Driven by AI, big data, and machine learning, digital innovation has become a strategic necessity for Hong Kong banks striving to modernise systems, boost efficiency, and defend market share. The banking sector in Hong Kong is at a pivotal juncture, facing a myriad of challenges and opportunities.

在人工智能、大數據和機器 學習的推動下,追求數碼創 新已經成為香港銀行現代化 系列、提升效率和捍衛市場 佔有率的必要策略。香港銀 行界正處於關鍵時刻,面對 無數挑戰與機遇。

02



without interrupting daily operations, all while navigating escalating cybersecurity risks, tightening regulatory requirements, and mounting pressure to deliver flawless digital experiences to increasingly tech-savvy customers.

These ambitions are unfolding within a policy environment that is actively shaping the pace and direction of innovation. The Hong Kong government, through initiatives such as Fintech 2025^[1] and the Open API Framework^[2], is seeking to reinforce the city's role as both a global financial hub and a regional technology leader. This intersection between regulatory intent and institutional strategy raises both the stakes and the expectations for banks in Hong Kong. Against this backdrop of government-driven reform, changing customer expectations, and growing pressure from digital challengers, Hong Kong banks are being forced to rethink how they tackle digital innovation.

Strategy under pressure: innovate to thrive

With Hong Kong's banking sector projected to spend USD1.5 billion on IT in 2025 as per market estimates^[3], digital innovation has morphed from a technology upgrade to a key capital allocation decision. For banks undertaking digital transformation projects, the question is not simply what technology to implement, but what specific problems are being solved, and whether teams have the skills to deliver. In a market where customers can switch with a swipe and regulators scrutinise digital resilience, strategy must lead, not follow, the tech roadmap.

國最近通過的《指導與建立美國穩定幣國家創新法案》清楚提醒 我們,金融機構所面臨的規管環境正快速變化。這項挑戰具有多 重層面:要採用尖端科技,與數十年歷史的舊有系統無縫結合, 且不影響日常運作;同時要應對日漸嚴峻的網絡安全風險、日益嚴謹的法 規要求;加上客戶科技素養提升,為客戶提供完美數碼體驗的壓力日增。

金融機構努力追求這些目標,而政策環境正左右創新的步伐和方向。透過「金融科技2025」策略^[1]和開放應用程式介面框架^[2]等措施,香港政府正致力鞏固香港作為全球金融中心和區域科技領袖的地位。法規的導向,加上機構的策略,使數碼創新對香港銀行來說日形重要,各方對銀行的期望也有所提高。面對政府推動改革、客戶期望轉變、數碼挑戰者的壓力越來越大,香港銀行不得不重新思考數碼創新策略。

壓力下的策略:創新求存

市場估計,香港銀行界2025年預計將在資訊科技方面投資15億美元[3];數碼創新已由技術升級演變為主要的資金分配決策。對於從事數碼轉型項目的銀行來說,重點不止限於採用什麼技術,更要考慮要解決什麼具體問題,以及團隊是否具備相關技能。今天的市場上,客戶可以瞬間轉向其他銀行,監管機構又密切審查銀行的數碼應變能力,銀行的策略必須引領建立科技路線圖,而非隨波逐流。

he recent passage of the GENIUS Act in the US serves as a stark reminder of the dynamic regulatory landscape that financial institutions must navigate. The challenge is multifaceted: seamlessly integrating cutting-edge technologies into decades-old legacy systems

03



A path to the technology roadmap?

For chief information and operations officers, the brief is complex: modernise without destabilising and innovate without overspending. Yet, despite sustained investments, many banks report little digital progress. This is where a well-structured technology roadmap becomes essential. Whether layering new application programming interfaces onto legacy systems or introducing microservices on dedicated platforms, the roadmap helps align tech choices with business objectives. Before initiating this process, banks should set forth their priorities across metrics such as relevance, ease of use, security, deployment speed, scalability, and measurable return on investment to ensure each step delivers tangible value.

A "Go-To-Market" roadmap

More by necessity than by choice, banks are increasingly adopting modular transformation as they layer new capabilities over existing systems to bring innovations to market. By segmenting target groups and crafting tailored messaging across optimal channels, banks can better bring new solutions to market. Once key milestones are met, a mix of push and pull tactics can be deployed to drive adoption

如何擘畫科技路線圖?

