MODERN SLAVERY STATEMENT 2025

Bank of China (Australia) Limited

Bank of China Limited, Sydney Branch

18 June 2026

INTRODUCTION

This statement applies to Bank of China (Australia) Limited ACN 110 077 622 (**BOC Aus**) and Bank of China Limited ARBN 002 979 955, Sydney Branch (**BOC SB**) (together referred to as "**we**", "**our**" and "**the Bank**" in this statement). The statement sets out our approach to preventing slavery and human trafficking in our own business and supply chains.

This is our sixth report made under the provisions of the *Modern Slavery Act 2018* (Cth) (**Act**) and with reference to the *Commonwealth* Modern Slavery Act 2018 - Guidance for Reporting Entities (May 2023) (**Guidance**) issued by the Attorney-General's Department.

OUR ORGANISATION'S STRUCTURE AND OUR BUSINESS

BOC Aus, incorporated in Australia, is a full service bank offering retail banking services in Australia. BOC Aus is a wholly owned subsidiary of Bank of China Limited, incorporated in China. BOC Aus is authorised by the Australian Prudential Regulation Authority (**APRA**) to carry on banking business in Australia as a locally incorporated authorised deposit-taking institution and also holds an Australian Financial Services Licence No. 287322 issued by the Australian Securities and Investments Commission (**ASIC**) to carry on a financial services business in Australia. BOC Aus also holds an Australian Credit Licence No. 287322 issued by ASIC to provide consumer credit products.

BOC Aus offers retail banking services to retail consumers including current accounts, savings accounts, debit and credit cards, ATM services, cheque services, internet banking & mobile banking services and home mortgage loans. There are 13 retail banking branches in Australia, located in Queensland, New South Wales, Victoria, South Australia and Western Australia.

BOC SB is an Australian establishment of Bank of China Limited, incorporated in China, operating through its Sydney Branch. It is authorised by APRA to carry on banking business in Australia as a foreign authorised deposit-taking institution and also holds an Australian Financial Services Licence No. 230547 issued by ASIC to carry on a financial services business in Australia.

BOC SB provides a range of wholesale products to corporate clients such as: commercial banking, corporate lending, syndicated loan facilities, trade finance, money market, foreign exchange, and debt capital market services. BOC SB's corporate and trade finance business encompasses funding and advisory services for Chinese as well as Australian corporates. BOC SB is also the official RMB clearing bank in Australia through Austraclear.

BOC SB and BOC Aus operate separately with BOC SB's Australian operations managed by its Senior Management team (**Senior Management**) and BOC Aus governed by its Board of Directors (**Board**). However, BOC SB and BOC Aus share the same premises and have joint functional support services such as personnel, treasury and operational resources under an outsourcing arrangement between BOC SB and BOC Aus, with BOC SB being the service provider. The registered address for both BOC SB and BOC Aus is 140 Sussex Street, Sydney NSW 2000. As BOC Aus and BOC SB use many policies and processes together, and operate in the same sector and have many shared suppliers, a single consolidated description of the actions taken to address modern slavery risks is set out in this statement. There are 572 full time employees of the Bank in Australia as at 31 December 2025.

OUR SUPPLY CHAINS

The Bank's supply chains include suppliers for the following goods and services provided to the Bank in respect of:

- hard and soft facilities management;
- real estate;
- recruitment;
- travel;
- cash management;
- marketing and communication;
- mail and logistics;
- IT & telecommunications;
- security;
- legal services;
- finance/mortgage broking;
- valuation;
- audit services;
- consulting services;
- credit reporting;
- printing;
- cleaning; and
- catering & hospitality.

RISKS OF MODERN SLAVERY

Having considered key risk areas such as geographic, sectors and industries, products and services and supplier business models or practices, we consider the risk of modern slavery within our immediate operations to be low, on the basis that we are a financial services organisation that employs a professional workforce. We have also considered at an overarching level whether the Bank may be exposed to modern slavery risks through its financial lending practices, and consider such risks to be low given the nature of the Bank's lending activities. However we are conscious that through our supply chains, we can be directly linked to the risk of modern slavery, including risks to vulnerable workers such as those in low-skilled, outsourced or subcontracted roles. We acknowledge that our visibility of labour practices beyond our direct (tier one) suppliers is limited. Key areas of risk are identified to be:

- outsourcing cleaning services for the Bank's offices around Australia; and
- outsourcing staff canteen and food catering services at the head office in Sydney.

However, we have currently assessed that such risks are low.

In relation to outsourcing cleaning services, the Bank's approach varies by location. For our Sydney head office, cleaning services are provided through our property and facilities management provider, which maintains its own modern slavery statement specifically addressing cleaning sector risks. The provider conducts its own modern slavery due diligence over cleaning contractors, with controls that address sector-wide risks such as undisclosed subcontracting, non-compliance with minimum wage requirements, inadequate employment documentation, excessive working hours, and the use of vulnerable worker groups. Given the scale of our head office operations, we consider this oversight to be particularly important.

In relation to outsourcing staff canteen and food catering service, these are provided at our Sydney head office by an external service provider. According to the provider, the provider does not outsource any part of the service, does not use contract, seasonal or low-skilled migrant labour, and provides all workers with written employment terms in a language they understand, with interpreters available where needed. The provider maintains a whistleblowing mechanism to encourage the reporting and investigation of modern slavery concerns, and operates a transparent payroll system that ensures workers receive their full legal entitlements with clear pay records. Based on these controls and the direct employment of workers by the service provider, we assess the modern slavery risk associated with our catering services as low.

