


Sustainability Statement

CORE VALUE #3: INTEGRITY




GOVERNANCE

Upholding ethical business practices and high standards of ethics, integrity, and compliance

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CORPORATE GOVERNANCE

Target 16.6 Develop effective, accountable and transparent institutions at all levels



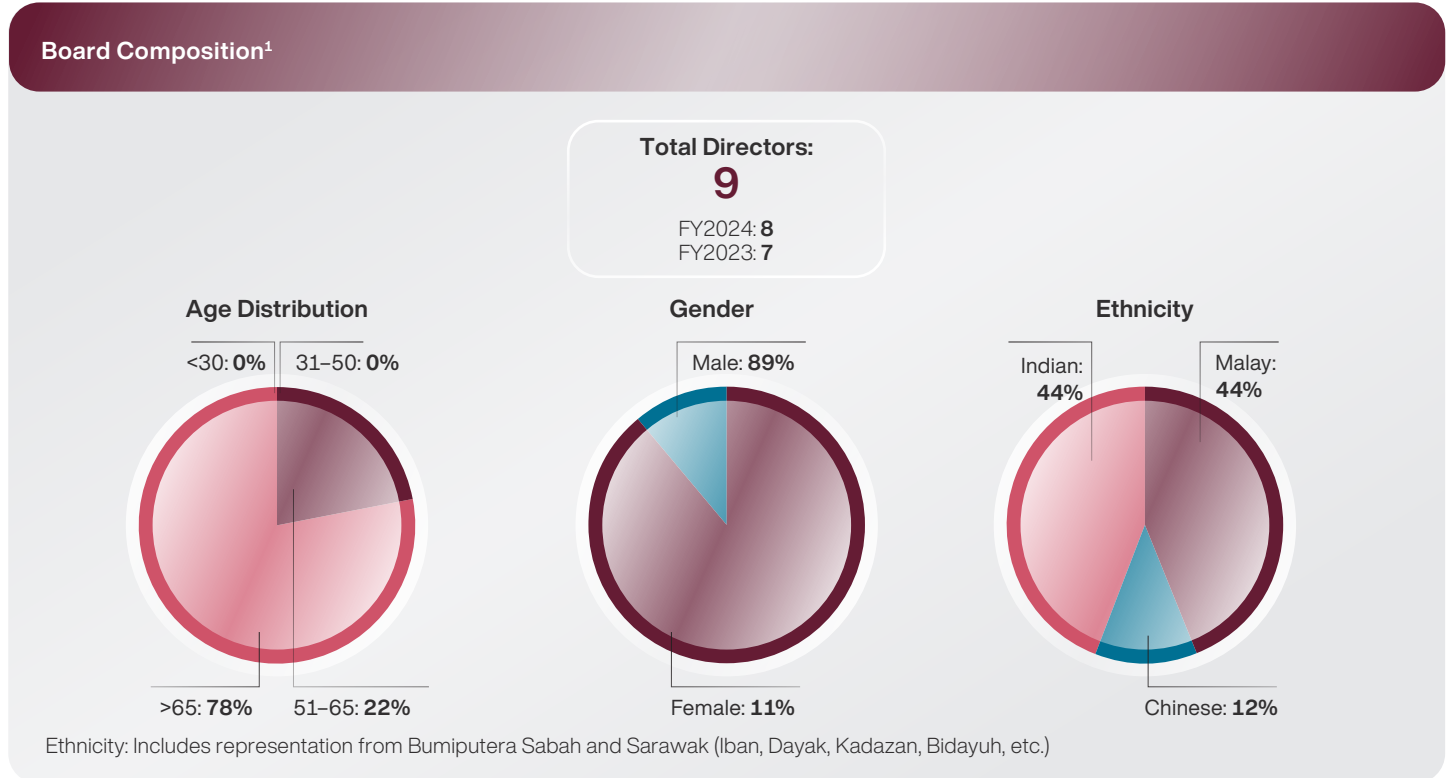
Why It Matters

We believe that upholding good corporate governance is crucial for safeguarding the multifaceted interests of our stakeholders and ensuring that our operations are conducted with integrity, transparency, and accountability. Our approach is guided by the principles outlined in the Malaysian Code on Corporate Governance, which emphasises board leadership, effective audit, and risk management and integrity in corporate reporting and meaningful relationships with stakeholders.

