to long-term plans, as well as development across key strategic areas such as technology finance, green finance, inclusive finance, pension finance, and digital finance. The committee regularly reviews and independently evaluates the Bank's strategy implementation and provides timely recommendations to the Board to ensure that the strategy remains responsive and well executed in support of the Bank's high-quality growth.

2.1.3 Management of Impacts, Risks, and Opportunities

The Bank continues to strengthen the financial risk management system by clearly defining risk appetite and limits, enhancing internal controls and compliance oversight, and reinforcing audit and supervisory functions, in order to safeguard against major and systemic risks. (For more information on risk management as part of "Improving Corporate Governance", please refer to the "Preventing Financial Risks" section.)

2.1.4 Indicators and Targets

The Bank maintains a highly professional and gender-diverse board of directors comprising diverse genders, ages, cultural and educational backgrounds, and professional, , which brings diverse and inclusive perspectives to decision-making and ensures robust governance. This ensures long-term value creation and strengthens shareholder confidence. The Board currently comprises 15 members, including 4 executive directors, 5 non-executive directors, and 6 independent directors. Independent directors make up 40% of the Board. In addition, there are 2 female directors. As of the end of the reporting period the Board convened 9 meetings and reviewed 97 proposals.

2.1.5 Remuneration System

The Bank has established a sound remuneration management framework, including deferred

compensation and clawback arrangements for performance-based salaries, as well as medium- and long-term incentive mechanisms, to support sustainable development.

- The Shareholders' General Meeting exercises the decision-making power over directors' remuneration, ensuring effective shareholder supervision over director remuneration distribution in strict compliance with the *Company Law* and other applicable regulations. Each year, we formulate remuneration plans for directors and the Senior Management based on regulatory requirements and our remuneration policies, and submit such plans to the Board for review. The remuneration plan for directors is further submitted to the Shareholders' General Meeting for approval. These plans will be publicly disclosed after completing the required corporate governance procedures.
- The Bank has formulated and improved the *Management Measures of BoCom for Deferred Payment and Clawback of Performance-based Salaries*, establishing deferral and clawback arrangements for the Senior Management and personnel in key positions across the Group. Over 40% of their performance-based compensation is deferred for a minimum period of three years. In subsequent years, the deferred amounts may be reduced or clawed back in cases of excessive risk exposures or violations of laws, regulations, and disciplinary rules.
- In the performance assessment of key management personnel, the Bank has introduced quantitative indicators, including the share of green finance in overall operations and value creation attributable to green finance. Assessment results are linked to compensation to support the Bank's sustainable development strategy and the effective implementation of relevant management measures.

2.1.6 ESG Management System

The Bank actively advances sustainable development and continues to strengthen the ESG governance framework. ESG management is embedded across business operations to ensure consistent and standardized implementation.

CSR (ESG) management system of BoCom

Board of Directors	<ul style="list-style-type: none"> ● Serves as the highest decision-making body for the Bank's ESG governance; bears ultimate responsibility for formulating, implementing, overseeing, and evaluating the effectiveness of the Bank's ESG strategy, climate-related risk
--------------------	--

	<p>management policies, and "dual carbon" action plans; and ensures that green and low-carbon principles are embedded across business operations and management.</p> <ul style="list-style-type: none"> ● Reviews the Bank's ESG policies, objectives, and related matters; formulates the Bank's green finance development strategy; and reviews major matters such as the strategic development plan and basic management policies for inclusive finance.
<p>Social Responsibility (Environmental, Social, and Governance) and Consumer Protection Committee</p>	<ul style="list-style-type: none"> ● Formulates ESG strategies, policies, plans, and measures tailored to the Bank's operations; regularly reviews progress toward ESG goals; submits the annual sustainability report to the Board; develops and evaluates measures to enhance ESG performance and promote ESG disclosure; reviews strategies, policies, and objectives related to consumer rights protection and submits related updates and annual reports to the Board. ● Regularly reviews reports from the Senior Management on ESG strategy implementation, green finance, climate risk management, social responsibility, and consumer rights protection; provides guidance and oversight on related work; and approves external donations as authorized by the Board.
<p>Strategy Committee</p>	<ul style="list-style-type: none"> ● Regularly reviews and evaluates the development of key businesses such as green finance and inclusive finance; and strengthens coordination and organizational supports to promote their coordinated, sustainable, and sound development.

Double-Materiality Topic Management

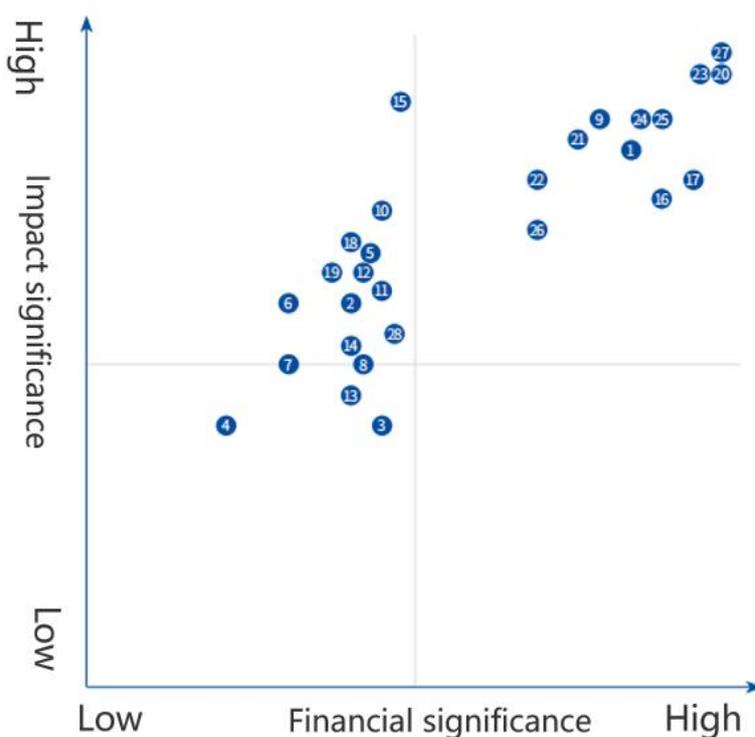
Double-materiality assessment process

1. Engaging with stakeholders: The Bank reviewed national policies and regulatory requirements and analyzed the external operating environment to identify key internal and external stakeholders, including customers, shareholders, government authorities, employees, communities, partners, and social organizations.

2. Developing the topic list: The Bank drew on the 21 topics outlined in the *Guidelines No. 14 of Shanghai Stock Exchange for Self-Regulation of Listed Companies—Sustainability Report (Trial)*. Taking into account regulatory requirements, ESG rating standards, the characteristics and development stage of the banking sector, as well as the Bank's business model and strategic planning, and benchmarking against peers, the Bank also identified additional topics with financial or impact materiality. This process resulted in a final list of 28 topics.

3. Assessing and confirming material topics: The Bank organized relevant departments to analyze the impacts, risks, and opportunities associated with the 28 identified topics, considering characteristics of the banking industry and the Bank's business operations. Employing quantitative methods, the Bank assessed the financial and impact materiality of each topic, and incorporated stakeholder feedback and expert input. The results were integrated into a double-materiality matrix, which was then submitted to the Board for approval.

4. Disclosing material topics: This Report provides detailed information on how material topics are managed and addressed. For topics identified as financially material, disclosures are structured around four dimensions: "Governance", "Strategy", "Impacts, Risks and Opportunities Analysis", and "Indicators and Targets".



BoCom 2025 Double-Materiality Matrix

1. Response to climate change	2. Pollutant discharge	3. Waste disposal	4. Ecosystem and biodiversity conservation	5. Environmental compliance management	6. Energy utilization
-------------------------------	------------------------	-------------------	--	--	-----------------------

7. Utilization of water resources	8. Circular economy	9. Rural revitalization	10. Social contributions	11. Innovation-driven development	12. Ethics of science and technology
13. Supply chain security	14. Fair treatment of SMEs	15. Product and service security and quality	16. Data security and customer privacy protection	17. Employees	18. Anti-commercial bribery and anti-corruption
19. Anti-unfair competition	20. Green finance	21. Supporting the real economy	22. Pension finance	23. Technology finance	24. Digital finance
25. Inclusive finance	26. Improving corporate governance	27. Preventing financial risks	28. Enhancing shareholder returns		

"Due diligence" and "stakeholder communication" are sustainability management methods and are not presented in this matrix. "Due diligence" is disclosed on page 30, and "stakeholder communication" is disclosed on page 30-33.

2.2 Preventing Financial Risks

The Bank places risk management at the core of financial operations and focuses on preventing and mitigating major financial risks. To that end, the Bank continues to refine the risk management framework and advance the digital and intelligent transformation of risk management, thereby safeguarding against systemic financial risks.

2.2.1 Governance

The Board assumes the ultimate responsibility for risk management and exercises the highest decision-making authority. It maintains oversight of the Bank's risk profile through its Risk Management and Related-Party Transactions Control Committee. The Senior Management is responsible for implementing Bank-wide risk management, and executing the Board's resolutions. The Bank has established the Comprehensive Risk Management and Internal Control Committee,

along with two specialized business review committees: the Loan Review Committee and the Risk Asset Review Committee. These committees support collective decision-making and professional risk review, thus strengthening risk assessment, improving the quality and efficiency of business approvals, and enhancing risk monitoring, control, and resolution in key areas. Provincial branches directly managed by the Head Office, banking institutions outside the Chinese mainland, and all subsidiaries operate under the same governance framework and have established their own Comprehensive Risk Management and Internal Control Committees and business review committees.

2.2.2 Strategy

The Bank has identified a range of risks, including credit risk, market risk, liquidity risk, interest rate risk in the banking book, IT risk, strategic risk, reputational risk, country-specific risk, and climate risk. These risks are continuously monitored, and reported in order to evaluate their potential medium- to long-term impacts and opportunities, and to inform appropriate response strategies, thereby strengthening the Bank's risk resilience. During the reporting period, the Group maintained a strong focus on preventing major risks while balancing business development with security. Under the Group's unified risk management framework, asset quality was steadily reinforced, oversight in key areas was strengthened, and integrated risk management across all risk types, entities and products was further enhanced to support the Bank's high-quality development.

The Bank continues to advance the digital and intelligent transformation of risk management practices. Guided by market, customer and frontline needs, we respond to evolving internal management requirements, external regulatory developments, and breakthroughs in technology. We are building an end-to-end, Bank-wide digital framework, strengthening our risk data infrastructure, enhancing enterprise-level applications, and promoting the sharing and broader use of risk capabilities. We are also exploring the use of artificial intelligence (AI) to support these efforts and further improve the effectiveness of risk control. During the reporting period, the Bank strengthened the role of the Risk Measurement Center, expanded the use of risk measurement

models in strategic areas, enhanced model-based risk management, and continued to improve the risk monitoring system. These efforts strengthened the Group's capabilities in risk measurement and monitoring, thus supporting high-quality business growth. In line with regulatory requirements, the Bank also continued to advance implementation of new capital rules.

2.2.3 Management of Impacts, Risks, and Opportunities

The Bank continues to refine the credit policy framework to strengthen support for the "Five Key Areas of Finance" and enhance the prevention and control of financial risks in priority sectors. We improve the quality and efficiency of credit approvals and advance risk mitigation in those sectors, while coordinating responses to both internal and external risk challenges. We also strengthen compliance and AML management by implementing the latest regulatory requirements and updating key policies. We reinforce oversight and issue remediation, enhance the accountability framework for violations, and maintain strong vigilance against operational risk incidents.

- **Intensifying Compliance Management**

The Bank has established a compliance management system commensurate with our business scale, scope of operations, and risk profile. We continuously strengthen our capabilities in identifying, monitoring, and preventing compliance risks, enhancing management quality and efficiency to ensure lawful and compliant operations as well as high-quality development. The Bank has formulated the *Compliance Management Measures of Bank of Communications Co., Ltd.* and other policies to strengthen internal control and compliance oversight, enhance issue rectification, and improve evaluation and accountability mechanisms. We also continue to foster a strong culture of internal control and compliance, advance the digital transformation, and further strengthen our compliance governance.

- **Strengthening Audit and Supervision**

The Bank regards internal audit as a key safeguard for sound financial operations and works to ensure that audit activities remain responsive, ongoing, and effective. We continue to strengthen oversight of risk management and internal controls, further enhancing the structure, foresight and

value contribution of audit oversight. As of the end of the reporting period, the Bank conducted comprehensive reviews of 9 provincial branches, 6 banking institutions outside the Chinese mainland, and 2 subsidiaries, and carried out dedicated audits on 33 businesses.

2.2.4 Indicators and Targets

The Board has defined the Bank's overall risk appetite in the principles of "stability, balance, compliance, and innovation". We have established specific risk limit indicators for credit, market, operational, and liquidity risks, as well as interest rate risk in the banking book, IT risk, and country-specific risk. These indicators are regularly monitored, with proactive management measures in place to ensure strict risk control. The Bank has established comprehensive mechanisms for training, communication, incentives, and supervision to ensure that all employees actively uphold, promote, and practice a strong risk culture. During the reporting period, the Risk Management Training Center conducted 94 training programs, benefiting 24,000 managers and employees. This included a total of 141 hours of online courses and 615 hours of in-person training. The "President's Talk on Internal Control and Compliance" series reached over 67,000 individuals, and the "Internal Control and Compliance Forum" engaged more than 83,000 participants.

2.3 Enhancing Shareholder Returns

The Bank is committed to sharing operational success with investors. To stay connected with retail investors, the Bank utilizes online platforms, including the SSE's E-Interaction platform, virtual investor receptions, results briefings, hotlines, and investor email services, to maintain an active market presence. The Bank also engaged with retail investors through in-person meetings, providing timely and comprehensive responses to their inquiries on the Bank's development strategy, operating performance, share price, and valuation. As of the end of the reporting period, we organized and participated in over 80 investor activities, comprising 61 in-person meetings and 19 online sessions, engaging with over 550 institutional investors in in-depth discussions.

Key Performance Highlights

As of the end of the reporting period,
--

The Bank distributed cash dividends of RMB 0.379 per ordinary share (including tax) for 2024, totaling RMB 28.146 billion.

This represented 32.68% of the net profit attributable to ordinary shareholders of the parent company.

Dividends totaling RMB 1.8315 billion were distributed to preferred shareholders in the Chinese mainland.

2.4 Anti-Commercial Bribery and Anti-Corruption

2.4.1 Anti-Corruption

The Bank maintains rigorous compliance with Party regulations and national laws, such as the *Code of Integrity and Self-Discipline of the Communist Party of China*, the *Regulations on Internal Supervision of the Communist Party of China*, the *Supervision Law of the People's Republic of China*, the *Implementation Regulations of the Supervision Law of the People's Republic of China*, and the *Rules on Integrity of Executives of State-Owned Enterprises*. The Bank has revised over 10 internal systems to further strengthen political oversight, reinforce discipline and integrity, and advance anti-corruption efforts. Commercial bribery and corruption are strictly prohibited. We provide anti-commercial bribery and anti-corruption training to all leaders at Grade C and above and all discipline inspection personnel across the Bank, as well as dispatched employees. As of the end of the reporting period, Party committees at all levels held 601 dedicated education sessions, while Party committee secretaries delivered 292 integrity-themed Party lectures.

The Bank also continues to strengthen audit and supervision of employee conduct and business ethics. Monitoring of employee behavior is integrated into comprehensive audits of operating entities and specialized audits across business areas. Each year, potential misconduct identified during audits is referred to the relevant discipline inspection and supervision authorities according to personnel management authority, and handled in accordance with applicable regulations, disciplinary rules, and laws.

Anti-corruption initiatives

- The Bank focused political oversight on 6 key areas, namely, upholding the centralized and

unified leadership of the CPC Central Committee, supporting the real economy, effectively preventing and controlling risks, strengthening the development of the leadership team, fostering a financial culture for the new era, and improving the supervision system.

- The Bank advanced education and learning of the Party's Eight-Point Decision, convened dedicated education sessions, and compiled case studies for disciplinary education. A total of 106 violations of the Eight-Point Decision were investigated and addressed, with 137 individuals subjected to criticism, education, or disciplinary action. Among these, 99 received Party disciplinary measures.
- During the reporting period, disciplinary actions were taken against a total of 1,390 individuals under the "four forms" of oversight and discipline enforcement.

Key Performance Highlights

As of the end of the reporting period,

Anti-corruption training sessions for directors and employees: 35

Number of directors and employees participating in anti-corruption training: 12,455

Total training hours attended by directors and employees: 21,650

Percentage of executive directors covered by anti-commercial bribery and anti-corruption training: 100%

Concluded cases of corruption-related litigation: 0

2.4.1.1 Whistleblower Protection

The Bank has established accessible reporting channels in line with relevant regulations, including the *Rules for Handling Reports and Accusations by Discipline Inspection and Supervision Organs*, the *Measures for Handling Whistleblower Reports by the Discipline Inspection and Supervision Group of the Central Commission for Discipline Inspection (CCDI) and the National Supervisory Commission (NSC) in Bank of Communications*, and the *Provisions of BoCom on Complaint Letters and Visits*. The Audit Committee under the Board publicly discloses its email address, allowing employees, partners, third parties, and the public to report concerns about the Bank. The reporting mechanism covers matters related to financial reporting,

internal controls, and other misconduct, and all reported cases are subject to independent and impartial investigation. Furthermore, the Bank protects whistleblowers in strict accordance with the *Regulation on Complaint Letters and Visits* and the *Rules for Handling Reports and Accusations by Discipline Inspection and Supervision Organs*, ensuring that all reports and accusations are handled appropriately. Whistleblower confidentiality is strictly protected, and no report, evidence, or related information shall be forwarded or disclosed to the accused individual or entity.

2.4.1.2 Anti-Corruption Management of Suppliers

The Bank strictly adheres to regulations such as the *Management Measures of BoCom for Centralized Procurement* and the *BoCom Supplier Management Measures*, requiring necessary actions to address any misconduct by suppliers. Suppliers found to have engaged in improper economic dealings with any employee of the Bank or their relatives, commercial bribery, commercial fraud, or other violations of laws and regulations are dealt with in accordance with applicable laws and regulations. The Bank maintains a zero-tolerance policy toward corruption in procurement activities, and any such misconduct is handled strictly in accordance with the law. Requirements for suppliers to comply with applicable laws and regulations and to refrain from commercial corruption are also clearly set out in procurement documentation.

2.4.2 Anti-Money Laundering

The Bank complies with the *Anti-Money Laundering Law of the People's Republic of China*, the *Counter-Terrorism Law of the People's Republic of China*, and other applicable laws and regulations, as well as internal policies such as the *Strategies, Policies, and Procedures for Money Laundering Risk Management of Bank of Communications (2025)* and the *Anti-Money Laundering Management Measures of Bank of Communications*. During the reporting period, the Bank updated relevant policies, including the *Strategies, Policies, and Procedures for Money Laundering Risk Management of Bank of Communications* and the *BoCom Implementation Rules for Anti-Money Laundering Management of Overseas Institutions*. Efforts have also been made to optimize the AML due diligence investigation mechanism, strengthen AML accountability

management across business lines, enhance digital and intelligent AML capabilities, and improve the end-to-end management of transaction monitoring and reporting. The Bank has reinforced Group-wide integrated management and developed supporting functions for the "four mechanisms" of the overseas AML system management.

2.4.3 Anti-Fraud

The Bank complies with the *Anti-Telecom and Online Fraud Law of the People's Republic of China* and the *Guiding Opinions on Promoting Targeted Governance of the "Fund Chain" in Telecom and Online Fraud*. We have established a "5×4+N" real-time anti-fraud framework, improved victim protection mechanisms, deepened police-bank cooperation, enhanced coordination mechanisms, and conducted anti-fraud awareness campaigns to protect customers' assets.

BoCom's anti-fraud initiatives

Improving victim protection mechanisms

- Refine victim protection models by analyzing characteristics of fraud cases to continuously enhance both the coverage and accuracy of early warning alerts.
- Establish tiered handling procedures for suspicious transactions based on risk levels, with differentiated processes for risk verification, customer outreach, and risk mitigation.
- Standardize procedures for verifying and handling large-value suspicious transactions involving potential victims, thus enhancing the Bank's capability to accurately identify and respond to telecom fraud.

Deepening police-bank collaboration

- Strengthen communication with police authorities to stay informed of the latest telecom fraud trends, and enhance business and technological prevention and control capabilities accordingly.
- Establish a rapid police-bank response mechanism, featuring both online and offline handling processes. High-risk transactions flagged by risk control models are automatically intercepted through online systems. Once a risk is confirmed, our branches coordinate with

local anti-fraud centers to conduct joint in-person interventions.

2.5 Anti-Unfair Competition

The Bank strictly adheres to relevant laws and regulations, including the *Law of the People's Republic of China Against Unfair Competition* and the *Anti-Monopoly Law of the People's Republic of China*. We are firmly committed to maintaining a fair and orderly competitive environment in the financial market. The Bank also provides training on anti-unfair competition policies in key business areas. As of the end of the reporting period, the Bank had not been involved in any litigation or administrative penalties due to unfair competition practices.

2.6 Due Diligence

In 2025, the Bank further advanced reforms to our AML system by establishing a responsibility list for the first-line AML functions, and completed centralized reviews of enhanced due diligence for customers assessed as having high or relatively high money laundering risks. Furthermore, ESG factors have been fully integrated into the entire credit management process, covering due diligence, credit approval, and post-loan (post-investment) monitoring. To be specific, due diligence serves as a key tool for managing customers' ESG risks. (For more information on due diligence in credit business, please refer to the "Green Finance" section.) In accordance with the *BoCom Supplier Management Measures*, the Bank conducts supplier eligibility reviews during onboarding to ensure that suppliers are not currently listed as dishonest judgment debtors, parties involved in major tax violations, entities with serious illegal and dishonest conduct in government procurement, or businesses included in the abnormal operations register. Additionally, the Bank has established outsourcing management measures for IT, security, corporate banking, personal banking, and operations, requiring strengthened supplier oversight. Business departments at both the Head Office and branches organized due diligence on suppliers, focusing on their technical capabilities and industry experience and ensuring that due diligence findings accurately reflect the suppliers' actual conditions.

2.7 Stakeholder Communication

The Bank released a total of 193 disclosures on the two stock exchanges, including 54

announcements related to the completion of the private placement. Additionally, 20 interim announcements on carbon reduction loans, related-party transactions, and capital-related matters were published on our official website to ensure timely and compliant information disclosure. The Bank received an "A" rating for information disclosure from the SSE for 12 years.

Stakeholder	Description	Primary Concern	Communication Channel	BoCom Response
Customers	Current and prospective customers	Convenient, efficient, and quality financial services	Product promotions, customer service hotlines, and online and offline activities, among others	Providing efficient, quality services, developing innovative financial products, and protecting customer information security
Shareholders	Holders of the Bank's shares	Strong investment returns; fair, impartial, transparent, and timely information disclosure	Shareholders' General Meetings, investor activities, hotlines, emails, faxes, and company announcements, among others	Maintaining stable operations and actively managing investor relations, among others
Government agencies	Governments at all levels, the PBOC and its branches, the National Financial Regulatory Administration (NFRA) and its local offices, the China Securities Regulatory Commission (CSRC), and other regulatory bodies	Ensuring financial system stability, driving national economic growth, and supporting public welfare, among others	Policy directives, work reports, and daily communications, among others	Strengthening compliance management, actively aligning with national strategies and macroeconomic policies, supporting the real economy, and promoting technology finance, green finance, inclusive finance, pension finance, and digital finance, among others

Employees	All personnel employed by the Bank, regardless of hiring arrangement or tenure	Stable employment, competitive benefits, a positive work environment, and growth opportunities, among others	Workers' congresses, opinion collection, staff surveys, and counseling sessions, among others	Enhancing employee satisfaction, safeguarding employee rights and interests, and promoting shared growth
Environment	The ecological environment in regions where the Bank operates and other areas impacted by our business activities	Addressing climate change and supporting low-carbon economic growth	Information disclosure, various activities, and pricing strategies, among others	Advancing green finance, digital banking, green office practices, sustainable procurement, and environmental campaigns, among others
Community	The public and institutions in regions where the Bank operates and other areas impacted by our business activities	Social harmony and enhanced well-being	Financial service initiatives and charitable activities, among others	Engaging in philanthropy, organizing volunteer initiatives, and promoting financial literacy, among others
Partners	Suppliers, industry peers, and other business partners of the Bank	Integrity, mutual benefit, fair procurement, and win-win cooperation	Bidding conferences, business exchanges, and collaborations, among others	Responsible procurement and business partnerships, among others
Social organizations	Industry associations (e.g., CBA) and non-profit organizations, such as	Industry development and social harmony concerns	Information disclosure and various activities	Accepting supervision and participating in industry initiatives, among others

	environmental and public welfare groups			
--	---	--	--	--

3 Economy

Embracing Sustainable Development Trends

In the context of building China into a financial powerhouse, the Bank supports high-quality development. By advancing technology finance, expanding inclusive finance, developing pension finance, and empowering digital transformation, the Bank strengthens financial support for national strategies and the real economy, contributing to higher-quality and more efficient economic growth.

Aligning with SDGs



Sustainable Development Issues

Supporting the real economy; Technology finance; Inclusive finance; Rural revitalization; Pension finance; Digital finance; Innovation-driven development

Our performance

The Bank recorded total assets of RMB 15,548.388 billion, total loans of RMB 9,123.571 billion, and total tax payments of RMB 28.270 billion. Additionally, the balance of inclusive loans to micro and small enterprises (MSEs) totaled RMB 908.435 billion, up 19.21%. The balance of agriculture-related loans reached RMB 833.373 billion, up 11.99%, while the balance of inclusive agriculture-related loans was RMB 110.990 billion, up 21.24%.

3.1 Supporting the Real Economy

The Bank plays a leading role in serving the real economy and continues to expand financing for major national strategies, key sectors, and underserved areas. As a major financial institution, we provide sustained financial support for economic development.

3.1.1 Governance

The Bank attaches great importance to promoting high-quality development of the real economy through financial services. The Head Office and branches, as well as front and middle offices, work in closer coordination, supported by strengthened institutional arrangements. Dedicated committees and task forces have been established for key areas of the real economy, such as technology finance. We have also made ongoing improvements to our four-tier organizational structure comprising the Head Office, branches, secondary branches, and sub-branches. This enables effective vertical integration across levels while also strengthening cross-functional synergies to improve the effectiveness of financial services.

3.1.2 Strategy

Supporting the real economy remains a key strategic priority for the Bank. We continue to strengthen policy support and institutional arrangements in the "Five Key Areas of Finance". We align credit policies with national priorities supporting manufacturing and technological innovation. Development targets for such key areas as technology finance and rural revitalization are incorporated into our internal performance assessment. We also increase resource allocations to these areas through measures such as preferential capital cost arrangements, further improving the effectiveness of financial services for the real economy.

3.1.3 Management of Impacts, Risks, and Opportunities

The Bank maintains a balanced approach to risk management, reinforcing robust and compliant operations while enhancing the ability to proactively identify and manage risks. We focus on preventing and mitigating risks in key areas and refining our risk response mechanisms. By safeguarding against systemic risks, the Bank plays a leading role in supporting the real economy and contributing to financial stability.

3.1.4 Indicators and Targets

As of the end of the reporting period, the Bank's balance of corporate loans to the real economy exceeded RMB 5.5 trillion, up 10.09%. The number of corporate lending clients

exceeded 25,000.

3.1.5 Advancing National Strategies

With a global perspective and integrated financial capabilities, the Bank has developed a cross-border financial service system, covering multiple markets and currencies, across the full transaction lifecycle. Through high-quality financial services, we support national development priorities.

Key Performance Highlights:

As of the end of the reporting period,

The total assets of our banking institutions outside the Chinese mainland reached RMB 1,250.986 billion, while the international settlement volume stood at USD 587.044 billion, up 14.55% year-on-year. The balance of cross-border trade financing was RMB 49.351 billion, up 85.58% from the beginning of the year.

3.1.5.1 Optimizing Overseas Presence

As of the end of the reporting period, outside the Chinese mainland, the Bank has established 24 banking institutions and operated 68 business outlets. We have maintained close cooperation with 666 head-office-level banks across 104 Belt and Road partner countries and regions. This extensive network covers major global financial centers on five continents.

3.1.5.2 Supporting Belt and Road Projects

The Bank actively supports major Belt and Road projects across key sectors such as telecommunications, mining, and green energy, including COSCO SHIPPING's Chancay Port project in Peru and CGN's Lagoinha Solar PV project in Brazil. Our network now extends to over 40 countries in the Asia Pacific, Africa, the Middle East, and Latin America, supporting the development of the Belt and Road Initiative.

Case: Supporting a Chinese company's power plant expansion project in Saudi Arabia

On July 30, 2025, the expansion project of the Ghazlan Power Plant was launched as a key energy project under the "Saudi Vision 2030". It is one of the largest EPC power plant expansion projects undertaken by Chinese companies in the country. Facing challenges such as tight

timelines for issuing guarantees and complex responsibility arrangements, BoCom leveraged our global presence to establish a coordination mechanism led by the Head Office, with collaboration across three locations. The Bank provided integrated cross-regional guarantee services and successfully issued approximately RMB 4.026 billion in performance guarantees to support project implementation. This greatly enhanced our impact in the energy infrastructure sector in the Middle East.

Case: Injecting new impetus into cross-border financial cooperation

In October 2025, our Xinjiang Branch, together with BOCOM International and the Horgos Innovation Unit, supported Kazakhstan's national oil and gas company KazMunayGas (KMG) in issuing a five-year offshore RMB bond worth RMB 1.25 billion. This issuance marked several milestones: KMG's debut in the offshore RMB market, Horgos Innovation Unit's first investment in an overseas issuer's bond, and the Group's first underwriting of a RMB bond for a Central Asian issuer. It also represented an important development of medium- and long-term RMB bonds in Central Asia, advanced cross-border business for the Horgos Innovation Unit, and contributed to financial cooperation under the Belt and Road Initiative.

