



集友銀行
Chiyu Banking Corporation Ltd.

Employee Code of Conduct (the “Code”)

1 Objective

The Bank strictly adheres to the principle of compliance operations. Employees of the Bank are required to uphold stringent discipline and compliance, adhere to all rules set forth by the Bank and regulatory bodies, actively assist the Bank in carrying out its compliance obligations, continuously raise awareness of compliance issues, and offer feedback that can help the Bank's compliance culture.

In order to guide and standardize employee behavior, the Code is hereby formulated to clarify the fundamental principles regarding the Bank's human resource management and ensure that employees are aware of the need to maintain a high level of personal integrity and good standards of conduct when conducting the Bank's business and handling personal finances.

2 Scope of Application

The Code applies to domestic and foreign employees of all divisions, branches, and subsidiaries of the Bank.

The provisions contained in the Code shall not be deemed to replace or affect the interpretation of the relevant provisions under the Banking Ordinance or other ordinances applicable to authorized institutions, such as sections 8 and 9 of the Prevention of Bribery Ordinance.

The Supervisory Policy Manual CG-3 Code of Conduct provides the foundation upon which the Code is developed. Employees should read the Rules carefully in conjunction with other relevant sections under the Supervisory Policy Manual, including CG-1 Corporate Governance of Locally Incorporated Authorised Institutions, applicable to locally registered authorized institutions, CG-5 Guideline on a Sound Remuneration System, CG-6 Competence and Ethical Behaviour, and applicable guidelines as issued and updated by the HKMA from time to time.

3 Management Regulations and Procedures

The Bank is required to comply with the relevant guidelines of the HKMA on cultural change and create and promote a good corporate culture internally so as to support the Bank's steady development and risk management, motivate employees to adopt appropriate personal behaviors, thereby achieving good client satisfaction within the industry and high ethical standards for practitioners. Promoting the continuous strengthening of corporate culture does not only ensure the safe operation and steady development of the Bank, it also effectively protects the interests of our clients while pursuing commercial interests.

The Code of Conduct contains a set of ethical values that the Bank expects its employees to uphold in the performance of their duties. It is specifically reflected in the personal conduct and ethics of employees, which primarily includes the following aspects.

3.1 **Love the nation, love Hong Kong and love the Bank**

Employees ought to take ownership of safeguarding the interests and reputation of the nation, Hong Kong and the Bank, and assist in the implementation of the Bank's corporate social responsibility policies. Along with enjoying working in a team, employees should also take an active part in social welfare initiatives and other events that the bank hosts. They should also fully implement all guidelines and policies set forth by the Bank.

3.2 **Be dedicated and enthusiastic**

Employees should be aggressive, diligent, and driven to advance their knowledge and skills; they should take initiative, take responsibility for their work, and do their best to fulfill a variety of job duties; coworkers should respect, encourage, and collaborate with one another in the workplace.

3.3 **Be professional and competent**

Employees should be equipped with professional knowledge, qualifications and skills required for contemporary financial roles while continuously learning to enhance their competency in policies and regulations, banking operations, and risk control. Employees should make an effort to improve their own technological and data analytic abilities, such as the application of artificial intelligence, acquire cross-border and cross-industry expertise, and develop specialized soft skills like creativity.

3.4 **Be service-oriented**

Employees should approach clients with sincerity and enthusiasm while being modest and courteous. They should not be scared to go through cumbersome procedures. Tasks from clients should be addressed quickly and precisely. Out-of-scope tasks should be assigned to more experienced staff members or the appropriate department/division. Employees should also provide each other with expert and superior services as suggested by the above ethos.

3.5 **Be courteous and disciplined, and avoid conflicts of interest or roles**

3.5.1 In order to protect the interests of the Bank and its clients, employees at all levels must be courteous and disciplined with high moral integrity, and must not engage in the following behaviors:

- (1) Claiming benefits
 - (a) Employees should not use their positions for personal or indirect gain, such as benefiting their relatives or other related parties, or try to persuade other employees to take any actions with the intention of obtaining personal or indirect benefits.
 - (b) Employees shall not engage in corrupt activity, commission collecting, conduct embezzlement behavior or engage in other forms of malpractice for personal benefit.
 - (c) Employees should actively discourage clients from providing any form of personal benefit, such as presents, favors, services, loans, fees or anything of monetary value of any kind.
 - (d) Employees shall not solicit personal benefits from the Bank's clients, persons/institutions that have business dealings with the Bank, or persons/institutions that are interested in establishing relationships with the Bank, nor they shall accept and retain the aforementioned personal benefits.

(2) Receiving benefits

Except for gifts from external divisions, normal business entertainment, such as standard banquets and business etiquette activities that comply with the Bank's regulations, employees shall not accept or retain any benefits.

(3) Transfer of interests to external parties

Employees shall not transfer benefits to anyone in any form or through improper means.

Employees are governed by the Prevention of Bribery Ordinance and all employees shall fully understand and strictly abide by such ordinance.

(4) Drug abuse and other illegal activities

Employees shall not take drugs, join illegal organizations, nor engage in other illegal behaviors.