資訊總監和營運總監的工作很複雜,要追求現代化而又不影響穩定運作,要實現創新而避免過量花費。然而,雖然持續投資,許多銀行在數碼技術方面依然難有寸進。因此有系統的科技路線圖顯得至關重要。不論是在舊有系統中加入新的應用程式介面,還是在專用平台上推出微服務,路線圖均有助以適當的技術配合業務目標。在展開數碼創新過程前,銀行應考慮相關性、易用性、安全程度、可否迅速投入使用、擴展性及可量度的投資回報等指標,訂定工作優次,確保每一步都能帶來實質可見的價值。

市場推進藍圖

因應實際需要,越來越多銀行採用模組化轉型策略,在現有系統上加添新功能,推出創新產品和服務。藉着把目標群組分類,透過最佳途徑傳達切合客戶需要的訊息,銀行便能把新方案更有效地推出市場。達到主要發展目標後,便可運用配合得宜的推動和拉引策略,促使目標市場客群使用新產品和服務。制訂「入市路線圖」的最佳做法包括:

Driving customer adoption of technology: The real test of success

Banks continue to invest heavily in selecting and implementing digital solutions, but the real challenge lies in customer adoption. Success depends not just on the quality of the technology, it also depends on whether the right customers embrace it at scale. That begins with a clear segmentation of the intended users—defined by factors such as business size, operational complexity, or digital maturity. From there, banks must take a structured approach to engagement, combining awareness-building, education, and support. Adoption strategies should blend both push and pull levers, including incentives, tailored onboarding, and partnerships with Fintechs that can enhance credibility and extend reach.

促使更多客戶採用科技: 成功與否的真正考驗

銀行持續大量投資於選擇和實施數碼方案,但真正的挑戰在於有多少客戶採用方案。成功與否不僅視乎技術本身的優越性,更視乎目標客戶是否廣泛接受。因此首要工作是清楚界定目標用戶群,按客戶的業務規模、運作複雜程度或數碼成熟程度分類。然後是有系統地接觸客戶,讓客戶認識數碼方案,提供教育及支援服務。促使更多客戶採用時,應推動和拉引策略兼備,包括提供獎勵、量身定制的培訓及引導服務,以及與金融科技公司合作,以提升可信度,擴大客戶層面。

among these segments. In this context, best practices involved in the development of a "Go-To-Market" roadmap include:

- 1. Perform an in-depth operational assessment
- 2. Enlist stakeholders proactively
- 3. Review regulatory and governance requirements
- 4. Decide whether to build, buy, or partner
- 5. Upskill your staff
- 6. Implement the solution
- 7. Drive adoption
- 8. Evaluate and scale

This approach allows banks to minimise operational risk while accelerating time-to-market, enhancing customer relevance, and capturing innovation gains without compromising core stability.

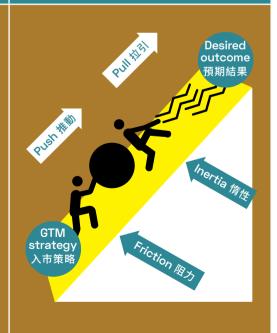
- 1. 深入評估業務運作
- 2. 主動接觸持份者
- 3. 審視監管及管治要求
- 4. 決定自行構建、購買現成產品,或與其他 機構合作
- 5. 提升員工技能
- 6. 實施方案
- 7. 促使更多客戶採用
- 8. 評估效果,擴展規模

這做法讓銀行降低營運風險,同時加速進入市場、增加在客戶心中的重要性、把握創新的好處,而又不影響核心業務的穩定性。

3-Step customer adoption GTM strategy 入市策略三步曲

- 1. Identify the target group and divide them into segments 界定目標群組,予以分類
- 2. Set adoption milestone for target group 訂立目標群組採用數碼方案的目標
- 3. Drive adoption:
 Push and pull tactics
 促使更多客戶採用推動和
 拉引策略

- Understand your customer profile
 了解客戶狀況
- Segragate customers based on their profile, size, behaviour pattern, etc.
 按客戶狀況、規模大小、行為模式等分門別類
- Based on customer profiling 按客戶狀況訂立目標
- Based on internal timelines as per bank's digital stratgy
 按銀行數碼策略的內部時間表訂立目標
- Based on resources available
 按可用資源訂立目標



Hong Kong's digital innovation landscape

As Hong Kong strives to maintain its status as a global financial centre and elevate technology as a key growth pillar, enabling legislation is empowering banks to accelerate innovation just as customer expectations are changing.