3.1.5.3 Enhancing Cross-Border Financial Services

With a global perspective and a strong focus on innovation, the Bank continues to improve a comprehensive service system covering domestic, offshore and overseas markets. By further innovating financial products and expanding partnerships with financial institutions, the Bank is building a broader cross-border financial service ecosystem to provide robust support for high-level opening-up.

Innovative cross-border financial services

<p>Enhancing trade finance facilitation</p>	<ul style="list-style-type: none"> ● Leveraging the "five-in-one" cross-border account system, the Bank has streamlined account opening. Through a full financial license portfolio and Group-wide collaboration, the Bank provides comprehensive documentation services, cross-border trade finance across the entire transaction lifecycle, and integrated supply chain finance solutions. ● The Bank introduces offshore funding to provide cross-border financing solutions such as bilateral loans, overseas syndicated loans, and offshore
---	--

	direct loans, helping domestic and international enterprises improve financing efficiency and reduce costs.
Developing efficient digital services	<ul style="list-style-type: none"> ● "BOCOM Trade Link" was launched to create a one-stop cross-border financial service platform, integrating foreign exchange, financing, and information services. It promotes the digitalization of cross-border business and enhances service efficiency to support both domestic and international trade. ● The "E-commerce Connect" solution was upgraded. By connecting our open banking platform with major cross-border e-commerce platforms, we provide one-stop services including account opening, store management, and payment settlement, significantly enhancing cross-border payment efficiency and supporting new forms of foreign trade.
Upgrading integrated cross-border financial services	<ul style="list-style-type: none"> ● The Bank refined the "BOCOM BAYPAL" brand and launched five service packages for key scenarios in the Guangdong-Hong Kong-Macao Greater Bay Area (Greater Bay Area). By integrating cross-border payments, wealth management and financing services, the Bank provides seamless cross-border financial services for residents and businesses in the region.

Honors and Awards:

"BOCOM Trade Link" was named one of the "Cases of the Year 2025 for High-Quality Development in Shanghai" by CCTV Finance.

Case: Hainan Branch completed the first EF account investment in local government bonds in Hainan Free Trade Port

As one of the first pilot banks for EF accounts, our Hainan Branch continues to develop cross-border financial services. In September 2025, it completed the first investment in local government bonds via an EF account in the Hainan Free Trade Port (FTP). The transaction expanded the use of EF accounts in cross-border financial services and further strengthened the Branch's cross-border business in Hainan. As of the end of the reporting period, the Branch's EF business exceeded RMB 50 billion, among the highest levels for state-owned banks in the province.

Case: Guangdong Branch supported new quality productive forces through Belt and Road cooperation

On June 30, 2025, our Guangdong Branch, as one of the lead arrangers, structured a cross-border RMB syndicated loan for the Indonesian hydrometallurgical project of a major Guangdong-based state-owned enterprise. With a commitment of RMB 1.2 billion, the Bank ranked first among participating commercial banks. The project supports the construction of a hydrometallurgical facility in Indonesia with an annual output of 80,000 tonnes of nickel-equivalent nickel-cobalt intermediates. As a demonstration project for Guangdong's international industrial capacity cooperation, the transaction pioneers a new model of cross-border financing for the new energy vehicle supply chain in the Greater Bay Area, and helps enhance China's role in strategic metals such as nickel and cobalt.

3.1.5.4 Promoting the Internationalization of RMB

The Bank leverages a global network to integrate cross-border RMB business with the Group's development strategy and enhance cross-border RMB service capabilities. In 2025, the Bank's cross-border RMB business exceeded RMB 2.5 trillion for the first time, hitting a new record high.

Case: Tianjin Branch structured the first cross-border trade financing backed by rental receivables from domestic aircraft and vessels

In September 2025, our Tianjin Branch, in collaboration with major leasing companies, completed the country's first cross-border trade financing transaction backed by rental receivables from domestically manufactured aircraft and resource repatriation vessels, with a total value of RMB 200 million. With support from the Head Office, Tianjin Branch developed innovative financing solutions for the leasing industry, structuring tailored financing arrangements to meet medium- and long-term funding needs. The entire transaction chain was denominated in RMB and processed through FT accounts. By combining the strengths of free trade zone (FTZ) finance and trade finance, the Bank supported the overseas expansion of China's high-end equipment manufacturing sector and promoted RMB internationalization.

Case: Hong Kong Branch issued the world's first publicly offered Shanghai FTZ offshore bond

On August 1, 2025, our Hong Kong Branch successfully issued the world's first Shanghai FTZ offshore bond through a public offering. Carrying a coupon rate of 1.85%, this three-year bond received a facility rating of A2 from Moody's and A from Fitch. The bond is the world's first publicly offered Shanghai FTZ offshore bond, with both the issuer and investors offshore. It is also the first such bond cleared in the Lin-gang Special Area of China (Shanghai) Pilot Free Trade Zone, registered and held in custody within the FTZ, settled cross-border through FT accounts, and dually listed. This issuance made BoCom the only market participant currently equipped with all six core capabilities required for this type of business, further sharpening our edge in offshore finance. Also, it added to Shanghai's cross-border investment and financing product offering, supported the building of an offshore RMB asset hub, and strengthened Shanghai's role as an international financial center and the internationalization of the RMB.



Seoul Branch has facilitated ROK companies' investment and cooperation in China for three consecutive years, advancing RMB internationalization

3.1.6 Supporting Key Regions

The Bank continues to expand financial support for key regions. We actively promote the building of Shanghai's "Five Centers", contribute to high-quality growth of the Greater Bay Area, and accelerate institutional innovation and business expansion in pilot FTZs, so as to enable coordinated regional development through comprehensive financial services.

3.1.6.1 Supporting Shanghai's "Five Centers"

The Bank focuses on supporting the development of Shanghai's "Five Centers". Through product innovation, expanded service scenarios, and digital solutions, we continue to enhance service capabilities and contribute to building Shanghai into an international financial center and a global hub for scientific and technological innovation.

Strengthening financial market engagement	<ul style="list-style-type: none"> ● During the reporting period, the Bank recorded more than RMB 800 billion in "Bond Connect" transactions, actively supporting cross-border financial market connectivity.
Supporting major projects	<ul style="list-style-type: none"> ● During the reporting period, the Bank established partnerships with 76 municipal-level and 256 district-level major projects, providing financing support for key infrastructure developments, including the construction of a shipping hub.
Advancing technological innovation	<ul style="list-style-type: none"> ● With the Head Office-level technology finance center (Zhangjiang) as the core platform, the Bank jointly launched nine technology finance service stations with regional technology institutions. The Bank also co-founded the "BoCom Technological Innovation—Shanghai Joint Innovation Laboratory" with the Science and Technology Commission of Shanghai Municipality and the Shanghai Technology Innovation Center (STIC). ● The Bank conducted research on key industries such as AI, integrated circuits, aerospace, and biomedicine, and introduced an action plan for Shanghai's three leading industries, including integrated circuits.
Enhancing public service capabilities	<ul style="list-style-type: none"> ● The Bank enhanced financial services for public well-being by launching the "One-Code Payment" healthcare service of the National Healthcare Security Administration in Shanghai, expanding access to credit-based medical services. ● The Bank expanded the use of digital RMB by enabling hardware wallet payments across Shanghai's entire rail transit network, including subways and maglev trains. ● The Bank actively implemented national and Shanghai policies on the supervision of advance payments to elderly care services. As one of the first designated depository banks, we have opened dedicated custody accounts for over 90 elderly care institutions.

3.1.6.2 Supporting the Greater Bay Area

The Bank integrates financial services into key areas of development in the Greater Bay Area,

including infrastructure connectivity, industrial collaboration and innovation, and accessible livelihood services. Through innovative solutions and targeted capacity building, the Bank provides sustained financial support for high-quality development of the region.

Case: Upgrading integrated cross-border financial services across the Greater Bay Area

On October 15, 2025, at the 138th China Import and Export Fair, BoCom showcased the "BOCOM BAYPAL" service brand under the theme of "Connecting the World". The Bank also set up service counters at the venue to introduce the platform and the comprehensive financial services for Chinese companies going global and international businesses entering the Chinese market. "BOCOM BAYPAL" integrates key services such as cross-border payments, wealth management, and financing. Leveraging the Bank's global network and digital capabilities, the platform facilitates efficient capital flows across the Greater Bay Area. The Bank also provides tailored services to exhibitors, domestic and international buyers, and residents in the region, thus supporting the success of the fair and the high-quality development of the regional economy and foreign trade.

3.1.6.3 Implementing FTZ Enhancement Strategies

The Bank plays an active role in the development of FTZs and FTPs by strengthening their financial infrastructure and implementing financial innovation policies, thereby contributing to greater rule-based financial openness.

Case: Shanghai Branch among the first to upgrade FTE account functions in the Shanghai FTZ

On December 5, 2025, our Shanghai Branch successfully completed upgrades to FTE account functions for two pilot enterprises, becoming one of the first banks to implement the enhancement. The upgraded accounts significantly improve the convenience of cross-border fund use. Enterprises can transfer funds between FTZ accounts and overseas or offshore accounts simply by submitting payment and receipt instructions. This pilot project reflects the Branch's continued efforts to enhance financial services for FTZs, support the real economy, and facilitate rule-based opening-up in cross-border capital flow management.

Case: BoCom became the first bank to provide PvP settlement of cross-border FX transactions for overseas and FTZ investors

On October 27, 2025, BoCom, as the sole foreign currency settlement bank providing agency services, completed the first-ever payment-versus-payment (PvP) settlement of an RMB foreign exchange (FX) transaction on behalf of BoCom (Hong Kong). Leveraging a multi-account framework including FT and NRA accounts, BoCom provides secure and efficient cross-border FX clearing and settlement services for domestic and overseas institutions. This service covers eight major currencies and a wide range of transactions, including RMB FX transactions in the domestic market and FTZs, non-RMB foreign currency pairs, foreign currency repos, foreign currency interbank lending, and currency swaps. This PvP settlement service for overseas and FTZ investors further strengthens our established position in agency FX clearing and settlement, improves connectivity between offshore/FTZ funds and the domestic FX market, and supports more efficient cross-border FX transactions.

3.1.7 Accelerating Manufacturing Sector

The Bank focuses on key segments of the manufacturing sector, supporting manufacturers investing in cutting-edge technologies to accelerate their transformation. We continue to enhance financial services for the high-quality development of manufacturing, contributing to a modern industrial base.

Case: Guangdong Branch issued the first transition finance loan for inland river passenger vessels in Guangdong

On December 5, 2025, our Guangdong Branch extended the first transition finance loan for inland river passenger vessels in Guangdong Province. It also marked the first loan of this kind within BoCom. The Branch provided an RMB 82.54 million transition finance loan to Guangzhou Public Transport Group Liner Co., Ltd., with an initial disbursement of RMB 10.54 million. The loan proceeds will be used to construct three fully electric passenger vessels to align with technological advancements in shipbuilding and help the borrower upgrade its fleet and enhance operational capacity. This project demonstrates the Bank's commitment to providing financial support for the high-quality development of manufacturing.

Case: Anhui Branch supported the faster localization of aero-parts manufacturing

To meet the expansion and R&D funding needs of an Anhui-based aero-parts manufacturer, our Anhui Branch introduced a credit approach combining "technological assessment with scenario-based financing", establishing a full-lifecycle service model covering technology development, equipment upgrades and industrial chain collaboration. The Branch quickly extended a fixed asset loan of RMB 97 million to support the purchase of high-end equipment, including five-axis machining centers, and the construction of four intelligent production lines. The financing helps ensure sound progress of the borrower's blade and casing coating project and critical breakthroughs in key aero-engine components.

3.2 Technology Finance

The Bank is committed to building a comprehensive, multi-level and full-lifecycle financial service system for technology innovation, fueling the robust growth of numerous technology enterprises and increasingly enhancing the competitiveness of the technology industry.

3.2.1 Governance

The Bank has established a Technology Finance Committee responsible for formulating development plans and overseeing technology finance operations across the Bank. We have also put into place a coordinated framework that connects the Head Office, branches, and subsidiaries to strengthen collaboration. We also advance technology finance at the regional level through vertical and matrix-based collaboration mechanisms. Branches work closely with local science and industry authorities to provide specialized financial services in key sectors such as integrated circuits and biomedicine. By the end of the reporting period, all key branches had set up dedicated units for technology finance. We now have more than 100 dedicated technology sub-branches and sub-branches with a technology focus across the country.

3.2.2 Strategy

In our "14th Five-Year Plan", the Bank has identified technology finance as a strategic priority for building competitive strengths. To this end, we have formulated internal policies,

including the *Action Plan of BoCom for Technology Finance* and the *Actions of BoCom for Accelerating High-Quality Development of Technology Finance*. Guided by these policies, the Bank is strengthening organizational coordination, product innovation, and ecosystem building, while developing distinctive service solutions and supporting mechanisms to establish a financial service system aligned with China's strategy of strengthening national technological capabilities.

3.2.3 Management of Impacts, Risks, and Opportunities

The Bank actively develops technology finance by strengthening the digital management system, refining credit policies, enhancing incentive mechanisms and accountability exemptions, and providing tailored service solutions. These efforts continue to improve our ability to serve technology enterprises while maintaining a sound balance between risk control and business innovation.

Initiatives to advance technology finance

Digital management	The Bank has independently developed a specialized evaluation system for technology enterprises, designed to support the entire technology finance lifecycle from precise enterprise identification and marketing to credit process optimization, online product design, risk prevention and control, and customer services.
Credit policies	The Bank has developed a comprehensive policy framework centered on the <i>Credit Support Policy for Technology Finance</i> , complemented by specialized policy guidelines and approval mechanisms, to provide clear policy guidance on financial services in relevant industry segments.
Incentives and accountability exemptions	The Bank has incorporated technology finance performance indicators into the assessment system, optimized the risk provisioning scheme for loans to technology enterprises, and granted these enterprises additional support such as economic capital relief. A differentiated tolerance threshold for non-performing loans in the technology finance sector has been established, alongside due diligence exemption guidelines to encourage responsible risk-taking.
Well-focused industrial support	The Bank has issued the <i>Action Plan for BoCom to Promote High-Quality Development of Shanghai's Three Leading Industries (Including Integrated Circuits)</i> , focusing on key regions and industries to develop distinctive business capabilities.

3.2.4 Indicators and Targets

As of the end of the reporting period, the Bank had provided technology-related loans to

more than 70,000 enterprises, with a loan balance exceeding RMB 1.58 trillion. Loans to small and medium-sized enterprises (SMEs) that use specialized and sophisticated technologies to produce novel and unique products as well as to technology-based SMEs rose by 21.02% and 36.29% from the end of the previous year, respectively.

3.2.5 Enhancing Service Quality and Efficiency for Technology Enterprises

The Bank promotes a positive cycle between technology, industry, and finance. We have advanced development and innovation across ecosystem building, product development, research support and organizational capabilities. Through initiatives in technology finance service models, ecosystem development, mechanism optimization and product innovation, we continue to enhance our services for technology enterprises.

Initiatives to enhance service capabilities for technology enterprises

Service model	<ul style="list-style-type: none"> ● The Bank has developed an innovative "4+3" service model. The four product lines—"Tech Easy Loan", "Tech Easy Investment", "Tech Easy Financing" and "Tech Easy Leasing"—cover the full lifecycle of technology enterprises and address their financing needs.
Ecosystem development	<ul style="list-style-type: none"> ● The Bank has built three scenario-based ecosystems, namely, "Tech Easy Chain" for industrial chains, "Tech Easy Wisdom" for innovation communities, and "Tech Easy Park" for sci-tech parks. These platforms connect innovation, talent, and capital resources to strengthen Bank-enterprise collaboration and support the development of a technology finance ecosystem. ● In close cooperation with the Torch High Technology Industry Development Center ("Torch Center") under the Ministry of Industry and Information Technology, the Bank has launched the "Five Ones" campaign and held large-scale customer events in 28 provinces and cities. Through collaboration among government, banks, industrial parks and enterprises, the campaign strengthens coordinated support for technological innovation.
Lending mechanism	<ul style="list-style-type: none"> ● The Bank has established a forward-looking service system guided by industry research. With a focus on emerging strategic industries, we are promoting deeper integration between technological and industrial innovation, and shifting financial services from a reactive to a proactive approach. ● The Bank has developed a proprietary "1+N" evaluation model for technology enterprises. This model precisely profiles enterprises from five dimensions: human capital, research and innovation, industry standing, public recognition, and business performance. It supports targeted marketing, credit approval,

	online product design, and risk prevention and control, thereby expanding the coverage and accessibility of technology financial services.
Product innovation	<ul style="list-style-type: none"> ● Based on the lifecycle characteristics of technology enterprises, the Bank has launched the "Tech Easy Loan" product line and introduced a proactive lending model. ● The Bank has also developed a diversified technology finance service framework, offering integrated solutions across equity investment, lending, bond financing, leasing, and trust services. This approach aligns financial resources more closely with the needs of technology enterprises and improves their access to financing.

Case: BoCom among the first financial institutions to issue sci-tech innovation bonds

On May 13, 2025, BoCom became one of the first financial institutions to issue sci-tech innovation bonds. With a total issuance of RMB 20 billion, the bond is the first five-year sci-tech innovation bond issued by a bank in the market. The proceeds will be used to support sci-tech innovation through lending, bond investments and other financing channels. This will effectively support the investment in start-ups, small businesses, long-term projects and hardcore technologies in the bond market, helping foster new quality productive forces.

Case: "Sci-tech Innovator Loan" of Dalian Branch recognized as a provincial-level innovative application for two consecutive years

On September 17, 2025, the "Sci-tech Innovator Loan", an innovative product launched by our Dalian Branch, was recognized as an innovative application of Fintech innovation supervisory tools in Liaoning Province for two years in a row. As a standardized online product offering full-lifecycle services, it removes traditional collateral requirements and incorporates multiple indicators into credit assessment, including tax payments, sales revenue, government technology subsidies and talent qualifications. This effectively addresses the financing difficulties of technology-focused MSEs with limited fixed assets for collateral. By the end of the reporting period, this product had provided RMB 1.037 billion in credit facilities to over 237 technology enterprises, efficiently meeting the financing needs of technology MSEs and contributing to the development of regional technology industries.

3.3 Inclusive Finance

The Bank is committed to advancing inclusive finance and actively supporting financing coordination initiatives for SMEs. By expanding the reach, accessibility, and convenience of our services, we aim to direct financial resources where they are most needed to strengthen the underlying vitality and resilience of economic and social development.

3.3.1 Governance

The Bank maintains a governance structure for inclusive finance, led by the Inclusive Finance Development Committee and coordinated by the Inclusive Finance Committee. We have enhanced our inclusive finance operating model through end-to-end integration across the front, middle, and back offices, and embedded inclusive finance responsibilities across the entire workforce. Furthermore, we have formulated the *Special Action Plan of BoCom to Support and Stimulate Consumption* to continuously optimize the consumer environment.

Key Performance Highlights:

During the reporting period,

The Bank convened two meetings of the Inclusive Finance Committee.

3.3.2 Strategy

The Bank has elevated inclusive finance to a Bank-wide strategic priority. In our 14th Five-Year Plan, we identify inclusive finance as a central pillar to strengthen our competitive position. To advance this agenda, we implement dedicated credit quotas, assign greater weight to inclusive finance in our performance evaluation framework, establish due-diligence exemption mechanisms, provide preferential funding arrangements, and allocate additional resources to priority sectors.

3.3.3 Management of Impacts, Risks, and Opportunities

The Bank continues to enhance inclusive lending policies and supporting systems, strengthen centralized oversight of low-risk portfolios, and reinforce the institutional framework and documentation standards. We advance digital risk management by refining our online credit approval models, implementing differentiated entry criteria, and applying granular customer segmentation. We have also developed an intelligent post-lending management system to improve real-time risk monitoring and response. In addition, we continue to optimize risk classification and system controls to enhance the effectiveness and efficiency of non-performing loan resolution.

3.3.4 Indicators and Targets

As of the end of the reporting period, the balance of inclusive loans to SMEs reached RMB 908.435 billion, reflecting a 19.21% increase. The number of inclusive loan customers totaled

495,700, up 19.10% from the previous period. The balance of inclusive loans to corporate borrowers amounted to RMB 458.462 billion, an increase of 26.74%. The agriculture-related loans recorded a balance of RMB 833.373 billion after an 11.99% growth, while the balance of inclusive agriculture-related loans rose by 21.24% to RMB 110.99 billion.

3.3.5 Expanding the Reach of Inclusive Finance

The Bank continues to improve the quality and efficiency of inclusive finance services by expanding service access, adapting products to diverse customer scenarios, and lowering financing thresholds. Through these efforts, we enhance the reach, availability, and convenience of our services to ensure efficient, targeted support.

3.3.5.1 Improving the Branch Network

To improve operational efficiency and service quality, the Bank continues to optimize our branch network, expanding our presence in key regions and county-level markets. As of the end of the reporting period, we operated 2,821 licensed outlets across the Chinese mainland, covering all provincial-level administrative regions. In key regions, including the Yangtze River Delta, the Greater Bay Area, and the Beijing-Tianjin-Hebei region, our network covered all major cities across 12 provinces and municipalities directly under the central government. In addition, we established 324 outlets across 198 county-level jurisdictions, including county-level cities, counties, and autonomous counties.

Case: Beijing Branch expands community access to social security services

As one of the first pilot banks in the "Social Security-Bank Partnership" program, our Beijing Branch designated 12 outlets within its network as social security service outlets based on the distribution of local enterprises and residents, enabling insured individuals to access services within their local communities. Each outlet includes a dedicated social security service area, offering 55 high-frequency services across six categories, including document inquiry and printing, contribution registration and payment processing, and eligibility certification. The services are accessible through three channels: online processing, self-service kiosks, and counter services. In addition, the Branch rolled out a pension benefit eligibility certification function on "Smart Kiosks" across 120 outlets, extending services beyond traditional counters and into neighborhoods. Since their launch, our social security service outlets have provided over 35,000 consultations and handled nearly 54,000 transactions, placing the Bank fourth among nine participating banks in the

Beijing market. This program helps expand the 15-minute community service network, making social security services more accessible within local communities.

"BoCom Sanyuan Sub-branch is less than one kilometer from my home. I can stop by anytime to check my bank statements and contribution records, or update my personal information, and there is always staff to assist me. It couldn't be more convenient." — Resident of Shuguangli Community, Chaoyang District

3.3.5.2 Developing the Inclusive Finance Service Model

The Bank has developed a comprehensive, multi-layered service model for inclusive finance, built on digital products, targeted outreach, integrated services, and intelligent risk management.

Initiatives to innovate the inclusive financial service model

Digital products	<ul style="list-style-type: none"> ● In response to the diverse, fragmented, high-frequency, and time-sensitive financing needs of SMEs, we strengthened our digital lending capabilities and established two innovative service platforms: "BoCom Zhan Ye Tong" for personal business access and "BoCom Yi Nong Tong" for agricultural services. Through these platforms, we released two flagship online products "Zhan Ye e-Loan" and "Yi Nong e-Loan", adopting a dual-track approach that combines standardized products with scenario-based customized offerings. We also rolled out localized pilot programs tailored to regional characteristics.
Targeted outreach	<ul style="list-style-type: none"> ● By partnering with leading companies in priority sectors and leveraging the credit profiles and transaction data of anchor enterprises, we provided tailored financing solutions, including "Quick and Easy Pay" and "Distributor Quick Loan", to SMEs throughout the supply chain, thus supporting the development of industrial clusters. ● We introduced a proactive credit pre-approval model by integrating multi-level public data sources, including national, local, and industrial park data. Leveraging privacy-preserving computation technologies and sandbox environments, we enable precise customer profiling and automated pre-approval of credit lines at scale for SMEs. ● We launched a QR-enabled outreach campaign targeting priority SME segments to bridge the "last mile" in financial service access and establish a scalable, digital, and targeted customer acquisition model.
Integrated services	<ul style="list-style-type: none"> ● We enhanced our "Credit+" service model by offering an integrated suite of financial solutions, including lending, easy settlement, and cash management. This marks a transition from standalone lending toward more personalized

	<p>and diversified financial solutions for inclusive finance customers.</p> <ul style="list-style-type: none"> ● Guided by a customer-centric approach, we launched a dedicated inclusive finance version of our corporate mobile banking platform, offered free of charge and designed to be user-friendly, digitally enabled, and interoperable. This strengthens our digital inclusive finance ecosystem across lending, settlement, and cash management, enabling a more personalized customer experience.
Intelligent risk management	<ul style="list-style-type: none"> ● We built an intelligent risk management system tailored to inclusive finance. Drawing on extensive multi-dimensional data, we developed proprietary risk scoring models and strengthened an end-to-end, fully digitized risk management process covering pre-loan underwriting, fraud detection, real-time lifecycle monitoring, and post-loan oversight. ● Machine learning technologies were used to further support our end-to-end risk monitoring and early warning mechanisms, including predictive models for inclusive loan delinquency. ● We utilized OCR-based verification, RPA-enabled automated checks, and other technologies to detect fraudulent activities, including contract forgery and falsification of collateral documentation. ● Through big data analytics and AI-driven cash flow analysis, we strengthened our centralized post-loan monitoring model, reducing manual workload while sustaining a delinquency early-warning coverage rate above 80% for inclusive finance portfolios.

3.3.5.3 Supporting SMEs

The Bank integrates diverse financial resources to deliver coordinated solutions tailored to the financing needs of different SMEs, helping address key constraints in their access to finance.

Initiatives to support the development of SMEs

Innovative products	<ul style="list-style-type: none"> ● We launched a series of innovative financial products to enhance financing support for technology-driven enterprises. ● In response to the evolving needs of technology-oriented SMEs, we refined our "Tech Easy Loan" product suite and enhanced its features to support early-stage innovation and build a replicable model of strengthened linkages between technology, industry, and finance.
Strengthening "Bank-government-guarantee" synergy	<ul style="list-style-type: none"> ● We built a coordinated tripartite financing framework by deepening cooperation with local financing guarantee centers and integrating data from the PBOC's capital flow platform. Drawing on our digital capabilities, we implemented a

	streamlined end-to-end online process featuring automated credit assessment and self-service drawdown.
Dedicated support policies	<ul style="list-style-type: none"> ● Recognizing the unique financing patterns of cross-border e-commerce enterprises—characterized by short cycles, small amounts, frequent demands and urgent timelines—we established a tailored and structured policy framework to respond more effectively to their time-sensitive funding requirements.

Honors and Awards:

The *Integrated Technology Finance System of the Group* received Second Prize of the PBOC Fintech Development Award.

The case "Innovative Achievements in Comprehensive Services for Technology Enterprises" was recognized by the Ministry of Industry and Information Technology as an "Achievement in Digital Inclusive Finance Product and Service Innovation".

The "Proactive Credit" service was selected as a featured case at CCTV Finance's "2025 Annual Gala of Building a Financial Powerhouse".

Case: Zhejiang Branch executed the first data asset pledge financing transaction in Zhejiang Province

On June 30, 2025, our Zhejiang Branch completed the first data asset-backed financing transaction for the AI sector in Zhejiang Province, extending RMB 10 million in credit to Zhejiang Lianxin Technology Co., Ltd., a specialized and sophisticated enterprise (SSE). Working with Hangzhou Data Exchange and independent valuation institutions, Zhejiang Branch created a structured approach to assessing the value of data assets, designing collateral arrangements, and managing related risks. By enabling data assets to be used as financing collateral for the first time, it helped technology enterprises unlock funding and supported the continued growth of the regional digital economy.

3.3.5.4 Enhancing Wealth Management Services

The Bank responds proactively to market developments and continues to strengthen the wealth management business. We help clients grow their investment income through diversified product offerings. In response to trends in the equity and gold markets, we expanded our third-party product lineup to include floating fee rate funds, index funds, and physical precious metals, and launched "Tun Jin Bao", a physical gold accumulation plan designed for inclusive finance customers. We also broadened the reach of our wealth management services. Through targeted

asset growth programs and dedicated product and service solutions, we increased wealth management penetration among clients. At the same time, we advanced the digital and intelligent transformation of our wealth management platform by introducing AI-enabled product analytics and research tools. As of the end of the reporting period, our assets under management (AUM) totaled RMB 2.16 trillion, representing an 10% increase from the previous year-end.

Case: BOCOM Wealth innovates product ecosystem to build a trusted wealth management brand

On November 10, 2025, at the 8th China International Import Expo (CIIE), BOCOM Wealth introduced three distinct product series, each with integrated service solutions: "Liquidity+" for high-liquidity cash management, "Pension Wealth Management" for prudent, long-term retirement planning, and "Multi-Asset Select" for diversified asset strategies designed to navigate market cycles. Together, these products broaden our wealth management offerings, address the needs of diverse client segments, and enhance the overall client experience.

3.3.5.5 Supporting Everyday Needs

The Bank focuses on everyday livelihood needs and continues to broaden the range of financial products and services across key areas of daily life, serving local residents, overseas visitors to China, and new urban residents. By meeting daily consumption needs and supporting improved living standards, we help boost household spending and strengthen domestic demand.

