

南京银行债务催收政策要点

Key Points of Debt Collection Policy of

Bank of Nanjing

南京银行股份有限公司（简称“本行”）严格遵守《国家金融监督管理总局江苏监管局办公室关于规范辖内银行业金融机构委外催收业务的指导意见》等监管文件及行业规范要求，制定落实《南京银行个人信贷业务授信后管理办法》《南京银行信用卡业务授信后管理办法》《南京银行批量外包催收管理办法》等文件，在债务催收过程中做好客户信息保密，要求催收人员不得采取故意伤害、恐吓、威胁等不正当手段进行催收。

Bank of Nanjing Co., Ltd. (“the Bank”) strictly complies with regulatory documents and industry standards such as the *Jiangsu Office of the National Financial Regulatory Administration Guidance Opinions on Regulating Outsourced Debt Collection Operations of Banking Financial Institutions*. The Bank has formulated and implemented the *Bank of Nanjing Post-Lending Management Measures for Personal Credit Business*, the *Bank of Nanjing Post-Lending Management Measures for Credit Card Business* and the *Measures for the Management of Bulk Outsourcing Debt Collection of Bank of Nanjing*. During the debt collection process, the Bank ensures confidentiality of customer information and prohibits collectors

from employing unlawful methods such as intentional harm, intimidation, or threats for debt collection.

一、适用范围

I. Scope of Application

本行债务催收政策要点适用于各分行及总行业务管理部门，覆盖个人类信贷资产、信用卡债权和小额公司类信贷资产等各类业务和产品。

The Bank's Key Points of Debt Collection Policy apply to all branches and business management departments at the Head Office, covering various businesses and products such as personal credit assets, credit card receivables, and small corporate credit assets.

二、工作机制

II. Working Mechanism

(一) 组织方式

(I) Organization

本行各部门紧密协同，合力做好债务催收管理工作，在保障合规要求及消费者合法权益的前提下，实现逾期贷款的有效处置和规范管理。总行资产保全部为本行批量外包催收事务的牵头管理部门，负责制定与持续完善我行批量外包催收管理制度，组织、指导与督促制度的执行和落实，并对批量外包债务催收管理情况进行检查监督；各分行及总行业务管理部门负责具体业务中的债务催收制度执行和细化落实。

All departments of the Bank work closely together to effectively manage debt collection operations, achieving effective disposal and standardized management of overdue loans while ensuring compliance with requirements and the legitimate rights and interests of consumers. The Head Office Asset Preservation Department serves as the leading department for bulk outsourcing debt collection matters, responsible for developing and continuously improving the Bank's bulk outsourcing debt collection management policy, organizing and guiding the implementation of the policy, as well as conducting inspections to monitor compliance. Meanwhile, all branches and business management departments at the Head Office are tasked with executing the specific debt collection procedures in accordance with the policy.

(二) 还款提醒及催收方式

(II) Repayment reminders and collection methods

本行采取差异化的还款提醒服务，包括贷款到期前和逾期后的还款提示。催收方式包括短信通知、智能机器人外呼、人工语音外呼、信函催收、属地上门催收等。本行持续规范催收流程管理，确保催收行为合法合规。

The Bank implements differentiated repayment reminders, including those prior to loan maturity and following overdue payments. Collection methods include SMS notifications, automated voice calls via intelligent robots, manual voice calls,

written correspondence, and on-site visits. The Bank continuously improves the standards for management of collection processes to ensure all collection activities remain compliant with legal and regulatory requirements.

(三) 特殊情况处理

(III) Response to special circumstances

如委外催收机构反馈在催收过程中得知客户遇自然灾害（如：地震、洪水等）、公共卫生事件及社会安全事件等突发事件，本行将根据实际情况，及时调整委外催收策略，采取差异化的应对举措。

If the outsourcing agency reports that the customer has encountered emergencies during debt collection, such as natural disasters (e.g., earthquakes, floods), public health events, or social security incidents, the Bank promptly adjusts its outsourced debt collection strategies based on the specific circumstances and implements differentiated response measures.

三、消费者权益保护

III. Protection of Consumer Rights and Interests

本行重视债务催收中的消费者权益保护工作，确保催收工作合法合规有序进行。

The Bank prioritizes consumer financial protection during debt collection, ensuring compliance with legal and regulatory requirements.

(一) 保护消费者知情权

(I) Protecting consumers' right to information

本行已在官方渠道统一公开委外催收机构名称、联系方式、投诉渠道等有关信息，并要求委外催收机构实施催收时，主动表明身份及意图，遵守基本礼仪。

The Bank has disclosed on its official channels information on all outsourcing debt collection agencies such the names, contact details, and complaint channels, and these agencies are required to proactively state their identity and purpose during collection activities and to maintain professional courtesy.

