KARPEN PARTNERS
Strategic Introductions

ANTI-BRIBERY AND CORRUPTION STATEMENT (SUMMARY)

Last updated: April 6th, 2026

1. Commitment

1.1. Karpen Partners Pte. Ltd. ("Karpen Partners") is committed to conducting its business with integrity, transparency, and in compliance with applicable anti-bribery and anti-corruption laws.

1.2. We maintain a zero-tolerance approach to bribery and corruption in any form.

2. Scope

2.1. This statement applies to all activities carried out by Karpen Partners and to all individuals acting on its behalf.

3. Prohibited Conduct

3.1. Karpen Partners does not:

- offer, promise, give, or authorize any form of bribe or improper advantage
- request or accept any bribe or improper benefit
- engage in facilitation payments or unofficial payments
- participate in any conduct intended to improperly influence a business decision

4. Gifts and Hospitality

4.1. Any gifts or hospitality, where appropriate, must be reasonable, proportionate, and not intended to influence decision-making.

4.2. Karpen Partners does not permit excessive or inappropriate benefits.

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5. Third Parties

5.1. Karpen Partners seeks to work with counterparties and partners who share similar standards of integrity.

5.2. We may decline to engage where there are concerns relating to unethical conduct or corruption risk.

5.3 In the context of business introductions, Karpen Partners does not accept or offer any form of inducement, kickback or success fee that could be perceived as influencing the fairness of the introduction.

6. Compliance with Laws

6.1. Karpen Partners seeks to comply with applicable anti-corruption laws, including Singapore's Prevention of Corruption Act (Cap. 241) and, where relevant, internationally recognized standards.

7. Reporting and Escalation

7.1. Any concerns relating to bribery, corruption, or unethical conduct may be reported to:

Compliance - Karpen Partners Pte. Ltd.
Email: **compliance@karpenpartners.com**

7.2. Reports will be handled confidentially and, where appropriate, escalated internally.

8. Consequences

8.1. Karpen Partners reserves the right to decline or terminate any engagement where bribery, corruption, or unethical conduct is suspected.

9. Record Keeping

9.1. All records relating to gifts, hospitality or concerns of bribery shall be retained for a minimum of five (5) years.

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10. Contact

10.1. For any questions relating to this statement, please contact:

Compliance - Karpen Partners Pte. Ltd.
Email: **compliance@karpenpartners.com**