Initiatives to enhance public well-being

Expanding innovative product offerings	<ul style="list-style-type: none"> ● We refined our "1+5" consumer lending framework, anchored by "Huimin Credit" as the flagship product, and expanded our portfolio with targeted offerings for specific customer segments and use cases, including "Jiaoxiang Loan", "JingCai Loan", "Employee Loan", "Homeowner Loan", and "Home Furnishing Loan". ● We established a "1+3+2N" business lending framework, introducing industry-focused lending products such as "Business District Loan" and "Supply Chain Loan", and launching featured programs including "Zhengda Breeding Loan" to expand coverage for breeding, planting and liquor merchant sectors. We additionally rolled out the "State Subsidy Loan", a dedicated product with precise credit evaluation based on national subsidy data, supporting supply-side efforts to stimulate domestic demand and consumption.
--	--

Expanding access across key areas	<ul style="list-style-type: none"> ● In healthcare, we introduced the "Access to Medical Care by Personal Credit Records" service, allowing patients to leverage personal credit and receive treatment before paying their medical bills, thereby easing short-term financial pressure. ● In education, we launched the "BoCom Smart Campus" solution for special education schools, offering integrated services from tuition collection to digital canteen management. ● In public services, we linked our branch network with the One-Stop Online Government Services platform through the "BOCOM Government Connect" program, enabling customers to conveniently access selected government services without requiring in-person visits. ● In consumption, we launched the "BoCom Benefit Loan" personal lending brand. We also introduced a cultural and tourism promotion campaign, alongside community-focused initiatives designed to improve everyday livelihoods. Measures were taken to enhance the accessibility of tax refunds for international visitors.
Serving diverse groups	<ul style="list-style-type: none"> ● To enhance payment convenience for overseas visitors to China, we expanded payment acceptance across key everyday scenarios, including dining, accommodation, transportation, travel, shopping, healthcare, and education, and increased merchant acceptance of international bank cards. ● For new urban residents, we worked with local talent service and financial regulatory authorities and drew on the strong talent pools of leading regional universities to provide dedicated financing solutions, including the "BoCom Talent Loan" for high-calibre professionals, while expanding access to government-backed start-up guarantee loans. ● We also developed a tailored "Cloud Interbank" fund management platform for disabled persons' federations at various administrative levels, enhancing the efficiency and transparency of funds dedicated to supporting persons with disabilities.

Case: Inner Mongolia Branch strengthened hospital supply chain liquidity through "Quick and Easy Pay"

In July 2025, our Inner Mongolia Branch introduced "Quick and Easy Pay", a supply chain finance solution designed to address delayed payments to suppliers delivering large volumes of medical supplies to a hospital in Chifeng. The solution provides accelerated receivables financing at competitive rates, easing liquidity pressures and helping stabilize the hospital's supply chain. In addition, the Branch delivered an integrated package, including settlement services and digital payment solutions, to streamline hospital operations. Through flexible financing arrangements and

advisory support, the Branch moved beyond traditional capital provision to serve as a solutions-oriented financial partner, contributing to the development of a broader healthcare and elderly care financing ecosystem.

Case: Beijing Branch supported "Star Community" affordable housing development in the capital

On April 30, 2025, our Beijing Branch structured financing for the "Star Community" project developed by Shouchuang Heyuan, supporting the expansion of affordable rental housing in the capital. With a total floor area of over 400,000 square meters, the project will deliver more than 6,500 rental units for new urban residents and young people. The Branch tailored a dedicated financing package, refinanced and upsized an existing syndicated facility, optimized repayment terms, and reduced borrowing costs, thereby alleviating the developer's funding pressure. Leveraging its Fintech strengths, the Branch has developed integrated digital finance solutions embedded within community ecosystems. These include smart community management platforms, direct rent payment systems integrated with housing provident fund platforms, and community-based personal financial ecosystems, effectively enhancing digital community governance.



Liaoning Branch launches the community-focused initiatives designed to improve everyday livelihoods with local governments, UnionPay, and merchants, building an integrated finance and retail ecosystem in key commercial districts to bring financial services closer to county-level consumers.

3.4 Rural Revitalization

The Bank focuses on addressing structural challenges in agriculture, rural communities, and farmers, directing financial resources to areas of greatest need. By enhancing access to and the convenience of financial services in rural regions, we provide sustained financial support for rural revitalization.

3.4.1 Governance

The Bank has established a Rural Revitalization Steering Group, jointly chaired by the Chairman and the President, and built a governance structure that integrates strategic decision-making, coordination, and execution. Through the Steering Group's office, we maintain a cross-departmental coordination mechanism to ensure effective collaboration. We introduce annual action plans for financial services supporting rural revitalization, supplemented by targeted service plans for new agricultural business entities, and policy measures promoting the high-quality development of county-level institutions. Together, these initiatives form a "1+N" policy framework to advance supply-side financial reform in rural areas. In 2025, we issued the *2025 Work Plan of BoCom for Targeted Assistance* and the *Performance Evaluation Plan for BoCom's Targeted Assistance in 2025* to assess the effectiveness of our targeted support programs.

Key Performance Highlights:

During the reporting period,
The Rural Revitalization Steering Group held 2 meetings.

3.4.2 Strategy

Rural revitalization has been a strategic priority across the Group. We focus on key areas and build differentiated capabilities, continuously innovating products and services to direct financial resources toward critical areas such as food security, agricultural technology, rural industries, and rural infrastructure, thereby supporting the national goal of building a strong agricultural sector.

3.4.3 Management of Impacts, Risks, and Opportunities

The Bank coordinates government, local, and internal resources, and leverages financial strengths to advance comprehensive rural revitalization. By partnering with the National Agricultural Credit Guarantee System, we have established a risk-sharing mechanism that strengthens the risk resilience of agriculture-related lending.

3.4.4 Indicators and Targets

As of the end of the reporting period, the balance of agriculture-related loans reached RMB 833.373 billion, representing a growth of 11.99%, while the balance of inclusive agriculture-related loans totaled RMB 110.99 billion, up 21.24%. We allocated RMB 26 million in non-repayable assistance funds to designated counties and RMB 454.7527 million in repayable assistance funds. In addition, we mobilized RMB 29.115 million in additional support funds (both repayable and non-repayable), purchased and facilitated the sale of agricultural products worth RMB 41.1456 million, and introduced 8 assistance projects or enterprises with an actual investment of RMB 174.30 million. We also provided training to 4,770 individuals in supported

counties.

3.4.5 Advancing Rural Revitalization

The Bank continues to enhance the quality and impact of rural financial services by expanding and strengthening product offerings. At the same time, we maintain targeted support programs in designated counties, providing comprehensive and multi-layered financial support for the modernization of agriculture and rural communities.

3.4.5.1 Financial Services for Rural Revitalization

Drawing on a full financial license portfolio, the Bank developed "BoCom Yi Nong Tong" as a dedicated rural revitalization service platform, providing diversified financial solutions to broaden access to finance in rural areas and support farmers, rural communities, and local industries.

Initiatives to support rural revitalization with financial services

Service enhancement	<ul style="list-style-type: none"> ● As for credit support, we introduced a dedicated four-part framework, covering specialized policy guidance, approval channels, product offerings, and resource allocation, thereby reinforcing financial services for agriculture, rural areas, and farmers. ● We focused on strategic priorities such as stable grain supply and agricultural production, core seed technology development, and high-standard farmland construction. By prioritizing key agricultural regions while deepening our engagement with leading agricultural operators, we enhanced credit support in these areas. ● We expanded our county-level network and advanced the "BOCOM On-Cloud" ecosystem. By integrating the mobile banking app with intelligent service facilities at local outlets, we broadened financial service access, improved operational efficiency, and enhanced coordination between online and offline channels across county-level outlets.
Product innovation	<ul style="list-style-type: none"> ● We refined the "Yi Nong e-Loan" product suite and introduced the "Yi Nong Quick Loan", a standardized online lending product. Through differentiated product design, we address the financing needs of modern agricultural operators. ● We advanced key lending programs such as "Crop Farming Easy Loan", "Livestock Farming Easy Loan", "Agricultural Trading Easy Loan", and "Rural Tourism Easy Loan", providing convenient and flexible financing solutions to agricultural operators and supporting the growth of distinctive rural industries.

- We also actively promoted the "rural revitalization" themed card to provide comprehensive financial services to individual customers in rural revitalization areas. As of the end of the reporting period, we had issued 5,676,200 rural revitalization-themed bank cards, a net increase of 1,254,700 from the end of the previous year.

Case: Guangxi Branch supported the revitalization of the Liubao tea industry

On May 22, 2025, our Guangxi Branch introduced an innovative "Finance + Cooperative" model to support the Liubao tea industry in Wuzhou. Under this model, we extended RMB 3.5 million in financing to upstream cooperatives and provided RMB 200 million in working capital financing to anchor enterprises within the supply chain. By leveraging interest subsidy policies for ethnic trade and specialty products, we helped reduce financing costs by more than RMB 2.6 million. From 2022 through the end of the reporting period, we provided cumulative financing of over RMB 100 million to 42 distributors through flexible instruments such as revolving credit facilities and loan renewals without principal repayment, effectively alleviating financing constraints across the Liubao tea supply chain.



Tea plantations in Liubao Town, Cangwu County, Wuzhou, Guangxi

Case: Shenzhen Branch launched the "Yueshi Cold Chain Loan" to lower supply chain operating costs

Our Shenzhen Branch advanced its integrated "Technology-Industry-Finance" model and, on March 14, 2025, launched the "Yueshi Cold Chain Loan" in partnership with Shenzhen Yueshi Supply Chain Management Co., Ltd., its strategic shareholders (the All-China Federation of Supply and Marketing Cooperatives and Guangdong Agribusiness Group Corporation) and enterprises across the upstream and downstream supply chain. The product marks the first fully online order financing solution in China to integrate big data analytics into agricultural cold chain financing. By leveraging big data capabilities and the credit strength of anchor enterprises, the

Branch addressed the financing constraints faced by SMEs with limited credit profiles, benefiting numerous cold chain merchants. This initiative provides sustained financial support for advancing agricultural modernization and rural revitalization.

Case: Zhejiang Branch facilitated Jinhua's first rural revitalization medium-term note

On July 9, 2025, our Zhejiang Branch facilitated the issuance of Jinhua's first rural revitalization medium-term note by Jinhua Jintou Group Co., Ltd., with a total size exceeding RMB 350 million and a tenor of three years. The coupon rate was the lowest nationwide among comparable AA+ rated bonds. Proceeds will primarily support the Jinhua ham value chain by expanding raw material procurement to boost farmers' incomes, upgrading agricultural markets and related infrastructure, and strengthening the integrated production and distribution network. These efforts aim to advance the development of a modern agricultural cluster and underpin the growth of the local specialty economy.



Jinhua ham production process

Case: Lianyungang Branch expanded rural financial access in Jiangsu

In March 2025, to improve access to financial services in rural communities where customers often face long travel distances, dispersed demand, and procedural hurdles, our Lianyungang Branch partnered with the Jiangsu Provincial Rural Revitalization Task Force based in Donghai County to set up a temporary service counter at the Zhangwan Township market. The counter featured dedicated areas for policy consultation, transaction services, and financial education. Using the local dialect, the Branch clarified agricultural support policies, promoted credit awareness and fraud prevention, and tailored financing solutions for farmers and small and micro business owners. Through these efforts, we extended financial services beyond the traditional branch setting and closer to rural communities.

Case: BOCOM Leasing closed the first SPV-structured new energy leasing project in Shanghai Lingang Special Area

In March 2025, BOCOM Leasing completed China's first distributed rooftop photovoltaic operating lease project structured through an SPV in the Shanghai Lingang Special Area. The lessee is a subsidiary of TCL Industries Holdings Co., Ltd., and the leased assets comprise rural household rooftop photovoltaic installations. The project is designed to support rural energy transition and has established a replicable model for broader implementation. The installations are located across 83 villages in Guangdong Province and benefit more than 100 rural households. Through a "Photovoltaic+ Finance" model, the project increases household income while advancing clean energy development in rural communities. As of the end of the reporting period, BOCOM Leasing had deployed over RMB 20 billion in the household photovoltaic sector, benefiting hundreds of thousands of rural households and contributing to sustainable rural revitalization.

3.4.5.2 Supporting Rural Revitalization Through Targeted Assistance

The Bank continues to implement national policy requirements on sustained post-poverty alleviation support, maintaining the overall stability of assistance policies, resources, and teams. We remain committed to providing designated assistance to Tianzhu County in Gansu Province, Litang County in Sichuan Province, and Hunyuan County in Shanxi Province, while preventing large-scale poverty relapse.

Initiatives of targeted assistance

<p>Industrial revitalization</p>	<ul style="list-style-type: none"> ● We carried out targeted projects to support local specialty industries, including edible fungi in Tianzhu County, astragalus in Hunyuan County, and Tibetan chickens in Litang County. These projects included building modern warehousing facilities, developing processed astragalus products, and upgrading Tibetan chicken breeding bases to improve productivity and increase product value. We also facilitated site visits by leading enterprises and supported local investment efforts. ● We further supported local producers by establishing a dedicated rural revitalization section on our "Pay for It" app and conducting ongoing promotional campaigns to increase online sales. We also promoted specialty agricultural products from supported areas at major trade exhibitions, including the China International Fair for Trade in Services in Beijing, the CIIE in Shanghai, the China Import and Export Fair in Guangzhou, and the China International Consumer Products Expo in Hainan to broaden their market access.
----------------------------------	---

Talent revitalization	<ul style="list-style-type: none"> ● We partnered with Tsinghua University, Zhejiang University, Beijing Normal University, and other institutions to deliver 13 online and in-person training programs, reaching 4,770 participants. We also introduced the "SSE Sci-Tech Innovation Classroom" to enhance science and technology education, provided structured training for final-year senior high school teachers in Hunyuan County, and delivered mental health counseling programs for primary and secondary school students in Tianzhu County. ● In Tianzhu County, Gansu Province, we implemented the North Urban Area School Construction Project to upgrade teaching facilities and equipment and established the "Xingyi" Scholarship and Bursary to support students from financially disadvantaged families. ● In Litang County, Sichuan Province, we supported the construction of the Kangnan Vocational Training Center to expand access to vocational skills training and equipped local primary and secondary schools with water purification systems and eye-care lighting to improve the learning environment.
Cultural revitalization	<ul style="list-style-type: none"> ● We organized educational study tours for students from financially disadvantaged families and launched community recognition programs such as "Most Beautiful Families" and "Family Tradition and Culture" through a points-based incentive system. We also conducted public awareness campaigns on anti-fraud, AML, and credit literacy to promote trust and cultural development.
Ecological revitalization	<ul style="list-style-type: none"> ● We provided RMB 88 million in financing for a photovoltaic energy project in Litang County in support of green development. In Chakouyi Village, Tianzhu County, we advanced initiatives to improve the rural living environment and overall village conditions.
Organizational revitalization	<ul style="list-style-type: none"> ● We organized thematic Party-building activities to jointly study the Party's guiding principles and strengthen Party organizational capacity between the Party branches at our local offices and village-level Party branches in designated support counties, thereby strengthening grassroots Party organizations in rural areas. ● We developed and launched a "Smart Village Affairs" platform to enhance the efficiency of village-level governance through digital tools.

Honors and Awards:

The case titled "Four-Pronged Approach to Boosting Innovative Consumption Assistance" was selected by People's Daily Online for its "2025 People's CSR Cases".

Our targeted assistance programs have been rated "Outstanding", the highest designation, in the central government's annual evaluation for seven consecutive years.



Ren Deqi, Party Secretary and Chairman of the Bank, visits Litang County, Sichuan Province.

3.5 Pension Finance

The Bank continues to strengthen pension finance capabilities by enhancing services for senior customers. Through stable, diversified, and sustainable financial solutions, we support the growth of the silver economy and help enhance pension security and social well-being.

3.5.1 Governance

The Bank has established a Pension Finance Committee, chaired by the President, with designated senior executives serving as Vice Chairs, to provide unified leadership over pension finance across the Bank. Relevant Head Office departments and subsidiaries coordinate within their respective mandates to advance pension finance. We also issued the *Guidelines of BoCom on Supporting the Development of China's Pension System and the High-Quality Growth of the Silver Economy* and the *Notice on Effectively Carrying out the Implementation Plan for the High-Quality Development of Pension Finance in the Banking and Insurance Industry*, establishing a clear institutional framework for pension finance.

3.5.2 Strategy

In strict accordance with the *Outline of the Development Plan of Bank of Communications Co., Ltd. for the 14th Five-Year Plan Period (2021-2025)*, we implement an integrated pension finance strategy centered on customers, products, and services to develop a comprehensive pension ecosystem. We also launched the *Action Plan of BoCom for Pension Finance (2024-2025)* to advance elderly care industry financing, pension fund services, retirement wealth management, consumption finance for senior customers, age-friendly service enhancements, and consumer rights protection.

3.5.3 Management of Impacts, Risks, and Opportunities

The Bank has implemented the *Pension Finance Service System Development Plan of BoCom*, setting out a vision to build a senior-friendly bank. Under the "BoCom Pension" brand, we established a business framework built around five pillars of excellence and reinforced a foundation anchored in five stability principles, advancing development across key areas including elderly care industry financing, pension fund services, retirement wealth management, consumption finance for senior customers, age-friendly service enhancements, and consumer rights protection.

3.5.4 Indicators and Targets

As of the end of the reporting period, the balance of loans to the elderly care industry totaled RMB 6.762 billion, up 49.12%. Pension assets under custody amounted to RMB 3.41 trillion.

3.5.5 Enhancing Pension Financial Services

The Bank is fully committed to enhancing the quality and efficiency of pension financial services to better meet the diverse and evolving needs of the public.

Initiatives in pension financial services

Strengthening credit support for the elderly care industry	<ul style="list-style-type: none"> ● In collaboration with the Ministry of Civil Affairs, we launched pilot programs in 11 cities to enhance the supply of pension-related financial services, promote policies supporting service consumption and pension-related re-lending, and strengthen our project pipeline and loan disbursement for the elderly care industry.
Facilitating the full roll-out of the pension system	<ul style="list-style-type: none"> ● We strengthened policy outreach, refined our service framework, and pursued balanced growth in both scale and quality while expanding service coverage.
Boosting consumption in elderly care services	<ul style="list-style-type: none"> ● Supported by interest subsidy policies for consumer loans, we expanded pre-approved credit offerings under the Huimin Credit Program for elderly customers. We enhanced credit card services for this customer segment and increased card issuance. By integrating internal pension disbursement data with external data sources, we streamlined the credit card approval process. We also partnered with UnionPay to explore a three-tier benefits system involving the Bank, UnionPay, and our branches.
Diversifying pension financial products	<ul style="list-style-type: none"> ● We developed 241 personal pension products and currently offer 382 age-friendly products, providing comprehensive product coverage to better meet the diverse investment needs of senior customers. ● We launched "Pension e-Loan", an innovative online financing product

	for pension institutions. By integrating data from civil affairs authorities and developing dedicated risk and credit assessment models, the product enables a fully digital process from loan application to approval and disbursement for various types of elderly care institutions, including non-profit and corporate ones.
Ensuring the security of pension funds	<ul style="list-style-type: none"> ● We strengthened oversight of prepaid funds collected by elderly care institutions, providing dedicated fund supervision services to safeguard the financial interests of senior customers. We also continued to enhance the quality and effectiveness of our custody services.

Case: Qingdao Branch launched the first pension finance model community

On October 27, 2025, in collaboration with local government partners, our Qingdao Branch launched a pension finance model community in Nandao Town, West Coast New Area. The project marks the Bank's first pension finance model community and the first community nationwide to integrate resident services through the social security card platform. We introduced an integrated pension finance service framework built around financial services, social security, and community resources. Working with local authorities, neighborhood offices, and healthcare providers, we developed a coordinated elderly care support network. As part of the initiative, ten outlets were upgraded to age-friendly standards, with tailored services for senior customers with mobility or cognitive impairments. The Branch also piloted a Smart TV-enabled pension finance service model to improve access to financial information and services within the community. These measures help improve financial accessibility and strengthen daily service support for senior residents.

Case: Shanghai Branch established a community learning center with Baoshan Senior University

As part of our ongoing efforts to promote age-friendly banking services, our Shanghai Branch partnered with Baoshan District Senior University and was officially designated as an affiliated community learning center on September 8, 2025. Through this collaboration, the Branch integrates financial services into senior education programs by hosting themed financial literacy workshops and community engagement activities. Senior customers attending classes can conveniently access services such as retirement wealth management and fraud prevention guidance. This initiative brings financial services closer to senior customers through their participation in learning activities.



A senior learning session at the senior university

Case: Partnering with Xuhui District on an advanced elderly care talent development program

On June 24, 2025, we partnered with the Xuhui District government to strengthen workforce development in the elderly care sector by launching the first advanced collaborative training program of its kind in Shanghai. Moving beyond traditional skills-based training, the curriculum covers emerging areas such as complex disease management, psychological support, smart technology applications, and retirement financial services. The first phase aims to train 100 senior care professionals with multidisciplinary expertise. The program not only enhances the sector's talent pool to improve service quality, but also cultivates high-caliber professionals to support the long-term development of the elderly care industry.



Inauguration ceremony of the Xuhui District Public Services Talent Training Center

3.6 Digital Finance

The Bank leverages technology to advance digital finance and continuously enhance online service capabilities, delivering more convenient, secure, and inclusive digital finance services to

corporate, retail, and priority customer segments. At the same time, we expand the application of digital RMB, broaden its use cases, and strengthen ecosystem collaboration to support deeper integration between the digital economy and the real economy.

3.6.1 Governance

The Bank has established governance bodies including the Leading Group for Digital Transformation, the Digital Finance Committee, and the Product Innovation Management Committee to strengthen decision-making and coordination across digital transformation, digital finance, and product innovation.

3.6.2 Strategy

The Bank remains committed to a long-term digital transformation strategy and accelerates digital enablement across the organization. We continuously update our digital finance and AI action plans to keep pace with evolving needs. With data and digital technologies at the core of our strategy, we drive innovative service applications, and enhance the adaptability and inclusiveness of digital financial products and services for major strategies, key areas and weak links.

3.6.3 Management of Impacts, Risks, and Opportunities

The Bank coordinates development and security, continuously consolidates the foundation of digital infrastructure, strengthens the group-wide integrated protection of cybersecurity and data security, improves the capacity for safe production support and disaster recovery, and firmly holds the bottom line of preventing systemic financial risks.

3.6.4 Indicators and Targets

During the reporting period, the Bank invested 12.204 billion yuan in financial technology, representing a year-on-year increase of 6.74%. As of the end of the reporting period, the outstanding loans to core industries of the digital economy amounted to 319.32 billion yuan, up 14.46% from the end of the previous year.

3.6.5 Supporting Key Sectors

The Bank continues to expand our "Digital+" product portfolio, launching a range of online offerings such as "Tech Easy Loan", "Business District Loan", and "Supply Chain Loan". Our data-driven proactive credit model has continued to scale up and broaden its coverage. Key products, including "BoCom Jiaoxintong", "Cloud Interbank", and "Treasury", have been continuously upgraded. In addition, we played an active role in developing the shipping and trade

digital infrastructure and launched the "BOCOM Trade Link" platform to enable one-stop online processing of foreign trade financial services, significantly improving service accessibility and efficiency.

3.6.6 Driving Efficiency Through Digital and Intelligent Transformation

The Bank remains customer-focused and committed to delivering inclusive, technology-enabled, and user-friendly services. By leveraging smart digital technologies, we continue to expand our presence across wealth management and lifestyle service ecosystems, creating greater value for our customers.

Streamlining business processes	<ul style="list-style-type: none"> ● By leveraging data and digital technologies, we have reengineered key processes under an integrated "one-stop" service model across areas such as credit approval and disbursement, inclusive micro-lending, and corporate account services. Through targeted marketing, unified product applications, online contract execution, and flexible account opening solutions, we have streamlined procedures, reduced documentation requirements, minimized customer visits, and lowered reliance on manual processing, thereby improving operational efficiency.
Enhancing intelligent service capabilities at outlets	<ul style="list-style-type: none"> ● We have introduced a remote video service platform supported by audio-visual technology and AI capabilities, integrating digital tools with human interaction to enhance the customer experience. The platform can be deployed across various smart devices in our outlets and configured to meet local business needs, providing customers with a comprehensive range of services through a single integrated platform. ● We introduced video-enabled smart kiosks to provide a more innovative, efficient, and customer-centric service experience. Through real-time video connectivity, we enable centralized specialist support across regions and extend financial services beyond the physical footprint of our outlets.

Key Performance Highlights:

As of the end of the reporting period, Registered users of our personal mobile banking app reached 185 million. Users of our WeChat Mini Program totaled 62.1984 million, up 27.78% year to date, while our WeChat service

account and WeCom platform had 23.1276 million and 12.1833 million users, up 10.98% and 24.51% year to date, respectively.

A total of 1,057 smart kiosks had been deployed in outlets.

Case: Dual app 10.0 upgrades enhance services for diverse user groups

On November 7, 2025, at the 8th CIIE, the Bank released version 10.0 of both BoCom's mobile banking app and "Pay for It 10.0" app. The mobile banking app 10.0 introduces the AI Xiaolu Assistant, a dedicated "Liquidity+" section, and enhanced cross-border services. It also includes a student-focused campus section and improved accessibility features for elderly and visually impaired users. The "Pay for It 10.0" enhances promotional features and expands installment payment options to accommodate diverse spending needs. Together, the two upgraded apps strengthen our digital capabilities, better serve different customer segments, and enhance our wealth management and lifestyle services.

3.6.7 Advancing Digital RMB Applications

As the only digital RMB operating institution headquartered in Shanghai, the Bank continues to play an expanding role in advancing the digital RMB. We have established a cross-border settlement hub in Shanghai and actively participated in its use across cross-border trade and financial settlement. Through these efforts, we promote digital finance innovation and support the internationalization of the RMB.

Case: First blockchain-based digital-RMB factoring transaction executed on a digital asset platform

On September 24, 2025, the Digital RMB International Operations Center officially commenced operations in Shanghai. Our Bank is closely involved in its development and operations, and executed the first live blockchain-based factoring transaction settled in digital RMB on a digital asset platform. This transaction represented an innovative application of digital RMB in Delivery versus Payment (DVP) settlement for on-chain digital assets, and demonstrated our capabilities in digital finance.

Case: Hunan Branch completed its first transaction via mBridge

On June 6, 2025, our Hunan Branch completed a RMB 3 million cross-border payment from Hong Kong to Hunan Bosheng Supply Chain Co., Ltd. through the Multi-CBDC Bridge ("mBridge"). The transaction featured near real-time settlement, end-to-end traceability, and zero transaction fees, providing import and export enterprises with a more efficient cross-border

payment channel. This marks the Branch's first transaction via the mBridge and an important step forward in the application of digital RMB in cross-border trade.

3.7 Innovation-Driven Development

The Bank remains committed to innovation-driven development, actively fosters new quality productive forces, and continuously improves our Fintech innovation management system to comprehensively enhance digital and intelligent capabilities, in a bid to support high-quality business development.

3.7.1 Improve the Innovation Governance Mechanism

The Bank continues to improve its innovation management system. The Product Innovation Management Committee was established in 2025 to comprehensively enhance bank-wide product innovation governance and strengthen risk prevention and control for new products and new businesses. The Bank has standardized the management of innovation laboratories and R&D cooperation, deepened industry-university-research collaboration, and systematically boosted R&D efficiency and achievement transformation. In 2025, the growth rate of cumulative authorized patents exceeded 30%.

Innovation-driven management mechanisms

Standardizing innovation lab governance	Guided by the <i>Management Measures of BoCom for Fintech Innovation Laboratories</i> , we strengthened the governance of our innovation labs by standardizing their establishment and operations. We streamlined key stages across the lab lifecycle, including project approval and commercialization, and concentrated resources to advance frontier technology research and enhance the commercialization and application of technological innovations.
Standardizing R&D cooperation models	Guided by the <i>Management Measures of BoCom for Cooperative and Innovative Procurement Methods</i> , we introduced collaborative R&D mechanisms with suppliers to strengthen foundational and frontier Fintech research and accelerate the commercialization and application of Fintech innovations.
Enhancing intellectual property rights protection	Guided by the <i>Measures of BoCom for Intellectual Property Management</i> , we standardized patent and software copyright application procedures and oversight, strengthened innovation commercialization and related incentive mechanisms, and further enhanced our intellectual property governance.

3.7.2 Advancing Innovation R&D and Application

The Bank fully leverages emerging technologies such as AI to strengthen proprietary innovation and systematic development of core technologies. We have built a large-scale heterogeneous computing cluster with over 1,000 cards and developed a suite of large language models with hundreds of billions of parameters. Adopting a Model-as-a-Service approach to deliver out-of-the-box model capabilities, the Bank deepens human-machine collaboration. It has deployed over 2,500 AI agent assistants in total, covering scenarios including precision marketing, risk control, business process reengineering and burden reduction for grassroots operations.

Honors and Awards:

The project titled *New Model and Ecosystem Development Project for Inclusive Finance Retail Business* won First Prize at the PBOC Fintech Development Award.

The *Five-in-One Integrated Financial Solution for FTZ Offshore Bonds* and the *Digital RMB Solution Supporting the Development of Shanghai as an International Financial Center* both won First Prize of the Shanghai Financial Innovation Award granted by the Shanghai Municipal People's Government.

The Bank was recognized by the China Academy of Information and Communications Technology (CAICT) with Level 5 certification for digital technology application capabilities under the Financial Digital Maturity Model (FDMM) assessment, which evaluates digital transformation capabilities based on business value.

4 Environment

Embracing Sustainable Development Trends

The Bank has embedded green and low-carbon principles into operations and developed a well-structured green finance system. By strengthening climate risk management, innovating green financial products, and pursuing low-carbon operations, we enhance environmental and social benefits, in the hope of leveraging financial power to drive green transformation and high-quality development of the economy and society.

Aligning with SDGs



Sustainable Development Issues

Response to climate change; Green finance; Pollutant discharge; Waste disposal; Ecosystem and biodiversity conservation; Environmental compliance management; Energy utilization; Utilization of water resources; Circular economy

Our performance

Under the PBOC's standards, our green loan balance reached RMB 950.825 billion, up RMB 117.946 billion or 14.16% year-on-year.

