Supplier Code of Conduct

(reviewed and approved on 8th November, 2017)
Supplier Code of Conduct

As a leading provider of banking, financial, and related services, The Bank of East Asia, Limited (“BEA”) and its major group members (collectively the “BEA Group” or “we”) are aware of the positive influence that we have among our product and service providers1 (“Suppliers”) and the communities in which we operate.

We aim to drive improved performance by incorporating and embedding corporate social responsibility practices and concerns into our supply chain management processes. The BEA Group is committed to working with the Suppliers that showcase best practice, while encouraging others to develop and demonstrate improvement within these fields. Communal well-being 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.

Through greater collaboration and scrutiny of Environmental, Social, and Governance (“ESG”) concerns in our supply chain, we aim to make a difference together, fostering a better tomorrow.

The BEA Group has aimed to align this Supplier Code of Conduct (“Supplier Code”) with the values and principles set forth within a number of international charters including:

- the UN Universal Declaration of Human Rights; and
- the fundamental conventions of the International Labour Organization.

As an organisation, we seek to reference the commitments enshrined within these documents, putting into practice relevant principles and standards within all our operations. We encourage our Suppliers to aspire to the same ideals by supporting and upholding elements of this Supplier Code, while paying heed to local traditions, cultures, and norms in all operating locations.

Compliance

Where an element of this Supplier Code is stipulated by the term “shall”, the BEA Group expects compliance from all Suppliers (“Mandatory Element”). High Risk Suppliers2, a subset of Suppliers with relatively high levels of risk in their business and supply chain are required to make a declaration as designated by us. Where elements of this Supplier Code have been outlined using the term “encourage” or “advise”, it is our hope that Suppliers will demonstrate continued improvement and move toward a state of full eventual compliance in those areas within a reasonable time.

If a Supplier is found to be in non-compliance with a Mandatory Element of the Supplier Code, the BEA Group will be unable to enter into business with such Supplier unless compliance can be confirmed or with the authorisation of the BEA Group’s Senior Management. The BEA Group would be pleased to provide a reasonable degree of support to assist a Supplier in achieving compliance. If a Supplier falls out of compliance during the contract period and does not take immediate corrective steps to comply with the Supplier Code, the BEA Group may suspend the existing business arrangement with such Supplier unless compliance can be confirmed or with

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1 While the Supplier Code is prepared on the basis that Suppliers are companies, Suppliers who are individuals are still required to comply with the elements of the Supplier Code to the extent that such elements are equally applicable to individuals. If in doubt, such Suppliers should contact the BEA Group for clarification.

2 As defined by the BEA Group
the authorisation of the BEA Group’s Senior Management, or may terminate the existing business arrangement.

**Social and Ethical Standards of Conduct**

The BEA Group expects Suppliers to conduct their business in a manner that is both responsible and professional, exemplifying ethical and fair business practices throughout their operations.

Suppliers are expected at all times to adhere to the highest standards of social conduct, cultivating a culture of accountability and transparency:

- Suppliers **shall** comply with local and national legislation and avoid all forms of corruption and bribery.

- Suppliers **shall** avoid any illegal practices (including, without limitation, modern slavery and human trafficking) or misrepresentation when conducting business activities.

- The BEA Group **encourages** the establishment of relevant mechanisms and practices to ensure business integrity such as a Code of Conduct for staff members and its relevant promotion and applicability within operations.

**Conditions of Employment**

In order to safeguard the dignity and rights of workers, Suppliers **shall**:

1. Provide a work environment that is reasonably safe and hygienic for its workers where due consideration has been paid and is accordance with the requirements of the applicable laws and regulations so as to prevent accidents or harm.

2. Ensure that their operations remain free from child labour and are in accordance with local and national regulation on minimum age requirements (if any).

3. Explicitly prohibit all forms of forced, indentured, or prison labour.

4. Ensure that employees are paid wages and receive pension contributions respective of local legislation (such as minimum wage and mandatory provident fund contribution requirements). In the absence of such legislation, Suppliers are **encouraged** to be in alignment with current market standards.

5. Ensure that working hours are compliant with all local and national regulation.

6. Prohibit throughout their operations any form of discrimination, harassment, or victimisation on any ground in accordance with local and national legislations in the country where the supplier relationship is maintained (including but not limited to age, disability, national/ racial / ethnic origin, sex / gender (including pregnancy), nationality, religion, sexual orientation, family / marital status, political convictions, or union affiliation).

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3 The term 'child' refers to any person less than 14 years of age, unless the minimum age for work or mandatory schooling is higher by local law, in which case the stipulated higher age applies.
7. Prohibit throughout their operations the ownership or control of workers including the use of mental or physical threats to force workers to work or the physical constraint or restriction of workers’ freedom, which may constitute modern slavery.

8. Ensure that appropriate channels are available for discussion and recourse on labour-related issues.

**Environment**

The BEA Group recognises that the management of our environmental impacts is integral to our business, as outlined in BEA’s Environmental Policy and Corporate Social Responsibility Policy, which can be viewed at [www.hkbea.com](http://www.hkbea.com) (About BEA / Corporate Social Responsibility / CSR Reports & Related Policies). We are committed to re-assessing our business operations to create more efficient processes and manage our environmental impacts.

Suppliers **shall** at all times abide by all relevant local and national environmental legislation and act in a manner that works to ensure environmental preservation. We **encourage** Suppliers to join us in similar environmental efforts as appropriate to their business, and align with best practice activities including the following:

1. Suppliers **are advised to** minimise their environmental risks and direct impacts of their operations through the implementation of apt environmental policies and sound environmental management systems.

2. Suppliers **are advised to** minimise energy consumption and resource use, creating efficient processes as a means to manage environmental impact.

3. The BEA Group also urges the adoption of environmentally friendly technology.

**Community**

Suppliers **are advised to** be aware of the influence that they exert on the local community. The BEA Group **encourages** Suppliers to aim toward the positive development of all those in the communities in which they operate, while being mindful of the social and environmental opportunities and impacts of their operations.

Suppliers **are advised to** aim, where possible, to promote access of their services to the hearing, visually, or physically impaired, while also striving to develop products and services that support underprivileged groups.

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*The BEA Group reserves the right to review contents enshrined in this Supplier Code and adjust its content at any time with prior notice. This Supplier Code shall be subject to review on an annual basis by the BEA Group’s CSR Working Group and Senior Management.*