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)

Whistleblowing Policy

Introduction

1. We at The Bank of East Asia, Limited (hereinafter called "BEA" or the "Bank") are committed to upholding the highest standards of corporate governance and professionalism.

2. This Whistleblowing Policy (the "Policy") sets out the procedure by which any person (other than employees of the Bank as provided for in paragraph 3 of this Policy) (the "Whistleblower") can report illegal, unethical practices or irregularities related to BEA in good faith, without the fear of personal repercussions or the risk of reprisals.

3. Employees[1] of the Bank should refer to a separate Whistleblowing Policy and Procedure designated for staff members, which can be accessed via the intranet of the Bank.

Issues covered

4. This Policy has been designed to provide a confidential, safe and simple setting for the Whistleblower to communicate, in confidence and without the risk of reprisal, material and bona fide concerns or observations of any violations. The issues that constitute organisational malpractice or misconduct behaviour may include but not limited to:

   - Improper conduct or unethical behaviour (e.g. deception, theft, forgery, bribery and corruption, dishonesty etc.)
   - Possible improprieties in financial reporting or fraud
   - Failure to comply with legal obligations or Statutes and/or regulatory requirements
   - Criminal or illegal activities
   - Dangers to Health & Safety or the environment
   - Attempts to conceal any of the above-mentioned issues

[1] Employees of other members of the BEA Group should refer to their respective whistleblowing policies or contact their respective Human Resources Department(s) for more information.

5. This Policy is not designed for complaints or grievances lodged by individuals. Comments related to BEA's products and services should not be reported according to this Policy unless they involve malpractice or irregularities as mentioned above. Individuals are welcome to share their opinions or make suggestions by visiting BEA's homepage at https://www.hkbea.com/html/en/bea-send-us-opinion.html

Reporting channel

6. Anyone who suspects that one or more issues specified above have been/are being perpetrated should report the issue(s) to:

Head of Human Resources Department *The Bank of East Asia, Limited* *31/F BEA Tower, Millennium City 5* *418 Kwun Tong Road* *Kowloon, Hong Kong*	***or***	*email to:* *whistleblower_hr@hkbea.com*

If the subject of whistleblowing is the Head of Human Resources Department or if the use of the above reporting channel is not appropriate, you can report the issue(s) to:

The Chairman of the Audit Committee *c/o Internal Audit Division* *The Bank of East Asia, Limited* *31/F BEA Tower, Millennium City 5* *418 Kwun Tong Road* *Kowloon, Hong Kong*	***or***	*email to:* *whistleblower_ac@hkbea.com*

(Please indicate "Confidential – WB" on the envelope)

Investigation

7. The recipient will write/respond to the Whistleblower within 7 working days wherever reasonably practicable acknowledging that the concern has been received and the matter will be investigated independently with no delay. Where the report discloses a possible criminal offence, the Bank may refer the matter to the law enforcement agent, e.g. ICAC.

8. Whistleblower will be informed of the completion status of the investigation in due course.

Confidentiality

9. All disclosures will be handled in a confidential and sensitive manner. Confidentiality of the Whistleblower will be maintained unless his/her identity has to be disclosed to conduct a thorough investigation in compliance with relevant laws and regulations, and/or guideline and to provide accused individuals with their legal rights to defend.

10. In order not to jeopardise the investigation, the Whistleblower must not disclose any information regarding whistleblowing matters to any third parties, including but not limited to family members, friends, colleagues and customers, etc, except in the circumstances where disclosure to a law enforcement agency (e.g. ICAC) and/or regulator (e.g. Hong Kong Monetary Authority, Securities & Futures Commission) is required by laws.

Protection against retaliation

11. The Bank will not retaliate against a Whistleblower. Any Whistleblower who believes he/she is being retaliated against must inform the Bank immediately by following the same reporting channel as indicated above.

Anonymous allegations

12. The Bank recognises anonymous reporting. However, Whistleblowers are encouraged to speak up in a timely manner and put their names to any disclosures they make. A Whistleblower who chooses to remain anonymous is advised that the Bank may not be able to obtain the additional information needed to investigate or address his/her concerns.

False or malicious accusations

13. The Whistleblower should not make false claims for malicious reasons or personal gain. The Bank reserves the right to take appropriate actions against any Whistleblower or other related person to recover any loss or damage resulting from a false report.

Record keeping

14. Personal data gathered during the course of the investigation will be handled in accordance with the Personal Data (Privacy) Ordinance. Data that could identify the Whistleblower will be retained for a period of seven years by the Bank from the closing date of the case.

Review of this Policy

15. The coverage and adequacy of this Policy shall be reviewed annually to ensure the whistleblowing mechanism remains relevant and effective.

16. Should there be any discrepancy between the English version and the Chinese version of this Policy, the English version shall apply and prevail.

(reviewed and approved on 19th November 2026)