



**KARPEN
PARTNERS**
Strategic Introductions

CODE OF CONDUCT (SUMMARY)

Last updated: April 6th, 2026

1. Purpose

1.1. This Code of Conduct sets out the principles and standards that guide the activities of Karpén Partners Pte. Ltd. ("Karpén Partners").

1.2. We are committed to conducting our business with integrity, professionalism, and respect for applicable laws and standards.

2. Integrity and Ethical Conduct

2.1. Karpén Partners acts with honesty and integrity in all interactions.

2.2. We do not engage in misleading, deceptive, or unethical practices and seek to maintain fair and transparent dealings with all parties.

3. Professional Behavior

3.1. We conduct ourselves in a professional and respectful manner in all communications and engagements.

3.2. We aim to build long-term, trust-based relationships with counterparties.

4. Compliance with Laws and Regulations

4.1. Karpén Partners seeks to comply with all applicable laws and regulations.

4.2. We do not knowingly engage in activities that would require regulatory authorization where such authorization is not held.

5. Confidentiality

5.1. We respect the confidentiality of non-public information and handle such information responsibly.

5.2. Please refer to our Confidentiality Statement for further details.



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6. Conflicts of Interest

6.1. Karpén Partners seeks to identify and manage conflicts of interest appropriately.

6.2. We refer to our separate Conflicts of Interest Policy for detailed procedures.

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7. Anti-Bribery and Corruption

7.1. We maintain a zero-tolerance approach to bribery and corruption.

7.2. We refer to our separate Anti-Bribery & Corruption Statement for detailed procedures.

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8. Counterparty Expectations

8.1 We expect the same high standards of integrity from all counterparties.

8.2 We reserve the right to decline or terminate any introduction where we have reasonable concerns regarding unethical conduct, bribery, corruption or non-compliance with applicable laws.

8.3. We seek to engage with counterparties who act with integrity and professionalism.

9. Responsibility and Accountability

9.1. Karpén Partners takes responsibility for its actions and decisions.

9.2. Any employee or counterparty may raise concerns confidentially with:

compliance@karpenpartners.com.

9.2. Concerns or complaints may be raised in accordance with our Complaints Procedure.



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10. Continuous Improvement

10.1. We seek to continuously improve our practices and standards in line with evolving expectations.

10.2. This Code of Conduct is reviewed annually by the Director.

11. Contact

11.1. For any questions relating to this Code of Conduct, please contact:

Compliance - Karpen Partners Pte. Ltd.

Email: **compliance@karpenpartners.com**