Our Approach

Board Leadership and Effectiveness

The Board provides strategic leadership, embedding EESG principles into its decision-making processes and promoting a culture of integrity that extends beyond compliance. The Board maintains a balanced and diverse composition and ensures that Directors stay informed of sustainability-related matters. This diversity strengthens governance and supports long-term value creation, enabling effective oversight of sustainability-related risks and opportunities.



Note:

¹ Board composition as of 26 March 2026.

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Effective Audit and Risk Management

The Board reinforces accountability by integrating climate-related and EESG risks into the Group's enterprise risk management framework, supported by robust internal controls and independent assurance processes. These measures ensure that sustainability-related risks are identified, assessed, and mitigated alongside financial and operational risks.

Further details on our Group's risk governance and internal control systems are disclosed in the Statement on Risk Management and Internal Control ("SORMIC") while the Audit Committee Report provides transparency on the Audit Committee's oversight of financial integrity and regulatory compliance.

Integrity in Corporate Reporting and Meaningful Relationship with Stakeholders

In fostering a meaningful relationships with stakeholders, we actively engage through structured dialogues and formal platforms such as General Meetings. In alignment with the NSRF and IFRS S1 and S2, our reporting approach addresses CRRO and SRRO, their impact on our business model, strategy and decision-making, as well as climate-related disclosures. This approach enhances transparency for stakeholders, including regulators, investors, customers, and employees, by providing relevant and decision-useful information on how these issues influence the Group's performance and long-term resilience.

Further details on our Group's corporate governance can be found in the Corporate Governance Overview Statement in the Annual Report.

Metrics, Targets, and Performance

Deleum has established metrics and targets, as incorporated in the Sustainability Roadmap, with their performance outlined below:

SUSTAINABILITY ROADMAP 2025-2029		
Sustainability Aspirations: Be a Future-ready Company for EESG by 2029		
Initiative	Metric / Target	Performance
Independent assurance for GHG emissions reporting	Obtain a statement of assurance for GHG data annually [#]	✔ Achieved (Verification Opinion Statement)
Adoption of IFRS S1 and S2	Integration of data from overseas operations for sustainability disclosures [#]	⚙️ Ongoing
	Full disclosure of CRRO, SRRO, and financial impacts by FY2028 [^]	⚙️ Ongoing
Incorporation of sustainability- and climate-related targets into the OKRs of Key Senior Management	5% weightage for the climate and sustainability-related OKRs [^]	✔ Achieved (Sustainability Governance)

Note:

[#] Metric aligns with GRI Standards (Disclosure 2: General Disclosure 2021)

[^] This metric is developed internally by Deleum

Sustainability Statement

BUSINESS ETHICS

Target 16.5 Substantially reduce corruption and bribery in all their forms



Why It Matters

Ethics, honesty, and integrity are the cornerstones of our approach to conducting business, helping us build trust, protect our reputation and ensure sustainable growth. We uphold the highest ethical standards across all dealings, safeguarding against legal, regulatory and financial risks while fostering investor confidence. Anchored by our COBC, this commitment strengthens governance, supports compliance, and underpins long-term resilience.

