

Supplier Code of Conduct

(Effective 22 September 2025)

Shanghai Commercial Bank Limited (the “Bank”) is dedicated to promoting sustainable development and strives to bring positive contributions to the global community. In pursuit of sustainability and corporate responsibility, the Bank seeks to work collaboratively with all supply chain partners to ensure its supply chain operates sustainably and responsibly.

All individuals or organizations that provide products or services to the Bank (“Supplier”) should have effective policies and measures to ensure their compliance with this Code. If the supplier is found to be non-compliant, the Bank will help provide support for improvement and/or review the terms of the contract at the Bank’s discretion.

The Bank upholds the highest ethical standards based on the Bank’s values, namely Proactive, Integrity, Respect, Professionalism, Teamwork, Accountability and Leadership, to ensure fair and responsible business practices throughout the operations. Suppliers are expected to abide by the following business principles:

Business Ethics

- Suppliers shall establish relevant mechanisms and practices to ensure business integrity such as embedding basic business standards in a Code of Conduct for staff members;
- Suppliers shall take all practical steps to avoid any forms of fraud, money laundering, bribery and corruption and refrain from offering or gaining improper advantages;
- Suppliers shall ensure adherence to national and international sanctions policy and legislation;
- Suppliers shall not engage in any attempt of unfair practices including but not limited to manipulation, concealment and abuse of privileged information; and
- Suppliers are encouraged to establish reasonable and lawful payment policies with their own suppliers.

Data Protection

- Suppliers shall at all times comply with Personal Data (Privacy) Ordinance or other applicable regulations and contractual requirements in relation to data protection;
- Suppliers shall not access or disclose private or confidential information about the Bank to third parties without being authorized in writing to do so unless mandated by law;
- Suppliers shall return or destroy all documents or materials that involve confidential, sensitive and proprietary information within the designated retention period decided by the Bank; and
- Suppliers shall immediately report any actual or suspected access, disclosure, leakage, or loss of the Bank's data.

Human Rights

- Suppliers shall not use any type of slavery and forced labour;
- Suppliers shall prohibit the use of child and underage labour and ensure that the employment of young workers is in accordance with local and national regulations on minimum age requirements;
- Suppliers shall ensure that employees are paid wages respective to local and national legislation on minimum wage requirements;
- Suppliers shall ensure that working hours are in accordance with local and national legislation;
- Suppliers shall assure that their operations are free from discrimination and harassment on any ground, including but not limited to sex, disability, race and family status, as adherence to relevant local and national regulations;
- Suppliers shall not prevent their employees from legally exercising the right of freedom of association such as joining labour unions; and
- Suppliers shall ensure that clear and uniformly applied disciplinary practices and grievance procedures are in place to prevent any forms of abuse.

Health and Safety

- Suppliers are encouraged to establish policies and procedures in relation to health and safety and shall provide a safe and hygienic work environment, abiding by applicable laws and regulations.

Community Impact

- Suppliers shall prevent any forms of human trafficking and respect the human rights of the people and communities in which they operate;
- Suppliers are encouraged to support fair-trade and ethical sourcing practices relevant to the products or services provided;
- Suppliers are encouraged to eliminate employment barriers to the disadvantaged; and
- Suppliers are encouraged to provide disability-friendly products and services.

Diversity and Inclusion

- Suppliers are encouraged to promote equal opportunity in employment, skill development and career advancement in the workplace; and
- Suppliers are encouraged to develop diverse businesses such as sourcing from small and medium or minority-owned enterprises to facilitate inclusive supply chain management.

Environmental

- Suppliers shall at all times comply with all relevant environmental laws and legislations;
- Suppliers shall minimize the use of hazardous materials and ensure that the handling or disposal of such materials is abided by applicable legislations;
- Suppliers are encouraged to establish a sound environmental policy to manage the environmental risks and impacts of their operations such as energy use, resources consumption and greenhouse gas emission; and
- Suppliers are encouraged to facilitate the adoption of environmentally friendly technology.

This Code will be reviewed annually by the Bank to ensure its relevancy and effectiveness.