

Bank of China (Canada)

STATEMENT OF CODE OF CONDUCT AND ETHICAL PRACTICES

The purpose of the Code of Conduct at the Bank of China (Canada) (the “Bank” and “BOCC”) is to describe the standards of conduct required by its employees and Directors on how to deal with each other, our BOCC customers, the regulators, our suppliers and vendors, and the general public with high integrity and in a professional manner to safeguard the Bank’s reputation. BOCC’s ethical practices and standards in the Code of Conduct allows the Bank to achieve its goal to maintain the public’s trust and to preserve the quality of the work environment by following the principles of respect, integrity, ethics, honesty, fairness, compliance with the law, and professionalism.

As a responsible business organization and corporate citizen, BOCC is committed to conducting its affairs to the highest ethical standards at all times. The Bank’s Code of Conduct applies to all BOCC employees and Directors at all locations in Canada and is also applicable at any function an employee or Director attends during the course of their employment. Every employee and Director of BOCC is required to review the Bank’s Code of Conduct and expected to be truthful, respect others, act with integrity, and demonstrate honestly in the performance of their work.

Financial services are heavily regulated in Canada, and respecting the law and making the right decision is expected in our line of work. All employees and Directors are expected to be familiar with and observe all laws and regulations as part of their responsibilities. When in doubt about any course of action or unclear about regulatory requirements, employees shall seek guidance, direction, and advice of a supervisor and / or obtain legal or compliance consultation for clarification. The Bank has policies and procedures in place as controls to ensure that BOCC employees and Directors follow and comply with all laws that govern our activities.

BOCC is committed to protecting and safeguarding the personal and business information related to its customers and employees. The Bank’s employees and Directors are responsible for adhering to privacy laws and ensuring that private and confidential information in our custody and entrusted to us by our customers is well protected, stored securely and handled in an appropriate manner. Our employees and Directors must follow BOCC’s policies and standards on privacy and information security.

Conflicts of interest should be avoided as employees and Directors have an obligation to act in the best interests of BOCC, and workplace violence and harassment is not tolerated as individuals have the right to work in a secure, healthy and safe environment free from harassment, discrimination and retaliation. Any employee who attempts to intimidate or retaliate against anyone who has in good faith made a report of a violation of the Code of Conduct will face disciplinary action up to and including

termination of employment. The Bank has a Whistleblowing Policy in place which is updated on an annual basis to protect its employees against any threats of retaliation in the event unethical behavior or wrongdoings are reported. A report of a violation is confidential and privileged, and will be investigated until its resolution.

In the event an employee is uncertain about what is the most appropriate course of action in a particular situation, the Code of Conduct should be the main point of reference. If the employee requires more guidance, he / she should consult with their supervisor or the Chief Compliance Officer. Being dependable and doing the right thing go hand in hand at the Bank, and a conveying a strong ethical culture starts from the tone of top.

BOCC updates the Code of Conduct every year to keep it current with any emerging new regulations and industry best practices. All new employees and Directors also review and attest to the Bank's Code of Conduct when they are hired. Furthermore, all current employees and Directors are required to review and acknowledge that they have read the Code of Conduct on an annual basis. Also, all employees and Directors must report any violations of the Code of Conduct in a timely fashion when they witness or reasonably suspect any incidents of misconduct, breaches or unethical behavior.

Complying with and living up to the principles of the Code of Conduct, and working together in an ethical manner are integral to the way the Bank conducts its business. At BOCC, we will continue to strive in protecting the Bank's reputation by serving our customers professionally and by treating each other with respect as it is the right thing to do.