



## **Purpose**

Public Financial Holdings Limited (“PFHL”) and its subsidiaries (the “PFHL Group”/ “We”) are committed to providing excellent customer services and excelling in corporate governance. We will uphold the highest standards of quality and integrity in our dealings with third-party suppliers, service providers, consultants and contractors (collectively, “Vendors<sup>1</sup>”). Our supply chain plays an important role in our overall sustainability performance and therefore, we seek to partner with Vendors who share our commitment to sustainability and corporate responsibility. The Vendor Code of Conduct (the “Code”) sets out the good behaviours and high standards we expect from our Vendors in order to prevent regulatory, environmental and social risks that may arise in our supply chain. The Code is only applicable to Vendors contracted with Hong Kong operations of the PFHL Group.

The Code aims to align with the values and principles of a number of local and international charters, including but not limited to:

- The Environmental, Social and Governance Reporting (“ESG”) Code as set out in Appendix C2 of the Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited;
- United Nations Universal Declaration of Human Rights;
- United Nations Guiding Principles on Business and Human Rights; and
- The principles as set out in the International Labour Organization’s (ILO) Fundamental Conventions.

## **Compliance with the Code**

We expect our Vendors to adhere to the requirements of the Code. All Vendors whom we have entered into legally binding contractual agreements with terms and conditions stipulated therein will be provided with the Code. Where provisions of the Code are outlined by the term “shall”, we expect mandatory compliance by the Vendors. Where provisions under the Code are specified using the term “encourage”, we hope to inspire our Vendors to demonstrate continuous improvement and work towards full alignment in those areas within a reasonable time.

In cases where a Vendor is found to be in violation of the mandatory provisions of the Code, we will work with the Vendor on an improvement plan. This may include regular monitoring of Vendors’ progress and the provision of relevant resources to achieve compliance. If the Vendor continues to be non-compliant with the Code, we will take steps to review the terms of the contract or even terminate the contract.

### **1. Anti-Bribery and Corruption**

We are committed to conducting business free from bribery or unethical activities by complying with the relevant laws and regulations, including but not limited to, the rules or regulations issued by The Stock Exchange of Hong Kong Limited, Hong Kong Monetary

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<sup>1</sup> While the Code is prepared on the basis that Vendors are companies that provide goods and services to PFHL Group, Vendors who are individuals are still required to comply with the Code to the extent that the provisions in the Code are equally applicable to individuals. In case of doubt, Vendors should contact the PFHL Group for clarification.

Authority, The Hong Kong Association of Banks and The DTC Association (The Hong Kong Association of Restricted Licence Banks and Deposit-taking Companies).

Our Vendors shall not offer, pay, promise or authorise any bribes, kickbacks or other payments or benefits to anyone to obtain business or gain an improper advantage and they shall not violate any applicable anti-corruption and anti-bribery laws. The PFHL Group has put in place the Whistleblowing Policies and Procedures<sup>2</sup> to provide an avenue for all staff and various stakeholders to report any illegal, unethical, questionable practices and any improper conduct committed or about to commit within PFHL Group. Confidential reporting channels<sup>3</sup> are set up for Vendors to report the aforementioned matters.

## **2. Anti-Money Laundering and Counter-Terrorist Financing**

We strictly comply with laws and regulations associated with Anti-Money Laundering and Counter-Terrorist Financing (“AML / CTF”). Our Vendors shall:

- Not engage in or attempt to engage in any transactions involving proceeds derived from unlawful activities;
- Perform applicable AML / CTF related responsibilities in utmost good faith and immediately report to us any matter suspected to be related to money laundering or terrorist financing; and
- Not have dealings with individuals or entities that are subject to international economic or legal sanctions (e.g. suspected terrorists or drug traffickers).

## **3. Fair Dealing and Fair Competition**

We do not tolerate any attempt or act of taking advantage of anyone through manipulation, concealment, abuse of privileged information, intentional misrepresentation of facts or any other unfair practices. Vendors shall comply with the relevant laws and regulations, including but not limited to, the Competition Ordinance. Unfair competition practices such as price fixing or bid rigging must not be allowed.

