

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

1. Introduction

Alpina holdings Limited ("Alpina" or the "Company", Alpina and its subsidiaries collectively known as the "Group") is dedicated to conducting its business and operations with honesty and ethical conduct.

2. Background

The Group strictly upholds a zero-tolerance policy against bribery and corruption. We are committed to conducting all our business dealings and relationships with professionalism, transparency, fairness, and integrity. Additionally, we implement and enforce robust systems to prevent and counteract bribery and corruption.

3. Scope

This Policy applies to all employees (full and part-time), contract workers, consultants, officers and directors of the Group.

4. Objective

Define the responsibility of the Group and its employees in upholding their stances against bribery and corruption.

Promote a culture of integrity, honesty and openness among the Bank's employee.

4. Definition

BRIBERY

The act of corruptly authorising, giving, agreeing to give, promising, offering, soliciting, receiving, or agreeing to receive any gratification

CORRUPTION

The act of giving or receiving of any gratification or reward in the form of cash or in kind of high value for performing task in relation to his/her job description

GIFTS

Any items of value or benefits exchanged at no cost.

CONFLICTS OF INTEREST

When a person's own interests either influence, have the potential to influence, or are perceived to influence their decision making of the Group

FACILITATION PAYMENT

A payment or other provision made personally to an individual in control of a process or decision. It is given to secure or expedite a routine or administrative duty or function.

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5. Anti-Bribery and Corruption Policy

The Group strictly prohibits any form of bribery or corruption.

You are prohibited from offering, seeking, accepting, or providing personal payments, gifts, or favours to gain an unfair advantage in business dealings. You are expected to abide by all anti-bribery and corruption laws applicable to both yourself and the Group, with Singapore's laws applicable worldwide.

Engaging in bribery or corruption may result in severe consequences including disciplinary actions, termination, legal repercussions, and potential imprisonment.

It is your responsibility to ensure that everyone you work with comprehends and upholds the policy against bribery and corruption.

6. Gifts and Entertainment

We manage the giving and receiving of gifts and entertainment carefully to mitigate the risk of bribery or corruption. We only exchange gifts and entertainment that are occasional, reasonable, and customary in business relationships. We avoid gifts or entertainment that could influence decision-making, provide improper advantage, resemble a bribe in any way, or involve cash-like items such as prepaid cards or gift cards convertible to cash

7. Donation and Sponsorship

Donation and Sponsorship are never used as a disguise for bribes or to gain inappropriate business advantages. Before engaging in these activities, we conduct risk-based due diligence and monitor the appropriate utilization of our funds or resources

8. Facilitation Payments

The Group strictly prohibits 'facilitation payments', which are unofficial payments offered to public or government officials. Employees and third parties should refrain from making such payments on behalf of the organization. When uncertain about a payment's classification, employees must seek approval from senior management before proceeding.

9. Political contributions

The Group do not contribute funds or resources to any political campaign, party, candidate, or affiliated organization to avoid influencing the political process through improper means.

10. Reporting of Bribery and Corruption

The Group provides multiple channels for reporting bribery and corruption acts. Employees, directors, shareholders, customers, consultants, vendors, contractors, and anyone with a business relationship with the bank can report such acts through the following channels:

i) via postal mail marked "Private & Confidential" to the following:

The Audit Committee Chairman

54 Senoko Road
Woodlands East Industrial Estate
Singapore 758118

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ii) via email to Audit Committee Chairman at AlpinaACC@gmail.com

11.Review

This Policy will be updated, amended or revised from time to time to ensure its adequacy in implementation and enforcements.