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Anti-Bribery & Corruption Policy

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A. Objective

1. The objective of this Anti-Bribery and Corruption Policy is to set out Link's standards in relation to the prevention of bribery and corruption, and to provide guidance to all relevant parties on the compliance with applicable Relevant Laws and Regulations as referred to in Part G of this policy ("Policy").

B. Policy Scope

2. This policy applies to all Link employees ("Employee(s)").

C. Policy Statement

3. Link has a strict zero tolerance policy against Bribery and Corruption. These are unlawful and are strictly prohibited in every jurisdiction in which we operate. Employees are expected to act with integrity, honesty and in full compliance with the Relevant Laws and Regulations.

D. Corruption & Bribery

4. "Corruption" is a broad concept of one's abuse of power or position for private gain which can include Bribery, fraud, misuse of authority, collusion etc.
5. The terms "Bribe" or "Bribery" mean the offering, promising, giving, accepting, or requesting anything of value, directly or indirectly, to influence a decision, gain an improper advantage, or induce the improper performance of a duty. Bribery takes many forms and includes the direct or indirect offer, provision or acceptance of the following: -
 - 5.1 gifts, loans, fees, rewards, or commissions (in the form of cash, securities, property, or interests in property);
 - 5.2 business hospitality (e.g., travel, lodging, and entertainment expenses);
 - 5.3 offers of employment, internships, or contracts;
 - 5.4 debt relief (e.g., payment, release, or liquidation of a loan or other liability);
 - 5.5 favours (e.g., protection from penalties or legal proceedings);
 - 5.6 discounts or commissions on fees;
 - 5.7 kick-backs; and/ or
 - 5.8 promises of any of the above as well as facilitation payments (see below).

6. A Bribe is not limited to large sums or extravagant gifts; even small items can be considered bribery if the intent is improper influence.

7. The term “facilitation payment” (sometimes referred to as grease payments or kickbacks) refers to unofficial sums paid to public officials to expedite routine government actions including but not limited to: -
 - 7.1 accelerating the processing of licences, permits, or other official documents;
 - 7.2 expediting visa or work order approvals;
 - 7.3 securing faster or easier clearance through customs; and/ or
 - 7.4 providing utilities (e.g., electricity, water).

8. Whilst a facilitation payment is usually directed to speed up a process, it is still considered a Bribe as it is aimed to influence a decision.

E. Standards of Conduct

9. Employees must never engage in any form of bribery, corruption, or facilitation payments (including grease payments or kickbacks). For avoidance of doubt, Employees are strictly prohibited from offering, accepting and/or authorising any advantage/ sum/ Bribe to any individual or entity that would: -
 - 9.1 improperly influence a business decision, gain an unfair advantage or induce improper performance of a duty;
 - 9.2 encourage or reward actions that are dishonest, improper, unlawful, unethical or constitute breach of trust;
 - 9.3 create an expectation or obligation on the recipient to provide preferential treatment;
 - 9.4 secure, retain or obtain other business preference or advantage;
 - 9.5 make contributions to political parties or officials to obtain or retain business or gain any unfair advantage;
 - 9.6 make any payment to a third party knowing or having reasons to suspect that any portion of the payment may be used for bribery.(collectively “Prohibited Conduct”)

10. There are no exceptions to the Prohibited Conduct referred to above, even if local customs suggest otherwise.
11. For avoidance of doubt, any attempt to engage in the Prohibited Conduct is unlawful and strictly forbidden even if the attempt is declined or proof ineffective. A mere attempt can result in serious consequences for both the Employee and Link.
12. If an Employee is asked to engage in the Prohibited Conduct the following steps should be taken:
 - 12.1 immediately refuse to carry out the Prohibited Conduct;
 - 12.2 clearly explain that Link has a strict policy prohibiting the Prohibited Conduct; and
 - 12.3 explain that violating these Prohibited Conduct would jeopardise the Employee's own position within Link; and
 - 12.4 report the matter in documentation via e-mail to your direct supervisor, Head of Department and Compliance Department.

F. Third Parties

13. No Employee may make payment to a third party knowing or suspecting that the same be used for any of the Prohibited Conduct as doing so may also constitute Bribery and/or Corruption.

G. Relevant Laws, Regulations and Penalties

14. All Employees are required to comply with the laws and regulations of their respective jurisdiction ("Relevant Laws and Regulations") including but not limited to: -
 - 14.1 Hong Kong Prevention of Bribery Ordinance (Cap. 201);
 - 14.2 Australia Criminal Code Act 1995;
 - 14.3 PRC Criminal Law (中华人民共和国刑法), PRC Anti-Unfair Competition Law (中华人民共和国反不正当竞争法);
 - 14.4 Singapore Prevention of Corruption Act 1960; and
 - 14.5 UK Bribery Act 2010.

15. Penalties are severe and differ across jurisdictions. In Hong Kong, under the Prevention of Bribery Ordinance, an offence can result in up to 7 years imprisonment and up to HKD500,000.

H. Violations

16. Violating this Policy, directing others to violate this Policy or failing to report breaches may result in disciplinary action, including termination and potential civil or criminal liability. Breaches may be reported via the required escalation protocol.
17. Non-compliance exposes Link to serious legal, financial, and reputational risks, including investigations, loss of business opportunities, and damage to stakeholder trust.
18. Link reserve the right to report violations to regulators or law enforcement authorities where appropriate and/or as required by regulations/laws.
19. Link may terminate relationships with third parties, contractors, or service providers who breaches the Relevant Laws and Regulations for bribery and corruption.