Our Approach

Deleum Code of Business Conduct



Anti-Bribery and Corruption



Gift and Hospitality



Donation and Sponsorship



Management of Third Parties



Financial Integrity



Political Activities



Money Laundering



Conflict of Interest



Corporate Asset



Confidential Information



Intellectual Property



Data Privacy & Protection



Anti-Competition



Public Disclosure



Whistleblowing



Human Rights



Harassment



Health, Safety & Environment



Responsibility Towards Customers and Principals



Discipline & Consequences

Sustainability Statement

We actively uphold ethical business practices, ensuring integrity, transparency, and full compliance with all applicable laws and regulations:

Policies and Procedures

Deleum has established the following:

- Code of Business Conduct
- Corporate Anti-bribery and Corruption Policy
- Anti-bribery Management System Policy
- Anti-bribery Management System Manual
- Anti-Money Laundering and Counter-Financing of Terrorism Guidelines
- Guidelines for Conflict of Interest
- Procedure for Gift, Hospitality, Donation and Sponsorship
- Guidelines for Third-party Anti-bribery and Corruption Management
- Whistleblowing Policy and Procedure

The commitment to prohibit bribery and corruption in the Group's business conduct is collectively overseen by the Board, BRIC, and MCRC. This encompasses the approval of relevant policies and a meticulous review process to ensure alignment with the Group's legal and ethical obligations.

ISO 37001:2016 Anti-bribery Management System

Deleum Berhad, Deleum Services Sdn. Bhd. and Deleum Technology Solutions Sdn. Bhd. were accredited with ISO 37001:2016 ABMS on 26 January 2024.

Zero Tolerance for Any Kind of Bribery and Corruption

Deleum adopts a zero-tolerance approach for any form of bribery or corruption, encompassing activities such as offering, soliciting or accepting bribes, double-dealing, illegal transactions, tampering with elections, kickbacks, money laundering and investor fraud. Any attempt or action that could compromise the integrity and accuracy of the Group's financial reporting is strictly prohibited.

Gift and Hospitality

We acknowledge that business goodwill is built through ethical conduct and professionalism. To proactively prevent any perception of corrupt conduct, we have established stringent restrictions through the Procedure for Gift, Hospitality, Donation, and Sponsorship.

