BEA東亞銀行

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)

SHAREHOLDERS COMMUNICATION POLICY

1. Introduction

1.1 Pursuant to the Corporate Governance Code of the Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited (the "Listing Rules"), The Bank of East Asia, Limited ("BEA" or the "Bank") has established this *"Shareholders Communication Policy"* ("Policy") to provide institutional and individual shareholders of the Bank (the "Shareholders") with information about the Bank and its subsidiaries (the "Group"), enabling them to engage actively with the Bank and exercise their rights as Shareholders in an informed manner.

1.2 For the purpose of this Policy, references to the "investment community" are intended to include the Bank's potential investors as well as fund managers and analysts reporting on and analysing the Bank's performance.

2. General Policy

2.1 This Policy sets out the principles and the practices of the Bank in relation to communications with the Shareholders and, in appropriate circumstances, the investment community at large.

2.2 The Bank is committed to:

(i) providing Shareholders with timely, clear, and ready access to balanced and understandable information about the Group to enable them to make informed investment or investment-related decisions;

(ii) maintaining an open and regular dialogue with Shareholders, fund managers, analysts, and the media through various means with the aim of providing transparent, regular, and timely public disclosure of the Group's latest developments and strategies; and

(iii) ensuring effective and timely dissemination of information to Shareholders and the investment community at all times.

2.3 The Bank shall comply with all relevant laws, rules and regulations in all communications with Shareholders and the investment community.

3. Communication Strategies and Channels

3.1 Clear communication and easy access to information are important objectives of the Bank's communication strategy.

3.2 The Bank disseminates information to Shareholders and the investment community through a wide range of channels and means, including: publications (e.g. annual reports, interim reports, notices, circulars, and announcements), the Bank's website, and direct engagement (e.g. Shareholders' meetings, analyst briefings and press conferences).

3.3 Communication channels include:

- Shareholders meetings;
- the BEA website (www.hkbea.com);
- annual and interim reports;
- environmental, social, and governance ("ESG") reports;
- press/analyst conferences at which the Group's interim and final results are announced; and any other post-result briefings with the media and the investment community;
- announcements, notices and circulars;
- press releases;
- regular meetings with analysts, existing and potential investors; and
- roadshows targeting analysts, existing and potential investors.

Corporate Communications[1]

3.4 Corporate communications are prepared in plain English and/or Chinese languages for ease of understanding.

3.5 The English and Chinese versions of all corporate communications are available on the Bank's website at www.hkbea.com ("Bank's Website") and on the HKEXnews website at www.hkexnews.hk ("HKEXnews Website"). To stay up-to-date with the publication of all corporate communications, Shareholders and investors are encouraged to register for the News Alerts service in the Market Data section of Hong Kong Exchanges and Clearing Limited's website at www.hkex.com.hk. By doing so, a Shareholder/investor will be alerted when the Bank publishes Corporate Communications on the HKEXnews Website.

3.6 To the extent permitted under the Listing Rules, the Companies Ordinance (Chapter 622 of the Laws of Hong Kong) (the "Companies Ordinance") and the Bank's Articles of Association (the "AoA"), the Bank shall supply all corporate communications (other than Actionable Corporate Communications[2]) to Shareholders (i) by making such corporate communications available on the

[1] Corporate communications refer to any document(s) issued or to be issued by the Bank for the information or action of holders of any of the Bank's securities, including but not limited to (a) the directors' report and annual accounts together with the independent auditor's report; (b) the interim report; (c) a notice of meeting; (d) a listing document; (e) a circular; and (f) a proxy form.

[2] Actionable Corporate Communications refer to any corporate communications that seek instructions from the Bank's securities holders on how they wish to exercise their rights or make an election as the Bank's securities holders. Actionable Corporate Communications do not include notices of general meetings and proxy forms.

Bank's website and the HKEXnews Website ("Website Version") and/or (ii) by sending the electronic version of such communications to the email address provided by the Shareholders for such purpose.

3.7 The Bank shall provide corporate communications in printed or electronic form free of charge to Registered Shareholders [3] and non-Registered Shareholders[4] upon request. The relevant arrangements are disclosed under the section headed "About BEA – Investor Communication – Dissemination of Corporate Communications" on the Bank's Website.

3.8 Pursuant to the requirements of the Listing Rules, Actionable Corporate Communications shall be sent to Registered Shareholders individually either (i) by post to their addresses as they appear on the Bank's register of members; or (ii) by electronic means to the email address provided by them for such purpose.

3.9 In support of environmental conservation and for efficient communication, Shareholders are recommended to access the Website Version of all the Bank's corporate communications.

