



Bank of Communications Co., Ltd.
2024 Corporate Social Responsibility
Report (ESG Report)

March, 2025

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, 2024, and may include additional information beyond this reporting period. BoCom publishes its ESG Report annually.

The *2024 Corporate Social Responsibility Report (ESG Report) of Bank of Communications Co., Ltd.* was published on March 21, 2025.

References

This Report is prepared with reference to the *GRI Sustainability Reporting Standards* issued by the Global Sustainability Standards Board, the *Guidelines No. 14 of Shanghai Stock Exchange for Self-Regulation of Listed Companies—Sustainability Report (Trial)* by the Shanghai Stock Exchange (SSE), and the *Environmental, Social and Governance Reporting Code* by Hong Kong Exchanges and Clearing Limited (HKEX). It also aligns with relevant opinions and guidelines, including the *Opinions on Strengthening Social Responsibilities of Banking Financial Institutions*, the *Guidelines on Environmental 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 *Environmental, Social, and Governance Reporting Code* by the HKEX and the *Guidelines No. 14 of Shanghai Stock Exchange for Self-Regulation of Listed Companies—Sustainability Report (Trial)* by the SSE. Through in-depth engagement and research with internal and external stakeholders, the Bank systematically identifies environmental, social, and governance (ESG) factors relevant to stakeholders and defines the scope of issues covered in this Report. 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 of 2024 and independently audited by KPMG Huazhen LLP (Special General Partnership). Other data is primarily from 2024, 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 ESG management and practices, this Report is prepared through a structured process that includes "project approval, material collection, drafting and revisions, review by the Senior Management, review by the Social Responsibility (Environmental, Social, and Governance) and Consumer Protection Committee, review by the Board, and external disclosure." Throughout key stages such as "project approval" and "drafting and revisions", BoCom actively engages with stakeholders for feedback on 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

Schroders".

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

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

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Message from the Leadership

The year 2024 was truly remarkable. The Third Plenary Session of the 20th CPC Central Committee was successfully convened, the People's Republic of China celebrated its 75th anniversary of founding, and the country made decisive strides in deepening reforms and advancing Chinese modernization. Throughout the year, BoCom remained committed to the guidance of Xi Jinping Thought on Socialism with Chinese Characteristics for a New Era, steadfastly pursued the path of financial development with Chinese characteristics, and actively fostered a distinctive financial culture. As a key driver of the real economy and a cornerstone of financial stability, we delivered steady and high-quality growth. By year-end, BoCom's total assets reached RMB 14.9 trillion, with a net profit of RMB 93.586 billion. Our Tier 1 capital ranked 9th globally in *The Banker's* "Top 1,000 World Banks", securing a top 10 position for the third consecutive year. BoCom was also recognized as a Global Systemically Important Bank (G-SIB) for the second year in a row.

Committed to our core mission, we made significant strides in advancing the "Five Priorities" of finance. As a major state-owned bank, we remained steadfast in our core responsibilities, focusing on strengthening our overall capabilities and enhancing our support for the real economy. With a resolute commitment to becoming a world-class banking group with distinctive competitive advantages, we made significant strides across our five strategic priorities. In technology finance, we prioritized high-level technological self-sufficiency and innovation. By leveraging a full spectrum of financial instruments—including equity investment, loans, bonds, leasing, and trusts—we directed more financial resources toward the technology sector and expanded the "BoCom Technological Innovation" product portfolio. By year-end, the balance of loans to technology enterprises exceeded RMB 760 billion, while loans to strategic emerging industries surpassed RMB 860 billion. In green finance, we refined our "2+N" green finance policy framework to accelerate the low-carbon transformation of traditional industries and drive green sector development. By year-end, our green loan balance, as measured by PBOC's standards, reached RMB 892.608 billion. In inclusive finance, we upheld the principle of "financial services for the people", actively supporting micro and small enterprises (MSEs) through enhanced financing coordination mechanisms. We strengthened our efforts to assist businesses and conducted extensive outreach to enterprises and individuals. By year-end, our inclusive loan balance for MSEs reached RMB 762.073 billion. In pension finance, we built a professional, compassionate, and digitally-enabled service system, broadened pension financial product offerings, and improved payment accessibility for senior customers. We actively contributed to the

social pension insurance system while driving growth in five key areas: finance for the elderly care industry, pension fund finance, pension wealth management, consumption finance for the elderly, and age-friendly financial services. In digital finance, we led digital transformation efforts, harnessing the power of big data, artificial intelligence, blockchain, and other cutting-edge technologies to enhance frontline operational efficiency and customer experience. These advancements contributed to productivity gains across industries. Notably, four of our technological innovations received the PBOC's FinTech Development Awards.

With a deep commitment to national priorities, we leveraged financial resources to support key national strategies. We strengthened our support for key national strategies, priority sectors, and critical development areas, achieving both qualitative improvements and sustainable growth in financial supply. We actively contributed to the development of a modern industrial system, formulating tailored credit strategies for different sub-sectors. Our financial support extended to nearly 40% of China's "little giant enterprises"—specialized, high-tech firms leading in niche markets—with loan balances increasing by 55% year-on-year. We played an integral role in coordinated regional development, fully supporting Shanghai's vision to become "Five Centers" while enhancing its "Four Functions". We also facilitated the development of free trade zones, providing high-quality financial services to key regions. To support high-level opening-up, we expanded the use of RMB in cross-border transactions, advanced RMB internationalization, upgraded digital cross-border settlement platforms, and deepened cross-border financial innovation. With a strong focus on the Global South, we provided financing for key Belt and Road Initiative (BRI) projects. By year-end, our international settlement volume reached USD 512.499 billion, while cross-border trade financing totaled RMB 157.899 billion. We also pioneered new supply chain finance models, developing innovative service solutions tailored to the industrial and supply chains of advanced manufacturing. We enhanced standardized supply chain finance services, with total transactions reaching RMB 616.578 billion, supporting 55,900 core enterprises and their supply chain partners.

With a people-centered approach, we actively worked to enhance the quality of life. We prioritized the sustainable development of our employees, customers, and communities, ensuring that the benefits of our growth are shared. We established a comprehensive employee management and empowerment system, strengthening support programs to enhance well-being and a sense of belonging among our workforce. To better protect financial consumers, tens of thousands of employees participated in financial education initiatives, reaching 478 million people nationwide. We strengthened fraud prevention and scam awareness efforts, safeguarding the public's financial security. We launched the "Cultural and Tourism Showcase" initiative to stimulate new

consumption trends in culture and tourism. In support of rural revitalization, we expanded financial services for agriculture, rural areas, and farmers, and developed the "BoCom Yi Nong Tong" comprehensive financial service brand. By year-end, our agriculture-related loan balance reached RMB 841.367 billion, up 15.72%. We also intensified support for key counties and post-poverty alleviation areas, introducing a full-chain industrial assistance model and actively participating in local economic development projects to drive rural revitalization. Demonstrating our commitment to social welfare and philanthropy, we partnered with the China Disabled Persons' Federation to implement household accessibility renovations for severely disabled individuals affected by the Qinghai earthquake. Over the year, we carried out 225 public welfare projects, donating RMB 58.8399 million to empower communities and foster a more inclusive and sustainable future.

With the tide high and the wind true, it's time to set sail and break through. As 2025 marks the final year of the 14th Five-Year Plan, BoCom will continue to pursue progress while ensuring stability. We will uphold the political and people-centered nature of financial work, stay focused on our core responsibilities and principal business, and drive forward the "Five Priorities" with dedication and focus. At the same time, we will actively foster a financial culture with Chinese characteristics and provide strong financial support for broader socioeconomic development. Through high-quality financial services, we will further contribute to deepening comprehensive reforms and advancing Chinese modernization.

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

Zhang Baojiang, Deputy Party Secretary and President of the Bank

Xu Jiming, Deputy Party Secretary 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 2.84 million corporate clients and 199 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		2022	2023	2024
Economic	Total assets (RMB billion)	12,991.571*	14,060.472	14,900.717
	Total loans (RMB billion)	7,294.965*	7,957.085	8,555.122
	Net profits of the Group (RMB billion)	92.102*	92.728	93.586
	Total taxes paid (RMB billion)	36.045	30.440	32.391
	Dividend distribution (RMB billion)	27.700	27.849	28.146
	Dividend per share (RMB)	0.373	0.375	0.379
	Return on average assets (%)	0.75	0.69	0.65
	Return on average equity (%)	10.34*	9.68	9.08
	Non-performing loan (%)	1.35	1.33	1.31
	Provision coverage (%)	180.68	195.21	201.94
	Capital adequacy (%)	14.97	15.27	16.02
	Tier-1 capital adequacy (%)	12.18	12.22	12.11
	Core tier-1 capital adequacy (%)	10.06	10.23	10.24
	Total assets of banking institutions outside the Chinese mainland (RMB billion)	1,262.918	1,249.946	1,266.251
	Total profits from banking institutions outside the Chinese mainland (RMB billion)	5.111	5.318	10.389
	Total assets of controlled non-bank subsidiaries (RMB billion)	590.676*	650.999	736.009
	Total profits from controlled non-bank subsidiaries (RMB billion)	5.651*	9.081	9.185
	Balance of loans to central and western China (RMB billion)	2,222.457	2,417.331	2,582.362
	Balance of loans to micro-, small- and medium-sized enterprises (RMB billion)	2,481.831	2,760.982	2,972.323
	Balance of agriculture-related loans (RMB billion)	789.029	978.137	841.367
Social	Balance of loans to science, education, culture, and health sectors (RMB billion)	128.762	141.254	151.490
	Balance of personal loans (RMB billion)	2,366.507	2,473.100	2,752.406
	Number of outlets on the Chinese mainland	2,849	2,834	2,818
Social	Social contribution value per share (SCVPS) (RMB)	5.50	6.10	5.96
	Employees of the Group	91,823	94,275	95,746
	Female representation in middle	3,072	2,936	2,953

	and senior management (persons)			
	Employees from ethnic minorities (persons)	4,166	4,378	4,518
	Average training hours per employee	113	123	111
	Donations made (RMB million)	60.438	58.3622	58.8399
Environmental	Balance of green loans (RMB billion)	635.432	822.042	892.608
	Balance of loans to clean energy industries (RMB billion)	139.034	205.252	268.565
	E-banking business share (%)	97.96	98.09	97.85
	Water consumption by the Group (tonnes)	/	3,574,190	3,678,793
	Power consumption by the Group (MWh)	/	659,263	760,385
	Natural gas consumption by the Group (10 ⁴ Nm ³)	/	574	586
	Office paper consumption by the Group (tonnes)	/	1,802	1,785
	Total greenhouse gas emissions by the Group (tCO ₂ e)	/	444,059	487,403
	Comprehensive energy consumption by the Group (tce)	/	107,028	101,247
	Hazardous waste disposed of by the Head Office (tonnes)	0.32	1.45	0.4
	Total video conferences held across the Bank (times)	33,163	43,084	176,524
	Data center's power usage effectiveness (PUE)	1.55	1.55	1.54

*Note: The Report has restated the relevant data for 2022 based on retrospectively revised financial statements.

1.3 Honors

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

2024 Rankings/Honors	Organizers or Awarding Institutions
Comprehensive Ranking	
The 2024 List of Global Systemically Important Banks (G-SIBs)	Financial Stability Board (FSB)
Top 1,000 World Banks 2024 (No. 9)	The Banker
Business Awards	
First Prize of FinTech Development Award	The People's Bank of China (PBOC)
Model Organization in Green Banking	China Banking Association (CBA)
Data Management Capability Maturity Assessment Model (DCMM) Level-5 Certification	China Federation of Electronics and Information Industry (CFEII)
2024 Cases of High-Quality Financial Development	People's Daily
Cases of Innovative Practices in Building China into a Financial Powerhouse 2024	People's Daily Online
"2024 Annual Gala of Building a Financial Powerhouse": Digital Finance Case of the Year (Access to Medical Care by Personal Credit Records)	CCTV Finance
Awards for Excellence in Mobile Banking and in Corporate Online Banking of the Year	China Financial Certification Authority (CFCA)
Technological Progress Award for Energy Conservation and Carbon Reduction	China Energy Conservation Association (CECA), China Quality Certification Center (CQC)
Sino-Securities Index (SNSI) ESG Ratings: AA	Sino-Securities Index Information Service (Shanghai) Co., Ltd.
2024 Best Development Award for Fintech: Financial Institutions	The 5 th Yangtze River Delta Fintech Innovation & Application Global Competition
2024 GF60 Green Finance Awards: The Best Financial Institution	Green Finance Forum of 60 (GF60) at the 3 rd Green Finance North Bund Forum 2024
Best Custodian, Pension Funds	The Asset
The 22 nd China's Financial Annual Champion Awards: Pioneer Bank for Inclusive Finance, Responsible Bank for Rural Revitalization, and Innovative Bank for Financial Products in 2024	Hexun.com
Brand Awards	

2024 Best Practices in Sustainable Development by Listed Companies	China Association for Public Companies (CAPCO)
2024 People's CSR Awards: Corporate Responsibility Fulfillment	People's Daily Online
CSR Enterprise of the Year for Outstanding Impact	Xinhuanet
China Tripod Award: Outstanding Branding Case of the Year	China.com.cn
Bank with the Best Brand Image of the Year China ESG Golden Awards 2024: Enterprise of the Year for Sustainability	Sina Finance
Innovative Brand Case of the Year for Serving the Guangdong-Hong Kong-Macao Greater Bay Area	21st Century Business Herald
"Top 50 Good Companies" Excellence Development Award	JIEMIAN
Annual Special Award for Responsible Finance The Most Reputable Chinese-Listed Companies 2024: Most Socially Responsible Listed Company Award	National Business Daily
Financial Institution with Outstanding Competitiveness in Brand Building 2024	China Business Journal
New ESG Benchmark Enterprise Award	Stockstar
2024 Leading CSR Enterprises Award GoldenBee Excellent Sustainability Reports 2024: Evergreen Award	GoldenBee ThinkTank

2 Governance: Upholding Resilient Operations

Embracing Sustainable Development Trends

The Bank seamlessly integrates Party leadership with corporate governance, continuously improving its governance system, upholding business ethics, and proactively managing financial risks. We strive to meet stakeholder expectations while driving high-quality development of the Bank.

Aligning with SDGs



Our actions

Optimizing Corporate Governance; Upholding business ethics; Preventing financial risks; Strengthening CSR management

Our performance

Board of Directors meetings: 9; Board of Supervisors meetings: 4; Shareholders' general meetings: 3

2.1 Optimizing Corporate Governance

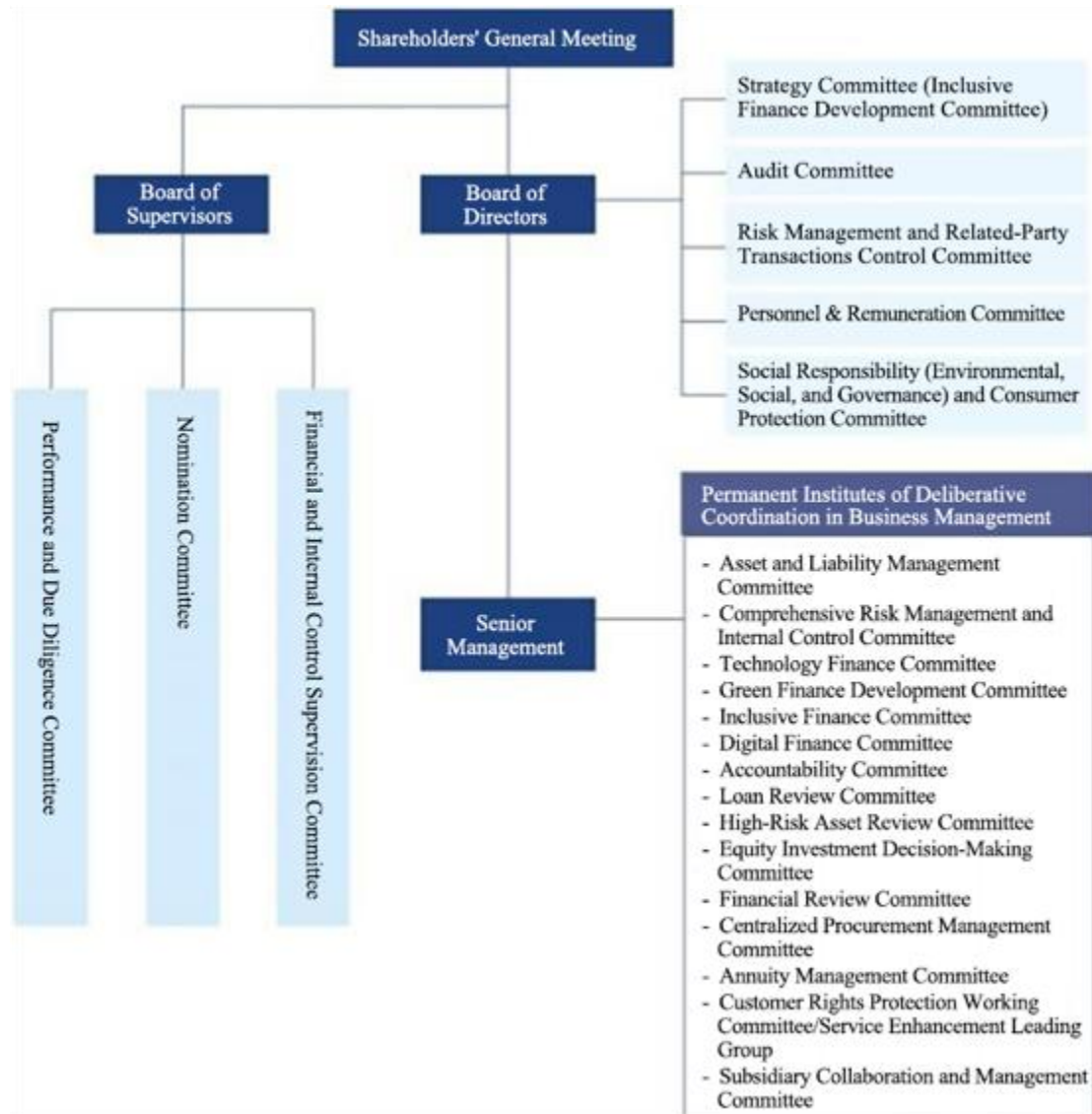
2.1.1 Upholding Party Leadership

We enhance corporate governance through Party-building, ensuring the seamless integration and effective alignment of Party leadership with corporate governance. Our priority is to clearly define the rights and responsibilities of each governance body, ensuring the effective fulfillment of our political responsibility in maintaining full and rigorous Party self-governance. To reinforce accountability and oversight frameworks, BoCom has developed and updated key documents, including the *List of Principal Responsibilities of the Party Committee of BoCom for Ensuring Full and Strict Party Self-Governance* and the *Measures for the Party Committee of BoCom to Thoroughly Implement the Principles of the CPC Central Committee's Eight-Point Decision on Improving Party Conduct*. These measures reaffirm our commitment to strengthening political awareness and upholding a people-centered approach to financial services.

2.1.2 Governance Structure

BoCom is committed to establishing a robust corporate governance mechanism in compliance with laws, regulations, and SSE/HKEX listing requirements. We continuously enhance transparency in information disclosure to safeguard the legitimate rights and interests of

shareholders. We ensure that the Shareholders' General Meeting, Board of Directors, Board of Supervisors, and Senior Management have clearly defined roles and responsibilities. At the same time, we are accelerating the development of a modern financial governance system characterized by "statutory authority, transparent rights, coordinated operations, and effective balances". These efforts aim to make our corporate governance more structured, resilient, and efficient.



Governance structure of BoCom

2.1.2.1 Board of Directors

As the Bank's highest decision-making authority, 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 efforts aim to strengthen supervision and assessment of decision implementation, ensuring a closed-loop

management framework. To enhance the Board's advisory and oversight functions, BoCom has put in place some robust mechanisms, including a conversation mechanism between the chairman and independent directors, a dedicated meeting mechanism for independent directors, a communication mechanism between independent directors and external auditors, and a regular reporting mechanism for the Senior Management.

Key Performance Highlights

As of the end of the reporting period, the Board comprised 18 members, including 4 executive directors, 8 non-executive directors, and 6 independent directors. Independent directors made up 1/3 of the Board. In addition, there was 1 female director.

During the reporting period, the Board convened 9 meetings and approved 79 proposals.

2.1.2.2 Board of Supervisors

Aligned with national strategic priorities and the Bank's development strategy, the Board of Supervisors strengthens strategic oversight and conducts reviews on the Bank's role in supporting technology finance. It offers insights and recommendations to support the Group's high-quality development. Meanwhile, it diligently fulfills supervisory responsibilities in finance and capital management, risk management, internal control, compliance, and other areas. It also standardizes the performance evaluation process for the Board, the Board of Supervisors, and Senior Management, covering 36 directors, supervisors, and senior executives.

Key Performance Highlights:

As of the end of the reporting period, the Board of Supervisors comprised 8 members: 5 male and 3 female. It included 2 shareholder supervisors, 2 external supervisors, and 4 employee supervisors.

During the reporting period, the Board of Supervisors held 4 meetings and 10 specialized committee meetings, reviewing 62 proposals and reports. It attended 3 shareholders' general meetings and was present as a non-voting attendee in 6 on-site meetings of the Board. Additionally, the Board of Supervisors conducted over 20 surveys across various levels, types, and entities, and organized specialized training sessions on corporate governance and anti-money laundering (AML).

2.1.3 Related-Party Transactions and Information Disclosure

The Board has established the Risk Management and Related-Party Transactions Control Committee to strengthen oversight and guidance on related-party transactions. The committee also

refines related-party transaction policies and systems, further standardizes transaction management procedures, and reinforces supervision and inspection.

BoCom's information disclosure has been adequate and compliant. We promptly released 155 announcements on both the SSE and HKEX, along with 21 disclosures on our official website concerning carbon emission reduction loans and related-party transactions. Additionally, we meticulously prepared high-quality annual reports with data-driven insights and trend analysis to enhance the effectiveness of information disclosure and improve report readability. BoCom remains steadfast in upholding compliance standards and has received a Grade A evaluation for information disclosure from the SSE for 11 consecutive years.

2.1.4 Enhancing Shareholder Returns

The Bank is committed to sharing its operational success with investors and enhancing communication through financial results briefings, shareholders' general meetings, roadshows, and other engagement channels. In 2024, we organized and participated in 73 investor activities, engaging with over 600 institutional investors in in-depth discussions on key capital market topics. Additionally, we hosted analyst seminars with leading institutions such as China International Capital Corporation Limited (CICC) and Zheshang Securities to explore future market trends. To stay connected with retail investors, the Bank utilized online platforms—including the SSE's E-Interaction platform, virtual investor receptions, hotlines, and investor email services—to address concerns, resolve conflicts of interest, and maintain an active market presence.

Key Performance Highlights:

During the reporting period, we held 3 shareholders' general meetings, reviewing and approving 20 proposals.

In 2023, BoCom distributed cash dividends of RMB 0.375 per ordinary share (including tax), totaling RMB 27.849 billion. This accounted for the net profit attributable to ordinary shareholders of the parent company at 32.67%.

The Bank paid dividends to preferred shareholders on the Chinese mainland, totaling RMB 1.832 billion.

2.2 Upholding Business Ethics

The Bank continuously refines its policies and systems related to business ethics, strengthening efforts in anti-commercial bribery, anti-corruption, anti-unfair competition, AML, and anti-fraud. We conduct business ethics training for all employees and perform operational and AML audits, covering key areas such as account security, fund security, information security, anti-

telecom fraud, and AML compliance. During the reporting period, the Bank was not involved in any violations or litigation related to unfair competition, and no funds were involved in litigation or major administrative penalties for such behavior.

2.2.1 Anti-Commercial Bribery and Anti-Corruption

The Bank maintains rigorous compliance with Party regulations and national laws, such as the *Constitution of the Communist Party of China*, 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 *Regulations on CPC Disciplinary Action*, 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*. We uphold strict political supervision and remain committed to strengthening discipline, promoting ethical conduct, and combating corruption. Our zero-tolerance approach to commercial bribery and corruption is reinforced through stringent policies, effective measures, and a strong culture of integrity. Additionally, we provide comprehensive anti-commercial bribery and anti-corruption training for all employees.

Key Performance Highlights

As of the end of the reporting period,

Anti-corruption training sessions for directors and employees: 25

Number of directors and employees participating in anti-corruption training: 12,090

Total training hours attended by directors and employees: 24,180

Note: For details on the number of corruption-related cases and their resolutions, please visit the website of the CPC Central Commission for Discipline Inspection.

Initiatives to combat commercial bribery and corruption

Strengthening compliance with the Eight-Point Decision on improving work conduct:

To prevent "pointless formalities, bureaucratism, hedonism, and extravagance", BoCom has improved supporting policies on financial expenditures, official receptions, and business hospitality. We have strengthened supervision and inspection of key areas such as expense management and centralized procurement. During the reporting period, we investigated and addressed 111 violations of the Eight-Point Decision, provided criticism and education to 148 individuals, and imposed Party disciplinary and political sanctions on 101 individuals.

Resolutely combating corruption: BoCom remains steadfast in its anti-corruption efforts, adhering to the three-pronged approach of "ensuring that no one dares to be corrupt, can engage in corruption, or desires corruption." We maintain strict oversight of key personnel and their exercise of power, reinforcing discipline and integrity while cracking down on corruption. In addition, we

thoroughly investigate serious violations of Party discipline and laws and continuously strengthen policy development and enforcement. In 2024, the Bank applied "four forms" of oversight and discipline enforcement; altogether, 1,654 individuals received criticism, education, or corrective action.

Whistleblower Protection

The Bank complies with the *Rules for the Handling of Accusations and Complaints 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 the Bank of Communications*, and the *Regulations on the Handling of Letters and Visits at the Bank of Communications*, among other pertinent regulations and policies. We accept reports and supervision from employees, partners, third parties, and the public through various channels, including letters, in-person visits, phone calls, and emails. The Bank strictly protects whistleblower confidentiality, ensuring that reports, evidence, and related information are never forwarded or disclosed to the accused individual or entity.

2.2.2 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 pertinent laws and regulations, as well as internal policies such as the *Strategies, Policies, and Procedures for Money Laundering Risk Management of the Bank of Communications (2020)* and the *Anti-Money Laundering Management Measures of the Bank of Communications* to constantly improve the AML-related internal control systems. In 2024, we revised the *Implementation Rules of the Bank of Communications on Anti-Money Laundering Inspection and Issue Rectification* and the *2024 Anti-Money Laundering Evaluation and Assessment Measures of the Bank of Communications*, among other policies. We also deepened AML reforms, accelerated the IT system development and digital transformation, and strengthened client due diligence. Additionally, we completed key reform tasks, including enhancements to first-line AML management and the establishment of the Group's integrated AML management framework. Through these efforts, we actively fulfill our legal and social responsibilities in AML compliance.



Shenzhen Branch conducted AML awareness campaigns

2.2.3 Anti-Fraud

The Bank strictly enforces 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 intensified efforts to combat fraud- and gambling-related crimes by establishing a proactive, intelligent, secure, and reliable fraud risk prevention and control system. Additionally, we have strengthened targeted oversight of all fund chains linked to telecom fraud and conducted anti-fraud awareness campaigns, taking concrete action to protect public funds.

Developing the "Smart Eagle" telecom fraud prevention system

Management mechanism: We assess the risk of telecom fraud in new business operations, strengthen governance, oversight, and evaluation, and enhance institutional frameworks.

Technical prevention system: By "taking real-time computing as the primary approach, complemented by batch computing, and integrating AI algorithms with rule-based models," we continuously enhance our model-driven fraud prevention system. By advancing AI and large-scale models in anti-fraud practices, we have developed a robust real-time, end-to-end monitoring engine and established a solid core model for integrated, joint prevention and control. These efforts allow us to achieve proactive prevention, real-time interception, and post-incident control.



Anti-telecom fraud awareness lecture conducted by Tianjin Branch



Anti-fraud awareness campaign organized by Sichuan Branch in E'bian County



Anti-fraud awareness campaign launched by Qingdao Branch at the Ocean University of China

2.3 Preventing Financial Risks

The Bank upholds risk prevention and control as a fundamental priority in financial operations, focusing on mitigating major financial risks. We continuously refine our risk management system, enhance digital capabilities, and remain steadfast in preventing systemic financial risks.

