

Code of Conduct

Policy Ref	Version
AL-POL-COC-007	v1.0

1. Purpose and Statement of Values

- 1.1. AsiaLink is committed to maintaining the highest standards of ethics, integrity, and corporate governance in all of its business activities. This Code of Conduct (“Code”) sets out the standards of behaviour expected of all Personnel and reflects AsiaLink’s values of accountability, transparency, and fairness.
- 1.2. This Code is aligned with the principles of the UK Corporate Governance Code 2018 and has been adapted to the specific operational context of AsiaLink as a cross-border sourcing and market-entry bridge between Greater China and South-Eastern Europe.
- 1.3. AsiaLink’s commercial activities span multiple jurisdictions, including Hong Kong SAR, Mainland China, Taiwan, Greece, and other South-Eastern European markets. Personnel must be mindful that standards of conduct do not diminish when operating away from AsiaLink’s base, or when working with counterparties in jurisdictions with different legal or cultural norms.
- 1.4. This Code is not exhaustive. Where a situation is not addressed by this Code, Personnel are expected to act in a manner consistent with its spirit and to seek guidance from the CEO where in doubt.

2. Scope and Application

- 2.1. This Code applies to all directors, officers, employees, secondees, interns, and contractors of Ambrosia Holdings Limited and its venture AsiaLink (“Personnel”), wherever located and regardless of seniority or the nature of their engagement.
- 2.2. This Policy applies to all activities conducted on behalf of AsiaLink, including those conducted by third parties acting in AsiaLink’s name or on its behalf.
- 2.3. Where local law imposes more stringent requirements, the more stringent requirement shall apply. Where local law permits conduct that this Policy prohibits, this Policy shall prevail.

3. Corporate Governance and Legal Compliance

- 3.1. **Compliance with Laws** — All Personnel must comply with all applicable laws and regulations in the jurisdictions in which they operate. This includes, without limitation: the Companies Ordinance (Cap. 622, Laws of Hong Kong); the Employment Ordinance (Cap. 57, Laws of Hong Kong); the Personal Data (Privacy) Ordinance (Cap. 486, Laws of Hong Kong); the Prevention of Bribery Ordinance (Cap. 201, Laws of Hong Kong); applicable EU laws and regulations when operating within or on behalf of EU counterparties; and all relevant laws in Greater China.
- 3.2. **Transparency and Record-Keeping** — Personnel must maintain accurate and complete records of all business activities, transactions, and decisions. No false, misleading, or incomplete entries may be made in any record. Decision-making processes must be documented and auditable.
- 3.3. **Risk Management** — Personnel must identify and report risks in their areas of work, with particular attention to legal compliance, sanctions exposure, supply chain integrity, counterparty due diligence, and cybersecurity.

4. Ethical Conduct

- 4.1. **Integrity and Honesty** — Personnel must act with integrity and honesty in all business dealings. AsiaLink enforces a zero-tolerance policy on bribery, corruption, fraud, and dishonest conduct of any kind. Personnel must refer to the Anti-Bribery & Anti-Corruption Policy (AL-POL-ABC-001) for detailed obligations.
- 4.2. **Conflicts of Interest** — Personnel must disclose any actual, potential, or perceived conflict of interest promptly to the CEO. Personnel must not make decisions where their personal interests or the interests of a Connected Person conflict with the interests of AsiaLink. Full obligations are set out in the Conflict of Interest Policy (AL-POL-COI-002).
- 4.3. **Fair Competition** — Personnel must compete ethically and in compliance with all applicable competition and antitrust laws in all operating jurisdictions. Personnel must not engage in or facilitate price-fixing, market allocation, bid-rigging, or any other anti-competitive conduct.
- 4.4. **Confidentiality** — Personnel must protect AsiaLink’s confidential information and the confidential information of clients, suppliers, and partners, and must not use such information for personal benefit. Personnel must refer to their individual confidentiality agreements and the Data Protection & Privacy Policy.
- 4.5. **Use of AsiaLink’s Assets** — Personnel must use AsiaLink’s assets, resources, time, and relationships solely for legitimate business purposes. Personal use of AsiaLink’s assets is not

permitted without the CEO's prior written authorisation.

