



The Bank of East Asia, Limited

東亞銀行有限公司

(Incorporated in Hong Kong with limited liability in 1918)
(Stock Code: 23)

HUMAN RIGHTS POLICY

(reviewed and approved on 20 November 2025)

1. Introduction

We at The Bank of East Asia, Limited and its group members (collectively "BEA" or the "Group") recognise the crucial role that financial institutions play in the economic development of society. We also recognise that our financial success is inextricably linked to the health of the community and environment in which we operate. The Group's stakeholders, who are impacted by our business and operations, include but are not limited to our customers, investors, employees, and suppliers. Our responsibility to our stakeholders extends beyond the provision of the financial services we offer.

2. Approach

- 2.1 According to the Office of the United Nations High Commissioner for Human Rights¹, human rights are inherent to all human beings regardless of nationality, place of residence, sex, national or ethnic origin, colour, religion, language, or any other status. People are all equally entitled to human rights without discrimination. These rights are interrelated, interdependent, and indivisible.
- 2.2 The Group's corporate responsibility commitments are aligned with the United Nations Guiding Principles on Business and Human Rights. BEA believes that it has a responsibility to respect human rights, which is independent from the government's duty to protect such rights. We uphold our responsibility through compliance with laws and regulations as well as corporate governance including strict adherence to BEA's policies.
- 2.3 BEA is guided by the United Nations International Bill of Human Rights including the United Nations Universal Declaration of Human Rights as well as the fundamental conventions of the International Labour Organisation.
- 2.4 BEA's *Human Rights Policy* applies to the Group's operations and business activities worldwide including our value chain. While laws and regulations may differ in countries and regions in which the Group operates, we aim to adopt higher standards where possible.
- 2.5 BEA has identified a number of salient human rights issues based on its business and the potential and actual negative human rights impacts that said business may have on people. We prohibit discrimination, human trafficking, child labour, and forced and compulsory labour while we support privacy, labour rights, land rights, indigenous people's rights, as well as diversity and inclusion. Our stance on these human rights issues

¹ See <https://www.ohchr.org/en/what-are-human-rights>, The Office of the High Commissioner for Human Rights of the United Nations.

applies to the relationships we share with our employees, customers, suppliers, community partners, and other stakeholders, and the activities we undertake with them.

- 2.6 We are committed to monitoring industry-specific human rights issues including the right to privacy, and we have implemented programmes to address them. In the event that a human rights incident is identified in our value chain, the Group will endeavour to address the negative impacts through investigation and/or corrective action.
- 2.7 Non-discrimination is a cross-cutting principle in international human rights law and is present in all the major human rights treaties. Such principle applies to everyone in relation to all human rights and freedoms and prohibits discrimination on the basis of a list of non-exhaustive categories such as sex, race, and colour.

3. Employees

3.1 Our Core Values and Respect for Employees' Human Rights

We focus on our core values, namely excellence, commitment, integrity, customer focus, teamwork, and innovation. We expect a high behavioural standard from all of our employees.

We uphold the values and principles of the United Nations Universal Declaration of Human Rights and the fundamental conventions of the International Labour Organisation. We have established and maintained various codes, policies, procedures, and guidelines at the Group that are supportive of equality, diversity, and inclusion with respect to our staff. Our employees are made aware of their employment rights through a variety of channels including employment contracts, our *Staff Handbook*, *Code of Conduct*, orientation and induction programmes, and e-Learning, which includes an annual refresher course on the *Code of Conduct*.

3.2 Fostering a Culture of Equality, Diversity, and Inclusion

We are committed to fostering a diverse and inclusive culture in which our employees can work without being subjected to any bias, unlawful discrimination, harassment, bullying, victimisation, or vilification based on employees' age, gender, sexual orientation, religion, national and ethnic origin, physical or mental disability or medical condition as defined under applicable law, as well as family, marital, pregnancy and socioeconomic status, and rank and role.

BEA's *Equal Employment Opportunity, Diversity, and Inclusion Policy* outlines our commitment to fostering and promoting a positive working culture characterised by fairness, equality, opportunity, and respect for

socially and culturally diverse employees from all backgrounds so that they can realise their full potential.

3.3 Freedom from Discrimination

BEA prohibits discrimination and harassment of its employees in all forms regardless of whether individual protections are legally mandated in the different regions or countries in which we operate. We ensure that employees adhere to our expectations to eliminate and prevent discrimination and harassment on their part to respect individual human rights.

We provide equal employment opportunities in all aspects of the employment relationship, including recruitment, assignment of tasks, transfer/secondment, performance management, training and career development, talent management, working conditions, staff compensation and benefits, grievances and complaint handling.

We treat our employees in good faith and are committed to making decisions on such matters without bias. We comply with the spirit of all applicable ordinances in Hong Kong, as well as in other countries and local jurisdictions in which we operate and conduct business and make reference to the international standards regarding fair employment practices and non-discrimination.

We respect the diverse skills/abilities, knowledge, working experience, professional and educational backgrounds, and perspectives of our employees, and we assess the performance of our employees based on their ability and behaviour at work.