2.3.1 Governance

The Bank continues to modernize its risk governance framework and capabilities. During the reporting period, we enhanced coordination in comprehensive risk management by leveraging the decision-making functions of Comprehensive Risk Management and Internal Control Committees at all levels. We also reinforce the implementation and oversight of risk management responsibilities, further refining our risk management systems. Additionally, we conducted comprehensive risk assessments in key areas and implemented targeted corrective measures to address identified issues.

Risk management framework

Board of Directors	<ul style="list-style-type: none"> Assumes the ultimate responsibility for risk management and serves as the highest decision-making authority. Monitors the Bank's risk profile through the Risk Management and Related-Party Transactions Control Committee.
Board of Supervisors	<ul style="list-style-type: none"> Oversees comprehensive risk management. Supervises and evaluates the Board and Senior Management in fulfilling their risk management responsibilities, ensuring compliance and corrective actions where necessary.

Senior Management	<ul style="list-style-type: none"> ● Assumes responsibility for the implementation of comprehensive risk management across the Bank and executes the resolutions of the Board. ● Establishes the Comprehensive Risk Management and Internal Control Committee of the Bank, along with two specialized business review committees: the Loan and Investment Review Committee and the Risk Asset Review Committee. This structure maximizes the effectiveness of deliberative decision-making mechanisms and specialized review bodies, enhancing risk assessment, improving business approval efficiency, and ensuring effective risk monitoring, control, and mitigation in key areas.
Provincial and directly-managed branches, banking institutions outside the Chinese mainland, and subsidiaries	<ul style="list-style-type: none"> ● Establish deliberative and decision-making bodies, including the Comprehensive Risk Management and Internal Control Committees and business review committees as per the above framework.

2.3.2 Strategy

The Group consistently uphold a bottom-line mindset, prioritized both business development and security, and strengthened unified risk management across all entities. At the same time, we consistently reinforced asset quality, enhanced risk management in key areas, and continuously improved our comprehensive risk management capabilities. Through these robust risk management efforts, we drove the Bank's high-quality development. During the reporting period, we carried out the mid-term report of the "14th Five-Year Plan " for risk management, ensuring the solid implementation of risk management tasks during the "14th Five-Year Plan " period. The Bank continued to improve the comprehensive risk management system of "three-dimensional integration" of risk categories, institutions, and products, focused on enhancing the ability of "four early", and further promoted the implementation of the unified risk management requirements of the Group in overseas branches and subsidiaries.

2.3.3 Management of Impacts, Risks, and Opportunities

The Bank continues to enhance risk management across multiple categories, including market risk, liquidity risk, interest rate risk in the banking book, IT risk, strategic risk, reputational

risk, country-specific risk, and climate risk. We remain committed to improving risk measurement capabilities, advancing the digital transformation of risk management in a structured and efficient manner, and reinforcing consolidated oversight. As a systemically important bank both domestically and internationally, we implement integrated risk management measures and ensure steady progress in meeting additional regulatory requirements on schedule.

The Bank continues to strengthen asset quality and refine our credit policy framework in alignment with the guiding principles of the CPC Central Committee, major national strategies, industrial policies, regulatory requirements, and macroeconomic conditions. To support the "Five Priorities" of finance—technology finance, green finance, inclusive finance, pension finance, and digital finance—we have developed targeted credit allocation strategies. To further enhance risk prevention and control, we have reinforced accountability for primary responsible persons and continuously honed expertise in credit review and approval. Additionally, we successfully implemented the "Year of Post-Lending/Investment Management" campaign and achieved key objectives. At the same time, we have reinforced compliance and AML management by updating critical internal policies on operational risk, criminal case management, and outsourcing governance. Moreover, we have intensified AML efforts by enhancing internal control and compliance monitoring as well as the issue rectification process, and optimize the internal control and compliance evaluation and accountability system, strengthening case prevention mechanisms, and reinforcing legal support through a specialized team.

2.3.4 Indicators and Targets

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 82 training programs, benefiting 58,500 managers and employees. These sessions covered key areas such as risk management, asset preservation, credit management, credit approval, and internal control.

2.4 Improving Compliance Management

The Bank maintains a robust internal control management system with clearly defined responsibilities, well-structured objectives, rigorous controls, and efficient operations. Upholding the principle that "effective internal control and compliance add value", we launched a Group-wide intensive education initiative themed "Upholding the Bottom Line, Proactively Ensuring Compliance". Through case studies, lectures, and other interactive methods, we have effectively

strengthened employees' awareness of internal control and compliance. In 2024, the Bank maintained overall stability in compliance management, keeping compliance risks well under control.

Key Performance Highlights:

As of the end of the reporting period,
"President's Talk on Internal Control and Compliance" engaged over 71,000 individuals.
"Internal Control and Compliance Forum" engaged over 81,000 participants.

2.5 Strengthening CSR Management

2.5.1 ESG Management System

The Board serves as the highest decision-making authority for the Bank's CSR/ESG endeavors. Under its oversight, the Social Responsibility (Environmental, Social, and Governance) and Consumer Protection Committee regularly reviews reports from the Senior Management on green finance and consumer protection while supervising, evaluating, and monitoring the Bank's progress toward ESG goals. In 2024, the Board approved and released the *2023 Corporate Social Responsibility Report (ESG Report)* and the *2023 Annual Environmental Information Disclosure Report*, which provides a comprehensive overview of the Bank's contributions and achievements in advancing national strategies, enhancing corporate governance, driving the green transition, and fulfilling CSR commitments in 2023. The report showcases our sustainability practices to investors and stakeholders across various sectors.

Dr. Ma Jun, an independent director of the Bank, brings extensive expertise in ESG and green finance. During the reporting period, he held key positions, including Director of the Green Finance Committee of the China Society for Finance and Banking, 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). His deep expertise and practical experience have provided invaluable strategic guidance and professional support for the Bank's ESG planning and business development.

CSR (ESG) management system of BoCom

Board of Directors	● Serves as the highest decision-making authority for the Bank's CSR/ESG endeavors.
Social Responsibility (Environmental,	● Develops the Bank's CSR strategies and policies, along with plans and measures to fulfill CSR commitments; regularly reviews our progress toward CSR goals; and submits the annual CSR (ESG) reports to the

Social, and Governance) and Consumer Protection Committee	<p>Board for approval.</p> <ul style="list-style-type: none"> ● Reviews, evaluates, and enhances the Bank's ESG performance while improving the quality of ESG information disclosure; reviews consumer protection strategies, policies, and objectives; examines major issues and key policies related to consumer protection; and submits work updates and annual reports on consumer protection to the Board. ● Oversees green finance initiatives, promotes a Bank-wide commitment to green development based on energy conservation, low-carbon practices, environmental protection, and sustainability; reviews the Bank's green finance strategies, objectives, and reports, as well as credit policies related to environmental and sustainable development; and makes recommendations to the Board. ● Approves external donations within the scope authorized by the Board and, when necessary, submits requests to the Board or the Shareholders' General Meeting for approval of additional external donation quotas. ● Supervises and evaluates the implementation of the Bank's CSR/ESG, consumer protection, and green finance strategies, policies, plans, and initiatives, and provides recommendations to the Board.
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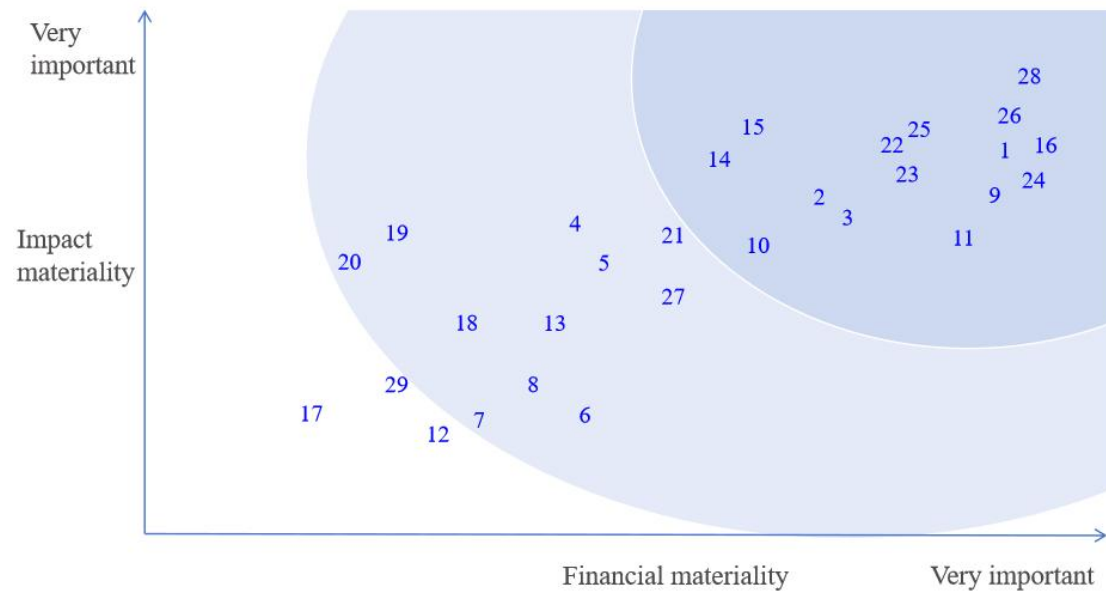
2.5.2 Materiality Analysis

Materiality assessment process

1. **Understand basic information:** We analyze the Bank's external sustainability pressures, internal sustainability management practices, types of business activities, and geographic footprint. This comprehensive knowledge enables us to understand the Bank's background and internal and external sustainability landscape, identify key stakeholders, and evaluate their perspectives and expectations.
2. **Identify potential topics:** Using SSE guidelines as a foundation, we integrate industry regulations, standards, leading international rating frameworks, capital market concerns, and broader industry trends to systematically identify material topics of dual significance and assess their potential impacts, risks, and opportunities.
3. **Assess the materiality of topics:** Through on-site interviews and online surveys, we assess the relevance of each material topic to the Bank, considering both financial materiality and impact materiality, and prioritize the material topics.
4. **Confirm and approve issues:** After the above process of issue identification and

assessment, we finalize a set of material topics based on financial and impact materiality. These topics are reviewed by experts and submitted to the Board for approval.

BoCom 2024 Dual Materiality Topic Matrix



Topics of Double Materiality to BoCom in 2024

1.Response to climate change	2.Pollutant discharge	3.Waste disposal	4.Ecosystem and biodiversity conservation	5.Environmental compliance management	6.Utilization of energy
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.Product and service security and quality	15.Data security and customer privacy protection	16.Employees	17.Due diligence	18.Communication with stakeholders
19.Anti-commercial bribery and anti-corruption	20.Anti-unfair competition	21.Green finance	22.Serving the real economy	23.Pension finance	24.Technology finance

25.Digital finance	26.Inclusive finance	27.Optimization of corporate governance	28.Prevention of financial risks	29.Increase in shareholders' returns	
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2.5.3 Stakeholder Communication

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	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, serving the real economy, and promoting technology finance, green finance, inclusive finance, pension finance, and digital finance, among others

	regulatory bodies			
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	Employee 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 its 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 its 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	development and social harmony concerns	Information disclosure and various activities	Accepting supervision and participating in industry initiatives, among others

	organizations, such as environmenta l and public welfare groups			
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3 Economy: Focusing on the Real Economy

Embracing Sustainable Development Trends

Finance is the lifeblood of the national economy and plays a pivotal role in advancing Chinese modernization. Aligned with the vision of building China into a financial powerhouse, the Bank serves as a key driver of the real economy and a stabilizing force in financial markets. By strengthening financial support for major national strategies, key industries, and underdeveloped sectors, we reinforce our commitment to fostering high-quality economic growth.

Aligning with SDGs



Our actions

Supporting the real economy; Advancing technology finance; Facilitating the implementation of national strategies; Promoting inclusive finance; Developing the pension financial sector; Innovating digital finance

Our performance

The Bank recorded total assets of RMB 14,900.717 billion, total loans of RMB 8,555.122 billion, and total tax payments of RMB 32.391 billion. Additionally, the balance of inclusive loans to small and micro enterprises (SMEs) grew by 29.10% to RMB 762.073 billion. The balance of agriculture-related loans increased by 15.72% to RMB 841.367 billion, while inclusive agriculture-related loans saw a notable rise of 23.17%, reaching RMB 120.099 billion.

3.1 Supporting the Real Economy

The Bank is committed to serving the real economy as both its foundation and ultimate goal. By leveraging technology finance, supporting China's manufacturing ambitions, and distinguishing itself through "chain finance", BoCom has significantly enhanced the efficiency and quality of financial services to better meet the diverse needs of the real economy.

3.1.1 Advancing Technology Finance

The Bank adheres to the principle of "investment in start-ups, small businesses, long-term projects, and hard-core technology", directing financial resources toward original and pioneering

sci-tech innovations to support China's drive for technological self-sufficiency and leadership. By bridging the gap between technology and finance, we are committed to providing full-lifecycle financial services to technology enterprises, supporting their steady growth and long-term development.

3.1.1.1 Governance

The Bank has established the Technology Finance Committee, responsible for formulating development plans, as well as managing, coordinating and promoting the operations and development of technology finance across the Bank. A four-tier organizational structure—comprising the head office, branches, secondary branches, and sub-branches—has been put in place to ensure seamless coordination across different levels. This structure enables effective vertical integration while also strengthening cross-functional synergies. Meanwhile, we have developed a comprehensive policy framework centered on the *Credit Support Policy for Technology Finance*, complemented by specialized policy guidelines and approval mechanisms, to deliver more precise and efficient financial services.

3.1.1.2 Strategy

In our "14th Five-Year Plan", the Bank has identified technology finance as a strategic priority in building a competitive edge. To this end, we have formulated the *Action Plan of BoCom for Technology Finance*, which aims to establish a system that supports the holistic development of technology finance through effective organizational coordination, product innovation, support mechanisms, and risk management.

3.1.1.3 Management of Impacts, Risks, and Opportunities

Through product and service enhancements, the integration of digital and intelligent technologies, and robust risk management, the Bank is committed to exploring new financial models that drive technological innovation and support the growth of technology enterprises, thereby contributing to China's vision of becoming a global leader in science and technology.

Initiatives to advance technology finance

Product innovation	<ul style="list-style-type: none"> The "BoCom Technological Innovation" brand was launched to provide technology enterprises with a comprehensive, multi-tiered suite of financial solutions, including loans, equity investments, bond financing, and technology leasing, to ensure financial support across different stages of business growth.
Digital management	<ul style="list-style-type: none"> 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.
Incentives and accountability exemptions	<ul style="list-style-type: none"> ● 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.
Risk management and control	<ul style="list-style-type: none"> ● The risk monitoring system has been optimized with customized risk models tailored to the unique characteristics of technology enterprises. This enables prompt risk alerts, real-time information sharing, and enhanced risk mitigation capabilities.

Case: Shanghai Branch launches "Intelligent IPR Loan" to facilitate financing access for technology enterprises

In April 2024, recognizing the unique characteristics of technology companies—such as the need for early-stage investment, high growth potential, and the challenge of valuing intellectual property rights (IPRs)—Shanghai Branch introduced "Tech Easy Loan – Intelligent IPR Loan", a fully digital, unsecured credit product tailored to their needs. This innovative solution leverages big data models to go beyond traditional lending approaches that rely on collateral, cash flow, and assets. Instead, it assesses creditworthiness based on technological attributes such as R&D capabilities, IPRs, the founder's educational background, and affiliations with technology parks. The loan application process is fully online, streamlined through QR code scanning, automated credit line verification, and digital fund disbursement. The credit lines are up to RMB 20 million. With its low entry requirements, high credit limits, fast approval process, and collateral-free structure, this product is ideal for technology enterprises seeking financing.



Tech Easy Loan – Intelligent IPR Loan

Case: Hebei Branch develops the first-ever online credit loan "Tech Digital & Intelligent Loan"

Hebei Branch has independently developed the first-ever online credit loan for technology SMEs—the Tech Digital & Intelligent Loan. This product revolutionizes traditional financial service models by introducing the innovative "1+N" evaluation model. By integrating internal and external data sources—including tax records, credit histories, business registrations, settlement data, and innovation reward points—the product enables multi-dimensional credit assessment. It also allows enterprises to apply instantly by scanning a QR code, receive a credit decision within one minute, and, in some cases, access funds on the same day. By simplifying access to financing, it has become a powerful tool empowering local technology SMEs. On December 30, 2024, this invention was recognized for its outstanding innovation, standing out among 616 entries in the Chinese financial sector. On that day, it received the "2024 National Financial Sector 'Five Smalls' Outstanding Innovation Award"—an honor recognizing excellence in small inventions, innovations, process improvements, design enhancements, and practical suggestions—granted by the Chinese Financial Workers' Union.



Hebei Branch staff visiting a technology enterprise to introduce "Tech Digital & Intelligent Loan"

3.1.1.4 Indicators and Targets

As of the end of the reporting period, the number of clients with credit in technology finance reached 56,400, marking a 45.37% increase from the end of the previous year. The loan balance for technology enterprises exceeded RMB 760 billion, while the balance of loans to strategic emerging industries grew by 9.05% year-on-year to over RMB 860 billion. The Bank also served nearly 40% of "little giant enterprises" that use specialized and sophisticated technologies to produce novel and unique products. The balance of loans to these enterprises increased by 55% over the end of the previous year.

3.1.2 Driving Manufacturing Development

To strengthen China's manufacturing sector, the Bank has introduced several policies, including the *Notice on Deepening Financial Services for the Manufacturing Industry to Promote New Industrialization*, the *BoCom 2024 Credit and Risk Policy Outline*, and the *BoCom 2024 Industry Credit Policy and Investment Guidance*. These policies refine the Bank's strategic approach to the manufacturing sector and set clear goals in supporting key areas, such as critical industrial supply chains, technological innovation, industrial restructuring and upgrading, and the transition to intelligent and green manufacturing. To reinforce financial support for the sector, we have enhanced resource allocation, optimized incentive mechanisms and risk controls, strengthened service capabilities, and developed specialized expertise. By accelerating the deployment of medium- and long-term financing for key manufacturing projects, we continue to expand financial backing for the industry.

Case: Liaoning Branch finances innovation in China's steel industry

Ling Yuan Iron & Steel Group Co., Ltd. is a key player in China's steel industry. Facing intensifying market competition and mounting pressure to upgrade and transform, the company

urgently needed to strengthen its competitiveness by optimizing its financing structure and expanding funding channels. Recognizing this need, Liaoning Branch promptly tailored a bond registration and issuance plan. On October 30, 2024, acting as the lead underwriter, the branch successfully facilitated the issuance of the company's first tranche of medium-term notes (MTNs) for the year in the interbank market. With a 3+N-year maturity and a total issuance size of RMB 2.2 billion, the financing provided fresh momentum for the company's transformation and sustainable development. Notably, this issuance represented the first-ever AA+ perpetual bond in China's steel industry, marking a significant breakthrough in financing innovation for the sector.

3.1.3 Forging Financial Resilience in Industrial Chains

The Bank guides its branches to leverage regional advantages and industry characteristics in manufacturing and technology to accelerate partnerships with high-quality manufacturing and technology enterprises. It has piloted an innovative industrial chain financing model that minimizes reliance on the credit of a single core enterprise and has achieved initial success in cities such as Shanghai, Beijing, and Shenzhen.

Key Performance Highlights:

As of the end of the reporting period, the business volume of industrial chain finance amounted to RMB 616.578 billion, up 6.73% year-on-year. Along the entire industrial chain, the Bank served 55,900 enterprises, up 17.94% year-on-year.

Case: Strengthening the beer industry's supply chain through chain finance

Company X, a leading beer producer in China, primarily sources from upstream suppliers in traditional manufacturing industries. These suppliers typically face settlement cycles of 3–6 months and are ineligible for conventional industrial chain financing solutions such as fast factoring and fast discounting. With limited access to stable and low-cost financing, they are forced to secure funding on their own, which has become a significant bottleneck to their development. In response, BoCom developed "Trade Easy Loan", the industry's first fully digital financing solution built on a data-interaction model tailored for scenario-based lending. Since its launch in early 2024, the product has provided over RMB 200 million in credit to more than ten suppliers, significantly enhancing financial stability across their supply chains.

3.2 Facilitating the Implementation of National Strategies

With a deep commitment to China's national priorities, BoCom leverages its strengths in

diversified operations and global services to establish a seamless, integrated financial service system that connects markets on the Chinese mainland and beyond, supports transactions in both local and foreign currencies, and bridges onshore and offshore financial operations. Through this comprehensive approach, we continuously enhance the quality and efficiency of our services in support of national strategies, optimize the allocation of financial resources, and strengthen our global service capabilities.

3.2.1 Advancing International Business Development

The Bank serves as a key financial conduit, strengthening its global competitiveness and influence by aligning with China's high-level opening-up initiatives and supporting the development of a dual-circulation economic pattern in which the domestic economic cycle plays a leading role while the international economic cycle remains its extension and supplement.

3.2.1.1 Optimizing Presence Outside the Chinese Mainland

As of the end of the reporting period, outside the Chinese mainland, the Bank has established 24 branches, subsidiaries, and representative offices and operated 66 business outlets. This expansive network spans five continents and covers major global financial centers.

Key Performance Highlights:

As of the end of the reporting period, the total assets of our banking institutions outside the Chinese mainland reached RMB 1,266.251 billion, while the international settlement volume stood at USD 512.499 billion, up 0.56% year-on-year. Cross-border trade financing totaled RMB 157.899 billion.



In 2024, BoCom's Dubai International Financial Center (DIFC) Branch opened, marking the Bank's first banking institution in the Middle East. The branch focuses on key areas of Sino-Arab cooperation, providing financial services to support the global expansion of Chinese enterprises and fostering economic and trade exchanges between the Middle East and China. It will contribute to the development of the "five cooperation frameworks" and support the building of the Sino-

Arab community with a shared future.

3.2.1.2 Supporting the "Belt and Road" Initiative

The Bank actively supports key and landmark projects under the Belt and Road Initiative (BRI), including COSCO SHIPPING's Chancay Port project and China Minmetals' mining project in Peru. Additionally, we have financed "small yet impactful" projects for local community benefits, such as Haitian Plastics Machinery's project in Serbia and Trina Solar's project in Vietnam. Through these efforts, we have helped to shape the landscape of the BRI using the power of finance.

Key Performance Highlights:

As of the end of the reporting period, the balance of BRI loans issued by the Bank's branches worldwide reached USD 12.082 billion, up 15.01% from the beginning of the year.

Case: Driving Peru's economic growth through financial support for mining

Beijing Branch leveraged its cross-border expertise to play a pivotal role in financing China Minmetals' Las Bambas copper mine project. As the co-lead bank of a syndicated loan, the branch efficiently completed the credit application and approval process, finalized the financing agreement, and successfully issued an offshore loan of USD 225 million. This funding provides strong financial support for the development of overseas mineral resources and their transportation back to China. As a flagship project under the BRI and the China-Peru Industrial Capacity Cooperation Initiative, Las Bambas is expected to contribute approximately 1.5 percentage points to Peru's annual GDP growth. Additionally, it will create over 8,000 direct jobs and about 75,000 indirect jobs, playing a significant role in driving Peru's economic growth and improving local livelihoods.



China Minmetals' Las Bambas copper mine project



Chancay Port is the first large-scale transportation infrastructure built by Chinese companies in Peru. Once completed, it will become a key economic and trade hub and a major logistics center in the South Pacific, as well as a crucial gateway for Peru to the world. BoCom provided financial support through a syndicated loan with other Chinese banks. The port was officially inaugurated on November 14, 2024.

3.2.1.3 Enhancing Cross-Border Service Capacity

The Bank remains attuned to the evolving needs of enterprises for cross-border financial services, delivering trade finance solutions through multiple channels. These solutions integrate standard offerings with tailored services and ensure seamless coordination between offshore and onshore financial operations. Through high-quality financial support, the Bank empowers enterprises to expand globally.

Initiatives to enhance cross-border financial service capacity

Addressing the need for cross-border financial services	<ul style="list-style-type: none"> ● Launched the "Inclusive Foreign Trade Growth Initiative", covering key areas such as cross-border e-commerce, market procurement trade, comprehensive foreign trade services, "Smart Forex Express", and cross-border trade financing to support foreign trade enterprises in their transformation and upgrading. ● Actively supported new forms and models of foreign trade, launching 24 such projects with a total transaction volume of RMB 73.037 billion, up 40.08% year-on-year. ● Promoted the "Foreign Trade Loan" product, which features online credit quota verification to support the financing needs of SMEs in foreign trade. Its outstanding balance grew by 91.13% since the beginning of the year.
Creating scenario-specific service solutions	<ul style="list-style-type: none"> ● Integrated domestic letters of credit (LCs) with supply chain finance and rolled out the "Electricity Bill Manager" solution across the Bank, achieving a 61.03% year-on-year growth in transaction volume. ● Developed the "Smart Forex Express", a scenario-based financial solution, offering such functions as automated applications, invoice matching, exchange rate management, and financing support. ● Promoted the "Capital Fund Manager", a pilot digital product for capital account transactions to facilitate cross-border investment and financing. Its

	transaction volume grew by 54.66% year-on-year.
Advancing digital transformation	<ul style="list-style-type: none"> ● Expanded the coverage of the "BoCom-COSCO SHIPPING Electronic Bill of Lading (eBL) Financial Service Program", securing 25 transactions. ● Participated in the development of a digital platform for shipping and trade, leveraging blockchain technology to verify cross-border LCs, central bank refinancing instruments, documentary collections, and digital currency deposit fee vouchers within the shipping & trade chain. The platform successfully implemented six business scenarios, including cross-border payments, LCs, and digital currency transfers on the Chinese mainland. ● Enhanced the Bank's digital product lineup by launching the "Easy Guarantee" online letter of guarantee service, expanded offshore online LC issuance and trade finance solutions, and improved the integrated management of offshore and onshore financial products.
Stabilizing foreign trade and foreign investment	<ul style="list-style-type: none"> ● Leveraged the "Export Credit Insurance Policy Financing" platform of the State Administration of Foreign Exchange (SAFE), which facilitates cross-border financial services under all scenarios; and introduced the "Credit Insurance Plus" programs for high-quality export-oriented clients. As a result, the balance of short-term credit insurance financing increased by 66.42% compared to the beginning of the year. ● Upgraded cross-border cash pool products to provide centralized liquidity management for multinational corporations. The volume of cross-border two-way cash pooling in local and foreign currencies amounted to USD 36.337 billion, reflecting a 21.48% year-on-year increase.

Case: Launching "Smart Forex Express" to boost BRI implementation

Henan Branch innovatively launched the first "Integrated Freight Payment System in Local and Foreign Currencies" for the China-Europe Railway Express. This system successfully addressed several challenges in freight collection at the Zhengzhou International Hub (ZIH), including long offline processes, complex operations, difficulties in reconciliation, and frequent errors. Henan Branch became the first BoCom institution to implement the "Smart Forex Express" program, pioneering a new service model for BoCom in the transportation sector. By launching this Integrated Freight Payment System, the branch laid the foundation for the Smart Forex Express product suite, making a significant contribution to integrating the China-Europe Railway Express into the BRI and actively contributing to Henan's high-level opening-up efforts.

Case: Qinghai Branch launches the first "Capital Fund Manager" digital service

Under the guidance of the SAFE Qinghai Branch, BoCom Qinghai Branch launched the province's first digital capital account service for Qinghai Copper Co., Ltd. through its "Capital Fund Manager" product. With BoCom's support, the company successfully submitted its "Payment

Instruction Letter for Facilitating the Use of Funds from Foreign Exchange Capital Account" via online banking. After verifying the online application documents, the branch processed an RMB 72 million payment on the Chinese mainland using funds from the company's foreign exchange settlement account. This service eliminates the need for corporate staff to visit a bank counter for seal verification and fund transfers, cutting processing time from one business day to just 30 minutes. By reducing operational costs and increasing efficiency, it streamlines the final step in the digital transformation of capital account services to enhance efficiency.