## **4. Data Privacy and Security**

Vendors shall protect the privacy of our data, comply with contractual requirements and the applicable data protection regulations including the Personal Data (Privacy) Ordinance, and secure our data against unauthorised access or use. Our Vendors shall:

- Not access or disclose any non-public information about us to third parties except as authorised by us or required by law;
- Return or destroy completely all documents and other materials that involve confidential, sensitive and proprietary information depending on the appropriate number of days decided by us and the contractor; and
- Immediately notify us of any unauthorised access, leakage or disclosure of our data.

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<sup>2</sup> Please contact Human Resources Department of Public Bank (Hong Kong) Limited (“PBHK”) for the Whistleblowing Policies and Procedures of PFHL, PBHK and Public Finance Limited (“PFL”) and Credit Administration and Control Department of Winton Financial Limited (“Winton”) for such policy and procedure of Winton.

<sup>3</sup> Vendors of PFHL, PBHK, PFL and Winton can email to [pflalert@publicfinancial.com.hk](mailto:pflalert@publicfinancial.com.hk), [pbhkalert@publicbank.com.hk](mailto:pbhkalert@publicbank.com.hk), [pflalert@publicfinance.com.hk](mailto:pflalert@publicfinance.com.hk) or [wflalert@wintongroup.com.hk](mailto:wflalert@wintongroup.com.hk) respectively for whistleblowing matters.

## 5. **Ethics**

To avoid conduct that creates a conflict of interest and / or other impropriety, our Vendors shall:

- Not offer, promise, authorise, give, demand or accept any gift, fee, reward or other advantages to or from any person as an inducement, or not secure any other improper advantages;
- Not do anything which is dishonest, illegal, or in breach of trust;
- Not give incentives to our employees or others who do business with us to avoid violating the Code without the knowledge and permission by the Senior Management of PFHL Group;
- Disclose timely if any of the Vendor company's shareholders, sole proprietors, partners, beneficial owners, or directors are known to be related to any staff and / or directors of PFHL Group;
- Not engage in or support human trafficking;
- Not submit inaccurate proposals or invoices to us; and
- Ensure the products and services supplied to us are of quality, safety standards, meet our requirements and expectations, and comply with all applicable laws and regulations.

Our Vendors are encouraged to:

- Support fair-trade and ethical sourcing practices relevant to the products or services provided;
- Commit to eliminating employment barriers for the disadvantaged; and
- Provide products and services that are accessible to people with special needs.

## 6. **Labour Practices**

Our Vendors shall respect and protect the human rights of their labour and shall:

- Prohibit the use of all types of forced labour and child labour;
- Ensure a fair and equitable working environment that is free from any form of harassment or discrimination based on age, race, disability, gender and sex, marital and family status, pregnancy, religion, political views or union affiliation; and
- Set working hours, mandated minimum wages, employees' compensation insurance and employment contracts that comply with the relevant laws and regulations to ensure the health and well-being of labour.

Our Vendors are encouraged to:

- Have clear, uniformly applied disciplinary practices and grievance procedures that include provisions prohibiting any forms of abuse.

## 7. **Health and Safety**

Our Vendors shall:

- Abide by local laws and regulations in relation to health and safety.

Our Vendors are encouraged to:

- Provide a safe and clean working environment with minimal health hazards or harm to labour; and
- Establish and follow a clear procedure related to occupational health and safety.

## 8. **Environmental Practices**

Our Vendors shall actively protect the environment. We invite our business partners and Vendors to emulate the standards, practices and principles outlined below and in the “Environmental Responsibilities” section under our Environmental, Social and Governance Policy which can be obtained by contacting Corporate Culture and Sustainability Department of PBHK via [CSRadmin@publicbank.com.hk](mailto:CSRadmin@publicbank.com.hk). Our Vendors shall:

- Comply with the relevant environmental legislation and mandatory standards;
- Monitor, control and properly manage waste, wastewater and greenhouse gas emissions generated by business operations, industrial processes and sanitation facilities as required by environmental legislation and mandatory standards; and
- Ensure compliance with the relevant legislation on the handling or disposal of any hazardous materials used in the business operations.

