



The Bank of East Asia, Limited

東亞銀行有限公司

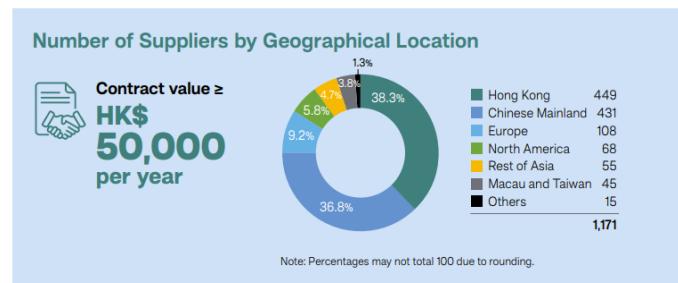
(Incorporated in Hong Kong with limited liability in 1918)
(Stock Code: 23)

Slavery and Human Trafficking Statement

1. About BEA

As a leading Hong Kong-based financial services group, The Bank of East Asia, Limited and its group members ("BEA" or the "Group") provides a comprehensive range of wholesale banking, personal banking, wealth management, and investment services through approximately 120 outlets worldwide. With a focus on supporting people and businesses with links to Hong Kong and the Chinese Mainland, we maintain one of the largest retail banking networks in Hong Kong and operate one of the most extensive networks of any foreign bank on the Chinese Mainland. In addition, we have an established presence in Macau, Taiwan, Malaysia, Singapore, the United Kingdom ("UK"), and the United States ("US").

In 2024, our Group engaged around 1,200 suppliers¹. We source most goods and services from the markets in which we operate. Given the nature of our core business as a provider of financial services, the majority of our expenditure is indirect, in other words, we source goods and services that enable us to provide financial services rather than goods for resale. There is no inherent seasonality in our Group's sourcing both in terms of the goods and services we source and the suppliers from whom we source.



2. Scope

This statement is issued in accordance with the UK Modern Slavery Act 2015, and sets out the steps that BEA has taken during the year ending 31 December 2025 to ensure that modern slavery is not knowingly taking place in our own operations or supply chains. This statement applies to all members of our Group, which includes but is not limited to The Bank of East Asia, Limited and The Bank of East Asia (China) Limited. For a list of major

¹ This figure includes all suppliers with whom BEA has entered contracts of a total value of HK\$50,000 (or equivalent) or more in 2024.

Group members, please refer to Note 37 of the Financial Statements of our 2025 Interim Report (pages 63 onwards).

3. Management Approach

BEA upholds its environmental, social, and governance ("ESG") responsibilities, and prohibits slavery and human trafficking in its business and supply chain. Aware that perpetrators of human trafficking may attempt to change the identity of their illegal proceeds so that it appears to have originated from a legitimate source, we have developed robust anti-money laundering compliance programmes to mitigate such risk. Meanwhile, the assessment of prospective corporate loan customers helps flag ESG risks including human trafficking, child labour, forced labour, and sexual exploitation.

BEA is committed to working with suppliers that showcase best practices, while encouraging others to develop and demonstrate improvement within these fields. Communal wellbeing and the integrity of the environment is important to the BEA Group, hence we seek to promote sustainable development to all those within reach of our operations. We build relationships with suppliers that share our commitment to responsible and ethical operating practices, and will not knowingly work with suppliers that have a record of negative impact on the environment or society.

Our Supplier Code of Conduct ("SCoC") outlines the Group's requirements and expectations for the social and environmental performance of suppliers. It also aligns with the values and principles of the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, and the fundamental conventions of the International Labour Organisation. We are committed to working together with suppliers on areas of weakness to improve their performance, and should they still fail to meet expectations, the Group would take steps to exit the relationship.

We are committed to our people, providing them with development opportunities and rewarding them fairly. BEA also has policies in place to address requirements in preventing slavery and human trafficking including but not limited to:

- Human Rights Policy (Section 5: Suppliers);
- Occupational Safety and Health Policy;
- Statement on Anti-money Laundering and Counter-Terrorist Financing;
- SCoC;
- Sustainability Policy (Section 5: Engaging Our Suppliers); and
- Whistleblowing Policy.

In addition, the Group has established a number of related policies that are available to staff members as internal documents including:

- Code of Conduct (Section 5: Ethical Values);

- Outsourcing Policy;
- Staff Grievance Procedure; and
- Whistleblowing Policy and Procedure.

All ESG-related policies that are part of the Group's corporate governance framework generally adhere to the same procedure of development and review. Following development by the policy owner, policies are reviewed and updated by relevant members of the ESG Work Group before they are submitted to the ESG Steering Committee for concurrence, the Board-level ESG Committee for endorsement, and then the Board for approval. All such policies are reviewed and approved as needed and at least annually.

4. Progress Update

To strengthen the sustainability of our supply chain operations, in 2025, we drafted a Sustainable Supply Chain Management framework, which will be rolled out across the Group over the next three years. This framework outlines BEA's evaluation of supplier compliance with the SCoC, which prohibits actions like ownership or control over workers that could constitute modern slavery. Looking ahead, we will review our "Centralised Procurement Policies & Procedures" to enhance procurement governance by introducing a robust ESG qualification checklist for our suppliers and refined tender evaluation scoring system to place greater weight on ESG performance. This will motivate tenderers to align with our ESG expectations of suppliers. We will also introduce ESG specifications for key product and service categories to promote sustainable procurement and elevate ESG performance across our supply chain.

BEA utilises its ESG risk assessment mechanism to evaluate supplier ESG risks and proactively looks for signs that point to the possible existence of slavery and human trafficking. For the year ended 31 December 2024, no major incidents or controversies were identified among any of the high ESG risk suppliers, and there were zero cases of human rights breaches recorded by the Group.

Recognising that due diligence requires all staff members to remain vigilant, BEA continues to provide staff with ESG training that addresses human rights and social issues including child labour. To facilitate learning and renew awareness, refresher courses are provided and in 2025, the Group required all staff members of the Group across all levels, as well as Board-level ESG Committee members to complete three hours of ESG training. This included online micro-learning on ESG fundamentals and BEA's sustainability performance.

In a similar vein, the Group continues to encourage a speak-up culture and has in place a reporting channel for staff grievances and a whistleblowing procedure enabling all stakeholders to raise concerns in confidence and anonymity via BEA's website. Our Bank Culture Dashboard captures data related to any possible human rights violations, which is reported to Senior Management throughout the year.

5. Policy Review and Approval

This Statement shall be reviewed annually and as required to ensure its relevance and effectiveness. Should there be any discrepancy between the English version and the Chinese version of this statement, the English version shall apply and prevail.

This statement was approved by the Board of Directors of The Bank of East Asia, Limited on 20 November 2025.

<i>(Signed)</i>	<i>(Signed)</i>
Adrian Li Co-Chief Executive	Brian Li Co-Chief Executive