3.2.1.4 Promoting RMB Internationalization

Leveraging its global network, BoCom provides secure and efficient cross-border RMB payment and settlement services. We actively participate in the development of the Multilateral Central Bank Digital Currency Bridge (m-CBDC Bridge) and support the integration of our banking institutions outside the Chinese mainland into the Cross-border Interbank Payment System (CIPS). Additionally, by utilizing letters of credit and letters of guarantee supported by CIPS-standard transceivers, we have marketed and expanded our services to key clients. These efforts continue to drive the international adoption of cross-border RMB and advance RMB internationalization.

Key Performance Highlights:

As of the end of the reporting period, the Bank ranked No.1 in the market in terms of CIPS-standard transceiver customer volume.

Case: Landmark deals secured by Seoul Branch to drive RMB internationalization

Seoul Branch has actively fulfilled its role as the sole RMB clearing bank designated by the PBOC in South Korea, expanding and innovating its RMB service offerings to establish a first-mover advantage. The branch has successfully completed several landmark transactions, reinforcing the global role of the RMB and enhancing BoCom's ability to support high-level financial openness.

Landmark RMB transactions:

- The world's first offshore RMB social responsibility bond issued by a non-financial enterprise
- The first cross-border transfer of asset-backed securities (ABNs) in the Chinese market
- The first cross-border RMB lending by a non-bank financial institution in China
- The first RMB bond repurchase (repo) operation in the interbank market of the Chinese mainland
- The first RMB lending transaction cleared by a non-banking financial institution via CIPS in

Case: Participation in Singapore's largest cross-border RMB syndicated loan

Group A is the world's largest private crude oil trader and a leading player among the top five international crude oil trading firms. In 2023, BoCom was among the first banks to participate in the group's inaugural offshore RMB syndicated loan. Upon its maturity in 2024, we renewed our participation in a subsequent offshore RMB syndicated loan, marking the largest RMB syndicated loan series in Singapore's market in recent years. Our participation has not only contributed to the internationalization of the RMB but also reinforced multinational corporations' confidence in China's market, economy, and currency.

3.2.2 Supporting the Development of Key Regions

The Bank aligns its financial offerings with regional development needs, ensuring smooth economic flows into strategically significant areas. By delivering tailored, high-quality, and efficient financial services, we contribute to balanced and shared economic growth.

3.2.2.1 Supporting the "Five Centers" of Shanghai

Capitalizing on our strategic location and institutional strengths, we formulated the *Action Plan of BoCom for the Construction of "Shanghai Base" (2024)* to enhance our financial capacity in supporting Shanghai's "five centers" and promote our own high-quality development.

Initiatives to support Shanghai's "Five Centers" development

Rolling out innovative green finance products for Shanghai	<ul style="list-style-type: none"> ● Formulated a comprehensive service plan to support the green and low-carbon transformation of the shipping industry, and compiled the <i>Carbon Emission Accounting Report of Financial Institutions in Pudong New Area (BoCom)</i>. This made us one of the first banks in Shanghai to conduct carbon emission accounting and information disclosure. ● Joined the pilot climate investment and financing program in Pudong New Area, released the first deal in Pudong's climate investment and financing project pool, and signed a cooperation agreement with the Pudong Ecological Environment Bureau. ● Executed China's first transition loan for the water transportation industry and Shanghai's first for the steel and chemical industries, along with China's first "large-scale equipment renewal and consumer goods trade-in" + "transformation" bond, thereby strengthening our transition finance portfolio.
Setting new standards for innovative bonds	<ul style="list-style-type: none"> ● Served as the sole banking participant in designing the pilot program for entities on the Chinese mainland to underwrite Free Trade Zone (FTZ) offshore bonds under Pudong New Area's Pilot Comprehensive Reform Plan, and issued the market's first hybrid sci-tech note with perpetual terms, the first

	ultra-long-term floating-rate bond, the first government-subsidized housing bond designed for both daily and emergency use, and Shanghai's first transition note.
Supporting major events	<ul style="list-style-type: none"> ● Provided essential support for the China International Import Expo (CIIE) for three consecutive years and played a key role in major events, including the Lujiazui Forum, the Shanghai International Carbon Neutrality Expo, and the World Artificial Intelligence Conference.

Case: Enhancing the role of finance in driving sci-tech innovation

To support China's national strategy of becoming a global leader in science and technology and to help Shanghai develop into a world-class hub for sci-tech innovation, Shanghai Branch successfully issued the second tranche of medium-term notes in 2024 for Shanghai Lingang Economic Development (Group) Co., Ltd. ("Lingang Group"). This issuance marked China's first hybrid sci-tech notes with perpetual terms. The proceeds will primarily fund Lingang Group's capital contributions to venture capital funds supporting sci-tech innovation, as well as equity investments in enterprises. The coupon rate is linked to the future returns of the venture capital funds, incorporating quantitative triggers that allow bond investors to participate in the funds' potential growth. This innovative structure attracts long-term patient capital to critical technology sectors and early-stage tech enterprises.

3.2.2.2 Accelerating Development in the Greater Bay Area

The Bank developed the *Action Plan of BoCom for Supporting the High-Quality Development of the Guangdong-Hong Kong-Macao Greater Bay Area (2024-2025)* and pioneered the launch of multi-functional free trade accounts ("Electronic Fence" or "EF" Accounts) in the Guangdong-Macao In-Depth Cooperation Zone in Hengqin. This innovation has positioned BoCom as a market leader in diversified account services. Additionally, we launched the "BoCom Channeling Financial Resources to Enterprises in the Greater Bay Area" campaign and established a collaborative platform that connects banks, governments, enterprises, universities, and research institutes to drive high-quality regional development.

Case: Guangdong Branch launches the EF Account System in Hengqin

In May 2024, Guangdong Branch successfully introduced the EF Account system for the Guangdong-Macao In-Depth Cooperation Zone in Hengqin ("Hengqin Zone"). This system provides a comprehensive suite of financial services such as cross-border fund settlement, foreign exchange, investment, and financing for eligible clients and non-residents within the zone. Leveraging the EF Account system, the branch facilitates multi-currency account openings for enterprises, individuals, and financial institutions. These include Hengqin Zone institutional

accounts (EFE), offshore corporate accounts (EFN), offshore individual accounts (EFF), and interbank institutional accounts (EFU). Through the Free Trade Accounting Unit which connects markets and resources on the Chinese mainland and beyond, the branch provides diversified financing channels and market-driven interest rates, promoting the liberalization and facilitation of trade, investment, and financing in the region.



Launching ceremony of the Hengqin Global Bay Areas Forum under the "BoCom Channeling Financial Resources to Enterprises in the Greater Bay Area" campaign

3.2.2.3 Driving FTZ Development

The Bank is committed to leading financial innovation and actively contributing to the reform and development of Free Trade Zones (FTZs) and Free Trade Ports (FTPs). Recognizing the distinct characteristics of FTZs, we have developed tailored financial service programs based on the FT Account system, product applications, service scenarios, and specialized policies. Specifically, we have supported the high-standard institutional opening of the China (Shanghai) Pilot Free Trade Zone (SHFTZ) and facilitated the market's first cross-border transfer of asset-backed securities (ABS), thus broadening cross-border asset transfer applications. Additionally, we formulated the *Action Plan of BoCom for Supporting the High-Quality Development of Hainan Free Trade Port (2024-2025)*. For the first time, the Bank utilized the EF Account system to provide fund settlement services for the Department of Finance of Hainan Province, facilitating its offshore bond issuance in Hong Kong. This milestone expanded EF Account applications.

Case: The first cross-border ABS transfer executed in the market

In response to the *General Plan for Advancing Institutional Opening-up of China (Shanghai) Pilot Free Trade Zone in Alignment with High-Standard International Economic and Trade Rules* issued by the State Council, BoCom established a dedicated work group for innovative businesses. As an RMB clearing bank, Seoul Branch facilitated the transfer of high-quality RMB assets on the Chinese mainland by acquiring ABS of a renewable energy enterprise held by BOCOM Wealth from the interbank market. This transaction, completed on April 30, 2024, marked the first cross-

border transfer of ABS in the market. This milestone expanded cross-border asset transfer participation to include asset management firms, diversified transaction types to cover ABS, and broadened RMB financing channels for enterprises on the Chinese mainland, injecting fresh momentum into the internationalization of RMB assets.

3.3 Advancing Inclusive Finance

The Bank remains committed to a customer-centric approach, developing a multi-tiered, broad-reaching, and sustainable inclusive finance system. This system is designed to continuously support economic and social development, address the growing financial needs of individuals, and enhance the coverage, accessibility, and user satisfaction of inclusive financial services. Our goal is to make financial services truly inclusive and beneficial to all.

3.3.1 Governance

The Bank places a strong emphasis on inclusive finance, strengthening top-down planning, and establishing a well-structured governance framework. At its core is the Inclusive Finance Development Committee, supported by the Leading Group for Rural Revitalization and the Inclusive Finance Committee. Additionally, dedicated inclusive finance divisions have been established at both the Head Office and provincial branches. In addition, the Bank has formulated key strategic documents, including the *Action Plan of BoCom for Inclusive Finance (2024-2025)* and *BoCom's Opinions on Developing Inclusive Credit 2024*, which serve as the blueprint for advancing inclusive finance. By mobilizing resources across the Bank, we continue to enhance the quality and efficiency of inclusive financial services.

Key Performance Highlights:

As of the end of the reporting period, the Bank convened 3 meetings of the Inclusive Finance Committee.

3.3.2 Strategy

The Bank has elevated inclusive finance to a core strategy. In its 14th Five-Year Plan, inclusive finance is explicitly recognized as a key pillar in strengthening the Bank's competitive advantages. We are committed to advancing inclusive finance through targeted initiatives, including dedicated credit plans, increased performance appraisal weightings, liability exemption for proper credit due diligence, preferential funding support, and expanded resources for critical sectors.

3.3.3 Management of Impacts, Risks, and Opportunities

The Bank continuously strengthens risk management, service channels, and the quality of inclusive finance products and services. Our goal is to build a distinct competitive edge while comprehensively enhancing management efficiency and service effectiveness.

3.3.3.1 Preventing and Controlling Inclusive Credit Risks

Leveraging digital capabilities, the Bank enhances its risk management for inclusive credit, improving risk prevention and mitigation. These efforts strengthen our confidence, willingness, capacity, and expertise in lending to SMEs.

Initiatives for digital management of inclusive credit risks

Integrated external data sources, including the national SME financing credit service platform and the PBOC's capital flow information platform; updated online credit strategies and risk control models; and strengthened inclusive credit risk management.

Intensified digital monitoring of credit risks, achieving 87% early warning coverage for customers with overdue inclusive loans.

Advanced centralized post-lending monitoring and management at both the Head Office and branch levels; leveraged AI-powered loan fund flow analysis; and expanded the use of loan payment whitelisting tools to improve post-lending management quality and efficiency.

3.3.3.2 Upgrading Service Channels

The Bank is committed to enhancing both the functionality and quality of its offline outlets, transforming them into specialized and differentiated service hubs. Leveraging our extensive network across urban and rural areas, we aim to deliver inclusive financial services to a diverse customer base.

To improve operational efficiency and service quality, the Bank has expanded its presence in key regions and county-level areas through a well-planned outlet distribution strategy. As of the end of the reporting period, we operated 2,818 licensed outlets on the Chinese mainland, covering all provincial-level administrative regions. Our footprint extended to all prefecture-level and higher-tier cities across 12 provinces and centrally administered municipalities in key regions, including the Yangtze River Delta, the Guangdong-Hong Kong-Macao Greater Bay Area, and the Beijing-Tianjin-Hebei region. Additionally, we established 319 outlets in 193 counties, including county-level cities, counties, and autonomous counties.

Distinctive services at offline outlets

Expanding inclusive	● Developed performance indicators to assess the number of outlets successfully integrating inclusive finance and retail asset businesses in compliance with
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finance to lower-tier markets	<p>prescribed standards, and reallocated resources to support inclusive finance operations at more locations.</p> <ul style="list-style-type: none"> ● Promoted full participation in inclusive finance, achieving 84% coverage of inclusive business among account managers.
Deploying smart equipment and machines	<ul style="list-style-type: none"> ● Deployed self-service ATMs, "Smart Kiosks", and other smart machines across various regions to enhance service accessibility. These machines offer 24/7 access to deposits, withdrawals, transfers, bill payments, and inquiries, ensuring convenient banking services in nearly all rural and remote areas.
Improving accessibility	<ul style="list-style-type: none"> ● Upgraded accessibility features, including wheelchair-accessible pathways and call buttons (telephones), and introduced Braille-coded keypads and functional buttons to better accommodate the needs of people with disabilities.
Enhancing international services	<ul style="list-style-type: none"> ● Deployed smart machines compatible with foreign cards and introduced over ten English-language functions, including inquiries, transfers, contract signing, and password changes; and installed foreign currency exchange machines to facilitate diverse payment needs for international customers in China.

Key Performance Highlights:

As of the end of the reporting period,

87.66% of outlets met the standards for inclusive asset business.

A total of 18,061 smart machines were deployed.

91% of outlets (2,553 in total) were equipped with accessibility features.

3.3.3.3 Enhancing the Quality and Efficiency of Inclusive Finance

The Bank continues to refine financial products, services, and workflows, exploring effective strategies to drive the high-quality growth of inclusive finance. Efforts focus on improving inclusive finance accessibility and convenience while expanding financial support for SMEs and rural revitalization initiatives.

Enhancing the quality and efficiency of inclusive finance

Institutional system	<p>The Bank developed the <i>Action Plan of BoCom for Aligning with the Coordination Mechanism to Support Small and Micro Enterprises in Accessing Financing</i> and established a four-tier work team structure at the head office, branches, secondary branches, and sub-branches. Fully aligned with government coordination mechanisms at all levels, the Bank has promoted a comprehensive suite of inclusive finance services, conducted extensive outreach to enterprises and individuals, expanded the supply of first-time loans, renewed loans, and credit loans, and maximized financial support for enterprises on the recommended list.</p>
Branding	<p>The Bank promoted two credit and two loan brands to advance inclusive finance and rural revitalization, introducing a range of standardized and specialized online products, including quick loans for electricity charges, comprehensive mortgage loans, and batch-guaranteed loans. A unified platform for online inclusive products was</p>

	developed to improve access to digital financing. This approach helped foster a dual-track development model, with standardized products expanding market reach and scenario-specific products creating distinct business advantages.
Product innovation	Recognizing the unique financing needs of technology enterprises at various stages—from start-up to growth and maturity—the Bank leveraged sci-tech innovation refinancing policies to create the "Tech Easy Loan" product line, specifically designed to support technology SMEs throughout their lifecycle.
Data empowerment	The Bank upgraded its Inclusive Finance 2.0, offering a one-stop platform for SMEs to access comprehensive financial services via mobile banking, including settlement, payroll processing, and financing. This enhancement makes it easier for businesses to access both financial and non-financial services anytime, anywhere.
Proactive credit granting	The Bank developed a proactive credit service model by strengthening partnerships with key institutions, including the Torch High Technology Industry Development Center (Torch Center) under the Ministry of Industry and Information Technology (MIIT) and local credit information companies. Leveraging big data, the Bank has implemented batch credit granting for technology SMEs, encouraging account managers to proactively extend loans directly to customers.
Loan pricing	The Bank introduced an inclusive loan pricing management system for corporate clients, integrating regional pricing benchmarks, loan categories, customer risk levels, and value contributions. This system enables customized pricing for each customer and transaction, ensuring a balanced approach to loan volume, pricing, and risk management. It also fosters a sustainable growth cycle, driving the mutual development of asset and liability businesses.

Honors and Awards:

Received the "Pioneer for Inclusive Finance" and "Responsible Bank for Rural Revitalization" by Hexun.com.

"Tech Easy Loan" selected as one of the outstanding cases in the "Technology Finance Pioneer List" at the China International Fair for Trade in Services 2024.

3.3.4 Indicators and Targets

The Bank has established clear targets and indicators to steer the high-quality development of inclusive finance in the new era. As of the end of the reporting period, the balance of inclusive loans to SMEs reached RMB 762.073 billion, reflecting a 29.10% increase. The number of inclusive loan clients totaled 416,200, up 21.88% from the previous period. Meanwhile, agriculture-related loans recorded a balance of RMB 841.367 billion after a 15.72% growth, while the balance of inclusive agriculture-related loans rose by 23.17% to RMB 120.099 billion.

3.4 Contributing to Rural Revitalization

Aligned with the strategic goal of building up China's strength in agriculture and guided by the principles of "targeted priorities and specialized services", the Bank has made every effort to provide diversified and comprehensive financial support for agriculture, rural areas, and farmers (the "Three Rural Issues" or "Sannong"). By channeling financial resources to benefit farmers, villages, and rural industries, we have enhanced the accessibility and convenience of financial services, expanding our range of financial offerings to foster rural prosperity and effectively supporting the development of a strong agriculture sector.

Key Performance Highlights:

As of the end of the reporting period, our agriculture-related loan customers reached 216,477.

3.4.1 Governance

The Bank has established a leading group for rural revitalization at the head office level, led jointly by the Chairman and the President. The group is responsible for formulating and refining financial service mechanisms for rural revitalization, and overseeing the strategic planning and implementation of the Bank's rural revitalization initiatives and targeted assistance efforts. We have also developed policies such as the *2024 Action Plan of BoCom for Drawing on Experience from the Green Rural Revival Program in Zhejiang Province to Facilitate Comprehensive Rural Revitalization*, the *Opinions on Promoting High-Quality Development of County-Level Institutions*, and the *2024 Work Plan of BoCom for Targeted Assistance*, to coordinate and advance rural revitalization and targeted assistance efforts and drive rural development to new heights.

Key Performance Highlights:

As of the end of the reporting period, the Leading Group for Rural Revitalization held 2 meetings.

3.4.2 Strategy

The Bank has actively implemented the CPC Central Committee's strategic plans for advancing rural revitalization across the board and strictly upheld the guiding principles of the 20th CPC National Congress, the 2nd and 3rd Plenary Sessions of the 20th CPC Central Committee, the Central Economic Work Conference, and the Central Rural Work Conference. With a strong sense of responsibility and a focus on "targeted priorities and specialized services", we have continuously innovated our products and services to provide comprehensive financial support for agriculture, rural areas, and farmers. Our aim is to fully leverage our financial expertise to effectively fulfill our responsibility in delivering targeted assistance.

3.4.3 Management of Impacts, Risks, and Opportunities

The Bank has strengthened its commitment to rural revitalization and targeted assistance. We have leveraged our resources to upgrade agriculture-related financial products, service channels, and business processes, expanded the reach of offline outlets, and broadened our "Sannong" service coverage, significantly improving the quality and efficiency of both financial and non-financial services.

3.4.3.1 Advancing Comprehensive Rural Revitalization

The Bank focuses on priority issues to accelerate comprehensive rural revitalization, addresses the diverse financial needs in rural areas, and bridges the "last-mile" gap in delivering financial services to rural communities. Through these efforts, we have made even greater contributions to Chinese modernization.

Financial initiatives to advance rural revitalization

Focusing on priority issues	<ul style="list-style-type: none">● Dawning on experience from the Green Rural Revival Program in Zhejiang Province, we have increased financial support to priority issues including food security, consolidation and expansion of achievements in poverty alleviation, industrial revitalization, infrastructure construction, and rural governance, enhancing the quality and efficiency of services.
Rolling out innovative products and services	<ul style="list-style-type: none">● We have enhanced and refined our product portfolio, strengthened online cooperation models with local agricultural guarantee institutions, and implemented 38 distinctive agriculture-related programs, including the "Inner Mongolia Agricultural and Pastoral Loan", the "Jiao Nong e-Loan", and the "Guizhou Agricultural Trade Loan", providing inclusive financial services to new agricultural operating entities and rural households.● We have upgraded basic rural financial services and launched China's first offsite financial service pods.

Honors and Awards:

Our "Leveraging Financial Expertise to Drive Rural Industrial Development" program was selected as an "Excellent Practical Case in Financial Services for Rural Revitalization" by China Urban-Rural Financial News.

Case: Gansu Branch launches "Jiao Nong e-Loan" to support new agricultural

operating entities in a targeted manner

In collaboration with Gansu Agricultural Financing Guarantee Co., Ltd. ("GSAFG"), the Gansu Branch has developed the customized financial product "Jiao Nong e-Loan" to support six key local agricultural industries—cattle, sheep, vegetables, fruits, potatoes, and medicinal herbs—under the "Ganwei Brand" initiative (literally "Gansu-taste Brand"). This tailored financial product is designed to meet the working capital needs of new agricultural operating entities including farmers, family farms, and specialized farmer cooperatives for activities such as planting, breeding, wholesale trade, and processing. Entities can apply for loans offline by submitting the required materials to bank outlets, and the funding will be available within a week after verification and approval. Alternatively, they can access the "Jiao Nong e-Loan" product page on the GSAFG New Farmer App or scan the product's dedicated QR code to complete the entire loan process online—from application and approval to disbursement and repayment—and receive their loans in as little as three days. This integrated approach offers farmers convenient, one-stop financing and guarantee services without the need to visit a branch.

Case: Sichuan Branch launches "Grain and Oil Supply and Marketing Loan" to pioneer a "finance + supply and marketing" cooperative service model

In partnership with Sichuan Supply and Marketing Technology Industry Group Co., Ltd., the Sichuan Branch has launched the "Grain and Oil Supply and Marketing Loan", China's first fully online credit loan product that covers the full cost of grain production. Empowered by data exchanges with the partnering company's platform, the entire loan process—from credit application to remote verification and fund disbursement—can be completed in as little as two hours. This innovative solution addresses long-standing agricultural financing challenges such as lengthy offline approval cycles and low credit limits and effectively directs financial resources into Sichuan's farmland, strengthening the production and supply of grain and other essential agricultural products, and contributing to the province's development as a major granary in the new era.

Case: The first Sannong-specialized "BoCom Cloud" financial service pods launched

On September 22, 2024, BoCom launched its first Sannong-specialized cloud-based financial service pods in Huinong and Minzhu Villages of Zhujing Town, Jinshan District, Shanghai. An example of technology-empowered financial services, the pods integrate remote video, facial recognition, and other advanced technologies, and provide rural communities with the access to state-of-the-art financial equipment. They offer 39 financial services, including essential personal

banking functions such as debit card transactions and digital wallets, and inclusive financial solutions. With fully online operations, the pods eliminate the constraints of physical outlets and resolve the common banking challenges in rural areas such as limited mobility for farmers and long wait times, providing robust financial support for rural revitalization.



"Financial Support for Farmers" activities undertaken by sub-branches of Xinjiang Branch

3.4.3.2 Expanding Financial Aids to Increase Rural Incomes

The Bank strictly adheres to the national requirements of "continuing poverty alleviation policies and government supervision for previously impoverished populations, villages, and counties until their status is secure", and ensures the overall stability of assistance policies, efforts, and teams while safeguarding against large-scale relapse into poverty. By leveraging our comprehensive licensing advantages, we have launched all-around, multi-level, and multi-field assistance initiatives, striving to turn targeted assistance efforts into a model for financial empowerment.

Five major initiatives for rural revitalization

Industry revitalization	<ul style="list-style-type: none"> We have supported the development of specialty industries such as astragalus in Hunyuan County, cultural tourism in Litang County, and edible fungi in Tianzhu County. By fostering local employment opportunities for formerly impoverished communities, this initiative provides sustainable, income-generating assistance that promotes long-term self-sufficiency.
Talent revitalization	<ul style="list-style-type: none"> Focusing on talent gaps and technical weaknesses in key domains such as industrial development and rural construction, we have increased training efforts for local trainees in supported areas to enhance their ability to contribute to rural revitalization.
Culture	<ul style="list-style-type: none"> We have organized study tours to Shanghai for outstanding students from

revitalization	<p>financially disadvantaged families in supported counties, helping them broaden their horizons and gain valuable experience.</p> <ul style="list-style-type: none"> ● We strive to promote a new wave of ethical values and positive moral behaviors through initiatives including point-based rewards systems, red and black lists, merit appraisals, and recognition programs including "Safe Families", "Most Beautiful Families", and "Beautiful Courtyards".
Ecology revitalization	<ul style="list-style-type: none"> ● We have implemented a targeted environmental improvement initiative in key areas of supported counties and villages, including grasslands, rivers, and roadways, to ensure that villages stay clean and well-maintained, contributing to the improvement of rural living conditions. ● As of the end of the reporting period, the Bank had disbursed loans totaling RMB 90,589,100 for new energy projects in the supported counties, contributing to the development of new energy industries and environmental protection efforts in these counties.
Organization revitalization	<ul style="list-style-type: none"> ● We have carried on the practice of themed Party Day events for joint learning and development between the Party branches of the Bank in the supported counties and the local village Party branches, effectively strengthening grassroots Party building in rural areas.

Case: "Smart Village Affairs" cloud-based service injects new vitality into rural revitalization

BoCom is committed to building a new digital system for rural governance. In Chakouyi Village, Tianzhu County, one of our supported counties, we have piloted the "Smart Village Affairs" comprehensive service platform, integrating Party affairs, village affairs, and financial services. By enabling timely transparency and easy access to village affairs, the platform enhances village autonomy and improves the digitalization, intelligence, and convenience of rural governance. It also strengthens the monitoring and support mechanisms for poverty prevention by allowing for one-click reporting of struggling households' situations, helping village officials become guardians of accurate, timely assistance. BoCom has set up a dedicated section for financial assistance on the platform, directing resources to key and weak sectors in agriculture and rural areas. This offers rural households and agribusinesses easy access to efficient and high-quality financial services, thus stimulating the internal momentum for rural revitalization and advancing shared prosperity.



"Smart Village Affairs" comprehensive service platform

Case: The honey industry in Litang County takes off again amid technology-empowered rural revitalization drive

Since 2015, BoCom has targeted poverty alleviation Litang County in Sichuan Province. By embedding the concept of technology-driven poverty alleviation in this region, the Bank has sown seeds of hope and opportunity. In 2023, BOCOM Fintech launched the innovative beehive adoption mini-program, providing farmers with scientific beekeeping guidance based on real-time monitoring and data analysis to improve honey yield and quality. It also allows consumers to participate in beekeeping remotely by adopting beehives. In 2024, the mini-program was upgraded for a more user-friendly interface, enhanced ease of use, and exciting reward incentives for consumers. These improvements have expanded the initiative's impact, bringing tangible benefits to farmers in Litang.



3.4.4 Indicators and Targets

In 2024, the Bank achieved key annual indicators for targeted assistance, with relevant efforts remaining unabated. As of the end of the reporting period, the Bank donated to the supported counties RMB 26 million, invested in repayable assistance funds RMB 339,274,700, an increase of 29.38%, and brought in assistance funds (including repayable and non-repayable assistance funds) totaling RMB 21,548,000, an increase of 12.24%. We purchased and facilitated sales of agricultural products worth RMB 35,294,400, an increase of 5.24%, introduced 7 assistance projects or enterprises, with an actual investment of RMB 170 million, and provided training for 4,446 persons from supported counties, an increase of 6.64%.

3.5 Safeguarding a Better Life

The Bank is committed to the principles of finance for the people and finance benefiting the people. We address public needs with intelligent, personalized, and attentive products and services that integrate deeply into everyday life and consumption scenarios, continuously enhancing the core role of finance in improving quality of life.

3.5.1 Meeting the Financial Needs of the People

Guided by a people-centered development philosophy, the Bank has enhanced the quality and efficiency of its end-to-end wealth management services to better meet the diverse wealth management needs of customers, effectively strengthening their sense of fulfillment, happiness, and security.

