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 Statement

Purpose

The BEA Group ("Group") is committed to the highest standards of business conduct and has zero tolerance for bribery and corruption. All Group Members, including directors and staff members at all levels are required to follow all applicable laws, rules, and regulations related to anti-bribery and corruption, namely Sections 4, 8 and 9 of the Prevention of Bribery Ordinance (Cap. 201), guidance(s) issued by the Independent Commission Against Corruption ("ICAC") and other similar laws and regulations in other jurisdictions when conducting business there or where applicable.

The Group's anti-bribery and corruption requirements are stipulated in the relevant policies that are applicable to directors and staff members respectively. They are clearly communicated to all directors and staff members at all levels. The Group has a strong stance against all forms of bribery and corruption and has stipulated clearly in the relevant policies its restrictions in soliciting or accepting any advantage from others as well as offering any advantage to an agent of another or public servant by its directors and staff members. Refresher training is periodically arranged to ensure that all directors and staff members are aware of the Group's zero-tolerance stance on bribery and corruption.

Directors and staff members are expected to adhere to the Group's policies and rules in relation to anti-bribery and corruption, which include but not limited to the following aspects:

Conflict of Interest – Directors are required to observe the duties and obligations set out in the relevant policy. Similarly, staff members are required to avoid any conflict of interest situations or the perception of such conflicts. To assist staff members to identify situations where conflicts of interest may arise and to set out the Group's measures for prevention or management of these conflicts, the Group has put in place relevant policies which all staff members shall strictly follow. Whenever staff members have any financial or non-financial interest, direct or indirect, in a customer, supplier, partner, subcontractor or other principal dealing with the Group, and that interest is of such an extent that it might reasonably affect their judgement or decisions exercised on behalf of the Group, they have to declare their interest and refrain from making the decision themselves. Staff members should decline to provide any assistance, advice or information to a customer, supplier, partner, subcontractor or other principal dealing with the Group for any acts that deviate from the legitimate and/or normal course of action.

Conduct When Obtaining Business – Directors and staff members are prohibited from offering any bribe or advantage (as defined in the Prevention of Bribery Ordinance, including but not limited to any gift, loan, fee, reward, commission, employment contract, business contract, etc.) to any person, ex-employee, public servant, 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 – Directors and staff members are prohibited from soliciting, accepting, or retaining personal benefits from any other directors/staff members, customer of the Group, or any individual or organisation doing or seeking to do business with the Group. The Group has put in place guidelines and procedures which directors and staff members shall follow when personal benefits are accepted or retained under specified circumstances.

Whistleblowing – The Group has put in place the relevant policy, to ensure that there is an appropriate channel for reporting illegal, unethical practices or irregularities related to BEA Group (including any suspected bribery and corruption activities) in good faith, without the fear of personal repercussions or the risk of reprisals. The Group has also developed a Whistleblowing Statement for external parties, which is available via BEA's homepage.

Failure to adhere to Group's policies and rules in relation to anti-bribery and corruption will subject the concerned party to supervisory and disciplinary actions. Violations of the relevant laws also subject the concerned party to imprisonment and/or fines as stipulated in the relevant legislation in Hong Kong and other jurisdictions where the Group Member has presence.

All directors, agents, contractors, suppliers, associated persons, etc. are also expected to act in compliance with all applicable policies, laws, rules and regulations related to anti-bribery and corruption in the performance of their services for or on behalf of the Group. The Group reserves the right to terminate any business relationship, employment or appointment that violates the Group's zero-tolerance policy against bribery and corruption.

Banking Industry Integrity Charter

The Bank of East Asia, Limited ("The Bank") is also a signatory of the Banking Industry Integrity Charter ("Integrity Charter") introduced by the ICAC. The Integrity Charter aims to combat and prevent corruption through public-private partnership, assisting banks to enhance integrity management systems while strengthening corruption prevention awareness and related capabilities. By signing the Integrity Charter, The Bank is strengthening its sound bank culture and reiterating its commitment to the Bank's Code of Conduct. We have appointed an integrity officer to assist the Bank in the oversight and implementation of good governance. We also provide integrity training to staff and promptly report suspected corruption, fraud and other illicit activities to the ICAC or other law enforcement agencies promptly. All Group Members adhere to the fundamental principles of the Integrity Charter, where applicable to them. For more details about the Integrity Charter, please visit ICAC's website (https://cpas.icac.hk/EN/Info/TP_Library?cate_id=10046).

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.

(reviewed and approved on 19th November, 2026)