

Shanghai Rural Commercial Bank Co., Ltd.

Key Points of the Debt Collection Policy (2026 Edition)

I. Purpose

To ensure the standardization of the collection business operations, in accordance with relevant laws, regulations, and industry provisions, including the *Law of the People's Republic of China on the Protection of Consumer Rights and Interests*, the *Interim Measures for the Administration of Internet Loans of Commercial Banks*, and the *Measures for the Supervision and Administration of the Credit Card Business of Commercial Banks*, Shanghai Rural Commercial Bank (hereinafter referred to as "the Bank") has formulated relevant debt collection management systems, such as the *Operating Procedures for the Management of Internal Collection Business for Online Retail Loans*, the *Operating Procedures for the Management of Outsourced Collection Institutions for Online Retail Loans*, the *Measures for the Management of Internal Collection Business for Credit Cards*, and the *Detailed Implementation Rules for the Management of Outsourced Collection Business for Credit Cards*. Through the aforementioned systems, the Bank has established an integrated collection system in which internal collection and outsourced collection complement each other.

II. Scope of Application

This policy applies to the Bank's online retail proprietary loans and credit

card business.

III. Management Mechanisms

The Bank clarifies that commonly used collection methods include telephone collection, text message collection, letter collection, on-site visits, and judicial litigation. The Bank establishes standardized collection processes and service specifications, and specifies that during the debt collection process, it is strictly prohibited to employ improper tactics such as harassment, intimidation, fraud, and threats to conduct collection; it is unequivocally forbidden to fraudulently use the names of administrative or judicial organs to trace customer information or conduct collection work; it is strictly prohibited to threaten customers on the grounds of inclusion on a fictitious blacklist or an illusory adverse credit database; collection or harassment directed at third parties unrelated to the debt is prohibited, and data and customer privacy protection work must be properly executed to prevent privacy breaches. The Bank routinely conducts quality control through methods such as randomized recording reviews and complaint analyses, accompanied by prompt rectifications, thereby guaranteeing the healthy and orderly progression of debt collection activities.

The Bank strictly conducts the admission and exit of outsourced institutions in accordance with relevant measures. The cooperation agreements executed with outsourced collection institutions (including

law firms) unequivocally stipulate information security and privacy protection clauses, requiring collection institutions to strictly comply with laws, regulations, and the Bank's internal management systems to ensure that outsourced collection is carried out in a standardized manner. The Bank explicitly prohibits collection institutions from employing violent collection methods, contacting unrelated third parties, engaging in fraudulent or impostor collections, or conducting unauthorized private collections, and clearly restricts collection channels, frequency, and hours. The Bank conducts ad-hoc on-site inspections and online supervision of all outsourced collection institutions based on business developments, ensuring that outsourced collection is carried out in a compliant and orderly manner.

IV. Training Requirements

The Bank administers normalized training for all internal collection personnel. Through the comprehensive interpretation of collection-related policies, regulations, and internal systems, the Bank conducts training on operational process norms, professional communication skills, and typical case analyses. This fortifies the legal awareness of collection personnel, elevates their compliance ethos and operational risk prevention acumen, and refines their communication proficiencies during collection.