Initiatives to benefit the people

Enhancing the inclusiveness of wealth management	<ul style="list-style-type: none"> ● We have enriched the supply of inclusive wealth management products. We are among the first to launch commercial pension insurance and family service trust products, and have introduced 1,737 mutual funds, wealth management, and insurance products with low minimum investment thresholds. Inclusive wealth management products now account for 85.37% of our offerings. ● We have improved the dynamic adjustment mechanism for product listings, continuously strengthening product management. By diversifying income channels, we have helped increase residents' property income, with wealth products generating a cumulative total of RMB 41 billion in returns for customers.
Improving the management system	<ul style="list-style-type: none"> ● Products: We have selected only the best products and strengthened the development of the "Wo De Selective" brand. The "Wo De Selective" funds keep outperforming the market in their average returns. ● Sales: We have taken the lead in standardizing the sales process of wealth management products by formulating the <i>Guidelines for BoCom Branches Regarding the Sales of Personal Wealth Management Products</i>. ● Services: We have redesigned the mobile banking finance channel to improve product display, selection, and transaction functions, enhancing customer experience. Additionally, we have launched a personal wealth management system, offering "one-account, one-strategy" asset allocation solutions for all individual clients. The system enables accurate matching between customers and products, shifting the wealth management business model from product sales to advisory services. We have also promoted dynamic asset allocation for funds across the Bank, further optimizing our after-sales services.

Honors and Awards:

The "Golden Wealth Management Awards: Bank Wealth Management Brand of the Year" from Shanghai Securities News, the "Top Financial Institutions in China 2024: Wealth Management Bank" from Cailianpress.com, and the "Yinghua Awards: Outstanding Wealth Management Institution and Outstanding Wealth Management Sales Bank" from China Fund.

3.5.2 Developing the Pension Financial Sector

The Bank has established a leading group for pension finance and developed the *Action Plan of BoCom for Pension Finance (2024-2025)* to create a comprehensive pension financial service system featuring "clear strategies, robust mechanisms, extensive coverage, comprehensive product portfolios, and exceptional services". We have made significant strides in five key areas: finance for the elderly care industry, pension fund finance, pension wealth management, consumption finance for the elderly, and age-friendly financial services to fully address both the financial and non-financial needs of the elderly population.

Pension financial services

Support for the elderly care industry	We have continuously increased the credit supply and services for the elderly care industry to boost its healthy development.
Pension fund services	We have contributed to the development of a multi-tiered and multi-pillar old-age insurance system in China by offering comprehensive services such as third-generation social security cards, annuity account management and custodianship, and personal pension solutions. These services enable residents to easily access national social security benefits, ensuring pension accumulation and the preservation and growth of its values. Additionally, we have built a one-stop personal pension service system that integrates "account opening, fund contributions, product investments, and comprehensive services", providing a convenient, intelligent, and seamless experience for customers. We issue third-generation social security cards that integrate functions for social security applications, financial services, and everyday life scenarios. We have also continuously enhanced account management and custodianship services for the National Social Security Fund, the Basic Pension Fund, and the Enterprise (Occupational) Annuity.
Age-friendly outlets	We provide age-friendly services by enhancing outlet infrastructure, service models, and product innovations, among others, and have rolled out age-friendly demonstration outlets nationwide, aiming to create a warm and supportive service environment for elderly customers.
Digital services	We have developed a "Care Version" of the mobile banking app, designed to make key information easy to read, essential functions easy to find, and operations easy to understand, thereby improving user experience for elderly customers. We have launched the "Care Version" for Cloud BoCom, offering

	remote video-based, one-stop comprehensive financial services through channels such as mobile banking, WeChat mini-program, and smart devices. The service enables elderly users to conveniently handle their financial needs online, without having to leave their homes.
Services for the elderly	We have innovated our service models by bringing activities directly into communities and services into homes. Through systematic efforts in knowledge dissemination, cultural and sports activities, and door-to-door services, we have engaged with residential compounds, retirement communities, welfare homes, and silver industry expositions to deliver attentive financial services to elderly customers.

Case: Zunyi Branch launches BoCom's first self-built senior canteen

By the end of November 2024, through the collaborative efforts of the Bank, the government, and enterprises, the Zunyi Branch established a senior canteen in Zhongzhuang Community, Honghuagang District, Zunyi City. This marks the first elderly canteen enabled by the Bank's self-developed platform and signifies a major milestone in the Zunyi Branch's initiative of "creating distinctive branches with strong community connection and enhancing dual-channel (online and offline) pension financial services." The canteen offers various payment methods, including face recognition, QR code scanning, and card swiping, and has received positive feedback from senior citizens. In partnership with the Civil Affairs Bureau of Honghuagang District, the branch is expanding the senior canteen practice to 7 other communities, with the goal of benefiting over 1,000 elderly households once the canteens are fully operational.

Case: Chongqing Branch launches China's first pilot platform for pension institution deposit supervision

On October 30, 2024, under the guidance of the Chongqing Municipal Civil Affairs Bureau and the Chongqing Municipal Judicial Bureau, the Chongqing Branch took a significant step in pension finance by launching China's first pilot platform for pension institution deposit supervision—the "Chongqing Notary Office Fund Supervision Platform"—in collaboration with the Chongqing Notary Public Office and BOCOM Fintech. The platform integrates systems from the notary, the Bank, and the service providers, effectively addressing shortcomings in traditional fund supervision models. The innovative online escrow notarization model resolves common challenges in pre-paid consumption scenarios, such as businesses shutting down, difficulty in refunding, and complex evidence collection. It allows consumers to track the use of their prepaid

funds in real time, alleviating concerns over pre-paid funds and enhancing confidence in service providers.



launching China's first pilot platform for pension institution deposit supervision

3.5.3 Improving the Quality and Efficiency of Livelihood Services

In 2024, BoCom cooperated with local culture and tourism units in Inner Mongolia, Shanghai, Guangxi, Shanxi, Jilin and other regions to initiate a promotional campaign entitled "Culture and Tourism Gala: The Travel City of My Heart." In addition to promoting tourism destinations, the Bank has launched a variety of tourism financial services that are thoughtful, practical, and convenient. These services are designed to support the development of the culture and tourism industry with the Bank's financial strength.

To take advantage of its Group synergy, Bocom organized the local branches to collaborate with local governments, enterprises, merchants, and other stakeholders of the culture and tourism industry. By pooling resources from all these sectors, the Bank rolled out a series of programs to benefit the general public, including convenient payments, ticket discounts, and consumer credit support. With such ongoing efforts, BoCom is promoting the in-depth integration and coordinated development of financial services and the culture and tourism industry, with the goal of building a more inclusive, open, and sustainable financial service ecosystem for the culture and tourism sector.



BoCom cooperated with Xinhuanet to launch a series of promotional videos for "Culture and Tourism Gala"



Jilin's "Culture and Tourism Gala" entered Shanghai

The Bank has renewed its personal loan brand, "Jiaoyin Hui Loan", with a strong focus on delivering benefits to every customer through an upgraded product portfolio and service processes. By establishing a digitalized comprehensive credit model, we have enabled one-time application, authorization, and credit inquiry, and provided customers with one-stop credit solutions across consumption, business, and auto financing, among others. We offer a full range of credit services under diverse scenarios, such as housing, daily consumption, vehicle purchases, travel, entrepreneurship, and agricultural production, reinforcing our commitment to inclusive finance for the people.

Case: Hunan Branch launches the innovative "Elevator Loan" to help upgrade old urban areas

To address funding challenges for elevator installation in old urban areas, the Hunan Branch launched the innovative "Elevator Loan" in 2024. This is BoCom's first credit loan, specifically for elevator installation. It offers flexible credit limits tailored to the financial needs of different places, easing the burden of one-time payments for residents. By making elevator installation more accessible, the product helps ensure that elderly residents, people with disabilities, and other physically challenged groups can easily access the upper floors. The first elevator loan of RMB 74,000 was successfully issued in Shaodong City, significantly improving residents' mobility and overall quality of life.

"BoCom's elevator loan has solved our one-time funding issue for elevator installation and helped us press the 'fast forward button' for safer, more convenient travel."

Mr. Liu from Shaodong



Clients exchange damaged and burned banknotes at BoCom counters.

3.6 Innovating Digital Finance

The Bank leverages the dual-driving forces of digital technology and data elements to steadily develop a new digital BoCom and digital finance. We aim to enhance the accessibility and competitiveness of our financial services, and share the benefits of the digital era with customers.

3.6.1 Upholding Scientific and Technological Ethics

Upholding the principles of "technology for good and data as a driver of equality", the Bank strictly adheres to the *Guidelines on Ethics in Science and Technology in the Financial Sector*. We have established internal policies, including the *Interim Measures of BoCom for Model Risk Management* and the *Measures of BoCom for Data Security*, to define ethical standards in technological innovation and data use. During the 2024 China Fintech Week, the Bank launched the feature "Ethics as the Basis, Data as the Guide" across its online channels, including the official website, mobile banking platform, and WeChat official account, to promote awareness of Fintech ethics. Throughout the reporting period, the Bank recorded no violation of Fintech ethics.

3.6.2 Pursuing Innovation-Driven Development

The Bank proactively embraces the wave of the digital economy and enhances the quality and efficiency of financial services that align with the digital economy through technological innovation. We are committed to accelerating the development of new quality productive forces while strengthening our core competitiveness and expanding our influence.

3.6.2.1 Governance

The Bank has established the Leading Group for Digital Transformation and the Digital Finance Committee to strengthen the decision-making and organizational coordination of major

matters regarding digital transformation and digital finance. The Digital Finance Committee is responsible for reviewing and finalizing new product catalogs and deciding over major issues of key innovation projects and new products throughout their lifecycle. Additionally, we have established the Fintech and Product Innovation Committee to oversee the product innovation and evaluation of corporate, retail, and interbank businesses. In accordance with the *Measures of BoCom for Intellectual Property Management*, we actively protect and manage the Bank's intellectual property and ensure respect for and prevention of infringement on others' intellectual property rights.

3.6.2.2 Strategy

The Bank regards the development of a new digital BoCom as a key strategic breakthrough. Following a consistent long-term blueprint, we have steadily implemented plans such as the *Fintech Development Plan of BoCom for the 14th Five-Year Plan Period (2021-2025)* and the *Action Plan of BoCom for Digital Finance (2024-2025)*. We are committed to fostering new business drivers, building new digital infrastructure, and shaping a new governance framework while accelerating the development of our new advantages in digital finance. By harnessing cutting-edge technologies such as blockchain, quantum computing, and digital twins, we are striving for innovation-led business growth, delivering more convenient, efficient, and personalized financial services.

Innovative applications of digital technology

Innovating digital technology	<ul style="list-style-type: none"> ● We have explored the digital twin technology to simulate physical outlets and business processes, providing valuable insights for operational decision-making. ● We have accelerated the 5G deployment across business areas and explored 6G applications in AI and edge computing.
Expanding application scenarios	<ul style="list-style-type: none"> ● We have integrated with major government blockchain scenarios such as Shanghai Pujiang Digital Chain, Xiongan Blockchain, and Pearl River Delta Credit Chain, strengthening our competence in diverse blockchain integration and cross-chain management. ● By enhancing cooperation with governments, financial institutions, and enterprises, we have extended application scenarios to include digital cities, e-government affairs, and inclusive finance, among others.
Unlocking the potential of data	<ul style="list-style-type: none"> ● We have leveraged the business value of enterprise-level privacy computing platforms by strengthening data collaboration and sharing the value of data elements with the National Development and Reform Commission (NDRC), data element markets, and local government affairs platforms. We have also

	<p>promoted research on privacy computing standards for the financial industry.</p> <ul style="list-style-type: none"> ● We have actively carried out quantum computing research, and applied research results to value estimation, trend prediction, portfolio optimization, and decision analysis. ● We have conducted research on security against quantum attacks, and promoted algorithm trials and pilot programs in quantum communication based on post-quantum cryptographic algorithms and quantum key distribution technology.
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Honors and Awards:

Four technological achievements won the PBOC Fintech Development Awards, among which the enterprise-level comprehensive risk management project based on full-domain AI technology won the first prize.

We obtained the Data Management Capability Maturity Assessment Model (DCMM) Level-5 Certification.

3.6.2.3 Management of Impacts, Risks, and Opportunities

The Bank has established internal policies, including the *Management Measures of BoCom for Fintech Innovation Laboratories* and the *Management Measures of BoCom for Cooperative and Innovative Procurement Methods*, to progressively enhance the Fintech innovation management system and drive the application of Fintech innovation outcomes.

Fintech innovation management mechanism

Strengthening lab management	We have managed the development and operation of Fintech innovation laboratories in a systematic manner, and pooled resources to strengthen our capabilities in cutting-edge technology research and breakthroughs.
Innovate supplier partnerships	We have invited suppliers to collaborate on R&D and share the associated risks, further reinforcing our foundational and cutting-edge Fintech research.

3.6.2.4 Indicators and Targets

As of the end of the reporting period, the Bank's IT investment totaled RMB 11,430.63 million. Our patents totaled 591, including 272 pending and 319 granted patents, of which 263 were valid.

3.6.3 Expediting Digital Operations

The Bank has built an integrated financial service system that combines online and offline channels for intelligent and convenient services. By placing digital transformation at the core, we

have continuously empowered business development and effectively expanded the reach of our financial services.

Digital finance services

Upgrading online service channels	We have introduced version 9.0 of our mobile banking app for improved inclusivity, simplicity, and usability. This new version enhances customer experience across four key areas with wealth management, inclusive finance, customer rights and benefits, and convenience.
Strengthening the "Cloud BoCom" brand	By creatively leveraging AI and audio-video technologies, we have launched the "Cloud BoCom" digital service brand and brought online the branches, employees, services, and products for remote video assistance in financial businesses. As of the end of the reporting period, "Cloud BoCom" was accessible across channels, including our mobile banking app, WeChat mini-program, WeChat banking, and smart displays.
Creating a cloud-based financial ecosystem	We have released a cloud-based financial ecosystem platform with a range of out-of-the-box "industry + finance" software as a service (SaaS) financial solutions tailored to key scenarios and industries, contributing to a service matrix for the cloud-based financial ecosystem.

Key Performance Highlights:

As of the end of the reporting period, personal mobile banking customers reached 133,448,500; BoCom WeChat mini-program users grew to 48,673,100, compared with the start of the year increasing by 33.64%; Cloud Manager users rose to 9,784,700, compared with the start of the year increasing by 31.92%.

Honors and Awards:

"Cloud BoCom" received the Winning Prize at the 18th "Zhenxing Cup" National Youth Vocational Skills Competition by the Central Committee of the Communist Youth League of China, recognition as one of the Top 10 Innovative Achievements in China's Digital Inclusive Finance in 2023 by the China Institute of Communications, and selection as a 2024 AI Large Model Financial Demonstration Scenario and Innovative Application Case by the Joint Laboratory for Innovative Supervision of the Shanghai Fintech Industry Alliance.

3.6.4 Innovative Applications of e-CNY

As a pilot e-CNY operator, the Bank has accelerated relevant product innovation and ecosystem development. We have achieved significant digital milestones across various fields and launched a number of industry-first initiatives, products, and cases, thus establishing BoCom as an industry model for digital ecosystem development.

Innovative applications of e-CNY

- The Bank has continuously expanded e-CNY application in the transportation sector. We have pioneered the Shanghai public transportation QR code, enabling seamless travel across the city's transit network with a single QR code.
- As an early participant in the Hong Kong e-CNY pilot program, we have integrated our e-CNY wallet system with Hong Kong's Faster Payment System, offering BoCom wallet services to local residents.
- The Bank has launched the industry's first visual e-CNY hardware wallet in the Guangdong-Hong Kong-Macao Greater Bay Area. With an e-ink screen that dynamically displays QR codes on the card surface, the hardware wallet is innovatively touchable and scannable.
- Capitalizing on the opportunities presented by the e-CNY reform, the Bank has partnered with Zhejiang E-Commerce Bank, Alipay, and Meituan to introduce the industry's first "e-CNY Festival", a monthly marketing campaign starting on the 16th of each month.
- Leveraging the targeted payment capabilities of e-CNY smart contracts, the Bank has developed a tailored inclusive loan solution for Luzhou Laojiao, a distilleries company. This pioneering solution enables online loan application, review, disbursement, and targeted allocation, ensuring a closed-loop circulation of credit funds with verifiable usage, thereby enhancing the convenience and accessibility of inclusive finance.

Case: E-CNY-based public transit fully rolls out in Shanghai

Building on the success of China's first e-CNY transportation code, which has already been implemented in the metro systems of Hangzhou, Shaoxing, and Haining, the Bank has partnered with Shanghai Public Transport Card Co., Ltd. and launched the BoCom e-CNY Transportation Code on June 28, 2024. Users can access the code on the e-CNY app by navigating to "Services - Transportation Code - BoCom Transportation Code mini-program". This initiative enables seamless, one-code travel across all transportation modes in Shanghai, including buses, ferries, metro, maglev trains, airport shuttles, the Songjiang tram, and the Jinshan Railway, representing an upgrade in intercity and multimodal transit system. By highlighting the public and inclusive nature of e-CNY, the initiative accelerates e-CNY's integration into everyday life and drives the

expansion of its diverse applications. The BoCom e-CNY Transportation Code solution received a number of recognitions, including the "2024 Outstanding Case of Digital Inclusive Finance – Together for Enterprises" from the Ministry of Industry and Information Technology of China, the "2024 Innovative Practices Case for Building a Financial Powerhouse" from People's Daily Online, the "Excellent Achievement Awards for Empowering New Quality Productive Forces in Shanghai's Financial Sector" from the Shanghai Financial Association, and the "First Prize of Excellent e-CNY Application Cases in Zhejiang Province" from the Joint Office for the Leading Group of the Zhejiang e-CNY Pilot Program.



Official launch of Shanghai e-CNY Public Transportation QR Code

4 Environment: Empowering Ecological Civilization

Embracing Sustainable Development Trends

Green finance is a cornerstone of China's vision for a more sustainable future. In 2024, the Bank remained deeply committed to the New Development Philosophy, strengthening its position in green finance and advancing the development of a comprehensive green finance ecosystem. We continuously expanded and diversified our portfolio of green financial products and services, significantly enhancing our expertise in this field. At the same time, we accelerated the transition toward greener, low-carbon operations. Through these efforts, we played a key role in advancing the Beautiful China Initiative by driving the high-quality growth of green finance.

Aligning with SDGs



Our actions

Addressing climate change; Advancing green finance; Maintaining green and low-carbon operations

Our performance

Under PBOC's standards, our green loan balance reached RMB 892.608 billion, up RMB 70.566 billion or 8.58% year-on-year. Notably, the balance of loans supporting the clean energy sector grew by RMB 63.313 billion or 30.85% year-on-year to RMB 268.565 billion.

4.1 Empowering Low-Carbon and Green Development Through Finance

The Bank is committed to the New Development Philosophy. It makes green finance a long-term strategic priority, continuously enhancing and expanding its green financial services. In response to the pressing challenges of global climate change, we intensify efforts to optimize climate risk management in financial decision-making, drive innovation in green financial products and services, and deepen international exchange and collaboration. Through these efforts, we aim to foster the sustained and robust growth of green finance.

4.1.1 Addressing Climate Change

The Bank actively responds to climate change and fully supports the national carbon peaking and carbon neutrality ("dual carbon") strategy. We have established a comprehensive climate risk governance framework and developed a "2+N" green finance system—comprising two overarching policy frameworks and a range of specialized green finance initiatives. By incorporating climate risk into our comprehensive risk management framework, we take a holistic and thorough approach to climate governance. Additionally, the Bank is a supporting institution of the Task Force on Climate-Related Financial Disclosures (TCFD) and has been awarded the Partnership for Early Awareness of Sustainability-Disclosure Today (P4EAST) by the International Sustainability Standards Board (ISSB).

4.1.1.1 Governance

Governance Structure

The Board serves as the highest decision-making authority for the Bank's ESG and green finance efforts. Under the Board, the Risk Management and Related-Party Transactions Control Committee is responsible for overseeing climate and environmental risks and opportunities, ensuring the effective implementation of climate and environmental risk reporting mechanisms, and integrating climate risk factors 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 performance, reviewing its green finance strategies and objectives, and promoting sustainability principles such as resource conservation, low-carbon operations, environmental protection, and sustainable development across the Bank. In 2024, upon approval of the Board, the Bank released its first dedicated Environmental Information Report, providing a comprehensive overview of its efforts in promoting green finance, enhancing climate risk management, and supporting the low-carbon transition of the real economy.

The Senior Management is responsible for formulating development strategies and objectives, defining departmental roles and responsibilities, and conducting internal controls, inspections, assessments, and evaluations. It regularly reports to the Social Responsibility (Environmental, Social, and Governance) and Consumer Protection Committee on the progress of green finance initiatives and ensures timely submissions to regulatory authorities in compliance with reporting

requirements.

The Green Finance Development Committee is a permanent institute of deliberative coordination in business management at the Head Office. It makes decisions and formulates plans for major policies, systems, and key issues related to the Group's green finance strategy. The committee plays an active role in establishing and refining the "Four Mechanisms" (for green finance policy research and dissemination, green finance innovation and development, green finance resource allocation and support, and green finance performance assessment and evaluation) and "Five Systems" (for green finance corporate governance, green finance risk management, green finance data governance, green finance talent development, and green operations and information disclosure) to enhance the Bank's green finance capabilities. Key responsibilities of the committee include: reviewing and approving the Group's major green finance plans, strategies, objectives, policies, and frameworks. It also oversees the development and implementation of institutional mechanisms for green finance, providing guidance and supervision for related entities to ensure alignment with the Bank's broader green finance business development and innovation goals.

Organizational structure of the Green Finance Development Committee:

Chair: President of the Bank

Vice-chairs: Vice President in charge of credit and risk , Vice President in charge of corporate business, Vice President in charge of retail business and Chief Risk Officer

Members: Heads of various departments of the Head Office

(The office of the Green Finance Development Committee is located in the Credit Department of the Head Office.)

Organizational structure of the Green Finance Development Committee:

Investment Policy and Structural Adjustment Task Force: It is responsible for establishing a green finance policy research and dissemination framework, ensuring alignment with national policies on "dual carbon" goals and green development. It swiftly responds to state requirements and incorporates them into the Bank's internal policies and frameworks by developing new regulations and refining existing ones. Additionally, it standardizes green finance data governance (including the integration of external data), builds supporting systems, and drives the ongoing optimization of the credit structure in line with green finance principles.

"Dual Carbon" Task Force: It develops and enhances the green finance risk management framework within the context of "dual carbon" goals. It focuses on advancing carbon peaking and carbon neutrality strategies both through the Bank's asset portfolios and within its own operations. The task force also conducts environmental and climate risk stress testing and ensures the timely disclosure of relevant environmental and climate-related information.

Corporate Business Task Force: It drives innovation in business operations, products, models, and processes within corporate green finance, which covers credit, non-credit, and debt investment for large enterprises and inclusive small businesses. Additionally, it leads efforts to ensure compliance with the regulator's quantitative assessment requirements for green finance.

Retail Business Task Force: It is responsible for advancing innovation in business operations, products, models, and processes within retail green finance, which covers personal banking, credit cards, and personal business loans. Additionally, it leads efforts to ensure compliance with the regulator's quantitative assessment requirements for green finance.

Resource Support Task Force: It provides organizational, human, financial, and training resources to support the development of green finance. It also assists in the related performance evaluations.

Training Mechanism

The Bank actively promotes green finance training and talent development, establishing a specialized team of green finance professionals. We regularly conduct training programs, including specialized courses on green finance expertise and case studies. To facilitate continuous learning, we have built an internal learning platform and included green finance courses in the "Corporate Banking Lecture Series", "Weekly Learning Sessions" and other training programs. Additionally, the e-Campus platform provides access to learning materials on green finance and climate risk management, including courses, presentations, and product manuals. Beyond classroom instruction, we also provide hands-on experience through practical learning opportunities. As part of the "Elite Professionals" program, top-performing trainees from various branches gain on-the-job experience at the Head Office, where they receive direct exposure to green finance operations. Furthermore, we take a systematic and forward-looking approach to developing talent within the Bank's risk management function, combining structured training,

project-based learning, job rotations, innovation competitions, and performance-driven incentives to build a capable and future-ready workforce.

Remuneration Mechanism

The Bank has incorporated green finance-related metrics into the performance evaluation system for key management personnel, directly linking assessment results to compensation. We have also integrated green finance development and climate risk management requirements into the performance appraisal framework for our business units. By introducing quantitative indicators—such as the share of green finance in overall operations and the value creation directly attributable to green finance—we have enhanced our green finance performance metrics to drive product innovation, strengthen business differentiation, and foster industry collaboration.

4.1.1.2 Strategy

The Bank attaches great importance to managing climate-related financial risks, embedding green finance as a foundational element of the Group-wide business strategy and operations. We have integrated climate risk into our comprehensive risk management framework, supporting the growth of green finance and facilitating the national "dual carbon" strategy through high-quality development.

Guided by Xi Jinping Thought on Socialism with Chinese Characteristics for a New Era, the Bank is deeply aligned with China's "dual carbon" goals, closely monitoring their progress and implementation. Considering our own development needs, we have set clear objectives and key priorities for advancing green finance in support of carbon peaking and carbon neutrality. Our strategy includes 16 specific actions, such as optimizing our credit structure and facilitating the green and low-carbon transition of the energy mix. In addition, we have established a three-phase roadmap with milestones set for 2025, 2030, and 2060.

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 seamlessly integrated across our four key business areas to ensure a balanced approach to business growth, quality, and efficiency. First, our credit policies and guidelines have been refined and differentiated, enabling us to precisely serve strategically important industries, regions, and customer segments. Second, we have strengthened

the alignment between our financial mechanisms—including credit resource allocation, approval authority and processes, risk measurement, and pricing—and national strategic priorities. Third, we have optimized risk management practices across these core business areas, significantly strengthening our non-performing asset management and value creation capabilities. Fourth, our key asset quality indicators in the Yangtze River Delta outperform those of our peers, setting a benchmark for innovative risk management mechanisms and solutions to complex challenges. This success serves as a model to drive the Bank's broader coordinated development.

The *Risk Management Plan of Bank of Communications Co., Ltd. for the 14th Five-Year Plan Period (2021-2025)* calls for the continued enhancement of climate and environmental risk management. First, it requires the Bank to establish and refine the "Four Mechanisms" and "Five Systems" of green finance. This includes strengthening the green finance policy framework to ensure effective implementation, driving innovation in carbon finance products and services, allocating resources to support the expansion of green finance, and developing a comprehensive performance assessment system. The Bank should also leverage the leadership of the Social Responsibility (Environmental, Social, and Governance) and Consumer Protection Committee as well as the Green Finance Development Committee to reinforce risk management in green finance, establish unified data standards for green credit, and improve the framework for green operations and ESG disclosures. Second, the Bank should incorporate climate and environmental risks into its comprehensive risk management framework. This involves continuously assessing the impact of climate and environmental risks on the Bank's overall operations and management. The Bank should also develop a carbon emission (or carbon footprint) measurement system, explore qualitative and quantitative methodologies for climate and environmental risk analysis, and gradually implement climate and environmental risk disclosures. Additionally, efforts should be made to strengthen the data infrastructure for climate and environmental risks by establishing a dedicated risk database.

The Bank has established a comprehensive "2+N" green finance policy framework. 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 policies provide strategic guidance for advancing high-quality green finance development and supporting China's "dual carbon" strategy. The "N" represents a series of

specialized policies covering various aspects of green finance, including organizational structure, business management, facility, sector-specific guidelines, product integration, approval policies, and performance evaluation.

In addition, the Bank has developed and implemented targeted resource allocation programs to support the development of key regions, including green finance reform zones, pilot areas for climate investment and financing, and western China. We have expanded green credit investments to drive the growth of green finance in these regions and accelerate the green transition of local economies. In 2024, the Bank continued its self-assessment of green banking initiatives and was recognized by the CBA as a Model Organization in Green Banking.

4.1.1.3 Management of Impacts, Risks, and Opportunities

Risk Management System

The Bank prioritizes climate-related financial risk management, positioning green finance as a core pillar of the Group's operations and strategic growth. Climate risks are deeply embedded in our comprehensive risk management framework, particularly in the evaluation of new products and business initiatives. These risks are also integrated into our credit management processes. To enhance oversight, we have established climate and environmental risk scoring metrics within our risk assessment framework and incorporated green credit reviews and corrective measures into internal control evaluations. Additionally, we provide regular training programs on climate and environmental risk management. The Bank remains committed to advancing green finance, driving sustainable development through a robust risk management system, and supporting the national "dual carbon" strategy with high-quality growth.

Three lines of defense for climate risk management in specialized departments

The first line of defense consists of front-office business departments, which are responsible for identifying and assessing climate-related risks associated with green finance products and services. They ensure that business activities comply with climate risk management policies and are conducted sustainably.

