



上海商業銀行  
SHANGHAI COMMERCIAL BANK

## REGULATORY DISCLOSURES

As at 31 December 2025  
(Unaudited)



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# SHANGHAI COMMERCIAL BANK LIMITED

(All amounts in HK dollar thousands unless otherwise stated)

The following disclosures are prepared under regulatory scope of consolidation to comply with the Banking (Disclosure) Rules and do not form part of the audited financial statements.

## 1 Key prudential ratios

	31 December 2025	30 September 2025	30 June 2025	31 March 2025	31 December 2024
<b>Regulatory capital (amount)</b>					
1 & 1a Common Equity Tier 1 (CET1)	36,604,045	36,120,469	35,914,608	35,785,873	34,677,399
2 & 2a Tier 1	36,604,045	36,120,469	35,914,608	35,785,873	34,677,399
3 & 3a Total capital	40,776,278	40,293,773	40,143,946	39,721,502	38,593,247
<b>Risk Weighted Amounts (RWA)</b>					
4 Total RWA	134,102,176	135,517,581	139,971,549	143,290,035	138,045,799
4a Total RWA (pre-floor)	134,102,176	135,517,581	139,971,549	143,290,035	N/A
<b>Risk-based regulatory capital ratios (as a percentage of RWA)</b>					
5 & 5a CET1 ratio (%)	27.3%	26.7%	25.7%	25.0%	25.1%
5b CET1 ratio (%) (pre-floor ratio)	27.3%	26.7%	25.7%	25.0%	N/A
6 & 6a Tier 1 ratio (%)	27.3%	26.7%	25.7%	25.0%	25.1%
6b Tier 1 ratio (%) (pre-floor ratio)	27.3%	26.7%	25.7%	25.0%	N/A
7 & 7a Total capital ratio (%)	30.4%	29.7%	28.7%	27.7%	28.0%
7b Total capital ratio (%) (pre-floor ratio)	30.4%	29.7%	28.7%	27.7%	N/A
<b>Additional CET1 buffer requirements (as a percentage of RWA)</b>					
8 Capital conservation buffer requirement (%)	2.5%	2.5%	2.5%	2.5%	2.5%
9 Countercyclical capital buffer requirement (%)	0.34%	0.33%	0.33%	0.32%	0.34%
10 Higher loss absorbency requirements (%) (applicable only to G-SIBs or D-SIBs)	N/A	N/A	N/A	N/A	N/A
11 Total AI-specific CET1 buffer requirements (%)	2.8%	2.8%	2.8%	2.8%	2.8%
12 CET1 available after meeting the AI's minimum capital requirements (%)	21.3%	20.7%	19.7%	19.0%	19.1%
<b>Basel III leverage ratio</b>					
13 Total leverage ratio (LR) exposure measure	230,451,324	233,365,846	232,639,558	235,198,481	231,925,255
13a LR exposure measure based on mean values of gross assets of SFTs	230,606,759	232,574,542	232,661,536	235,277,888	N/A
14, 14a & 14b LR (%)	15.9%	15.5%	15.4%	15.2%	15.0%
14c & 14d LR (%) based on mean values of gross assets of SFTs	15.9%	15.5%	15.4%	15.2%	N/A
<b>Liquidity Coverage Ratio (LCR)/Liquidity Maintenance Ratio (LMR)</b>					
Applicable to category 1 institutions only:					
15 Total high quality liquid assets (HQLA)	N/A	N/A	N/A	N/A	N/A
16 Total net cash outflows	N/A	N/A	N/A	N/A	N/A
17 LCR (%)	N/A	N/A	N/A	N/A	N/A
Applicable to category 2 institutions only:					
17a LMR (%)	83.7%	82.3%	76.5%	76.5%	76.8%
<b>Net Stable Funding Ratio (NSFR)/Core Funding Ratio (CFR)</b>					
Applicable to category 1 institutions only:					
18 Total available stable funding	N/A	N/A	N/A	N/A	N/A
19 Total required stable funding	N/A	N/A	N/A	N/A	N/A
20 NSFR (%)	N/A	N/A	N/A	N/A	N/A
Applicable to category 2A institutions only:					
20a CFR (%)	282.6%	308.4%	295.6%	303.7%	295.9%

# SHANGHAI COMMERCIAL BANK LIMITED

(All amounts in HK dollar thousands unless otherwise stated)

## 2 Capital structure and adequacy

The calculation of the capital adequacy ratio as at 31 December 2025 is based on the Banking (Capital) Rules ("BCR"). The capital adequacy ratio represents the consolidated ratio of the Bank's Hong Kong offices and its branches outside Hong Kong, Shacom Property (CA), Inc., Shacom Property (NY), Inc., Shacom Property Holdings (BVI) Limited, Shacom Investment Limited, Shacom Assets Investments Limited, Right Honour Investments Limited, Glory Step Westpoint Investments Limited, Silver Wisdom Westpoint Investments Limited, Shacom Insurance Brokers Limited, KCC 23F Limited, KCC 25F Limited, and KCC 26F Limited computed in accordance with Section 3C(1) of the BCR.

For accounting purposes, the basis of consolidation is described in Note 2.2 to the consolidated financial statements.

The Group uses the standardized (credit risk) approach, standardized (market risk) approach, revised standardized approach and reduced basic CVA approach under BCR for credit risk, market risk, operational risk and CVA risk respectively. The Group operates subsidiaries in different countries where capital is governed by local rules and there may be restrictions on the transfer of funds or regulatory capital between members of the Group.

The table below shows the balance sheet based on accounting scope of consolidation and the regulatory scope of consolidation, and the reconciliation of the capital components from balance sheet based on regulatory scope of consolidation to the Composition of Regulatory Capital as at 31 December 2025.

### Reconciliation of regulatory capital to balance sheet

	Balance sheet as in published financial statements as at 31 December 2025	Under regulatory scope of consolidation as at 31 December 2025	Cross-referenced to Composition of Regulatory Capital
<b>Assets</b>			
Cash and balances with banks	37,645,746	37,644,023	
<i>of which: Stage 1 and Stage 2 impairment allowances reflected in regulatory capital</i>	–	(722)	(1)
Placements with and advances to banks	41,142,419	41,142,419	
<i>of which: Stage 1 and Stage 2 impairment allowances reflected in regulatory capital</i>	–	(805)	(2)
Loans and advances to customers	67,275,776	67,275,776	
<i>of which: Stage 1 and Stage 2 impairment allowances reflected in regulatory capital</i>	–	(711,869)	(3)
Financial assets at fair value through profit or loss	155,272	121,026	
<i>of which: insignificant capital investments in financial sector entities exceeding 10% threshold</i>	–	5,319	(4)
Derivative financial instruments	499,949	499,949	
Investment securities at fair value through other comprehensive income	68,326,253	68,067,222	
<i>of which: insignificant capital investments in financial sector entities exceeding 10% threshold</i>	–	1,662,292	(5)
Investment securities at amortized cost	4,739,101	4,739,101	
<i>of which: Stage 1 and Stage 2 impairment allowances reflected in regulatory capital</i>	–	(35)	(6)
Properties for sale	336,511	336,511	
Investments in associates and joint venture	365,679	43,000	
Investments in and amounts due from subsidiaries	–	302,777	
<i>of which: Stage 1 and Stage 2 impairment allowances reflected in regulatory capital</i>	–	(34,774)	(7)
Properties and equipment	2,203,270	2,203,270	
Investment properties	982,161	982,161	
Intangible assets	72,648	101,110	(8)
Current income tax assets	243,544	243,544	
Deferred income tax assets	1,050,441	1,055,858	(9)
Other assets	2,464,950	2,332,081	
<i>of which: Stage 1 and Stage 2 impairment allowances reflected in regulatory capital</i>	–	(2,978)	(10)
<b>Total assets</b>	<b>227,503,720</b>	<b>227,089,828</b>	

# SHANGHAI COMMERCIAL BANK LIMITED

(All amounts in HK dollar thousands unless otherwise stated)

## 2 Capital structure and adequacy (Continued)

### Reconciliation of regulatory capital to balance sheet (Continued)

	Balance sheet as in published financial statements as at 31 December 2025	Under regulatory scope of consolidation as at 31 December 2025	Cross-referenced to Composition of Regulatory Capital
<b>Liabilities</b>			
Deposits and balances from banks	4,866,038	4,866,038	
Deposits from customers	175,133,015	175,133,015	
Derivative financial instruments	500,469	500,469	
Amounts due to subsidiaries	–	468,290	
Subordinated debts	2,702,108	2,702,108	(11)
Other liabilities	3,127,750	2,921,760	
<i>of which: Stage 1 and Stage 2 impairment allowances reflected in regulatory capital</i>	–	66,380	(12)
Current income tax liabilities	127,201	120,223	
Deferred income tax liabilities	11,195	11,150	
<b>Total liabilities</b>	<b>186,467,776</b>	<b>186,723,053</b>	
<b>Equity</b>			
Share capital	2,000,000	2,000,000	(13)
Retained earnings	26,846,121	26,331,929	(14)
Reserves	12,056,153	12,034,846	
<i>of which: accumulated other comprehensive income/(loss), other than regulatory reserve</i>	–	11,099,651	(15)
<i>regulatory reserve</i>	–	935,195	(16)
Non-controlling interests in equity	133,670	–	
<b>Total equity</b>	<b>41,035,944</b>	<b>40,366,775</b>	
<b>Total equity and liabilities</b>	<b>227,503,720</b>	<b>227,089,828</b>	

# SHANGHAI COMMERCIAL BANK LIMITED

(All amounts in HK dollar thousands unless otherwise stated)

## 2 Capital structure and adequacy (Continued)

### Composition of regulatory capital

The Composition of Regulatory Capital as at 31 December 2025 is shown below:

	Component of regulatory capital reported by bank	Cross-referenced to balance sheet under regulatory scope of consolidation
<b>CET1 capital: instruments and reserves</b>		
1	Directly issued qualifying CET1 capital instruments plus any related share premium	2,000,000 (13)
2	Retained earnings	26,331,929 (14)
3	Disclosed reserves	12,034,846 (15) + (16)
5	Minority interests arising from CET1 capital instruments issued by consolidated bank subsidiaries and held by third parties (amount allowed in CET1 capital of the consolidation group)	-
6	<b>CET1 capital before regulatory deductions</b>	<b>40,366,775</b>
<b>CET1 capital: regulatory deductions</b>		
7	Valuation adjustments	2,956
8	Goodwill (net of associated deferred tax liabilities)	-
9	Other intangible assets (net of associated deferred tax liabilities)	101,110 (8)
10	Deferred tax assets (net of associated deferred tax liabilities)	1,055,858 (9)
11	Cash flow hedge reserve	-
12	Excess of total EL amount over total eligible provisions under the IRB approach	-
13	Credit-enhancing interest-only strip, and any gain-on-sale and other increase in the CET1 capital arising from securitization transactions	-
14	Gains and losses due to changes in own credit risk on fair valued liabilities	-
15	Defined benefit pension fund net assets (net of associated deferred tax liabilities)	-
16	Investments in own CET1 capital instruments (if not already netted off paid-in capital on reported balance sheet)	-
17	Reciprocal cross-holdings in CET1 capital instruments	-
18	Insignificant LAC investments in CET1 capital instruments issued by financial sector entities that are outside the scope of regulatory consolidation (amount above 10% threshold)	1,667,611 (4) + (5)
19	Significant LAC investments in CET1 capital instruments issued by financial sector entities that are outside the scope of regulatory consolidation (amount above 10% threshold)	-
20	Mortgage servicing rights (net of associated deferred tax liabilities)	Not applicable Not applicable
21	Deferred tax assets arising from temporary differences (net of associated deferred tax liabilities)	Not applicable Not applicable
22	Amount exceeding the 15% threshold	Not applicable Not applicable
23	of which: significant investments in the ordinary share of financial sector entities	Not applicable Not applicable

# SHANGHAI COMMERCIAL BANK LIMITED

(All amounts in HK dollar thousands unless otherwise stated)

## 2 Capital structure and adequacy (Continued)

### Composition of regulatory capital (Continued)

		Component of regulatory capital reported by bank	Cross-referenced to balance sheet under regulatory scope of consolidation
24	of which: mortgage servicing rights	Not applicable	Not applicable
25	of which: deferred tax assets arising from temporary differences	Not applicable	Not applicable
26	National specific regulatory adjustments applied to CET1 capital	935,195	
26a	Cumulative fair value gains arising from the revaluation of land and buildings (own-use and investment properties)	–	
26b	Regulatory reserve for general banking risks	935,195	(16)
26c	Securitization exposures specified in a notice given by the Monetary Authority	–	
26d	Cumulative losses below depreciated cost arising from the institution's holdings of land and buildings	–	
26e	Capital shortfall of regulated non-bank subsidiaries	–	
26f	Capital investment in a connected company which is a commercial entity (amount above 15% of the reporting institution's capital base)	–	
27	Regulatory deductions applied to CET1 capital due to insufficient AT1 capital and Tier 2 capital to cover deductions	–	
28	<b>Total regulatory deductions to CET1 capital</b>	<b>3,762,730</b>	
29	<b>CET1 capital</b>	<b>36,604,045</b>	
<b>AT1 capital: instruments</b>			
30	Qualifying AT1 capital instruments plus any related share premium	–	
31	of which: classified as equity under applicable accounting standards	–	
32	of which: classified as liabilities under applicable accounting standards	–	
34	AT1 capital instruments issued by consolidated bank subsidiaries and held by third parties (amount allowed in AT1 capital of the consolidation group)	–	
36	<b>AT1 capital before regulatory deductions</b>	<b>–</b>	
<b>AT1 capital: regulatory deductions</b>			
37	Investments in own AT1 capital instruments	–	
38	Reciprocal cross-holdings in AT1 capital instruments	–	
39	Insignificant LAC investments in AT1 capital instruments issued by financial sector entities that are outside the scope of regulatory consolidation (amount above 10% threshold)	–	
40	Significant LAC investments in AT1 capital instruments issued by financial sector entities that are outside the scope of regulatory consolidation	–	
41	National specific regulatory adjustments applied to AT1 capital	–	
42	Regulatory deductions applied to AT1 capital due to insufficient Tier 2 capital to cover deductions	–	
43	<b>Total regulatory deductions to AT1 capital</b>	<b>–</b>	
44	<b>AT1 capital</b>	<b>–</b>	
45	<b>Tier 1 capital (Tier 1 = CET1 + AT1)</b>	<b>36,604,045</b>	

# SHANGHAI COMMERCIAL BANK LIMITED

(All amounts in HK dollar thousands unless otherwise stated)