(5) Gambling

Employees shall not engage in any form of illegal gambling nor engage in any form of gambling or betting activity with clients.

(6) Investment in violation of rules

(a) Employees shall not engage in leveraged transactions or short selling transactions.

(b) Employees shall not open margin or leverage accounts, including accounts opened by employees in personal capacities, joint name accounts, or accounts opened as trustees, that is, as authorized signers of other people's accounts, including accounts under omnibus accounts.

(7) External guarantee

Employees shall not provide external guarantees in the name of Bank.

(8) Monetary transactions with clients

Employees shall not conduct monetary transactions with clients to avoid situations that create role conflicts and may lead to or involve actual or potential conflicts of interest.

3.5.2 When performing duties, if the relevant work involves employees or their relatives, they should proactively report to the department/division supervisor, who will decide whether work arrangements should be adjusted.

3.6 Compliance with regulations and various rules set forth by the Bank

3.6.1 Employees must comply with various laws and guidelines related to the supervision of bank operations, such as the statutory guidelines as stipulated in the Supervisory Policy Manual of the Hong Kong Monetary Authority, including the Code of Conduct, the Guideline on Anti-Money Laundering and Counter Financing of Terrorism, the Prevention of Bribery Ordinance, and the relevant laws involving intellectual property and environmental protection, and abide by various business operations and human resources management rules and regulations formulated by the Bank from time to time:

(1) Loans approval

Approving credits in accordance with the provisions under the Bank's lending business approval right.

- (2) Accepting borrowings
Employees or their relatives shall not accept borrowings or credits with special offers from others and shall not make borrowings from clients.
- (3) Conduct when seeking business opportunities
All employees are required to comply with the statutory provisions under Section 9 of the Prevention of Bribery Ordinance and Section 124 of the Banking Ordinance.
- (4) Information usage
Employees should carefully handle confidential information in accordance with relevant legal requirements and the Bank's relevant regulations.
- (5) Personal investment
Employees should comply with the relevant regulations regarding trading of securities by employees.
- (6) Compliance with the professional codes for each position
Employees must abide by the professional codes and relevant laws and regulatory guidelines for their respective positions.
- (7) Conflicts of interest
Employees are advised to refer to the Corruption Prevention Guide for Banks published by the Independent Commission Against Corruption for relevant content and cases on conflicts of interest, including but not limited to the following:
 - (a) Outside employment: Employees holding any part-time positions must comply with the relevant provisions under the Part-time Positions of Employees.
 - (b) Relative avoidance: Employees should abide by the relevant provisions under the Relative Avoidance and avoid conflicts of interest or roles.
 - (c) All employees should avoid situations that may give rise to or involve actual or potential conflicts of interest.
- (8) Reporting mechanism
 - (a) When employees act in accordance with reasonable principles and suspect that there are ongoing illegal activities, they should immediately report to the appropriate authorized personnel, including but not limited to division supervisors, code officers, human resources directors, senior management personnel, the chairman of the board of directors and the chairman of the audit committee, etc., in accordance with relevant reporting regulations.
- (9) Equal working environment

Employees should abide by the Equal Opportunities and Anti- discrimination Policy and work with the Bank to establish and maintain an equal working environment.

3.7 Compliance with corporate culture

The formulation of corporate culture and values is essential to enhancing a company's competitive edge and forging strong emotional bonds with both our employees and clients. Such values encourage clients to maintain long-term and mutually beneficial relationships with the Bank. These values also inspire new hires to join us and current employees to continue to work for us. In particular:

Vision	<ul style="list-style-type: none"> ✧ To establish an overseas flagship of the group and become an international boutique bank with good reputation and excellent quality
Mission	<ul style="list-style-type: none"> ✧ To provide quality services to clients ✧ To create excellent values for shareholders ✧ To secure good returns for employees ✧ To take more responsibility for society
Core Values	<ul style="list-style-type: none"> ✧ Integrity, People-oriented, Innovative Development and Caring for the Society

3.8 Protection of whistleblowers

3.8.1 The Bank will fully follow up and handle reports in strict accordance with internal regulations and will keep all reports and inquiries confidential as appropriate to protect the identities of whistleblowers from being made public.

3.8.2 The Bank will fully support employees who faithfully report possible or actual violations. Anyone who attempts to threaten or retaliate against a complainer or whistleblower is subject to disciplinary action, including possible summary dismissal. In the event of law violation, the Bank will report the incident to relevant external agencies in accordance with laws and regulations.

3.9 All Employees

Employees at all levels should take the initiative to learn and strictly abide by the Code. The Bank will enforce punishment to employees in accordance with relevant regulations in case of violation of the Code.

4 Formulation, Review, and Revision

4.1 Subjects not covered by the Code shall be applied in conformity with relevant laws, regulations, regulatory requirements, and the requirements under the Bank's relevant system. Should there be any discrepancies between the Code and the relevant laws, regulations and regulatory provisions, the latter shall prevail.

4.2 The Employee Code of Conduct shall be periodically reviewed, amended as needed, and suitable optimization steps will be implemented on time.

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