4.1 Response to Climate Change

The Bank actively responds to climate change and supports the national carbon peaking and carbon neutrality ("dual carbon") strategy. We have established a comprehensive climate risk governance framework to identify climate-related risks and opportunities. By incorporating climate risks into our comprehensive risk management framework, we have set phased targets for climate adaptation and mitigation to contribute to the development of a Beautiful China through concrete actions. Additionally, we are a supporter of the Task Force on Climate-Related Financial Disclosures (TCFD) and have joined the Partnership for Early Awareness of Sustainability-Disclosure Today (P4EAST) of the International Sustainability Standards Board (ISSB).

4.1.1 Governance

The Bank has established a multi-tiered governance structure with clearly defined roles and responsibilities to ensure effective functioning. The Board makes strategic decisions and provides overall guidance, supported by specialized committees that offer oversight in their respective areas and manage related governance processes. The Senior Management leads overall implementation

and resource coordination, while a dedicated department facilitates cross-departmental collaboration and policy execution, ensuring the effective delivery of strategic objectives.

Table: BoCom's governance structure for responding to climate change

<p>Board of Directors</p>	<p>As the highest governing body for the Bank's sustainability management, the Board integrates sustainability-related risks and opportunities into its decision-making process by regularly reviewing sustainability reports. Under the Board, the Risk Management and Related-Party Transactions Control Committee, in line with the Bank's overall strategy, reviews and revises the Bank's risk strategy, risk management policies, risk appetite, comprehensive risk management framework, and internal control processes (covering climate risk and the green and low-carbon transformation). The committee also oversees the management of climate and environmental risks and opportunities, supervises the implementation of climate and environmental risk reporting mechanisms, and ensures that climate risk factors are incorporated into the Bank's comprehensive risk management framework. Meanwhile, the Social Responsibility (Environmental, Social, and Governance) and Consumer Protection Committee oversees the Bank's green finance activities, reviewing the Bank's green finance strategies and objectives, and promoting sustainability principles such as resource conservation, low-carbon operations, and environmental responsibility across the Bank.</p>
<p>Senior Management</p>	<p>The Senior Management formulates development strategies and objectives, establishes internal management processes and procedures, defines departmental roles and responsibilities, and conducts internal control reviews and assessments. It regularly reports to the Board and its specialized committees on the progress of green finance initiatives and submits reports to regulatory authorities in a timely manner as per the reporting requirements. The Green Finance Development Committee is a permanent institute of deliberative coordination in business management at the Head Office. It deliberates on and coordinates major policies, systems, and key issues related to the Group's green finance development. The committee also promotes the establishment and continuous improvement of the Bank's "Four Mechanisms" (for green finance policy research and communication, innovation and development, resource allocation and support, and performance evaluation) and "Five Systems" (for green</p>

	finance corporate governance, risk management, data governance, talent development, and green operations and information disclosure) to enhance the Bank's green finance capabilities.
Provincial and directly-managed branches, banking institutions outside the Chinese mainland, and subsidiaries	The Group's provincial and directly-managed branches, banking institutions outside the Chinese mainland, and subsidiaries serve as the primary entities responsible for implementing relevant regulatory requirements and Head Office policies. Following the leadership structure and division of responsibilities established at the Head Office, the relevant departments at these institutions advance green finance and transition finance initiatives within their respective jurisdictions. In consideration of local conditions, these institutions develop tailored policies to support the development and innovation of green finance and transition businesses, refine environmental and social risk management requirements, and enhance their environmental and social performance.

The Bank incorporates ESG and sustainability topics into director induction and ongoing education programs and strengthens the expertise of entities or individuals responsible for climate governance. The Bank also aligns incentives with corporate governance and risk management by linking the compensation of the Senior Management to climate governance performance and individual assessment results.

4.1.2 Strategy

The Bank prioritizes the management of climate-related financial risks, embedding green principles across the Group's strategy and operations. Climate risks have been incorporated into our comprehensive risk management framework. By advancing green finance, we support China's "dual carbon" goals through high-quality development.

Guided by Xi Jinping Thought on Socialism with Chinese Characteristics for a New Era, the Bank aligns the strategy with China's "dual carbon" goals and their implementation roadmap. In line with our own priorities, we have defined clear objectives and key initiatives to advance green finance in support of these national goals. Our strategy includes 16 specific actions, such as optimizing the credit structure and facilitating the green and low-carbon transformation of the energy mix. In addition, we have established phased targets for 2025, 2030, and 2060.

4.1.2.1 Strategic Planning and Deployment

In the *Outline of the Development Plan of Bank of Communications Co., Ltd. for the 14th Five-Year Plan Period (2021-2025)*, we have positioned green development as a defining feature

of the Group's business operations. Green finance is embedded across our four core business areas to promote balanced development in terms of scale, quality, and overall performance. The *Risk Management Plan of Bank of Communications Co., Ltd. for the 14th Five-Year Plan Period (2021-2025)* requires climate and environmental risks to be incorporated into our comprehensive risk management framework. The Plan also calls for continuous assessment of the impact of climate and environmental risks on our operations and management. We should also develop a carbon emissions (or carbon footprint) measurement system, explore qualitative and quantitative methodologies for climate and environmental risk analysis, and progressively enhance risk disclosures. Additionally, efforts should be made to strengthen the underlying data infrastructure and establish a dedicated risk database.

The Bank has begun developing a transition plan for the asset portfolio. This includes detailed assessments of current emissions levels and primary emissions sources in carbon-intensive industries, analysis of industry-specific transition policies, decarbonization pathways, and associated transition risks. At the same time, the Bank is developing a framework for the portfolio transition to carbon neutrality, specifying a baseline year, phased targets, and implementation pathways. The thermal power sector has been prioritized for the development of quantitative decarbonization targets, with plans to gradually extend the approach to other carbon-intensive sectors, such as steel, building materials, non-ferrous metals, and shipping. In the short term, the Bank will focus on strengthening carbon accounting capabilities for investment and financing, and improving systems for measuring environmental benefits and carbon footprints. These efforts will support climate risk management and more effective portfolio steering. Over the medium to long term, the Bank will increase resource allocation to clean energy, energy efficiency, environmental protection, and low-carbon technologies. The proportion of green assets in our portfolio will be steadily increased to support the transition to carbon neutrality in investment and financing activities.

Additionally, the Bank has introduced a pricing mechanism linked to carbon footprint. Specifically, clients demonstrating strong emissions-reduction performance may benefit from preferential financing terms. This encourages enterprises to undertake low-carbon upgrades and energy-efficiency improvements and strengthens financial support for emissions reduction in the real economy. The internal carbon pricing mechanism of the Bank is still under study.

4.1.2.2 Identification and Analysis of Risks and Opportunities

Table: Analysis of climate-related risks and their financial impacts

Risk Category	Specific Risk	Time Frame	Current Financial Impact	Expected Financial Impact

Physical risks: Risks arising from the physical impacts of climate change, including extreme climate events, environmental incidents, sea-level rise, and ecosystem degradation.	Extreme climate events (e.g., severe heat waves, floods, blizzards, and droughts)	Short-term	Downward pressure on collateral values; increased client default rates; and rising demand for emergency liquidity	Expansion of exposures to potentially high-risk assets; pressure on the capital adequacy ratio (CAR); and increased provisioning requirements
	Environmental pollution (e.g., soil, air, water, and marine pollution, as well as environmental incidents)	Medium-term Long-term	Weakened repayment capacity among clients in affected areas and gradual declines in collateral valuations	Gradual pass-through of environmental liability insurance costs into financing costs and sustained downward pressure on asset quality
	Geographic changes caused by long-term climate shifts (e.g., rising sea levels, shifting monsoon patterns, and melting glaciers)	Medium-term Long-term	Increased concentration of credit risks in certain regions and heightened operational pressure on clients in related industries	Need for long-term portfolio adjustments and gradual buildup of potential systemic risk factors
	Destruction and scarcity of natural resources (e.g.,	Short-term	Increased cash flow pressure on regional	Potential impact on

	desertification of arable land and freshwater shortages)	Medium-term Long-term	clients and a rise in loan delinquency rates	regional financial stability and the need to consider establishing corresponding risk mitigation mechanisms
Transition risks: Risks arising from the transition to low-carbon development, requiring actions in policy, law, technology, and markets to adapt to long-term climate change	Laws and policies: Governments tighten restrictions on certain carbon-intensive industries, introducing carbon trading mechanisms to incentivize GHG emissions reductions, limiting the use of carbon-intensive or inefficient energy sources, strengthening environmental law enforcement, levying and raising environmental taxes, and promoting sustainable land-use policies.	Short-term Medium-term Long-term	Reduced debt-servicing capacity among clients in carbon-intensive industries and increased overall financing costs due to environmental compliance expenses	Transition pressure on credit portfolios and potential downward revaluation of certain asset classes such as "brown assets"
	Technologies: Breakthroughs in renewable energy,	Medium-term Long-term	Increased demand for financing to	Potential revaluation of certain existing

<p>productivity, and carbon storage technologies will drive the shift to low-carbon industries, phasing out high-emission technologies and production systems in a process of "creative destruction".</p>		<p>support technology upgrades in traditional industries, with elevated uncertainty</p>	<p>assets due to technological change, while financing for green technologies may emerge as a key growth area</p>
<p>Markets: As climate concerns gain urgency, market dynamics are shifting significantly. Consumers increasingly prefer low-carbon, eco-friendly products and services, while investors in stocks and bonds are moving toward green financial assets.</p>	<p>Short-term, Medium-term Long-term</p>	<p>Declining revenues for clients in carbon-intensive industries may weaken repayment capacity, while demand for green assets increases</p>	<p>Accelerated business transformation may be required, with innovation in green financial products becoming a key competitive advantage</p>

Notes:

1. "Short-term" refers to the next 1-3 years; "Medium-term" refers to the next 3-5 years; "Long-term" refers to the next 5-10 years.
2. "Current financial impact" primarily refers to the impact of climate-related risks and opportunities on the Bank's financial position, results of operations, and cash flows during the reporting period. "Expected financial impact" primarily refers to identified climate-related risks and opportunities that could result in material adjustments to the carrying amounts of assets and liabilities in the financial statements for the next annual reporting period, as well as expected changes in the financial position over the short, medium, and long term.

Climate-related risks are transmitted to the banking system through traditional risk channels, materially impacting the Bank's business model and value chain. The specific transmission pathways are as follows:

Table: Transmission pathways of climate risk impact on the Bank

Climate Risk Type	Traditional Risk Type	Potential Impact on Enterprises	Potential Impact on the Bank	Time Frame
Physical risk	Credit risk	Asset damage, operational disruptions, supply chain interruptions, and revenue losses	Declines in collateral value, higher borrower default rates, and increased credit losses	Medium-term Long-term
Transition risk		Rising carbon costs, high technology upgrade expenses, and declining demand for traditional products	Deteriorating debt-servicing capacity of clients in carbon-intensive industries, and rising non-performing loan ratios	Medium-term Long-term
Physical risk	Market risk	Damage to production facilities, inventory losses, and business interruptions	Increased volatility in portfolio valuations and potential losses in trading accounts	Medium-term Long-term
Transition risk		Disruptions to traditional business models and loss of market share	Declines in the valuation of carbon-intensive assets, and lower investment returns	Medium-term Long-term
Physical risk	Liquidity risk	Cash flow interruptions and increased demand for emergency funding	Accelerated deposit outflows, rising financing costs, and depletion of liquidity buffers	Medium-term Long-term
Transition risk		Significant investment needs for transition and pressure on operating cash flows	Reduced access to market financing and weaker liability stability	Medium-term Long-term
Physical risk	Operational risk	Damage to business premises, IT system outages, and threats to employee safety	Disruptions to business continuity, increased operational costs, and risk of regulatory penalties	Medium-term Long-term
Transition		Restructuring of business	Higher system upgrade	Medium-

risk		processes and increased demand for workforce upskilling	costs and increased probability of operational errors	term Long-term
Physical risk	Reputational risk	Scrutiny over environmental performance and strained community relations	Brand value impairment, client attrition, and higher financing costs	Short-term medium-term Long-term
Transition risk		Lagging progress in transition, and reputational exposure as a "carbon-intensive" entity	ESG rating downgrades, declining investor confidence, and loss of business opportunities	Short-term Medium-term Long-term

Note: "Short-term" refers to the next 1-3 years; "Medium-term" refers to the next 3-5 years; "Long-term" refers to the next 5-10 years.

Table: Climate-related opportunities and their impact on business model and value chain

Climate-Related Opportunity	Description of Opportunity Drivers	Impact on the Bank's Business Model and Value Chain	Affected Value Chain Stage	Time Frame	Financial Impact on the Bank
Carbon emissions trading	Participating in carbon markets to provide services such as carbon asset management and carbon trading advisory, helping clients reduce compliance costs and achieve emissions reduction	Expanding our carbon finance offerings, including carbon asset-backed financing and carbon trading settlement services; optimizing capital allocation to support the development of low-carbon	Downstream value chain, bank investment portfolio	Medium-term Long-term	Revenue growth driven by increased demand for products and services, as well as an increase in fee-based income from carbon trading and carbon asset management services

	targets	projects			
Purchase of green electricity certificates (GECs)	Purchasing GECs to meet the green electricity demand for our own operations and reduce Scope 2 emissions, while providing financial services related to green electricity trading	Enhancing our green operations; reducing our carbon footprint; supporting the development of financial products for green electricity trading (e.g., green electricity loans, GEC-backed financing) to support clients' low-carbon transition	Direct operations, downstream value chain	Short-term Medium-term	Reduced energy costs (e.g., through preferential green electricity tariffs); increased income from green electricity-related financial services; and enhanced brand image that may attract green investors
Participation in voluntary GHG reduction projects	Participating in voluntary GHG reduction projects (e.g., forestry carbon sinks and renewable energy) to obtain carbon credits that can be used to offset our own or our clients' carbon emissions	Expanding our carbon finance activities; exploring innovation in products such as emissions reduction project financing and carbon credit trading; and supporting the carbon sink economy	Downstream value chain, bank investment portfolio	Medium-term Long-term	Attraction of green capital through participation in emissions reduction projects and carbon credit trading, growth in assets under management, and enhanced brand value.

<p>Transition finance products and services</p>	<p>Developing transition finance products (e.g., Sustainability-Linked Loans (SLL) and transition bonds) tailored to the transition needs of carbon-intensive industries</p>	<p>Improving our client portfolio by supporting the transition of carbon-intensive clients; enhancing market competitiveness through financial product innovation; and helping manage transition risks and mitigate asset stranding</p>	<p>Downstream value chain, bank investment portfolio</p>	<p>Short-term Medium-term Long-term</p>	<p>Revenue growth driven by increased demand for products and services; higher income from transition-related service fees and interest; and reduced credit risk exposure</p>
<p>Renewable energy</p>	<p>Supporting renewable energy projects (e.g., wind power and photovoltaic power) through investment or financing, thereby reducing the carbon intensity of our investment and financing activities</p>	<p>Optimizing asset allocation to support the development of the renewable energy industry; facilitating clean energy and green transportation development through green loans, bonds, and other products; and promoting low-carbon industrial</p>	<p>Downstream value chain, bank investment portfolio</p>	<p>Short-term Medium-term Long-term</p>	<p>Increased income from renewable energy project financing interest and returns, reduced portfolio carbon intensity, and strengthened climate risk management</p>

		transformation			
--	--	----------------	--	--	--

Note: "Short-term" refers to the next 1-3 years; "Medium-term" refers to the next 3-5 years; "Long-term" refers to the next 5-10 years.

4.1.2.3 Climate Resilience Assessment

Transition Risk Stress Testing

The Bank applies the Energy Policy Simulator (EPS) model to develop four stress-testing scenarios that reflect China's policy context while remaining aligned with internationally recognized climate scenarios. Three scenarios—mild, moderate, and severe—are benchmarked against the Network for Greening the Financial System (NGFS) scenarios, including the 1.5°C, 2°C, and Current Policies scenarios. In addition, based on China's carbon peaking and carbon neutrality policies and the "1+N" implementation roadmap, the Bank has developed a "3060" scenario.

Table: Transition risk stress-testing scenarios

Scenario	Description
Mild	Based on the Current Policies scenario, assuming that only existing policies remain in place, resulting in high physical risks
Moderate	Based on the 2°C scenario, under which the stringency of climate policies increases, providing a 67% probability that global warming will be limited to below 2°C
Severe	Based on the 1.5°C scenario, under which stringent climate policies and technological innovation help limit the increase in global average temperature to within 1.5°C above pre-industrial levels
3060	A localized scenario designed in accordance with China's carbon peaking and carbon neutrality policies and the "1+N" implementation roadmap

Note: EPS was jointly developed by the National Center for Climate Change Strategy and International Cooperation (NCSC), the Energy Research Institute (ERI) of the National Development and Reform Commission, and Energy Innovation (EI), a US-based research institution. Built on official Chinese government data, EPS is a quantitative analysis tool based on system dynamics, used to simulate and assess the impacts of energy and climate policies on energy consumption, GHG emissions, pollutant discharge, investment demand, and related macroeconomic and social indicators.

In 2025, the Bank applied a bottom-up testing approach to the thermal power industry. Under

this approach, baseline operating and emissions data were collected for individual clients. Based on four climate scenarios, we projected key indicators such as product output and fixed asset investment over the testing horizon. These projections were translated into impacts on clients' financial metrics, allowing us to assess corporate financial performance under different scenarios. Using internal rating models, we then calculated the probability of default (PD) for each client. The results were subsequently mapped into implied non-performing loan (NPL) ratios and further translated into impacts on the Bank's CAR. The results indicate that under all four stress scenarios, credit ratings of thermal power clients experienced moderate downgrades, and PD levels increased. However, after recognizing the required provisions for loan losses, the Bank's CAR remained stable, suggesting that overall risks are manageable.

Physical Risk Stress Testing

The Bank utilizes historical meteorological observation data, together with multi-model climate projections from the Coupled Model Intercomparison Project Phase 6 (CMIP6) used by the Intergovernmental Panel on Climate Change (IPCC), to generate spatial distributions and temporal evolution patterns of various climate hazard indicators. For acute climate hazards commonly observed in China, including typhoons, floods, and droughts, we have developed loss curve differentiated by geographic region and by exposure type. We quantitatively assess the potential impacts of future climate hazards on asset quality across terminal regions and industries. Within the IPCC framework, we combine Shared Socioeconomic Pathways (SSP) and Representative Concentration Pathways (RCP) to develop three stress scenarios—mild, moderate, and severe—to comprehensively assess the potential impacts of future climate change.

Table: Physical risk stress-testing scenarios

Scenario	Description
Mild	SSP1-2.6 (SSP126) low-emission scenario, which combines the SSP1 (Sustainability) socioeconomic pathway with the RCP2.6 strong emissions reduction pathway.
Moderate	SSP2-4.5 (SSP245) medium-emission scenario, which combines the SSP2 (Middle of the Road) socioeconomic pathway with the RCP4.5 intermediate stabilization climate pathway.
Severe	SSP5-8.5 (SSP585) high-emission scenario, which combines the SSP5 (Fossil-fueled Development) socioeconomic pathway with the RCP8.5 very-high-emission pathway.

In 2025, the Bank selected three natural disasters—typhoons, floods, and droughts—as the hazard types for acute physical risk stress testing. Agricultural clients and real-estate collateral were used as the primary exposures in the stress tests. This formed the basis for constructing the hazard scenarios and exposure portfolios used in the stress test. Furthermore, we have innovatively conducted research on the impact of climate creep on clients in the wind power

generation industry.

Hazard Type	Exposure
Droughts, floods, typhoons	Agricultural clients
Floods, typhoons	Real-estate collateral
Chronic climate changes	Wind power clients

Agriculture: Stress-testing results indicate that under the impact of floods, typhoons, and droughts, the PD for our agricultural clients increased by varying degrees across all three scenarios. However, due to the relatively small proportion of agricultural lending in our overall portfolio, the impact on CAR remained very limited. Among the three hazard types, droughts led to the largest increase in PD for agricultural clients, followed by floods, while typhoons had the weakest impact.

Real-estate collateral: Stress-testing results show that under the impacts of floods and typhoons, the overall loan-to-value (LTV) ratio for real-estate collateral backing the Bank's residential mortgage portfolio increased slightly across the three scenarios. Compared to typhoons, floods are expected to cause more significant value impairment of real-estate collateral.

Case study of the wind power industry: The Bank conducted a stress-testing case study on a client in the wind power sector, focusing on the potential impacts of global wind stalling. Based on the wind speed probability distribution and wind turbine power curves, the average daily wind power output for this client was projected over different future time horizons under the three scenarios. These projections were translated into impacts on the client's financial metrics, and subsequently, the PD was estimated using our internal rating models. Stress-testing results indicate that under all three scenarios, the client's PD increased.

4.1.3 Management of Impacts, Risks, and Opportunities

The Bank is committed to fully integrating climate-related impacts, risks, and opportunities into the risk management system. This involves systematically identifying, assessing, prioritizing, monitoring, and managing ESG risks, and ensuring these considerations are embedded in the strategy implementation, major decision-making, and risk control processes.

Three lines of defense for climate risk management

- **First line of defense: Front-office business function**

It is responsible for identifying and assessing climate-related risks associated with green finance products and services. It ensures that business activities comply with climate risk management policies and support sustainable development.

- **Second line of defense: Risk management function**

It is responsible for regulating, overseeing, and guiding climate risk management activities across the first line. It establishes policies, procedures, and standards for climate risk management,

incorporates climate risk indicators into the Group's risk appetite framework, and guides subsidiaries in integrating climate risks into their own appetite systems. It also regularly monitors, assesses, and reports on climate risk developments across business units, and coordinates efforts to balance pollution control, carbon reduction, and financial stability.

● **Third line of defense: Internal audit function**

It operates independently from the first two lines. It is responsible for reviewing and evaluating the governance, effectiveness, and oversight mechanisms of climate risk management, ensuring that risk management processes are effectively implemented and continuously improved.

Table: Identification and assessment process of climate-related risks and opportunities

Risk/Opportunity Category		Identification Method	Assessment Method	Prioritization Criteria
Risks	Acute physical risk	Identified by monitoring extreme weather alerts and based on the geographic location of assets	Stress testing	Establishing asset value impact thresholds and prioritizing risks exceeding those thresholds
	Chronic physical risk	Identified through long-term climate data analysis and regional climate scenario analysis	Stress testing	Ranking risks by potential long-term financial impact and prioritizing material threats
	Transition risk	Identified by monitoring climate policies, technological developments, and market preferences	Stress testing	Ranking risks by exposure level and transition urgency; prioritizing risks with significant potential impact
Opportunities	Energy source	Identified by analyzing policy incentives and	Assessment of potential benefits	Establishing financial impact thresholds and prioritizing opportunities

		market demand		exceeding those thresholds
	Carbon finance market	Identified by monitoring market developments and client demand	Market potential assessment	Ranking opportunities by market maturity and expected return and prioritizing key areas
	Green financial services	Identified by analyzing policy direction and market demand	Business potential assessment	Ranking opportunities by business growth potential and asset quality and prioritizing areas of competitive strength
	Operational efficiency improvements	Identified by recognizing opportunities for energy conservation and consumption reduction	Assessment of potential benefits	Ranking initiatives by return on investment and emissions reduction potential and prioritizing high-impact projects
	Brand value enhancement	Identified by assessing market recognition and brand value	Assessment of value creation potential	Ranking initiatives by value contribution and implementation complexity and prioritizing strategic projects

4.1.4 Indicators and Targets

4.1.4.1 Performance of Investment and Financing Activities

The Bank has issued the *Management Measures of BoCom for Carbon Emissions of Investment and Financing Clients*, which define the governance structure and roles and responsibilities for managing client carbon emissions. Drawing on both domestic and international standards, the Measures standardize the workflow, estimation methodologies, and applications of emissions measurement for investment and financing clients. Based on the reliability of data sources, the Bank applies a tiered classification approach to emissions measurement results,

providing high-quality data to support climate scenario analysis, stress testing, the Group's green transition, and climate-related disclosures.

The Bank has also established a carbon accounting system for investment and financing clients to enhance the digitalization of emissions measurement. The system incorporates industry-specific templates and features built-in cross-validation mechanisms for data quality. It can automatically generate emissions estimates using multiple methodologies, effectively strengthening the Group's carbon data infrastructure.

Drawing on domestic and international standards and peer practices, the Bank has been measuring the carbon emissions of investment and financing clients in carbon-intensive industries since 2021. During the reporting period, the Bank completed the fourth round of emissions measurement.

Table: Key performance indicators for carbon accounting and low-carbon transition in investment and financing activities

Key Indicator	Performance	Core Progress
Carbon accounting coverage	Retail assets such as residential mortgages and auto loans were included in the measurement scope for the first time. The balance of covered loans to investment and financing clients accounted for about 20.8% of the total loan balances on a Group basis.	Coverage expanded by 16.76 percentage points compared with the previous round of measurement.
Total carbon emissions and carbon intensity of investment and financing activities	On a comparable basis, carbon emissions attributable to the Bank's investment and financing activities in eight carbon-intensive industries decreased by 7.14% compared with the previous round. Carbon emissions intensity per RMB 10,000 of lending declined by 11.04%.	Both attributable carbon emissions and emissions intensity showed a downward trend, indicating initial progress in decarbonization.
Carbon intensity of assets in the thermal power industry	The carbon emissions intensity per unit of electricity generated by clients in the thermal power industry declined by 0.02 tCO ₂ /MWh compared with the previous measurement round.	Energy efficiency of the Bank's thermal power clients improved. Progress has been made in their clean transition. The measured carbon intensity is now below

		the benchmark level published by the IEA.
--	--	---

4.1.4.2 Performance of Operational Activities

The Bank places great emphasis on reducing emissions from our own operations. To this end, we continue to expand green services and explore ways to provide corporate and retail clients with greener, more efficient, and more convenient financial services. Through these concrete actions, we aim to promote green development across the economy and society.

In line with China's "dual carbon" goals, the Bank is steadily advancing carbon neutrality in business activities. Measures include comprehensive carbon accounting, technological innovation, and equipment upgrades. We are also implementing low- and zero-carbon transformation projects at key outlets in phases to reduce energy consumption at the source. In 2025, our GHG emissions were kept within 500,000 tCO₂e.

Indicator	Total	Per Capita (based on 133,137 employees)
GHG emissions of the Group	Scope 1 GHG emissions: 18,775.26 tCO ₂ e Scope 2 GHG emissions: 467,086.10 tCO ₂ e 2,082.89CO ₂ e Scope 3 GHG emissions: 2,082.89 tCO ₂ e Total emissions: 487,944.25 tCO ₂ e	3.66 tCO ₂ e per person

Note: The group had 133,137 energy-consuming employees in 2025 (including dispatched employees). The scope of Scope 3 statistics includes office paper, office waste, and kitchen waste.

Table: Environmental benefits of green services of the Bank

Customer Category	Customer/Transaction Scale	Annual Growth	Environmental Benefits (Equivalent)		
			Trees Planted	CO ₂ Emissions Reduced	Paper Saved
Corporate online banking (including mobile banking)	1.6804 million customers	7.57%	612,000	8,589.3 tonnes	34,698.9 tonnes
Personal online banking	11.44 billion transactions	11.32%	2,094,700	29,391.75 tonnes	118,295.32 tonnes

(including mobile banking)					
----------------------------	--	--	--	--	--

Note: Calculations are based on the average paper consumption per corporate online banking account and per personal online banking transaction.

4.1.5 Carbon Emissions Measurement Method

Method for measuring carbon emissions from corporate investment and financing clients

Based on available carbon emissions data from key clients, one or more of the following methods are adopted—either individually or in combination for cross-verification—to measure the carbon emissions of each key client:

The first is externally verified corporate reporting. This method uses carbon emissions disclosed in corporate reports (or self-reported data) that have been verified by an independent third party.

The second is unverified corporate reporting. This method uses carbon emissions disclosed in corporate reports (or self-reported data) that have not been verified by an independent third party.

The third is consumption-based estimation. This method estimates carbon emissions by applying relevant industry emission factors to a client's energy consumption data. The formulas are as follows:

Carbon Emissions = Carbon Emissions from Fuel Combustion + Carbon Emissions from Industrial Processes + Carbon Emissions from Net Purchased Electricity and Heat

Carbon Emissions from Fuel Combustion = Σ (Consumption of Fuel i \times Carbon Emission Factor per Unit of Fuel i) = Total Standard Coal Equivalent from Fuel Consumption \times Carbon Emission Factor per Unit of Standard Coal

Carbon Emissions from Industrial Processes = Σ (Output of Product i \times Industrial Process Carbon Emission Factor per Unit of Product i)

Carbon Emissions from Net Purchased Electricity and Heat = Net Purchased Electricity \times Regional Carbon Emission Factor per Unit of Electricity + Net Purchased Heat \times Carbon Emission Factor per Unit of Heat

This method is applicable to industries with high energy consumption and well-established production data, such as power, steel, and transportation.

The fourth is output-based estimation. It estimates carbon emissions by multiplying a client's

production output (or activity data) by relevant industry emission factors. The formula is as follows:

$$\text{Carbon Emissions} = \Sigma (\text{Output of Product } i \times \text{Carbon Emission Factor per Unit of Product } i)$$

This method is applicable to industries with well-established carbon intensity benchmarks per unit of output, such as power generation, steel, cement, flat glass, non-ferrous metal smelting, and paper.

The fifth is economic factor-based estimation. It estimates carbon emissions using a client's financial data (assets or revenue) in combination with industry-specific emission factors. The formulas are as follows:

Revenue-based estimation

$$\text{Carbon Emissions} = \Sigma (\text{Revenue of Client } i \times \text{Carbon Emission Factor per Unit of Revenue for the Industry of Client } i)$$

This method is particularly useful for industries with diverse inputs and products and complex production processes—such as petrochemicals and chemicals—where revenue serves as a practical proxy for emissions.