## 2 Capital structure and adequacy (Continued)

### Composition of regulatory capital (Continued)

		Component of regulatory capital reported by bank	Cross-referenced to balance sheet under regulatory scope of consolidation
<b>Tier 2 capital: instruments and provisions</b>			
46	Qualifying Tier 2 capital instruments plus any related share premium	2,702,108	(11)
48	Tier 2 capital instruments issued by consolidated bank subsidiaries and held by third parties (amount allowed in Tier 2 capital of the consolidation group)	–	
50	Collective provisions and regulatory reserve for general banking risks eligible for inclusion in Tier 2 capital	1,470,125	
51	<b>Tier 2 capital before regulatory deductions</b>	<b>4,172,233</b>	
<b>Tier 2 capital: regulatory deductions</b>			
52	Investments in own Tier 2 capital instruments	–	
53	Reciprocal cross-holdings in Tier 2 capital instruments and non-capital LAC liabilities	–	
54	Insignificant LAC investments in Tier 2 capital instruments issued by, and non-capital LAC liabilities of, financial sector entities that are outside the scope of regulatory consolidation (amount above 10% threshold and, where applicable, 5% threshold)	–	
54a	Insignificant LAC investments in non-capital LAC liabilities of financial sector entities that are outside the scope of regulatory consolidation (amount formerly designated for the 5% threshold but no longer meets the conditions) (for institutions defined as “section 2 institution” under § 2(1) of Schedule 4F to BCR only)	–	
55	Significant LAC investments in Tier 2 capital instruments issued by financial sector entities that are outside the scope of regulatory consolidation (net of eligible short positions)	–	
55a	Significant LAC investments in non-capital LAC liabilities of financial sector entities that are outside the scope of regulatory consolidation (net of eligible short positions)	–	
56	National specific regulatory adjustments applied to Tier 2 capital	–	
56a	Add back of cumulative fair value gains arising from the revaluation of land and buildings (own-use and investment properties) eligible for inclusion in Tier 2 capital	–	
56b	Regulatory deductions applied to Tier 2 capital to cover the required deductions falling within BCR § 48(1)(g)	–	
57	<b>Total regulatory adjustments to Tier 2 capital</b>	<b>–</b>	
58	<b>Tier 2 capital (T2)</b>	<b>4,172,233</b>	
59	<b>Total regulatory capital (TC = T1 + T2)</b>	<b>40,776,278</b>	
60	<b>Total RWA</b>	<b>134,102,176</b>	

# SHANGHAI COMMERCIAL BANK LIMITED

(All amounts in HK dollar thousands unless otherwise stated)

## 2 Capital structure and adequacy (Continued)

### Composition of regulatory capital (Continued)

	Component of regulatory capital reported by bank	Cross-referenced to balance sheet under regulatory scope of consolidation
<b>Capital ratios (as a percentage of RWA)</b>		
61	CET1 capital ratio	27.3%
62	Tier 1 capital ratio	27.3%
63	Total capital ratio	30.4%
64	Institution-specific buffer requirement (capital conservation buffer plus countercyclical capital buffer plus higher loss absorbency requirements)	2.8%
65	of which: capital conservation buffer requirement	2.5%
66	of which: bank specific countercyclical capital buffer requirement	0.34%
67	of which: higher loss absorbency requirement	–
68	CET1 (as a percentage of RWA) available after meeting minimum capital requirements	21.3%
<b>National minima (if different from Basel 3 minimum)</b>		
69	National CET1 minimum ratio	Not applicable
70	National Tier 1 minimum ratio	Not applicable
71	National Total capital minimum ratio	Not applicable
<b>Amounts below the thresholds for deduction (before risk weighting)</b>		
72	Insignificant LAC investments in CET1, AT1 and Tier 2 capital instruments issued by, and non-capital LAC liabilities of, financial sector entities that are outside the scope of regulatory consolidation	3,827,166
73	Significant LAC investments in CET1 capital instruments issued by financial sector entities that are outside the scope of regulatory consolidation	489,487
74	Mortgage servicing rights (net of associated deferred tax liabilities)	Not applicable
75	Deferred tax assets arising from temporary differences (net of associated deferred tax liabilities)	Not applicable
<b>Applicable caps on the inclusion of provisions in Tier 2 capital</b>		
76	Provisions eligible for inclusion in Tier 2 in respect of exposures subject to the BSC approach, or the STC approach and SEC-ERBA, SEC-SA and SEC-FBA (prior to application of cap)	1,752,758
77	Cap on inclusion of provisions in Tier 2 under the BSC approach, or the STC approach, and SEC-ERBA, SEC-SA and SEC-FBA	1,470,125
78	Provisions eligible for inclusion in Tier 2 in respect of exposures subject to the IRB approach and SEC-IRBA (prior to application of cap)	–
79	Cap for inclusion of provisions in Tier 2 under the IRB approach and SEC-IRBA	–

# SHANGHAI COMMERCIAL BANK LIMITED

(All amounts in HK dollar thousands unless otherwise stated)

## 2 Capital structure and adequacy (Continued)

### Composition of regulatory capital (Continued)

#### Note to the template:

Element where a more conservative definition has been applied in the BCR relative to that set out in Basel III capital standards:

Row No.	Description	Hong Kong basis	Basel III basis
	<b>Deferred tax assets ("DTA") (net of associated deferred tax liabilities)</b>	<b>1,055,858</b>	<b>-</b>
10	<p><u>Explanation</u></p> <p>As set out in paragraphs 69 and 87 of the Basel III text issued by the Basel Committee (December 2010), DTAs of the bank to be realized are to be deducted, whereas DTAs which relate to temporary differences may be given limited recognition in CET1 capital (and hence be excluded from deduction from CET1 capital up to the specified threshold). In Hong Kong, an AI is required to deduct all DTAs in full, irrespective of their origin, from CET1 capital. Therefore, the amount to be deducted as reported in row 10 may be greater than that required under Basel III. The amount reported under the column "Basel III basis" in this box represents the amount reported in row 10 (i.e. the amount reported under the "Hong Kong basis") adjusted by reducing the amount of DTAs to be deducted which relate to temporary differences to the extent not in excess of the 10% threshold set for DTAs arising from temporary differences and the aggregate 15% threshold set for mortgage servicing rights, DTAs arising from temporary differences and significant investments in CET1 capital instruments issued by financial sector entities (excluding those that are loans, facilities or other credit exposures to connected companies) under Basel III.</p>		
<p>Remarks:</p> <p>The amount of the 10% threshold and 5% threshold mentioned above is calculated based on the amount of CET1 capital determined in accordance with the deduction methods set out in BCR Schedule 4F. The 15% threshold is referring to paragraph 88 of the Basel III text issued by the Basel Committee (December 2010) and has no effect to the Hong Kong regime.</p>			

# SHANGHAI COMMERCIAL BANK LIMITED

(All amounts in HK dollar thousands unless otherwise stated)

## 2 Capital structure and adequacy (Continued)

### Main features of regulatory capital instruments

The main features of regulatory capital instruments as at 31 December 2025 are shown below. Full terms and conditions are published in the Bank's website of <http://www.shacombank.com.hk> and are accessible via the following direct link: <http://www.shacombank.com.hk/eng/about/regulatory/20251231.jsp>

		Ordinary shares	Subordinated notes due 2033
1	Issuer	Shanghai Commercial Bank Limited	Shanghai Commercial Bank Limited
2	Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)	N/A	ISIN: XS2531672892
3	Governing law(s) of the instrument	Laws of Hong Kong	English Law, except that the subordination provisions shall be governed by the laws of Hong Kong.
	Regulatory treatment		
4	Transitional Basel III rules	N/A	N/A
5	Basel III rules	Common Equity Tier 1	Tier 2
6	Eligible at solo*/group/solo and group	Solo and Group	Solo and Group
7	Instrument type (types to be specified by each jurisdiction)	Ordinary shares	Other Tier 2 instruments
8	Amount recognized in regulatory capital (currency in millions, as of most recent reporting date)	HK\$2,000 million	HK\$2,702 million
9	Par value of instrument	N/A	US\$350 million
10	Accounting classification	Shareholders' equity	Liability-amortized cost
11	Original date of issuance	1951, 1968, 1969, 1970, 1972, 1973, 1975, 1979, 1981, 1985, 1988, 1990, 1991, 1996, 2000	28 February 2023
12	Perpetual or dated	Perpetual	Dated
13	Original maturity date	No maturity	28 February 2033
14	Issuer call subject to prior supervisory approval	No	Yes
15	Optional call date, contingent call dates and redemption amount	N/A	One-off call date: 28 February 2028.  Additional optional redemption in whole at 100% of principal amount with accrued interest for taxation reasons, tax deductions reasons and regulatory reasons. Redemption amount subject to adjustment following occurrence of a Non-Viability Event. Redemption subject to prior written consent of the HKMA.
16	Subsequent call dates, if applicable	N/A	N/A
	Coupons/dividends		
17	Fixed or floating dividend/coupon	Floating	Fixed

# SHANGHAI COMMERCIAL BANK LIMITED

(All amounts in HK dollar thousands unless otherwise stated)

## 2 Capital structure and adequacy (Continued)

### Main features of regulatory capital instruments (Continued)

		Ordinary shares	Subordinated notes due 2033
18	Coupon rate and any related index	N/A	6.375% p.a.  Fixed until 28 February 2028 and thereafter reset to a new fixed rate equal to the sum of the then prevailing U.S. Treasury Rate and the Spread at Pricing.
19	Existence of a dividend stopper	No	No
20	Fully discretionary, partially discretionary or mandatory	Fully discretionary	Mandatory
21	Existence of step up or other incentive to redeem	No	No
22	Non-cumulative or cumulative	Non-cumulative	Cumulative
23	Convertible or non-convertible	Non-convertible	Non-convertible
24	If convertible, conversion trigger(s)	N/A	N/A
25	If convertible, fully or partially	N/A	N/A
26	If convertible, conversion rate	N/A	N/A
27	If convertible, mandatory or optional conversion	N/A	N/A
28	If convertible, specify instrument type convertible into	N/A	N/A
29	If convertible, specify issuer of instrument it converts into	N/A	N/A
30	Write-down feature	No	Yes
31	If write-down, write-down trigger(s)	N/A	The earlier of the HKMA notifying the issuer in writing:  (i) that the HKMA is of the opinion that a write-off or conversion is necessary, without which the Issuer would become non-viable or  (ii) that a decision has been made by the government body, a government officer or other relevant regulatory body with the authority to make such a decision, that a public sector injection of capital or equivalent support is necessary, without which the Issuer would become non-viable.
32	If write-down, full or partial	N/A	May be in part or in full

# SHANGHAI COMMERCIAL BANK LIMITED

(All amounts in HK dollar thousands unless otherwise stated)

## 2 Capital structure and adequacy (Continued)

### Main features of regulatory capital instruments (Continued)

		Ordinary shares	Subordinated notes due 2033
33	If write-down, permanent or temporary	N/A	Permanent
34	If temporary write-down, description of write-up mechanism	N/A	N/A
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument in the insolvency creditor hierarchy of the legal entity concerned).	N/A	<p>The rights of the holders will, in the event of the winding up of the Bank, rank</p> <p>(i) subordinate and junior in right of payment to, and of all claims of, (a) all unsubordinated creditors of the Issuer (including its depositors), and (b) all other Subordinated Creditors of the Issuer whose claims are stated to rank senior to the Notes or rank senior to the Notes by operation of law or contract;</p> <p>(ii) pari passu in right of payment to and of all claims of the holders of Parity Obligations; and</p> <p>(iii) senior in right of payment to, and of all claims of, (a) the holders of Junior Obligations, and (b) holders of Tier 1 Capital Instruments of the Issuer.</p>
36	Non-compliant transitioned features	N/A	N/A
37	If yes, specify non-compliant features	N/A	N/A

Footnote:

\* Include solo-consolidated

## 3 Overview of risk management and RWA

### (a) Overview of risk management

The Group's risk management framework is designed to cover all business processes and ensure various risks are properly managed and controlled in the course of conducting business. The key financial risks related to the Group's business include credit risk, counterparty credit risk, market risk, liquidity risk, interest rate risk and operational risk. Further information on the management of these risks is set out within the Regulatory Disclosures and Notes to the Consolidated Financial Statements as follows:

- |  |  |
|--|--|
| – Credit risk                            | – Note 7 of Regulatory Disclosures and Note 3.1 of Notes to the Consolidated Financial Statements    |
| – Counterparty credit risk               | – Note 8 of Regulatory Disclosures   |
| – Market risk                            | – Note 10 of Regulatory Disclosures and Note 3.2 of Notes to the Consolidated Financial Statements   |
| – Operational risk                       | – Note 11 of Regulatory Disclosures and Note 3.6 of Notes to the Consolidated Financial Statements   |
| – Liquidity risk                         | – Note 12 of Regulatory Disclosures and Note 3.3 of Notes to the Consolidated Financial Statements   |
| – Interest rate risk in the banking book | – Note 13 of Regulatory Disclosures and Note 3.2.5 of Notes to the Consolidated Financial Statements |

### Risk culture

The Group has long recognized the importance of a strong risk culture which is the core value of the Group and is endorsed by the Board of Directors ("the Board") and being followed by the senior management. A Bank Culture Task Force has been established to recommend and implement necessary enhancement initiatives on bank culture, promoting the Group's corporate values and fostering a positive bank culture. The risk culture of the Group is created through setting and complying with the risk management strategies and core risk management principles as well as establishing a sound risk management systems and effective risk management process to address material risks under normal and stressed conditions in a forward-looking approach. Risk awareness is promoted to all staff to enhance the Group's overall risk management through appropriate training. The Group's risk culture is further reinforced by the Group's remuneration system that is established to ensure that incentives would not create excessive or undue risk exposure and unethical behaviour which could threaten the reputation as well as safety and soundness of the Group.

### Risk governance

The Board has the ultimate responsibility for the effective management of risk and approves and oversees the Group's overall risk management framework. The Board delegates its power to oversee the Group's major functional areas, including treasury, retail banking, corporate banking, risk management, wealth management, credit control and financial control, and the risks associated with them to the Risk Committee, the Audit Committee, the Executive Committee, and the Sustainability Committee. The Risk Committee in particular has the authority and responsibility to oversee and guide the overall management of the bank-wide risks undertaken by the Group.

The Chief Executive, Chief Risk Officer and the senior management have the responsibility to ensure various risk limits are appropriately established according to the risk management strategies set by the Board, and to oversee the effectiveness of managing and controlling risk in the day-to-day management of the Group.

Various business and functional units of the Group have their respective risk management responsibilities. Business units act as the first line of defence in risk management while other functional units, in particular Risk Management Division and Credit Division, which are independent from the business units and act as the second line of defence, assist in managing different kinds of risks.

The Internal Audit Department as the third line of defence, is responsible for providing independent assurance through conducting internal audits, and reporting to the Audit Committee on the quality of risk controls and management, and the adequacy and effectiveness of internal control environment of the Group.

## 3 Overview of risk management and RWA (Continued)

### (a) Overview of risk management (Continued)

#### Risk appetite

The Group's Risk Appetite Statement is reviewed and approved by the Board from time to time but at least annually with reference to evolving industry and market development, which describes the level of risk that the Group is prepared to accept in pursuit of the Group's strategic objectives. The Group adopts a low risk appetite in managing and controlling risks in a prudent manner with a view to achieving steady growth and reasonable returns.

