

WORLD-LINK LOGISTICS (ASIA) HOLDING LIMITED

(Incorporated in the Cayman Islands with limited liability)
(Stock Code: 6083)

ANTI-CORRUPTION POLICY

Effective date: 1 January 2022

The Policy outlines that the Company and its subsidiaries (collectively the “Group”) values its reputation for ethical behaviour and for financial probity and reliability. The Group recognises that bribery and corruption are damaging to its legitimate business interests. More broadly, bribery undermines the rule of law and poses serious threats to sustained economic progress in developing and emerging economies and to the proper operation of free markets. The Company is listed in Main Board of The Stock Exchange of Hong Kong Limited and its major subsidiaries conduct business mainly in Singapore and is committed to doing so with fairness, honesty, openness, and integrity.

The Group is therefore committed to the highest standards of compliance with financial crime law and regulation, which includes the detection and prevention of money laundering, terrorist financing, sanctions, bribery and corruption, market abuse, fraud and data breaches (including identity theft), and other criminal acts (collectively referred to as “financial crime”).

The Group has a zero tolerance approach to bribery and corruption and expects all Associated Persons to exhibit the same approach. The Group is committed to implementing and enforcing effective systems and controls to counter, monitor for, and prevent bribery and corruption by:

- Upholding all laws relevant to countering bribery and corruption in every jurisdiction in which it operates, in particular the Prevention of Bribery Ordinance in Hong Kong and the Legal Regime to Prevent and Suppress Bribery in the Private Sector in Macau;
- Setting out a clear anti-bribery and corruption policy and proportionate and effective antibribery and corruption procedures;
- Carrying out appropriate due diligence on third parties that conduct business with the Group;
- Training employees and other relevant persons on internal and external anti-bribery and corruption obligations so that they can recognise and avoid the use of bribery or corruption by themselves and others;
- Requiring employees to be vigilant and to report any suspicion of bribery or corruption, providing them with suitable channels of communication, and ensuring sensitive information is treated appropriately;

- Implementing and enforcing effective systems to monitor and prevent bribery in accordance with the law;
- Rigorously investigating instances of alleged or confirmed bribery or corruption, notifying the relevant authority regarding potential or confirmed instances of bribery or corruption (as appropriate), and assisting the police and other relevant authorities in any resulting prosecution; and
- Taking a firm and vigorous action against any Associated Persons involved in bribery or corruption or who do not support anti-bribery and corruption requirements.

General

This Policy applies to all Associated Persons of the Group. An “Associated Person” is anyone who performs services for or on behalf of the Group.

Offences

There are a number of offences under the Prevention of Bribery Ordinance in Hong Kong and the Legal Regime to Prevent and Suppress Bribery in the Private Sector in Macau, each aimed at sanctioning the provision or receipt of bribes at every stage. All Associated Persons should refer to the Prevention of Bribery Ordinance in Hong Kong and the Legal Regime to Prevent and Suppress Bribery in the Private Sector in Macau for details of these offences.

Requirements & Compliance

All Associated Persons are prohibited from directly or indirectly:

- Offering, promising, giving, requesting, accepting, or agreeing to receive a bribe of any kind, in any form;
- Offering, promising, or transferring anything of value to a public official in order to influence the public official and obtain or retain business, or to obtain or retain an advantage for any Associated Person including offers, promises, or transfers to any third party, such as a family member, agent, or legal entity, in order to influence a public official; and
- Making a payment, offer, request, acceptance, or promise of anything of value to:
 - a) public officials;
 - b) political parties or party officials;
 - c) candidates for political office;
 - d) any other person while knowing that such person will pass the payment, offer, or promise to any of the above; or
 - e) private individuals or legal entities

with or without corrupt intent for the purpose of:

- a) influencing an official or private individual's (or legal entity's) act or decision;
- b) inducing a person to do or omit to do acts in violation of his or her official duty;
- c) inducing that person to use his or her influence with a government to affect or influence any government decision or action; or
- d) securing an improper advantage

to assist in obtaining or retaining business;

- Aiding, abetting, or counselling of any of the above prohibited payments; and
- Accepting or providing advantage in relation to any non-governmental third party with a value in excess of HK\$500, or equivalent local currency, without the approval of their line manager and must ensure that it is solely for the purpose of cultivating or enhancing a business relationship. Advantage in excess of HK\$500, or equivalent local currency, from any one source per calendar year require your line manager's approval and advantage in excess of HK\$500, or equivalent local currency, from any one source per calendar year will, in addition, require the approval of Chief Executive Officer. (If two individuals from one company offer a staff member separate advantage in one calendar year, the value of the advantage must be added together to determine whether line manager or Chief Executive Officer approval is required. For avoidance of doubt, in this instance, the "source" of the advantage would be the company, not the two individuals offering the advantage.)

"Advantage" includes money, gifts, loans, commissions, offices, contracts, services, favours and discharge of liability in whole or in part, but does not include entertainment.

"Entertainment" means the provision of food or drink, for consumption on the occasion when it is provided, and of any other entertainment provided at the same time, for example singing and dancing.

It is important to note that a corrupt act does not need to succeed in its purpose to violate this Policy.

All Associated Persons are required to adhere to this Policy and any reporting requirements herein. Additionally when adhering to this Policy, Associated Persons should take into consideration and abide by all applicable anti-bribery and corruption legislation and regulations including but not limited to those in their local jurisdiction.

Reporting

The Group expects all Associated Persons who have concerns about any aspect of the Group's business or any other concerns, such as cases of suspected unethical or unlawful behaviour, to come forward and voice those concerns openly, confidentially, or anonymously.

Should an Associated Person select to voice their concerns or find themselves in a situation of a possible breach of this Policy, the Associated Person should follow the instruction in Whistleblowing Policy to contact the corresponding person.

Recordkeeping

In accordance with this Policy, and all relevant laws and regulations, the Group maintains detailed, accurate, and proper books, records, and financial reporting, which properly reflect the substance of corporate payments and transactions, including payments to third parties. All accounts, invoices, memoranda and other documents and records relating to dealings with third parties must be prepared and maintained with strict accuracy and completeness.

Monitoring & Review

The board (the "Board") of directors of the Company will monitor the effectiveness and review the implementation of this Policy on an annual basis considering its suitability, adequacy and effectiveness. Improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

The Chief Executive Officer will report to the Board on its monitoring of the Policy and any breaches of the Policy and submit to the Board any proposed amendments to the Policy.

All Staff are responsible for the success of this Policy and should ensure they use it to disclose any suspected breach or wrongdoing.

Staff are invited to comment on this Policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Chief Executive Officer who will communicate this to the Board.

NOTE: This document has been translated into Chinese. In case of discrepancies between the English version and Chinese version, the English version shall prevail