

Slavery and Human Trafficking Statement for the year ended December 31, 2018

Shanghai Commercial Bank Limited (the “Bank”) is a financial institution incorporated in Hong Kong, and has branches in Hong Kong, Mainland China, the United States of America and the United Kingdom. The Bank offers a comprehensive range of retail and corporate banking services and products including deposits, securities trading, credit cards, insurance and wealth management services and corporate and personal loans.

The Bank upholds zero tolerance to modern slavery and human trafficking, and requires the Bank and its personnel to conduct business as well its service providers to render services ethically and with integrity. To implement and enforce the Modern Slavery Act promulgated in the United Kingdom, the Bank believes that its policies and procedures, system and people are integral components.

Corporate culture on ethics and equal opportunities

All the internal stakeholders of the Bank must adhere to the Bank’s Code of Conduct and Policy on Equal Opportunities with an aim to maintaining a good reputation of the Bank; upholding the highest ethical standards, which are based on the Bank’s values of Proactiveness, Integrity, Respect, Professionalism, Teamwork, Accountability and Leadership; and promoting an equal opportunity workplace to ensure no discrimination against any employees.

The Bank’s Supply Chain

For external stakeholders, the Customer Acceptance and Anti-Money Laundering and Counter-Terrorist Financing Policy and the Guidelines on Outsourcing and Insourcing have set out a risk-based approach on due diligence process in building and maintaining business relationship with customers and service providers.

Whistleblowing

In adhering to the Whistleblowing Policy of the Bank, a bank-wide grievance mechanism has been put in place to ensure the Bank's desired culture is understood and shared at all levels by internal and external stakeholders. The whistleblowing mechanism and the escalation measurement allow a timely reporting of any illegal, unethical and questionable practices observed by staff and stakeholders in a confidential setting without the risk of reprisals, enabling the reporting in confidence of any malpractice, impropriety, misconduct or unethical activity that they become aware of during the course of their work.

Training

On-going staff training is a crucial element of an effective system to prevent modern slavery and human trafficking activities. The Bank ensures the staff are adequately trained to implement the abovementioned policies and controls. Regular trainings are provided to ensure that the staff are reminded of their responsibilities and are kept informed of new developments related to modern slavery and human trafficking.

Independent assessment

In order to ensure the Bank, its subsidiary companies, branches and service providers to comply with the Modern Slavery Act, the Bank is taking steps to engage an external consultant to conduct an independent assessment on the effectiveness and efficiency of the Bank's existing anti-slavery and human trafficking controls and practice, and will implement their recommendations if any.

This statement shall be reviewed annually and as required to ensure its relevance and effectiveness.

This Statement has been reviewed by the Risk Committee of the Bank and is signed on behalf of the Board of Directors of Shanghai Commercial Bank Limited by the Managing Director & Chief Executive Mr. David S. C. Kwok on 29 March 2019.