Various ratios and risk limits are set with reference to the legal and regulatory requirements to limit and control the risk exposure of the Group under a risk tolerance level acceptable to the Group and commensurate with the risk adverse culture as well as prudent management practice.

#### Stress testing

Stress testing is a risk management tool and involves the use of various techniques to assess the Group's potential vulnerability to adverse changes in market conditions. It is conducted with hypothetical as well as historical assumptions. With the establishment of various alerting levels under different scenarios, it helps to alert the management to adverse unexpected outcomes related to a variety of risks and provides an indication to the amount of financial resources (including capital and liquidity) that might be necessary for absorbing losses caused by, or to withstand, severe stressed conditions.

#### Risk measurement and information reporting

The Group has developed various systems for risk measurement and reporting for different risk exposures. Further information on the measurement and reporting of credit risk, market risk, operational risk, liquidity risk and interest rate risk in the banking book exposures are provided in Note 7(a), Note 10(a), Note 11(a), Note 12 and Note 13 of Regulatory Disclosures respectively.

A detailed report on risk exposures and risk management activities of the Group, which covers the assessment on major risk exposures including credit risk, market risk, interest rate risk in the banking book, liquidity risk, legal risk, compliance and regulatory risk, operational risk, reputation risk, strategic risk, technology risk and climate risk is presented to the Risk Committee for review on a quarterly basis. Besides, the results of stress tests, maintenance of regulatory risk limits and risk monitoring on branches outside Hong Kong are also presented.

The Group continues to invest significant resources in IT systems and processes in order to maintain and improve the risk management capabilities. A number of key initiatives and projects to enhance consistent data aggregation, reporting and management, and work towards meeting new regulatory standards are in progress.

#### Risk mitigation

The Group applies different strategies and processes to hedge and mitigate different risks. Exposure to credit risk is usually mitigated by obtaining collateral and corporate and personal guarantees. The Group further mitigates credit risk by entering into netting arrangements with financial institutions to cover derivatives instruments while obtaining margin deposits from non-financial counterparties. For liquidity risk management, in addition to establishing a liquidity cushion, the Group utilizes results from stress-testing and reverse stress-testing to enhance resilience to liquidity stress and serve as early-warning triggers for the formulation of management actions and contingency funding plan to mitigate potential stress and vulnerability which the Group might face.

The Group employs operational risk transfer mechanisms, specifically insurance, to mitigate the risk of low-frequency-high-impact potential events. The insurance policies of the Group (which include crime insurance, professional indemnity insurance and directors, officer's liability insurance, etc.) are subject to annual review, or whenever necessary, by the General Insurance Department and the Operational Risk Management Department ("ORMD"), with final approval by the Compliance and Operational Risk Management Committee ("CORMC").

Risks related to outsourcing are managed by the units that outsource a function, process or a service. The Compliance Department has established Guidelines on Outsourcing and Insourcing to assist the Group in complying with the applicable regulatory requirements. The ORMD coordinates with the relevant outsourcing owners to ensure annual assessment of all outsourcing activities are being performed.

# SHANGHAI COMMERCIAL BANK LIMITED

(All amounts in HK dollar thousands unless otherwise stated)

## 3 Overview of risk management and RWA (Continued)

### (b) Overview of RWA

The table below shows the breakdowns of RWA for various risks as at 31 December 2025 and 30 September 2025 and the minimum capital requirements as at 31 December 2025 which are calculated by multiplying the Group's RWA by 8%.

		RWA		Minimum capital requirements
		31 December 2025	30 September 2025	31 December 2025
1	Credit risk for non-securitization exposures	106,187,316	107,812,361	8,494,985
2	Of which STC approach	106,187,316	107,812,361	8,494,985
2a	Of which BSC approach	-	-	-
3	Of which foundation IRB approach	-	-	-
4	Of which supervisory slotting criteria approach	-	-	-
5	Of which advanced IRB approach	-	-	-
5a	Of which retail IRB approach	-	-	-
5b	Of which specific risk-weight approach	-	-	-
6	Counterparty credit risk and default fund contributions	613,013	650,828	49,041
7	Of which SA-CCR approach	613,013	650,828	49,041
7a	Of which CEM	-	-	-
8	Of which IMM(CCR) approach	-	-	-
9	Of which others	-	-	-
10	Credit valuation adjustment ("CVA") risk	363,263	405,488	29,061
11	Equity positions in banking book under the simple risk-weight method and internal models method	N/A	N/A	N/A
12	Collective investment scheme ("CIS") exposures – look-through approach/third-party approach	-	-	-
13	CIS exposures – mandate-based approach	-	-	-
14	CIS exposures – fall-back approach	-	-	-
14a	CIS exposures – combination of approaches	-	-	-
15	Settlement risk	-	-	-
16	Securitization exposures in banking book	-	-	-
17	Of which SEC-IRBA	-	-	-
18	Of which SEC-ERBA (including IAA)	-	-	-
19	Of which SEC-SA	-	-	-
19a	Of which SEC-FBA	-	-	-
20	Market risk	7,217,475	6,547,625	577,398
21	Of which STM approach	7,217,475	6,547,625	577,398
22	Of which IMA	-	-	-
22a	Of which SSTM approach	-	-	-
23	Capital charge for moving exposures between trading book and banking book	-	-	-
24	Operational risk	8,911,463	8,591,738	712,917
24a	Sovereign concentration risk	-	-	-
25	Amounts below the thresholds for deduction (subject to 250% RW)	10,809,646	11,509,541	864,772
26	Output floor level applied	N/A	N/A	N/A
27	Floor adjustment (before application of transitional cap)	N/A	N/A	N/A
28	Floor adjustment (after application of transitional cap)	N/A	N/A	N/A
28a	Deduction to RWA	-	-	-
28b	Of which portion of regulatory reserve for general banking risks and collective provisions which is not included in Tier 2 Capital	-	-	-
28c	Of which portion of cumulative fair value gains arising from the revaluation of land and buildings which is not included in Tier 2 Capital	-	-	-
29	<b>Total</b>	<b>134,102,176</b>	<b>135,517,581</b>	<b>10,728,174</b>

# SHANGHAI COMMERCIAL BANK LIMITED

(All amounts in HK dollar thousands unless otherwise stated)

## 4 Linkages between financial statements and regulatory exposures

### (a) Differences between accounting and regulatory scopes of consolidation and mapping of financial statement categories with regulatory risk categories

	Carrying values as reported in published financial statements	Carrying values under scope of regulatory consolidation	Carrying values of items:				
			subject to credit risk framework	subject to counterparty credit risk framework	subject to the securitization framework	subject to market risk framework	not subject to capital requirements or subject to deduction from capital
<b>Assets</b>							
Cash and balances with banks	37,645,746	37,644,023	37,644,023	-	-	-	-
Placements with and advances to banks	41,142,419	41,142,419	41,142,419	-	-	-	-
Loans and advances to customers	67,275,776	67,275,776	67,275,776	-	-	-	-
Financial assets at fair value through profit or loss	155,272	121,026	12,206	-	-	103,501	5,319
Derivative financial instruments	499,949	499,949	-	499,949	-	499,949	-
Investment securities at fair value through other comprehensive income	68,326,253	68,067,222	66,404,930	-	-	-	1,662,292
Investment securities at amortized cost	4,739,101	4,739,101	4,739,101	-	-	-	-
Properties for sale	336,511	336,511	336,511	-	-	-	-
Investments in associates and joint venture	365,679	43,000	43,000	-	-	-	-
Investments in and amounts due from subsidiaries	-	302,777	302,777	-	-	-	-
Properties and equipment	2,203,270	2,203,270	2,203,270	-	-	-	-
Investment properties	982,161	982,161	982,161	-	-	-	-
Intangible assets	72,648	101,110	-	-	-	-	101,110
Current income tax assets	243,544	243,544	243,544	-	-	-	-
Deferred income tax assets	1,050,441	1,055,858	-	-	-	-	1,055,858
Other assets	2,464,950	2,332,081	2,332,081	-	-	-	-
<b>Total assets</b>	<b>227,503,720</b>	<b>227,089,828</b>	<b>223,661,799</b>	<b>499,949</b>	<b>-</b>	<b>603,450</b>	<b>2,824,579</b>
<b>Liabilities</b>							
Deposits and balances from banks	4,866,038	4,866,038	-	-	-	-	4,866,038
Deposits from customers	175,133,015	175,133,015	-	-	-	-	175,133,015
Derivative financial instruments	500,469	500,469	-	500,469	-	500,469	-
Amounts due to subsidiaries	-	468,290	-	-	-	-	468,290
Subordinated debts	2,702,108	2,702,108	-	-	-	-	2,702,108
Other liabilities	3,127,750	2,921,760	-	-	-	-	2,921,760
Current income tax liabilities	127,201	120,223	-	-	-	-	120,223
Deferred income tax liabilities	11,195	11,150	-	-	-	-	11,150
<b>Total liabilities</b>	<b>186,467,776</b>	<b>186,723,053</b>	<b>-</b>	<b>500,469</b>	<b>-</b>	<b>500,469</b>	<b>186,222,584</b>

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(All amounts in HK dollar thousands unless otherwise stated)

## 4 Linkages between financial statements and regulatory exposures (Continued)

### (b) Main sources of differences between regulatory exposure amounts and carrying values in financial statements

	Total	Items subject to:			
		credit risk framework	securitization framework	counterparty credit risk framework	market risk framework
Asset carrying value amount under scope of regulatory consolidation (as per Regulatory Disclosures Note 4(a))	224,265,249	223,661,799	-	499,949	603,450
Liabilities carrying value amount under regulatory scope of consolidation (as per Regulatory Disclosures Note 4(a))	500,469	-	-	500,469	500,469
Total net amount under regulatory scope of consolidation	223,764,780	223,661,799	-	(520)	102,981
Off-balance sheet amounts	31,760,981	6,518,979	-	-	-
Differences due to consideration of provisions	751,184	751,184	-	-	-
Difference due to potential exposures for counterparty risk	958,724	-	-	958,724	-
Difference due to replacement cost for counterparty risk	198,941	-	-	198,941	-
Other differences	8,952	8,952	-	-	-
Exposure amounts considered for regulatory purposes	257,443,562	230,940,914	-	1,157,145	102,981

### (c) Explanations of differences between accounting and regulatory exposure amount

#### Basis of consolidation

The basis of consolidation for regulatory purposes is different from that for accounting purposes. Subsidiaries included in the consolidation for regulatory purposes are specified by the Hong Kong Monetary Authority. Subsidiaries not included in consolidation for regulatory purposes are mainly securities and insurance companies that are authorized and supervised by the Securities and Futures Commission and Insurance Authority respectively.

Most of the principal subsidiaries of the Group are included under scope of regulatory consolidation that there are no material differences between the carrying values of assets as reported in published financial statements and under scope of regulatory consolidation.

The insurance subsidiary of the Bank is not included in the consolidated scope for the calculation of regulatory capital positions. The aggregate amount of investments in the insurance subsidiary, together with other capital investments in subsidiaries, associates and joint venture of the Bank that exceed 10 % of the Bank's CET1 capital, is deducted from the Bank's CET1 capital. Any surplus capital in the insurance subsidiary is not recognized when calculating the Bank's capital adequacy.

Exposure amounts considered for regulatory purposes require adjustments to be made to the carrying value of assets as reported in published financial statements. The main adjustments taken by the Group include the consideration of provisions, off-balance sheet exposures and potential exposure of default risk.

## 4 Linkages between financial statements and regulatory exposures (Continued)

### (c) Explanations of differences between accounting and regulatory exposure amount (Continued)

#### Basis of consolidation (Continued)

The Group uses the standardized (credit risk) approach, standardized (market risk) approach, revised standardized approach and reduced basic CVA approach under BCR to calculate regulatory capital or capital charge for credit risk, market risk, operational risk and CVA risk respectively. During the reporting period, the Group did not have any securitization exposure. Stage 1 and Stage 2 credit impairment allowances that are deducted from the carrying amount of exposures in the financial statements need to be reintegrated in the regulatory exposure value under the standardized approach. Off-balance sheet contracts, such as guarantees and commitments, also carry credit risks. These exposures are converted to credit equivalent amounts and added to the regulatory exposure amounts. The default risk exposures of OTC derivative contracts as reported in the published financial statements include their fair value only. Potential exposures for counterparty credit risk of OTC derivative contracts are therefore needed to be added to the regulatory exposure amount.

The Group operates subsidiaries in different countries where capital is governed by local rules and there may be restrictions on the transfer of funds or regulatory capital between members of the Group.

#### Valuation control framework

The Group has in place fair valuation policy to ensure adequate governance and control processes for the designation and valuation of financial instruments to be measured at fair value for financial reporting, risk management and regulatory capital purposes.

The Risk Committee is delegated by the Board to approve the fair valuation policy and to review the governance structure and control framework to ensure that fair values are either determined or validated by control units independent of risk taking units. Control units have the overall responsibility for determination of valuation or independent verification of valuation results and ensuring the valuation process for financial instruments is conducted effectively and appropriately. Revaluation reports of trading and non-trading positions are compiled regularly and submitted to senior management for review. Any significant valuation issues are reported to senior management, the Asset and Liability Committee and the Risk Committee.

#### Valuation methodologies and process

Fair value is defined as the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction in the principal (or most advantageous) market at the measurement date under current market conditions (i.e. an exit price) regardless whether the price is directly observable or estimated using another valuation technique.

For financial instrument with bid-offer close-out price, its fair value can be the price within the bid-offer price that is the most representative of fair value. All bid-offer market prices of the financial products, including foreign exchange, equities, debt securities and interest rate swap will be obtained from designated financial data service providers.

For financial instrument without bid-offer close-out price, the Group uses valuation techniques to establish the fair value of instruments including the use of recent arm's length market transactions between knowledgeable and willing parties, reference to the current fair value of another financial instrument that is substantially the same, discounted cash flow analysis, option pricing models and other valuation techniques commonly used by market participants.

# SHANGHAI COMMERCIAL BANK LIMITED

(All amounts in HK dollar thousands unless otherwise stated)

## 4 Linkages between financial statements and regulatory exposures (Continued)

### (c) Explanations of differences between accounting and regulatory exposure amount (Continued)

#### Valuation adjustments

Valuation adjustments are an integral part of the valuation process. Appropriate valuation adjustments are made when the Group considers that there are additional factors that are not incorporated within the valuation methodologies or models such as illiquidity adjustment and valuation uncertainty adjustment.

Illiquidity adjustment may be taken if the securities are deemed illiquid, such as where the Group holds a security that has a significant concentration ratio (ratio of amount of security held by the Group to the total issuance size). To adopt illiquidity adjustment, securities with the same issuer and having nearby maturities as the security in subject would be selected and the yields of these securities would be extracted and interpolated as the yield of security in subject and the price of the illiquid security would then be calculated and compared with the price calculated by the usual valuation methodologies and processes.

