



## **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)

### **Anti-Bribery and Corruption Policy Statement**

#### **Purpose**

The Bank of East Asia, Limited (hereinafter called “BEA” or the “Bank”) is committed to the highest standards of business conduct and has zero tolerance for bribery and corruption. At BEA, all employees of the Bank (the “Employees”) are required to follow all applicable laws, rules, and regulations related to anti-bribery and corruption, including Section 124 of the Banking Ordinance (Cap. 155), Section 9 of the Prevention of Bribery Ordinance (Cap. 201) and guidance(s) issued by the Independent Commission Against Corruption (“ICAC”).

Employees are expected to adhere to the following rules in relation to anti-bribery and corruption:

**Conflict of Interest Policy**– The Bank has put in place a Conflict of Interest Policy to assist Employees to identify situations where conflicts of interest may arise and sets out the Bank’s measures for prevention or management of these conflicts. Whenever Employees have any financial or non-financial interest, direct or indirect, in a customer, supplier, or other principal dealing with Bank, and that interest is of such an extent that it might reasonably affect their judgment or decisions exercised on behalf of the Bank, they have to declare their interest and refrain from making the decision themselves. Employees should decline to provide any assistance, advice or information if a request is made by a customer, supplier, or other principal dealing with Bank to them for any acts that deviate from the legitimate and/or normal course of action.

**Conduct When Obtaining Business** – Employees are prohibited from offering any advantage (as defined in the Prevention of Bribery Ordinance, including but not limited to any gift, loan, fee, reward, commission, employment contract, etc.) to any person, public official, agent of a company or an organisation in relation to the business of his / its principal, in order to influence his / its execution of duties in relation to his / its principal’s affairs, whether directly or indirectly.

**Personal Benefits** – In general, Employees are prohibited from soliciting, accepting, or retaining personal benefits from any other Employee, customer of the Bank, or any individual or organisation doing or seeking to do business with the Bank.

**Communication to Employees** – BEA’s anti-bribery and corruption policies are clearly communicated to Employees at all levels in the Bank’s Code of Conduct (the “Code”), which is available via BEA’s intranet. All Employees are required to review the Code on an annual basis, and sign to acknowledge that they understand and agree to the Code. Refresher training is periodically arranged to ensure that all Employees are aware of the Bank’s zero-tolerance position on bribery and corruption.

**Whistleblowing Policy** – The Bank has also put in place a clear Whistleblowing Policy and Procedure such that staff can confidentially report any suspected bribery and corruption activities to the Bank without fear of retaliation. The Bank has also developed a Whistleblowing Statement for external parties, which is available via BEA’s homepage.

Employees who fail to comply with any internal or regulatory requirements related to anti-bribery and corruption will be subject to disciplinary action (which may include termination) initiated by the Bank and where applicable, to criminal prosecution if the law enforcement authority considers appropriate.

All agents, contractors, and suppliers are also expected to act in compliance with all applicable laws, rules and regulations related to anti-bribery and corruption at all times. BEA reserves the right to terminate any business relationship that violates BEA’s zero-tolerance policy against bribery and corruption.

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.

*(established and approved on 1<sup>st</sup> December, 2017)*