Asset-based estimation

$$\text{Carbon Emissions} = \Sigma (\text{Total Assets of Client } i \times \text{Carbon Emission Factor per Unit of Assets for the Industry of Client } i)$$

This method is particularly useful for industries with diverse inputs and products and complex production processes, where revenue-based emission factors are unavailable but asset-based factors are available.

Method for attributing financed carbon emissions to the Bank

In line with the *Technical Guidelines on Carbon Accounting for Financial Institutions (Trial)* issued by the PBOC, and based on emissions estimates for clients in key sectors, the Bank attributes a share of client emissions to our financing activities, reflecting emissions associated with our financial support. We also calculate our average asset carbon intensity, defined as the carbon emissions equivalent per unit of financing provided. The formulas are as follows:

$$\text{Attribution Factor for Enterprise } i = \text{Loan Balance of the Bank to Enterprise } i \text{ at the End of the Reporting Period} / \text{Total Assets of Enterprise } i \text{ at the End of the Reporting Period}$$

$$\text{Total Financed Carbon Emissions} = \Sigma (\text{Attribution Factor for Enterprise } i \times \text{Carbon Emissions of Enterprise } i \text{ During the Reporting Period})$$

Average Asset Carbon Intensity of the Bank's Covered Industries at the End of the Reporting Period = Total Financed Carbon Emissions at the End of the Reporting Period / Σ Loan Balance of the Bank to Enterprise i at the End of the Reporting Period

Data quality assessment of carbon emissions from corporate loans

As part of the Bank's emissions measurement for financed clients, the quality of each client's emissions data is assessed with reference to domestic and international standards and in accordance with the Bank's internal methodology. An overall data quality score is then calculated for each industry using a loan-balance-weighted approach. Detailed scoring criteria are provided in the table below.

Table: Scoring criteria for carbon emissions data quality

Data Quality	Score	Carbon Emissions Measurement Method	Description
High	1	Level 1: Verified reported carbon emissions	Using third-party verified carbon emissions data
	2	Level 2: Unverified reported carbon emissions	Using client-reported emissions data without third-party verification
Medium	2	Level 3: Carbon emissions based on physical activities	Estimated using the client's energy consumption data and corresponding emission factors
	3		Estimated using the client's production output data and corresponding emission factors
	4	Level 4: Carbon emissions based on company-level economic activities	Estimated using the client's revenue data and industry-specific emission factors per unit of revenue
5	Estimated using the client's asset data and industry-specific emission factors per unit of assets		
Low			

Method for measuring financed carbon emissions from personal lending

The Bank measures carbon emissions associated with personal lending activities with reference to relevant domestic and international standards. The scope covers key retail lending products, including residential mortgages and auto loans. Emissions generated by borrowers' underlying activities are attributed to the Bank's financing portfolio using an attribution factor

approach, based on the share of financing provided.

4.2 Green Finance

4.2.1 Governance

The Board of Directors ("Board") serves as the Bank's highest decision-making body for green finance. It is responsible for formulating our green finance development strategy and objectives and embedding environmental considerations into our business operations.

BoCom's green finance governance structure

<ul style="list-style-type: none">● Highest decision-making body<p>The Board establishes and promotes green principles across the Bank, such as resource efficiency, low-carbon operations, environmental protection, and sustainable development. The Board also reviews and approves green finance strategies and key policies formulated by the Senior Management.</p><p>The Board has established a Social Responsibility (Environmental, Social, and Governance) and Consumer Protection Committee, which oversees green finance initiatives.</p>● Management bodies at the Head Office<p>BoCom Green Finance Development Committee<p>Chaired by the President, the committee comprises five task forces: the Investment Policy and Structural Adjustment Task Force, the "Dual Carbon" Task Force, the Corporate Business Task Force, the Retail Business Task Force, and the Resource Support Task Force.</p><p>BoCom Green Finance Development Committee Office<p>A dedicated department is appointed to assume the responsibilities, coordinating efforts among committee members to advance green finance.</p></p></p>● Implementing bodies at branch level<p>Provincial and directly-managed branches, as well as branches and subsidiaries outside the Chinese mainland, establish their respective green finance development committees or steering groups. These bodies are responsible for planning, advancing, and evaluating green finance initiatives in support of "dual carbon" goals.</p><p>As of the end of the reporting period, over 30 branches had established specialized green finance departments, task forces, or flexible teams, and all 38 branches had designated full-time green finance officers.</p>

The Bank has established a "2+N" policy framework for green finance. The "2" refers to two overarching policy documents: the *Green Finance Policy of Bank of Communications Co., Ltd.* and the *Action Plan of BoCom for Carbon Peaking and Carbon Neutrality Goals*. These documents provide strategic guidance for advancing high-quality green finance development and

supporting China's "dual carbon" strategy. The "N" represents a series of specialized green finance policies, covering organizational structure, business management, supporting instruments, action plans, sector-specific guidelines, product integration, approval standards, and performance evaluation mechanisms. For example, the *BoCom Green Credit Implementation Measures* strengthen ESG risk management requirements; the *BoCom Green Finance Policy Package* and the *BoCom Transition Finance Policy Package* outline key policy priorities for our green finance and transition finance activities; the *BoCom Green and Low-Carbon Industry Map* guides branches in developing green finance businesses aligned with regional conditions.

The Bank prioritizes the development of green finance expertise and talent. We have established a multi-tiered training system, covering Head Office management as well as green finance professionals across the Head Office, branches, and subsidiaries. Through centralized training, professional skill competitions, site visits, and exchanges, we continue to strengthen the capabilities of our green finance teams across domestic and overseas operations.

4.2.2 Strategy

Green finance has long been a strategic priority for the Bank, shaping our business model, operations, and development strategy. According to the *Outline of the Development Plan of Bank of Communications Co., Ltd. for the 14th Five-Year Plan Period (2021-2025)*, which was reviewed and adopted by our Board, green finance is embedded across our four core business areas to promote balanced development in terms of scale, quality, and overall performance. In addition, the *Action Plan of BoCom for Carbon Peaking and Carbon Neutrality Goals* sets out our medium- and long-term objectives for green finance and charts a clear timetable and roadmap for advancing green finance in support of the "dual carbon" goals.

Integrating green finance into investment and financing activities

- We have refined and differentiated our credit policies and guidelines to provide more targeted support to priority industries, regions, and customer segments.
- We have adjusted how we allocate credit, approve transactions, assess risk, and set pricing to better support our strategic priorities.
- We have continuously improved risk mitigation and resolution approaches across our four key business areas, significantly enhancing our asset preservation and value creation capabilities.
- In the Yangtze River Delta, our key asset quality indicators outperform those of our regional peers. Our innovations in risk management and resolution have established a replicable model that can be scaled across the Bank.

4.2.3 Management of Impacts, Risks, and Opportunities

The Bank monitors ESG risk factors arising from our green finance activities and assesses their impact on overall credit risk. We apply ESG risk standards across the credit lifecycle, from credit assessment and approval to loan disbursement and post-lending management. We also establish clear ESG due diligence triggers and risk escalation procedures to support prudent and sustainable business practices.

Integrating ESG risk management across the credit lifecycle

- **Rigorous screening and due diligence**

We incorporate ESG factors into customer and project assessments and do not lend to entities or projects with serious legal or regulatory breaches or inadequate ESG performance. This enables early identification and assessment of potential risks.

- **Strengthened credit review and approval**

ESG performance forms an integral part of our overall credit risk assessment. Through comprehensive due diligence, we evaluate ESG risks and compliance of clients and their projects. Identified risks are reflected in formal credit documentation. We have also established a fast-track approval process to prioritize high-quality green finance clients.

- **Contract and fund disbursement management**

We include ESG-related covenants in credit agreements and use ESG risk profiles as an important factor in loan disbursement decisions. We continue to assess ESG risks during the disbursement stage to ensure ongoing risk control.

- **Enhanced post-lending management**

ESG performance is integrated into our routine post-lending monitoring. Where material risk signals arise, we conduct enhanced reviews and implement targeted mitigation measures. Significant ESG incidents are managed within our broader credit risk emergency response framework. We also closely monitor external developments that may affect clients and their industries.

Case: Shanghai Branch managed ESG risks through due diligence for a chemical client

In 2025, our Shanghai Branch conducted ESG due diligence for a chemical enterprise during the credit review of its syngas supply project and identified substantial transition benefits. Once operational, the project is expected to reduce carbon intensity to below the advanced benchmark set out in the *Shanghai Transition Finance Catalogue (Trial)*, cutting carbon dioxide emissions by approximately 939,800 tonnes annually. In light of these measurable environmental benefits, the Branch worked with the client to establish performance targets linked to emission reductions, along with corresponding information disclosure arrangements. Based on this framework, the

Branch extended a transition-linked loan to incentivize continued decarbonization.

The Bank has established a green credit classification framework for corporate clients, structured across three dimensions. Classification results are integrated into the credit process to enable differentiated management. Across the industry dimension, we apply a three-tier risk rating system—high, medium, and low—based on the ESG risk profile of the clients' industry and the project stage. Across the client dimension, we operate a dynamic ESG risk assessment mechanism that combines internal and external data to track ESG performance throughout the credit lifecycle. Across the business dimension, we classify relevant credit exposures in accordance with green credit statistical standards, based on the designated use of proceeds. This ensures the accuracy, reliability, and completeness of green loan data.

Case: BOCOM MSIG Life strengthens investment risk management through dynamic assessment and monitoring

BOCOM MSIG Life conducts at least one dynamic assessment of ESG performance and risk management practices each year for issuers of credit instruments, and applies differentiated post-investment management accordingly. Clients rated "Unsatisfactory" (Category I) are subject to monthly monitoring, and one to two on-site due diligence reviews each year. Their performance is reported at routine post-investment management meetings. Clients assessed as "Generally Satisfactory" (Category II) are monitored quarterly, with at least one on-site review each year. Key developments are also reported at routine post-investment management meetings. Clients rated "Satisfactory" (Category III) are monitored quarterly. Information is disclosed through regular post-investment reports. On-site reviews are conducted only when warranted based on risk considerations.

Case: Shanghai Branch strengthens risk controls through credit restrictions and rating adjustments

During post-lending monitoring of ESG performance, our Shanghai Branch identified that a construction client had received an administrative penalty from environmental authorities due to excessive dust emissions at a project site. In response, the Branch suspended any new credit facilities pending rectification, and revised the client's ESG risk rating to "Unsatisfactory". Through effective communication, the Branch urged the client to implement rectification measures, effectively mitigating the associated ESG-related credit risk.

Case: Zhejiang Branch leverages an ESG assessment system for lifecycle risk management in financing activities

Our Zhejiang Branch has developed a proprietary ESG assessment system, featuring an

intelligent early-warning module to support real-time monitoring of clients' ESG risks. The system assigns risk ratings and generates tiered alerts to enable differentiated risk responses. Supported by dedicated management policies, ESG assessment is integrated across the credit lifecycle. ESG scores and alert signals inform multi-dimensional risk analysis and are incorporated into credit reports to enable ongoing monitoring and closed-loop management of ESG risks. This enhances both the quality and efficiency of due diligence and credit approval. In 2025, the system flagged an elevated ESG risk at a traditional printing and dyeing enterprise that had been subject to repeated severe administrative penalties for environmental violations. In response, the Branch reduced the client's credit exposure and continued to monitor risk developments to reinforce proactive ESG risk oversight and safeguard asset quality.

4.2.4 Indicators and Targets

To advance green finance, the Bank has set phased targets for 2025, 2030, and 2060 in the *Action Plan of BoCom for Carbon Peaking and Carbon Neutrality Goals*. By the end of the "14th Five-Year Plan" period, we aim to achieve significant progress in green finance branding and product innovation, establish effective supporting systems and mechanisms, and integrate green and low-carbon principles into our operations and management, thereby strengthening our support for the "dual carbon" goals. Furthermore, we set differentiated green credit growth targets for each branch to strengthen target-based management. This approach encourages branches to leverage regional strengths and develop distinctive business models.

4.2.5 Green Finance Service System

Green finance remains a strategic priority for the Bank. We continue to strengthen our governance structure and policy framework while innovating in response to evolving market and client needs. Through high-quality financial solutions, we support a diverse range of clients in green investment and financing, green consumption, and low-carbon transition, thereby contributing to sustainable economic and social development. To mark the 20th anniversary of the "Two Mountains" development philosophy—which underscores the principle that ecological protection and economic development can advance together—the Bank partnered with leading media outlets to showcase examples of how our financial services support green transformation among our strategic clients. These cases were featured in videos and articles. Selected cases were included in the ESG case series of the Social Responsibility Forum organized by *People's Daily*.

4.2.5.1 Green Credit

The Bank has formulated the *BoCom Green Credit Implementation Measures*, setting out specific ESG management requirements for clients. We have also introduced industry-specific credit policies and mandatory management requirements for priority sectors, including agriculture, power, mining, and oil and gas. These policies clearly define prohibited practices and compliance standards, ensuring that credit resources are effectively allocated to support green transition across these industries.

BoCom's green credit policies

- **Agriculture**

The Bank has formulated the *Credit Policy and Investment Guidance for Modern Agriculture* to support the transition toward greener and lower-carbon production models. We continuously monitor and assess how changes in natural conditions, food safety standards, and environmental requirements may affect our clients' operations and adjust our existing credit portfolio accordingly to mitigate emerging risks. We do not lend to new clients that have been penalized by environmental or other competent departments within the past two years.

- **Biodiversity**

The Bank has formulated the *2025 BoCom Credit and Risk Policy Outline*, reaffirming our commitment to supporting areas such as biodiversity conservation. We have also established the *BoCom Green Credit Implementation Measures*, incorporating biodiversity-related risks into the comprehensive risk management system to ensure effective identification, monitoring, and mitigation of risks arising from business activities. We do not provide financing to clients or projects that pose significant environmental risks, endanger nationally protected wildlife or their habitats, or severely damage nature reserves, national key ecological function zones, or national parks.

- **Power**

The Bank has established the *Credit Policy and Investment Guidance for the Power Industry* to support the development of a modern power system centered on clean energy. We prioritize financing for clean energy generation, energy storage, ultra-high-voltage transmission, and smart grid infrastructure. We also support the upgrading of coal-fired power generation to advance its transition toward lower-carbon operations. We do not finance projects that fail to meet environmental requirements or have been ordered to suspend operations by regulatory authorities.

- **Mining**

The Bank has established the *Credit Policy and Investment Guidance for the Metal and Non-metal Mining and Processing Industry* to support the expansion of strategic mineral reserves and related production capacity. We provide financing for high-quality mineral resource projects,

including their construction, green transformation, intelligent upgrades, and safety improvements. We are also phasing out exposure to enterprises and projects with poor resource endowments, high operating costs, material safety and environmental hazards, or declining business viability. We do not finance entities or projects with serious regulatory violations, outdated mining technologies, non-compliant operations, or failure to meet applicable safety, environmental, and ecological requirements.

- **Oil and natural gas**

The Bank has established the *Credit Policy and Investment Guidance for the Petrochemical Industry* to support high-quality enterprises in digital transformation, intelligent upgrading, and energy efficiency and carbon reduction initiatives. We require projects to meet national standards on regulatory compliance, energy efficiency, and environmental performance as a condition for financing. Projects are placed on our exclusion list if they fail to implement mandated regional pollutant reduction or coal substitution measures, do not meet capacity phase-out or replacement requirements, or fall outside the environmental access controls established under the "Three Lines and One List" framework, which defines ecological protection redlines, environmental quality thresholds, resource utilization caps, and environmental access criteria.

Key Performance Highlights

As of the end of the reporting period,

The balance of green loans stood at RMB 950.825 billion, representing an increase of RMB 117.946 billion, or 14.16%, year to date.

Since securing funding under the Carbon Emission Reduction Facility (CERF), the Bank has disbursed RMB 30.918 billion in carbon emissions reduction loans across 569 projects in compliance with PBOC requirements as of the end of Q3 2025. These loans, with a weighted average interest rate of 3.28%, facilitate an estimated annual reduction of 6.5054 million tCO₂e.

Loans to the ecological protection, restoration, and utilization industry amounted to RMB 53.578 billion, up RMB 10.606 billion, or 24.68%, from the end of the previous year.

Case: Qingdao Branch supports Shandong Port in advancing its green transition

To support Shandong Port's green transition, our Qingdao Branch established an RMB 20 billion pre-approved credit line in 2025 at preferential rates to encourage further green investment. The facility supports the upgrade of automated terminals and the development of hydrogen energy initiatives. The Branch also integrated our open banking platform with "Port Easy Pay", the first integrated service platform in the port and shipping sector developed by Shandong Port. By

leveraging the port's credit standing, the Branch structured digital receivables to enhance access to financing for SMEs across the supply chain. As of the end of the reporting period, our Qingdao Branch had provided approximately RMB 1 billion in financing to more than 100 SMEs, supporting green packaging upgrades, the procurement of new energy transport equipment, and other efforts to support the port's broader green transition.

4.2.5.2 Green Bonds

The Bank has formulated the *BoCom Green Bond Framework* to govern our green bond business. Utilizing digital tools such as "BoCom e-Supervision", we monitor the use of bond proceeds to ensure they are directed to eligible green projects. In 2026, we will continue to expand the green bond portfolio in a prudent manner.

Key Performance Highlights:

As of the end of the reporting period,

The Bank had issued RMB 30 billion in green finance bonds, bringing our cumulative green finance bond issuance in the domestic interbank market to RMB 145 billion and allowing us to rank third in the market. We underwrote 54 green bonds with a total value of RMB 22.059 billion. We completed over 500 ESG bond investments and transactions, of which more than 300 involved green bonds. Our cumulative investment in ESG bonds exceeded RMB 100 billion, including over RMB 60 billion in green bonds. Green bonds accounted for more than 20% of our credit bond investment portfolio.

BOCOM International underwrote 24 green bonds and facilitated USD 9.746 billion in corporate financing, an increase of USD 334 million year-on-year.

BOCOM MSIG Life invested RMB 243 million in green bonds.

BOCOM International Trust invested RMB 1.817 billion in green bonds, a year-on-year increase of over 24%. The balance of green bonds stood at RMB 2.27 billion.

Case: BOCOM Leasing delivered two landmark green bond issuances

In March 2025, BOCOM Leasing issued the world's first US dollar green bond aligned with the *Multi-jurisdiction Common Ground Taxonomy* developed jointly by China, the European Union, and Singapore. This issuance facilitated cross-border green capital flows. In June 2025, BOCOM Leasing completed the first green finance bond issued by a non-bank financial institution in the domestic market in support of rural revitalization. The bond, with a total size of RMB 3.5 billion, achieved both the largest single-tranche size and the lowest coupon rate among non-bank

green bonds, effectively directing capital toward rural revitalization and green sectors.

Case: BoCom underwrote the market's first green bond linked to "two new" policy initiative by a financial leasing company

In June 2025, acting as the lead underwriter, the Bank facilitated the issuance of the 2025 First Tranche Green Bond of CNOOC International Financial Leasing Co., Ltd. The transaction marked the first debt financing instrument issued by a financial leasing company in the market, combining green objectives with the large-scale equipment renewal and consumer goods trade-in initiative ("two new" policy initiative). Proceeds will be used to finance the expansion of a liquefied natural gas (LNG) receiving terminal to deliver significant benefits in carbon emissions reduction, energy efficiency improvement, environmental protection, and pollution control, thereby advancing the decarbonization of energy infrastructure.

4.2.5.3 Green Investment

As of the end of the reporting period, BOCOM MSIG Life's green investment balance stood at RMB 4,309 million, representing a year-on-year increase of 36.18%. The portfolio comprised RMB 4,061 million in green insurance-related investments, RMB 243 million in green bonds, and RMB 5 million in green equity investments.

Case: BOCOM MSIG Life supports regional low-carbon transition through investment in a long-distance heating pipeline project

BOCOM MSIG Life invested in a long-distance heating pipeline connecting the Tuoketuo Power Plant and Hohhot. The project is the longest of its kind in Asia and features the largest pipe diameter as well as the highest transmission and heat exchange capacity among comparable projects. During the 2024–2025 heating season, the project provided heating services covering 53 million square meters, accounting for nearly one-third of Hohhot's total heated area, and serving as a key component of the regional heating infrastructure. To date, the project has delivered 20.014 million gigajoules of thermal energy, equivalent to saving 470,000 tonnes of standard coal and reducing carbon dioxide emissions by about 1.22 million tonnes. The project highlights the role of green investment in supporting public services while delivering tangible environmental benefits.



The Tuoketuo Power Plant–Hohhot long-distance heating pipeline

Case: BOCOM Investment supports green transition through market-based investment in emerging strategic sectors

BOCOM Investment focuses on emerging strategic sectors such as clean energy and environmental protection, helping companies strengthen their capital base and optimize their capital structure through market-based debt-to-equity swaps. On July 23, 2025, BOCOM Investment invested RMB 2.4 billion in the capital increase project of State Grid Xinyuan Company Limited, marking the largest cash capital raise ever executed through a state-owned asset exchange. The transaction contributes to the sustainable growth of the pumped-storage hydropower industry. This investment underscores BOCOM Investment's continued commitment to expanding its green finance portfolio through market-based financial instruments.

4.2.5.4 Green Funds

BOCOM Schrodgers actively integrates ESG principles into its investment strategies and has developed a range of ESG-focused products, including three ESG-themed funds.

ESG ESG Fund	Features
BOCOM Schrodgers SSE 180 Corporate Governance ETF Feeder Fund	The fund selects index constituents based on corporate governance assessments, focusing on listed companies with strong governance practices and stable performance. Companies rated C or below under the CSI ESG framework are excluded, thereby enhancing the governance orientation of the index and reinforcing sustainable investment principles.
BOCOM Schrodgers CNI New Energy Index Fund (LOF)	This fund tracks the CNI New Energy Index, whose constituent companies are primarily engaged in the new energy and new energy vehicle (NEV) sectors.

BOCOM Schrodgers CSI Environmental Governance Index Securities Investment Fund (LOF)	The fund tracks the CSI Environmental Governance Index, and its portfolio comprises listed companies engaged in environmental protection activities such as wastewater treatment, solid waste management, air pollution control, and energy conservation and recycling. It reflects a strong focus on environmental sustainability.
--	---

4.2.5.5 Green Wealth Management

BOCOM Wealth continues to develop innovative green financial products and services, directing capital toward green and low-carbon sectors to support industrial upgrading and corporate transition initiatives.

Case: BoCom launched China's first wealth management product linked to the technology finance bond index

On June 17, 2025, the Bank launched the BOCOM Wealth Stable Bond Daily-Open (180-Day Holding Period) (Technology Finance Index). It marks the first wealth management product in China linked to the Shanghai Clearing House BOCOM Wealth Technology Finance Bond Index. The product's returns are tied to the performance of the underlying index. Investments focus on bonds issued by technology-driven enterprises, as well as innovation-related notes and bonds whose proceeds are earmarked for technological innovation. Through this structure, the product directs capital toward priority areas in China's innovation ecosystem.

4.2.5.6 Green Leasing

BOCOM Leasing is committed to green development under the "BoCom Green Finance" brand and continues to expand its green leasing portfolio. In 2025, the company expanded financing support for green shipping, with green vessel investments exceeding RMB 16 billion. It delivered China's first carbon-neutral vessel and completed the country's first transition-aligned leasing transaction for a shipping project. BOCOM Leasing also supported the aviation sector's green transition, with next-generation, lower-emission aircraft accounting for more than 80% of new aircraft lease placements during the year. Through the Shanghai Financial Leasing Asset Circulation Center, the company executed renewable energy leasing and operating lease asset transfer transactions, both recognized as industry firsts. During the year, it further completed its first direct leasing project for ultra-fast charging stations, its first green power trading transaction for a distributed residential PV project, and its first green electricity certificate trading transaction for a PV project.

Key Performance Highlights:

As of the end of the reporting period, BOCOM Leasing's balance of green leasing assets under the PBOC standards exceeded RMB 36 billion, up more than 40% year to date.

Honors and Awards:

BOCOM Leasing:

The company was recognized as an "Outstanding Institution for Green Finance Services in Shanghai's Banking Industry" by the Shanghai Banking Association.

The "Younergy Lease" distributed PV green leasing product was named an "Exemplary Green Finance Case in Shanghai's Banking Industry" by the Shanghai Banking Association.

The "Green Electricity Transport: 'Battery Bank' Operating Lease Project" was recognized as a "Best Case in the Second National Green Financial Leasing Innovation Cases" by the Shanghai Financial Leasing Association.

The project "Writing a New Chapter of a Zero-Carbon Future through Financial Services" was selected as a "2025 Climate Action: Zero-Carbon Transition Practice Case" by Xinhuanet and Shanghai Climate Week.

The "China's First SPV New Energy Equipment Leasing Project for Green and Sustainable Development" received the "Climate Investment and Financing Innovation Award" at the 2nd Xinhua Credit Mingzhu Cup Awards, organized by the Xinhua News Agency Guangdong Branch and China Economic Information Service (CEIS).

The project "Advancing Green Transition through Financial Leasing" received the "Green Finance Practice Award" at the 4th Xinhua Credit Jinlan Cup Sustainable Development Awards, organized by the CEIS.

The company received the "Model Award for Sustainable Governance" at the 2025 Yicai China Corporate Social Responsibility Awards.

Case: BOCOM Leasing delivered China's first "carbon-neutral" vessel

In January 2025, BOCOM Leasing delivered the "GREEN RIZHAO", a 77,000-dwt new-generation multi-purpose pulp carrier built for COSCO SHIPPING Specialized Carriers. During construction, all greenhouse gas (GHG) emissions generated were offset, earning the vessel a carbon neutrality certificate from the China Classification Society (CCS). It is the first vessel in China to undergo and pass a certified carbon neutrality assessment during construction. The project sets a benchmark for low-carbon shipbuilding and supports the global shipping industry's transition toward decarbonization.



China's first carbon-neutral vessel "GREEN RIZHAO"

Case: BOCOM Leasing completed its first sustainability-linked financial leasing transaction

In February 2025, BOCOM Leasing executed its first sustainability-linked financial leasing transaction with Ningbo Asia Pulp & Paper Co., Ltd., with a total lease amount of RMB 200 million. The lease pricing is linked to the lessee's performance against five sustainability performance targets (SPTs) derived from key environmental performance indicators (KPIs). These targets include: reducing COD emissions per unit of output, lowering wastewater discharge per tonne of product, decreasing BOD concentration levels, increasing annual environmental philanthropy contributions, and increasing annual community engagement activities. Interest rate reductions are tiered based on the number of targets achieved. This innovative model establishes a replicable and scalable benchmark for sustainability-linked leasing within the industry.

4.2.5.7 Green Insurance

BOCOM MSIG Life has introduced public transportation accident insurance for green mobility scenarios, alongside green life and personal accident coverage that provides lifecycle protection. These offerings enhance financial protection for consumers who choose low-carbon travel and for professionals working in green industries. BOCOM Insurance has expanded home insurance solutions to address climate-related risks and provides comprehensive commercial coverage for clean energy facilities such as solar and wind power installations, thereby supporting the reliable operation of green infrastructure.

4.2.5.8 Green Trust

BOCOM International Trust launched a Pre-REIT equity trust product in the renewable energy sector, backed by distributed PV power station assets of Chint Energy. This product expands the equity investment portfolio and supports capital allocation toward sectors aligned with the "dual carbon" goals.

Case: Dedicated green equity trust sets a benchmark for green finance practice

BOCOM International Trust, in collaboration with leading industry partners and institutional investors, launched a dedicated equity trust vehicle to invest in household distributed PV power stations with a total installed capacity of 148 MW. The project unlocks value from existing green assets and is expected to reduce CO₂ emissions by approximately 277.27 million tonnes over its lifecycle. At the same time, it will provide long-term stable income for 5,478 rural households across Shandong, Hebei, Shaanxi, Shanxi, and Tianjin. On December 16, 2025, the "BOCOM International Trust – Chint Energy Household Distributed PV Equity Investment Green Trust" project was named one of the "Top 10 Green Trust Cases of 2025" by the China Trustee Association. It establishes a benchmark for advancing environmental and social sustainability in the industry.



Chint Energy's distributed PV power station project

4.2.5.9 Green Consumption

The Bank has expanded green finance offerings for retail customers through innovative products and service models, thereby encouraging more sustainable consumption choices. We launched an NEV installment financing program, which offers tailored financial solutions to improve vehicle affordability and reduce upfront costs. As of the end of the reporting period, this

program had served over 400,000 customers, with cumulative funding exceeding RMB 50 billion to support the wider adoption of NEVs and sustainable lifestyles.

4.3 Pollutant Discharge

The Bank strictly complies with all applicable environmental laws and regulations, including the *Environmental Protection Law of the People's Republic of China*, the *Law of the People's Republic of China on the Prevention and Control of Atmospheric Pollution*, and the *Measures for the Administration of Legal Disclosure of Enterprise Environmental Information*. The primary pollutants generated from our operations include exhaust emissions from the vehicle fleet, flue gas from gas-fired equipment, and office wastewater. We have implemented specialized pollutant control measures to minimize potential environmental and social impacts. As of the end of the reporting period, the Bank had not experienced any environmental pollution incident and was not included in the list of enterprises required to disclose environmental information.

The Bank has established annual discharge limits for air pollutants from boilers. To achieve these targets, we employ low-nitrogen oxides (NO_x) combustion technologies such as flue gas recirculation, staged combustion, and combustion optimization controls. These technologies reduce NO_x emissions by recirculating low-temperature flue gas to lower flame temperature, implementing staged air injection to prevent early high-temperature oxygen-rich combustion, and optimizing the fuel-air ratio to ensure boilers operate at an appropriate excess air level.