The prices of certain debt securities may be less readily determinable from market data. If there is no quotation from designated financial data service providers, other sources will be sought such as the prices of most recent executed transactions. Standard deviation of the prices of the debt securities quoted by different rate sources will be calculated as the uncertainty of the prices quoted of the securities. The fair value of the debt securities will be adjusted by the standard deviation of the prices of the corresponding securities.

#### (d) Prudent valuation adjustments

As at 31 December 2025, bid-offer spread valuation adjustment was made on certain assets and instruments to take into account the cost that would be incurred when closing out the positions. Other valuation adjustments are not required as most of the Group's investments were debt securities of straight bonds that did not contain any complex features.

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
	Equity	Interest rates	FX	Credit	Commodities	Total	Of which: In the trading book	Of which: In the banking book
1 Close-out uncertainty, of which:	-	-	2,956	-	-	2,956	2,956	-
2 Mid-market value	-	-	-	-	-	-	-	-
3 Close-out costs	-	-	2,956	-	-	2,956	2,956	-
4 Concentration	-	-	-	-	-	-	-	-
5 Early termination	-	-	-	-	-	-	-	-
6 Model risk	-	-	-	-	-	-	-	-
7 Operational risks	-	-	-	-	-	-	-	-
8 Investing and funding costs						-	-	-
9 Unearned credit spreads						-	-	-
10 Future administrative costs	-	-	-	-	-	-	-	-
11 Other adjustments	-	-	-	-	-	-	-	-
12 Total adjustments	-	-	2,956	-	-	2,956	2,956	-

# SHANGHAI COMMERCIAL BANK LIMITED

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## 5 Countercyclical capital buffer (“CCyB”) ratio

CCyB ratio is calculated as the weighted average of the applicable jurisdictional CCyB (“JCCyB”) ratio effective at the date for which the determination is made, in respect of the jurisdictions (including Hong Kong) where the Bank has private sector credit exposures. The weight to be attributed to a given jurisdiction’s applicable CCyB ratio is the ratio of the Bank’s aggregate RWA for its private sector credit exposures (in both the banking book and the trading book) in that jurisdiction where the location of the exposures is determined as far as possible on an ultimate risk basis to the sum of the Bank’s aggregate RWA across all jurisdictions in which the Bank has private sector credit exposures.

Key drivers for the changes in exposure amounts include asset quality, credit growth and credit portfolio. The applicable JCCyB ratio for Hong Kong is determined by the Hong Kong Monetary Authority based on the Initial Reference Calculator that is transparently calculated and made public, while the applicable JCCyB ratio in respect of a given jurisdiction outside Hong Kong may differ from the JCCyB ratio as determined by the relevant authority in that jurisdiction if the Hong Kong Monetary Authority has determined and announced the application of a higher or lower rate.

The following table shows the CCyB ratio, the geographical breakdown of the RWA in relation to private sector credit exposures that are relevant to the calculation of CCyB ratio and which have an applicable JCCyB ratio greater than zero as at 31 December 2025.

Geographical breakdown by Jurisdiction (J)		Applicable JCCyB ratio in effect (%)	RWA used in computation of CCyB ratio	AI-specific CCyB ratio (%)	CCyB amount
		%	HK\$'000	%	HK\$'000
1	Hong Kong SAR	0.50%	50,038,417		
2	Australia	1.00%	910,534		
3	Belgium	1.00%	4,571		
4	Chile	0.50%	55		
5	France	1.00%	89		
6	Germany	0.75%	66		
7	Ireland	1.50%	93,585		
8	Netherlands	2.00%	11,268		
9	Norway	2.50%	2		
10	South Korea	1.00%	62,392		
11	Spain	0.50%	8		
12	Sweden	2.00%	2		
13	United Kingdom	2.00%	350,436		
	<b>Sum</b>		<b>51,471,425</b>		
	<b>Total</b>		<b>79,917,728</b>	<b>0.34%</b>	<b>455,947</b>

# SHANGHAI COMMERCIAL BANK LIMITED

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## 6 Leverage ratio

The leverage ratio ("LR") represents the consolidated ratio computed in the same regulatory consolidation basis as the capital adequacy ratio. The table below presents the summary comparison of accounting assets against leverage ratio exposure measure as at 31 December 2025.

Item	Value under the LR framework
1 Total consolidated assets as per published financial statements (before adjustments for specific and collective provisions)	229,271,051
2 Adjustment for investments in banking, financial, insurance or commercial entities that are consolidated for accounting purposes but outside the scope of regulatory consolidation	(413,892)
3 Adjustment for securitized exposures that meet the operational requirements for the recognition of risk transference	–
4 Adjustments for temporary exemption of central bank reserves	Not applicable
5 Adjustment for fiduciary assets recognized on the balance sheet pursuant to the applicable accounting standard but excluded from the LR exposure measure	–
6 Adjustments for regular-way purchases and sales of financial assets subject to trade date accounting	–
7 Adjustments for eligible cash pooling transactions	–
8 Adjustments for derivative contracts	605,247
9 Adjustment for SFTs (i.e. repos and similar secured lending)	–
10 Adjustment for off-balance sheet ("OBS") items (i.e. conversion to credit equivalent amounts of OBS exposures)	6,518,979
11 Adjustments for prudent valuation adjustments and specific and collective provisions that are allowed to be excluded from LR exposure measure	(1,767,331)
12 Other adjustments	(3,762,730)
13 <b>Leverage ratio exposure measure</b>	<b>230,451,324</b>

The leverage ratios as at 31 December 2025 and 30 September 2025 are shown below:

	31 December 2025	30 September 2025
<b>On-balance sheet exposures</b>		
1 On-balance sheet exposures (excluding derivative contracts and SFTs, but including related on-balance sheet collateral)	228,357,210	229,004,922
2 Gross-up for derivative contracts collateral provided where deducted from balance sheet assets pursuant to the applicable accounting standard	–	–
3 Less: Deductions of receivables assets for cash variation margin provided under derivative contracts	–	–
4 Less: Adjustment for securities received under SFTs that are recognized as an asset	–	–
5 Less: Specific and collective provisions associated with on-balance sheet exposures that are deducted from Tier 1 capital	(1,700,951)	(1,459,940)
6 Less: Asset amounts deducted in determining Tier 1 capital	(3,762,730)	(3,243,615)
7 <b>Total on-balance sheet exposures (excluding derivative contracts and SFTs)</b>	<b>222,893,529</b>	<b>224,301,367</b>

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(All amounts in HK dollar thousands unless otherwise stated)

## 6 Leverage ratio (Continued)

		31 December 2025	30 September 2025
<b>Exposures arising from derivative contracts</b>			
8	Replacement cost associated with all derivative contracts (where applicable net of eligible cash variation margin and/or with bilateral netting)	118,740	93,767
9	Add-on amounts for PFE associated with all derivative contracts	986,456	1,182,803
10	Less: Exempted CCP leg of client-cleared trade exposures	–	–
11	Adjusted effective notional amount of written credit-related derivative contracts	–	–
12	Less: Permitted reductions in effective notional amount and permitted deductions from add-on amounts for PFE of written credit-related derivative contracts	–	–
13	<b>Total exposures arising from derivative contracts</b>	1,105,196	1,276,570
<b>Exposures arising from SFTs</b>			
14	Gross amount of SFT assets (with no recognition of netting), after adjusting for sale accounting transactions	–	800,000
15	Less: Netted amounts of cash payables and cash receivables of gross SFT assets	–	–
16	CCR exposure for SFT assets	–	3,397
17	Agent transaction exposures	–	–
18	<b>Total exposures arising from SFTs</b>	–	803,397
<b>Other off-balance sheet exposures</b>			
19	Off-balance sheet exposure at gross notional amount	31,760,981	35,353,612
20	Less: Adjustments for conversion to credit equivalent amounts	(25,242,002)	(28,326,244)
21	Less: Specific and collective provisions associated with off-balance sheet exposures that are deducted from Tier 1 capital	(66,380)	(42,856)
22	<b>Off-balance sheet items</b>	6,452,599	6,984,512
<b>Capital and total exposures</b>			
23	<b>Tier 1 capital</b>	36,604,045	36,120,469
24	<b>Total exposures</b>	230,451,324	233,365,846
<b>Leverage ratio</b>			
25 & 25a	<b>Leverage ratio</b>	15.9%	15.5%
26	<b>Minimum leverage ratio requirement</b>	3.0%	3.0%
27	<b>Applicable leverage buffers</b>	Not applicable	Not applicable
<b>Disclosure of mean values</b>			
28	Mean value of gross assets of SFTs, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables	155,435	8,696
29	Quarter-end value of gross amount of SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables	–	800,000
30 & 30a	Total exposures based on mean values from row 28 of gross assets of SFTs (after adjustment for sale accounting transactions and netted amounts of associated cash payables and cash receivables)	230,606,759	232,574,542
31 & 31a	Leverage ratio based on mean values from row 28 of gross assets of SFTs (after adjustment for sale accounting transactions and netted amounts of associated cash payables and cash receivables)	15.9%	15.5%

Abbreviations:

CCP	Central counterparty
CCR	Counterparty credit risk
PFE	Potential future exposure
SFT	Securities financing transactions

## 7 Credit risk

### (a) General information about credit risk

The Group takes on exposure to credit risk, which is the risk that a counterparty will cause a financial loss for the Group by failing to discharge an obligation. The Group's exposure to credit risk arises from a range of customer and product types, including exposures to corporate, retail and high net worth customers. The major corporate banking products offered by the Group include commercial loans and trade finance. The retail loans cover mortgage loans, consumer loans and credit cards.

The approach used for defining credit risk management policy and setting credit risk limits is described in Note 3.1 of Notes to the Consolidated Financial Statements.

Various analytical reports on credit risk exposures and credit risk management are provided monthly to senior management; including reports on loans and advances to customers, the credit risk profile of the Group, the portfolio distribution and credit quality, credit portfolio risk monitoring and compliance, impairment allowance and large exposures and risk concentrations.

### Credit risk management framework

The Group's organization structure establishes a clear set of authority and responsibility for monitoring compliance with policies, procedures and limits.

The Credit Committee is responsible for establishing credit policies, monitoring loan portfolio quality and impairment charge, ensuring compliance with statutory and internal lending limits, evaluating credit applications, making credit decisions and etc. Further information on the Credit Committee is set out in the Corporate Governance Report included in the 2025 Annual Report.

The Chief Risk Officer takes charge of the Group's overall credit risk management. He is responsible for ensuring that the Group's risk management framework, all related policies and control procedures, and business processes are effective, adequate and properly implemented and consistent with the overall risk appetite of the Group and credit related regulatory requirements. He is also responsible for assessing, evaluating and monitoring the use of risk limits and ensuring that quantifiable risks are within the approved limits.

Various units of the Group have their respective credit risk management responsibilities. Business units including branches and business departments, being the first line of defence, are responsible for performing on-going 'know your customer' checks. The Corporate Credit Administration Department, being the first line of defence to support business units, is responsible for reviewing and ensuring quality of credit applications. The Credit Appraisal Department, Credit Control Department, Special Asset Management Department, Credit Policy & Project Management Department, Market Risk & Risk Analytics Department and the Compliance Department, which are independent from the business units, act as the second line of defence. The Credit Appraisal Department is responsible for independent evaluation of credit applications and periodic credit reviews, Credit Policy & Project Management Department is responsible for formulating and reviewing credit risk policies and guidelines, Credit Control Department is responsible for performing credit control and routine monitoring, also conducting portfolio review, while Special Asset Management Department is responsible for managing classified credit portfolio, including loan collection and recovery. The Market Risk & Risk Analytics Department is responsible for monitoring the day-to-day management of the credit risk related to treasury operation. The Compliance Department is responsible for monitoring and ensuring that all the relevant regulatory and statutory requirements and limits are complied with by the Group. The Internal Audit Department is responsible for conducting regular review on the adequacy and effectiveness of the credit risk control and governance processes of the Group, and compliance with regulatory and statutory requirements.

# SHANGHAI COMMERCIAL BANK LIMITED

(All amounts in HK dollar thousands unless otherwise stated)

## 7 Credit risk (Continued)

### (b) Credit quality of exposures as at 31 December 2025

Gross carrying amounts of			Allowances/ impairments	Of which ECL accounting provisions for credit losses on STC approach exposures		Of which ECL accounting provisions for credit losses on IRB approach exposures	Net values	
	Defaulted exposures	Non- defaulted exposures		Allocated in regulatory category of specific provisions	Allocated in regulatory category of collective provisions			
1	Loans	3,956,367	64,835,110	1,515,701	803,832	711,869	-	67,275,776
2	Debt securities	-	67,214,724	35	-	35	-	67,214,689
3	Off-balance sheet exposures	9,973	8,172,926	27,804	-	27,804	-	8,155,095
4	<b>Total</b>	<b>3,966,340</b>	<b>140,222,760</b>	<b>1,543,540</b>	<b>803,832</b>	<b>739,708</b>	<b>-</b>	<b>142,645,560</b>

### (c) Changes in defaulted loans and debt securities

	Amount	
1	Defaulted loans and debt securities as at end of the previous reporting period	4,552,062
2	Loans and debt securities that have defaulted since the last reporting period	1,510,096
3	Returned to non-defaulted status	(321,767)
4	Amounts written off	(1,348,946)
5	Other changes*	(435,078)
6	<b>Defaulted loans and debt securities as at end of the current reporting period</b>	<b>3,956,367</b>

\* Other changes include loan repayment and exchange rate difference.

### (d) Additional disclosures related to credit quality of exposures

The accounting definition of impaired exposures and the regulatory definition of defaulted exposures are generally aligned. In general, loans and advances overdue for more than 90 days or the borrower meets unlikelihood-to-pay criteria are considered impaired unless other information is available to indicate the contrary. Loans and advances with a specific repayment date are classified as overdue when the principal or interest is past due and remains unpaid. Loans and advances repayable by regular instalments are classified as overdue when an instalment payment is past due and remains unpaid. Loans and advances repayable on demand are classified as overdue when a demand for repayment has been served on the borrower but repayment has not been made in accordance with the instruction.

The approach for determining impairment of financial assets is provided in Notes 2.6 and 3.1.1 of Notes to the Consolidated Financial Statements.

As at 31 December 2025, loans and advances which were past due for more than 90 days were all impaired.

Rescheduled loans and advances to customers are those loans and advances that have been rescheduled or renegotiated for reasons related to the borrower's financial difficulties. A rescheduled loan will normally require an adverse classification under the loan classification system (i.e. substandard or doubtful).