The second line of defense comprises the risk management departments, which regulate, oversee, and guide climate risk management activities within the first line. They are responsible for developing and implementing climate risk management policies, procedures,

and standards, establishing climate risk management indicators within the Group's risk appetite framework, and guiding subsidiaries in integrating climate risk into their own risk appetite systems. They also continuously monitor, assess, and report on climate risk developments across business units, ensuring that the Bank's climate risk management policies comprehensively cover all green finance activities and remain aligned with international best practices. In addition, the risk management departments take a balanced approach to pollution control, carbon reduction, and financial stability, avoiding excessive risk aversion and supporting a smooth and controlled transition to low-carbon operations.

The third line of defense consists of internal audit departments, which operate independently from the first two lines. They are 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.

Risk Management Process

The Bank has fully integrated ESG risk management into its business processes, ensuring the effective implementation of the three lines of defense in risk management.

1. Client screening: ESG risks are a key consideration when evaluating clients and projects. The Bank applies a "one-vote veto" system for onboarding new clients based on their ESG risks and strictly restricts funding access for high-pollution, high-emission projects. Additionally, we strictly manage credit exposure for existing clients with significant ESG risks.

2. Due diligence and credit review & approval: Clients' ESG performance is a critical factor in due diligence and credit approval. The Bank conducts comprehensive, multi-channel assessments of ESG risks and compliance of clients and their projects. This includes, but is not limited to, evaluating their ESG risk management frameworks and assessment systems, labor conditions and workplace standards, as well as pollution prevention and control measures. We prioritize projects that promote green, low-carbon, and circular economies while limiting credit and investment exposure to high-carbon industries.

3. Contract management and fund disbursement management: We incorporate dedicated ESG clauses in contracts, requiring client to strengthen ESG risk management. The Bank evaluates clients' ESG risks as a key criterion in determining loan disbursements.

4. Post-lending management and risk mitigation: The Bank integrates ESG risk monitoring into post-lending management. If significant ESG risks are identified, we proactively initiate dynamic assessments and implement targeted measures for high-risk clients. For those with

potentially significant ESG risks, we take timely action to reduce exposure and gradually exit business relationships.

5. Management of projects outside the Chinese mainland: For proposed financing projects outside the Chinese mainland that raise significant ESG concerns, the Bank engages an independent, qualified third party to evaluate and inspect ESG risks before approving financing. The assessment and inspection reports are made publicly available to ensure transparency.

Climate Change: Risk and Opportunity Analysis

Category	Specific Risk		Potential Financial Implication	Scope and Duration of Impact
Physical risks	Acute risks	Extreme weather events (e.g., severe heat waves, floods, blizzards, and droughts)	Production and supply chain disruptions and rising operating costs	Short-term: Sharp increases in production costs and fluctuations in the value of high-risk assets
				Medium- and long-term: A growing proportion of high-risk assets and exacerbated financial pressure
	Chronic risks	Environmental pollution (e.g., soil, air, water, and marine pollution, as well as environmental accidents)	Higher production costs and rising insurance premiums for high-risk assets	Medium- and long-term: Damage to equipment and increased risk of asset impairment
				Long-term: High environmental remediation costs and compromised corporate sustainability
		Geographic changes caused by long-term climate shifts	Persistent increases in production costs and insurance premiums for high-risk assets	Medium- and long-term: More frequent health issues and reduced workforce productivity

		(e.g., rising sea levels, shifting monsoon belts, and melting glaciers)		Long-term: Higher disease transmission risks and rising business operating costs
		Destruction and scarcity of natural resources (e.g., desertification of arable land and freshwater shortages)	Declining revenues and rising insurance premiums for high-risk assets	Short-, medium-, and long-term: Adverse effects on the labor force and reduced overall business efficiency
Transition risks	Laws and policies: Governments tighten restrictions on high-carbon industries, introducing carbon trading mechanisms to incentivize GHG emission reductions, limiting the use of carbon-intensive and inefficient energy sources, strengthening environmental law enforcement, levying and raising environmental taxes, and promoting sustainable land-use policies.		Disruptions to production and rising environmental remediation costs	Short-, medium-, and long-term: Premature asset retirement, increased asset impairment, and higher operating costs
	Technologies: Breakthroughs in renewable energy, production efficiency, 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".		Production disruptions and increased spending on research and development (R&D)	Medium- to long-term: Premature retirement of existing assets and declining demand for affected products and services
	Markets:		Declining revenues and	Short-, medium-,

	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.	shrinking market share	and long-term: Rising financing challenges, increased market uncertainty, surging raw material costs, and fluctuations in asset valuations
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Note: "Short-term" refers to the next 1-3 years, "medium-term" refers to the next 3-5 years, and "long-term" refers to the next 5-10 years.

Opportunities in Climate Change	
<ul style="list-style-type: none"> ● Research indicates that China will require hundreds of trillions of yuan in climate-related funding to achieve its "dual carbon" goals. This presents significant growth opportunities for commercial banks in green and transition finance. ● Innovations in carbon finance products are creating new opportunities for financial institutions. In recent years, both traditional financial products aimed at emission reduction and carbon permit-backed instruments have seen rapid growth. 	

Transmission Pathways of Climate Risk Impact on the Bank

Risk Category	Risk Description	Impact of Climate Change	Scope of Impact
Credit risks	Losses incurred by the Bank when borrowers or counterparties fail to meet their contractual obligations	Natural disasters and climate shifts may reduce borrowers' profitability, devalue assets, and lower the value of collateral. Additionally, borrowers who fail to adapt to changing laws, regulations, policies, or technologies may face operational challenges that affect their long-term viability.	Medium- and long-term
Market risks	Losses arising from adverse changes in market prices, including interest rates, exchange rates, stock prices, and commodity prices, affecting both on-balance-sheet and off-balance-sheet	Extreme climate events or a sudden market shift may cause abrupt fluctuations in asset valuations.	Medium- and long-term

	activities of the Bank		
Liquidity risks	The inability to secure sufficient funding at a reasonable cost, affecting the Bank's ability to repay maturing debt, meet payment obligations, or maintain regular business operations	Physical and transition risks could weaken the balance sheets of financial institutions heavily exposed to carbon-intensive assets. Banks that fail to implement effective climate risk management may face diminished investor confidence, leading to fundraising challenges.	Medium- and long-term
Operational risks	Losses incurred by the Bank due to flawed or inadequate internal processes, personnel, IT systems, or external events. This includes legal risks but excludes strategic and reputational risks.	Natural disasters and climate change may directly damage bank offices, branches, and data centers, or disrupt critical financial infrastructure, leading to business interruptions for commercial banks.	Medium- and long-term
Reputational risks	Negative perceptions from stakeholders, the public, or media due to corporate actions, employee misconduct, or external events can harm the Bank's brand value, disrupt normal operations, and even impact market and social stability.	Financial institutions that directly or indirectly contribute to climate change—or fail to implement effective climate strategies for themselves and their clients—may face negative public scrutiny, reputational damage, and adverse effects on business growth and market valuation.	Short-, medium-, and long-term

Climate Risk Stress Testing

Test Area	Test Result
The Bank has been conducting climate risk sensitivity stress tests since 2021 for high-carbon industries, including electricity, steel, building materials, non-ferrous metal smelting, civil aviation, petrochemicals, chemicals, and paper-making. These tests assess the potential impact of China's low-carbon transition on the Bank's asset quality.	The results indicate that credit risk increased for clients in the eight high-carbon industries under stress scenarios. However, the overall risk remains manageable, with a limited impact on the Bank's capital adequacy ratio.
The Bank conducted a quantitative study on the impact of the EU's Carbon Border	The results show that credit risk increased for clients in the affected industries under stress

Adjustment Mechanism (CBAM) and carried out specialized stress tests for key clients in the steel and aluminum industries. These tests analyze the potential impact of CBAM's formal implementation on the quality of the Bank's credit assets.	scenarios. However, the overall risk remains under control, with minimal impact on the Bank.
The Bank performed a stress test on the aviation industry, which may be impacted by the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) in the future. The analysis incorporates energy policies related to aviation's transition and carbon price fluctuations to estimate loss coefficients for China's aviation sector under stress scenarios. This data was used to assess the potential impact on the asset quality of BoCom's aviation clients.	The results show that related transition risks have a limited impact on the Bank's aviation assets.

Analysis of Climate Risk Scenarios

Transition scenarios: Using the Energy Policy Simulator (EPS) model, the Bank simulates potential future changes in key financial indicators of its corporate clients, including operating income, energy costs, carbon emissions expenses, fixed asset investments, and asset impairments. These projections align with a carbon reduction pathway consistent with the *Paris Agreement* and China's "dual carbon" goals. The analysis then assesses BoCom's ability to maintain stable operations under these transition scenarios. The results indicate that the transition presents a manageable risk for the Bank.

Physical scenarios: The Bank leverages a climate coupling model developed by external research institutions to assess the potential impact of future acute and chronic climate disasters on asset quality in key regions and industries. Specifically, the Bank has developed a physical risk early-warning model to identify potential threats posed by acute meteorological events (e.g., floods, typhoons) based on their frequency, severity, and geographic distribution of vulnerable assets. The Bank has also assessed the long-term impact of climate creep on agriculture and hydropower, as well as indirect losses from acute climate disasters affecting the real estate and transportation sectors. The results indicate that these physical risks have a limited impact on the Bank.

4.1.1.4 Indicators and Targets

We have formulated and issued the *Action Plan of BoCom for Carbon Peaking and Carbon*

Neutrality Goals, aligning closely with China's "dual carbon" goals and implementation roadmap while considering the Bank's strategic development needs.

Referring to both domestic and international standards and industry best practices, we have also introduced the *Management Measures of BoCom for Carbon Emissions of Investment and Financing Clients*. This framework establishes the governance structure and role assignments for managing client carbon emissions and standardizes measurement workflows, estimation methodologies, and application scenarios. It also implements a tiered classification system for carbon emission measurements based on data source reliability, ensuring high-quality data to support climate scenario analysis, stress testing, the Group's green transition, and regulatory disclosures.

Since 2021, we have been measuring carbon emissions of investment and financing clients in carbon-intensive industries. In the latest assessment, we conducted Scope 1 and Scope 2 emissions measurements for eight major carbon-intensive sectors—thermal power, steel, building materials, non-ferrous metals, petrochemicals, chemicals, aviation, and paper-making—as well as the transportation industry. Additionally, we measured Scope 3 emissions for the mining sector. These efforts aim to improve the coverage and granularity of carbon data.

Milestones for the 14th Five-Year Plan Period:

By 2025, we aim to achieve significant progress in green finance branding and product innovation. Our green finance framework and mechanisms will play a substantial role, with green and low-carbon principles fully integrated into all aspects of our operations and management—demonstrating our strengthened commitment and proactive approach to supporting carbon peaking and carbon neutrality.

The total balance of green loans will be no less than RMB 800 billion, with a target of RMB 1 trillion.

The proportion of green loans in the Bank's total corporate lending portfolio on the Chinese mainland is set to increase by at least 5 percentage points from 11.31% at the end of 2020 (the final year of the 13th Five-Year Plan), with a target of reaching a 10 percentage point increase.

Highlight: Quantitative measurement of environmental impact in investment and financing

We have formulated and issued the *Management Measures of BoCom for Carbon Emissions of Investment and Financing Clients*, establishing a structured governance framework with clear

role assignments for overseeing client carbon emissions. By referencing domestic and international standards, we have standardized emission measurement workflows, estimation methodologies, and application scenarios. Additionally, a tiered classification system has been implemented based on data source reliability, ensuring high-quality data to support climate scenario analysis, stress testing, Group-wide green transition, and regulatory disclosures.

Moreover, the Bank refers to the PBOC's *Technical Guidelines on Carbon Accounting for Financial Institutions (Trial)* to quantify carbon emissions attributed to the Bank's investment and financing activities (i.e., emissions resulting from projects and entities supported by the Bank's funding). This assessment is based on carbon emission data from key industry clients, enabling us to calculate the Bank's average asset carbon intensity, which represents the equivalent carbon emissions per unit of the Bank's average capital.

4.1.2 Actively Advancing Green Finance

The Bank places great importance on green finance, continuously strengthening its governance and policy framework in this area. By prioritizing key industries and regions, we are expanding our green finance support for the real economy, ensuring that clients across various sectors can access tailored financial solutions for green investment and financing, sustainable consumption, and low-carbon transition. By expanding the depth and impact of our green finance initiatives, we help clients generate greater economic value—ensuring that sustainability and profitability grow together.

4.1.2.1 Green Credit

During the reporting period, we formulated and issued the *Action Plan of BoCom for Green Finance (2024-2025)*, outlining four key goals, eight strategic priorities, and 30 targeted initiatives to accelerate our green finance development. We also updated and refined six specialized credit guidelines, covering the entire industry chains of photovoltaics (PV), wind energy, smart grid infrastructure, energy storage solutions, and hydrogen energy, as well as the green and low-carbon transition of industrial sectors. Structured support was provided for key industries such as energy, manufacturing, urban and rural development, and transportation, which are essential to achieving China's dual carbon goals. Moreover, we took a balanced approach, actively facilitating the low-

carbon transition of traditional industries while applying measured restrictions on the expansion of high-emission sectors. We introduced customized, innovative financial products, including "carbon intensity- and ESG-linked" transition loans, ESG sustainability-linked loans, and ESG Smart Manufacturing Loan, to drive the high-quality growth of our green finance business.

Eight strategic priorities

Thoroughly implementing the green finance strategy

Vigorously supporting green and low-carbon development in key areas

Continuously deepening green finance innovation

Building a green finance brand

Enhancing digital capabilities in green finance

Strengthening organizational structure and talent development for green finance

Reinforcing green finance risk management

Deepening exchange and cooperation in green finance

Case: BoCom implements Zhejiang's first "carbon intensity- and ESG-linked" transition loan

Nanxun District in Huzhou, Zhejiang—renowned as the "land of fish, rice, and silk"—is one of China's major grain-producing regions. In recent years, while its aquaculture industry has experienced rapid growth, it has also faced challenges such as environmental pollution, ecological degradation, and product quality concerns. To support sustainable development in the region, BoCom Zhejiang Branch provided credit support to Huzhou Nanxun Qiangcun Fumin Group for the investment and construction of a digitalized green fisheries project. In line with the financing standards for agricultural transition, the branch leveraged its self-developed ESG evaluation system to create an innovative financing model that directly links the project's carbon intensity reduction and ESG performance to the loan's terms and conditions. This resulted in a customized "carbon intensity- and ESG-linked" low-carbon transition financing solution, under which a RMB 100 million loan was issued. This marked Zhejiang's first loan for agricultural transition and first transition finance loan to integrate both carbon intensity metrics and ESG evaluation into its structure.

Upon completion, the project is expected to conserve 8.5 million tonnes of water annually.

Additionally, through industrialized fish farming and smart digital innovation, it will inject new momentum into traditional fisheries, drive industrial upgrading, and contribute to the common prosperity of farmers and rural communities.

"The 'carbon intensity- and ESG-linked' transition loan has helped us save nearly RMB 300,000 in financial costs. It has also strengthened our motivation to enhance new-quality productive forces, reduce carbon emissions, and achieve sustainable development."

Zhu Fengming, Chairman of Nanxun Qiangcun Fumin Group



Nanxun, Huzhou, Zhejiang

Green credit management initiatives

Initiative	Description
Integrating ESG risks into project assessment, review, and approval workflows	Implement the "one-vote veto" system for green credit, strengthen credit fund allocation management and make clients' ESG risks a key factor in determining credit disbursement.
Incorporating client's ESG performance as a key factor in due diligence	Conduct preliminary ESG risk assessments based on due diligence; establish a dynamic evaluation mechanism; and embed the "Dynamic Evaluation Form of Clients' ESG Performance and Risk Control" into the system to continuously assess ESG performance and risk management.
Considering client's ESG performance as a critical element in credit risk assessment	Use clients' ESG risks as a critical criterion for credit disbursement decisions; restrict credit extension to clients with serious ESG violations or significant risks; monitor clients' ESG risks in post-lending management and initiate dynamic evaluations via credit memos when significant risks are detected. As a general rule, for clients rated "unsatisfactory", credit limit increases are prohibited until rectification is completed and formally approved.

Enhancing internal control and management of green credit	Integrate green credit policies, processes, and implementation oversight into internal audits and control reviews.
Optimizing environmental data management	Define internal application procedures for carbon emission reduction facility (CERF), ensuring alignment across teams to enhance application efficiency; disclose relevant information through public channels, including the Bank's official website, in compliance with regulatory requirements; and optimize the green credit classification system to further strengthen categorized management.
Strengthening ESG risk management for projects outside the Chinese mainland	Engage a qualified and independent third party to assess and inspect ESG risks for proposed financing projects outside the Chinese mainland that raise significant ESG concerns before approving financing, and publish the corresponding assessment and inspection reports.
Building specialized expertise in green finance	Launch the "Green Finance Practice" workplace competition to encourage employees' active participation in sustainable finance through research activities and hands-on learning opportunities; develop a multi-tiered training system with specialized courses tailored to different roles and expertise levels; and strengthen peer-to-peer exchanges to enhance resource sharing and knowledge transfer; expand the development of green-focused institutions. In 2024, 24 institutions from 19 branches were recognized as green finance leaders.
Strengthening internal control and management of green credit	<ul style="list-style-type: none"> ✓ Screen and classify green loans based on standardized criteria; enhance classified management of green finance through measures such as an early warning model for approval escalation, mid-term loan reviews, and targeted sampling inspections. ✓ Conduct regular self-assessments and independent audits of green credit by category to strictly prevent greenwashing; and refine green finance business processes by integrating smart monitoring solutions to mitigate greenwashing risks. ✓ Define the scope and emergency response procedures for major risk events—such as environmental pollution, ecological destruction, and natural disasters—in the <i>Notice of BoCom on Improving the Emergency Response Mechanism for Major Credit Risk Emergencies</i>, and integrate green credit policies, processes, and implementation oversight into internal audits and risk control inspections.

During the reporting period, the Bank continued to refine its credit policies to support the

green and low-carbon transition of industrial sectors. We developed differentiated entry standards for key industries such as steel and coal-fired power generation and introduced tailored credit policies and specialized service programs for sectors including shipping, steel, and coal-fired power generation.

Table: Industry-specific credit policies

Modern agriculture	<ul style="list-style-type: none"> ● Prioritize partnerships with large-scale agricultural enterprises that comply with environmental protection standards, meet food safety requirements, and maintain smooth production and sales processes, supporting their transition to green and low-carbon production. ● Continuously monitor and assess the impact of any changes in natural conditions, food safety regulations, and environmental requirements on business operations.
Carbon-intensive industries	<ul style="list-style-type: none"> ● Implement targeted management measures for key carbon-intensive sectors, including steel, coal, cement, electrolytic aluminum, and coking; establish clear evaluation criteria based on industry standards, energy efficiency, and environmental performance to optimize the structure of credit resources; direct new lending toward green and low-carbon transformation projects.
Metallic and non-metallic mining industries	<ul style="list-style-type: none"> ● Prioritize credit support for leading mining enterprises with strong resource reserves, economies of scale, integrated industrial chains, advanced extraction technologies, low fully-mechanized mining costs, strong environmental and safety standards, high comprehensive utilization rates, well-developed intelligent operations, and advanced management capabilities; accelerate the phase-out of small and medium-sized independent mining enterprises with limited resource sustainability, high operating costs, significant environmental and safety risks, major challenges in transformation and technological upgrades, and a continued decline in operational viability.
Oil and natural gas industry	<ul style="list-style-type: none"> ● Provide selective credit support for technological upgrades, new construction, and expansion projects that focus on green and low-carbon transition and energy efficiency improvements. ● Continue optimizing the credit structure by phasing out enterprises with outdated production technologies, inadequate investments in workplace safety, environmental protection, and emissions reduction.

Key Performance Highlights

As of the end of the reporting period, the balance of green loans stood at RMB 892.608 billion, marking an increase of RMB 70.566 billion, or 8.58%, from the beginning of the year. The growth rate of green loans surpassed that of all other loans in both RMB and foreign currencies.

After securing support from the CERF, the Bank has disbursed RMB 25.349 billion in PBOC-compliant carbon emission reduction loans across 494 projects. These loans, issued at a weighted average interest rate of 3.41%, have facilitated an annual reduction of 5.0627 million tonnes of CO2 equivalents.

Ecological and environmental loans amounted to RMB 49.761 billion, an increase of RMB 11.73 billion from the end of the previous year, representing a growth rate of 30.84%.

BoCom is fully committed to driving the green and low-carbon transition in key regions, with a particular focus on Shanghai's shipping sector. To accelerate this shift, we have developed the *Financial Service Plan of BoCom for the Green and Low-Carbon Transition of Shanghai's Shipping Industry Chain*, aimed at enhancing Shanghai's position as a leading international shipping hub through green and smart upgrades while expanding transition finance solutions for the shipping industry. In addition, BoCom has co-developed national transition finance standards for China's water transportation sector and organized themed seminars to advance 16 green transition initiatives for the entire shipping chain. These efforts reflect our active contribution to the sustainable development of the shipping industry.

Case: Shanghai Branch facilitates China's first transition finance loan for the water transport industry

Following the official implementation of the *Shanghai Transition Finance Catalogue (Trial)* ("Catalogue") and its guidelines on January 1, 2024, Shanghai Branch responded swiftly. Under the guidance of Shanghai financial regulators and the Head Office, the branch partnered with China COSCO SHIPPING Corporation Limited to issue Shanghai's first transition finance loan for the water transport industry. Structured in line with the Catalogue, this RMB 750 million loan was extended to a subsidiary of COSCO SHIPPING Development Co., Ltd. to support its low-carbon transition. Not only was it Shanghai's first, but it was also the first of its kind nationwide. As a pioneering initiative, it reinforced Shanghai's position as a global shipping hub and contributed to

China's broader ambition of becoming a world-leading maritime powerhouse.

Building on this milestone, BoCom will expand and accelerate the development of transition finance solutions for various other industries. We aim to establish a diverse suite of transition finance products, helping carbon-intensive industries transition more efficiently, and actively supporting Shanghai's journey toward a greener, low-carbon economy.



Case: BoCom facilitates the first climate investment and financing deal in Pudong New Area

In September 2024, BoCom participated in the "Shanghai Pudong New Area Climate Investment and Financing Project Pool Promotion Meeting and Low-Carbon Transition Application Forum", where it officially launched the first deal in the climate investment and financing project pool.

Since April 2022, when Pudong New Area was designated as one of China's first pilot regions for climate investment and financing, BoCom has worked closely with the Pudong Ecological Environment Bureau to identify and support key players across the Yangtze River Delta region. As part of these efforts, the Bank facilitated the Pufeng New Energy project in Yancheng, Jiangsu Province—the first project approved for the investment and financing pool, marking a successful integration of industry and finance. The launch of this first deal further strengthened BoCom's collaboration with Pufeng New Energy, showcasing the joint commitment of financial institutions and enterprises to advancing China's "dual carbon" strategy. It also underscored BoCom's continued expansion in green finance.

- **Ecological and Biodiversity Conservation**

Institutional safeguards for ecological and biodiversity protection

Policy	Specific Requirements
<i>BoCom Green Credit Implementation Measures</i>	Integrate ESG risk management into the comprehensive risk management framework to identify, monitor, prevent, and mitigate ESG risks across all business operations; pay close attention to potential environmental and social risks arising from the construction, production, and operational activities of clients and their key affiliates due to insufficient corporate governance and management. These risks may relate to ecological protection, environmental pollution, climate change, biodiversity, natural resource utilization, workplace safety, occupational health, gender equality, employee rights, land expropriation, housing demolition, resident relocation, and other ESG concerns.
<i>BoCom Credit and Risk Policy Outline</i>	Define biodiversity and ecological risk management requirements in credit policies for 13 industries with a significant impact on biodiversity; deny credit access to clients and projects that pose substantial environmental risks, including those that threaten protected wildlife and plant species, damage nature reserves, or disrupt key national ecological zones and national parks.
<i>Action Plan of BoCom for Carbon Peaking and Carbon Neutrality Goals</i>	Support major ecological conservation and restoration projects in forests, grasslands, wetlands, and oceans, ensuring compliance with market principles and legal frameworks.
<i>Action Plan of BoCom for Green Finance (2024-2025)</i>	Support ecological protection and restoration efforts in key national ecosystem zones, red lines for ecological conservation, and nature reserves; strengthen and enhance carbon sink capacity; facilitate the development of national parks, large-scale afforestation projects, and the Three-North Shelterbelt Forest Program to promote ecological diversity, stability, and sustainability.

4.1.2.2 Green Bonds

In 2024, BoCom issued its first green finance bond aligned with the Common Ground Taxonomy (CGT), a joint initiative of China and the European Union (EU). With a total issuance of RMB 5 billion, this bond represented a major step forward in our adoption of international green finance standards, further enriching and expanding our green finance portfolio.

Key Performance Highlights

Led the underwriting of 20 green and transition bonds, a year-on-year increase of 53.85%.

Served 17 bond issuers, a year-on-year increase of 41.67%.

Underwrote green and transition bonds, totaling RMB 6.979 billion.

As of the end of the reporting period, BOCOM International underwrote 32 green bonds and facilitated USD 9.5 billion in corporate financing—an increase of 13 bonds and USD 3.6 billion year-on-year.

Case: BOCOM International facilitates the issuance of sustainability bonds by Nanning Communications Investment Group

On April 24, 2024, BOCOM International assisted Nanning Communications Investment Group in successfully issuing a 3-year, USD 300 million senior sustainability bond. This transaction marked the first-ever sustainability bond issued by a Nanning-based state-owned enterprise and was structured under the issuer's Sustainable Financing Framework. The proceeds from this issuance will be allocated across three green financing categories and two social responsibility categories. The bond garnered strong demand from renowned international investors and helped reinforce Guangxi's international presence and strengthen its global connectivity.

Case: BoCom (Brazil) underwrites BRL 1.6 billion in green bonds to support renewable energy projects

BoCom (Brazil) is committed to green development and continues to expand its green finance portfolio. In 2024, BoCom (Brazil) underwrote BRL 1.6 billion in green bonds issued by Copel Geração e Transmissão S.A., with maturities of 5, 7, and 10 years. The proceeds will be used to finance renewable energy projects, directly supporting the expansion of Brazil's clean energy sector.



BoCom was awarded the "Largest Financial Corporate Green Bond of 2023" at the 9th Climate Bonds Awards, hosted by the Climate Bonds Initiative (CBI). This recognition highlights the confidence of the international market in BoCom's leadership in green finance and its commitment to advancing sustainable development. The award further solidifies BoCom's position as a key player in the global green finance sector.

4.1.2.3 Green Financial Services for Retail Customers

Since 2017, BoCom has actively developed its auto installment business, deepening its presence in auto finance to provide comprehensive, full-cycle green financial solutions. By offering seamless financing across various s, we aim to meet the consumer demand for green finance while supporting the sustainable growth of the new energy vehicle (NEV) industry. In 2024, in response to national policies and evolving market dynamics, we intensified efforts in NEV installment financing, focusing on product innovation, localized market adaptation, and refined channel operations to further advance green finance. At the end of the reporting period, the Bank had provided NEV installment financing to 242,900 customers, with total loan disbursements of RMB 30.4 billion. In 2024 alone, we served 188,100 customers, issuing RMB 21.9 billion in loans—an increase of 308% year-on-year.

Case: BoCom (Hong Kong) expands green finance services to promote low-carbon living

BoCom (Hong Kong) actively promotes and supports customers in adopting green, healthy, and sustainable lifestyles. It offers a diverse range of retail green finance products, including green time deposits, green mortgages, NEV loans, and HKSAR Government Green Bonds (through agency sales), in a bid to drive the green transformation and diversification of its retail product line. Key green finance initiatives include:

- ✓ Special Green Mortgage Interest Rate Plan – Introduced for properties certified with

Platinum or Gold ratings by the Hong Kong Green Building Council's (HKGBC) BEAM Plus program. As of the end of the reporting period, 93 property projects qualified for the program, and over 100 mortgage applications were approved;

- ✓ DreamCash NEV Loans – Launched to encourage zero-emission mobility solutions;
- ✓ HKSAR Government Retail Infrastructure Bonds – In response to the Hong Kong SAR Government's initiative to build a green and livable city and fund infrastructure projects, BoCom (Hong Kong) participated in the issuance of these bonds and assisted customers in subscribing to HKD 270 million worth;

- ✓ ESG fund sales – BoCom (Hong Kong) facilitated the sale of 39 ESG funds, providing customers with diverse green investment opportunities.