The rise and rise of digital banking

Building on its Tech Baseline Assessment under the Fintech 2025 strategy, the Hong Kong Monetary Authority (HKMA) launched the FiNETech series ^[4], bringing together more than 100 banks, securities firms, insurers, and technology companies to explore next-level collaboration in areas such as Wealthtech, Insurtech, Greentech, AI, and Distributed Ledger Technology. At the same time, new licensing regimes are being introduced for over-the-counter trading in virtual assets and custody services^[5] and stablecoin issuance^[6].

As this regulatory momentum attracts new entrants, traditional banks are adapting quickly. Beyond aggressively exploring these emerging areas, incumbents have invested heavily in digitising their customer experience, leveraging their embedded trust, cross-product relationships, and regulatory scale to launch mobile-native platforms, integrate chatbots, and roll out data-driven personalisation to stay ahead of the competition.

Digital natives take centre stage

Previous digitisation efforts in Hong Kong's banking sector were often top-down initiatives, typically driven by internal priorities such as regulatory compliance, cost reduction, and operational efficiency. However, the current wave of digital transformation is increasingly customer-driven, propelled by changing demographics and evolving consumer behaviours.

For banks undertaking digital transformation projects, the question is not simply what technology to implement, but what specific problems are being solved, and whether teams

have the skills to deliver.

香港的數碼創新現況

香港致力維持全球金融中心的地位,把科技提升為主要增長支柱。相關的賦權法例讓銀行得以加速創新,客戶期望也有所轉變。

數碼銀行的崛起

香港金融管理局(金管局)參照「金融科技2025」策略下的金融科技應用評估結果,推出FiNETech系列^[4],匯集超過100家銀行、證券公司、保險公司以及科技企業,共同發掘在財富科技、保險科技、綠色科技、人工智能和分布式分類帳技術的深化合作。同時,政府正設立虛擬資產場外交易及託管服務^[5]以及穩定幣發行的新發牌制度^[6]。

這些法規發展吸引新參與者加入市場,傳統銀行也迅速調整策略。除了積極探索這些新興業務範疇外,銀行也大力投資於客戶體驗數碼化,善用與客戶已然建立的信任、跨產品關係和監管規模優勢,推出以流動設備為基礎的平台、結合聊天機械人技術、推出數據驅動的個人化服務等,力求在競爭中保持領先地位。

數位原生世代成為焦點

香港銀行過往的數碼化工作,往往是由上層主導,一般是為了達到合規要求、減省成本和運營效率等內部目標。然而,現今的數碼轉型浪



Digitally native small and medium-sized enterprises (SMEs) and Gen Z consumers are emerging as critical market segments with very different banking expectations. According to the HKMA's Fintech 2025 strategy, these groups prioritise convenience, seamless mobile experiences, and personalised services over loyalty to legacy brands. An Ipsos survey found that two-thirds of Hong Kong's Gen Z and Millennials bank exclusively online^[7]. They are also more willing to experiment with cryptocurrencies and alternative financial products than older generations. Meanwhile, SMEs increasingly demand integrated digital solutions that simplify payments, financing, and cash flow management while lowering costs^[8].

This demographic shift is forcing banks to pivot from purely internal digital optimisation toward customer-centric innovations, especially since digital engagement correlates strongly with customer retention among younger users who demonstrate notably lower loyalty to traditional financial institutions according to an Edelman report^[9].

An evolving regulatory landscape

Hong Kong's regulatory environment is also evolving. The HKMA has actively promoted innovation through initiatives such as its Fintech Supervisory Sandbox, the Open API Framework, and sustained support for Regtech adoption. While these efforts accelerate experimentation and integration, they also introduce new layers of complexity, forcing banks to align digital innovation with compliance frameworks that are themselves in flux.