# SHANGHAI COMMERCIAL BANK LIMITED

(All amounts in HK dollar thousands unless otherwise stated)

## 7 Credit risk (Continued)

### (d) Additional disclosures related to credit quality of exposures (Continued)

#### (i) Breakdown of credit risk exposures as at 31 December 2025 by industry sector, geographical region and residual maturity

	Total	Impaired exposure	Stage 3 impairment allowances	Amounts written-off
<b>Credit risk exposure – By industry sector</b>				
– Property development	9,995,969	1,327,904	221,358	1,225,728
– Property investment	15,511,597	1,599,343	341,855	123,239
– Banks and financial institutions	47,947,256	4,110	–	–
– International, wholesale and retail trade	9,712,019	609,161	169,458	553,921
– Personal	12,458,953	127,815	1,277	3,134
– Others*	47,019,766	289,429	69,884	393,344
<b>Total</b>	<b>142,645,560</b>	<b>3,957,762</b>	<b>803,832</b>	<b>2,299,366</b>
<b>Credit risk exposure – By geographical region</b>				
– Hong Kong	62,172,073	1,291,196	185,220	874,801
– Chinese Mainland	7,844,367	102,891	104,237	715,039
– United States	22,820,106	2,563,632	514,347	709,526
– Others	49,809,014	43	28	–
<b>Total</b>	<b>142,645,560</b>	<b>3,957,762</b>	<b>803,832</b>	<b>2,299,366</b>
<b>Credit risk exposure – By residual maturity</b>				
– Repayable on demand	4,776,452			
– Up to 1 month	11,163,892			
– 1–3 months	13,723,906			
– 3–12 months	29,210,876			
– 1–5 years	63,513,297			
– Over 5 years	17,124,510			
– Indefinite	3,132,627			
<b>Total</b>	<b>142,645,560</b>			

\* Others include exposures to manufacturing, hotels, catering, telecommunication, transport and other commercial and industrial activities where exposure to each of these sectors is less than 10% of the Group's total RWA for credit risk.

#### (ii) Aging analysis of accounting past due exposures as at 31 December 2025

	Gross carrying amount
Past due over 3 months but less than 6 months	195,004
Past due over 6 month but less than 1 year	1,111,379
Past due over 1 year	1,989,146
<b>Total</b>	<b>3,295,529</b>

#### (iii) Breakdown of restructured exposures between impaired and non-impaired exposures as at 31 December 2025

	Gross carrying amount of	
	Impaired	Not impaired
Rescheduled loans and advances	1,574	–

## 7 Credit risk (Continued)

### (e) Qualitative disclosures related to credit risk mitigation

#### Collateral

The Group employs a range of policies and practices to mitigate credit risk which is described in Note 3.1.4(a) of Notes to the Consolidated Financial Statements.

#### Revaluation and management of collateral

To ascertain the estimated fair value of the collateral offered to the Group, collateral other than the bank deposits is revalued according to the Guideline on Management of Collateral and Guarantees for monitoring the collateral position against relevant credit exposure.

The revaluation frequency depends on the collateral type but at least annually such as real estate, debt securities and equities. More frequent revaluation is needed for certain products, such as listed stocks which are revalued at least twice daily. The collateral value may be adjusted to reflect the likely net realizable value of such collateral.

Advice and service will be sought and employed from external legal professional whenever required to ensure all documentation creating the collateral and providing for the obligation of the parties with respect to each other in respect of the collateral is binding on all parties and legally enforceable in all relevant jurisdictions.

#### Recognition of risk mitigation under the standardized approach

The Group applies the simple approach for credit risk mitigation to all its on- and off-balance sheet banking book exposures that are subject to risk mitigation. Where a claim on a counterparty is secured against eligible collateral, the secured portion of the claim must be weighted according to the risk-weight applicable to the collateral (unless that produces a higher risk-weight than would be applicable to the original counterparty, in which case the risk-weight applicable to that counterparty should apply). The unsecured portion of the claim must be weighted according to the risk-weight applicable to the original counterparty. The main types of recognized credit risk mitigant used by the Group include deposits and bank guarantee.

Where a claim on a counterparty is secured by a guarantee from an eligible guarantor, the portion of the claim that is supported by the guarantee is to be weighted according to the risk-weight applicable to the guarantor (unless the risk-weight applicable to the original counterparty is lower). The unsecured portion of the claim must be weighted according to the risk-weight applicable to the original counterparty.

For capital calculation, the Group has not used any on-balance sheet or off-balance sheet recognized netting for credit risk mitigation.

#### Concentrations within credit risk mitigations

Concentrations within credit risk mitigations taken may occur if a number of guarantors and collaterals with similar economic characteristics are engaged in comparable activities with changes in economic or industry conditions affecting their ability to meet contractual obligations. A range of quantitative tools is used to monitor the Group's credit risk mitigating activities including dedicated stress tests.

Stress-tests and scenario analysis are conducted on the Group's portfolio of collateral to assess the impact under unusual market conditions and relevant reports are submitted to the senior management for review in accordance with the Stress-Testing Policy of the Group.

The credit concentrations within the credit risk mitigation (recognized collateral and guarantees for capital calculation) used by the Group are within acceptable levels.

# SHANGHAI COMMERCIAL BANK LIMITED

(All amounts in HK dollar thousands unless otherwise stated)

## 7 Credit risk (Continued)

### (f) Overview of recognized credit risk mitigation as at 31 December 2025

	Exposures unsecured: carrying amount	Exposures to be secured	Exposures secured by recognized collateral	Exposures secured by recognized guarantees	Exposures secured by recognized credit derivative contracts
1 Loans	63,101,467	4,174,309	1,033,451	516,450	–
2 Debt securities	67,214,689	–	–	–	–
3 <b>Total</b>	<b>130,316,156</b>	<b>4,174,309</b>	<b>1,033,451</b>	<b>516,450</b>	<b>–</b>
4 Of which defaulted	3,152,535	–	–	–	–

### (g) Qualitative disclosures on use of ECAI ratings under STC approach

Under the standardized approach ("STC") for the calculation of credit risk within the Basel capital framework, banks are required to use credit assessments provided by external credit assessment institutions ("ECAIs"), recognized by the Hong Kong Monetary Authority for the purposes of regulatory capital calculation, to determine the risk-weights of the banks' credit exposures.

S&P Global Ratings, Moody's Investors Service, Fitch Ratings and Rating and Investment Information, Inc. are the ECAIs that the Group has used for the determination of risk weightings for the following classes of exposure:

- Sovereign exposures;
- Public sector entity exposures;
- Multilateral development bank exposures;
- Unspecified multilateral body exposures;
- Eligible covered bond exposures;
- Bank exposures;
- Qualifying non-bank financial institutions exposures;
- General corporate exposures; and
- Specialized lending exposures.

The mapping of ECAI ratings of the above nine classes of exposure to the risk weights under STC follows the process as prescribed in Part 4 of the Banking (Capital) Rules. Where an exposure of debt securities has an issue-specific external credit assessment, such assessment will be used. In case there is no specific issue rating published by the ECAI, the issuer rating is applied to the senior unsecured claims of that issuer subject to the conditions prescribed by the BCR.

# SHANGHAI COMMERCIAL BANK LIMITED

(All amounts in HK dollar thousands unless otherwise stated)

## 7 Credit risk (Continued)

### (h) Credit risk exposures and effects of recognized credit risk mitigation – for STC approach as at 31 December 2025

Exposure classes	Exposures pre-CCF and pre-CRM		Exposures post-CCF and post-CRM		RWA and RWA density	
	On-balance sheet amount	Off-balance sheet amount	On-balance sheet amount	Off-balance sheet amount	RWA	RWA density
1 Sovereign exposures	10,924,027	–	10,930,899	–	61	0%
2 Public sector entity exposures	5,403,929	1,250,000	5,913,510	500,000	1,282,702	20%
3 Multilateral development bank exposures	2,420,038	–	2,420,038	–	–	0%
3a Unspecified multilateral body exposures	–	–	–	–	–	–
4 Bank exposures	112,654,228	2,190,480	112,654,228	1,198,432	27,554,621	24%
4a Qualifying non-bank financial institution exposures	935,714	389,080	935,714	38,908	477,050	49%
5 Eligible covered bond exposures	–	–	–	–	–	–
6 General corporate exposures	31,369,228	16,746,745	30,872,546	3,085,373	26,392,554	78%
6a Of which: non-bank financial institution exposures excluding those reported under row 4a	–	–	–	–	–	–
6b Specialized lending	–	–	–	–	–	–
7 Equity exposures	–	–	–	–	–	–
7a Significant capital investments in commercial entities	–	–	–	–	–	–
7b Holdings of capital instruments issued by, and non-capital LAC liabilities of, financial sector entities	–	–	–	–	–	–
7c Subordinated debts issued by banks, qualifying non-bank financial institutions and corporates	–	–	–	–	–	–
8 Retail exposures	2,320,850	6,621,570	1,970,598	730,289	2,292,504	85%
8a Exposures arising from IPO financing	–	–	–	–	–	–

# SHANGHAI COMMERCIAL BANK LIMITED

(All amounts in HK dollar thousands unless otherwise stated)

## 7 Credit risk (Continued)

### (h) Credit risk exposures and effects of recognized credit risk mitigation – for STC approach as at 31 December 2025 (Continued)

Exposure classes		Exposures pre-CCF and pre-CRM		Exposures post-CCF and post-CRM		RWA and RWA density	
		On-balance sheet amount	Off-balance sheet amount	On-balance sheet amount	Off-balance sheet amount	RWA	RWA density
9	Real estate exposures	45,508,163	4,518,996	44,804,511	958,518	39,001,566	85%
9a	Of which: regulatory residential real estate exposures (not materially dependent on cash flows generated by mortgaged properties)	6,709,334	1,582,841	6,192,884	633,137	2,163,433	32%
9b	Of which: regulatory residential real estate exposures (materially dependent on cash flows generated by mortgaged properties)	831,183	–	831,183	–	323,041	39%
9c	Of which: regulatory commercial real estate exposures (not materially dependent on cash flows generated by mortgaged properties)	1,333,914	7,294	1,333,914	2,318	936,391	70%
9d	Of which: regulatory commercial real estate exposures (materially dependent on cash flows generated by mortgaged properties)	17,499,718	91,350	17,370,496	17,616	15,090,865	87%
9e	Of which: other real estate exposures (not materially dependent on cash flows generated by mortgaged properties)	14,045,956	2,733,084	13,995,305	285,029	12,885,795	90%
9f	Of which: other real estate exposures (materially dependent on cash flows generated by mortgaged properties)	1,257,290	–	1,254,738	–	1,882,107	150%
9g	Of which: land acquisition, development and construction exposures	3,830,768	104,427	3,825,991	20,418	5,719,934	149%
10	Defaulted exposures	3,335,149	44,110	3,335,149	7,459	4,949,864	148%
11	Other exposures	4,115,452	–	4,115,452	–	4,115,452	100%
11a	Cash and gold	765,691	–	1,799,824	–	120,940	7%
11b	Items in the process of clearing or settlement	345,608	–	345,608	–	2	0%
<b>12</b>	<b>Total</b>	<b>220,098,077</b>	<b>31,760,981</b>	<b>220,098,077</b>	<b>6,518,979</b>	<b>106,187,316</b>	<b>47%</b>

# SHANGHAI COMMERCIAL BANK LIMITED

(All amounts in HK dollar thousands unless otherwise stated)

## 7 Credit risk (Continued)

### (i) Credit risk exposures by exposure classes and by risk weights – for STC approach as at 31 December 2025

	0%	10%	15%	20%	25%	30%	35%	40%	45%	50%	65%
1 Sovereign exposures	10,930,595			304						-	
2 Public sector entity exposures	-			6,413,510						-	
3 Multilateral development bank exposures	2,420,038					-				-	
3a Unspecified multilateral body exposures				-		-				-	
4 Bank exposures				72,397,739		38,261,942		-		3,192,979	
4a Qualifying non-bank financial institution exposures				-		564,258		-		-	
5 Eligible covered bond exposures		-	-	-	-	-	-			-	
6 General corporate exposures				1,885,048		-				10,678,893	
6a Of which: non-bank financial institution exposures excluding those reported under row 4a				-		-				-	
6b Specialized lending				-						-	
7 Equity exposures											
7a Significant capital investments in commercial entities											
7b Holdings of capital instruments issued by, and non-capital LAC liabilities of, financial sector entities											
7c Subordinated debts issued by banks, qualifying non-bank financial institutions and corporates											
8 Retail exposures									495,633		
8a Exposures arising from IPO financing	-										

# SHANGHAI COMMERCIAL BANK LIMITED

(All amounts in HK dollar thousands unless otherwise stated)

## 7 Credit risk (Continued)

### (i) Credit risk exposures by exposure classes and by risk weights – for STC approach as at 31 December 2025 (Continued)

	75%	80%	85%	100%	130%	150%	250%	400%	1250%	Other	Total credit exposure amount (post-CCF and post-CRM)
1 Sovereign exposures				-		-				-	10,930,899
2 Public sector entity exposures				-		-				-	6,413,510
3 Multilateral development bank exposures				-		-				-	2,420,038
3a Unspecified multilateral body exposures				-		-				-	-
4 Bank exposures	-			-		-				-	113,852,660
4a Qualifying non-bank financial institution exposures	410,364			-		-				-	974,622
5 Eligible covered bond exposures				-						-	-
6 General corporate exposures	1,548,135		2,205,639	17,640,204		-				-	33,957,919
6a Of which: non-bank financial institution exposures excluding those reported under row 4a	-		-	-		-				-	-
6b Specialized lending	-	-		-	-	-				-	-
7 Equity exposures							-	-		-	-
7a Significant capital investments in commercial entities							-	-	-	-	-
7b Holdings of capital instruments issued by, and non-capital LAC liabilities of, financial sector entities						-	-	-		-	-
7c Subordinated debts issued by banks, qualifying non-bank financial institutions and corporates						-				-	-
8 Retail exposures	544,040			1,659,412						1,802	2,700,887
8a Exposures arising from IPO financing										-	-

# SHANGHAI COMMERCIAL BANK LIMITED

(All amounts in HK dollar thousands unless otherwise stated)

## 7 Credit risk (Continued)

### (i) Credit risk exposures by exposure classes and by risk weights – for STC approach as at 31 December 2025 (Continued)

