



**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**

(established and approved on 26<sup>th</sup> November, 2020)

## 1. Introduction

We at The Bank of East Asia, Limited ("we", "BEA", or the "Bank") recognise the crucial role that financial institutions play in the economic development of society. As a Domestic Systemically Important Authorised Institution in Hong Kong<sup>1</sup>, BEA has a responsibility to help develop and protect a properly functioning financial system in Hong Kong, as well as in the other markets we serve. We also recognise that our financial success is inextricably linked to the health of the society and environment in which we operate. The Bank'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 Rights<sup>2</sup>, 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 our human rights without discrimination. These rights are interrelated, interdependent, and indivisible.
- 2.2 The Bank'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 regulatory 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 BEA Group's operations and business activities worldwide including throughout our value chain. While laws and regulations may differ in countries and regions in which the Bank operates, we will aim to adopt higher standards where possible.

---

<sup>1</sup> Hong Kong Monetary Authority, Supervisory Policy Manual, CA-B-2, Systemically Important Banks, Feb 2015.

<sup>2</sup> See <https://www.ohchr.org/EN/Issues/Pages/WhatareHumanRights.aspx>, The Office of the High Commissioner for Human Rights of the United Nations.

- 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 applies to the relationships we share with our employees, customers, suppliers, and other stakeholders, and the activities we undertake with them.
- 2.6 Non-discrimination is a cross-cutting principle in international human rights law. Such principle is present in all the major human rights treaties and applies to everyone in relation to all human rights and freedoms and it 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 Bank 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, the Staff Handbook, the 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' race, sex, gender, pregnancy, colour, religion, national origin, nationality, citizenship, age, physical or mental disability or medical condition as defined under applicable law, marital status, sexual orientation, culture, socioeconomic status, as well as rank and role.

This commitment is demonstrated in the Bank's Equal Employment Opportunity, Diversity, and Inclusion Policy. This policy documents the Bank's expectation to foster and promote 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. Respect for diversity and inclusion is a priority of

our Group including our operations in Hong Kong and our subsidiaries and branches in other markets.

### 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 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<sup>3</sup>, 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 and is 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 Bank has determined the potential for human rights impacts to exist 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 Bank prohibits slavery and human trafficking in its supply chain<sup>4</sup>. Suppliers must satisfy the Bank's requirement 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 practice, while encouraging others to develop and demonstrate improvement within these fields. Our suppliers are required to acknowledge compliance with BEA's Supplier Code of Conduct<sup>5</sup>.

---

<sup>3</sup> [https://www.hkbea.com/pdf/en/about-bea/corporate-social-responsibility/Guidelines%20and%20Policy/BEA%20Sustainability%20Policy\\_2020\\_E.pdf](https://www.hkbea.com/pdf/en/about-bea/corporate-social-responsibility/Guidelines%20and%20Policy/BEA%20Sustainability%20Policy_2020_E.pdf)

<sup>4</sup> <https://www.hkbea.com/pdf/en/about-bea/corporate-social-responsibility/Guidelines%20and%20Policy/Slavery%20and%20Human%20Trafficking%20Statement%20Dec%202020.pdf>

<sup>5</sup> [https://www.hkbea.com/pdf/en/about-bea/corporate-social-responsibility/Guidelines%20and%20Policy/Supplier%20Code%20of%20Conduct%202020%20\(Eng\).pdf](https://www.hkbea.com/pdf/en/about-bea/corporate-social-responsibility/Guidelines%20and%20Policy/Supplier%20Code%20of%20Conduct%202020%20(Eng).pdf)

## 6. Grievance and Whistleblowing Channels

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, said employees are encouraged to report and disclose information about such incidents as they reasonably consider necessary in accordance with BEA's Staff Grievance Procedures.

If employees reasonably believe that fraud, deception, theft, forgery, bribery and corruption, dishonesty, financial reporting improprieties, or any unethical, illegal, unusual, and/or questionable activities/practices are being perpetrated; or reasonably believe that other staff members are knowingly violating the policies and/or operational procedures/guidelines of the Bank, said employees should immediately report such incidents according to BEA's Whistleblowing Policy and Procedure.

For customers, suppliers, and other non-employees, the Bank's Whistleblowing Statement<sup>6</sup> provides a mechanism through which external stakeholders aware of malpractice can confidentially and anonymously report concerns to the Bank without fear of retaliation.

BEA will keep all relevant information and documents in strict confidence according to the applicable laws on the protection of personal information.

## 7. Disclosure

- 7.1 This policy is made available to the general public via BEA's website at [www.hkbea.com](https://www.hkbea.com). It is also available to staff members via the Bank's internal Corporate Information Sharing Platform.
- 7.2 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 27 (Environmental, Social, and Governance Reporting Guide) of the Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited as well as the Global Reporting Initiative Standard (Core Option).

## 8. Policy Review

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

---

<sup>6</sup> [https://www.hkbea.com/pdf/en/corporate-governance/Whistleblowing%20Statement/e\\_Whistleblowing%20Statement\\_Doc%202020.pdf](https://www.hkbea.com/pdf/en/corporate-governance/Whistleblowing%20Statement/e_Whistleblowing%20Statement_Doc%202020.pdf)

## **9. 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](mailto:sustainability@hkbea.com).