(二) 保护消费者安宁权和受尊重权

(II) Protecting consumers' right to be free from harassment and right to respect

本行要求委外催收机构规范有序开展催收流程，合理控制催收时间、频次；未经债务人同意，国家法定节假日全天禁止电话催收、外访催收。不得对与债务无关的第三人进行催收，且不得向第三人透露债务人信息。严禁采取暴力、恐吓、冒用国家机关名义等监管规定禁止的方式进行催收。

The Bank requires outsourcing debt collection agencies to conduct collection procedures in a standardized and orderly manner, reasonably controlling the timing and frequency of collection activities. Telephone or on-site collection activities are prohibited during national public holidays without the debtor's prior consent. Collection activities must not be directed at third parties unrelated to the debt, and no debtor information shall be

disclosed to third parties. Collection through violence, intimidation, misrepresentation of government authority, or other methods explicitly banned by regulators is strictly prohibited.

(三) 保护消费者信息安全权

(III) Protecting consumers' right to information security

本行严格按照个人信息保护相关规定处理消费者个人信息，规范与委外催收机构间的信息传输行为，按照“最小必要”原则确定委外催收机构留存客户信息范围，严格要求委外催收机构保护客户信息安全，切实保护消费者信息安全权。客户的资料文件及债务人个人信息不得对外公布、泄露、交换、出售或允许他人使用，更不能利用相关保密信息进行任何商业活动。

The Bank strictly complies with applicable regulations on personal information protection to handle consumers' personal information. The transmission of information with outsourcing debt collection agencies is regulated, with the scope of customer information retained by these agencies limited to “minimum necessity”. The Bank rigorously requires outsourcing debt collection agencies to safeguard the security of customer information, ensuring the protection of consumers' right to information security. Customers' documents and debtors' personal information must not be disclosed, leaked, exchanged, sold, or made available to third parties for use, nor may they be utilized for any commercial activities exploiting such confidential

information.

(四) 持续加强委外催收管理

(IV) Continuously enhancing management of outsourced debt collection operations

制定批量外包催收管理办法，明确催收机构准入退出标准，严格把控合作催收机构准入，并明确批量外包催收管理要求，强化批量外包催收过程管理和监督考核。本行已自建委外催收系统，委外催收机构均在催收系统中进行作业，持续强化个人信息的保护。

The Bank has formulated debt collection management measures, which clearly define the standards for onboarding and offboarding bulk outsourcing debt collection agencies, strictly controlling the hiring of third-party agencies, and specify the requirements for bulk outsourcing debt collection management, to strengthen process management and supervision and assessment throughout the bulk outsourcing debt collection process. Additionally, the Bank has developed an in-house system for outsourced debt collection operations, and ensures all outsourcing collection agencies operate within this system, to continuously enhance the protection of personal information.

(五) 优化线上投诉处理工作

(V) Optimizing online complaint handling processes

合作互联网平台应当建立催收及委外催收投诉管理机制，明确消费者投诉登记、调查、处理、报告等事项的管

理流程、负责部门和处理期限，确保对消费者投诉及时进行调查处理。要确保负责投诉处理的部门和人员与被投诉事件的相对独立性，建立检查、监督、考核体系。

Cooperating internet platforms shall establish complaint management mechanisms for debt collection and outsourced debt collection activities, clearly define management procedures, responsible departments, and processing deadlines for consumer complaint registration, investigation, resolution, and reporting to ensure timely investigation and handling of consumer complaints. The departments and personnel responsible for handling complaints must maintain relative independence from the matters under investigation, and inspection, supervision, and evaluation systems shall be established accordingly.

四、培训要求

IV. Training Requirements

本行定期开展催收相关专业人员日常业务培训，对个贷及信用卡贷后催收相关员工开展最新的政策制度、催收系统新功能赋能、协商还款等业务培训。定期开展内部催收团队相关员工业务能力与合规意识专项培训，内容涵盖法律法规、客户权益保护要求、沟通规范及风险防控要点，切实增强一线人员的履职能力与合规自觉。同时依据监管政策及内部管理要求，对委外催收机构实施明确的催收管理细则，通过定期开展合规培训、质检及现场稽核等方式，持续传导合规理念，强化过程管控，确保委外催收行为依

法依规、规范有序。通过双线并行、内外结合的培训模式，不断提升员工的专业能力，保障全行债务催收工作的合规性与可持续性。

The Bank conducts regular professional training for debt collection-related personnel, including providing the latest policy and regulation updates, introducing new system functionality enhancements, and sharing negotiated repayment practices for employees involved in post-lending debt collection for personal loans and credit card loans. Specialized training sessions focused on business capabilities and compliance awareness are conducted regularly for internal collection teams, covering key areas such as laws and regulations, consumer rights protection requirements, communication protocols, and risk prevention strategies, to enhance frontline employees' professional competence and compliance awareness. In parallel, based on regulatory policies and internal management requirements, the Bank implements clear collection management guidelines for outsourcing agencies, and conducts regular training, quality inspections, and on-site examinations, to continuously reinforce compliance principles and strengthen process control, ensuring lawful, regulated, and orderly collection practices. Through the dual-track model integrating internal and external training, the Bank consistently improves employee expertise to safeguard the compliance and sustainability of its overall debt collection operations.

五、检视与更新

V. Review and Update

本行将根据国家政策、监管要求、行业发展和内部管理需要，适时对本制度进行检视和更新。

Bank of Nanjing will periodically review and update the policy in accordance with national policies, regulatory requirements, industry development and internal operational needs.