		0%	20%	25%	30%	35%	40%	45%	50%	60%	65%
9	Real estate exposures	-	2,249,492	1,207,869	2,290,284	179,822	311,583	338,605	198,605	995,741	
9a	Of which: regulatory residential real estate exposures (not materially dependent on cash flows generated by mortgaged properties)		2,249,492	1,207,869	1,986,921		311,583	48,184	198,605	-	
9b	Of which: no loan splitting applied		2,249,492	1,207,869	1,986,921		311,583	48,184	198,605	-	
9c	Of which: loan splitting applied (secured)										
9d	Of which: loan splitting applied (unsecured)										
9e	Of which: regulatory residential real estate exposures (materially dependent on cash flows generated by mortgaged properties)				303,363	179,822		290,421		30,964	
9f	Of which: regulatory commercial real estate exposures (not materially dependent on cash flows generated by mortgaged properties)	-	-		-		-		-	964,777	
9g	Of which: no loan splitting applied	-	-		-		-		-	964,777	
9h	Of which: loan splitting applied (secured)										
9i	Of which: loan splitting applied (unsecured)										
9j	Of which: regulatory commercial real estate exposures (materially dependent on cash flows generated by mortgaged properties)										
9k	Of which: other real estate exposures (not materially dependent on cash flows generated by mortgaged properties)	-	-		-		-		-		
9l	Of which: no loan splitting applied	-	-		-		-		-		
9m	Of which: loan splitting applied (secured)										
9n	Of which: loan splitting applied (unsecured)										
9o	Of which: other real estate exposures (materially dependent on cash flows generated by mortgaged properties)										
9p	Of which: land acquisition, development and construction exposures										

# SHANGHAI COMMERCIAL BANK LIMITED

(All amounts in HK dollar thousands unless otherwise stated)

## 7 Credit risk (Continued)

### (i) Credit risk exposures by exposure classes and by risk weights – for STC approach as at 31 December 2025 (Continued)

	70%	75%	85%	90%	100%	105%	110%	150%	Other	Total credit exposure amount (post-CCF and post-CRM)
9 Real estate exposures	8,378,328	2,109,647	5,873,080	5,030,456	6,768,422	4,965	4,782,739	5,001,787	41,604	45,763,029
9a Of which: regulatory residential real estate exposures (not materially dependent on cash flows generated by mortgaged properties)	803,411	-				-			19,956	6,826,021
9b Of which: no loan splitting applied	803,411	-				-			19,956	6,826,021
9c Of which: loan splitting applied (secured)										
9d Of which: loan splitting applied (unsecured)										
9e Of which: regulatory residential real estate exposures (materially dependent on cash flows generated by mortgaged properties)		-		-		4,965			21,648	831,183
9f Of which: regulatory commercial real estate exposures (not materially dependent on cash flows generated by mortgaged properties)		-	92,852		278,603			-	-	1,336,232
9g Of which: no loan splitting applied		-	92,852		278,603			-	-	1,336,232
9h Of which: loan splitting applied (secured)										
9i Of which: loan splitting applied (unsecured)										
9j Of which: regulatory commercial real estate exposures (materially dependent on cash flows generated by mortgaged properties)	7,574,917			5,030,456			4,782,739		-	17,388,112
9k Of which: other real estate exposures (not materially dependent on cash flows generated by mortgaged properties)		2,109,647	5,780,228		6,390,459			-	-	14,280,334
9l Of which: no loan splitting applied		2,109,647	5,780,228		6,390,459			-	-	14,280,334
9m Of which: loan splitting applied (secured)										
9n Of which: loan splitting applied (unsecured)										
9o Of which: other real estate exposures (materially dependent on cash flows generated by mortgaged properties)								1,254,738	-	1,254,738
9p Of which: land acquisition, development and construction exposures					99,360			3,747,049	-	3,846,409

# SHANGHAI COMMERCIAL BANK LIMITED

(All amounts in HK dollar thousands unless otherwise stated)

## 7 Credit risk (Continued)

(i) Credit risk exposures by exposure classes and by risk weights – for STC approach as at 31 December 2025 (Continued)

		0%	20%	50%	100%	150%	1250%	Other	Total credit exposure amount (post-CCF and post-CRM)
10	Defaulted exposures				128,097	3,214,511		–	3,342,608
11	Other exposures				4,115,452		–	–	4,115,452
11a	Cash and gold	1,340,161			36,259			423,404	1,799,824
11b	Items in the process of clearing or settlement	345,598	10					–	345,608

Exposure amounts and CCFs applied to off-balance sheet exposures, categorized based on risk bucket of converted exposures (STC version)

Risk weight	On-balance sheet exposure	Off-balance sheet exposure (pre-CCF)	Weighted average CCF*	Exposure (post-CCF and post-CRM)
1 Less than 40%	139,626,057	3,054,329	43%	140,930,029
2 40–70%	23,103,460	5,882,994	26%	24,612,014
3 75%	4,247,235	3,106,668	12%	4,612,187
4 85%	6,994,423	6,152,737	18%	8,078,719
5 90–100%	33,152,100	13,406,208	17%	35,378,303
6 105–130%	4,786,381	9,508	33%	4,789,506
7 150%	8,188,421	148,537	19%	8,216,298
8 250%	–	–	–	–
9 400%	–	–	–	–
10 1250%	–	–	–	–
11 <b>Total exposures</b>	220,098,077	31,760,981	21%	226,617,056

\* Weighting is based on off-balance sheet exposure (pre-CCF)

# SHANGHAI COMMERCIAL BANK LIMITED

(All amounts in HK dollar thousands unless otherwise stated)

## 8 Counterparty credit risk

### (a) Qualitative disclosures related to counterparty credit risk (including those arising from clearing through CCPs)

Counterparty credit risk arises from over-the-counter (“OTC”) derivative contracts and securities financing transactions both in trading and banking books, and is subject to the same risk management framework. Credit equivalent amount and capital charge for the relevant counterparty credit exposures are determined following the regulatory capital requirements. The Group adopts the standardized (counterparty credit risk) approach (“SA-CCR”) to measure the credit equivalent amount, which comprises replacement cost and potential future exposure, multiplied by a scaling factor of 1.4. The relevant counterparty default risk capital charge is calculated under the standardized approach.

The Group exercises strict control over counterparty credit risk exposure, including central counterparty (“CCP”). All credit limits are established in advance of transaction. Credit risk exposure is captured, monitored and reported in accordance with the Group risk methodologies. The credit risk exposures associated with these contracts are predominantly their positive marked-to-market values. These credit risk exposures together with potential exposures from market movements are managed as part of the overall lending limits allowed to counterparties. In instance of financial institutions, close –out netting agreement (International Swaps and Derivatives Association “ISDA”) and/or collateral netting agreement (Credit Support Annex “CSA”) are used, while the Group generally requires margin deposits from corporate, commercial and retail customers for risk mitigation purpose. Under the terms of the ISDA and CSA with counterparties, there is no linkage between the Group’s credit ratings and collateral requirements. As such, the impact of downgrade of the Group’s credit rating to the collateral is minimal.

Wrong-way risk occurs when the probability of default of a counterparty is positively correlated with general market risk factors (general wrong-way risk), and when exposure to a counterparty is positively correlated with the probability of default of the counterparty due to the nature of the transactions with the counterparty (specific wrong-way risk). The Group monitors and mitigates wrong-way risk by restricting the receipt of eligible collateral to low-risk and high-liquidity cash and bonds issued by sovereigns, central banks and multilateral development banks.

### (b) Analysis of counterparty credit risk exposures (other than those to CCPs) by approaches as at 31 December 2025

		Replacement cost (RC)	PFE	Effective EPE	Alpha (α) used for computing default risk exposure	Default risk exposure after CRM	RWA
1	SA-CCR approach (for derivative contracts)	141,729	684,803		1.4	1,157,145	613,013
1a	CEM (for derivative contracts)	–	–		1.4	–	–
2	IMM (CCR) approach			–	–	–	–
3	Simple approach (for SFTs)					–	–
4	Comprehensive approach (for SFTs)					–	–
5	VaR (for SFTs)					–	–
6	<b>Total</b>						<b>613,013</b>

# SHANGHAI COMMERCIAL BANK LIMITED

(All amounts in HK dollar thousands unless otherwise stated)

## 8 Counterparty credit risk (Continued)

### (c) Counterparty credit risk exposures (other than those to CCPs) by exposure classes and by risk weights – for STC approach as at 31 December 2025

Exposure class	Risk weight											Total default risk exposure after CRM
	0%	10%	20%	30%	40%	50%	75%	85%	100%	150%	Others	
1 Sovereign exposures	-	-	-	-	-	-	-	-	-	-	-	-
2 Public sector entity exposures	-	-	-	-	-	-	-	-	-	-	-	-
3 Multilateral development bank exposures	-	-	-	-	-	-	-	-	-	-	-	-
4 Unspecified multilateral body exposures	-	-	-	-	-	-	-	-	-	-	-	-
5 Bank exposures	-	-	622,504	19,694	-	-	-	-	-	-	-	642,198
6 Qualifying non-bank financial institution exposures	-	-	-	-	-	-	-	-	-	-	-	-
7 General corporate exposures	-	-	-	-	-	64,687	-	-	233,477	-	-	298,164
8 Retail exposures	-	-	-	-	-	-	-	-	216,783	-	-	216,783
9 Defaulted exposures	-	-	-	-	-	-	-	-	-	-	-	-
10 Other exposures	-	-	-	-	-	-	-	-	-	-	-	-
11 Total	-	-	622,504	19,694	-	64,687	-	-	450,260	-	-	1,157,145

### (d) Composition of collateral for counterparty credit risk exposures (including those for contracts or transactions cleared through CCPs) as at 31 December 2025

		Derivative contracts				SFTs	
		Fair value of recognized collateral received		Fair value of posted collateral		Fair value of recognized collateral received	Fair value of posted collateral
		Segregated	Unsegregated	Segregated	Unsegregated		
1	Cash – domestic currencies	-	-	-	9,479	-	-
2	Cash – other currencies	-	79,615	-	129,242	-	-
3	Total	-	79,615	-	138,721	-	-

### (e) Credit-related derivatives contracts

The Group did not have any credit-related derivatives contracts as at 31 December 2025.

### (f) Exposures to CCPs

The Group did not have any exposures to CCPs as at 31 December 2025.

# SHANGHAI COMMERCIAL BANK LIMITED

(All amounts in HK dollar thousands unless otherwise stated)

## 9 Credit valuation adjustment (“CVA”) risk

### (a) Qualitative disclosures related to CVA risk

CVA is an adjustment to the fair value of derivative instruments to reflect the counterparty credit risk in derivative valuations. It represents the change in the market value of those derivatives due to the possibility that the Group’s counterparties may default on their obligations. CVA risk arises from fluctuations in this adjustment due to changes in counterparty credit spreads and relevant market risk factors. The Group adopts the reduced basic CVA (“BA-CVA”) approach to calculate RWA and capital charges for CVA risk, and it is not applicable to the Group to set its RWA for CVA risk at 100% of its RWA for counterparty credit risk exposures as prescribed under the BCR.

The Group has established a policy that governs the management of counterparty credit risk, including CVA risk. The policy is reviewed and approved by the Board on a regular basis. The capital consumption arising from the underlying CVA exposures is calculated by the Risk Management Division and reviewed by senior management. The Group does not hedge its CVA risk given that the derivative transactions are primarily used for hedging its underlying positions and the exposure is considered immaterial to the Group’s operations.

### (b) CVA risk under reduced basic CVA approach as at 31 December 2025

		Components	CVA risk capital charge under the reduced basic CVA approach
1	Aggregation of systematic components of CVA risk	83,869	
2	Aggregation of idiosyncratic components of CVA risk	17,902	
3	Total		29,061

## 10 Market risk

### (a) Qualitative disclosures related to market risk

Market risk is the risk that interest rates, foreign exchange rates, equity or commodity prices will move relative to positions taken, resulting in profits or losses. In the ordinary course of business, the Group enters into various types of financial instruments, mainly foreign exchange contracts, that comprise transactions initiated for the Group’s own account and customer needs.

The Group’s positions are managed by the Treasury Division under the limits and guidelines laid down in the relevant policies approved by the Risk Committee. The Risk Management Division is responsible for monitoring the transactions to ensure the activities are within the relevant limits and guidelines.

Further information on the management of foreign exchange risk and interest rate risk is provided in Note 3.2.3 and Note 3.2.5 of Notes to the Consolidated Financial Statements respectively.

#### Market risk measurement

The measuring procedures and limit structure used for market risk management have been approved by the Risk Committee. Limits on notional, stop loss and sensitivity are set for trading positions which are marked-to-market daily. Stress tests provide an indication of the potential size of losses that could arise in extreme conditions. The stress testing is tailored to the business and typically uses scenario analysis. The results of the stress tests are reviewed by management, the Asset and Liability Committee, the Risk Committee and the Board.

The Group maintains a robust control framework for determining which instruments are to be included in, and excluded from, the trading book for the purpose of calculating the market risk capital charge. The financial instruments mandated to be designated as trading, those presumed to be trading and those excluded from a trading designation are delineated in the relevant policy. The Group’s investment in the listed equity of a long-standing strategic partner is designated as a banking book instrument following the HKMA’s exemption approval. Both the market and gross fair value of this investment are HK\$4,798 million. No instruments have been moved between the banking book and trading book since the last reporting period.

# SHANGHAI COMMERCIAL BANK LIMITED

(All amounts in HK dollar thousands unless otherwise stated)

## 10 Market risk (Continued)

### (a) Qualitative disclosures related to market risk (Continued)

#### Market risk measurement (Continued)

The Group measures the exposure of its assets and liabilities to fluctuations in interest rates primarily by way of gap analysis which provides the Group with a static view of the maturity and re-pricing characteristics of balance sheet positions. An interest rate gap report is prepared by classifying all assets and liabilities into various time period categories according to contracted maturities or anticipated re-pricing dates whichever is earlier. The difference in the amount of assets and liabilities maturing or being re-priced in any time period category would then give the Group an indication of the extent to which the Group is exposed to the risk of potential changes in the net interest income.

The Group uses different types of derivatives to manage foreign exchange and interest rate sensitivity primarily by hedging its underlying positions. The derivatives used by the Group including foreign exchange and interest rate contracts which are typically made over-the-counter and are managed within limits approved by the Risk Committee. The Group uses foreign exchange instruments, including derivatives, to mitigate foreign exchange risk arising from FX rate changes that will affect the fair value of equity instruments. Hedge effectiveness is assessed at inception on a prospective basis and is reassessed on an ongoing basis, based on actual experience and valuation.

### (b) Market risk under STM approach as at 31 December 2025

	Market risk capital charges under STM approach
1 General interest rate risk	22,290
2 Equity risk	–
3 Commodity risk	7,239
4 Foreign exchange risk	544,254
5 Credit spread risk (non-securitization)	2,692
6 Credit spread risk (securitization: non-correlation trading portfolio ("CTP"))	–
7 Credit spread risk (securitization: CTP)	–
8 Standardized default risk charge ("SA-DRC") (non-securitization)	834
9 SA-DRC (securitization: non-CTP)	–
10 SA-DRC (securitization: CTP)	–
11 Residual risk add-on	89
12 Total	577,398

## 11 Operational risk

### (a) General information on operational risk framework

#### Policies, frameworks and guidelines for the management of operational risk

Operational risk refers to the risk of loss resulting from inadequate or failed internal processes, people and systems, or from external events. It is inherent in all products, activities, processes and systems.

The Compliance and Operational Risk Management Committee ("CORMC") is responsible for governing and overseeing matters related to the management of the Group's operational risks.