潮日益由客戶驅動,背後推動力來自人口結構的變化與消費者行為的不斷演進。

數位原生的中小型企業,以及 Z 世代消費者,逐漸成為關鍵的市場組別,他們對銀行服務的期望有別於傳統客戶。金管局的「金融科技 2025」策略顯示,這些群組追求方便、無縫的流動設備體驗,以及個人化服務,不會忠於傳統品牌。Ipsos的一項調查顯示,香港的 Z 世代和千禧世代中,有三分之二只使用網上銀行服務^[7];與較年長的世代相比,他們也較願意嘗試投資於虛擬貨幣和另類金融產品。同時,中小企對綜合數碼方案的需求日增,希望利用這些方案簡化付款程序、方便融資和管理現金流,並減省成本^[8]。

這個人口結構的轉變,驅使銀行從單純優化內部數碼應用,轉而探索以客為本的創新;這是因為數碼體驗與留住年輕客戶密切相關。根據Edelman的一份報告顯示,年輕人對傳統金融機構的忠誠度顯著較低¹⁹。

監管環境的轉變

香港的監管環境也在轉變中。金管局一直透過 金融科技監管沙盒、開放應用程式框架、持續 支持合規科技等措施,積極推動創新。這些努 力加快了試驗和整合的步伐,同時也增添了新 的複雜性,促使銀行要在數碼創新方面配合合 規框架,而框架本身也在不斷變化。



6

對於從事數碼轉型項目的 銀行來說,重點不止限於 採用什麼技術,更要考慮要 解決什麼具體問題,以及 團隊是否具備相關技能。

07

Layering innovation into legacy systems

Hong Kong banks have made significant investments in core systems that support compliance, risk management and global operations, making a full "rip and replace" approach both impractical and risky. These systems are deeply integrated and often tied to regional and international setups, so banks seek to upgrade, not overhaul their tech stacks.

Digitisation strategies

To layer new capabilities over legacy systems, banks have been adopting modular approaches:

- 1. API gateways and orchestration layers: Since 2019, over 500 open APIs have been deployed under the HKMA's phased Open API initiative^[10], enabling 20 banks to share product data and onboard customers more efficiently.
- 2. Containerised microservices: Independent microservices are used for high-frequency tasks such as identity verification and real-time payments over faster payment services, allowing banks to innovate rapidly across a range of popular services.
- **3. Data virtualisation:** Banks are unifying fragmented data siloes across trade, retail, and corporate without a full-scale migration, allowing front-end analytics and AI tools to access live data.

By incrementally layering digital components, banking and financial institutions ensure that they remain resilient and compliant while adapting to customer demands and regulatory requirements.

The talent equation

This layered approach requires hybrid talent, and demand is surging for professionals who can navigate legacy systems while working fluently with cloud-native architectures and AI tools. According to a Hong Kong University of Science and Technology report, 44% of traditional banks face challenges in recruiting personnel with AI skills, underscoring a critical gap^[11]. Dual-skilled teams are now essential to integrate vendor platforms, manage API pipelines, and support rapid deployment across business lines.

To build, buy, or partner? That is the question!

Hong Kong banks face a familiar strategic crossroads as they assess their internal capabilities, regulatory obligations, and market objectives: whether to build proprietary systems, buy off-the-shelf technologies, or partner with Fintech and

在舊有系統中加入創新

香港銀行投入了大量資金建立核心系統,支援 合規、風險管理和環球業務運作;要是完全推 倒重來,旣不切實際,風險也很高。這些系統與 區域及國際體系緊密結合,因此銀行傾向把科 技系統升級,而非全面改造這些系統。

數碼化策略

銀行一向採用模組化方式,在舊有系統中加入新功能:

- 1. 應用程式介面閘道及協調層:在金管局分階段實施的開放應用程式介面框架下,自2019年起,已提供超過500個開放應用程式介面[10],供20間銀行分享產品資訊,並更有效率地接收新客戶。
- 2. 容器化微服務:使用獨立的微服務處理重 複性任務,例如核實身分、透過快速支付 服務進行實時支付等,讓銀行可在多種常 用服務中迅速實現創新。
- 3. 數據虛擬化:銀行不經全面數據遷移的程序,把貿易、零售、機構客戶等分散的數據整合起來,讓前端的分析和人工智能工具存取實時數據。