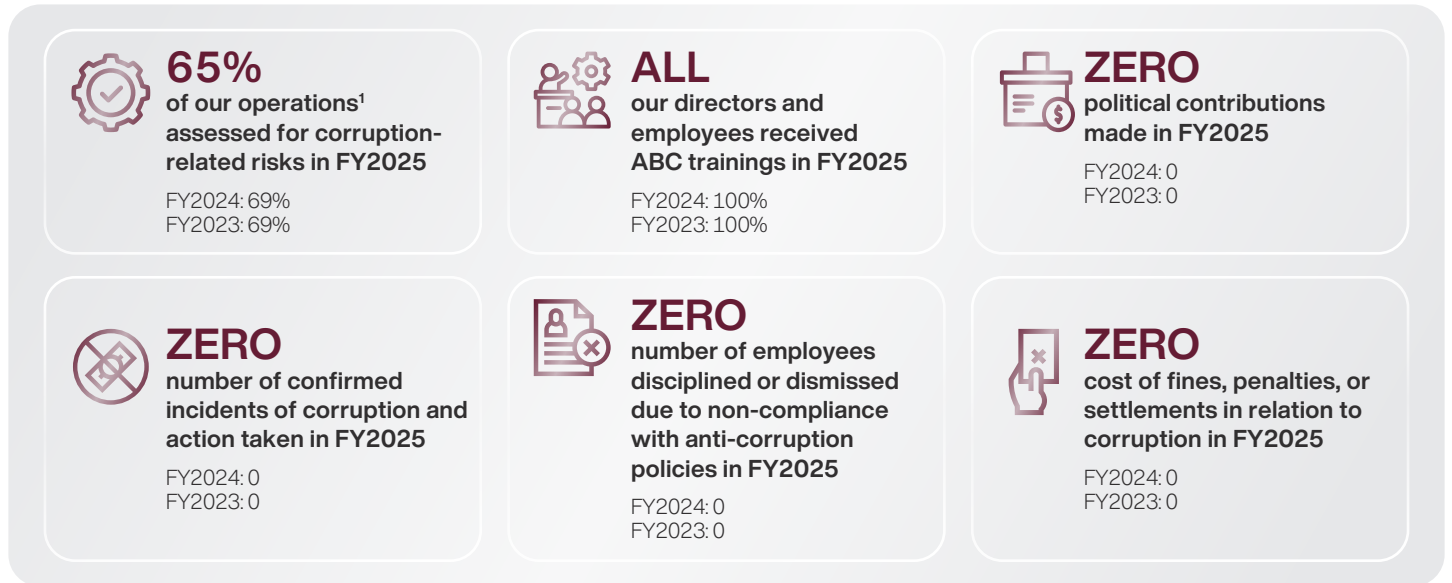
Apolitical Company

We maintain a nonpartisan stance, unequivocally prohibiting all donations to political parties, organisations, or their representatives. In the past three years, including FY2025, no contributions were made to any political parties, organisations, or their representatives.

Legal and Regulatory Compliance

We comply with not only the Malaysian laws and regulations but also the laws and regulations applicable in the location of the business activities, in particular with respect to ABC laws, rules, and regulations.

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Note:

1. Operation expanded in FY2025 due to acquisition in Indonesia.

Assessing Corruption and Due Diligence

We conducted thorough risk assessments at various levels, including Group, BU, and project. Additionally, due diligence assessments are performed before engaging new suppliers and contractors to ensure compliance with ethical standards and address corruption-related risks.

We identified specific areas with significant or high exposures to bribery and corruption risks covering areas such as COI, political relationships, government ties, potential corruption, money laundering, and financing of terrorism by:

- Identifying and implementing continuous improvements to enhance ABC policies and procedures through gap analysis and risk assessments
- Conducting an integrity awareness session during induction programmes for new employees, focusing on ABC-related matters
- Monitoring compliance on Gift, Hospitality, Donation, and Sponsorship transactions, with Compliance Champion conducting reviews and assessments, regularly reporting to MCRC, BRIC, and the Board
- Conducting periodic Corruption Risk Assessments ("CRA") guided by our ERM Framework including the Third-party Anti-bribery and Corruption Management Guidelines, consolidating into an enterprise-wide risk heat map regularly reviewed at the Group-wide level

To address significant or high risks of bribery and corruption, we have implemented a whistleblowing programme and investigation protocols. This entails engaging designated investigators and following a structured process, including case assessment, investigation planning, fact establishment, conducting the investigation, and reporting the results.

The following are the business areas with significant or high exposures to bribery and corruption risks (not listed in any particular order):



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Our goal is to ensure a fair, objective, unbiased, and impartial investigation on behalf of the Group, ensuring that there is no abuse of discretion, discrimination, capricious, or arbitrary decisions or actions during the process. Individuals with actual, perceived, or potential COI are prohibited from participating in the investigation or making judgment on corrective actions or appeal procedures.

Whistleblowing Mechanisms

Our whistleblowing mechanism allows employees, suppliers and the public to report any unethical conduct for investigation. Reports can cover various matters, including bribery, corruption, policy violations, harassment, misappropriation of assets and breaches of health and safety or environmental requirements. Whistleblowers' identities are kept confidential, can submit reports anonymously, and all reports are addressed without fear of reprisal. Currently, there are two channels to report concerns:

- whistle@deleum.com
The Whistleblowing Committee will have direct access to this email.

WBChairPerson@deleum.com
Only the Whistleblowing Committee Chairman will have direct access to this email.
- Letters / documents / reports (in sealed envelope with labelled "STRICTLY PRIVATE AND CONFIDENTIAL TO BE OPENED BY THE ADDRESSEE ONLY") to be address to:

Whistleblowing Committee Chairman,
C/o Corporate Secretarial Department,
Deleum Berhad
No. 2, Jalan Bangsar Utama 9,
Bangsar Utama,
59000 Kuala Lumpur.