The Operational Risk Management Department ("ORMD") under the Risk Management Division, as a second line of defense function, supports the business and support units in controlling and managing operational risks arising from their activities in accordance with the controls and procedures outlined in the operational risk management policy approved by the Risk Committee.

The operational risk management policy prescribes key aspects of the three lines of defense model and operational risk management tools to facilitate effective identification, assessment, mitigation, monitoring and reporting of operational risks. Additionally, a Business Continuity Plan and an Operational Resilience Framework have been established to ensure the Group's ability to operate on an ongoing basis and limit losses in the event of severe business disruption, particularly where the Group's physical, telecommunication, or information technology infrastructures have been damaged or made inaccessible.

#### Organizational structure of operational risk management and control function

The ORMD reports directly to the Head of Risks. ORMD supports the CORMC in overseeing the Group's operational risk management. The following key activities are performed by the ORMD:

- **Policies & Procedures:** Develops, maintains, and implements the Group's operational risk control framework, including policies, guidelines, and procedures that govern operational, technology, reputation and strategic risks.
- **Operational Risk Management:** Manages the bank-wide operational risk framework, covering operational, technology, strategic, and reputation risks.
- **Business Continuity Planning:** Oversees the development, testing, and maintenance of the Bank's business continuity plans to ensure operational resilience.
- **Incident Management:** Investigates operational risk incidents, identifies root causes of control failures, and recommends corrective actions to risk owners for process and control improvement.
- **Monitoring & Assessment:** Establishes Key Performance Indicators to measure departmental efficiency and effectiveness. Conducts risk assessments, reviews, and monitoring activities to track operational risk performance against targets.
- **Thematic Reviews:** Performs control assurance reviews to validate the effectiveness of controls implemented by the first line of defence in addressing operational, technology, strategic, and reputation risks.
- **Reporting:** Prepares management reports on operational, technology, reputation, and strategic risks for submission to governance bodies, including Management Committees and Board-delegated Committees.
- **Product Governance:** Serves as Secretariat to the Product/Service Governance Committee, ensuring alignment with governance standards and regulatory requirements.

## 11 Operational risk (Continued)

### (a) General information on operational risk framework (Continued)

#### Operational risk measurement system

The Group employs the standardized approach for operational risk capital calculations.

The Group has implemented the Operational Risk Management System to record the bank-wide operational risk events. The Operational Risk Management System aids in quantifying operational risks and ensures the completeness and accuracy of operational risk events data. All business and support units, along with branches, are required to report any encountered operational risk events to the ORMD for follow-up, ensuring timely mitigation and management of these events.

#### Scope and main context of reporting framework on operational risk to senior management and to the Board of Directors

The ORMD ensures that regular risk reporting is carried out for senior management and the Board. A summary report on the Group's operational risk management activities is presented to the CORMC and Executive Committee, the Risk Committee, and the Audit Committee for review on a monthly, quarterly, and semi-annual basis respectively.

The reporting framework encompasses the identification, assessment, monitoring, and mitigation of operational risks across the Group. The main context of the reporting framework is to provide senior management and the Board with a clear understanding of the Group's operational risk profile and the effectiveness of operational risk management efforts.

#### Risk mitigation and risk transfer used in the management of operational risk

Qualitative disclosure is described in Note 3(a) of Regulatory Disclosure.

### (b) Historical losses

The Group is classified in Operational Risk Bucket 1 with an internal loss multiplier of 1, and has not included any operational loss data into the calculation of its capital charge for operational risk.

# SHANGHAI COMMERCIAL BANK LIMITED

(All amounts in HK dollar thousands unless otherwise stated)

## 11 Operational risk (Continued)

### (c) Business indicator (BI) and business indicator components breakdown

#### (i) Business indicator components breakdown

BI and its subcomponents		For the year ended 31 December		
		2025	2024	2023
1	Interest, leases and dividend component	4,552,459		
1a	Interest and leases income	8,659,519	10,440,691	9,987,056
1b	Interest and leases expenses	4,448,380	6,165,784	5,715,362
1c	Interest earning assets	215,140,366	215,406,893	215,345,990
1d	Dividend income	293,637	378,886	227,114
2	Services component	1,014,952		
2a	Fee and commission income	836,352	634,468	645,497
2b	Fee and commission expenses	61,310	62,996	55,227
2c	Other operating income	648,404	138,804	141,330
2d	Other operating expenses	341	146	510
3	Financial component	373,564		
3a	Net P&L on trading book	442,614	301,853	292,395
3b	Net P&L on banking book	71,610	9,696	2,523
4	BI	5,940,975		
5	Business indicator component (BIC)	712,917		

#### (ii) Disclosure on the BI – divested businesses and activities

The Group did not have divested businesses and activities for the years 2023, 2024 and 2025.

#### (d) Minimum operational risk capital requirement

1	Business indicator component (BIC)	712,917
2	Internal loss multiplier (ILM)	1
3	Minimum operational risk capital requirement	712,917
4	Total RWA for operational risk	8,911,463

## 12 Liquidity risk

### (a) Qualitative disclosure related to liquidity risk management

#### Governance of liquidity risk management

Liquidity risk is the risk that the Group is unable to meet its payment obligations associated with its financial liabilities when they fall due and to replace funds when they are withdrawn.

The Board is ultimately responsible for overseeing the Group's liquidity risk management structure and approving the risk appetite statement. The Risk Committee is delegated by the Board to oversee the Group's liquidity risk management, including approval of liquidity risk management policies and risk limits. The Asset and Liability Committee is delegated by the Board to oversee the Group's investment and funding strategies, particularly to ensure that the Bank has adequate funds to meet its obligations.

The Group's day-to-day liquidity is managed by the Treasury Division in accordance with the guidelines and procedures outlined in the liquidity risk management policy. The Risk Management Division is responsible for identifying, measuring, monitoring, and controlling the liquidity risk associated with the Group's activities within the liquidity risk management framework.

In accordance with the relevant legal and regulatory requirements, and the Group's risk appetite, Liquidity Risk Management Policy was established to outline the principles and strategies for managing liquidity risk. This Policy includes requirements for various risk limits to control risk exposure under an acceptable risk tolerance level, as well as guidelines for monitoring, reporting, and implementing control mechanisms. The Liquidity Risk Management Policy is reviewed and endorsed by the Asset and Liability Committee and approved by the Risk Committee at least annually.

#### Liquidity risk management

The Bank's operation is mainly funded by customer deposits and shareholders' funds. Diversified and stable funding sources are maintained by determining the appropriate mix of liabilities and building strong and lasting relationships with key fund providers in accordance with the liquidity risk management policy.

Liquidity is managed on a group basis, covering both the operations in and outside Hong Kong as well as all related entities of the Bank. The formulation and management of the Group's funding strategy is centralised at the Treasury Division.

Adequate liquidity will be maintained at all times to meet obligations when they fall due in normal circumstances and an appropriate mix of additional stock of high quality liquid assets will be maintained to provide contingent liquidity in the event of a funding crisis. The normal borrowing capacity to obtain funds in the interbank market is estimated based on past experience and the wholesale funding need for both local and foreign currencies are limited to the amount which are comfortably within that borrowing capacity.

Liquidity risk is managed with regard to a variety of factors, including the liquidity maintenance ratio, core funding ratio, loan to deposit ratio, size of the liquidity cushion, maturity mismatch profile, the diversity and stability of the deposit base, and the ability to borrow in the interbank market to ensure that both the funding liquidity and market liquidity are properly handled. An adequate stock of high quality liquid assets is maintained at all times in order to enable the Group to meet deposit withdrawals, to repay interbank borrowings, and to make new loans and investments as and when required in a timely and cost effective manner under both normal business conditions and emergency situations.

#### Stress testing

The stress-testing results form an important component in assisting the Risk Committee in reviewing and endorsing the Group's risk tolerance levels, which are defined by internal limits on various risk ratios, as well as assisting the Asset and Liability Committee in managing the overall liquidity of the Group and to make informed strategic business decisions.

#### Contingency funding plan

The Contingency Funding Plan is a component of the Group's Business Continuity Plan, and describes the Group's strategy for dealing with any liquidity problems, and the procedures for making up cash flow deficits in emergency situations.

## 12 Liquidity risk (Continued)

### (b) Quantitative disclosure

#### Customised measurement tools or metrics

A cash-flow approach is adopted to managing liquidity risk by ensuring that a net positive cash-flow position is maintained or otherwise sufficient cash can be generated from assets or funding sources to cover any funding shortfalls. The starting point for the projection is an analysis of the contractual maturity of the financial liabilities and the expected collection date of the financial assets. The projection is forward-looking and covers liquidity risks stemming from on-balance sheet assets and liabilities and off-balance sheet positions. Cash-flow projection is made over daily time bands of up to 7 days ahead and wider time bands of up to 1 year ahead. Internal limits are set to control the size of the cumulative net mismatch positions for the shorter-term time bands. Cash-flow projection covers positions in HK dollar and in all currencies in aggregate. Separate cash-flow projections are also performed for individual foreign currencies in which there are significant positions, such as US dollar and the renminbi.

#### Concentration limits on collateral pools and sources of funding

Retail deposits account for an important part of the Group's funding base, and the composition and quality of such deposits are carefully monitored and managed. Core deposits are characterised by their stability and reliability and are identified based on internally defined criteria. An internal target is set for the proportion of core deposits against total deposits.

#### Liquidity exposures and funding needs at the level of individual legal entities, foreign branches and subsidiaries

The Group is not required to calculate the liquidity coverage ratio ("LCR") and net stable funding ratio ("NSFR") under the Banking (Liquidity) Rules. Instead, the Liquidity Maintenance Ratio ("LMR") and the Core Funding Ratio ("CFR") are used to measure respectively the short-term and long-term liquidity exposures of the Group against its funding needs. The LMR is the ratio of liquefiable assets to qualifying liabilities for the coming one month. Under the Banking (Liquidity) Rules, the Group is subject to the statutory limit of the LMR, which is prescribed at 25%. The CFR is the ratio of the amount of available core funding to the amount of required core funding and measures the availability of funding from capital and liabilities to cover the amount of assets and off-balance sheet obligations that need to be funded. Under the Banking (Liquidity) Rules, the Group is under regulation to maintain a CFR of not less than 75% on average in each calendar month. Funding or liquidity support is provided to all branches outside of Hong Kong and such support is appropriately accounted for. The funding positions of the branches outside of Hong Kong are closely monitored and any regulatory or legal impediments to accessing liquidity will be addressed on a group basis. Other than branches outside of Hong Kong, the liquidity needs of other group companies are insignificant.

# SHANGHAI COMMERCIAL BANK LIMITED

(All amounts in HK dollar thousands unless otherwise stated)

## 12 Liquidity risk (Continued)

### (b) Quantitative disclosure (Continued)

#### Contractual maturity profile

	Next day	Within 1 month	> 1 month up to 3 months	> 3 months up to 1 year	> 1 year up to 5 years	Over 5 years	Balancing amount
Currency notes and coins	729,431	-	-	-	-	-	-
Amount receivable arising from derivative contracts	10,142	239,746	134,710	233,714	94,959	-	-
Due from MA for a/c of Exchange Fund	937,976	-	-	-	-	-	-
Due from overseas central banks	293,722	-	-	-	-	-	63,957
Due from banks	9,668,358	25,951,300	33,924,638	7,024,024	194,563	-	-
Debt securities, prescribed instruments and structured financial instruments held (net of short positions)	66,748,787	123,264	91,049	211,125	146,782	-	2,874
Acceptances and bills of exchange held	98,146	7,206	14,998	936	-	-	-
Loans and advances to non-bank customers	4,815,322	2,897,457	4,563,115	9,749,225	26,847,544	15,847,640	5,631,411
Other assets	388,477	534,846	227,529	474,037	1,080,979	288,460	9,440,708
<b>Total on-balance sheet assets</b>	<b>83,690,361</b>	<b>29,753,819</b>	<b>38,956,039</b>	<b>17,693,061</b>	<b>28,364,827</b>	<b>16,136,100</b>	<b>15,138,950</b>
<b>Total off-balance sheet claims</b>	<b>-</b>	<b>611,340</b>	<b>879,140</b>	<b>700,000</b>	<b>-</b>	<b>-</b>	<b>400,000</b>
Deposits from non-bank customers	58,899,880	42,963,285	57,993,277	15,157,370	182,392	28,402	-
Amount payable arising from derivative contracts	8,856	235,212	150,787	224,207	94,957	-	-
Due to MA for a/c of Exchange Fund	-	-	389,125	-	-	-	-
Due to banks	1,257,133	2,102,287	1,285,620	456,936	-	-	-
Other liabilities	475,237	954,591	552,531	524,081	65,011	57,219	-
Capital and reserves	-	-	-	-	2,702,108	-	41,199,893
<b>Total on-balance sheet liabilities</b>	<b>60,641,106</b>	<b>46,255,375</b>	<b>60,371,340</b>	<b>16,362,594</b>	<b>3,044,468</b>	<b>85,621</b>	<b>41,199,893</b>
<b>Total off-balance sheet obligations</b>	<b>7,572,959</b>	<b>1,884,760</b>	<b>1,183,247</b>	<b>3,213,933</b>	<b>1,652,735</b>	<b>1,486,139</b>	<b>-</b>
<b>Contractual Maturity Mismatch</b>	<b>15,476,296</b>	<b>(17,774,976)</b>	<b>(21,719,408)</b>	<b>(1,183,466)</b>	<b>23,667,624</b>	<b>14,564,340</b>	<b>-</b>
<b>Cumulative Contractual Maturity Mismatch</b>	<b>15,476,296</b>	<b>(2,298,680)</b>	<b>(24,018,088)</b>	<b>(25,201,554)</b>	<b>(1,533,930)</b>	<b>13,030,410</b>	<b>-</b>

# SHANGHAI COMMERCIAL BANK LIMITED

(All amounts in HK dollar thousands unless otherwise stated)

## 13 Interest rate risk in the banking book (“IRRBB”)

Qualitative disclosure and quantitative disclosure are described in Note 3.2.5 of Notes to the Consolidated Financial Statements.

## 14 Asset Encumbrance

The encumbered and unencumbered assets on the balance sheet as at 31 December 2025 are shown below.

	Encumbered assets*	Unencumbered assets	Total
Balances and placements with and advances to banks	376,901	78,409,541	<b>78,786,442</b>
Loans and advances to customers	–	67,275,776	<b>67,275,776</b>
Investment securities	3,725,391	69,080,932	<b>72,806,323</b>
Other assets	138,721	8,082,566	<b>8,221,287</b>
<b>Total</b>	<b>4,241,013</b>	<b>222,848,815</b>	<b>227,089,828</b>

\* Assets that the Group is restricted or prevented from liquidating, selling, transferring or assigning due to legal, regulatory, contractual or other limitations.

