



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 4 and Section 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 countries/jurisdictions when conducting business there or where appropriate.

BEA’s anti-bribery and corruption policies including guidelines on acceptable behaviour and other relevant policies are stipulated in the Bank’s Code of Conduct (the “Code”) which is available on BEA’s intranet, and clearly communicated to Employees at all levels. The Bank has a strong stance against all forms of bribery and corruption and has stipulated clearly in the Code 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 Employees. All Employees are required to review and acknowledge that they understand and agree to the Code on an annual basis. Refresher training is periodically arranged to ensure that all Employees are aware of the Bank’s zero-tolerance stance on bribery and corruption.

Employees are expected to adhere to the Bank’s policies and rules in relation to anti-bribery and corruption, which include but not limited to the followings:

Conflict of Interest Policy – Employees are required to avoid any conflict of interest situations or the perception of such conflicts. To assist Employees to identify situations where conflicts of interest may arise and to set out the Bank’s measures for prevention or management of these conflicts, the Bank has put in place a Conflict of Interest Policy which all Employees shall strictly follow. Whenever Employees have any financial or non-financial interest, direct or indirect, in a customer, supplier, or other principal dealing with the 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 to a customer, supplier, or other principal dealing with the Bank for any acts that deviate from the legitimate and/or normal course of action.

Conduct When Obtaining Business – Employees 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, etc.) to any person, 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 – 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. The Bank has put in place guidelines and procedures which Employees shall follow when personal benefits are accepted or retained under specified circumstances.

Whistleblowing Policy – The Bank has also put in place a clear Whistleblowing Policy and Procedure, to ensure that Employees can report illegal, unethical practices or irregularities related to BEA (including any suspected bribery and corruption activities) in good faith, without the fear of personal repercussions or the risk of reprisals. 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 legal obligation or statutes, 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 concerned authority (e.g. law enforcement agencies) considers appropriate.

All directors, agents, contractors, suppliers, associated persons and 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 BEA. 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.

(reviewed and approved on 6th December, 2019)