Through these initiatives, BoCom (Hong Kong) has not only expanded its green finance product portfolio to meet customers' needs for low-carbon living but has also played a key role in promoting sustainable lifestyle choices.

4.1.2.4 Green Trust

In 2024, BOCOM International Trust remained committed to China's "dual carbon" goals, embedding sustainability at the core of its business operations. The company actively expanded into green equity investment, green standard product investment, and green asset securitization, striving to advance comprehensive and high-quality growth in green finance. As of the end of the reporting period, the company's total green bond balance across the primary and secondary markets reached RMB 1.988 billion.

Case: BOCOM International Trust launches the first Pre-REIT equity investment in new energy

BOCOM International Trust successfully launched its first equity Pre-REIT focused on the new energy sector. In partnership with SAIC Financial Holdings and other institutions, the company established a private equity fund using its own capital to invest in Chint Aneng's distributed PV power plant assets. The initial phase, covering 148 MW across 5,478 power plants, distributed profits in its first year. This project expanded BOCOM International Trust's equity product portfolio and exemplified the Group's commitment to supporting China's new energy infrastructure, rural revitalization, green finance, and inclusive finance through diversified financial solutions.

4.1.2.5 Green Leasing

BOCOM Leasing remains committed to sustainable development, having established a robust policy framework that includes the *Green Finance Policy* and the *Action Plan for Promoting Green Finance Development and Serving the Dual Carbon Goals*. The company continues to strengthen the "BoCom Green Finance" brand through its green leasing offerings. In 2024, the company invested nearly RMB 20 billion in new green ship assets, while its aviation leasing business exclusively focused on next-generation fuel-efficient aircraft. By the end of the year, low-emission aircraft accounted for over 47% of its total fleet. To further streamline operations, BOCOM Leasing restructured its New Infrastructure (New Energy) Leasing Business Center, transforming it into a dedicated department. The company also expanded its green leasing product portfolio, upgrading the "Youneng Lease" 1+N series, with new leases totaling RMB 634 million in 2024. In a significant industry milestone, BOCOM Leasing launched the first financial leasing project to support the low-carbon transition of the steel sector. The Company also introduced its first financial leasing project in the textile sector to promote circular economy practices. Additionally, in 2024, BOCOM Leasing issued RMB 1.5 billion in green finance bonds aligned with the Common Ground Taxonomy and USD 950 million in green bonds outside the Chinese mainland under Regulation S, further expanding its global footprint in green finance.

Honors:

BOCOM Leasing's

"Youneng Lease", a distributed PV green leasing product, was selected for inclusion in the "2024 Cases of Innovative Practices in Building China into a Financial Powerhouse: Green Finance", published by People's Daily Online.

Honored with the "2024 Award of ESG Green Finance Practice Cases in the Banking Industry", presented by China Financial Media Company Limited.

Case study "Youneng Lease: Driving Carbon Reduction and Efficiency Gains in Industry Through Green Finance" was recognized as a "Practice Case of Building a Beautiful China" at the 10th Green Development Forum by Xinhuanet.

Case study "Actively Supporting the Heavy-Duty Truck Battery-Swapping Industry to Achieve 'Dual Carbon' Goals" was selected as one of the "Exemplary Green Finance Cases in Shanghai's Banking Industry" by the Shanghai Banking Association.

Case study "Youneng Lease: '1+N' Industrial and Commercial Distributed PV Products", was

named one of the "First Annual Innovative Cases of Green Leasing in China" by the Shanghai Financial Leasing Association.

Case study "Building the 'BoCom Green Finance' Model to Empower the Green Supply Chain" was featured as a "Green Responsible Investment Practice Case" in the *Research Report on ESG Development of Chinese Enterprises*, published by China Economic Information Service (CEIS).



In 2024, Liaohoukou, the first 7,500 CEU LNG dual-fuel pure car and truck carrier (PCTC) commissioned by BOCOM Leasing, set sail on its maiden voyage. As part of China's state-backed innovation in car and truck carriers, this project supported the global expansion of "Made in China" products.

4.1.2.6 Green Insurance

BOCOM MSIG Life continues to enhance its green finance framework, directing more investments toward green and ESG-focused projects through the formulation of green finance policies, credit policies, and performance assessment guidelines. As of the end of 2024, the company had invested RMB 7.935 billion in green finance products.

Case: BOCOM MSIG Life supports a green retirement community through an RMB 1.2 billion green debt plan

In 2024, the "BoCom-SIIC Green Retirement Infrastructure Debt Investment Plan" was launched, with a total issuance of RMB 1.2 billion and a 15-year maturity. This initiative is specifically designed to finance the development of a Continuing Care Retirement Community (CCRC) in Dongtan Wetland, Chongming District, Shanghai. Leveraging the ecological advantages of Dongtan Wetland, the project combines senior living and healthcare services with

eco-friendly tourism, rural cultural experiences, and modern urban agriculture, creating a sustainable, all-age-inclusive retirement community. The project has been awarded China's highest "G1" green rating.

4.1.2.7 Green Investment

The Bank is committed to integrating ESG considerations into its investment process. This reflects its dedication to responsible investing and the advancement of green finance. As part of these efforts, BOCOM International has established the *Risk Management Measures for Direct Investment Business*, incorporating a dedicated ESG identification process into its project review framework. Under these measures, business teams are explicitly required to assess ESG performance from multiple dimensions when evaluating potential investments.

Case: BOCOM Wealth invested the Jiaxing Phase 1 Green Asset-Backed Special Plan for Natural Gas Toll Revenue Rights

In 2024, BOCOM Wealth invested RMB 164 million in the Jiaxing Phase 1 Green Asset-Backed Special Plan for Natural Gas Toll Revenue Rights. The underlying clean energy project meets the standards set by the *Guidance Catalogue for Green and Low-Carbon Transition Industries (2024 Edition)*. The underlying assets financed by the raised funds are expected to achieve the following environmental impact: annual energy savings of approximately 1,326,100 tonnes of standard coal; CO₂ emission reduction of around 3,229,500 tonnes; SO₂ emission reduction of approximately 27,053.67 tonnes; and NO_x emission reduction of about 6,190.24 tonnes. As a result, the project received a green rating of "G1".

4.1.2.8 Green Funds

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

ESG Fund	Feature
BOCOM Schroders SSE 180 Corporate Governance ETF Feeder Fund	This fund includes stocks from the SSE Corporate Governance sector, which evaluates listed companies' governance performance based on seven key dimensions, including shareholder governance and board governance. The sector's high-quality stock selection enhances the fund's

	ESG profile by including companies with strong corporate governance and stability. As of the end of the reporting period, the fund had RMB 331 million in assets under management (AUM), achieving a net asset value (NAV) growth of 18.13% over the past year.
BOCOM Schroders CNI New Energy Index Fund (LOF)	This fund passively tracks the CNI New Energy Index, with its constituent stocks primarily focused on the new energy and NEV industries. It offers strong medium- to long-term investment value. As of the end of the reporting period, the fund had RMB 353 million in AUM, with class-A shares recording an NAV growth of 8.53% over the past year.
BOCOM Schroders CSI Environmental Governance Index Securities Investment Fund (LOF)	This fund passively tracks the CSI Environmental Governance Index, with its constituent stocks concentrated in environmental protection-related public utilities. As a pure-play environmental protection index fund, it specifically targets the environmental sector within ESG investing. As of the end of the reporting period, the fund had RMB 331 million in AUM, with class-A shares recording an NAV growth of 6.33% over the past year.

4.1.2.9 Green Wealth Management

BOCOM Wealth continues to make steady progress in advancing green finance, driving innovation in green financial products and services. The company has expanded the issuance of ESG-themed strategic wealth management products, strengthened ESG risk management, and mobilized more private capital towards green and low-carbon sectors. It aims to provide financial support for green industries and facilitate the sustainable transition of businesses. In 2024, BOCOM Wealth launched 10 new ESG-themed products, with a total issuance of RMB 7.632 billion. As of the end of the reporting period, 12 ESG-themed products remained outstanding, with a total value of RMB 9.932 billion.

4.2 Practicing Low-Carbon Operations to Lead the Green Transformation

The Bank remains committed to green operations, strictly adhering to the *Environmental Protection Law of the People's Republic of China* and the *Energy Conservation Law of the People's Republic of China*, among other relevant regulations. We strive to conserve energy resources and enhance their efficiency. To minimize the environmental impact of our operations,

we continuously optimize business processes, adopt eco-friendly materials, and implement energy-efficient technologies, ensuring that all activities meet the highest environmental standards. During the reporting period, BoCom did not receive any administrative penalties related to environmental issues.

4.2.1 Green Services

BoCom continues to expand and enhance its green service offerings. In 2024, we focused on key sectors such as clean energy, low-carbon transportation, energy efficiency, and environmental protection, introducing a range of innovative green finance products. These include specialized green credit facilities, carbon neutrality-themed wealth management products, and green supply chain finance solutions, among others. In addition, we enhanced the "WINTO" corporate banking brand and launched version 9.0 of our mobile banking app, providing greener, more inclusive, efficient, and user-friendly financial services to both corporate clients and retail customers.



BoCom released the "WINTO" corporate banking brand

Table: Environmental benefits of green services

Customer Category	Customer/Transaction Scale	Annual Growth	Environmental Benefits (Equivalent)		
			Trees Planted	CO ₂ Emissions Reduced	Paper Saved
Corporate online banking (including mobile banking)	RMB 225.57 trillion	17.18%	601,100	8,441.35 tonnes	34,101.13 tonnes
Personal online banking (including mobile banking)	10.276 billion transactions	-0.01%	1,881,600	26,402.4 tonnes	106,263.83 tonnes

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

4.2.2 Green Office Practices

The Bank upholds the principle of green development, making sustainability a core pillar of the Group's operations. We actively promote an ecology-first, resource-efficient, and low-carbon development approach while strengthening our green governance capabilities. As part of our ongoing efforts to integrate "dual-carbon" goals into our operations, we continuously assess energy-saving and carbon-reduction potential to provide data-driven insights for the next phase of our low-carbon transition. In advocating for green office practices, we have strengthened energy management and implemented various initiatives, such as green and energy-efficient building upgrades, the "Clean Your Plate" campaign in canteens, waste sorting programs, and water balance tests. These initiatives aim to enhance resource efficiency and reduce the environmental footprint of our operations.

In 2024, the Head Office intensified its hazardous waste management efforts to prevent environmental pollution and safeguard public health. Following the installation of remote water meters and the implementation of smart monitoring platforms at Jinming Building, BoCom Financial Towers, and Zhangjiang Park, as well as the completion of water balance tests, we took proactive measures to develop "water-saving institutions". These initiatives support the Head Office's transition to a low-carbon operational model, reinforcing our commitment to balancing economic growth with environmental responsibility.



BoCom was recognized as "A Pilot Unit for Carbon Accounting and Information Disclosure".

Developing Green Data Centers

The Bank actively promotes green and low-carbon operations in its data centers while upgrading existing server facilities to improve energy efficiency. A dedicated energy management

team continuously identifies energy-saving opportunities, implements green technologies, and develops a comprehensive carbon emissions measurement system. These efforts have led to significant efficiency gains across our data centers. As a pilot project, our Pujiang Park is being developed into a model green and low-carbon data park, with a focus on precise energy management for server operations. This includes optimizing HVAC (heating, ventilation, and air conditioning), power distribution, and auxiliary systems, recovering waste heat, and integrating energy-saving measures into routine maintenance to elevate data center environmental standards.

Table: Reducing the environmental impact of daily operations

The Bank strictly adheres to laws and regulations such as the *Air Pollution Prevention and Control Law of the People's Republic of China*, *Water Pollution Prevention and Control Law of the People's Republic of China*, *Soil Pollution Prevention and Control Law of the People's Republic of China* and *Solid Waste Pollution Prevention and Control Law of the People's Republic of China*, strengthens pollution prevention and control efforts, comprehensively promotes energy conservation and emission reduction work, and strictly regulates the disposal processes of various types of waste to safeguard the ecological environment.

Prevent and control pollution	<p>The Bank has implemented enhanced management measures to ensure strict compliance with pollutant discharge permits. This includes regulated operations and maintenance of pollution control facilities, third-party monitoring, detailed record-keeping, timely submission of compliance reports, and proactive environmental information disclosure. These measures ensure that boiler emissions from office buildings remain within both national and local emission standards and total discharge limits.</p> <p>During the maintenance and servicing of central air conditioning systems, the Bank follows strict operational protocols, including the recovery and reuse of reclaimed refrigerants to minimize leaks of ozone-depleting substances.</p>
Energy conservation and emission reduction	<p>To improve energy efficiency and reduce emissions, we have established an Energy Management Team to oversee our sustainability efforts. Energy-saving practices are embedded across our operations, workforce, and management processes, ensuring a company-wide commitment to conservation. Through the "Smart Corporate Service" system, we continuously track energy usage in real time. The system automatically records electricity and gas consumption and generates trend charts to deliver data-driven insights to optimize energy management and forecast patterns. We have also introduced water conservation measures, including installing remote water meters, developing smart</p>

	<p>monitoring systems, and conducting water balance tests at BoCom Financial Towers and Zhangjiang Park. As a result, Jinming Building has been officially recognized as a "water-saving institution". Additionally, we have undertaken green retrofitting projects across our Head Office buildings, transforming them into eco-friendly, low-carbon workplaces.</p>	
Water resource management	<p>We use the "Smart Corporate Service" platform to monitor water consumption in real time, enabling prompt detection and resolution of system malfunctions to prevent leaks, overflows, and unnecessary wastage. Additionally, we promote water-saving technologies, such as reclaimed water recycling and high-temperature wastewater recovery from boilers, to further improve efficiency. (Note: The Bank exclusively uses the municipal water supply and does not extract water from natural sources. There are no concerns regarding compliant and reliable access to water.)</p>	
Waste management	Electronic waste	<p>We have signed contracts with certified companies to properly recycle and repurpose waste electronic circuit boards generated from Head Office buildings and parks.</p>
	Non-hazardous waste	<p>We actively promote paperless operations, prioritize double-sided printing, and implement the "Clean Your Plate" program to minimize non-hazardous waste at its source. In addition, we implement a robust waste classification and disposal system, working in collaboration with sanitation companies through formal agreements to ensure the regular collection, transportation, and proper disposal of generated non-hazardous waste.</p> <p>We have expanded the implementation of the "Smart Corporate Service" information system and increased the coverage of meal-ordering service points to further reduce waste at the source. At BoCom Financial Towers and Jinming Building, meal-ordering systems have been optimized, incorporating measures such as half-portion options and staggered, small-batch meal preparation to minimize food waste.</p>
	Hazardous waste	<p>Hazardous waste collection, transportation, storage, and disposal are conducted in strict compliance with a technology roadmap that aligns with relevant national regulations.</p> <p>We have standardized the hazardous waste management process by implementing stricter management standards,</p>

		<p>clearly defining responsibilities across departments, and fully adhering to the new regulations effective July 1, 2023. These regulations require the proper labeling of hazardous waste identification tags and the installation of signage for hazardous waste storage facilities to ensure standardized handling.</p> <p>We have implemented a structured process for the disposal of fluorescent tubes. Before January 2024, we completed the submission of our hazardous waste management plan to the Shanghai Hazardous Waste Management Information System as required by regulatory authorities. By pre-arranging hazardous waste transfer manifests, we ensured the timely collection and disposal of discarded fluorescent tubes from our Shanghai locations. The process was carried out by certified disposal companies, with designated vehicles, personnel, and fixed collection schedules. From January 1 to December 31, 2024, a total of 397.5 kg of discarded light tubes and 2.5 kg of discarded circuit boards were properly disposed of.</p>
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Table: Environmental management targets for Head Office buildings and parks

Reduction in electricity consumption in 2025 compared to 2023: 3%
Reduction in natural gas consumption in 2025 compared to 2023: 3%
Reduction in non-hazardous waste in 2025 compared to 2023: 5%

Note: The 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: 2024 data on group-wide green office practices

Indicator	Total Volume	Per Capita Volume (Calculated for 127,595 Persons)
Group-wide consumption	Water use: 3,678,793 tonnes Water discharge: 3,310,914 tonnes Water consumption: 367,879 tonnes	Water consumption: 29 tonnes per person
	Power consumption: 760,385	Power consumption: 5,959 kWh

	MWh Natural gas consumption: 586 10 ⁴ Nm ³ Gasoline consumption: 3,025,557 L Diesel consumption: 186,090 L	per person Natural gas consumption: 46 m ³ per person Gasoline consumption: 24 L per person Diesel consumption: 1.46 L per person
Group-wide GHG emissions	Scope 1 GHG emissions: 19,935 tCO ₂ e Scope 2 GHG emission: 467,468 tCO ₂ e Total emissions: 487,403 tCO ₂ e	Total emissions: 3.82 tCO ₂ e per person
Group-wide total energy consumption (equivalent to standard coal)	101,247 tonnes	0.79 tonnes per person
Group-wide paper consumption	1,785 tonnes	0.01 tonnes per person
Group-wide video conferences	176,524 sessions	

Note: The GHG emissions from the Group's own operations are mainly generated by energy use, including Scope 1 and Scope 2 emissions. Among them, Scope 1 refers to direct emissions from the combustion of fossil fuels such as gasoline, diesel, natural gas, liquefied natural gas, liquefied petroleum gas, and fuel oil; Scope 2 refers to indirect emissions embodied in the consumption of electricity and heat.

Table: 2024 group-wide non-hazardous waste discharge

Type	Total Volume (tonnes)	Per Capita Volume (tonnes/person) (Calculated for 127595 Persons)
Household waste	6,349	0.05
Kitchen waste (including wet waste)	2,509	0.02
Total	8,858	0.07

Note: The Group had 127595 energy-consuming employees in 2024 (including dispatched employees).

Table: 2024 vehicle usage at the Head Office

Vehicle Type	Distance Traveled (km)	
Light vehicles (≤ 2.5 tonnes)	446,893	
Light vehicles (2.5-3.5 tonnes)	132,636	
Light vehicles (3.5-5.5 tonnes)	90,696	
Medium and heavy vehicles (5.5-15 tonnes)	31,940	
Fuel Type	Consumption (L)	Per Capita Consumption (L/person) (Calculated for 4,791 Persons)
Diesel	8,489.86	1.77
Gasoline	76,537.59	15.98

Table: 2024 emissions at the Head Office

Type	Emission (tonnes)
Nox	1.28
SOx	0.14
Particulate Matter (PM)	0.047

Note: Emission calculation factors are sourced from HKEX's *Reporting guidance on Environmental KPIs*.

Table: 2024 electronic waste discharge from the Head Office

Types	Total Volume (units)	Per Capita Volume (units/person) (Calculated for 4,791 Persons)
Mainframe	1,238	0.2584
Display	1,238	0.2584
Laptop	1,289	0.269
Printer	38	0.0079
Duplicator	6	0.0013

Table: 2024 hazardous waste treated from the Head Office

Type	Total Volume (tonnes)	Per Capita Volume (kg/person) (Calculated for 4,791 Persons)
Discarded light tubes	0.3975	0.083

Discarded circuit boards	0.0025	0.0005
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Table: 2024 packaging materials used for finished products

Type	Unit	Value	Change from 2023
Total weight of credit card envelopes	tonnes	99.04	Up 31.67%
Weight per credit card envelope(various specifications)	g	6, 10	No change
Total weight of credit card covers	tonnes	330.61	Up 13.96%
Weight per credit card cover	g	40	No change
Total weight of credit card letters	tonnes	47.32	Down 26.6%
Weight per credit card letter	g	6	No change
Total weight of materials for credit cards	tonnes	476.97	Up 10.97%
Density of packaging materials used for finished products	tonnes/10,000 sheets	0.58	Up 45%

5 Society: Working Together for a Sustainable Future

Embracing Sustainable Development Trends

Committed to the mission of "creating shared value", the Bank actively fulfills social responsibilities by supporting employee growth, enhancing customer experience, strengthening supply chain resilience, and giving back to the community. In doing so, we are contributing to the fostering of a more harmonious society.

Aligning with SDGs



Our actions

Fostering employee growth; Enhancing customer experience; Strengthening supply chain security; Contributing to society

Our performance

Average training hours of employees: 111

Financial awareness sessions conducted: 48,000

Donation to charitable causes: RMB 58.8399 million

Number of public welfare projects: 225

Employee volunteer hours: 327,556

5.1 Working Together to Foster Employee Growth

The Bank upholds the employee development philosophy of "co-creation, shared prosperity, mutual success, shared responsibility, and win-win outcome". We are committed to fostering a healthy and harmonious working environment, providing a robust platform for career development, and safeguarding employees' fundamental rights and interests. Through this commitment, we strive to achieve a balanced synergy between corporate sustainability and employee growth.

5.1.1 Protecting Employee Rights and Interests

We strictly abide by relevant 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*, and the State Council's *Provisions on the Prohibition of Using Child Labor*. In alignment with these regulations

and our operational conditions, we have formulated and implemented internal policies such as the *Measures of BoCom for Employment Contracts*, the *Measures of BoCom for Employee Recruitment and Hiring Management*, the *BoCom Employee Leave Regulations*, the *Prudent Remuneration Management Measures*, and the *Management Measures for Supplementary Medical Insurance of Banking Institutions on the Chinese Mainland*. We have also revised the *Special Collective Agreement of Bank of Communications Co., Ltd. on the Protection of Female Employees' Rights and Interests* and the *Management Measures of BoCom for Employee Dismissal and Resignation*. With these measures, the Bank has put in place a complete set of policies on employee management, care, and support to effectively safeguard their fundamental rights and interests.

The Bank is committed to the principles of equal employment and equal pay for equal work. We maintain a transparent, fair, competitive, and merit-based recruitment process to promote fair employment opportunities while strictly prohibiting discrimination based on factors such as gender, ethnicity, region, or religion. During recruitment, we enforce rigorous qualification standards and strictly prohibit illegal practices such as child labor and forced labor. Any violations will be addressed in accordance with the *Measures of BoCom for Handling Employee Misconduct*.

The Bank has established a corporate democratic management system centered on the workers' congress. We have refined relevant management measures and strengthened the three-tier organizational structure (head office–branches–sub-branches) to enhance operational standardization. We convene workers' congresses based on standard procedures and work to ensure public disclosure of corporate affairs, transparent decision-making, and democratic review of policies that affect employees' immediate interests. These efforts effectively safeguard employees' rights to information, participation, and oversight.

Key Performance Highlights:

As of the end of the reporting period, we signed employment contracts with all regular employees on the Chinese mainland, offering compliant and stable compensation packages along with a comprehensive social security system. In full compliance with the *Social Insurance Law* and other relevant regulations in China, we have ensured that all employees are enrolled in basic pension insurance, basic medical insurance, work-related injury insurance, maternity insurance, and unemployment insurance.

Key Performance Highlights:

As of the end of the reporting period,

Group employees (including subsidiaries): 95,746

Employees of banking institutions on the Chinese mainland: 89,301

Employees of subsidiaries (excluding those assigned to subsidiaries from the Head Office and branches): 3,822

Local employees of branches and sub-branches outside the Chinese mainland: 2,623

Distribution by gender (banking institutions on the Chinese mainland)

Male employees: 40,004

Female employees: 49,297

Distribution by age (banking institutions on the Chinese mainland)

30 and under: 24,421

31-50: 52,785

51 and over: 12,095

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

Regular employees: 85,147

Dispatched employees: 4,154

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

Employees in the Yangtze River Delta: 24,007

Employees in Central China: 15,012

Employees in the Bohai Rim: 14,385

Employees in Western China: 12,243

Employees in the Pearl River Delta: 10,261

Employees in Northeast China: 8,461

Head Office employees: 4,932

Employees outside the Chinese mainland: 2,623

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

Employees with less than a bachelor's degree: 7,908

Employees with a bachelor's degree: 63,468

Employees with a master's degree or higher: 17,925

Employee turnover rate (banking institutions on the Chinese mainland)

Male employee turnover rate: 1.70%

Female employee turnover rate: 1.64%

Turnover rate of employees aged 30 and below: 3.92%

Turnover rate of employees aged 31-50: 0.88%

Turnover rate of employees aged 51 and above: 0.06%

Turnover rate of employees in the Yangtze River Delta: 1.88%

Turnover rate of employees in Central China: 1.91%

Turnover rate of employees in the Bohai Rim: 1.15%

Turnover rate of employees in Western China: 2.12%

Turnover rate of employees in the Pearl River Delta: 1.87%

Turnover rate of employees in Northeast China: 0.90%

Turnover ratio of employees at the Head Office: 1.41%

Honors and Awards:

The Bank was awarded the "Employer Excellence of China 2024" by 51job.com and the "China Best Employer Award 2024" by zhaopin.com.

5.1.2 Supporting Employee Growth

The Bank has established a robust talent cultivation mechanism and a comprehensive training system, offering ample career development opportunities. This fosters engagement and creativity at work, ensuring that employees and the Bank grow together.

5.1.2.1 Focusing on Talent Cultivation

The Bank follows internal policies such as the *BoCom Opinions on Further Strengthening Talent Cultivation Across the Bank*, the *BoCom Fintech Talent Development Plan (2020-2024)*, and the *Action Plan of BoCom for Enhancing the Key Talent Competence*. By implementing the "National Hundred, Thousand, and Ten Thousand Talents" key talent development initiative, we take a strategic approach to talent development, committed to cultivating high-caliber financial professionals and strengthening our core competitiveness.

Talent cultivation initiatives

Talent cultivation mechanisms	<ul style="list-style-type: none"> ● We take a coordinated, integrated, and collaborative approach to developing the "six professional talent teams" and talent teams for the "Five Priorities" of technology finance, green finance, inclusive finance, pension finance and digital finance. ● We have defined principles for structured and categorized talent cultivation, created key talent cultivation models, provided refined talent cultivation tools, enhanced talent profiling, and specified implementation and follow-up methods, so as to ensure that talent cultivation is implemented effectively. ● We have also established a dynamic management mechanism for key talent lists, combining "centralized adjustment" with "dynamic adjustment" to ensure key talent quality.
Student internship programs	<ul style="list-style-type: none"> ● We have carefully organized summer internship programs for university students from Taiwan, offering a high-quality learning platform and workplace experience.
Talent training system	<ul style="list-style-type: none"> ● We have developed a "1+2+6+9" training system, leveraging the synergy of 1 center, 2 bases, 6 regional centers, and 9 major business units. ● We have established an onboarding training program featuring "1+7" core courses, 24 general fundamental courses, and 20 professional skills courses to ensure new employees receive structured and comprehensive training. ● In 2024, we conducted 13,254 training sessions, with a registered attendance of 1.05 million persons.

Key Performance Highlights:

As of the end of the reporting period,

Total number of trainees (including online training): 1.05 million

Proportion of male employees trained: 91.59%

Proportion of female employees trained: 92.75%

Proportion of managers trained: 8.58%

Proportion of special talents trained: 11.08%

Proportion of business personnel trained: 62.01%

Proportion of other employees trained: 18.34%

Average employee training hours: 111

Average training hours of male employees: 116

Average training hours of female employees: 107

Average training hours of Level A employees: 107

Average training hours of Level B employees: 111

Average training hours of Level C employees: 136

Average training hours of Level D employees: 148

Average training hours of Level E employees: 124

Note: Staff grade is divided into 5 Levels (A, B, C, D, E).



We reached out to the Security Bureau of the HKSAR Government and organized the "Security Bureau Youth Uniformed Group Leaders Forum: BoCom Financial Seminar". As part of this initiative, we arranged for 6 forum members to participate in our summer internship program, enhancing their financial knowledge and preparing for the future recruitment of top talents to the Bank.

5.1.2.2 Enhancing Development Pathways

The Bank focuses on establishing robust, seamless, and transparent career development pathways that support career advancement and encourage employees to actively pursue and fulfill their personal potential.

