Anti-Bribery and Corruption Statement

Brillink Bank Corporation Limited (“Brillink Bank” or the “Bank”) is committed to conducting its business with integrity, transparency and accountability.

The Bank does not tolerate bribery or corruption in any form. This commitment applies to all members of the Bank’s governing bodies, employees and any person or organisation acting for or on behalf of the Bank. The Bank also expects its suppliers, service providers, consultants and other business partners to uphold equivalent standards of integrity and comply with applicable anti-bribery and anti-corruption laws.

Our commitment

Brillink Bank is committed to:

- complying with applicable anti-bribery and anti-corruption laws and regulatory requirements;
- maintaining appropriate controls designed to prevent, identify and address bribery and corruption risks;
- conducting business fairly, honestly and transparently;
- maintaining accurate and complete books, records and supporting documentation;
- assessing relevant corruption risks in its relationships with customers, suppliers, service providers, consultants and other third parties;
- providing employees with appropriate guidance and training on anti-bribery and anti-corruption requirements;
- enabling concerns to be raised in good faith without fear of retaliation.

Prohibited conduct

Brillink Bank prohibits its directors, employees, representatives and persons acting on its behalf from:

- offering, promising, giving, requesting or accepting a bribe or any other improper advantage;
- making facilitation payments, regardless of whether such payments may be considered customary in a particular jurisdiction or business environment;
- offering or accepting gifts, hospitality, entertainment or other benefits intended to improperly influence a decision or secure an unfair business advantage;

- using charitable contributions, sponsorships, donations, employment opportunities or other arrangements as a means of providing an improper benefit;
- making false, incomplete or misleading entries in the Bank's books and records;
- using third parties to perform any action that would be prohibited if performed directly by the Bank.

Gifts and hospitality

Reasonable and proportionate gifts and hospitality may be permitted where they serve a legitimate business purpose, are transparent, comply with applicable laws and internal requirements, and cannot reasonably be perceived as intended to influence a business decision.

Additional care is required in any interaction involving public officials. No gift, hospitality or other benefit may be offered to a public official for the purpose of obtaining or retaining business, influencing an official decision or securing any improper advantage.

Third parties

Brillink Bank expects its suppliers, contractors, consultants, agents, service providers and other business partners to conduct their activities ethically and in compliance with applicable anti-bribery and anti-corruption laws.

The Bank applies risk-based due diligence and appropriate contractual and monitoring measures in its relationships with third parties. Brillink Bank reserves the right to reconsider or terminate a business relationship where bribery, corruption or related misconduct is identified or reasonably suspected.

Raising concerns

Employees and external parties are encouraged to report any actual or suspected bribery, corruption, unethical conduct or other violation of applicable law or the Bank's standards.

Reports made in good faith will be treated seriously and, to the extent permitted by law, confidentially. Brillink Bank does not tolerate retaliation against any person who raises a concern in good faith or assists with a related review or investigation.

Concerns may be reported through the Bank's designated reporting channel:

Email: complaint@brillinkbank.com

Governance

Brillink Bank maintains internal policies, procedures and controls supporting the implementation of its anti-bribery and anti-corruption framework. The framework is subject to oversight, monitoring and periodic review to ensure that it remains appropriate for the Bank's activities and risk profile.

This Statement summarises Brillink Bank's public commitment to preventing bribery and corruption. It does not replace the Bank's internal policies, procedures or applicable legal and regulatory requirements.