Annual discharge limits for boiler air pollutants (Head Office)

NO_x (NO₂ equivalent): 50 mg/m³

Sulfur oxides (SO₂): 10 mg/m³

Particulate matter (PM): 10 mg/m³

Pollution control measures

- **Promoting equipment upgrades**
Advancing the electrification of canteen facilities and retrofitting gas-fired boilers with low-NO_x burners to reduce NO_x emissions
- **Enhancing wastewater management**
Installing greywater reuse systems in key water-use areas, such as restrooms and canteens, to improve water resource efficiency and reduce wastewater discharge
- **Developing green transportation**
Procuring new energy vehicles for official use and installing electric vehicle charging stations to support electric mobility and reduce vehicle exhaust emissions

Table: Head Office vehicle usage in 2025

Vehicle Type	Distance Traveled (km)	
Light vehicles (≤ 2.5 tonnes)	402,845	
Light vehicles (2.5-3.5 tonnes)	174,054	
Light vehicles (3.5-5.5 tonnes)	37,213	
Medium and heavy vehicles (5.5-15 tonnes)	31,689	
Fuel Type	Consumption (L)	Per Capita (L/person) (based on 13,269 persons)
Diesel	6,235.98	0.47
Gasoline	72,776.06	5.48

Table: Head Office emissions in 2025

Pollutant	Emissions (tonne)
NO _x	1.485
SO _x	0.038
PM	0.038

4.4 Waste Disposal

The Bank complies with applicable environmental laws and regulations, including the *Law of the People's Republic of China on the Prevention and Control of Environment Pollution Caused by Solid Wastes*, the *Measures for the Administration of the List of Key Environmental Monitoring Entities*, and the *Measures for the Transfer of Hazardous Wastes*. The Bank has also issued the *Implementation Plan of BoCom for Green Operations in 2025* to further strengthen waste management. All waste generated from our operations is handled and disposed of by qualified professional service providers in accordance with relevant regulations. For hazardous waste, we have established standardized management procedures, clearly defined roles and responsibilities

of each unit, and implemented standardized labeling and storage signage. For key hazardous wastes such as spent fluorescent lamps, we apply a structured process, requiring case-by-case approval and documentation. Management plans are reported and transfer manifests are processed through the Shanghai Hazardous Waste Management Information System. This ensures that waste collection and disposal are carried out by authorized service providers with designated personnel, fixed timelines, and approved transport vehicles. As of the end of the reporting period, our Head Office had disposed of 815 kg of spent fluorescent lamps and 750 kg of used printer cartridges.

Table: Waste disposal targets for Head Office buildings and parks

Non-hazardous waste generation in 2025 was targeted to decrease by 5% from 2023; the actual reduction was 14.89%.

Note: Head Office buildings and parks refer to the Bank's five office locations in Shanghai, including Lujiazui (BoCom Financial Towers), Zhangjiang, Hongqiao (Jinming Building), Gaoke, and Caohejing.

Table: Group-wide non-hazardous waste discharge in 2025

Waste	Total Volume (tonne)	Per Capita Volume (tonne/person) (based on 133,137 persons)
Household waste	4,235.67	0.032
Kitchen waste (including wet waste)	3,341.97	0.025
Group-wide paper consumption	1,554.80	0.012
Total	9,132.44	0.069

Note: The group had 133,137 energy-consuming employees in 2025 (including dispatched employees).

Table: Head Office electronic waste discharge in 2025

Waste	Total Volume (unit)	Per Capita Volume (unit/person) (based on 13,269 persons)
Mainframe	302	0.023
Display	302	0.023

Laptop	324	0.024
Printer	41	0.003
Duplicator	4	0.0003

Table: Head Office hazardous waste disposal in 2025

Waste	Total Volume (tonne)	Per Capita Volume (kg/person) (based on 13,269 persons)
Spent lamps	0.815	0.061
Printer cartridges	0.75	0.057

4.5 Ecosystem and Biodiversity Conservation

The Bank prioritizes ecological protection and strictly observes red lines for ecological conservation. We comply with management requirements for protected ecological areas where we operate and promote harmony between people and nature.

In business operations, the Bank applies red lines for ecological conservation as a critical constraint in credit decision-making. For industries with significant biodiversity impacts, we incorporate clear requirements for biodiversity and ecological risk management into our credit policies. We have formulated the *BoCom 2025 Credit and Risk Policy Outline*, which explicitly supports financing needs in areas such as biodiversity conservation. We have also developed the *BoCom Green Credit Implementation Measures*, which mandate the integration of ESG risks into the comprehensive risk management system to identify, monitor, prevent, and control risks associated with ecological protection, environmental pollution, climate change, and biodiversity in our business activities. We do not provide financing to clients or projects that pose significant environmental risks, endanger state-protected wildlife or their habitats, or cause severe damage to ecologically sensitive areas such as nature reserves, key national ecological function zones, and national parks.

Case: Jiangxi Branch pioneered a biodiversity loan for national reserve forests to support ecological conservation

In November 2025, our Jiangxi Branch extended a biodiversity conservation loan of RMB 40 million to a forestry ecological resource development company in Fuliang County to support the

development of a national reserve forest project. This represents one of the first third-party certified biodiversity loans for national reserve forests in Jiangxi Province, and marks an innovative attempt by the enterprise to leverage financial resources for biodiversity conservation. The loan is expected to support forest conservation across approximately 304.12 hectares, achieving annual carbon sequestration of 532.28 tonnes and oxygen release of 387.12 tonnes. This initiative serves as a practical model for financial institutions to facilitate value creation of ecological assets and contribute to the development of a Beautiful China.

Case: Guangdong Branch safeguards marine ecosystems through biodiversity-linked lending

Breaking away from traditional credit assessment models, our Guangdong Branch incorporated corporate biodiversity conservation performance into the credit evaluation framework. In October 2025, the Branch provided an unsecured loan of RMB 2 million at a preferential interest rate to a fisheries company in Shantou to support its offshore aquaculture project. The project pioneered an integrated aquaculture model combining fish, shellfish, and algae, enabling the natural purification of aquaculture effluent while maintaining marine ecological balance. Through this lending support, the Branch effectively translated the company's ecological investments into improved financing terms, demonstrating how financial instruments can support industrial green transformation.

4.6 Environmental Compliance Management

The Bank strictly complies with applicable environmental laws and regulations, including the *Environmental Protection Law of the People's Republic of China*, the *Law of the People's Republic of China on Environmental Impact Appraisal*, and the *Energy Conservation Law of the People's Republic of China*. The Bank has developed and periodically updates the overall contingency plan and specialized emergency response plans to ensure business continuity. These plans establish clear mechanisms for disaster reporting, emergency decision-making, command, and coordination in response to situations such as natural disasters. In the event that personnel, facilities, systems, or external services become unavailable due to climate-related disruptions, we can activate emergency response procedures to mitigate potential impacts and ensure the continued operation of critical business functions. As of the end of the reporting period, the Bank

was not subject to any major administrative penalties from ecological and environmental authorities or held criminally liable for environmental incidents.

4.7 Energy Utilization

The Bank strictly adheres to the *Energy Conservation Law of the People's Republic of China* and other applicable national laws, regulations, and local policies. While meeting our energy needs for high-quality development, we actively monitor both total energy consumption and energy intensity, strengthen the management of energy-consuming equipment, and continuously enhance energy efficiency. The Bank also promotes the development of green data centers and carbon-neutral outlets. As of the end of the reporting period, a total of 40 outlets obtained certifications for carbon neutrality, carbon offsetting, or green and low-carbon operations.

The Bank actively promotes green development and uses "carbon neutrality" as a key driver to advance the low-carbon transition. The development of carbon-neutral outlets has been carried out across the Bank. The Bank conducts comprehensive carbon accounting across all operational activities and continues to explore diversified carbon offset mechanisms. Green electricity certificates were purchased at scale, reaching 5 million kWh in 2025, to replace conventional power consumption. In addition, we invested in high-quality carbon sink projects and purchased verified emissions reductions (including CERs and CCERs) to offset the remaining emissions of our outlets (9,797 tonnes of emissions offset). Through these efforts, we have successfully established a model for carbon-neutral operations.

Energy management initiatives

- **Improving energy management mechanisms**

An Energy Management Team has been established to promote energy conservation and emissions reduction across all operations, employees, and processes. Energy consumption data is monitored and recorded on the "Smart Corporate Service" platform to support energy analysis and consumption forecasting.
- **Promoting green buildings**

Energy efficiency indicators are incorporated as key considerations when constructing, purchasing, or leasing office premises. New business premises are designed, constructed, and operated in accordance with the *Assessment Standard for Green Building*. During the renovation and retrofitting of existing premises, environmentally friendly materials as well as advanced construction technologies are adopted to improve building energy efficiency.
- **Deploying energy-efficient equipment**

The Bank promotes the use of high-efficiency equipment, including best-in-class energy-efficient appliances and LED lighting. Key systems in office buildings, including air conditioning and lighting, have been upgraded to improve energy efficiency. At the Zhangjiang Park, the Bank

piloted the use of air-source heat pumps to replace conventional boilers for domestic hot water supply, thereby reducing natural gas consumption.

- **Utilizing clean energy**

The Bank has developed a green electricity procurement plan and signed long-term agreements with clean energy suppliers to increase the share of renewable electricity in its operations. Distributed photovoltaic systems are being deployed on rooftops, parking canopies, and available spaces at office buildings and large branch premises.

The Bank is advancing the development of green data centers. At Pujiang Park, we have piloted refined energy management for data center equipment to identify energy-saving opportunities. As a result, the average Power Usage Effectiveness (PUE) of our data centers has dropped to 1.48, marking progress toward interim carbon reduction targets and improving the overall sustainability of our operations.

Green data center development initiatives

- **Strengthening management of green operations goals**

The Bank sets energy efficiency and carbon emissions targets for data centers. Leveraging a digital energy management system, we enhance monitoring and analysis of energy use and load conditions, and improve the overall efficiency of power systems.

- **Promoting high-standard construction and retrofitting**

Taking energy conservation and carbon reduction as key priorities, the Bank promotes green practices in both the construction of new data centers and the retrofit of existing facilities. By establishing a green operations and maintenance framework and adopting energy-efficient equipment and technologies such as free cooling, we continue to reduce energy consumption.

- **Accelerating equipment upgrades and technological innovation**

The Bank has upgraded aging infrastructure through the replacement of UPS systems at the Zhangjiang Park and the refurbishment and energy-efficiency retrofits of all existing server rooms. For newly constructed data centers, we have introduced technologies such as liquid cooling and indirect evaporative cooling, while exploring the use of renewable energy and green power. These efforts aim to ensure that the design PUE for our Guiyang and Hohhot data centers remains below 1.2.

Honors and Awards:

BoCom Financial Towers received Gold Prize in the 2024 "Green and Low-Carbon Renovation of Existing Buildings in Shanghai" evaluation by the Shanghai Green Building Council.

BoCom Pujiang Data Center (Phase I) was included in the *2025 National Green Computing Infrastructure List* jointly released by the Ministry of Industry and Information Technology, the

National Development and Reform Commission, the Ministry of Commerce, the National Financial Regulatory Administration, the National Government Offices Administration, and the National Energy Administration.

Table: Energy management for Head Office buildings and parks

Target: Electricity consumption in 2025 was targeted to decrease by 3% from 2023; the actual reduction was 15.85%.
Target: Natural gas consumption in 2025 was targeted to decrease by 3% from 2023; the actual reduction was 3.58%.

Note: Head Office buildings and parks refer to the Bank's five office locations in Shanghai, including Lujiazui (BoCom Financial Towers), Zhangjiang, Hongqiao (Jinming Building), Gaoke, and Caohejing.

Table: Group energy consumption in 2025

Indicator	Total	Per Capita (based on 133,137 employees)
Power consumption	771,854,227.50 kWh	5,797.44kWh/person
Natural gas consumption	5,825,162.40 m ³	43.753 m ³ /person
Gasoline consumption	2,620,236.41L	19.681 L/person
Diesel consumption	119,779.29 L	0.900 L/person
Total energy consumption (standard coal equivalent)	108,507.64 tonnes	0.815 tonnes/person

Note: The group had 133,137 energy-consuming employees in 2025 (including dispatched employees).

4.8 Utilization of Water Resources

The Bank complies with applicable water-related laws and regulations, including the *Water Law of the People's Republic of China* and the *Water Pollution Prevention and Control Law of the People's Republic of China*. We also adhere to internal management policies such as the *Management Measures of BoCom for Green Operations* and the *Implementation Plan of BoCom for Green Operations in 2025*. All water used for our daily operations and office activities is sourced from the municipal water supply system. We are committed to advancing water conservation initiatives in our operations.

Table: Water consumption target of the Group

Total water consumption of the Group in 2025 was targeted not to exceed 4 million tonnes.

Water resource management initiatives

● **Establishing a water-saving bank**

By installing submetered water meters with remote monitoring capabilities and building an intelligent water management platform, the Bank has completed water balance testing and actively worked to become a water-saving bank.

● **Implementing dynamic monitoring and control**

Water consumption is monitored in real time through the "Smart Corporate Service" platform. Potential risk points are promptly identified and addressed to prevent water losses caused by leaks or equipment failures.

● **Promoting the application of water-saving technologies**

The Bank promotes water-saving technologies, such as reclaimed water treatment and reuse, as well as the reuse of high-temperature boiler wastewater to improve water utilization efficiency. Physical treatment technologies for air-conditioning circulating water have been adopted, reducing the need for pipeline flushing following chemical treatment, thereby conserving water resources.

Key Performance Highlights:

As of the end of the reporting period,

the Group used 3,897,861.45 tonnes of water and achieved per capita water consumption of 29.28 tonnes per person.

4.9 Circular Economy

The Bank actively promotes the concept of a circular economy. Resource consumption is reduced at the source by prioritizing the procurement of recycled supplies and encouraging the reuse of office materials. In addition, we have implemented a systematic program for waste sorting and recycling, and entered into a long-term strategic partnership with a licensed third-party enterprise specializing in the recycling and treatment of electronic waste. Through standardized waste sorting and recycling procedures and a rigorous oversight mechanism, we ensure that all discarded electronic equipment is processed through compliant recycling channels. As a result, electronic waste is fully collected and 100% recycled or recovered to support a resource-efficient green office environment.

At the Pujiang Data Center, rainwater harvesting systems have been installed to collect rainwater for landscape irrigation. The data center also applies waste heat recovery technology, capturing residual heat from server rooms and repurposing it for the office building's heating system. This enables full heating coverage for the office area and supports our circular economy

objectives.

Table: Packaging materials used for finished products in 2025

Indicator	Unit	Value
Total packaging materials used for finished products	tonne	532.53
Packaging intensity of finished products	tonne/10,000 envelopes	0.52
Total weight of credit card envelopes	tonne	65.75
Weight per credit card envelope (in multiple specifications)	g	6、 10
Total weight of credit card covers	tonne	405.89
Weight per credit card cover	g	40
Total weight of credit card letters	tonne	60.88
Weight per credit card letter	g	6

Note: Packaging materials for finished products include credit card envelopes, credit card covers, and credit card letters.

5 Society

Embracing Sustainable Development Trends

The Bank actively fulfills social responsibilities by supporting employee development, enhancing customer experience, strengthening supply chain resilience, and giving back to the community. Through these efforts, we contribute to building a more inclusive future.

Aligning with SDGs



Sustainable Development Issues

Employees; Product and service security and quality; Data security and customer privacy protection; Supply chain security; Fair treatment of SMEs; Ethics of science and technology; Social contributions.

Our performance

Our employees received an average of 127 hours of training, and we conducted 1.49 billion financial literacy outreach activities. Charitable donations totaled RMB 64,732,600, supporting 216 public welfare projects. Our employees also contributed 390,821 hours of volunteer service.

5.1 Employees

The Bank is committed to fostering a workplace where employees grow and succeed together with the Bank. We strive to build a healthy, harmonious, respectful, and inclusive environment while providing diverse opportunities for employee development. By safeguarding employees' lawful rights and interests, we promote the alignment of individual growth with the Bank's long-term development.

5.1.1 Governance

The Bank strictly abides by applicable laws and regulations, such as the Labor Law of the People's Republic of China, the Labor Contract Law of the People's Republic of China, the Regulations on the Implementation of the Labor Contract Law of the People's Republic of China, the Interim Provisions on Labor Dispatch, the Social Insurance Law of the People's Republic of China, the Regulations on Work-Related Injury Insurance, and the Provisions on the Prohibition of Using Child Labor. We have formulated internal policies, such as the Measures of BoCom for Employment Contracts, the Management Measures of BoCom for Employee Recruitment, Hiring and Transfer Management, the Management Measures of BoCom for Employee Leave and Attendance, the Management Measures of BoCom for Special Working Hours, the Management Measures of BoCom for Employee Dismissal and Resignation, the Opinions on Strengthening and Improving Management of Dispatched Workers, the Management Measures of BoCom for Prudent Remuneration, and the Management Measures of BoCom for Supplementary Medical Insurance of Banking Institutions on the Chinese Mainland and the Management Measures of BoCom for Education and Training. With these measures, we have put in place a complete set of policies on employee management, care, and support to effectively safeguard their fundamental rights and interests.

5.1.2 Strategy

The Bank advances corporate strategy and employee development as two parallel priorities. We implement both annual and medium- to long-term training programs, including those outlined in the *Education and Training Plan for Cadres and Employees of Bank of Communications (2023-2027)*, providing sustained support for strategy execution and staff development.

5.1.3 Management of Impacts, Risks, and Opportunities

The Bank considers employees as an important part of corporate governance, and has established a comprehensive talent management system covering recruitment and workforce allocation, career development, and training. We expand employment opportunities, optimize our talent mix, broaden career pathways, and continuously strengthen our training programs. Through

these efforts, we not only create employment opportunities but also effectively address risks related to employee turnover and skills gaps. By investing in people, we turn human capital into a strategic asset that supports business transformation and enhances organizational resilience, thereby creating value for both society and the Bank.

5.1.4 Indicators and Targets

The Bank develops annual training plans aligned with the overall corporate strategy. We deliver training through both online and in-person formats, and tailor learning sessions for different employee groups to ensure full participation. Each employee is required to complete at least 90 hours of training while management personnel complete at least 110 hours annually. In addition, each employee completes a minimum of 50 hours of online learning each year.

5.1.5 Protecting Employees' Rights and Benefits

The Bank protects employees' rights and interests by ensuring equal employment opportunities, improving compensation and benefits, and strengthening employee participation in corporate governance. Through these efforts, we provide a workplace where employees feel safe, respected, and treated with dignity, and where they can share in our future.

5.1.5.1 Employment

The Bank is committed to equal opportunity and equal pay for equal work. We maintain a transparent, fair, competitive, and merit-based recruitment process, and strictly prohibit discrimination based on factors such as gender, ethnicity, place of origin, or religion. We enforce rigorous qualification standards and prohibit illegal practices such as the use of child labor and forced labor. Any violations will be addressed in accordance with the *Measures of BoCom for Handling Employee Misconduct*. Our workforce consists of regular employees under labor contracts (full-time) and dispatched employees engaged through third-party agencies (full-time). In 2025, no major labor disputes were recorded.

The Bank aligns with national employment priorities by expanding hiring and offering diverse career opportunities for candidates from a wide range of professional backgrounds, thereby contributing to a stable and improving labor market.

Key Performance Highlights:

As of the end of the reporting period,

Group employees (including banking institutions on the Chinese mainland, branches (sub-branches) outside the Chinese mainland and subsidiaries): 97,932

Employees of banking institutions on the Chinese mainland: 91,669

Employees of subsidiaries (excluding those assigned to subsidiaries from the Head Office and branches): 3,649

Local employees of branches (sub-branches) outside the Chinese mainland: 2,614

Distribution by gender (banking institutions on the Chinese mainland)

Male: 41,146

Female: 50,523

Distribution by age (banking institutions on the Chinese mainland)

30 and under: 25,115

31-50: 53,847

51 and over: 12,707

Distribution by employment type (banking institutions on the Chinese mainland)

Regular: 86,959

Dispatched: 4,710

Distribution by region (banking institutions on the Chinese mainland and branches (sub-branches) outside the Chinese mainland, excluding subsidiaries)

Yangtze River Delta: 24,253

Central China: 15,367

Bohai Rim: 14,845

Western China: 12,694

Pearl River Delta: 10,485

Northeast China: 8,566

Head Office: 5,459

Local employees of branches (sub-branches) outside the Chinese mainland: 2,614

Distribution by educational background (banking institutions on the Chinese mainland)

Less than a bachelor's degree: 7,385

Bachelor's degree: 64,171

Master's degree or above: 20,113

Employee turnover rate (banking institutions on the Chinese mainland)

Male: 1.24%

Female: 1.35%

Aged 30 and below: 3.08%

Aged 31-50: 0.64%

Aged 51 and above: 0.13%

Yangtze River Delta: 1.44%

Central China: 1.38%

Bohai Rim: 0.89%

Western China: 1.36%

Pearl River Delta: 2.05%

Northeast China: 0.73%

Head Office: 0.91%

Honors and Awards:

"Top 100 Employer Excellence of China 2025 and Digital HR Excellence 2025" from 51job.com

"China Best Employer Award 2025" from zhaopin.com

Optimizing the Talent Development System and Improving the Quality of In-house Talent Development won the "Outstanding Case" award at the 2025 (7th) National Talent Work Innovation Cases Competition.

5.1.5.2 Compensation and Benefits

The Bank provides employees with compliant and stable compensation. We align pay with value creation while maintaining fairness, with a clear focus on accountability, frontline roles, and

performance, thereby enhancing the incentive effect of our compensation system. We also offer a comprehensive employee care and benefits program, including holiday benefits, and birthday and life-event support. In addition, we have piloted inclusive childcare services for employees' children, contributing to a more family-friendly workplace.

The Bank has established and disclosed a performance assessment management framework that sets forth evaluation criteria, methods, and procedures. We conduct regular performance assessments for active employees and hold year-end performance feedback sessions. The assessment supervisor informs the employees of the assessment results, assists in developing targeted improvement plans, and helps them improve job skills and achieve continuous growth.

<p>Key Performance Highlights:</p> <p>As of the end of the reporting period,</p> <p>100% of our employees had signed labor contracts.</p> <p>We made timely and full contributions to social insurance for all employees, including basic medical and work-related injury insurance and provided supplementary group medical insurance.</p> <p>100% of employees were eligible for non-salary benefits.</p>
--

5.1.5.3 Democratic Management

The Bank safeguards the democratic rights of employees in accordance with the law. We provide structured channels and effective feedback mechanisms to ensure that employees are extensively engaged in democratic decision-making, management, and oversight, thereby fostering a strong sense of ownership.

Initiatives for democratic management

<p>Strengthening employee participation channels</p>	<ul style="list-style-type: none"> ● We have improved the employee participation management system centered on the workers' congress and supported by disclosure of bank affairs . We review and approve policies and procedures that directly affect employees, organize employee representatives to receive updates on our annual operating performance and key developments, and hold feedback sessions on business operations. These mechanisms help ensure
--	--

	<p>employees' rights to information, participation, expression, and oversight.</p> <ul style="list-style-type: none"> ● We also gather employee feedback through surveys, site visits, and discussion sessions.
Establishing a proposal feedback mechanism	<ul style="list-style-type: none"> ● We have created a closed-loop process for the collection, review, response, and evaluation of employee proposals. We hold meetings to review and advance such proposals, and track progress to ensure timely responses to employee concerns.
Managing and resolving labor disputes	<ul style="list-style-type: none"> ● Labor dispute mediation committees at all levels are fully utilized to continuously follow up on the handling of labor dispute matters.
Employee satisfaction survey	<ul style="list-style-type: none"> ● Every year, we conduct surveys to understand the perspectives and engagement of young employees through anonymous online questionnaires and discussion sessions. Participants come from provincial and directly-managed branches, credit card centers, service centers, domestic subsidiaries, and Head Office departments. The survey covers areas such as political ideology, career development, organizational support, workplace experience expectations, and stress management. The 2025 survey results show that young employees are generally satisfied with their current work. 90.9% gave positive feedback on the professionalism and work attitude of their colleagues, and 90.8% appreciated the Bank's efforts in supporting their growth and career development.

5.1.6 Facilitating Employee Development

The Bank removes barriers to career progression by improving career pathways and building professional capabilities through structured training programs. We aim to align employee

development with our strategic priorities and translate our people's potential into sustained competitive strength.

5.1.6.1 Empowering Employee Growth

The Bank has established a structured training and development framework aligned with the Bank's strategic priorities and employees' career development. We have formulated the *Education and Training Plan for Cadres and Employees of Bank of Communications (2023-2027)* and annual training plans to build capabilities across our workforce.

Initiatives for talent cultivation

<p>Establishing a tiered and categorized training system</p>	<ul style="list-style-type: none"> ● We have established a multi-level succession planning framework, covering the Senior Management, middle-level managers, high-potential young talents, and grassroots employees. We have also continuously advance the "Hundreds, Thousands, Tens of Thousands" key talent quality enhancement initiative to achieve tangible and sustained results, simultaneously advance organization-wide skill and knowledge development programs, with targeted training at different stages, including onboarding, role-based training, and promotion orientation programs. In 2025, we delivered 1,128 training sessions for the management, 1,237 for specialists, 8,671 for business staff, and 2,539 for other employees. ● We have developed a network of internal trainers across the Bank, supporting 30 provincial and directly-managed branches, 6 Head Office departments, and 1 subsidiary. This move has facilitated the strategic transformation and business development of the Bank. ● We deliver targeted, on-demand training programs for payroll services. The Head Office departments have jointly provided a total of 19 training sessions to branches at their request. ● We offer a range of learning formats, including in-person training, online-offline blended training, self-directed online learning, job
--	---

	shadowing, and third-party training.
Supporting academic degree programs and certifications	<ul style="list-style-type: none"> ● We encourage and support employees, including dispatched workers, to pursue continuous development outside their day-to-day roles, such as degree programs and professional certifications. In 2025, we assisted 16 employees, including dispatched workers, in enrolling in part-time degree programs, and supported 76 employees, including dispatched workers, in obtaining third-party professional certifications for AML, sanctions compliance, and documentary credit, among others. ● We have formulated the <i>Management Measures for Employee Certification and Accreditation</i>, linking job training, certification assessments (including exams and expert reviews), qualification recognition, performance evaluation, and job promotions.
Offering joint training programs	<ul style="list-style-type: none"> ● We partner with leading national training institutions, such as the Central Party School and the China Executive Leadership Academy Jinggangshan (CELAJ), as well as universities such as Peking University and Zhejiang University, to deliver leadership development programs.



Our Jilin Branch holds the 2025 "Young Talent Camp" training session.

Key Performance Highlights:
As of the end of the reporting period,

Spending on employee training: RMB 235.58 million

Total number of trainees (including online training): 1.08 million

Proportion of male employees trained: 91.88%

Proportion of female employees trained: 93.17%

Proportion of managers trained: 8.18%

Proportion of special talents trained: 9.17%

Proportion of business personnel trained: 62.65%

Proportion of other employees trained: 20.00%

Average employee training hours: 127

Average training hours of male employees: 127.32

Average training hours of female employees: 125.86

Average training hours of Class A employees: 131.07

Average training hours of Class B employees: 119.36

Average training hours of Class C employees: 132.53

Average training hours of Class D employees: 173.72

Average training hours of Class E employees: 137.48

5.1.6.2 Ensuring Smooth Career Pathways

Based on a career development system that offers opportunities for "upward progression, lateral transitions, and cross-functional responsibilities", the Bank has revised the *Management Measures of BoCom for Expert Teams* to further strengthen the development of an expert workforce and enhance its role in motivating professional excellence. This approach encourages highly skilled professionals to advance into expert roles, thereby broadening career pathways for employees. We have also strengthened leadership development by introducing the *Plan of BoCom for Leadership Development of Directly Managed Institutions and Head Office Departments (2024-2028)* and updating the *Management Measures of BoCom for Selection and Appointment of Managers*.

The Bank has established a succession management system for key positions, which is aligned with strategic priorities, tailored to different talent groups, and regularly reviewed. The

Bank has established a Talent Development Steering Group to oversee talent development across all levels. We have also defined clear criteria, development pathways, and appointment processes for succession candidates, using training outcomes as a key criterion in their evaluation. We also prioritize resources for these candidates, including dedicated funding, faculty support, and tailored development programs. We have built a Bank-wide capability development system focused on professional expertise, digital skills, and overall capability building, enabling employees to grow alongside business development. Through multi-level succession planning and Bank-wide capacity-building programs, we support the alignment of employee career development with the Bank's long-term sustainable growth.

5.1.7 Caring for Employees

The Bank integrates employee care into daily operations and has built a comprehensive support system for our people. We aim to create a workplace where employees feel supported in their work and connected through shared growth.

5.1.7.1 Protecting Employees' Health

The Bank complies with applicable laws and regulations, such as the *Work Safety Law of the People's Republic of China* and the *Fire Control Law of the People's Republic of China*, as well as industry safety standards such as the *Security Requirements for Banking Business Area*. We have implemented internal safety policies, such as the *BoCom Security Management Measures*, the *Management Measures of BoCom for Safety and Security at Business Outlets*, and the *Management Measures of BoCom for Fire Safety*. We also provide regular health check-ups to support employees' health and well-being.