Employee development pathways

- We have established professional career pathways that allow for both vertical promotion and horizontal mobility. This approach encourages specialists with deep expertise in their fields while expanding career development options for employees at all levels.
- With a focus on responsibility, grassroots involvement, and performance, we regularly conduct expert promotion initiatives to broaden career development paths for specialized talent.
- We conduct regular performance evaluations for all in-service employees. The results will be communicated to employees by assessment supervisors during year-end performance reviews.

- The remuneration of senior management personnel is linked to the results of performance evaluation, and the performance appraisal evaluation indexes are equipped with the proportion of green credit to assess the service of ecological civilization strategy. The remuneration of the heads of branches is linked to the results of the unit's business performance evaluation, and the performance evaluation indicators of provincial branches and subsidiaries are set with indicators of green finance (green credit), science and technology finance or strategic emerging, covering the investment of green credit in energy-saving and environmental protection, new energy sources, new materials and other green credits, to support the Bank's high-quality development of green financial business.
- To enhance the incentive and accountability mechanism and give full play to the guiding role of remuneration in operation and management, we have formulated the *Management Measures of BoCom for Deferred Payment and Clawback of Performance-based Salaries*. The *Measures* puts in place a system for the deferred payment and clawback of performance-based salaries to senior management and key positions, deferring more than 40% of their performance-based salaries for at least three years. In subsequent years, payment may be suspended and the paid salary may be clawed back in case of extraordinary risk exposure or legal, regulatory, or disciplinary violations.

5.1.3 Caring for Employees

Committed to a people-oriented corporate culture, the Bank actively responds to employees' needs and expectations and supports employee well-being in every detailed way. In doing so, we foster a harmonious labor relationship and ensure that warmth and support reach every employee.

5.1.3.1 Caring for Employee's Health

In strict compliance with 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 *Security Work Standards of BoCom for Business Outlets*, and the *Implementation Rules of BoCom for Fire Safety Management*, to enhance employee health protection measures and ensure employee health and well-being.

In accordance with relevant national regulations, the Bank has made timely and full social insurance contributions for employees, including basic medical insurance and work-related injury insurance. We also provide group supplementary medical insurance and organize regular employee health check-ups.

Work-related injuries of BoCom employees

Indicator	2024	2023	2022
Work-related fatalities	2	3	3
Work-related fatality rate (%)	0.0022	0.0034	0.0037
Days lost to work-related injuries	11,401	9,317.5	6,880.5

Note: Work-related fatality rate = Number of work-related fatalities/Total number of employees at institutions on the Chinese mainland in 2024



On September 11, 2024, the Fujian Branch held a themed event, "Healthy Life with the Help of Health Workers", with health education, professional health assessments, and consultation services, providing employees with valuable support.

5.1.3.2 Assisting and Supporting Employees

The Bank is dedicated to supporting employees by providing daily care and assistance, effectively enhancing their sense of well-being, security, and fulfillment.

Initiatives to provide assistance to employees

- By upgrading our mutual aid system, we have established a comprehensive framework that includes basic medical care insurance, supplementary medical insurance, employee care and support, and mutual aid subsidies. In 2024, 75,237 employees voluntarily participated in mutual aid initiatives, providing subsidies approximately of RMB 8 million to nearly 500 employees.
- In celebration of International Women's Day, we organized a Women's Care Week campaign, featuring seminars on women's health, career development, and personal image enhancement and special activities such as book clubs, garden parties, interviews with female role models, and cheongsam shows. The campaign reinforced our commitment to supporting and empowering female employees.

5.1.3.3 Enhancing Cultural and Spiritual Well-Being

We advocate a "positive, healthy, free, and happy" lifestyle and creatively organize diverse cultural and sports activities to help employees achieve a better work-life balance while strengthening team cohesion.



The Hebei Branch organized the 2024 "Unity and Progress Cup" employee 3-on-3 basketball tournament.



The Chongqing Branch organized badminton tournaments. It established 8 internal clubs, including badminton, football, yoga, calligraphy, and painting.



The Labor Union of Wuzhong Sub-branch of Suzhou Branch held the family day event "Walking with Your Loved Ones in Early Summer", allowing employees and their families to enjoy a relaxing weekend while strengthening team cohesion.



The Heilongjiang Branch launched the "Meeting in Autumn" youth gathering event. This initiative provided an opportunity for young employees to connect with peers from various industries, broaden their horizons, and strengthen social networks.

5.2 Enhancing Customer Experience with Dedicated Efforts

The Bank actively fosters and promotes a financial culture with Chinese characteristics. Committed to a customer-oriented service philosophy, we have incorporated consumer rights protection into corporate governance and business strategy, strengthened consumer protection management throughout the entire service process, safeguarded data security and customer privacy, and ensured that financial consumers are treated with fairness, equity, and integrity across all operations.

5.2.1 Strengthening Consumer Protection

The Bank has established an overarching consumer protection framework, incorporating consumer protection into corporate governance, corporate culture, and daily operations. We have continuously enhanced consumer protection mechanisms while improving financial service capabilities and standards, effectively safeguarding the legitimate rights and interests of financial consumers.

5.2.1.1 Refining the Consumer Protection Mechanisms

The Bank's Board of Directors assumes the ultimate responsibility for consumer protection. It has established the Social Responsibility (Environmental, Social, and Governance) and Consumer Protection Committee and the Consumer Protection Working Committee to provide overall planning and guidance for consumer protection initiatives.

As of 2024, the Bank had established and enacted 15 working mechanisms to ensure a structured and regulated approach to consumer rights protection. These mechanisms cover consumer protection review, suitability management, sales conduct traceability, personal information protection, partner institution list management, diversified dispute resolution,

financial education, and financial marketing and communications. We fully follow the requirements of financial regulators and pay close attention to consumer concerns. In 2024, we revised and issued 17 consumer protection policies, including the *Management Measures of BoCom for Handling Customer Feedback (Complaints)*, the *Management Measures of BoCom for Personal Customer Information Protection*, the *Management Measures of BoCom for Financial Marketing and Publicity*, the *Management Measures of BoCom for Partner Institution Consumer Rights Protection*, and the *Management Measures of BoCom for Consumer Protection Information Disclosure*. Currently, we have 31 consumer protection policies in effect.

Status of consumer protection mechanisms

Comprehensive consumer protection review	<ul style="list-style-type: none"> ● For the products and services we provide, we conduct comprehensive reviews across all stages, from design and development, pricing management, and policy and agreement formulation, to marketing and promotion. Our review covers everything that may impact consumers, including policies, business rules, customer procedures, pricing and charges, agreement terms, promotional materials, and communication scripts across processes, channels, scenarios, and transaction chains. Clear and specific review opinions are provided. ● Based on complaints, lawsuits, public opinions, and satisfaction surveys, we have released the <i>Consumer Protection Review Highlights (Version 4.0)</i>. This updated version covers both corporate and private businesses and integrates consumer protection into all aspects of daily operations to prevent potential infringements.
Digital empowerment	<ul style="list-style-type: none"> ● We have extended the application of intelligent consumer protection review tools to systematically manage key processes, including submission, review, inspection, countersigning, and archiving, enhancing both the quality and efficiency of consumer protection reviews. ● Using AI-driven derivative technologies, we have developed a review database containing over 6,000 sensitive and banned words. Additionally, we integrate optical character recognition (OCR) technology, natural language processing (NLP) technology, and machine learning algorithms to support manual review processes. ● System controls have been integrated into such processes as document issuance, legal review, SMS delivery, demand submission, and marketing campaign launches to shift consumer protection reviews upstream and prevent any oversight in required reviews.
Consumer protection training for employees	<ul style="list-style-type: none"> ● We have carried out categorized and tiered consumer protection training covering senior and middle management, consumer protection staff, frontline business personnel, and new recruits, continuously enhancing their expertise in consumer protection. ● Based on job roles and operational needs, tailored training has been

	<p>provided for complaint-prone issues and high-risk business areas.</p> <ul style="list-style-type: none"> ● We have developed 28 courses covering key topics such as consumer protection review analysis, intelligent review tools, dispute mediation, and complaint management systems. Additionally, we have introduced 19 innovative microlectures to further enhance consumer protection staff's competence.
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Key Performance Highlights:

As of the end of the reporting period,

Consumer protection reviews conducted: 32,900.

Consumer protection training participants: 111,300.

5.2.1.2 Strengthening the Complaint Management System

The Bank has established a fast, efficient, and seamless complaint management system to strengthen complaints management through seven key mechanisms: complaint handling, analysis, supervision, accountability, traceability and rectification, diversified resolution, and emergency response. This holistic approach addresses both the symptoms and root causes of complaints, ensuring efficient resolution across all channels, businesses, and processes. We draw on the "Fengqiao Experience" for diversified dispute resolution and continuously enhance the complaint management system with advanced technologies.

Initiatives to strengthen complaints handling

Complaints handling mechanisms	<ul style="list-style-type: none"> ● We have streamlined the customer feedback handling workflow to ensure seamless online and offline channels for collecting and addressing various customer concerns timely. ● We have promoted a fast-track response mechanism for customer feedback, streamlining internal processes to shorten handling time and significantly enhancing issue resolution efficiency. ● With a problem-oriented approach, we conduct in-depth analyses of customer complaints to identify root causes. We proactively address technical flaws, product and process deficiencies, and service gaps through comprehensive traceability and corrective measures. ● The Bank has established a system-wide comprehensive consumer dispute mediation mechanism, fully leveraging mediation programs to resolve conflicts effectively. Currently, we collaborate with 220 mediation organizations and have 165 full-time and part-time mediators. In 2024, 7,004 disputes were successfully mediated, with mediation agreements enforced.
Seamless complaint	<ul style="list-style-type: none"> ● We have established accessible complaint submission channels, including bank outlets, the official website, email, mobile banking, online banking,

handling channels	the "Pay for It" app (for BoCom credit cards), and the BoCom WeChat official account. A dedicated complaint handling team, comprising service center specialists, business personnel from the Head Office and branches, and specialized complaint handlers at all levels, guarantees timely acceptance, seamless processing, and efficient and compliant resolution of complaints under closed-loop management.
Enhanced technology empowerment	<ul style="list-style-type: none"> ● We have developed an intelligent complaint classification model for automatic assignment of complaints to the appropriate departments and business units. This model boosts the processing speed from 200 cases per hour per person to 200 cases per second, enabling real-time classification. ● We leverage robotic process automation (RPA) to automate the retrieval, entry, and dispatch of case referrals from regulators. As a result, referrals across the Bank are auto-logged into the system within seconds and assigned for processing within 30 minutes. ● We utilize AI large models to automatically categorize complaints by product type, service channel, and complaint reason, reducing classification time from 3 minutes per case to 1 minute and improving classification accuracy to over 90%. ● We have integrated AI-powered large models with NLP-based small models to enhance complaint recognition, enabling rapid and accurate issue identification and enhancing the quality and efficiency of complaint management. With a database of over 1,000 complaint categories, the system achieves an accuracy rate of 96%.



BoCom customer complaint handling procedures and channels

Handling of customer complaints

Indicator	2024
Number of consumer complaints	315,000
Proportion of complaints settled within 15 days	100%
Time for handling complaints	7×24

Note: Consumer complaints are mainly related to services such as credit cards, debit cards, and personal loans, and are primarily concentrated in regions including Shanghai, Jiangsu, Guangdong, and Shandong. After eliminating the duplicated cases, the number of consumer complaints is 315,000.

5.2.1.3 Promoting Fair Marketing

The Bank strictly adheres to the *Advertising Law of the People's Republic of China*, the *Trademark Law of the People's Republic of China*, and other relevant laws and regulations. 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*, and the *BoCom Corporate Identity Management Handbook*. In accordance with these laws and policies, we have conducted regular employee training, strengthened the integrated management of the Group's brands and trademarks, standardized workflows, and established clear protocols for handling commercial disputes or risk events related to advertising, trademarks, and similar issues. As of the end of the reporting period, the Bank had no violations related to advertising, trademarks, product and service information and labeling, or marketing and communication activities.

In 2024, the Bank established online marketing channels for offline supermarkets. We launched promotional campaigns such as the "Vanguard 40th Anniversary Promotion", "Yonghui Superstores: RMB 38 Discount on Purchases over RMB 148", and "Lianhua Supermarket Discount Day", helping offline retailers better communicate event information to their target customers. By leveraging data analysis and customer feedback, we continuously refined platform features and user experience.

5.2.1.4 Managing Debt Collection

The Bank places great emphasis on debt collection management and has developed and implemented policies such as the *BoCom Pacific Credit Card Judicial Collection Management Measures for Branches*, the *Management Guidelines of BoCom for Outsourced Local Credit Card Debt Collection Service Providers for Branches*, and the *BoCom Quality Management Guidelines for the Collection and Anti-Fraud Department of Pacific Credit Card Center*. These measures

establish standardized collection procedures to ensure effective protection of consumers' legitimate rights and interests.

Initiatives for debt collection management

Collection mechanism	<ul style="list-style-type: none"> ● The Bank employs both manual and non-manual collection methods to remind customers of overdue payments. Manual collection includes phone calls, face-to-face communication, and judicial collections, while non-manual collection involves SMS, letters, emails, interactive voice response (IVR) notifications, and intelligent voice reminders. Additionally, outsourced collections are conducted based on specific circumstances. ● A combination of intelligent and manual methods is used to provide tailored repayment reminder services. SMS, emails, and IVR notifications are sent to remind customers of upcoming due dates. For customers overdue by up to 30 days, reminders are sent through a combination of "robot + manual" methods. For those overdue by 90 days, manual phone calls are made. For customers overdue by more than 90 days, manual phone calls or face-to-face communication are used to remind them.
Compliant collection operations	<ul style="list-style-type: none"> ● In protection of customer experience, we ensure that debt collection is not conducted with third parties unrelated to the debt and that no threats or intimidation, or impersonation of government or judicial authorities are used. ● Customer information is obtained through legal and authorized channels, and without the customer's explicit authorization or consent, the information will not be used for the collection of debts related to other debtors. We uphold a strict confidentiality policy and do not disclose customer information to unrelated third parties. ● For customers with credit card debts exceeding their repayment capacity but willing to repay, we offer personalized installment plans through mutual negotiation to help address their financial difficulties. ● We have established a dedicated outsourced collection management team, and specified the requirements, operational standards, and collection procedures for outsourced services. We strictly prohibit violent collection practices and ensure customer information security

	and personal rights.
Collection review mechanism	<ul style="list-style-type: none"> ● We have conducted consumer protection audits and specialized business audits on credit card collections to ensure proper implementation of collection policies. Rigorous internal reviews are performed to assess the quality of daily collection activities, monitor employee compliance, and enhance refined management of employee business practices. ● We have maintained strict oversight of outsourced collection agencies, with specific management requirements and rigorous criteria for agency selection, ongoing evaluation, and partnership termination. We set out requirements for the collection process, compliance management, and information security, and conduct annual risk assessments. We have enhanced process management and business guidance for outsourced collection agencies. Regular training and inspections concerning collection scripts and behavior are conducted to ensure the agencies operate in full compliance with legal and regulatory standards.
Specialized collection training	<ul style="list-style-type: none"> ● We have established clear collection training requirements, specifying the content and frequency of both pre-job and ongoing training programs. To assess the effectiveness of these programs, we conduct monthly compliance exams. ● For high-risk employees, we have developed a refresher training program to ensure all collection staff engage in compliant and lawful collection practices, strengthening compliance awareness among employees.

5.2.1.5 Conducting Financial Education Initiatives

Under the theme of "Financial Consumer Protection: Safeguarding Rights and Mitigating Risks", the Bank has actively organized financial education events, including "3.15 World Consumer Rights Day", "Financial Education and Awareness Month", and "Taking on New Missions: Promote Consumer Protection in Counties" campaigns. These initiatives emphasize raising risk awareness "through real-life cases" and highlight continuous financial awareness efforts. The activities feature full employee involvement from executives and employees, informative content, innovative delivery methods, and extensive communication channels, with an emphasis on regional characteristics. We strive to engage consumers in an accessible and enjoyable way, encouraging them to "learn about finance, understand finance, trust finance, and use finance."

Consumer financial awareness activities

<p>Focusing on key groups</p>	<p>We have enhanced financial education for key groups, including the elderly, youth, new urban residents, migrant workers, farmers, people with disabilities, and foreigners in China, fostering a positive social impact.</p> <ul style="list-style-type: none"> ● For the elderly, we offer tailored financial services and education to meet their specific needs. For example, the BoCom Credit Card Center has established a consumer protection education and publicity base at the Zhangjiang Huandong Comprehensive Service Center for the Elderly, guiding local seniors in developing rational consumption and value-driven investment habits. ● For young people, we provide engaging financial literacy programs. For example, the Wuxi Branch partnered with Wuxi University to host the "Financial Festival for College Students: Consumer Protection Carnival". Featuring interactive activities such as anti-fraud talk shows and financial games, the event attracted a large number of students and faculty. ● For new urban residents, we provide case-based risk education to promote practical knowledge of financial products and services. For example, the Hubei Branch conducted financial education sessions in shopping districts like Global Financial City, and the Shandong Branch visited businesses such as Meitai Furniture, educating new urban residents on fraud prevention, rational investment, and secure card usage for merchants and workers. ● For migrant workers and farmers, we conduct financial literacy activities in villages and markets. For example, the Henan Branch used traditional opera performances to educate villagers in Qinggudui Village, Zhongmu County, on eight major consumer rights and prevention of fraudulent claim agents, and broadcasted financial literacy messages through engaging rhyming narratives using village loudspeakers. Additionally, BOCOM International Trust organized financial awareness sessions in Qunguang Village, Baisha Town, Xiaochang County, Xiaogan City, Hubei Province, extending financial education to remote communities. ● For people with disabilities, we take proactive steps to safeguard their financial security. For example, the Shaanxi Branch visited Xi'an Qizhi School, and the Fujian Branch collaborated with the Sanming Disabled Persons' Federation, educating special-needs students on renminbi
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	<p>knowledge and bringing warmth and care to the children.</p> <ul style="list-style-type: none"> ● For foreigners in China, we provide bilingual financial education services. To better serve foreign nationals in China, BoCom has issued bilingual leaflets, such as <i>Eight Major Rights of Financial Consumers</i> and <i>Beware of Risks Associated with Fraudulent Claim Agents</i>. These materials have been widely distributed and promoted by institutions on and outside the Chinese mainland.
Focusing on key regions	<p>We continuously extend our reach to key regions including poverty-stricken areas, remote areas, and ethnic minority regions.</p> <ul style="list-style-type: none"> ● For poverty-stricken areas, we adhere to the principle of "education as the foundation of poverty alleviation." The Yunnan Branch visited Hejiazhai Village, Qingshui Town, Tengchong City, and used village loudspeakers to continuously broadcast information on preventing illegal financial activities in the native tongue of the Lisu villagers. ● For remote areas, we implement targeted and tailored initiatives. During the visit to Zhongxinba Village in Luokeng Town, the Guangdong Branch tailored its educational program to the village's large number of left-behind elderly and children, raising financial awareness through activities such as wall paintings and financial knowledge marketplaces. It also painted a wall mural titled "Illustrated Guide to the Eight Major Consumers Rights". ● For ethnic minority areas, we aim for a sustainable financial education model. The Tibet Branch has formed a financial literacy taskforce to actively engage with nursing homes and welfare institutions in Lhasa, delivering financial literacy and public welfare activities while establishing a regular financial education framework.
Innovating online channels	<p>We have pioneered an online financial education base by introducing a dedicated section in the mobile banking app. The base integrates technologies such as multimodal interaction and 3D digital human modeling, and engages consumers with our digital assistant "Jiaojiao" in interactive financial knowledge Q&A, allowing consumers to learn financial knowledge and anti-fraud tips anywhere, anytime. Since its launch, it has reached nearly 20 million consumers.</p>

Key Performance Highlights:

As of the end of the reporting period,
Online and offline activities conducted: 48,000
Reaching out to financial consumers: 478 million

- **Business Outreach**



On May 28, 2024, the Suzhou Branch organized a financial literacy campaign for employees of Dongnan Elevator Co., Ltd. By distributing informational brochures, delivering presentations, showing short videos, and engaging in interactive activities, the campaign educated employees on topics such as telecom fraud prevention, pension fraud prevention, personal credit, and financial consumer rights and interests.

- **Campus Outreach**

In 2024, the Bank's branches partnered with universities for diverse financial education and awareness initiatives. In collaboration with the Department of Education of Guizhou Province, the Guizhou Branch launched a province-wide campaign to educate college students on financial knowledge and online fraud prevention. During the campaign, the Branch provided in-depth explanations of common online fraud schemes and practical tips on how to safeguard personal financial information.



In collaboration with the PBOC Tao Ping Model Craftsman Innovation Workshop, the Jiangsu

Branch visited Jiangpu Experimental Primary School Binjiang Branch and introduced teachers and students to e-CNY, fraud prevention, and renminbi knowledge through engaging cases and easy-to-understand language.



The Hebei Branch went to universities to educate international students on convenient payment policies.

- **Community Outreach**



In collaboration with the Lixia District Public Security Bureau in Jinan, the Shandong Branch organized a themed performance on financial consumer protection. The event included cultural performances for local residents and the unveiling ceremony of the "Police-Bank Co-building Demonstration Unit". The unit marked a long-term partnership for financial education, with plans to jointly conduct a series of targeted and widely accessible financial education initiatives in the future.



The Henan Branch organized the financial literacy event "Finance for the People, Warmth for the Seniors". To make financial education more engaging, the branch employees wrote and performed the sitcom "That Year, That Day". By blending entertaining storytelling with essential financial knowledge, the performance enabled the audience to learn financial concepts effortlessly in an enjoyable way.



The Guangdong Branch co-organized the "Deaf and Able Together: Financial Knowledge Walk" event at the Haizhu National Wetland Park. The event educated people with hearing impairments about the eight major rights of financial consumers, the three key principles of prudent investment and wealth management, and various financial policies designed to benefit the public.

● **Village Outreach**



The Jiangxi Branch conducted financial literacy activities such as "Financial Knowledge for the

Public," "Financial Knowledge Classroom," and "Financial Knowledge Fair" in local markets, central squares, and other community spaces. The activities educated rural residents on telecom and internet fraud prevention and illegal fundraising risks, and raised awareness of financial services, with the goal of helping grassroots communities "learn about finance, understand finance, trust finance, and use finance."

5.2.2 Strengthening Data Security and Customer Privacy Protection

The Bank regards data assets as one of its most valuable resources and is committed to continuously enhancing data security management to safeguard customer information and privacy, ensuring secure and reliable financial services.

5.2.2.1 Enhancing the Data Security Management Framework

The Bank has built a robust data security governance framework that brings together the Board of Directors, Senior Management, data security coordination teams, and technology departments to ensure a well-coordinated and effective approach to data security management. Following the principle that "business owners are also accountable for their data management and security", we reinforce data security responsibilities across the three lines of defense, ensuring a structured and proactive approach to data risk management and technology safeguards. To strengthen oversight, the Bank has established the Data Governance (Financial Statistics Standardization) Committee under the Senior Management, responsible for allocating necessary resources and overseeing the approval, coordination, and decision-making of major data security matters. Additionally, we have developed a comprehensive policy system, with the Data Security Measures as its foundation. This system covers data classification and grading, risk impact assessments, data transfers beyond the Bank or the Chinese mainland, and emergency response protocols. These policies apply across all business lines, driving ongoing improvements in data security.

Initiatives to ensure data security

End-to-end data security management	<ul style="list-style-type: none">● We have established a comprehensive data security management system that covers pre-usage assessment, real-time monitoring, and post-usage review, ensuring robust protection at every stage of the data lifecycle. We have also strengthened controls in key areas, including data transfers beyond the Bank or the Chinese mainland, and third-party data collaborations. Additionally, security reviews for model data are now integrated into our model risk management framework, reinforcing strict oversight of data usage.
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Data classification	<ul style="list-style-type: none"> ● We have strengthened our data classification and tiered security management framework, ensuring strict implementation of data categorization and security grading requirements.
Risk assessment	<ul style="list-style-type: none"> ● We conduct comprehensive assessments of our data security capabilities, evaluate risks and gaps between our existing security measures and target objectives, and continuously enhance our data security framework.
Contingency management	<ul style="list-style-type: none"> ● We have standardized incident reporting and response protocols, conducting regular security monitoring to promptly identify and mitigate any data security threats. ● Additionally, we conduct emergency drills across our Head Office, Chinese mainland branches and subsidiaries, as well as branches and sub-branches outside the Chinese mainland to strengthen the Group's early warning and response capabilities for data security incidents.
Data management	<ul style="list-style-type: none"> ● We have embedded personal customer information protection requirements into every stage of our business processes—from the establishment and maintenance to the termination of customer relationships. Adhering to the principles of legal compliance and data minimization, we are fully committed to maintaining the highest standards of confidentiality for customer information and other data. ● Before collecting any new customer data, processing bulk sensitive information, or engaging in activities that may significantly impact customers, we conduct data security impact assessments to proactively identify potential risks. ● We ensure clear notification and explicit consent before collecting customer information. ● We collect, use, store, and share customers' personal information strictly in accordance with our customer privacy policy, ensuring that data usage is limited to the minimum extent necessary for business processing. ● When handling sensitive customer information (e.g., facial recognition data), we obtain separate, explicit authorization from the customer before activating such features, in full compliance with legal and regulatory requirements. ● Any sharing of sensitive customer information with external parties requires prior customer consent, except in cases where laws and

	<p>administrative regulations specify otherwise.</p> <ul style="list-style-type: none"> ● We retain personal information in accordance with national and industry regulations, as well as customer agreements. Once the agreed retention period expires, the data is either deleted or anonymized to uphold privacy protection. ● We design data access strategies based on the principle of business necessity and least privilege, ensuring that users only access data within their authorized scope, with sensitive information masked as needed.
Third-party data and privacy management	<ul style="list-style-type: none"> ● We strengthen oversight of third-party data partnerships, ensuring all data collaborations are legally compliant. Technical measures are implemented to safeguard data security, while ongoing supervision and oversight of partners help identify and mitigate potential risks in a timely manner. ● Personal information is collected in the principles of "clear notification, informed consent, and data minimization". We explicitly inform individuals of the purpose, scope, and intended use of their data, obtaining their legal authorization as required.
Information auditing	<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.
Training and publicity	<ul style="list-style-type: none"> ● We provide comprehensive online and in-person training across the Bank to enhance employees' awareness and expertise in data security management.

Initiatives for cybersecurity and data protection

- The Bank has enhanced the security of its mobile banking app on the user side, integrating risk detection and mitigation mechanisms within the operating environment to strengthen protection against attacks and unauthorized access. On the Internet-facing side, we implement full-message encryption, digital signatures, and anti-replay mechanisms, effectively preventing data tampering and loss. Additionally, we adhere to the Security Development Lifecycle (SDLC) framework, embedding security controls at every stage—from requirement gathering and design to development, testing, and deployment. By identifying risks early in the requirement and design phases and incorporating security solutions proactively, we enable early-stage risk mitigation.
- Our "Pay for It" app has successfully passed Cybersecurity Protection Level 3 certification. In accordance with BoCom's data classification and grading framework and tiered protection technical guidelines, we implement comprehensive security measures across all data categories

and sensitivity levels involved in business operations. These measures cover every stage of the data lifecycle, including collection, transmission, storage, usage, sharing, deletion, and destruction. To ensure robust data protection, we employ security mechanisms such as identity authentication, field-level encryption, integrity verification, data masking, network segmentation, perimeter security and monitoring, zoned data storage, virtualization, operational monitoring and auditing, as well as de-identification and anonymization. Additionally, we conduct regular drills to strengthen the Bank's resilience against evolving threats and attacks.

- Our employees complete the Cybersecurity Compliance Training Course via the e-Campus platform, which provides in-depth instruction on data security laws and regulations, including the *Data Security Law of the People's Republic of China* and the *Regulation on Network Data Security Management*.

Key Performance Highlights:

As of the end of the reporting period,

2 meetings of the Data Governance (Financial Statistics Standardization) Committee were held.

No data security incidents occurred.

No incidents of personal data security breaches were recorded.