## 15 Non-bank mainland exposures

The Bank	2025			2024		
	On-balance sheet exposures	Off-balance sheet exposures	Total	On-balance sheet exposures	Off-balance sheet exposures	Total
Types of counterparties						
1. Central government, central government-owned entities and their subsidiaries and joint ventures	793,331	3,629	796,960	1,927,666	5,874	1,933,540
2. Local governments, local government-owned entities and their subsidiaries and joint ventures	74,907	–	74,907	–	–	–
3. PRC nationals residing in Chinese Mainland or other entities incorporated in Chinese Mainland and their subsidiaries and joint ventures	7,597,418	623,084	8,220,502	7,291,296	556,579	7,847,875
4. Other entities of central government not reported in item 1 above	448,292	–	448,292	371,145	–	371,145
5. Other entities of local governments not reported in item 2 above	–	–	–	142,316	–	142,316
6. PRC nationals residing outside Chinese Mainland or entities incorporated outside Chinese Mainland where the credit is granted for use in Chinese Mainland	3,276,708	324,836	3,601,544	4,350,673	192,124	4,542,797
7. Other counterparties where the exposures are considered by the reporting institution to be non-bank Chinese Mainland exposures	550,382	5	550,387	979,094	–	979,094
<b>Total</b>	<b>12,741,038</b>	<b>951,554</b>	<b>13,692,592</b>	<b>15,062,190</b>	<b>754,577</b>	<b>15,816,767</b>
Total assets after provisions	222,019,814			217,731,890		
On-balance sheet exposures as percentage of total assets	5.74%			6.92%		

# SHANGHAI COMMERCIAL BANK LIMITED

(All amounts in HK dollar thousands unless otherwise stated)

## 16 Currency concentrations

Equivalent in Hong Kong Dollars	2025						
	Spot assets	Spot liabilities	Forward purchases	Forward sales	Net options position	Net long/(short) position	Net structural position
US Dollars	86,374,000	(90,536,000)	49,976,000	(37,240,000)	(832,000)	7,742,000	6,817,000
Pound Sterling	5,373,000	(5,424,000)	796,000	(737,000)	-	8,000	3,000
Euro Dollars	1,115,000	(1,169,000)	4,176,000	(4,543,000)	409,000	(12,000)	-
Renminbi	13,957,000	(12,913,000)	3,783,000	(4,908,000)	-	(81,000)	5,202,000
Canadian Dollars	1,381,000	(1,382,000)	299,000	(372,000)	-	(74,000)	-
Australian Dollars	4,043,000	(4,040,000)	2,015,000	(2,009,000)	-	9,000	-
Other currencies and gold	6,709,000	(1,589,000)	7,411,000	(12,699,000)	423,000	255,000	-
	118,952,000	(117,053,000)	68,456,000	(62,508,000)	-	7,847,000	12,022,000

  

Equivalent in Hong Kong Dollars	2024						
	Spot assets	Spot liabilities	Forward purchases	Forward sales	Net options position	Net long/(short) position	Net structural position
US Dollars	91,976,000	(92,153,000)	40,583,000	(34,037,000)	3,000	6,372,000	7,010,000
Pound Sterling	6,507,000	(5,458,000)	1,739,000	(2,845,000)	-	(57,000)	3,000
Euro Dollars	1,020,000	(1,004,000)	1,561,000	(1,585,000)	-	(8,000)	-
Renminbi	15,628,000	(14,646,000)	9,219,000	(9,605,000)	-	596,000	4,752,000
Canadian Dollars	1,326,000	(1,273,000)	216,000	(223,000)	(1,000)	45,000	-
Australian Dollars	2,429,000	(2,408,000)	1,405,000	(1,406,000)	-	20,000	-
Other currencies and gold	2,638,000	(2,094,000)	7,551,000	(7,841,000)	(2,000)	252,000	-
	121,524,000	(119,036,000)	62,274,000	(57,542,000)	-	7,220,000	11,765,000

The net options position is calculated based on the delta-weighted positions of all foreign exchange option contracts.

The above disclosure is based on the significance of the Group's foreign currency exposures of the current year.

## 17 Disclosure on remuneration

### Guiding principles

The Bank aims to sustain long-term capital preservation and financial strength for the benefits of all stakeholders and is committed to promoting a sound corporate culture of prudent risk-taking at all levels of the Bank, with staff at all times conscientiously serving the Bank by adhering to the established values. The Remuneration Policy (the "Policy") of the Bank is designed to promote fairness and consistency in the compensation approach; to attract, motivate and retain talents, to create and sustain a strong corporate culture that would drive performance prudently and appropriately as well as to help achieve the business goals under prudent risk management principles.

The Policy applies to the Bank in Hong Kong and its subsidiaries, where appropriate. While the basic principles are applicable to branches outside Hong Kong, they are also subject to their local regulatory requirements in respective jurisdictions.

### Nomination and Remuneration Committee

The Nomination and Remuneration Committee (the "Committee") is established with written Terms of Reference defining its authority and duties, regarding the remuneration aspect, to oversee the formulation and implementation of a sound remuneration policy by the Bank, and to ensure its consistency with the Bank's culture, long-term business and risk appetite, performance and control environment, the best practices and applicable legal and regulatory requirements; to review and make recommendations to the Board on the remuneration packages of all Directors, Chief Executive, senior management and key personnel of the Bank; to ensure a regular review on the Bank's remuneration system and its operation; to ensure that no Director, Chief Executive or any of their associates is involved in deciding their own remuneration; and to review and make recommendations to the Board on culture-related matters of the Bank.

Directly appointed by the Board of the Bank, majority of the members of the Committee are Independent Non-executive Directors. The Committee is chaired by Mr. Johnson Mou Daid CHA. The other members are Mr. Stephen Ching-yen LEE, Mr. Gordon Che-keung KWONG and Ms. Alice Shing-mui LAW.

In 2025, the Committee held six physical meetings. Major tasks performed by the Committee are to review and approve the annual independent review report on the Bank's remuneration system carried out by the Internal Audit Department; to review and endorse the Remuneration Policy with revisions mainly about incorporating material credit risk taking personnel in the deferral arrangement of variable remuneration, enhancing the role of Chief Risk Officer in advising the Committee and the Chief Executive in relation to the discretionary bonus determination and vesting of deferred variable remuneration, and strengthening the role of the Committee in relation to across-the-board salary review; to review and recommend changes in discretionary bonus and across-the-board salary review cycles; to review the annual performance evaluation of Chief Executive and Deputy Chief Executives; to review and recommend to the Board discretionary bonus mechanism and the remuneration packages of senior management and key personnel (inclusive of the vesting of the previous years' deferred portion); and to review the culture-related matters of the Bank.

### Remuneration policy

The Committee reviews the Policy and the remuneration system at least annually and any material changes to the Policy will be submitted to the Board for approval. The review in 2025 mainly enhanced the scope of deferral arrangement of variable remuneration for better alignment with the expectation outlined in the Hong Kong Monetary Authority Supervisory Policy Manual CG-5 "Guideline on a Sound Remuneration System" ("CG-5"), leading to a more prudent remuneration system that is consistent with the Bank's risk appetite.

The Committee may at its discretion seek information and recommendations from relevant departments, committees or independent consultant as appropriate when conducting the review. The Bank has adopted the principle of conducting an independent review of the effectiveness of its remuneration system by an external consultant once every five years or more frequently on a need basis, with the Internal Audit Department conducting reviews in the intervening periods to ensure compliance with the principles set out in CG-5. In 2025, the Bank commissioned the Internal Audit Department to conduct the regular independent review.

## 17 Disclosure on remuneration (Continued)

### Remuneration of directors, senior management and key personnel

The Committee is responsible for making recommendations to the Board on the formulation and review of the remuneration packages for Directors, the Chief Executive, senior management and key personnel, with reference to the Bank's financial condition and future prospect, risk management framework, reward and people strategies. Such packages are subject to the final approval of the Board.

The following groups of employees have been identified as the "Senior Management" and "Key Personnel" as defined in CG-5:

"Senior management" of the Bank includes the Chief Executive, Deputy Chief Executives and Division Chiefs of the Bank who report directly to Chief Executive and are responsible for the development and execution of Bank-wide strategy and/or activities or those of the Bank's material business lines and are collectively responsible for the risks that may arise.

"Key personnel" refers to individual staff member whose duties or activities in the course of the employment involve the assumption of material risks or the taking on of material exposures on behalf of the Bank.

No individual director/staff or any of his/her associates shall be involved in deciding his/her own remuneration package.

### Remuneration structure

The remuneration package is a combination of fixed and variable remuneration. Fixed remuneration consists of basic salary, allowances and provident fund contribution. Variable remuneration takes into account the overall financial and non-financial performance of the Bank and individual business units, while individual performance is measured against the established key performance indicators, adherence to risk management policies, compliance with legal and regulatory requirements and ethical standards. The variable remuneration is awarded in the form of cash bonus and/or cash incentives.

A proportion of the variable remuneration of senior management and key personnel will be deferred and the vesting criteria of the deferred payment are subject to the impact of financial and non-financial factors over a period of time.

### Performance measurements and the distribution of variable remuneration

The Bank maintains a performance evaluation scheme to ensure individual staff performance, which covers financial, non-financial and risk factors, would be differentiated into various levels, and be adequately and effectively evaluated. Adverse performance in non-financial factors, such as non-adherence to risk management policies, non-compliance with internal and regulatory standards, shall outweigh financial achievements. Final approval of the discretionary bonus which is all cash-based is determined by various quantitative and qualitative assessment criteria set out in the performance appraisal system.

The employees within risk control functions are remunerated independently. The performance of business units where they oversee does not affect their remuneration. Management of business units should not be involved in determining the remuneration of the employees in risk control functions.

## 17 Disclosure on remuneration (Continued)

### Performance measurements and the distribution of variable remuneration (Continued)

When deciding the remuneration measures, the Bank shall also take into account certain key risk factors such as its asset quality, liquidity position, business environments, respective staff performance, the overall business results as well as long-term financial position. When reviewing and determining the discretionary bonus scheme, various financial and non-financial criteria including the individual performance of the staff by measuring against key performance indicators, adherence to the Bank's established values, implementation and accomplishment of business strategies, goals and objectives of the business and/or functional units under his/her supervision, compliance with regulatory requirements, adherence to risk management policies, code of conduct and ethical standards shall be taken into account. The overall performance of the Bank, and other factors that might have an impact on the future profitability, liquidity, financials and payout of the Bank should also be considered. The criteria of discretionary incentive payment shall include non-financial factors such as adherence to compliance and quality assurance requirements, positive customer outcomes including but not limited to customer satisfaction, providing accurate and sufficient information, offering right products and service offered, meeting customer reasonable expectation, and etc. which outweigh the quantitative targets. The established remuneration measures continued to apply in 2025. The timing and the portion of the performance related bonus distribution are vested in the Committee and finally with the Board. The bonus (or part of it) may be withheld if the Bank's performance is not justified, or if the business objectives are not achieved, or when it is necessary to protect the financial soundness of the Bank. In the event that a staff is accountable for serious misconduct behaviour, including but not limited to, non-compliance with applicable laws, rules, regulations, policies, guidelines, etc. that leads to significant loss for the Bank, fraud or serious breach of internal rules, the performance evaluation of the staff should record the incident. Further, the salary and variable remuneration reviews (bonus and/or incentive payment), if any, should consider to reflect the misconduct outcome such as a reduction in variable remuneration, after taking into account the relevant indicators of the severity of the impact to the Bank.

### Deferral arrangements

In view of the Bank's existing business model and organization structure, a portion of the discretionary bonus payment of senior management and key personnel is subject to an incremental deferral percentage to reflect their seniority, roles and responsibilities and bonus quantum, and vesting by equal portions over a period of three years in order to align with the long-term value creation and time horizons of risk. In circumstances where it is later established that any performance measurement is proven to have been manifestly misstated or based on erroneous assumptions, or it is later established that the employee concerned has committed fraud, malfeasance, or has violated material internal control policies or breached the relevant rules and regulations, all or part of the unvested deferred variable remuneration for a particular year shall be foregone.

# SHANGHAI COMMERCIAL BANK LIMITED

(All amounts in HK dollar thousands unless otherwise stated)

## 17 Disclosure on remuneration (Continued)

### Senior management and key personnel remuneration

Quantitative information on remuneration for the Bank's senior management and key personnel during the financial year of 2025, split into fixed and variable remuneration, is set out below:

Remuneration amount and quantitative information		Senior management	Key personnel
Fixed remuneration	Number of employees	10	14
	<b>Total fixed remuneration</b>	<b>30,208</b>	<b>27,696</b>
	Cash-based	30,208	27,696
	<i>Of which: deferred</i>	–	–
	Other forms		
	<i>Of which: deferred</i>	–	–
Variable remuneration	Number of employees	9	13
	<b>Total variable remuneration</b>	<b>37,818</b>	<b>15,574</b>
	Cash-based	37,818	15,574
	<i>Of which: deferred</i>	18,822	6,135
	Other forms	–	–
	<i>Of which: deferred</i>	–	–
<b>Total remuneration</b>		<b>68,026</b>	<b>43,270</b>

Notes:

- (i) Remuneration refers to all remuneration payable to employees during the year when being appointed as senior management or key personnel under the Remuneration Policy.
- (ii) For the purpose of Remuneration Policy, "senior management" of the Bank includes the Chief Executive, Deputy Chief Executives and Division Chiefs of the Bank who report directly to Chief Executive and are responsible for the development and execution of Bank-wide strategy and/or activities or those of the Bank's material business lines and are collectively responsible for the risks that may arise. "Key personnel" refers to employees whose duties or activities in the course of the employment involve the assumption of material risks or the taking on of material exposures on behalf of the Bank.

# SHANGHAI COMMERCIAL BANK LIMITED

(All amounts in HK dollar thousands unless otherwise stated)

## 17 Disclosure on remuneration (Continued)

### Senior management and key personnel remuneration (Continued)

Special Payments		Guaranteed bonuses		Sign-on awards		Severance payments	
		Number of employees	Total amount	Number of employees	Total amount	Number of employees	Total amount
1	Senior management	-	-	1	16,235	-	-
2	Key personnel	-	-	1	4,059	-	-

Deferred and retained remuneration in 2025	Total amount of outstanding deferred remuneration	Of which: Total amount of outstanding deferred and retained remuneration exposed to ex post explicit and/or implicit adjustment	Total amount of amendment during the year of 2025 due to ex post explicit adjustments	Total amount of amendment during the year of 2025 due to ex post implicit adjustments	Total amount of deferred remuneration paid out in financial year of 2025
<b>Senior management</b>					
Cash	18,114	18,114	2,238	-	7,879
Other	-	-	-	-	-
<b>Key personnel</b>					
Cash	10,137	10,137	47	-	3,272
Other	-	-	-	-	-
<b>Total</b>	<b>28,251</b>	<b>28,251</b>	<b>2,285</b>	<b>-</b>	<b>11,151</b>

Note:

- (i) The outstanding deferred remuneration in the financial year relates to the 2023, 2024 and 2025 variable remuneration.