Initiatives to protect employee health and safety

Strengthening risk prevention	<ul style="list-style-type: none"> ● We have established a collaborative three-tier fire alarm and monitoring mechanism and optimized fire response procedures at our monitoring centers. ● We continue to improve contingency plans and conduct various security and fire drills. ● We carry out ongoing identification and rectification of safety hazards,
-------------------------------	--

	<p>develop a risk register, and enhance closed-loop management of identified issues.</p> <ul style="list-style-type: none"> ● We enhance disaster preparedness by strengthening emergency supply reserves and improving early warning and response mechanisms.
Providing health support	<ul style="list-style-type: none"> ● We provide mental health training programs, organize mental health knowledge competitions, identify high-risk cases, and offer targeted counseling and support. ● We offer interpretation of health check-up results and provide personalized guidance on health management. ● We conduct mental health assessments for employees and follow up with targeted engagement in business units or lines where more prominent issues are identified. ● We organize special educational sessions on altitude sickness prevention and address concerns raised by employees.
Conducting education and awareness activities	<ul style="list-style-type: none"> ● We organize training sessions and workshops on occupational health and safety management.

Table: Work-related injuries of BoCom employees

Indicator	2025	2024	2023
Work-related fatalities	1	2	3
Work-related fatality rate (%)	0.0011	0.0022	0.0034
Days lost due to work-related injuries	10,091	11,401	9,317.5

Note: Work-related fatality rate = Number of work-related fatalities / Total number of employees at BoCom institutions on the Chinese mainland in 2025

Key Performance Highlights:

As of the end of the reporting period,
employees covered by work-related injury insurance reached 100%.



Our Fujian Branch organizes a training session on employees' mental health.

5.1.7.2 Caring for Employees in Need

The Bank has established an employee mutual support mechanism. We provide assistance through a combination of financial aid, psychological support, and development opportunities, creating a supportive and caring environment for employees. In 2025, nearly 80,000 employees voluntarily participated in these programs, supporting over 500 cases and distributing over RMB 9 million in assistance funds.

Employee support initiatives

Caring for employees in need	<ul style="list-style-type: none"> ● We provide holiday support during New Year's Day and the Spring Festival for employees in need, including single mothers and model workers, as well as employees on temporary assignments. ● We offer care and support for veteran employees.
Caring for female employees	<ul style="list-style-type: none"> ● We renewed the <i>Special Collective Agreement of Bank of Communications Co., Ltd. on the Protection of Female Employees' Rights and Interests</i>. ● We organized "Women's Care Week" and released a themed campaign video. ● We offered lectures on health care and career development, along with activities such as reading sessions and traditional handicraft

	workshops.
--	------------

5.1.7.3 Enhancing Employee Engagement

The Bank advocates a "positive, healthy, free, and happy" lifestyle and organizes diverse cultural and sports activities to help employees achieve a better work-life balance while strengthening team cohesion and a sense of belonging.



5.2 Product and Service Security and Quality

The Bank is building a transparent, fair, and secure financial service environment through a strong governance framework, effective complaint management, and ongoing financial education. We protect the rights and interests of consumers, including their rights to information, the right to make informed choices, and the security of their assets. In 2025, we recorded no major incidents related to product or service safety and quality.

5.2.1 Refining Consumer Protection Mechanisms

The Bank has established an overarching consumer protection framework, where the Board assumes the ultimate responsibility for consumer protection. Under the Board, the Social Responsibility (Environmental, Social, and Governance) and Consumer Protection Committee provides overall planning and guidance on consumer protection. Each year, the committee reviews our consumer protection performance and plans, as well as related annual audit reports. The committee has also provided guidance on the development of the *Management Measures of BoCom for Tiered Authorization on Personal Customer Information* and other policies for personal information protection. Strict procedures and standards are in place for the collection,

storage, access, copying, and use of customer information, ensuring that such information is used or shared externally only with proper authorization.

In 2025, the Bank continued to improve consumer protection mechanisms and systems, integrating consumer protection into the entire process and every aspect of business management. We enhanced our approach to complaint prevention and resolution by strengthening governance at the source and improving management across the entire lifecycle, thereby continuously improving our consumer protection practices. We have established and operated 15 consumer protection mechanisms across the Bank, covering areas such as consumer protection review, personal information protection, and financial education. We formulated or revised eight policy documents, including the *Management Measures of BoCom for Personal Customer Information Protection* and the *Management Measures of BoCom for Financial Consumer Dispute Resolution*. Currently, we have 29 consumer protection policies in effect. We also issued the *Implementation Rules for Consumer Protection Education, Publicity and Training of the BoCom Pacific Credit Card Center*. Guided by the objective of strengthening consumer protection awareness among all employees and reinforcing a people-centered service approach, we have coordinated internal training on consumer protection, ensuring that all employees are trained under the overarching consumer protection framework. In addition, we have delivered tailored training programs in various formats for different employee groups, including mid-level managers, Senior Management, dedicated consumer protection staff, grassroots employees, and new hires, to continuously enhance professional capabilities in consumer protection.

Key Performance Highlights:

As of the end of the reporting period,

Consumer protection reviews conducted: 42,000

Consumer protection training participants: 1,661,200

Employees covered by consumer protection-related training: 100%

5.2.2 Customer Complaint Management

The Board of BoCom strengthens planning and oversight of complaint management, and enhances dispute resolution capabilities by refining complaint handling processes, addressing the

root causes of complaints, and leveraging technology. Specialized functional department at the Head Office oversees end-to-end complaint management, offering guidance, training, inspection, review, and performance evaluation, and coordinates with all entities to properly handle complaints. Each entity is accountable for complaints within its scope of responsibility, and ensures that all customer complaints are promptly accepted, accurately categorized, efficiently routed, and handled in a compliant and timely manner.

The Bank has established an efficient and well-functioning complaint management system that integrates complaint handling, analysis, escalation, review, accountability, root-cause analysis and remediation, diversified dispute resolution, and emergency response. We address both immediate issues and underlying causes to ensure effective resolution across all channels, business lines, and processes. Drawing on best practices in community-based dispute resolution, such as the "Fengqiao Experience", we promote diversified approaches to resolving complaints and continuously enhance our complaint management system through digital technologies. We continue to streamline customer feedback processes, maintain transparent and accessible online and offline channels for receiving customer feedback, and respond promptly to various customer concerns. By implementing a fast-track mechanism for handling customer complaints across the Bank, we have significantly shortened resolution timelines, reduced unnecessary handoffs, and improved overall efficiency.

交通银行投诉处理流程及投诉受理渠道

Bank of Communications Procedure and Channel of Customer Complaint



BoCom customer complaint handling procedures, complaint intake channels, and complaint handling supervision process

Table: Customer complaints statistics

Indicator	2025
Number of consumer complaints	317,600 (After eliminating the duplicated cases)
Complaint intake availability	7×24

Note: The types of financial consumer complaints mainly include credit card business (132,000 complaints, accounting for 41.6%), personal loan business (86,100 complaints, accounting for 27.1%), debit card business (65,800 complaints, accounting for 20.7%), and other businesses (33,700 complaints, accounting for 10.6%). These complaints are distributed across regions such as Shenzhen (3.4%), Guangdong Province (3.1%), Henan Province (2.2%), Jiangsu Province (2.2%), Hubei Province (2.1%), Beijing (2.0%), Shanghai (1.9%), Shandong Province (1.6%), Hunan Province (1.5%), and Anhui Province (1.3%). Complaints related to credit cards and

certain other business types are centrally handled by the head office, so the regional distribution percentages only reflect complaints attributed to branch offices.

5.2.3 Review of Products and Service

The Bank strengthens Board oversight of investment decisions, with a focus on reviewing key matters and products. We have established the BoCom Product Innovation Management Committee to oversee product innovation and manage risks associated with new products and services across the Bank. In accordance with the *Management Measures of BoCom for Product Innovation*, a product lifecycle management system based on product catalogues has been established, covering product approval, changes, launch, post-launch evaluation, and exit. In addition, in accordance with the *Management Measures of BoCom for Risk Assessment of New Products and Services*, we have standardized the procedures, methods, and tools for risk assessment of new products and services to identify potential risks and develop targeted mitigation measures.

The Bank reviews new products and services across four stages: creative design, assessment and approval, R&D and launch, as well as operation and exit.

Review process for new financial products or services

Creative design	<ul style="list-style-type: none"> ● Assess market conditions and customer needs, develop product proposals, and evaluate business feasibility, necessity, cost–benefit, and technical feasibility. Initiate the product approval process upon completion.
Product approval	<ul style="list-style-type: none"> ● Conduct risk assessments for new products and submit approval applications based on product classification to the relevant authorities. ● Service plans are approved and filed by the product operation and management function. Branch-specific products are subject to approval by the Head Office. Products offered by subsidiaries should be registered and filed for record.

R&D and launch	<ul style="list-style-type: none"> ● The R&D function is responsible for product research, development, testing, and launch, including model development where applicable. ● The product operation and management function formulates promotion plans, establishes relevant policies, and organizes training. ● Where products involve market risks, they are subject to regulatory approval procedures and compliance reviews prior to launch.
Operation and exit	<ul style="list-style-type: none"> ● The product operation and management function oversees ongoing operations and conducts exit assessments for products and services based on actual performance.

5.2.4 Loan Restructuring

The Bank integrates consumer protection into loan processes. We continuously monitor borrowers' performance and promptly identify changes in their risk profiles. For customers facing financial difficulties, we offer tailored relief measures within the scope of permissible adjustments, taking into account the customer's current risk profile as well as willingness and ability to pay. These arrangements are made through mutual agreement and are designed to help customers navigate financial challenges while keeping risks under control.

Key measures of loan restructuring

Identifying loan terms eligible for adjustment	We assess customer needs and financial conditions based on ongoing communication. For customers facing temporary repayment difficulties but demonstrating a willingness to repay, we provide appropriate relief measures. Subject to mutual agreement, we may adjust loan terms, including the loan tenor and repayment arrangements.
Channels for accessing information on restructuring options and submitting applications	Customers with a loan restructuring request may consult their account manager or call the 95559 customer service hotline. Applications can be submitted at our outlets.

5.2.5 Debt Collection Management

The Bank has established a dedicated task force to strengthen collection management. It has reviewed existing practices and processes and identified operational challenges across branches. Based on this, it has clarified key requirements of loans approaching maturity and for collection management. An operations manual for retail credit collection has been formulated.

Key measures to strengthen debt collection management

<p>Clarifying collection procedures</p>	<ul style="list-style-type: none"> ● We follow the collection standards issued by the China Banking Association, with clear controls over collection timing and frequency, confidentiality requirements, and lawful access to customer information. Collection activities such as phone calls, written notices, and on-site visits are conducted in a standardized manner. Prohibited practices are clearly defined to protect the legitimate rights and interests of debtors. ● For SME lending, we apply principles of compliance, due diligence, accurate record-keeping, and privacy protection. We issue timely reminders for overdue accounts and guide debtors to perform their repayment obligations, with clear boundaries on prohibited collection practices.
<p>Improving collection system functions</p>	<ul style="list-style-type: none"> ● We have introduced AI-enabled collection tools and expanded SMS templates. ● We use risk scoring models to precisely segment customers and apply AI tools for real-time quality monitoring, call guidance, and collection case review. ● We incorporate external data sources to help re-establish contact with customers who are temporarily unreachable.
<p>Refining relief measures</p>	<ul style="list-style-type: none"> ● We strengthen the management of loans approaching maturity. For non-defaulting borrowers of "Huimin Credit", we provide a manual channel for restructuring discussions and case initiation.

	<ul style="list-style-type: none"> ● When customers request negotiation during the collection process, we offer restructuring solutions within policy guidelines to alleviate their repayment pressure.
Offering targeted training	<ul style="list-style-type: none"> ● We deliver training for inclusive finance credit risk personnel to communicate collection policies and reinforce compliant collection practices. ● We provide both online and in-person training on relief policies and system operations for senior managers, risk managers, credit approvers, and account managers in retail lending. We also conduct specialized collection training for branch-level risk managers and collection staff in retail lending, focusing on system use and negotiation skills.

5.2.6 Financial Literacy Programs

The Bank strengthens consumer protection by providing training at all levels to build employees' awareness and capabilities. We have carried out public education initiatives, including campaigns around World Consumer Rights Day (March 15), to raise public awareness of financial risks and protect consumers from illegal financial activities and potential financial losses.

Initiatives to enhance financial literacy

Innovating digital financial education models	<ul style="list-style-type: none"> ● We organized the "Consumer Protection Knowledge Challenge" to engage the public through interactive quizzes and improve their awareness of financial risks. ● We launched an online "Financial Education Center" where our digital ambassador "Jiaojiao" interacts with users through Q&A on financial topics. ● The 3D "Jiaojiao" brand character was upgraded to support our corporate culture for consumer protection.
---	---

<p>Incorporating financial education into everyday scenarios</p>	<ul style="list-style-type: none"> ● We rolled out the "Jiaojiao Talks on Consumer Protection" campaign, integrating financial education into real-life scenarios such as cultural tourism and everyday consumption. ● We launched the "financial education + cultural tourism" campaign by organizing outreach activities at major tourist attractions, and delivering educational content through outdoor screens or transit billboards.
<p>Carrying out education programs targeting key groups</p>	<ul style="list-style-type: none"> ● We have enhanced financial education for key groups, including the elderly, young people, new urban residents, migrant and rural workers, people with disabilities, and foreign nationals in China. Our initiatives bring financial knowledge into schools, communities, and public venues such as tourist destinations. ● For the elderly, our Suzhou Branch used real-life cases, such as "high-yield wealth management products" and "fraudulent health product scams", to help older customers recognize common fraud tactics. ● For young people, our Qingdao Branch launched the "Little Financiers" program, reaching students across primary, secondary, and tertiary education institutions. ● For people with disabilities, our Shaanxi Branch provided guidance on financial fraud prevention, personal financial planning tailored to individual needs, and the use of financial tools to improve quality of life. ● For new urban residents, our Shenzhen Branch launched an AML awareness campaign targeting new residents in the city.
<p>Partnering with financial education</p>	<ul style="list-style-type: none"> ● During the "Financial Education and Awareness Week", all branches organized educational activities on university campuses. For example, our Heilongjiang Branch visited Northeast Forestry University, giving

organizations	the freshmen their first lesson on financial security. Our Suzhou Branch collaborated with Soochow University to host interactive financial literacy activities.
---------------	--

Key Performance Highlights:

As of the end of the reporting period,

We conducted financial education activities, both online and offline, reaching a total of 1,490 million consumers.

Honors and Awards:

The short video "Financial Rights and Interests in Sign Language" was recognized as the "Most Popular Financial Education Work of the Year" by the National Financial Regulatory Administration.

- **Community Outreach**



Our Hainan Branch organizes a community-based financial literacy event that attracts international participants.



Our Suzhou Branch partners with a community-based financial service center to deliver "Silver Age Classroom", helping enhance financial safety awareness among elderly residents.

- **Campus Outreach**



Our Xiamen Branch delivers a financial literacy program at Tan Kah Kee College, Xiamen University.

- **Rural Outreach**



Our Guangdong Branch conducts financial education activities in designated assistance villages, raising awareness of telecom and online fraud prevention.

- **Transport Hub Outreach**



Our Shaanxi Branch carries out financial literacy activities at major transport hubs.

- **Tourist Attraction Outreach**



Our Yunnan Branch organizes financial literacy campaigns at tourist attractions.

- **Nursing Home Outreach**



Our Xizang Branch delivers financial education sessions at the Lhasa Welfare Institute for local residents.

5.2.7 Promoting Fair Marketing

The Bank strictly adheres to applicable laws and regulations, including the *Advertising Law of the People's Republic of China* and the *Trademark Law of the People's Republic of China*. We enforce internal policies such as the *Management Measures of BoCom for Advertising and Publicity*, the *Management Measures of BoCom for Consumer Protection*, the *Management Measures of BoCom for Group Brand Architecture*, the *BoCom Trademark Management Measures*, the *Measures of BoCom for Intellectual Property Management*, the *Management Measures of BoCom for Visual Identity System Standards* and the *BoCom Corporate Identity Management Handbook*. Under this framework, pertinent departments review advertising materials for compliance, provide regular training for employees, strengthen the integrated management of the Group's brands and trademarks, and standardize internal processes. We have also established clear protocols for handling disputes and risk events related to advertising, trademarks, and other marketing activities. Where disputes or legal claims arise from advertisements or related materials, the entity providing the content or materials is held liable. Any acts that seriously infringe upon consumers' rights and interests or violate regulations on trademark or other intellectual property rights are subject to penalties under the Bank's policies, and may be escalated to disciplinary inspection and supervision authorities. As of the end of the reporting period, we recorded no violations related to advertising, trademarks, product and service information and labeling, or marketing communications.

The Bank requires that credit card marketing materials, including campaign rules and promotional content, undergo countersignature review and consumer protection checks prior to their release, in accordance with the *Management Measures of BoCom Pacific Credit Card Center for Marketing Activities* and the *Implementation Rules of BoCom Pacific Credit Card Center for Consumer Protection*. We ensure that customers are provided with clear and complete information about marketing activities.

5.2.8 Caring for Female Customers

The Bank supports female customers through a range of financial solutions and lifestyle services. We provide support across different aspects of their lives, from wealth management to everyday consumption, helping them pursue a more fulfilling and high-quality lifestyle.

Initiatives for supporting female customers

- We have integrated the "Bestie" sharing feature into card benefits, offering triple reward points on designated days for shared spending.
- We build on the lifestyle positioning of the Bestie Card by introducing themed offerings inspired by Chinese traditional culture, trendy toys, and other interest-based IPs to meet the diverse cultural preferences of female customers and enhance their overall experience.
- We offer exclusive promotions to female shoppers under our "Most Popular Friday" program and provide preferential installment plans for large purchases.

5.3 Data Security and Customer Privacy Protection

The Bank has established and improved a comprehensive data security governance system. We strengthen data protection through enhanced policies and standards, robust technical safeguards, and privacy-by-design practices, so as to protect data security and reliability as well as customer privacy in all interactions.

5.3.1 Governance

The Bank has built a robust data security governance structure that brings together the Board, Senior Management, and data security administration departments and technology departments. We follow a clear accountability principle under which business units are responsible for the data they handle, including its security. Based on this approach, we define and implement data security responsibilities across the three lines of defense. Each year, the Board reviews regular reports from the Senior Management on data governance and data security risk assessments, and provides oversight on key areas such as data standardization. Through the Digital Finance Committee, the Senior Management oversees the implementation of data security initiatives, ensures adequate resource allocation, and approves, coordinates, and makes decisions on major matters regarding

data security. Across the Bank, different units work together to build the data security system and ensure that both management and technical controls are effectively implemented.

The Bank has developed a comprehensive data security policy system, with the *Data Security Measures* as its foundation. This system covers data classification and grading, impact assessments, outbound data transfers, and emergency response protocols. These policies apply across all business lines. In 2025, we revised the *Management Measures of BoCom for Data Security*, the *Management Measures of BoCom for Outbound Data Transfer*, and the *Management Measures of BoCom for Data Security Emergencies*, to further enhance our data security management. The Bank continues to improve customer information protection policies and procedures, including updates to the *Management Measures of BoCom for Personal Customer Information Protection*. Through stronger internal controls and practices, such as minimizing data collection and retention, we have effectively protected customer information and privacy.

5.3.2 Strategy

The Bank's data security strategy is guided by the principle of balancing development and security. We have established a comprehensive data security framework that ensures full coverage of data security management work and strengthens data classification and tiered protection with differentiated controls. We also strengthen cross-functional collaboration on data security and continuously improve our management processes, protection mechanisms, and supporting tools.

5.3.3 Management of Impacts, Risks, and Opportunities

The Bank has established an ongoing, end-to-end framework for data security assessment and risk management. We have developed and implemented pre-assessment mechanisms to identify and mitigate potential security and compliance risks at an early stage. We conduct regular data security risk assessments and perform annual comprehensive reviews of data asset security, the effectiveness of control measures, and changes in the external threat landscape. Based on these assessments, we optimize our data security management framework and strengthen risk defenses.

5.3.4 Indicators and Targets

The Bank has defined targets of data security management and implemented the laws, regulations, and regulatory requirements for data security. We have in place a data security

governance system aligned with our business development goals, so as to safeguard broader national security, political security, economic and financial security and public interests, and protect the legitimate rights and interests of organizations and individuals. We strengthen security controls across the data lifecycle and different application scenarios, and promote the compliant use and sharing of data. We have also established a robust personal information protection framework to safeguard individuals' rights and ensure that personal customer data is handled in a safe, lawful, and compliant manner. As of the end of the reporting period, we recorded no data security incidents, customer privacy breaches, substantiated complaints involving customer privacy violations or data loss, or confirmed incidents of leakage, theft, or loss of customer information.

5.3.5 Improving Data Security Management

The Bank continues to strengthen our data security management framework. We enhance end-to-end data protection through ongoing security monitoring, targeted security capability training, clear data accountability for partners, and enhanced emergency response mechanisms. In terms of information security certifications, we have achieved a level-5 certification under the Data Management Capability Maturity Assessment Model (DCMM) which covers core data security capabilities. We are the third commercial bank in China to attain this highest-level certification.

Initiatives for data security management

<p>Conducting security audits</p>	<ul style="list-style-type: none"> ● Every three years, we conduct dedicated audits on data security and network information security, while incorporating information security assessments into other audits. In 2025, we completed 24 IT audits. ● A third-party accounting firm is engaged to conduct an external security audit of information systems every six months, covering all operating entities and the main information systems of the Bank. The audit includes but is not limited to system development, operations, and maintenance. ● We carry out filing and assessment for tiered cybersecurity protection of
-----------------------------------	---

	relevant information systems.
Offering targeted training	<ul style="list-style-type: none"> ● We provide training for all employees to enhance data security awareness and management capabilities, and incorporate data security requirements into the training courses for outsourced IT personnel.
Enhancing partner management	<ul style="list-style-type: none"> ● We define clear access control requirements for outsourced IT personnel under our IT outsourcing policy, upholding the principles of "need-to-know" and "least privilege". ● We strengthen oversight of data cooperation with third parties, ensuring all such activities comply with applicable laws and regulations. We also adopt technical safeguards to protect data security. ● We enhance our management mechanism for outbound data transfer, conducting data security assessments and reviews of outbound data activities. We ensure that all data processing activities remain compliant, require ongoing risk monitoring for external data sharing, and regularly review partners' adherence to our data security requirements. ● We also review data security arrangements for outsourcing activities, and conduct on-site compliance checks of external partners.
Managing data breaches	<ul style="list-style-type: none"> ● We comply with regulatory requirements on data classification by establishing and maintaining a robust data classification framework, including the classification and security grading of system data. ● We conduct ongoing data security monitoring, inspections, and emergency response drills. ● We have established a response framework for data security incidents, requiring timely reporting based on incident severity and the prompt activation of response measures to effectively contain and mitigate potential impacts.

Key Performance Highlights:

As of the end of the reporting period,
 Three meetings of the Data Governance (Financial Statistics Standardization) Committee were held.

5.3.6 Enhancing Customer Privacy Protection

The Bank continues to strengthen the customer privacy governance framework. We have established end-to-end controls for personal data protection by reinforcing internal policies and procedures, applying data minimization principles, and safeguarding customers' rights over their personal information.

Key initiatives for enhancing customer privacy protection

Standardizing internal management	<ul style="list-style-type: none"> ● We maintain strict procedures and standards, with tightly controlled access to sensitive information based on role and responsibility. We also implement data classification and access control mechanisms. ● We incorporate customer data protection into performance assessments based on defined compliance criteria. ● We conduct regular on-site compliance reviews and data protection checks in personal banking, and carry out emergency drills for personal customer information security incidents.
Minimizing data collection and retention	<ul style="list-style-type: none"> ● In terms of data collection, we define the purpose, methods, scope, and retention period in line with the principle of data minimization. ● Access to and use of personal data are governed by business needs and least-privilege principles, with permissions assigned based on roles. The use of sensitive personal information requires appropriate authorization and is strictly limited in scope. ● Personal information is retained in accordance with relevant national and industry regulations as well as agreements with our customers. Once the retention period expires, the information will be deleted or anonymized. ● We handle personal data exchanges with third parties in strict

	<p>accordance with applicable laws and regulatory requirements. Where personal data is obtained from external sources, we ensure that proper consent has been obtained, unless otherwise prescribed by law.</p>
<p>Protecting customers' rights over personal information</p>	<ul style="list-style-type: none"> ● We provide multiple channels, including physical outlets, mobile banking, and customer service hotlines, through which customers can access, obtain copies of, correct, supplement, or delete their personal information, as well as withdraw their consent. ● We inform customers of our data processing practices through privacy policies and consent forms, setting out how their personal information is used, their rights in relation to such information, and how those rights can be exercised.
<p>Carrying out third-party privacy and data security management</p>	<ul style="list-style-type: none"> ● We prohibit unauthorized access to, misuse of, or disclosure of customer information, as well as the sale of personal data to any external organization or individual. ● Where personal information is shared with external parties in the course of business cooperation, we conduct data security impact assessments. ● We clearly define in cooperation agreements the purpose, method, and scope of personal information exchange and the way to obtain customer consent. In the course of cooperation, one or both parties are required to fulfill consent and notification obligations before collecting and processing information. ● We ensure, through contractual controls, ongoing monitoring, and accountability for breaches, that customers' personal data will not be used for unauthorized purposes. Upon completion of cooperation, we require partners to delete the information or continue observing the confidentiality obligation as agreed.

Offering privacy protection training	<ul style="list-style-type: none"> ● We provide training on personal information protection, which covers 38 provincial or directly-managed branches and major business units at the Head Office.
Executing access control and personal or sensitive data protection	<ul style="list-style-type: none"> ● We enhance security protection throughout the data lifecycle by employing technologies such as data encryption, security authentication, access control, and data anonymization.

Key Performance Highlights:

As of the end of the reporting period,

100% of employees received privacy and data security training.

5.4 Supply Chain Security

The Bank has established a comprehensive supply chain management mechanism. We enhance the resilience and sustainability of our supply chains through strict supplier admission assessments, lifecycle risk monitoring, and green and digital transformation.

Key Performance Highlights:

As of the end of the reporting period,

Our Head Office had 50,489 registered suppliers. Their distribution by region is as follows:

Bohai Rim: 9,354

Yangtze River Delta: 12,282

Pearl River Delta: 6,880

Central China: 8,646

Western China: 9,195

Northeast China: 4,106

Outside the Chinese mainland: 26

Proportion of suppliers who have received training from the Bank: 100%

5.4.1 Procurement activities conducted in compliance with the Bank's procurement policies: 100%Strengthening Supply Chain Risk Management

The Bank has formulated the *Management Measures of BoCom for Centralized Procurement*, the *Management Measures of BoCom for Decentralized Procurement* and the *BoCom Supplier Management Measures*. We strengthen supply chain risk management through a clearly defined governance structure, end-to-end risk control measures, and the use of technology to enhance risk management capabilities.

Key initiatives to strengthen supply chain risk management

<p>Improving the risk management system</p>	<ul style="list-style-type: none"> ● We have established the Centralized Procurement Management Committee as the decision-making body for centralized procurement. A dedicated centralized procurement department oversees supplier sourcing, misconduct handling, and contract performance monitoring. A tiered approval mechanism has been implemented to support effective and well-informed decision-making. ● We address supplier misconduct in accordance with applicable laws and regulations. Where similar issues arise at the same points in the supply chain across multiple branches, we take coordinated action at the Head Office level to address and control such risks.
<p>Implementing end-to-end risk control</p>	<ul style="list-style-type: none"> ● We have established review requirements and developed a template for procurement requests. ● For centralized procurement projects, we give priority to open bidding and "public solicitation + non-bidding" methods, and strictly follow pre-disclosure and post-award announcement procedures. ● We enhance oversight of supplier submissions to detect fraud, bid rigging, and collusion. ● We also incorporate environmental and social criteria into supplier evaluation and require that suppliers are not included in the list of dishonest judgment debtors published at the "Credit China" website or any other regulatory watchlists.

	<ul style="list-style-type: none"> ● We combine targeted inspections with ongoing compliance monitoring and conduct end-to-end oversight throughout the procurement process.
Enhancing risk management capabilities	<ul style="list-style-type: none"> ● We strengthen risk management through the use of digital tools, including smart procurement platforms, electronic bidding systems, and procurement risk early-warning models. ● We regularly review and compile typical cases of procurement violations to strengthen awareness and reinforce compliance.

5.4.2 Ensuring Supply Chain Security and Stability

The Bank ensures the security, stability and sustainability of supply chains by implementing green and sustainable procurement, protecting the legitimate rights and interests of suppliers, and strengthening team building.

Key initiatives to ensure the security and stability of supply chains

Carrying out green procurement	<ul style="list-style-type: none"> ● We integrate environmental sustainability into procurement policies and procedures, and prioritize energy-efficient and environmentally friendly products. Environmental performance is included as a key criterion in the technical evaluation of proposed equipment to promote green and low-carbon practices among our suppliers. ● We promote smart procurement platforms and malls, having established an electronic bidding sub-system and implemented measures such as online contract execution to enhance the quality and efficiency of green procurement.
Protecting the legitimate rights and interests of suppliers	<ul style="list-style-type: none"> ● We have put in place a formal mechanism for handling queries and complaints related to centralized procurement, in accordance with the <i>Measures of BoCom for Handling Concerns and Complaints about Centralized Procurement</i>. ● We safeguard the corporate and personal information of suppliers by strengthening training and education and signing confidentiality agreements.

	<ul style="list-style-type: none"> ● We enter into contracts with suppliers based on the principles of integrity and good faith, and ensure timely payment in accordance with contractual terms. ● In managing suppliers, we follow principles of open and inclusive access combined with rigorous performance management, as well as fairness, integrity, and mutual benefit. We track the performance of suppliers, monitoring whether they are listed on any regulatory watchlists, such as the list of dishonest judgment debtors.
<p>Enhancing the professional competence of procurement personnel</p>	<ul style="list-style-type: none"> ● We have developed the "Procurement Knowledge Hub" program to improve employees' understanding of procurement principles and rules through policy briefings, scenario-based learning, and practical Q&A sessions. ● We regularly provide general training on centralized procurement and professional certification programs to enhance procurement capabilities. ● We enhance knowledge exchange with financial peers and hold internal seminars focused on key challenges in procurement operations.

