CHILLON
TRADING LIMITED

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Policy Statement on Bribery and Facilitation Payments

CHILLON TRADING LIMITED is committed to prohibiting bribery in all business practices and transactions carried out by the Company or on its behalf by business partners, in accordance with the Prevention of Bribery Ordinance (Cap. 201) and RJC Code of Practices (COP) 2024 Provision 11 (Bribery and Facilitation Payments).

A. Prohibition on bribery. CHILLON TRADING LIMITED will not offer, solicit, accept, or countenance any payment, gift in kind, hospitality, expense, or promise of advantage that may compromise the principles of fair competition, or that constitutes an inducement or reward for obtaining or retaining business, directing business to any person, or influencing any business or governmental decision-making process. This applies equally to dealings with public officials and private-sector counterparties, consistent with sections 4 and 9 of the Prevention of Bribery Ordinance, which prohibit both the offering and soliciting of an advantage to or by a government officer or private agent without lawful authority or the principal's permission.

B. Risk assessment and monitoring. CHILLON TRADING LIMITED identifies and monitors areas of its business, including dealings by employees and agents, that pose a higher risk of bribery, and has developed appropriate systems to detect and prevent bribery based on this assessment.

C. Gifts and hospitality. Employees must record any gifts or hospitality offered to, or received from, third parties in accordance with Company procedure, and follow set approval criteria before offering or accepting any such gift.

D. Reporting and sanctions. Management facilitates the reporting of any incidents of attempted bribery, corrupt solicitation, or inappropriate gifts, including through the Company's confidential complaints and grievance mechanism. All reports will be investigated, and appropriate sanctions applied for bribery or attempted bribery in any form. Where warranted, matters may be referred to the Independent Commission Against Corruption (ICAC), the primary enforcement authority under the Prevention of Bribery Ordinance.

E. Non-retaliation. No employee will suffer demotion, penalty, or any other adverse consequence for raising a concern in good faith, or for refusing to pay a bribe or facilitation payment, even where this may result in the Company losing business.

F. Facilitation payments. Where facilitation payments are, in narrow circumstances, permitted under applicable law, CHILLON TRADING LIMITED will act to eliminate such

payments, or where elimination is not immediately possible, reduce their size and frequency, ensure they are of limited nature and scope, and account for them through internal controls.

CHILLON TRADING LIMITED.

Date: 04/02/2026