透過逐步加入數碼內容,銀行及金融機構便可保持靈活合規,同時能配合客戶需要和監管要求。

人才方程式

這個漸進方式要求人才具備多元技能, 旣熟悉傳統系統, 面對雲原生架構和人工智能工具時又能應用自如。業界對於這類專業人士的需求急增。香港科技大學的一分報告指出, 44%傳統銀行面臨招聘具備人工智能技能人才的困難, 凸顯此關鍵人才缺口[11]。具備雙重技能的團隊尤為重要, 他們負責整合供應商平台、管理應用程式介面流水線, 並支援在不同業務範疇迅速應用數碼方案。

自行開發、購買現成解決方案,還是與 其他機構合作?那是問題所在!

香港銀行評估內部能力、合規責任和市場目標時,都面臨類似的策略抉擇:自行開發專有系統、購買現成的技術,又或與金融科技和合規科技公司合作。這決定不僅取決於能力及競爭定位,也必須考量在亞洲最受嚴謹監管、數據

Regtech firms. The decision is shaped not only by capability and competitive positioning but also by the demands of operating within one of Asia's most tightly-regulated and data-sensitive financial environments, while increasingly navigating integration with the Guangdong-Hong Kong-Macao Greater Bay Area and Mainland China's evolving digital finance infrastructure.

- Build: Institutions with long-standing proprietary advantages in specific segments — such as FX trading or credit underwriting — often choose to develop solutions in-house to maintain competitive edge and control over performance, an important consideration in Hong Kong, where strict data privacy laws, HKMA requirements, and cross-border compliance needs generally favour internal control.
- Buy: Off-the-shelf cloud-based solutions, particularly for CRM, compliance, and onboarding, have matured and are often preconfigured to meet local regulatory standards. For many banks, buying enables rapid deployment while ensuring alignment with HKMA expectations and emerging regional standards.
- Partner: Collaborating with Fintech and Regtech firms
 can fast-track innovation, especially in areas like digital
 onboarding, fraud detection and KYC automation. However,
 under Hong Kong's regulatory scrutiny, these partnerships
 require robust governance, strict oversight of data sharing,
 and integration flexibility to manage third-party risk.

Instead of committing to a single approach, many banks in Hong Kong are developing technological ecosystems composed of interchangeable, best-in-class components. The challenge is to deliver fast, without falling into vendor lock-in, while ensuring systems remain adaptable and future-ready.

最敏感的金融環境中經營時面對的要求,以及 應對與粵港澳大灣區和內地數字金融基建日 益緊密融合的挑戰。

- **自行開發:**有些機構在某些業務環節(例如外幣買賣或信貸審批)有專有優勢,它們往往選擇自行開發方案,以維持競爭優勢,掌控這些業務的表現。香港有嚴謹的私隱法、金管局要求和跨境合規的需要,整體注重內部管控,因此這是重要的考慮因素。
- 購買現成解決方案: 現成的雲端方案, 特別是有關客戶關係管理、合規和與客戶建立業務關係等的方案, 都已經很成熟, 而且設計時往往已經能符合本地的監管規定。對於很多銀行來說, 購買現成產品, 可以迅速投入使用, 而又能符合金管局期望和最新的區域標準。
- 與其他機構合作:與金融科技和合規科技機構合作,可加快創新速度,特別是以數碼方式與客戶建立業務關係、偵測欺詐行為、客戶盡職審查程序自動化等方面。然而,香港的監管環境要求這些合作關係建立健全的管治、嚴謹監督數據的分享,並且可以靈活整合,以管理第三方風險。

香港許多銀行都不只採用一種做法,而是以最好的、可以互換的組成部分,構成技術生態系統。挑戰在於能快速投入運作,而又不被供應商鎖定,同時確保系統能適應新變化,應付未來的需要。

Build	Buy	Partner
自行開發	購買現成解決方案	與其他機構合作

Thriving in the age of AI

As digital infrastructure expands, the challenges facing Hong Kong banks are intensifying. Al, cloud adoption, open APIs, and real-time data layers — essential for agility and innovation — also create new vectors for cyber threats.