Our Vendors are encouraged to:

- Establish an environmental policy to manage and monitor environmental impacts from business operations including greenhouse gas emissions, water, waste, air quality, raw material usage and biodiversity;
- Minimise energy consumption, pollution and carbon footprint generated from business operations;
- Make use of technologies to reduce excessive resource consumption such as paper usage;
- Minimise the need for business travel;
- Make use of environmentally-friendly and recycled goods, and / or sustainable forest products in business operations;
- Minimise waste production by reducing it at source or by carrying out practices such as recycling and reusing materials, using substitutes, and maintaining and conserving used materials;
- Reduce air emissions from volatile organic chemicals generated during business operations;
- Implement carbon emissions management and set their own climate targets (e.g. carbon emissions reduction target, carbon neutral or net zero targets) appropriate for their size and nature of business;

- Voluntarily disclose the emissions related to their operations through disclosure reports or reputable reporting platforms. The PFHL Group may in the near future request Vendors to provide carbon emissions data for the purpose of disclosure in its ESG Report;
- Build resilience over time to respond to the associated physical risks (e.g. increase in financial risks and disruption to supply chains) arising from climate change; and
- For Vendors of critical services, to manage their climate-related risks, ensuring that the provision of products and services to the PFHL Group are not disrupted.

## 9. **Monitoring**

The Code is made available to our Vendors via PFHL website<sup>4</sup> and by written request. The abovementioned requirements have listed out the relevant policies and measures that Vendors should have / should be encouraged to have in place to ensure compliance with the Code. If needed, we may require an audit upon reasonable notice, self-declaration or self-assessment of the Vendor's adherence to the Code.

## 10. **Review**

The Code will be reviewed by Bank Culture and Sustainability Working Group at least annually or as and when necessary to ensure that it remains applicable. The review result and proposed changes, if any, shall be tabled to Bank Culture and Sustainability Steering Committee of PBHK, and Bank Culture and Sustainability Committees and Boards of Directors of PBHK and PFL for concurrence, and the Board of Directors of PFHL for approval. We will notify the Vendors as soon as practicable if there is any update on the Code.

If there is any inconsistency or ambiguity between the English version and the Chinese version, the English version shall prevail.

November 2025

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<sup>4</sup> PFHL website [[www.publicfinancial.com.hk](http://www.publicfinancial.com.hk)]

**Acknowledge Receipt of Vendor Code of Conduct**

Please sign the acknowledgement and return a copy of this signed acknowledgement receipt to PFHL Group’s representative no later than [                      ].

By signing this acknowledgement receipt, I / we hereby confirm that:

1. I / We understand and agree that I / we will conduct my / our business in conformity with the standards set forth in PFHL Group’s Vendor Code of Conduct;
2. I / We acknowledge that the failure to comply with PFHL Group’s Vendor Code of Conduct may result in my / our termination as a qualified Vendor to PFHL Group.

**Contact Details of PFHL Group (To be completed by PFHL Group):**

<b>Company:</b>	(Please <input checked="" type="checkbox"/> where appropriate)		
	<input type="checkbox"/> Public Financial Holdings Limited <input type="checkbox"/> Public Bank (Hong Kong) Limited <input type="checkbox"/> Public Finance Limited <input type="checkbox"/> Winton Financial Limited		
<b>Department Name and Staff Name:</b>			
<b>Office Telephone No.:</b>			
<b>Office Fax No.:</b>			
<b>Office Email:</b>			

**Vendor Information (To be completed and signed by the Vendor):**

<b>Signature:</b>			
<b>Full Name in Block Letters:</b>			
<b>Job Title / Position:</b>			
<b>Company Name:</b>			
<b>Company Address:</b>			
<b>Telephone No.:</b>		<b>Fax No.:</b>	
<b>Email:</b>			