Building a Culture of Integrity

By educating our stakeholders at all levels, from leadership to frontline employees, we reinforce adherence to ethical standards while fortifying our defences against the detrimental impacts of corruption. We aim to strengthen the culture of transparency, accountability, and ethical conduct, fostering trust among stakeholders and enhancing our resilience against legal, financial, and reputational risks associated with corrupt practices.

NUMBER OF EMPLOYEES WHO RECEIVED ANTI-BRIBERY AND CORRUPTION TRAINING	FY2025	FY2024	FY2023
Breakdown:			
Senior Management (%)	62 (100%)	47 (100%)	36 (100%)
Junior Management (%)	116 (100%)	115 (100%)	89 (100%)
Executive (%)	349 (100%)	332 (100%)	252 (100%)
Non-executive (%)	1,144 (100%)	830 (100%)	398 (100%)
Total	1,671	1,324	775

We continuously organise a series of comprehensive ABC-related training and communication sessions tailored for the Board, Senior Management, and all employees. The initiatives included:

- Deleum's Integrity Day 2025 conducted on 15 October 2025
- Induction training for all new employees covering the COBC, COI, and ABC
- Mandatory annual COBC, ABC, and Integrity refresher sessions for all Directors and employees
- Annual ABC and COI declaration
- CRA Workshop for Compliance Champions
- Ongoing SULU programme to continuously foster a culture of open communication and attentiveness to ensure that all voices are heard
- Regular communication via digital platforms

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Complementing this commitment, we continue to invest in upholding ethical business practises through training and communication. While these initiatives may incur costs, they mitigate potential financial losses from fraud or corruption, reinforce compliance, and embed a culture of integrity across our operations and value chain.

Metrics, Targets, and Performance

Deleum has established metrics and targets, as incorporated in the Sustainability Roadmap, with their performance outlined below:

SUSTAINABILITY ROADMAP 2025-2029		
Sustainability Aspirations: Be a Future-ready Company for EESG by 2029		
Initiative	Metric / Target	Performance
Enhance employee awareness on ABC-related topics and whistleblowing channel	All employees attend ABC-related training annually [#]	✔ Achieved
	Zero confirmed incidents of corruption and actions taken [#]	✔ Achieved
ISO 37001 ABMS Certification	Achieve ISO 37001 ABMS re-certification for Deleum Berhad, Deleum Services Sdn. Bhd. and Deleum Technology Solutions Sdn. Bhd. [^]	⚙️ Ongoing
	Achieve ISO 37001 ABMS certification for all BUs by 2029 [^]	⚙️ Ongoing

Note:

[#] Metric aligns with GRI Standards (GRI 205: Anti-corruption 2016)

[^] This metric is developed internally by Deleum

16 CYBER AND INFORMATION SECURITY

Target 16.6 Develop effective, accountable and transparent institutions at all levels



Why It Matters

In this era of digitalisation, safeguarding data privacy from any digital security threats is essential to maintain stakeholders' confidence of our stakeholders in our data integrity and system reliability. With increasing reliance on digital systems, any breach could impact our operational continuity and regulatory compliance, underscoring the importance of robust governance and proactive measures.

Our Approach

In line with the National Cyber Security Agency's Cyber Security Act 2024 and the Securities Commission's Guidelines on Technology Risk Management, we successfully completed a cybersecurity baseline self-assessment and identified improvement opportunities to further strengthen our cybersecurity posture, reinforcing our commitment to strong governance and compliance. To enhance organisational awareness, we conducted a Cybersecurity Awareness Talk and updated our Cybersecurity Policy to reflect evolving threats and best practices.