Honors and Awards:

We achieved level-5 certification in the Data Management Capability Maturity Assessment Model (DCMM), becoming the third commercial bank in China to attain this highest-level certification.

Our "Model and AI Data Security Review and Management Mechanism" was selected as one of the "8th Big Data Galaxy Cases (2024)" by the China Academy of Information and Communications Technology (CAICT) and the Big Data Technical Standards Promotion Committee (TC601) of the China Communications Standards Association (CCSA).

The Bank was recognized as one of the "Top 10 Leading Enterprises in Data Management" by the China Federation of Electronics and Information Industry in 2024.

5.2.2.2 Enhancing Customer Privacy Protection

To further strengthen our customer information protection system, the Bank has introduced policies such as the *Management Measures of BoCom for Tiered Authorization on Personal Customer Information* and the *Management Measures of BoCom for Partner Institution Consumer*

Rights Protection. These policies establish clear authorization protocols, specifying employee access to different tiers of personal customer information based on security classifications. They also set strict guidelines for protecting customer data in external collaborations, ensuring strong privacy safeguards.

Initiatives for customer privacy protection

Enhanced privacy policies	<ul style="list-style-type: none"> ● We have updated the privacy policies for our mobile banking app, "Pay for It" app, and WeChat mini-programs to ensure full compliance with data protection regulations and safeguard customers' lawful rights to personal information. ● The "Pay for It" app strengthens personal data protection by obtaining relevant security certifications and conducting regular self-assessments on data privacy practices.
Clear operational standards	<ul style="list-style-type: none"> ● We have implemented strict protocols for the collection, storage, access, copying, and use of customer information, ensuring that explicit customer consent is obtained before any use or disclosure of their data.
Audits & compliance checks	<ul style="list-style-type: none"> ● Personal information protection has been integrated into the Bank's internal control and risk prevention framework, ensuring comprehensive oversight through Group-wide reviews. ● We also evaluate compliance among partner institutions, ensuring they follow authorized data usage policies, conduct information security impact assessments, properly destroy information after use, and uphold confidentiality obligations.
Personal information protection	<ul style="list-style-type: none"> ● Protecting customer privacy is a top priority. We actively support customers in exercising their data rights by providing accessible and secure options for viewing, modifying, deleting, or withdrawing personal information. Customers can manage their personal data through multiple online and offline channels, including BoCom outlets, the "95559" customer service hotline, and the mobile banking app. ● On the mobile banking app, customers can access, update, or correct their submitted personal information during transactions. They can also retrieve a copy of their data via "Settings > Privacy Management". Requests to delete other personal information can be submitted through online customer service or other available channels. The Bank will verify and process such requests within 15 working days, starting from the next

	business day upon receipt.
Appraisal mechanism	<ul style="list-style-type: none"> The Bank integrates personal customer information protection into its internal control and compliance evaluations, assessing policy implementation, identifying violations, and addressing risk incidents.
Emergency drills	<ul style="list-style-type: none"> Regular emergency drills for personal information security incidents are conducted to help staff familiarize themselves with incident reporting and response procedures, accurately classify risks by type and severity, and strengthen the Bank's incident management capabilities.
Specialized training	<ul style="list-style-type: none"> The Bank provides targeted training on personal customer information protection across its branches and subsidiaries, training over 60,000 employees to strengthen their awareness and expertise in data security.

Key Performance Highlights:

As of the end of the reporting period,

No incidents of customer privacy breaches occurred.

Honors and Awards:

Obtained the "China UnionPay Mobile Payment Product Security Certification", the "Mobile Internet Application Security Certification" and the "Fintech Product Certification".

5.2.3 Empowering Women to Thrive

The Bank is committed to supporting and uplifting women, offering personalized financial products and services to meet their needs. We aim to empower women financially and enhance their overall well-being, helping them lead more fulfilling lives.

Financial Initiatives for Women

Designing exclusive financial products for women	We have introduced a series of credit cards designed for women, including the Girlfriend-themed Card, Crystal Bestie Card, Pop Mart Sweet Bean-themed Card, and UnionPay Standard Traditional Chinese Culture-themed Credit Card. These cards offer unique perks, exclusive gifts, and tailored benefits to appeal to young female customers. In 2024, we issued 63,000 cards in women's series.
Promoting women's health	BoCom (Brazil) supports the Destemidas federal sports project, which organizes sports activities, as well as workshops and discussions on preventing violence for young women in Rio de Janeiro's Maré favela. The program also

	promotes women's health awareness and benefit approximately 80 women in 2024.
Enhancing women's well-being	The BoCom Beijing Branch hosted creative and cultural activities for female employees, including cloisonne enamel painting, cake baking, and traditional tea-making ceremonies, offering them an enjoyable and inspiring time.

5.3 Strengthening Supply Chain Security Through Comprehensive Measures

The Bank strictly adheres to regulations such as the *Management Measures of BoCom for Centralized Procurement* and the *BoCom Supplier Management Measures*. To enhance oversight, we have established the Centralized Procurement Management Committee, which serves as the decision-making and governance body for centralized procurement. This structure is designed to ensure collaboration, vertical integration, and tiered approval, thus fostering a transparent, fair, and integrity-driven supply chain ecosystem. By proactively mitigating environmental and social risks and protecting the legitimate rights and interests of suppliers, the Bank promotes the long-term sustainability of the value chain.

Implementing transparent procurement

- For projects under centralized procurement, the Bank prioritizes open procurement through either public tendering or "open solicitation + non-tendering". Supplier selection is conducted through public channels. Non-open procurement involving recommended candidates requires approval from the Centralized Procurement Management Committee. These measures help foster a transparent, efficient, and competitive procurement environment.
- The Bank strengthens public disclosure of procurement information and carefully monitors the proportion of single-source procurement. It also runs a pre-procurement disclosure system, allowing for public oversight. Procurement results from non-open tendering are promptly published through accessible public channels.
- To increase procurement efficiency, the Bank actively diversifies its supplier base. We strengthen supplier market research, exploring new sourcing strategies and process enhancements to expand market access and diversify supplier resources. Supplier competitiveness is assessed as part of centralized procurement evaluations to promote fair and open competition.

Advancing green procurement

- The Bank incorporates green principles into its procurement policies and processes, prioritizing energy-efficient and environmentally friendly products. "Energy efficiency and environmental protection" are key evaluation criteria in equipment procurement, encouraging

suppliers to adopt sustainable practices.

- The Bank accelerates digital procurement by expanding the use of e-procurement platform, upgrading procurement systems, and developing a digital tendering and bidding subsystem. We also promote online contract signing and digital stamp management, enhancing efficiency while reducing the environmental footprint of procurement activities.

Honors and Awards:

The "BoCom Smart Procurement Mall" was honored with the "Technological Progress Award for Energy Conservation and Carbon Reduction" by the China Energy Conservation Association (CECA).



Protecting the legitimate rights and interests of suppliers

- The Bank has implemented the *Measures of BoCom for Handling Concerns and Complaints about Centralized Procurement*, creating a standardized and efficient response process.
- In compliance with the *Data Security Law* and the *Personal Information Protection Law*, the Bank safeguards supplier business and personal data through staff training, confidentiality agreements, and controlled access measures.
- The Bank upholds honesty and integrity in establishing and honoring supplier contracts, fostering mutually beneficial partnerships and ensuring prompt payments.

Key Performance Highlights:

As of the end of the reporting period,
our Head Office had 43,446 registered suppliers, all of whom comply with the above procurement policies. Supplier distribution by region:
Bohai Rim: 8,140
Yangtze River Delta: 10,418
Pearl River Delta: 5,974
Central China: 7,496
Western China: 7,919
Northeast China: 3,479
Outside the Chinese mainland: 20

5.4 Contributing to Society Through Concrete Actions

BoCom is committed to CSRs and adheres to the *Management Measures of BoCom for External Donations* to actively support public welfare initiatives, strengthen community engagement, and collaborate with all sectors to create a better and more promising future.

Key Performance Highlights:
As of the end of the reporting period:
Donation to charitable causes: RMB 58.8399 million
Number of public welfare projects: 225
Number of employee in volunteering activities: 244,463
Employee volunteer hours: 327, 556

● Cultural Engagement

Case: BoCom (Brazil) renovates historic residence and hosts tea culture exhibition
Established in 1808, the Rio de Janeiro Botanical Garden is one of Brazil's earliest botanical gardens. Within the garden lied the former residence and office of Pacheco Leão, a past director. Over time, the garden fell into disrepair and was forced to close. To commemorate the 50 th anniversary of diplomatic relations between China and Brazil, BoCom (Brazil), in partnership with State Grid, undertook the renovation and preservation of the historic residence in 2024. Beginning in November 2024, the restored site has hosted a tea culture exhibition, offering visitors an immersive experience of the history, traditions, artistry, and evolution of Chinese tea culture.

● Exhibition and Convention Support



From the China International Consumer Products Expo (CICPE) to the China International Fair for Trade in Services (CIFTIS), from the China Import and Export Fair ("Canton Fair") to the China International Import Expo (CIIE), and from Sibos 2024 to the World Artificial Intelligence Conference (WAIC), BoCom's young volunteers have brought enthusiasm and expertise to every event, fostering global connections through their passion and professionalism.

● Disaster Relief

Case: Hunan Branch joins flood relief efforts to protect lives and property

In July 2024, Hunan Province was hit by a severe flood, with Pingjiang County and Huarong County in Yueyang among the hardest-hit areas. In response, employees from BoCom Hunan Branch actively donated to the Yueyang Charity Federation and provided essential relief supplies, including rice, cooking oil, and instant noodles, to support displaced residents at resettlement sites. In addition to delivering aid, the branch engaged with affected communities to understand their financial needs and promote post-disaster financial support policies.



The Xiangtan Branch also contributed by donating relief funds and supplies to support flood response efforts.

● Financial Inclusion for People with Disabilities

Case: Sichuan Branch launches its first charitable trust

In 2024, BoCom Sichuan Branch launched its first charitable trust, raising RMB 110 million, with participation from 71 clients across the Group. The initiative is expected to generate over RMB 100,000 in donations, supporting children with special needs, including those with autism, intellectual disabilities, and developmental disorders. Through this trust, the branch has established a philanthropic platform, encouraging customers to align their wealth with social good while providing community-based education programs to help special-needs children integrate into society.



BoCom collaborated with the China Disabled Persons' Federation (CDPF) to implement accessibility modifications for 100 households with severely disabled members in Qinghai.

● **Educational Assistance**

Case: Hunan Branch's educational aid program

BoCom Hunan Yiyang Branch, in collaboration with the Yiyang Municipal Women's Federation, Yiyang Maternal and Child Health Hospital, and Hunan Arts and Crafts Vocational College, organized the "A Little Red Flower for You" educational initiative at Taozitang Primary School in Changchun Town, Ziyang District. The event provided children with: art classes to encourage creativity; health checkups and psychological screenings for physical and emotional well-being; financial literacy lessons on the origins of money, coin recognition, and the importance of saving.

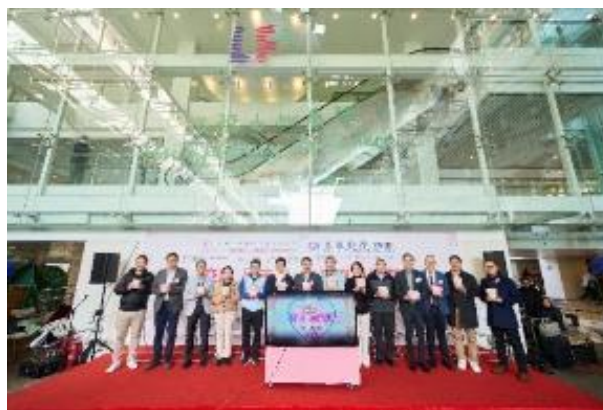


BoCom Xiamen Branch launched a public welfare program to donate books to children.

● **Community Health Support**



On March 5, 2024, BoCom Hainan Branch partnered with the Hainan Provincial Blood Center to launch the "Blood Donation Day Sponsorship" initiative in Haikou, making it the first company in the Hainan Free Trade Port to sponsor an official blood donation day. The branch designated March 5—China's Youth Volunteer Service Day—as the annual BoCom Hainan Branch Blood Donation Day.



On December 22, 2024, BoCom (Hong Kong), in cooperation with the Community Medical and Education Services Association (HK), successfully hosted the "Community Care Program: Kick-off Ceremony for Free Clinics in Kowloon". This initiative aimed to help local residents gain a better understanding of their health conditions and enhance their awareness of disease prevention.

- **Ecological Protection**

Case: Qinghai Branch's donations to Three-River-Source National Park

To promote green development, BoCom Qinghai Branch is actively advancing ecological conservation and supporting Qinghai's goal of becoming a model province for national park development. As part of its commitment to protecting the headwaters of the Yangtze, Yellow, and Lancang Rivers, the branch had donated RMB 2 million to the Sanjiangyuan Ecological Protection Foundation as of the end of the reporting period. These funds aim to improve the working and living conditions of ecological protection workers in high-altitude areas, ensuring stronger support for China's environmental conservation efforts.

Case: Tibet Branch's public tree-planting initiative

From April 26 to May 6, 2024, BoCom Tibet Branch organized an online tree-planting initiative as part of the Nanbeishan Greening Project in Lhasa, under the theme "Sponsor a Tree". Employees actively participated by funding and planting trees, contributing to the region's afforestation efforts and supporting the vision of a greener, more sustainable Tibet.

Independent Assurance Statement



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有限保证的注册会计师独立鉴证报告

毕马威华振通字第 2500091 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《2024 年社会责任 (ESG) 报告》(以下简称 “《社会责任 (ESG) 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《社会责任 (ESG) 报告》中选定的 2024 年度关键数据 (即《社会责任 (ESG) 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《社会责任 (ESG) 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、专业胜任能力及应有的关注、保密和良好的职业行为为基本原则。

KPMG Huazhen LLP, a People's Republic of China partnership and a member firm of the KPMG global organisation of independent member firms affiliated with KPMG International Limited ("KPMG International"), a private English company limited by guarantee.

毕马威华振会计师事务所(特殊普通合伙) — 中国合伙制会计师事务所, 是与美国私营担保有限公司 — 毕马威国际有限公司 (“毕马威国际”) 相关联的独立成员所全球性组织中的成员。



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《社会责任 (ESG) 报告》关键数据的相关部门进行访谈；
- 2) 对《社会责任 (ESG) 报告》关键数据实施分析程序；
- 3) 对《社会责任 (ESG) 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：2025 年 3 月 21 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 in 18 countries and regions, 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.Central and western China refers to the 18 provinces, autonomous regions, and municipalities of Shanxi Province, Inner Mongolia Autonomous Region, Anhui Province, Jiangxi Province, Henan Province, Hubei Province, Hunan Province, Guangxi Zhuang Autonomous Region, Chongqing Municipality, Sichuan Province, Guizhou Province, Yunnan Province, Shaanxi Province Gansu Province, Ningxia Hui Autonomous Region, Xinjiang Uyghur Autonomous Region, Tibet Autonomous Region and Qinghai Province.

4.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.

5.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.

6.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".

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

8.Outstanding loans to clean energy industries are the total outstanding loans to industries of new energy and clean energy equipment manufacturing, building and operation of clean energy facilities, clean and efficient use of traditional energy resources, and efficient operation of energy systems granted by branches in the Chinese mainland. They were calculated according to the standards of the People's Bank of China.

9.Outstanding green loans are the total outstanding loans to energy conservation and environmental protection industry, clean production industry, clean energy industry, ecological environment industry, green upgrading of infrastructure, and green services granted by branches in the Chinese mainland. They were calculated according to the standards of the People's Bank of China.

10.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.

11. "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 natural gas consumption and electricity consumption. 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.

12.The data on bank-wide video conferences refer to the number of meetings held using television and telephone to transmit sound and images in real-time between users in two or more locations.

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

14.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: $SCVPS = \text{earnings per share} + (\text{taxes} + \text{staff cost} + \text{interest expense} + \text{total public welfare investment}) / \text{total share capital at the end of the period}$.

15.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.

16.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.

17.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 Organizations*.

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

Statement of Greenhouse Gas and Environmental Data

This statement focuses on

Bank Of Communications Co.,Ltd.

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

and covers the greenhouse gas emissions and main environmental data of Bank Of Communications Co.,Ltd. globally in the period 1st January 2024 – 31st December 31 2024.

Energy consumption		2024
Gasoline consumption (L)		3,025,557
Diesel consumption (L)		186,090
Natural gas consumption (10 ⁴ Nm ³)		586
Liquefied petroleum Gas Consumption (t)		9.64
Methanol consumption (t)		8.457
Electricity consumption (MWh)		760,385
Heat consumption (GJ)		526,795
Comprehensive energy consumption (tce)		101,247
Greenhouse gas emissions		2024
Total greenhouse gas emissions for Scope I and Scope II (tCO ₂ e)		487,403
Among which	Greenhouse gas emissions for Scope I (tCO ₂ e)	19,935
	Greenhouse gas emissions for Scope II (tCO ₂ e)	467,468
Other environmental footprint		2024
Office paper quantity (t)		1,785
Quantity of water use (t)		3,678,793
Quantity of water drainage (t)		3,310,914
Quantity of water consumption (t)		367,879
Total discharge amount of harmless waste (t)		8,858

Greenhouse gas accounting is based on the accounting scope proposed in ISO14064-1 "Greenhouse gases - Part 1: Specification with guidance at the organization level for quantification and reporting of greenhouse gas emissions and removals" and the "Greenhouse Gas Protocol" issued by the World Resources Institute (WRI). Based on the nature of Bank Of Communications Co.,Ltd., this statement uses the emission factors provided in "the Accounting Methods and Reporting Guidelines for Greenhouse Gas Emissions of Public Building Operating Enterprises (Trial)", "2006 IPCC Guidelines for National Greenhouse Gas Inventories" and "2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories", the latest average carbon dioxide emission factors of China's power grid, and the latest electric power emission factors issued by local governments abroad.

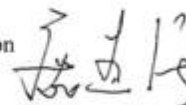
CECEP Hundred Technical Service (Beijing) Co., Ltd.

1607, 16th Floor, No.42, Xizhimen North

Street, Haidian District, Beijing

Date of declaration: March 6, 2025

Signature of person
in charge



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 (Effective from January 1, 2025)</i>
About This Report	Articles 4/6	Reporting Principles / Reporting Scope
Message from the Leadership	/	/
About BoCom	/	/
Governance: Upholding Resilient Operations		
Optimizing Corporate Governance	Articles 12	/
Upholding Business Ethics	Articles 55/56	B7/B7.1/B7.2/B7.3
Preventing Financial Risks	/	/
Improving Compliance Management	/	/
Strengthening CSR Management	Article 5/9/11/18/53	Governance structure
Economy: Contributing to the Real Economy		
Supporting the Real Economy	/	/
Facilitating the Implementation of National Strategies	/	/
Advancing Inclusive Finance	/	/
Contributing to Rural Revitalization	Article 39	/
Safeguarding a Better Life	/	/
Innovating Digital Finance	Articles 42/43	/

Environment: Making New Ecological Progress		
Empowering Low-Carbon and Green Development Through Finance	Articles 21/22/23/28/32/33	D16/D19/D20/D21/D22/D23/D24/D25/D26/D27/D28/D29/D30/D31/D32/D33/D34/D35/D36/D37/D38/D39/D40/D41
Practicing Low-Carbon Operations to Lead the Green Transformation	Articles 20/24/25/26/27/29/30/31/34-37	A1/A1.1/A1.3/A1.4/A1.5/A1.6/A2.1/A2.2/A2.3/A2.4/A2.5/A3/A3.1/D17/D18
Society: Working Together for a Sustainable Future		
Working Together to Foster Employee Growth	Article 50	B1/B1.1/B1.2/B2/B2.1/B2.2/B2.3/B3/B3.1/B3.2/B4/B4.1/B4.2
Enhancing Customer Experience with Dedicated Efforts	Articles 47/48	B6/B6.2/B6.3/B6.5
Strengthening Supply Chain Security Through Comprehensive Measures	Articles 45/46	B5/B5.1/B5.2/B5.3/B5.4
Contributing to Society Through Concrete Actions	Article 40	B8/B8.1/B8.2

Note:

1. "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.
2. "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.

GRI Content Index

Statement	BoCom reported the information referenced in this "GRI Content Index" for the period of January 2024 to December 2024, 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	Optimizing Corporate Governance
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 This Report
2-5	External assurance	Independent Assurance Statement
2-6	Activities, value chain and other business relationships	Strengthening Supply Chain Security Through Comprehensive Measures
2-7	Employees	Working Together to Foster Employee Growth
2-9	Governance structure and composition	Optimizing Corporate Governance
2-10	Nomination and selection of the highest governance body	Optimizing Corporate Governance
2-11	Chair of the highest governance body	Optimizing Corporate Governance
2-12	Role of the highest governance body in overseeing the management of impacts	Strengthening CSR Management
2-13	Delegation of responsibility for managing impacts	Strengthening CSR Management
2-14	Role of the highest governance body in sustainability reporting	Strengthening CSR Management
2-15	Conflicts of interest	Optimizing Corporate Governance

		Governance
2-16	Communication of critical concerns	Strengthening CSR Management
2-17	Collective knowledge of the highest governance body	Message from the Leadership
2-18	Evaluation of the performance of the highest governance body	Optimizing Corporate Governance
2-19	Remuneration policies	Working Together to Foster Employee Growth
2-20	Process to determine remuneration	Working Together to Foster Employee Growth
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	Strengthening CSR Management
2-26	Mechanisms for seeking advice and raising concerns	Strengthening CSR Management
2-27	Compliance with laws and regulations	Strengthening CSR Management
2-28	Membership associations	Strengthening CSR Management
2-29	Approach to stakeholder engagement	Strengthening CSR Management
2-30	Collective bargaining agreements	Strengthening CSR Management
GRI 3: Material Topics 2021		
3-1	Process to determine material topics	Strengthening CSR Management
3-2	List of material topics	Strengthening CSR Management
3-3	Management of material topics	Strengthening CSR Management
Economy		
GRI 201: Economic Performance 2016		
201-1	Direct economic value generated and distributed	Contributing to Rural Revitalization
201-2	Financial implications and other risks and opportunities due to climate change	Addressing Climate Change
201-3	Defined benefit plan obligations and other retirement plans	Working Together to Foster Employee Growth

GRI 203: Indirect Economic Impacts 2016		
203-1	Infrastructure investments and services supported	Facilitating the Implementation of National Strategies
203-2	Significant indirect economic impacts	Facilitating the Implementation of National Strategies
GRI 205: Anti-corruption 2016		
205-1	Operations assessed for risks related to corruption	Upholding Business Ethics
205-2	Communication and training about anti-corruption policies and procedures	Upholding Business Ethics
205-3	Confirmed incidents of corruption and actions taken	Upholding Business Ethics
Environment		
GRI 301: Materials 2016		
301-1	Materials used by weight or volume	Practicing Low-Carbon Operations to Lead the Green Transformation
GRI 302: Energy 2016		
302-1	Energy consumption within the organization	Practicing Low-Carbon Operations to Lead the Green Transformation
302-3	Energy intensity	Practicing Low-Carbon Operations to Lead the Green Transformation
302-4	Reduction of energy consumption	Practicing Low-Carbon Operations to Lead the Green Transformation
302-5	Reductions in energy requirements of products and services	Practicing Low-Carbon Operations to Lead the Green Transformation
GRI 303: Water and Effluents 2018		
303-1	Interactions with water as a shared resource	Practicing Low-Carbon Operations to Lead the Green Transformation
303-2	Management of water discharge-related impacts	Practicing Low-Carbon

		Operations to Lead the Green Transformation
303-3	Water withdrawal	Practicing Low-Carbon Operations to Lead the Green Transformation
303-4	Water discharge	Practicing Low-Carbon Operations to Lead the Green Transformation
303-5	Water consumption	Practicing Low-Carbon Operations to Lead the Green Transformation
GRI 304: Biodiversity 2016		
304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	Empowering Low-Carbon and Green Development Through Finance
304-2	Significant impacts of activities, products and services on biodiversity	Empowering Low-Carbon and Green Development Through Finance
304-3	Habitats protected or restored	Empowering Low-Carbon and Green Development Through Finance
GRI 305: Emissions 2016		
305-1	Direct (Scope 1) GHG emissions	Empowering Low-Carbon and Green Development Through Finance
305-2	Energy indirect (Scope 2) GHG emissions	Empowering Low-Carbon and Green Development Through Finance
305-4	GHG emissions intensity	Practicing Low-Carbon Operations to Lead the Green Transformation
305-5	Reduction of GHG emissions	Practicing Low-Carbon Operations to Lead the Green Transformation

305-7	Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	Practicing Low-Carbon Operations to Lead the Green Transformation
GRI 306: Waste 2020		
306-1	Waste generation and significant waste-related impacts	Practicing Low-Carbon Operations to Lead the Green Transformation
306-2	Management of significant waste-related impacts	Practicing Low-Carbon Operations to Lead the Green Transformation
306-3	Waste generated	Practicing Low-Carbon Operations to Lead the Green Transformation
306-4	Waste diverted from disposal	Practicing Low-Carbon Operations to Lead the Green Transformation
306-5	Waste directed to disposal	Practicing Low-Carbon Operations to Lead the Green Transformation
GRI 308: Supplier Environmental Assessment 2016		
308-1	New suppliers that were screened using environmental criteria	Strengthening Supply Chain Security Through Comprehensive Measures
308-2	Negative environmental impacts in the supply chain and actions taken	Strengthening Supply Chain Security Through Comprehensive Measures
Social		
GRI 401: Employment 2016		
401-1	New employee hires and employee turnover	Working Together to Foster Employee Growth
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Working Together to Foster Employee Growth
GRI 403: Occupational Health and Safety 2018		
403-1	Occupational health and safety management	Working Together to Foster

	system	Employee Growth
403-2	Hazard identification, risk assessment, and incident investigation	Working Together to Foster Employee Growth
403-3	Occupational health services	Working Together to Foster Employee Growth
403-4	Worker participation, consultation, and communication on occupational health and safety	Working Together to Foster Employee Growth
403-5	Worker training on occupational health and safety	Working Together to Foster Employee Growth
403-6	Promotion of worker health	Working Together to Foster Employee Growth
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Working Together to Foster Employee Growth
403-8	Workers covered by an occupational health and safety management system	Working Together to Foster Employee Growth
403-9	Work-related injuries	Working Together to Foster Employee Growth
403-10	Work-related ill health	Working Together to Foster Employee Growth
GRI 404: Training and Education 2016		
404-1	Average hours of training per year per employee	Working Together to Foster Employee Growth
404-2	Programs for upgrading employee skills and transition assistance programs	Working Together to Foster Employee Growth
404-3	Percentage of employees receiving regular performance and career development reviews	Working Together to Foster Employee Growth
GRI 405: Diversity and Equal Opportunity 2016		
405-1	Diversity of governance bodies and employees	Working Together to Foster Employee Growth
405-2	Ratio of basic salary and remuneration of women to men	Working Together to Foster Employee Growth
GRI 406: Non-discrimination 2016		
406-1	Incidents of discrimination and corrective actions	Working Together to Foster

	taken	Employee Growth
GRI 413: Local Communities 2016		
413-1	Operations with local community engagement, impact assessments, and development programs	Contributing to Society Through Concrete Actions
GRI 414: Supplier Social Assessment 2016		
414-1	New suppliers that were screened using social criteria	Strengthening Supply Chain Security Through Comprehensive Measures
414-2	Negative social impacts in the supply chain and actions taken	Strengthening Supply Chain Security Through Comprehensive Measures
GRI 416: Customer Health and Safety 2016		
416-1	Assessment of the health and safety impacts of product and service categories	Enhancing Customer Experience with Dedicated Efforts
GRI 417: Marketing and Labeling 2016		
417-1	Requirements for product and service information and labeling	Enhancing Customer Experience with Dedicated Efforts
417-2	Incidents of non-compliance concerning product and service information and labeling	Enhancing Customer Experience with Dedicated Efforts
417-3	Incidents of non-compliance concerning marketing communications	Enhancing Customer Experience with Dedicated Efforts
GRI 418: Customer Privacy 2016		
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Enhancing Customer Experience with Dedicated Efforts

