Artificial Intelligence Governance Policy

The Shanghai Commercial & Savings Bank, Ltd. (the Bank) adopted this Artificial Intelligence Governance Policy at the 10th Meeting of the 22nd Board of Directors held on August 28, 2026.

The Bank is committed to the responsible adoption and governance of Artificial Intelligence (AI) in accordance with the following principles:

1. Establish governance and accountability mechanisms.
2. Promote fairness and human-centric values.
3. Protect privacy and customers' rights and interests.
4. Ensure system robustness and security.
5. Enhance transparency and explain ability.
6. Promote sustainable development.

The Bank is committed to maintaining meaningful human oversight over AI systems, clearly defining the appropriate scope of AI applications, mitigating model bias, encouraging environmentally responsible AI practices with minimal ecological impact, and prohibiting the deployment or use of AI models that are illegal or unethical.

Artificial Intelligence Management Plan:

The Bank hereby declares its Artificial Intelligence Management Plan (including Generative Artificial Intelligence (GenAI), collectively referred to as AI) as follows:

1. Compliance with Applicable Requirements
   The Bank's AI governance measures shall comply with applicable laws and regulations, supervisory guidance, and the requirements set forth in the Bank's Artificial Intelligence Governance Policy.

2. AI Lifecycle Governance
   The Bank shall establish governance and control mechanisms covering every stage of the AI lifecycle to ensure the effective implementation and ongoing maintenance of AI systems, thereby fostering a data-driven decision-making culture.

3. Information Security and Data Protection
   When applying AI technologies, the Bank shall strictly comply with all applicable internal and external requirements relating to information security, personal data protection, intellectual property rights, and information usage. Unauthorized biometric information shall not be used as a data source.

4. AI Governance Organization

The Bank shall establish an AI governance organization responsible for overseeing AI applications.
The organization shall periodically assess model drift, performance degradation, neutrality, and potential bias in AI models, and shall supervise AI applications to prevent unfair outcomes caused by algorithmic bias while ensuring compliance with the Fair Customer Treatment Principles applicable to the financial services industry.

5. Fair and Lawful Data Management
   During the development of AI models and the provision of AI-enabled financial services, data collection and processing shall be conducted fairly and lawfully.The Bank shall ensure that data is collected through legitimate means and processed in accordance with the principle of data minimization.
   Customer information shall be appropriately managed and protected. Where customer disputes arise, they shall be handled through the Bank’s complaint handling mechanisms in accordance with the Fair Customer Treatment Principles for financial institutions.

6. Third-party Risk Management
   Where AI-related services are introduced through third-party service providers, the Bank shall exercise appropriate risk management and oversight over such providers.
   The Bank shall encourage environmentally responsible AI practices with minimal ecological impact and shall conduct objective risk assessments and appropriate controls over AI-generated outputs.

7. Employee Training and Transparency
   The Bank shall provide Employees with appropriate training on the secure and ethical use of AI to enable them to adapt to the changes brought about by AI technologies.
   The Bank shall also make appropriate disclosures regarding AI applications to enable stakeholders to understand how AI systems operate.

8. Sustainable Development
   The Bank shall ensure that its AI development strategies and implementation are aligned with the principles of sustainable development. Such efforts include reducing economic and social inequalities, protecting the natural environment, promoting inclusive growth, supporting sustainable development, and enhancing social well-being.