3.4 Employee Rights to Privacy

We respect and are committed to protecting the privacy of personal data according to the Personal Data (Privacy) Ordinance, which is enforced by the Privacy Commissioner for Personal Data in Hong Kong while we respect and protect the privacy of personal data according to the laws and regulations in the other markets in which we operate. We respect employees' privacy rights by embedding protection in our internal policies and training to ensure that all employees are aware of the importance of privacy and raising any issues related to the leakage of personal or customer data, etc.

Information obtained by BEA concerning sensitive information about staff members (e.g. physical or mental disabilities or medical conditions) is kept confidential and restricted to staff members on a genuine need basis or as required by law and regulation to avoid any conscious/unconscious bias in the workplace.

4. Customers

- 4.1 In accordance with the discrimination laws of Hong Kong and BEA's *Sustainability Policy*², we will not refuse to provide products, services, or facilities to a person on the basis of race, which refers to the race, colour, descent, national origin or ethnic origin of a person, gender (including gender identity, gender expression, and gender stereotyping), religion, family and marital status, sexual orientation and/or physical ability.
- 4.2 BEA respects human rights in data management and we are committed to protecting the privacy of customers' personal data according to the laws and regulations in the markets in which we operate, including the Personal Data (Privacy) Ordinance, which is enforced by the Privacy Commissioner for Personal Data in Hong Kong.
- 4.3 Through our lending policies, we help uphold the integrity of the financial system and manage our possible impact on the community. Our ESG assessment criteria ensures that due diligence based on environmental and social criteria (including evidence of child labour and impacts on cultural heritage and communities of indigenous people) is conducted before financing is extended. In the event that the Group has determined the potential for human rights impacts exists in a client's operations and supply chain, BEA requires proper justification and risk mitigation.

5. Suppliers

- 5.1 BEA aims to drive improved performance by incorporating and embedding corporate responsibility practices and concerns into our supply chain management processes. The Group prohibits slavery and human trafficking in its business activities, operations, and supply chain. All suppliers must acknowledge BEA's *Supplier Code of Conduct*³ ("SCoC"), which stipulates BEA's requirements in regard to social and ethical standards of conduct as well as conditions of employment including health & safety, wages, working hours, discrimination, harassment, and courses for discussion and recourse.
- 5.2 BEA is committed to working with suppliers that showcase best practices, while encouraging others to develop and demonstrate improvement within these fields. We have in place a procedure to identify and report suppliers who do not confirm compliance with our SCoC. Where circumstances warrant, we have in place in our procurement policy and procedures to guide appropriate actions to suspend engagement with suppliers in breach of our human rights commitments and/or other SCoC requirements.

^{2,3} <https://www.hkbea.com/html/tc/bea-about-bea-sustainability-policies-statements-codes.html>

6. Community Partners

- 6.1 BEA is committed to partnering with non-governmental organisations ("NGOs") and charitable organisations that uphold human rights laws and standards. All community partners are required to adhere to BEA's Human Rights Policy, which strictly prohibits forced labour, human trafficking, unsafe working conditions, discrimination, harassment, and child labour. Partners are also expected to comply with all applicable laws and international human rights standards to the greatest extent possible.

7. Grievance and Whistleblowing Channels

- 7.1 If employees reasonably believe in good faith that they are victims of any kind of discrimination or harassment by any persons or witness other staff members committing said acts, they are encouraged to report and disclose information about such incidents as they reasonably consider necessary in accordance with BEA's *Staff Grievance Procedures*.
- 7.2 If employees reasonably believe that fraud, deception, theft, forgery, bribery and corruption, dishonesty, financial reporting improprieties, or any illegal, unethical, unsafe, unusual, and questionable activities/practices are being perpetrated or have been carried out; or reasonably believe that other staff members are knowingly violating the policies and/or operational procedures/guidelines of the Group, they should immediately report such incidents according to BEA's *Whistleblowing Policy and Procedure*.
- 7.3 A reporting process has been established leveraging the Bank Culture Dashboard to collect data on any whistleblowing, staff grievances, misconduct, substantiated customer complaints, and regulatory breaches. Any case that contravenes the Group's Policy is reported on a quarterly basis to the Senior Management. Results of the investigation and corrective actions taken are managed by the relevant departments.
- 7.4 For customers, suppliers, community partners, and other non-employees, BEA's *Whistleblowing Policy*⁴ provides a mechanism through which external stakeholders aware of malpractice can confidentially and anonymously report concerns to the Group without fear of retaliation.
- 7.5 BEA will keep all relevant information and documents in strict confidence according to the applicable laws on the protection of personal information.

⁴ <https://www.hkbea.com/html/en/bea-corporate-governance.html>

8. Disclosure

- 8.1 This Policy is made available to the general public via BEA's website at www.hkbea.com. It is also available to staff members via the Group's internal Corporate Information Sharing Platform.
- 8.2 BEA will report on its human rights' developments and issues in its annual ESG Report, which is prepared in accordance with the requirements of Appendix C2 (Environmental, Social, and Governance Reporting Code) of the Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited as well as the Global Reporting Initiative Standards 2021.

9. Policy Review

- 9.1 This Policy shall be reviewed and approved annually by the Board of Directors and as required to ensure its relevance and effectiveness.
- 9.2 Should there be any discrepancy between the English version and the Chinese version of this Policy, the English version shall apply and prevail.

10. Feedback

Your views are important to us and we welcome any feedback you may have on our *Human Rights Policy*. Please contact us at sustainability@hkbea.com.