Corporate website

3.10 The Bank's Website provides Shareholders, the investment community and the general public with timely access to the Bank's latest information, including announcements, annual reports, interim reports, ESG reports and other corporate communications, financial information, corporate governance practices, business developments and operations, press releases, credit ratings and other corporate information. All announcements and corporate communications shall be maintained on the Bank's Website for at least five years from the date of publication.

Shareholders' meetings

3.11 The Bank's Board of Directors (the "Board") endeavours to maintain an ongoing dialogue with Shareholders and, in particular, to use annual general meetings ("AGMs"), extraordinary general meetings or any other Shareholders' meetings to communicate with Shareholders directly. The Chairman of the Board as well as the chairmen (or their delegates) of the Audit, Remuneration, Nomination, Risk and ESG Committees shall attend AGMs and other general meetings, where applicable, to answer Shareholders' questions. The external auditor shall also attend AGMs to answer questions about the conduct of the audit, the preparation and content of the auditor's report, the accounting policies and audit independence.

[3] A "Registered Shareholder" means a Shareholder who holds the Bank's shares in his/her/its own name and whose name appears on the register of members of the Bank.

[4] A "non-Registered Shareholder" means a Shareholder who holds the Bank's shares in the Central Clearing and Settlement System.

3.12 Shareholders are encouraged to participate in the AGMs and other general meetings of the Bank, or to appoint proxies to attend and vote for and on their behalf if they are unable to attend. Appropriate arrangements shall be in place to encourage Shareholders' participation at these meetings.

3.13 In accordance with the Listing Rules and the Bank's AoA, each of the resolutions set out in the notice of an AGM and other general meetings shall be voted on by poll, except where the chairman, in good faith, decides to allow a resolution which relates purely to a procedural or administrative matter to be voted on by a show of hands. The chairman of a general meeting shall explain the procedures for voting by poll to Shareholders and answer any questions from Shareholders regarding voting by poll at such meetings.

3.14 For each substantially separate issue to be approved by Shareholders at a general meeting, a separate resolution shall be proposed by the chairman of that meeting. Unless the resolutions are interdependent and linked, forming one significant proposal, the "bundling of resolutions" shall be avoided. If resolutions are required to be bundled, the Bank shall explain the reasons and material implications in the notice of the meeting.

3.15 The notice for AGM, together with detailed information (as contained in a circular), will be sent to Shareholders at least 21 days before the AGM. Meetings other than an AGM shall be called with not less than 14 days' notice.

3.16 Independent scrutineers shall be appointed for the vote-taking at a general meeting.

3.17 Poll results will be posted on the websites of the Bank and Hong Kong Exchanges and Clearing Limited as soon as practicable, normally on the same day of the general meeting.

3.18 The Bank shall provide information on how Shareholders can convene an extraordinary general meeting as well as the procedures and contact details for putting forward proposals at Shareholders' meetings in the Corporate Governance Report included in the Bank's Annual Report.

Inside information

3.19 The Bank has established the "*Policy on Handling and Dissemination of Inside Information*" setting out the procedures and internal controls for the handling and dissemination of inside information[5]. All inside information is to be handled in a timely manner and in such a way that it does not place any person in a privileged dealing position. The handling of inside information shall always allow time for the market to reflect the latest available information in the price of the Bank's listed securities.

[5] Inside Information shall have the same meaning as stated in Section 307A of Part XIVA Disclosure of Inside Information of the Securities and Futures Ordinance.

Enquiries or requests of Shareholders, investment community and other stakeholders

3.20 Shareholders' enquiries and requests relating to their shareholdings may be sent in writing to the Bank's Share Registrar[6].

3.21 Shareholders' enquiries and opinions for the Board's attention may be sent in writing to the Bank's registered address[7].

3.22 Shareholders, the investment community and other stakeholders may at any time provide their views or make an enquiry or request for the Bank's information (to the extent that such information is publicly available) by email to info@hkbea.com or by post to the Bank's registered address (or through the Bank's Share Registrar in the case of Shareholders).

4. Review of this Policy

This Policy shall be reviewed annually or as required to ensure its effectiveness. A statement on the Bank's review of the implementation and effectiveness of this Policy conducted during the year (including how the Bank arrives at the conclusion, together with any actions taken/to be taken (if applicable) following such review) shall be included in the Corporate Governance Report in the Annual Report.

5. In the event of a conflict between the Chinese translation and the English text hereof, the English text shall prevail.

[6] Tricor Investor Services Limited of 17/F, Far East Finance Centre, 16 Harcourt Road, Hong Kong (hotline: +852 2980 1333, email: BEA0023-ecom@vistra.com)

[7] 10 Des Voeux Road Central, Hong Kong (Attention: The Company Secretary)