ACTIONS TAKEN TO ADDRESS RISKS

To minimise the risk of modern slavery in our supply chains, we have implemented risk management processes to assist in identifying and monitoring potential risk areas. In particular, the Bank has established a modern slavery due diligence process for new supplier relationships.

During 2025, the Bank has continued to implement steps and measures to mitigate the risk of slavery and human trafficking in its business and supply chains, including:

(a) Continuing to apply a modern slavery due diligence process. The due diligence process has been incorporated into the Bank's existing on-boarding and procurement processes, with new suppliers being required to complete a modern slavery questionnaire or provide the Bank with their modern slavery statements if their contract prices (whether on a once-off or annual accumulated basis) exceed a specified monetary threshold, with responses reviewed and modern slavery risk rating assessed to ensure that the Bank does not engage with suppliers whose conduct are unlawful or unethical. Existing suppliers are re-screened if they provide additional goods and services where their contract prices as described above exceed a specified monetary threshold.

In addition to these measures, the Bank has undertaken targeted actions in respect of its cleaning and catering services during the reporting period. For cleaning services, the Bank has reviewed its property and facilities management provider's modern slavery statement to assess the adequacy of controls over cleaning contractors. For catering services, the Bank conducted enhanced due diligence during the contract renewal process, including obtaining the catering provider's updated modern slavery questionnaire in early 2026.

(b) Continuing to ensure that new and renewed supplier contracts contained clauses relating to the prevention of modern slavery and human trafficking, where appropriate.

(c) Continuing to provide guidance and training on modern slavery to the Bank's staff, with such training compulsory to staff in procurement departments, including updating of internal modern slavery guidance, which provides clear roles and responsibilities for the departments and units of the Bank to, amongst others, communicating clearly the Bank's stance on modern slavery in its on-boarding and procurement process, conduct modern slavery due diligence and risk assessments on suppliers, and make timely reports of any occurrence or potential occurrence of modern slavery conduct in the supply chain.

(d) Continuing to adopt a robust anti-slavery stance at the highest level. For example, both BOC Aus' Board and BOC SB's Senior Management have approved the Bank's annual statement which confirms the Bank's commitment to mitigating the risk of modern slavery and human trafficking in our business and supply chains.

(e) The Bank maintains grievance mechanisms through which staff and suppliers can report concerns regarding modern slavery. This includes the Bank's whistleblower channel, which is available to employees and external parties, and through which any concerns relating to modern slavery conduct may be raised confidentially. During 2025, no reports relating to modern slavery were received through the Bank's whistleblower channel.

During 2025, the Bank has not identified or been made aware of any instances of modern slavery in its operations or supply chains. No matters were referred for remediation during the reporting period. Should any instance of modern slavery be identified, the Bank's internal Modern Slavery Guidance sets out a process for investigation and remediation, including engagement with affected persons and referral to relevant authorities where appropriate.

ASSESSING EFFECTIVENESS

The Bank continues to measure the effectiveness of the steps taken to assess and address the risk of modern slavery, using a combination of qualitative and quantitative indicators. The Bank monitors the implementation and effectiveness of its actions through its supplier management and procurement process as required under the Bank's internal Modern Slavery Guidance, which includes supplier due diligence through risk assessment, periodic review of supplier modern slavery questionnaire responses and tracking completion rates of modern slavery training. Oversight of the Bank's modern slavery process is provided by BOC Aus' Board and BOC SB's Senior Management, with the effectiveness of the Bank's actions reviewed as part of the annual statement approval process. The Bank will continue to take a continuous improvement approach to its response to modern slavery, including by reviewing its risk assessment methodology and expanding supplier engagement as its understanding of modern slavery risks evolves.

CONSULTATION

As explained above, BOC SB and BOC Aus share the same premises and have joint functional support services such as personnel, treasury and operational resources under an outsourcing arrangement between BOC SB and BOC Aus, with BOC SB being the service provider. This statement was prepared by the Bank in consultation with the relevant business units of both BOC Aus and BOC SB, including through cross-functional engagement across procurement, compliance and operational teams, taking into consideration both BOC Aus and BOC SB's operations and supply chains.

OUR COMMITMENT ON MODERN SLAVERY

The Bank is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to mitigate the risk that modern slavery is taking place in its own business or in any of its supply chains. Furthermore, all our staff must adhere to our Code of Conduct which is based on the Bank's values. Although this does not mean that we can guarantee that the entire supply chain is free from slavery and human trafficking at all times.

CONCLUSION

This statement is made pursuant to Part 2 of the Act and constitutes BOC Aus and BOC SB's Modern Slavery statement for the financial year ending December 2025. This joint statement has been approved by the Board of BOC Aus and signed by a director of BOC Aus.

A joint statement has been prepared and approved under sections 14(2)(d)(iii) and (e)(iii) of the Act by the Board of BOC Aus, because it is not practicable to comply with the other approval options due to the complex governance structures of the Bank. BOC SB and BOC Aus work closely together and share many policies and processes. The senior management of BOC SB have been fully consulted in the preparation of this statement and adopt its content.

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Professor the Hon Stephen Martin
Chairman
Bank of China (Australia) Limited
Date: 18 June 2026