Our commitment to PDPA remains a key priority. In compliance with Malaysia's Personal Data Protection Act ("PDPA") requirements, our PDPA Committee oversees the compliance and implementation of PDPA requirements. A designated PDPA Compliance Officer is responsible for the implementation of PDPA compliance and reports to the PDPA Committee accordingly. To strengthen our governance framework, we revised and updated our PDPA Policy and Procedure, which came into effect on 25 June 2025. Following this update, a briefing session was conducted on 24 September 2025 to enhance employee awareness of PDPA requirements, including the latest amendments under the Personal Data Protection (Amendment) Act 2024. Our commitment to data protection principles is reflected in the PDPA Policy and Procedure. Throughout the year, we recorded zero reports and penalties relating to breaches of customer privacy and losses of customer data.

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We adopted a risk-based approach to identify and manage localised risks through specific actions and mitigations. Our resilience is reinforced through proactive measures such as security assessments and testing, internal audits, and continuous monitoring. These actions ensure our digital infrastructure can withstand and adapt to emerging cyber threats. We remain committed to ongoing risk assessments to identify opportunities for improvement and strengthen our defences against evolving cyber and information security threats.

In FY2025, we developed our Information and Communication Technology Roadmap (2026-2028) to further strengthen our digital infrastructure, enhance cybersecurity and modernise systems through initiatives such as Enterprise Resource Planning system upgrade, AI-driven programming, mobile applications, and Human Resource Management System implementation. In the same year, we also introduced Robotic Process Automation Policy and Policy on the Use of AI Tools to ensure emerging digital tools are used responsibly and ethically, reinforcing safe, efficient, and innovative operations in alignment with the Group's digital transformation objectives.

	FY2025	FY2024	FY2023
Number of substantiated complaints received concerning breaches of customer privacy and loss of customer data	0	0	0

Metrics, Targets, and Performance

Deleum has established metrics and targets, as incorporated in the Sustainability Roadmap, with their performance outlined below:

SUSTAINABILITY ROADMAP 2025-2029		
Sustainability Aspirations: Be a Future-ready Company for EESG by 2029		
Initiative	Metric / Target	Performance
Cybersecurity risk management strategy	Completion of cybersecurity baseline self-assessment [^]	✔ Achieved
	Zero incidents of substantiated complaints received concerning cyber security breaches [^]	✔ Achieved
	Zero incidents of substantiated complaints received concerning breaches of customer privacy and loss of customer data [#]	✔ Achieved

Note:

[#] Metric aligns with GRI Standards (GRI 418: Customer Privacy 2016)

[^] This metric is developed internally by Deleum

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SUPPLY CHAIN MANAGEMENT

Target 12.7 Promote public procurement practices that are sustainable, in accordance with national policies and priorities



Why It Matters

At Deleum, we are committed to responsible procurement practices by embedding sustainability into our procurement process. As our reliance on a diverse supply chain grows, our approach focuses on cost efficiency, compliance and strengthening stakeholder trust. By supporting local businesses and integrating EESG principles, we enhance the integrity of our supply chain while contributing positively to society and the environment.

Our Approach

Adherence to Ethical Standards

Our approach is anchored in strong ethical standards and guided by the Group's COBC and Procurement Policy and Procedure, which set clear expectations for ethical business practices. These guidelines ensure that suppliers uphold Deleum's commitment to zero corruption, minimise environmental impacts, safeguard the rights of employees and casual workers, and prevent human rights violations. In FY2025, in collaboration with the MACC, we conducted Integrity Day in Labuan for selected suppliers to reinforce ethical business practices and anti-corruption compliance.



All new suppliers are evaluated during the pre-qualification process, and we conduct annual site visits to major and critical suppliers to review and ensure compliance with our standards. To further strengthen our procurement practices, in FY2025 we are integrating the EESG considerations into supplier assessments for both new and existing suppliers.