5. Respect for People and Human Rights

- 5.1. **Equal Opportunity and Non-Discrimination** — AsiaLink promotes a workplace that values diversity and inclusion. Personnel must not discriminate against, harass, or treat unfairly any colleague, client, supplier, or third party on the basis of race, ethnicity, gender, age, religion, disability, sexual orientation, or any other protected characteristic under applicable law.
- 5.2. **Safe and Respectful Workplace** — Personnel must contribute to a safe, respectful, and professional working environment. Bullying, harassment, intimidation, and any conduct that demeans or undermines a colleague will not be tolerated.
- 5.3. **Health and Safety** — Personnel must comply with all applicable health and safety laws and AsiaLink's health and safety protocols, and must report any unsafe conditions or incidents promptly.
- 5.4. **Human Rights in the Supply Chain** — In the course of sourcing activities in Greater China, Personnel must remain alert to human rights risks in the supply chain, including forced labour, child labour, and unsafe working conditions. Any concerns must be reported immediately to the CEO and documented for review.

6. Sanctions and Trade Compliance

- 6.1. Given AsiaLink's cross-border operations spanning multiple sanctions-sensitive jurisdictions, Personnel must comply strictly with the Sanctions & Trade Compliance Policy (AL-POL-STC-003). Personnel must not engage in, facilitate, or ignore any transaction that may involve a sanctioned party or restricted jurisdiction.

7. Environmental Sustainability

- 7.1. AsiaLink is committed to minimising its environmental impact and to encouraging responsible environmental practices throughout its supply chain and operations. Personnel must comply with all applicable environmental laws and must consider environmental impact in sourcing decisions, logistics arrangements, and supplier selection.
- 7.2. In sourcing and supplier management activities, Personnel should give preference, where commercially reasonable, to suppliers that demonstrate credible environmental management practices, including compliance with EU environmental regulations applicable to the products being sourced.

8. Community and Social Responsibility

- 8.1. AsiaLink recognises that its cross-border activities have an impact on communities in both Greater China and South-Eastern Europe. Personnel are expected to conduct all business activities in a manner that contributes positively to those communities and that upholds the social and environmental standards reflected in AsiaLink's supplier and partner policies.
- 8.2. Personnel are encouraged to support AsiaLink's corporate social responsibility initiatives as communicated by the CEO from time to time.

9. Relationship with Other Policies

- 9.1. This Code must be read alongside AsiaLink's full suite of policies, including:
 - 9.1.1. Anti-Bribery & Anti-Corruption Policy (AL-POL-ABC-001)
 - 9.1.2. Conflict of Interest Policy (AL-POL-COI-002)
 - 9.1.3. Sanctions & Trade Compliance Policy (AL-POL-STC-003)
 - 9.1.4. Data Protection & Privacy Policy
 - 9.1.5. IP & Brand Protection Policy
 - 9.1.6. Suppliers & Partners Code of Conduct (AL-POL-SPC-008)
 - 9.1.7. Quality Management Policy (AL-POL-QMP-009)
- 9.2. In the event of any conflict between this Code and a specific policy, the specific policy shall prevail in relation to its subject matter.

10. Reporting and Whistleblowing

- 10.1. All Personnel are required to report promptly any actual or suspected breach of this Policy to the CEO, or where the CEO is implicated, to the Board of Directors of Ambrosia Holdings Limited.
- 10.2. Reports may be made in confidence by email to asialink@am-ho.com marked "Private and Confidential — Policy Compliance". AsiaLink will not tolerate any retaliation against any person who makes a genuine report in good faith.
- 10.3. Failure to report a known or suspected breach is itself a breach of this Policy.

11. Consequences of Breach

- 11.1. Breach of this Policy by any Personnel may result in disciplinary action up to and including summary dismissal or termination of contract, and may be referred to the relevant law enforcement or regulatory authority.
- 11.2. AsiaLink reserves the right to recover any loss, damage, fine, or penalty suffered as a result of a breach of this Policy from the individual responsible.

12. Policy Governance and Review

- 12.1. This Policy is owned by the CEO of AsiaLink and approved by the Board of Directors of Ambrosia Holdings Limited.
- 12.2. This Policy shall be reviewed annually or sooner if required by changes in applicable law, regulatory guidance, or AsiaLink's business activities. Updates will be communicated to all Personnel promptly.
- 12.3. All Personnel are required to acknowledge receipt and understanding of this Policy upon commencement of engagement and upon each subsequent material revision.

ACKNOWLEDGEMENT OF RECEIPT AND UNDERSTANDING

I confirm that I have read, understood, and agree to comply with the AsiaLink Code of Conduct.

Full Name: _____ Position: _____

Signature: _____ Date: _____