



FIRST PACIFIC COMPANY LIMITED

第一太平洋有限公司

(Incorporated with limited liability under the laws of Bermuda)

Website: www.firstpacific.com

(Stock Code: 00142)

ANTI-BRIBERY AND CORRUPTION POLICY

This policy supports First Pacific's Code of Conduct (Code) and must be read in conjunction with the Code.

1. INTRODUCTION

First Pacific has a zero-tolerance approach to bribery and corruption. Common examples of corruption include: extortion, fraud, insider dealing, money laundering, kickbacks, and facilitation payments.

All forms of bribery and corruption are unacceptable and will not be tolerated. First Pacific staff must not act corruptly in their dealings with any other person and must ensure that any third party acting on First Pacific's behalf complies with our standards.

2. DEFINITIONS

Corruption is the misuse of public or professional power for personal gain.

Bribery refers to the offering, giving, soliciting, or receiving of any item of value as a means of influencing the actions of an individual holding a public or legal duty. This type of action results in matters that should be handled objectively being handled in a manner best suiting the private interests of the decision maker. Bribery constitutes a crime and both the offeror and the recipient can be criminally charged.

A facilitation payment is akin to a bribe. It is a financial payment that is made with the intention of expediting an administrative process. It is a payment made to a public or government official or counterparty that acts as an incentive for the official to complete some action or process expeditiously, to the benefit of the party making the payment.

3. POLICY

Neither First Pacific nor its staff may give or receive, whether directly or indirectly, bribes or other improper advantages such as facilitation payments for business or personal gain. This includes to or from any individual person, any government official or any organization, corporate or otherwise. Neither First Pacific nor its staff may participate in any form of corruption including but not exclusive to: extortion, fraud, insider dealing, money laundering, kickbacks, and facilitation payments.

First Pacific staff may not directly or indirectly, offer or give, or request or receive any gift or payment which is, or may be construed as being, an attempt to influence decisions related to First Pacific's business.

Hospitality and gifts may be offered and received only in the normal course of business and should not be seen to generate any actual or perceived conflicts of interest. Any hospitality or gifts should not be excessive or regular.

Any demand for or offer of a bribe must be rejected immediately and reported to the Chair of the First Pacific Audit and Risk Management Committee as described in Section 6 "Procedure" of the First Pacific Whistleblowing Policy.

In cases when bribery, facilitation payment or other corruption is deliberately concealed or continues after it is discovered, disciplinary action may be invoked up to and including termination.

Dated 10 December 2020

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