



BUSINESS CODE OF CONDUCT

AIRSTAR BANK LIMITED

2025.11

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1. Introduction

1.1 Overview

The core values of Airstar Bank Limited (the "Bank") rely heavily on its professionalism, high ethical standard, operating with transparency and fairness and its emphasis on fighting financial crime in any forms. This Business Code of Conduct (the "Code") of the Bank outlines a set of guidelines to ensure that the Bank, the directors and its employees adopt such values in its day-to-day business and the handling of related relationship.

The Board of Directors ("the Board") has an important role in establishing the overall bank culture of the Bank (including the expected values and behaviour as well as ethical standards), ensuring the Bank conducts its affairs with a high degree of integrity, and reviewing and approving the Code.

2. Our People

2.1 Ethical Values

The Bank is committed to upholding the highest standard of honesty, fairness, integrity, diligence, responsible citizenship, accountability and professionalism in order to maintain good faith and to preclude them from bringing the Bank into disrepute or causing harm to the Bank's reputation.

2.2 Equal Opportunities and Discrimination Free Work Environment

The Bank is committed to providing a work environment that promotes equal opportunities and is free from discrimination. Conduct that creates harassment, hostility and vilification in a work environment is strictly prohibited. All directors and employees must comply with all the applicable statutory, regulatory and internal requirements regarding anti-discrimination. There are four main anti-discrimination ordinances in Hong Kong, namely Sex Discrimination Ordinance, Disability Discrimination Ordinance, Family Status Discrimination Ordinance and Race Discrimination Ordinance as well as various Codes of Practice issued by the Equal Opportunities Commission.

2.3 Conducive and Healthy Environment

The Bank is committed to conducting its business in such a way that the health and safety of its customers, directors and employees and the environment are not harmed. Therefore, all directors and employees are not permitted to use, sell, possess or come under the influence of illegal drugs or inappropriate / excessive use of alcohol:

- (a) While conducting business for the Bank;
- (b) Whether or not consumed during working hours; and

- (c) Whether or not consumed on the Bank's premises.

2.4 Conflict of Interest

Avoiding situations that may lead to or involved a conflict of interest, actual or potential and, in case of doubt should seek advice from the Chief Compliance Officer to establish and strengthen corruption prevention capabilities in our banking operations.

2.5 Environment Protection

The Bank complies with environmental, safety, health laws and regulations when conducting business. Employees are encouraged to employ processes that minimize waste and protect the environment by conserving resources, recycling, and reusing materials.

2.6 Bank Assets / Information and Customer Funds

Employees must not misuse their official position in the Bank to pursue their own private interests, which include both financial and personal interests and those of their family members, relatives or close personal friends.

2.7 Personal Benefits

All employees should not use the power or authority deriving from their position to gain, or to influence other employees to take any action in order to gain a personal benefit or an indirect benefit (e.g. for the relatives or other related parties).

All employees should actively discourage customers of the Bank from offering personal benefits of all kinds (including every type of gift, favour, service, loan, fee or anything of monetary value).

2.8 Anti-bribery

No employees shall offer any bribe or similar consideration to any person or company in order to obtain business for the Bank.

3. Our Customers

3.1 Treating Customer Fairly

Treating our customers fairly is important as we care about customers' need and experience. Therefore, it is our core value to treating our customers fairly and with respect as well as providing excellent service to our customers is an integral part of the Bank's strategy.

3.2 Protecting Customers' Information

We handle information related to customers carefully in compliance with relevant statutory requirement, such as Personal Data Privacy Ordinance ("PDPO") and common law customer confidentiality.

4. Political and External Activities

4.1 Complying with Laws and Regulations

We are responsible for knowing and complying with the laws and regulations of the countries in which their business operates, including but not limited to those pertaining to customs and export control, and this Code is required to be reviewed and approved by the Board annually.