AI: Risk or opportunity?

The emergence of AI is reshaping businesses at a fundamental level. According to the 2025 C-Suite Survey from the Thomson Reuters Institute, 85% of 200 executives across eight countries believe AI will significantly impact their organisations over the next five years. Notably, digital transformation and AI implementation now rank higher than revenue growth or cost reduction as top strategic priorities. While the excitement around generative AI is widespread, its ability to deliver real value depends on how well it is integrated into broader organisational goals. The survey also highlights that executives see AI as a tool to automate routine tasks, improve efficiency, save time, reduce costs, and enhance quality. However, concerns persist, particularly around accuracy, reliability, algorithmic bias, and the need for both a human touch and oversight^[12].

With less than three years since the arrival of generative AI, many practitioners have yet to form a firm view on its long-term impact. For example, generative AI's effect on jobs, risk, and revenues remain uncertain, especially in highly regulated sectors like banking. "There is a blind faith that ChatGPT is always correct, and it isn't. People need to understand that they will still need a legally trained human brain to assess documents," says one of the respondents of the survey^[13]. The consensus? Learn to use it, if only to better appreciate both its potential and inherent limitations.

More by necessity than by choice, banks are increasingly adopting modular transformation as they layer new capabilities over existing systems to bring innovations to market.



在人工智能世代繼續經營

香港銀行的數碼基建持續擴充,面對的挑戰也 越來越大。人工智能、使用雲端、開放應用程式 介面、實時數據層等,都是保持靈活創新的必 備元素,但也讓網絡威脅有了新切入點。

人工智能:風險還是機遇?

人工智能的發展,在根本本層面影響着商業社會。湯森路透研究所的2025年最高管理層調查顯示,來自八個國家的200名受訪行政人員當中,有85%相信人工智能會在未來五年對其機構產生重要影響。特別值得注意的是,數碼轉型和採用人工智能成為最重要的策略,超越了收益增長或減省成本。生成式人工智引起廣寬機構的整體目標有效整合。調查結果也指出,行政人員認為人工智能是個工具,可把例行工作自動化、提升效率、節省時間、降低成本、提高質量。然而,受訪者對人工智能的應用仍有憂慮,包括它是否準確可靠、演算法是否有偏差,以及需要人性化和由人監督[12]。

生成式人工智能面世不足三年,人們對它的長遠影響仍未有確實看法,例如它對工作、風險和收益的影響仍未可知,特別是在銀行這一類受嚴格監管的界別。調查的一名受訪者指出:「有人盲目相信ChatGPT永遠正確,其實不然。人們要明白,他們還需要有受過法律訓練的人去審核文件。」[13]業界共識是要善用人工智能,既認識其潛力,也明白其限制。

總體而言,香港銀行業的環境不斷改變,旣有 挑戰又有機遇。金融機構須應對法規的改變、 科技的進步和客戶轉變中的期望,創新和適應



In conclusion, the evolving landscape of the banking sector in Hong Kong presents both challenges and opportunities. As financial institutions navigate regulatory changes, technological advancements, and shifting customer expectations, the need for innovation and adaptability has never been more critical. The insights shared in this article underscore the importance of strategic foresight and proactive measures in ensuring sustainable growth and resilience.

As we look to the future, one question remains: How will Hong Kong's banking industry continue to transform in response to the dynamic global financial environment, and what role will each stakeholder play in shaping this future? BT

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能力必不可少。本文分享的見解,突顯策略上的前瞻性十分重要,業界必須主動採取措施,確保持續發展,靈活應變。

展望未來,香港銀行業會如何繼續轉型以回應 瞬息萬變的環球金融環境,及每位持份者如何 發揮作用,仍是業界需探索的重要課題。 **BII**

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ABOUT THE AUTHORS 作 者 簡



Harsh JOGANI Regional Head APAC & MENA Thomson Reuters Confirmation

介



Tony VENTURA
Regional Director
APJ
Thomson Reuters Confirmation