5.5 Fair treatment of SMEs

The Bank complies with applicable national laws and regulations, including the Law of the People's Republic of China on the Promotion of Small and Medium-Sized Enterprises, the Regulations on Ensuring Payments to Small and Medium-Sized Enterprises, and the Law of the People's Republic of China on Tenders and Bids, as well as the Bank's internal procurement policies and procedures. We ensure fair treatment of all suppliers and provide SMEs with equal access to procurement opportunities. We do not impose entry thresholds based on registered capital or business size, and strictly prohibit any requirements that could restrict competition in procurement. We honor our contractual obligations and make payments in strict accordance with the agreed contract terms.

5.6 Ethics of Science and Technology

Upholding the principles of "technology for good and data as a driver of equality", the Bank strictly adheres to the *Guidelines for Science and Technology Ethics in Financial Sector*, and has established internal policies, including the *Interim Measures of BoCom for Model Risk Management* and the *Management Measures of BoCom for Data Security*. We have incorporated technology ethics into the *Fintech Development Plan of BoCom for the 14th Five-Year Plan Period (2021-2025)*, requiring effective governance of Fintech ethics to mitigate potential ethical risks arising from innovation. In addition, under the "AI+" *Action Plan*, we have required efforts to improve technology ethics, guard against risks arising from new technologies, and establish an effective governance system for AI. During the reporting period, we recorded no violations of technology ethics.

During the National Science and Technology Week, the Bank engaged the public through our branch network and WeChat official account. We communicated regulatory priorities, promoted public understanding of Fintech and technology ethics, and improved overall Fintech literacy. These efforts support the development of a secure, innovative, and inclusive Fintech ecosystem.

5.7 Social Contributions

The Bank complies with the *Management Measures of BoCom for External Donations* and remains committed to "finance for good". We continue to develop our "Blue Balloon" charity brand and actively support social initiatives, with a focus on rural revitalization, education, assistance for people with disabilities, and disaster rescue and relief. By leveraging our financial expertise, we contribute to shaping a more equitable, inclusive, and resilient society.

Key Performance Highlights:

As of the end of the reporting period,

Charitable donations: RMB 64,732,600

Number of public welfare projects: 216

Number of volunteer participations: 260,547

Employee volunteer service hours: 390,821

● **Assistance for People with Disabilities**

Key Performance Highlights:

As of the end of the reporting period, we had supported disability inclusion initiatives for 18 consecutive years, with cumulative charitable donations of RMB 120 million.

We provided financial assistance to more than 37,300 students with disabilities from low-income backgrounds, improved conditions in 126 special education schools, and trained 9,431 special education teachers. In addition, we recognized 1,799 outstanding special education teachers and 565 outstanding college students with disabilities. These efforts benefited over 240,000 people with disabilities and professionals working in the disability sector.

We sponsored 6 national-level vocational skills competitions for persons with disabilities, enabling over 5,000 workers with disabilities to grow and achieve success through competitions and helping 69 high-skilled workers with disabilities win the title of "National Technical Experts".

For the third consecutive year, we provided funding for the "Beautiful Crafts Workshop" program, helping 190,000 women with disabilities get employed and increase their income.

Honors and Awards:

The Bank was awarded the "National Advanced Unit for Work on Persons with Disabilities" by the State Council Working Committee on Disability, the Ministry of Human Resources and Social Security, and the China Disabled Persons' Federation.

The original charity song "As Beautiful as She Is" won a Gold Award for Interactive Creativity at the 2025 Modern Advertising Awards.



<p>17 exclusive financial services launched to support the National Games for Persons with Disabilities & National Special Olympic Games</p>	<p>Support for the 9th National Vocational Skills Competition for Persons with Disabilities</p>
 <p>Support for the "My Dream" show by the China Disabled People's Performing Art Troupe</p>	 <p>Funding for the "Beautiful Crafts Workshop" skills training program for women with disabilities</p>

● **Cultural and Educational Support**

 <p>Our Guizhou Branch launches the "Financial Aid for Dreams" student loan program.</p>	 <p>Our Macao Branch holds the annual "Bank of Communications" Cup Children's Painting Contest.</p>
--	---

● **Exhibition and Convention Support**

	
---	--

BoCom's young volunteers in blue suits serve CIIE, the China Import and Export Fair, the China International Consumer Products Expo, and other national exhibitions and conventions.

- **Support for Sports Events**



Our Xizang Branch provides professional services for the 2025 Lhasa Half Marathon.

- **Caring for Special Groups**



Our Shenzhen Branch holds the "Dream 52Hz" concert, inviting audiences into the musical world of special children.



Our Sichuan Branch organizes the charity trust donation ceremony for "Children Under the Starry Sky in Chengdu".

- **Health Care**



BOCOM International Trust co-hosts the "Bring Together Love, Pass on Hope—Rui-Ye Care Fund Donation Ceremony", contributing trust funds into the "Guangju Shan'ai (Charity) Fund" of Ruijin Hospital and establishing the "Rui-Ye Care Fund" to offer medical assistance for women with cancer and health assistance for children from low-income families.

- **Serving International Cultural Exchanges**



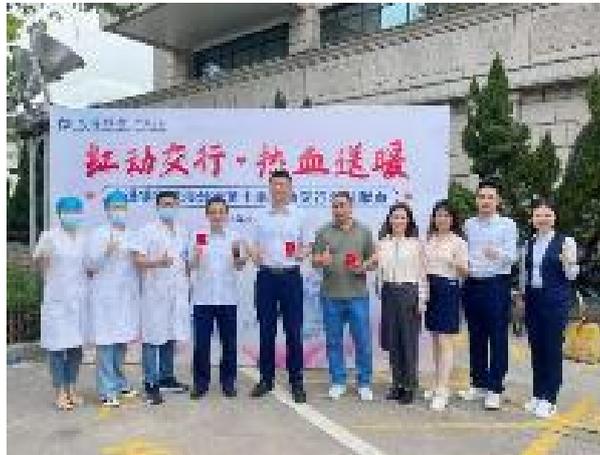
Our Singapore Branch supports the Singapore tour of the dance drama "The Journey of a Legendary Landscape Painting" by the Oriental Performing Arts Group, in celebration of the 35th anniversary of the establishment of diplomatic relations between China and Singapore, helping build a bridge for cultural exchanges between the two countries.

- **Ecological Conservation**



Our Wuxi Branch organizes a public tree-planting campaign themed "Planting Greenery, Enjoying the Scenery of Hudai".

- **Blood Donation**



Our Guangdong Branch organizes the "BoCom in Action, Donating Blood to Share Love" voluntary blood donation event.

- **Unleashing the Potential of Young People**



BOCOM Insurance participates in the "Security Bureau Youth Uniformed Group Leaders Forum Training Program 2024-2025", contributing to the cultivation of young leaders.

- **Enhancing Rule of Law Awareness at the Grassroots Level**



BOCOM Fintech participates in the "Autumn of Law Season" legal awareness campaign, contributing to enhancing the legal literacy of the grassroots and building a society under the rule of law.

Independent Assurance Statement



KPMG Huazhen LLP
8th Floor, KPMG Tower
Oriental Plaza
1 East Chang An Avenue
Beijing 100738
China
Telephone +86 (10) 8508 5000
Fax +86 (10) 8518 5111
Internet kpmg.com/cn

毕马威华振会计师事务所
(特殊普通合伙)
中国北京
东长安街1号
东方广场毕马威大楼8层
邮政编码:100738
电话 +86 (10) 8508 5000
传真 +86 (10) 8518 5111
网址 kpmg.com/cn

有限保证的注册会计师独立鉴证报告

毕马威华振通字第 2600157 号

致交通银行股份有限公司董事会

关于交通银行股份有限公司《2025 年度可持续发展报告》(以下简称“《可持续发展报告》”)中选定信息的报告

一、结论

我们对交通银行股份有限公司(以下简称“交通银行”)的《可持续发展报告》中选定的 2025 年度关键数据(即《可持续发展报告》第 6-7 页关键绩效,以下简称“鉴证的关键数据”)执行了有限保证的鉴证业务。

基于已实施的程序及获取的证据,我们没有注意到任何事项使我们相信交通银行《可持续发展报告》的鉴证的关键数据未能在所有重大方面按照本报告附录:关键数据编制基础(以下简称“编制基础”)所列标准编制。我们对鉴证的关键数据形成的结论不涵盖随附或包含在鉴证关键数据及本报告中的其他信息(以下简称“其他信息”)。其他信息不作为本次鉴证业务的一部分,我们没有对其他信息执行任何程序。

二、形成结论的基础

我们按照国际审计与鉴证准则理事会 (IAASB) 发布的《国际鉴证业务准则第 3000 号(修订版)——历史财务信息审计或审阅以外的鉴证业务》的规定执行了鉴证工作。本报告的“注册会计师的责任”部分进一步阐述了我们在这些准则下的责任。

我们遵守了国际会计师职业道德准则理事会 (IESBA) 发布的《国际会计师职业道德守则(包括国际独立性准则)》中的独立性和其他职业道德的要求。该职业道德守则以诚信、客观、专业性任能力及应有的关注、保密和良好的职业行为为基本原则。



毕马威

有限保证的注册会计师独立鉴证报告 (续)

二、形成结论的基础 (续)

本所运用 IAASB 发布的《国际质量管理准则第 1 号 (ISQM 1) ——会计师事务所对执行财务报表审计或审阅、其他鉴证或相关服务业务实施的质量管理》。该准则要求会计师事务所设计、实施和运行质量管理体系,包括与遵守职业道德要求、执业准则和适用的法律法规要求相关的政策和程序。

我们相信,我们获取的证据是充分、适当的,为形成结论提供了基础。

三、使用限制

本报告仅供董事会使用。除此之外,本报告不可用作其他目的。我们对任何其他人士使用本报告产生的一切后果概不承担任何责任或义务。本段内容不影响已形成的结论。

四、对鉴证的关键数据的责任

交通银行的管理层负责:

- 设计、执行和维护与编制鉴证的关键数据有关的内部控制,以使鉴证的关键数据不存在由于舞弊或错误导致的重大错报;
- 选择或制定用于编制鉴证的关键数据的适当标准,并适当地提及或描述所使用的标准;和
- 按照编制基础编制鉴证的关键数据。

五、编制关键数据的固有限制

我们提请使用者注意,针对非财务数据,尚无公认的评估和计量标准体系,因此存在不统一的计量方法,这将会影响公司间数据的可比性。

六、注册会计师的责任

我们负责:

- 计划和实施鉴证工作,以对鉴证的关键数据是否不存在由于舞弊或错误导致的重大错报获取有限保证;
- 基于我们已实施的程序及获取的证据形成独立结论;及
- 向交通银行董事会报告我们的结论。



有限保证的注册会计师独立鉴证报告 (续)

六、注册会计师的责任 (续)

我们已执行工作的概述，以作为形成结论的基础

在执行鉴证工作的过程中，我们运用了职业判断，并保持了职业怀疑。我们设计并实施了相关程序，以对鉴证的关键数据获取充分、适当的证据，作为形成结论的基础。选择的鉴证程序取决于我们对鉴证的关键数据和其他业务情况的了解，以及我们对能出现重大错报的领域的考虑。在实施鉴证工作时，我们实施的程序主要包括：

- 1) 对交通银行参与提供《可持续发展报告》关键数据的相关部门进行访谈；
- 2) 对《可持续发展报告》关键数据实施分析程序；
- 3) 对《可持续发展报告》关键数据选择样本进行检查；
- 4) 重新计算。

有限保证鉴证业务所实施程序的性质和时间较合理保证鉴证业务有所不同，且范围较小。因此，有限保证鉴证业务的保证程度低于合理保证鉴证业务。

毕马威华振会计师事务所 (特殊普通合伙)

毕马威华振会计师事务所 (特殊普通合伙)

中国 北京

日期：2026 年 3 月 27 日

Foundations for Key Performance Data Compilation

1. "Controlled non-bank subsidiaries" refers to eight non-bank subsidiaries, i.e., Bank of Communications Financial Leasing Co., Ltd., China BoCom Insurance Co., Ltd., BoCom Financial Asset Investment Co., Ltd., Bank of Communications Schroder Fund Management Co., Ltd., Bank of Communications International trust Co., Ltd., BoCommLife Insurance Co., Ltd. and BoCom International Holdings Company Limited, plus BoCom Wealth Management Co., Ltd. The figures on profits from controlled subsidiaries indicate profits attributable to the parent company.

2. Branches outside Chinese Mainland refers to the 24 overseas branches/subsidiaries and representative offices established globally, including Hong Kong Branch/Bank of Communications (Hong Kong) Co., Ltd., branches in New York, Tokyo, Singapore, Seoul, Frankfurt, Macao, Ho Chi Minh City, San Francisco, Sydney, Taipei, London, Bank of Communications (Luxembourg) Limited/Luxembourg Branch, Brisbane Branch, Bank of Communications (Luxembourg) S.A. Paris Branch, Bank of Communications (Luxembourg) S.A. Rome Branch, Bank of Communications (Brazil) Co., Ltd., Melbourne, Prague Branch, Johannesburg Branch, Dubai International Financial Center (DIFC) Branch and the Toronto Representative Office.

3. Outstanding loans, micro-, small- and medium-sized enterprises is the sum of outstanding loans to small- and micro-enterprises and those to mid-sized enterprises as reported to the People's Bank of China.

4. Outstanding loans, agro-related refers to the sum of outstanding agro-related loans reported to the People's Bank of China, including agro-related loans to enterprises and organizations in cities, farm loans, loans to enterprises and organizations in rural areas, and non-farm loans concerning agriculture, forestry, animal husbandry, and fisheries.

5. The data on outstanding science, education, culture, and health loans were obtained based on the 2011 classification of sectors in the national economy, including "scientific research and technology services," "education," "health and social work," and "culture, sports and entertainment."

6.Number of outlets in the Chinese mainland refers to the number of all licensed outlets of BoCom in the Chinese mainland.

7.Outstanding green loans refer to loans issued by financial institutions, in accordance with the reporting standards of the People's Bank of China, to support economic activities aimed at environmental improvement, climate change response, and resource conservation and efficient utilization. These loans are granted to corporate (or institutional) entities, other organizations or individuals recognized as borrowers under national regulations, and are used in production, trade, consumption, and other related processes.

8.E-banking business share refers to the ratio of the volume of transactions conducted via e-channels to those conducted via electronic and non-electronic channels combined and covers only domestic branches. Overseas branches and subsidiaries are excluded.

9."The Group carbon emissions" includes direct and indirect emissions produced by the Group. "The Group energy consumption equivalent to standard coal" refers to the standard coal equivalent of the volume of gasoline, diesel, natural gas, liquefied petroleum gas (LPG) and liquefied natural gas (LNG) consumed. The Group water use refers to the annual tap water consumption of the Group. The Group electricity use refers to the annual electricity consumption of the Group. The Group gas use refers to the annual natural gas consumption of the Group. The Group paper use refers to the annual paper consumption of the Group. "Head Office hazardous waste disposed" means the total hazardous waste received and disposed by the third-party company with qualification to which the Head Office transfers hazardous waste. Head Office refers to the five office buildings in Lujiazui (BoCom Financial Towers), Zhangjiang, Hongqiao (Jinming Building), Gaoke and Caohejing of Shanghai.

10.The data on bank-wide video conferences refer to the number of meetings held by the Bank of Communications as a whole, using televisions (smart screens), PCs, and mobile terminals to transmit sound and images in real-time between users in two or more locations, excluding telephone conferences.

11. The data center PUE is the ratio of total facility power to total IT equipment power at the Bank's Data Center.

12.SCVPS is based on the relevant requirements of the Shanghai Stock Exchange's Circular on

Promoting the Social Responsibility of Listed Companies and Publishing Environmental Information Disclosure Guidelines for Companies Listed on the Shanghai Stock Exchange issued on May 14, 2008, and taking into account the characteristics of the banking industry. The calculation method is: $SCVPS = \text{earnings per share} + (\text{taxes} + \text{staff cost} + \text{interest expense} + \text{total public welfare investment}) / \text{total share capital at the end of the period}$.

13. Employees (the Group) refers to the total number of regular employees and dispatched employees at its Chinese and overseas branches and subsidiaries of the Bank. "Female middle and senior management" means the number of regular and dispatched female employees at the ninth level or above in mainland branches. "Ethnic minorities" refers to the total number of employees from ethnic minorities in all mainland branches, with both regular and dispatched employees included.

14. The average training hours of employees means the average training hours received by employees of BoCom Head Office and all branches of BoCom in the Chinese mainland on the platforms, e-Campus network platform, and China E-learning Academy for Leadership.

15. Charitable donations made refers to the donations made in the name of BoCom to public programs for rural vitalization and charity in accordance with *BoCom's Measures for Managing Donations to Other Organization*.

Third-Party Statement on Greenhouse Gas Emissions and Energy Resource Data



Third-Party Statement for GHG Emissions and Energy & Resource Consumption Data

This report takes

Bank of Communications

No. 188, Yincheng Road (M), China (Shanghai) Pilot Free Trade Zone, Shanghai, 200120

as the main entity, covering the greenhouse gas emissions and major energy consumption data of all Bank of Communications' global operating institutions from January 1, 2025, to December 31, 2025.

Index	2025年	
Energy & Resource Consumption		
Scope 1	Gasoline (L)	2,620,236.41
	Diesel (L)	119,779.29
	Natural gas (Nm ³)	5,825,162.40
	Liquefied Petroleum Gas (t)	0.45
	Liquefied Natural Gas (t)	13.79
Scope 2	Electricity (kWh)	771,854,227.50
	Purchased heat (GJ)	484,428.54
Scope 3	Office Paper (t)	1,554.80
	Office Waste (t)	4,235.67
	Food Waste (t)	3,341.97
Comprehensive energy consumption (tce)		108,507.64
Comprehensive energy consumption per capita (tce/p)		0.815
Total greenhouse gas (GHG) Emissions		
Total GHG emissions : Scope 1+ Scope 2+ Scope 3 (tCO _{2e})		487,944.25
of which	Scope 1: Direct GHG emissions (tCO _{2e})	18,775.26
	Scope 2: Direct GHG emissions (tCO _{2e})	467,086.10
	Scope 3: Direct GHG emissions (tCO _{2e})	2,082.89
GHG emissions (Scope1+ Scope2+Scope3) per capita (tCO _{2e} /p)		3.66

Greenhouse gas and energy consumption accounting, based on the accounting scopes defined in: *The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard*, *The Greenhouse Gas Protocol: Corporate Value Chain (Scope 3) Accounting and Reporting Standard*, using factors from: *The 2006 IPCC Guidelines for National Greenhouse Gas Inventories (2019 Revision)*, *The General Rules for Calculation of the Comprehensive Energy Consumption (GB/T 2589-2020)*, *The Guidelines for Accounting and Reporting Greenhouse Gas Emissions from Public Building Operating Enterprises (Trial)*, *The 2022 Electricity Carbon Dioxide Emission Factor published by the Ministry of Ecology and Environment and the National Bureau of Statistics*, as well as electricity emission factor published by local governments outside China, *The Ecoinvent database*, *Carbon Testing and Carbon Footprint Public Service Platform- China Carbon Footprint Database (CNCD)*.

China Testing & Certification International Group Co., Ltd
Signature:



No.1, Guanzhuang Dongli, Chaoyang District, Beijing
Date of Statement: March 2026

Report Alignment with Regulatory Documents

Section	<i>Guidelines No. 14 of Shanghai Stock Exchange for Self-Regulation of Listed Companies—Sustainability Report (Trial)</i>	<i>Environmental, Social and Governance Reporting Code</i>
About This Report	Articles 4/6	Reporting Principles/Reporting Scope
Message from the Leadership	/	/
About BoCom	/	/
Governance		
Improving Corporate Governance	Article 12	Governance Structure
Preventing Financial Risks	/	/
Enhancing Shareholder Returns	/	/
Anti-Commercial Bribery and Anti-Corruption	Article 55	B7/B7.1/B7.2/B7.3
Anti-Unfair Competition	Article 56	/
Due Diligence	Article 52	/
Stakeholder Communication	Article 53	/
Economy		
Supporting the Real Economy	/	/
Technology Finance	/	/

Inclusive Finance	/	/
Rural Revitalization	Articles 38/39	/
Pension Finance	/	/
Digital Finance	/	/
Innovation-Driven Development	Article 42	B6.3
Environment		
Response to Climate Change	Articles 21/22/23/24/25/26/27/28	D19/D20/D21/D22/D23/D24/D25/ D26/D27/D28/D29/D34/D35/D37/ D38/D39/D40/D41
Green Finance	Articles 20/28/32/52	D19/D20/D21/D22/D27/D36
Pollutant Discharge	Article 30	A1.1/A1.5
Waste Disposal	Article 31	A1/A1.3/A1.4/A1.6
Ecosystem and Biodiversity Conservation	Article 32	A3/A3.1
Environmental Compliance Management	Article 33	/
Energy Utilization	Articles 27/35	A2/A2.1/A2.3
Utilization of Water Resources	Article 36	A2/A2.2/A2.4
Circular Economy	Article 37	A2.5
Society		
Employees	Article 50	B1/B1.1/B1.2/B2/B2.1/B2.2/B2.3/B 3/B3.1/B3.2/B4/B4.1/B4.2
Product and Service Security and Quality	Article 47	B6/B6.2
Data Security and Customer Privacy	Article 48	B6/B6.5

Protection		
Supply Chain Security	Article 45	B5/B5.1/B5.2/B5.3/B5.4
Fair treatment of SMEs	Article 46	/
Ethics of Science and Technology	Articles 41/43	/
Social Contributions	Article 40	B8/B8.1/B8.2

Notes:

1.This report has complied with the "comply or explain" provisions set out in the *Environmental, Social and Governance Reporting Code*.

2."B6.1 Percentage of total products sold or shipped subject to recalls for safety and health reasons" in the *Environmental, Social and Governance Reporting Code* is not applicable, because the group's business does not involve products sold or shipped.

3."B6.4 Description of quality assurance process and recall procedures" in the *Environmental, Social and Governance Reporting Code* is not applicable, because the group's business does not involve quality assurance or product recalls.

4.In the "Response to Climate Change – Identification and Analysis of Risks and Opportunities" section, the Bank has already conducted a qualitative analysis for D24-D25. However, due to the current lack of sufficient data accumulation on climate-related risks and opportunities, as well as the absence of industry-wide and practical scenario models, the disclosure of accurate quantitative data is temporarily not available.

5.In the "Response to Climate Change" and "Green Finance" sections, the Bank has explained the impacts of climate-related transition risks and physical risks, the impacts of climate-related opportunities, and the relevant business data of the green finance service system. The Bank has conducted internal research on the indicators corresponding to D30-D33, but as assurance has not yet been implemented, the specific data has not been disclosed.

GRI Content Index

Statement	BoCom reported the information referenced in this "GRI Content Index" for the period of January 2025 to December 2025, in accordance with the GRI Standards.	
GRI 1 Used	GRI 1: Foundation 2021	
GRI Standards	Disclosure	Chapter
GRI 2: General Disclosures 2021		
2-1	Organizational details	Company Profile
2-2	Entities included in the organization's sustainability reporting	About This Report
2-3	Reporting period, frequency and contact point	About This Report
2-4	Restatements of information	About BoCom
2-5	External assurance	Independent Assurance Statement
2-6	Activities, value chain and other business relationships	Supply Chain Security
2-7	Employees	Employees
2-9	Governance structure and composition	Improving Corporate Governance
2-10	Nomination and selection of the highest governance body	Improving Corporate Governance
2-11	Chair of the highest governance body	Improving Corporate Governance
2-12	Role of the highest governance body in overseeing the management of impacts	Improving Corporate Governance
2-13	Delegation of responsibility for managing impacts	Improving Corporate Governance
2-14	Role of the highest governance body in sustainability reporting	Improving Corporate Governance

2-15	Conflicts of interest	Improving Corporate Governance
2-16	Communication of critical concerns	Stakeholder Communication
2-17	Collective knowledge of the highest governance body	Message from the Leadership
2-18	Evaluation of the performance of the highest governance body	Improving Corporate Governance
2-19	Remuneration policies	Improving Corporate Governance/Employees
2-20	Process to determine remuneration	Improving Corporate Governance/Employees
2-22	Statement on sustainable development strategy	Message from the Leadership
2-23	Policy commitments	Message from the Leadership
2-24	Embedding policy commitments	Message from the Leadership
2-25	Processes to remediate negative impacts	Improving Corporate Governance
2-26	Mechanisms for seeking advice and raising concerns	Stakeholder Communication
2-27	Compliance with laws and regulations	Improving Corporate Governance
2-28	Membership associations	Improving Corporate Governance
2-29	Approach to stakeholder engagement	Stakeholder Communication

2-30	Collective bargaining agreements	Employees
GRI 3: Material Topics 2021		
3-1	Process to determine material topics	Improving Corporate Governance
3-2	List of material topics	Improving Corporate Governance
3-3	Management of material topics	Improving Corporate Governance
GRI 101: Biodiversity 2024		
101-1	Policies to halt and reverse biodiversity loss	Ecosystem and Biodiversity Conservation
101-2	Management of biodiversity impacts	Ecosystem and Biodiversity Conservation
101-3	Access and benefit-sharing	Ecosystem and Biodiversity Conservation
101-4	Identification of biodiversity impacts	Ecosystem and Biodiversity Conservation
101-5	Locations with biodiversity impacts	Ecosystem and Biodiversity Conservation
GRI 201: Economic Performance 2016		
201-1	Direct economic value generated and distributed	Rural Revitalization
201-2	Financial implications and other risks and opportunities due to climate change	Response to Climate Change

201-3	Defined benefit plan obligations and other retirement plans	Employees
GRI 203: Indirect Economic Impacts 2016		
203-1	Infrastructure investments and services supported	Supporting the Real Economy
203-2	Significant indirect economic impacts	Supporting the Real Economy
GRI 205: Anti-corruption 2016		
205-1	Operations assessed for risks related to corruption	Preventing Financial Risks
205-2	Communication and training about anti-corruption policies and procedures	Anti-Commercial Bribery and Anti-Corruption
205-3	Confirmed incidents of corruption and actions taken	Anti-Commercial Bribery and Anti-Corruption
GRI 206: Anti-competitive Behavior 2016		
206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Anti-Unfair Competition
GRI 301: Materials 2016		
301-1	Materials used by weight or volume	Circular Economy
GRI 302: Energy 2016		
302-1	Energy consumption within the organization	Energy Utilization
302-3	Energy intensity	Energy Utilization
302-4	Reduction of energy consumption	Energy Utilization
302-5	Reductions in energy requirements of products and services	Energy Utilization
GRI 303: Water and Effluents 2018		

303-1	Interactions with water as a shared resource	Utilization of Water Resources
303-2	Management of water discharge-related impacts	Utilization of Water Resources
303-3	Water withdrawal	Utilization of Water Resources
303-4	Water discharge	Utilization of Water Resources
303-5	Water consumption	Utilization of Water Resources
GRI 305: Emissions 2016		
305-1	Direct (Scope 1) GHG emissions	Response to Climate Change
305-2	Energy indirect (Scope 2) GHG emissions	Response to Climate Change
305-4	GHG emissions intensity	Response to Climate Change
305-7	Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	Pollutant Discharge
GRI 306: Waste 2020		
306-1	Waste generation and significant waste-related impacts	Waste Disposal
306-2	Management of significant waste-related impacts	Waste Disposal
306-3	Waste generated	Waste Disposal
306-4	Waste diverted from disposal	Waste Disposal
306-5	Waste directed to disposal	Waste Disposal
GRI 308: Supplier Environmental Assessment 2016		
308-1	New suppliers that were screened using environmental criteria	Supply Chain Security

308-2	Negative environmental impacts in the supply chain and actions taken	Supply Chain Security
GRI 401: Employment 2016		
401-1	New employee hires and employee turnover	Employees
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Employees
GRI 403: Occupational Health and Safety 2018		
403-1	Occupational health and safety management system	Employees
403-2	Hazard identification, risk assessment, and incident investigation	Employees
403-3	Occupational health services	Employees
403-4	Worker participation, consultation, and communication on occupational health and safety	Employees
403-5	Worker training on occupational health and safety	Employees
403-6	Promotion of worker health	Employees
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Employees
403-8	Workers covered by an occupational health and safety management system	Employees
403-9	Work-related injuries	Employees
403-10	Work-related ill health	Employees
GRI 404: Training and Education 2016		
404-1	Average hours of training per year per employee	Employees
404-2	Programs for upgrading employee skills and transition assistance programs	Employees
404-3	Percentage of employees receiving regular performance and career development reviews	Employees
GRI 405: Diversity and Equal Opportunity 2016		

405-1	Diversity of governance bodies and employees	Improving Corporate Governance/Employees
405-2	Ratio of basic salary and remuneration of women to men	Employees
GRI 406: Non-discrimination 2016		
406-1	Incidents of discrimination and corrective actions taken	Employees
GRI 413: Local Communities 2016		
413-1	Operations with local community engagement, impact assessments, and development programs	Social Contributions
GRI 414: Supplier Social Assessment 2016		
414-1	New suppliers that were screened using social criteria	Supply Chain Security
414-2	Negative social impacts in the supply chain and actions taken	Supply Chain Security
GRI 416: Customer Health and Safety 2016		
416-1	Assessment of the health and safety impacts of product and service categories	Data Security and Customer Privacy Protection
GRI 417: Marketing and Labeling 2016		
417-1	Requirements for product and service information and labeling	Product and Service Security and Quality
417-2	Incidents of non-compliance concerning product and service information and labeling	Product and Service Security and Quality
417-3	Incidents of non-compliance concerning marketing communications	Product and Service Security and Quality
GRI 418: Customer Privacy 2016		
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Data Security and Customer Privacy Protection

