

BOCHK Group Policy of Employee Diversity, Inclusion and Anti-Discrimination Implementation (Extract)

1. Purpose

The Group is committed to promote diversity and inclusion, and endeavours to provide a work environment where every employee is treated with respect and entitled to equal opportunities to showcase the strengths. This policy is formulated to clearly convey the Group's commitment to employee diversity and equal opportunities.

2. Scope of Application

This Policy applies to all BOCHK employees.

3. Principles

People-Centric Approach: The Group, as an equal opportunity employer, strives to foster a diverse, inclusive, and equal work environment to attract diverse talents, allowing employees with various backgrounds and attributes to work in a respectful and courteous environment, enabling them to unleash their potential and fully utilize their strengths. To promote gender diversity, the proportion of female employees in management positions should reach a target of 40% or above.

Merit-based Employment: The Group is committed to expanding its talent pool by attracting suitable candidates with diverse backgrounds and attributes. We adhere to the merit-based principle, ensuring all employment-related decisions are based solely on employees' strengths without any form of discrimination or bias, and ensuring all applicants (regardless of age, sex, culture, educational background, disabilities, etc.) are entitled to equal opportunities.

Fair Treatment: The Group does not allow its employees to be treated

unfavorably based on age, sex, race¹, nationality, religious beliefs, marital status, pregnancy, breastfeeding or expressing breast milk, disability, family status or sexual orientation, or set any unreasonable requirements or conditions for its employees to be treated unfavorably.

Human Rights Protection: The Group respects the political, social, and cultural contexts of its member institutions, supports and upholds employees' human rights in accordance with international standards². The Group implements rigorous recruitment procedures to avoid the employment of child labor or forced labor, and we comply with applicable laws and regulations related to freedom of association.

4. Daily Management

The Group applies the principle of equal opportunities to all employment-related routine management, human resources management and compensation and benefits policies, including recruitment, appointment and termination, job rotation, remuneration and benefits, training, appraisal, attendance, non-compliance and accountability, employee grievance handling as well as formulation of employment contract, etc.

5. Eliminating discrimination

The Group strictly abides by the “Sex Discrimination Ordinance”, the “Disability Discrimination Ordinance”, the “Family Status Discrimination Ordinance”, the “Race Discrimination Ordinance” in Hong Kong, and the local anti-discrimination laws and regulations of each member institution (collectively known as the “Discrimination Ordinance”). Under the “Discrimination Ordinance” it is unlawful to discriminate against, harass³ or vilify a colleague, a person who

¹ According to the “Race Discrimination Ordinance”, race is defined as race, colour, descent, national or ethnic origin, and the same applies below.

² Including but not limited to the International Labor Conventions applicable to the Hong Kong Special Administrative Region. Refer to <https://www.labour.gov.hk/eng/rbo/content3.htm> for details.

³ Acts deemed as “discrimination or harassment” include but are not limited to the following:

- a. Speaking derogatory words or insulting; for example, avoid engaging in name calling, which people of certain groups may find offensive or impolite;
- b. Displaying graffiti or slogans or other objects that may make people feel offended;
- c. Playing or cracking discriminative jokes, deriding or laughing at others;
- d. Communicating with a scornful or offensive tone based on a person’s sex, marital status, pregnancy, breastfeeding or expressing breast milk, disability, family status, belonging to a certain ethnic group;
- e. Rejecting contact based on a person’s sex, marital status, pregnancy, breastfeeding or expressing breast milk, disability, family status, belonging to a certain ethnic group;
- f. Designating excessive workload or high performance requirements based on a person’s sex, marital status, pregnancy, breastfeeding or expressing breast milk, disability, family status, belonging to a certain ethnic group;

may work together or an employer on the grounds of sex, marital status, pregnancy, breastfeeding or expressing breast milk, disability, family status and race.

The Group adopted the “Code of Practice against Discrimination in Employment on the Ground of Sexual Orientation” (hereinafter referred to as the “Code of Practice”). In accordance with the “Code of Practice”, both employers and employees must self-regulate, promote equality of all, and eliminate discrimination, harassment or vilification of sexual orientation.

6. Training and communication

To enhance employees' awareness of diversity, inclusion and anti-discrimination, the Group continuously strengthens publicity and education through training and other channels to reinforce employees' awareness of the rights and responsibilities under the “Discrimination Ordinance”, the “Code of Practice”, etc. This policy can be found in the BOCHK Staff Handbook for employee's reference.

7. Complaint mechanism

If employees at all levels have true and reasonable grounds to suspect or discover any situation that does not comply with the requirements of this policy, they can file a complaint with the home institution, the Department Head or the Human Resources function unit (Human Resources Department). The Group shall endeavour to seek a mutual satisfactory solution through negotiation / conciliation and strive to maintain a harmonious working environment.

The Group has a complete Complaint Handling Process, will carry out investigation upon receipt of a complaint, and inform the complainant of the result. In case where the result is not accepted, the complainant could lodge the complaint to the Equal Opportunities Committee or call the police as needed.

All complaint materials are confidential information. All personnel handling or dealing with complaints must strictly protect the privacy and legal rights of both

g. Unreasonably picking out a person based on sex, marital status, pregnancy, breastfeeding or expressing breast milk, disability, family status, belonging to a certain ethnic group;

h. Making sexual harassment, such as making an unwelcome request for sexual favours, engaging in conduct of a sexual nature, creating a sexually hostile or intimidating working atmosphere, etc.

the complainant and the party being complained, and must not disclose any information to unauthorized personnel. It is strictly forbidden to transfer complaint materials to the unit or individual being complained. No unit or individual may pursue or retaliate against the complainant under any pretext or by any means.

8. Monitoring and Disclosure

The Group discloses information including but not limited to this policy or a summary of this policy, any plans or measurable objectives the Group established to achieve gender diversity, and the gender ratio of its employees, etc. through appropriate channels (such as the “Corporate Governance Report” and/or “Sustainability Report” in its Annual Report, official website, etc.).

9. Management Structure and Division of Work

Supervisors at all levels shall vigorously promote the diversity and inclusion culture as well as eliminate discrimination in employee management and daily management in accordance with the local laws and regulations of member institution and the relevant regulations of the Group. They shall lead by example to promote the implementation of the requirements in the policy. If any acts of discrimination, harassment, etc. are found, employees shall report in accordance with the relevant requirements of the Group and take appropriate action.

Employees should jointly create a comfortable and mutually respectful work environment with the Group where discrimination or harassment are disallowed, and should not discriminate against, or harass or vilify on such grounds as age, sex, race, nationality, religious beliefs, marital status, pregnancy, breastfeeding or expressing breast milk, disability, family status or sexual orientation. If a colleague sincerely raises a complaint of discrimination, harassment, etc., supervisors at all levels and other employees should adopt a positive attitude and must not retaliate. If an employee is discriminated against or harassed, he or she should clearly indicate that he or she has not accepted such behavior, and may report it to the Department Head or directly inform the HR function unit of the home institution to help stop discrimination or harassment. Any employee who discriminates, harasses, vilifies or violates the principles of diversity and inclusion advocated in this policy, or who maliciously fabricates or

exaggerates related behaviors when filing a complaint, may be handled or subject to disciplinary action after investigation and verification by the Group, depending on the severity of the case. Those who violate the “Discrimination Ordinance” may also face legal consequences.

10. Review and Amendment

This policy shall be reviewed on an annual basis, and shall be reviewed and amended from time to time as the case requires.