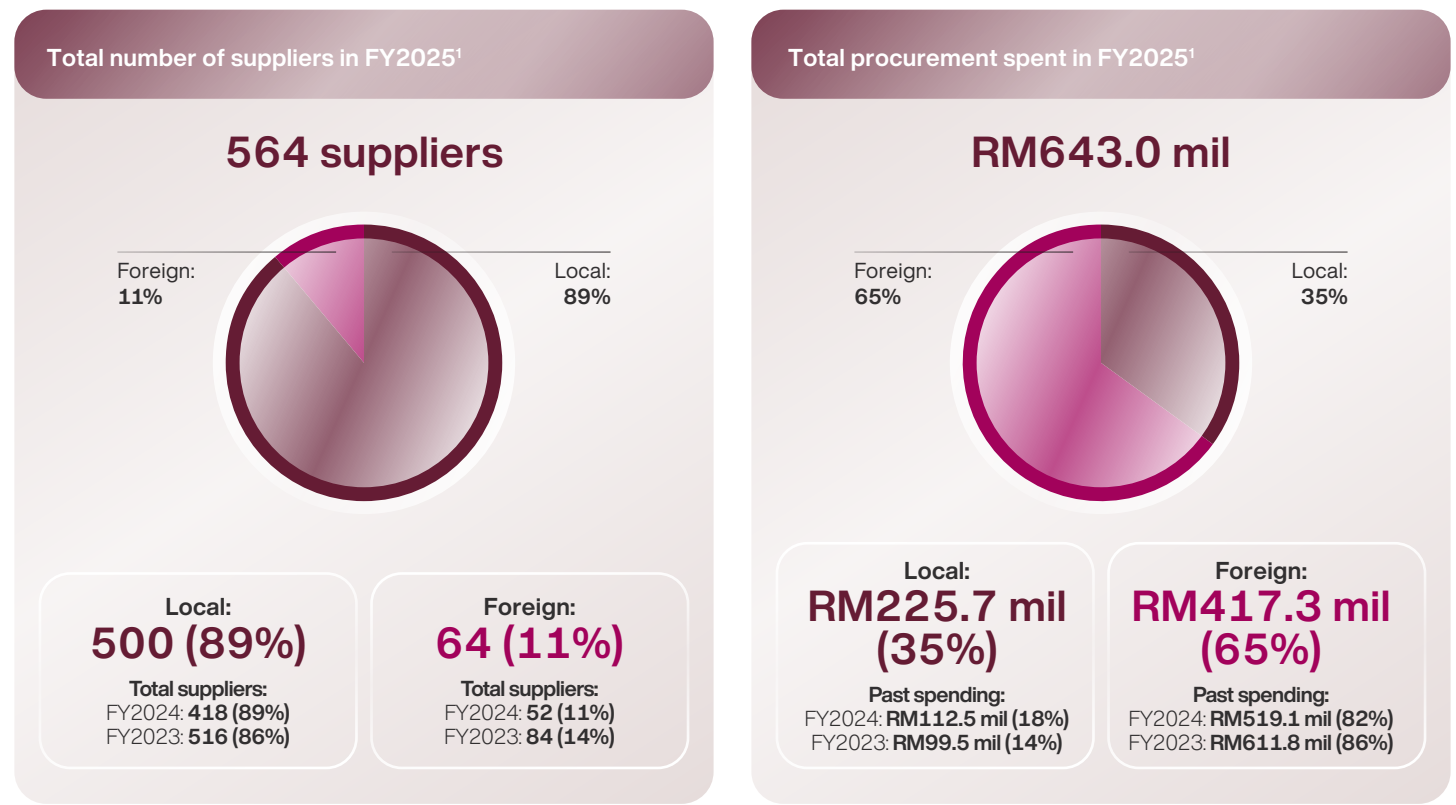
Supporting Local Suppliers

Our suppliers consist of distributors and contractors for sourcing tools and equipment, chemicals and lubricants, labour, spare parts, and services materials among others. As part of our social responsibility and fostering economic growth, we continued our support for local suppliers for the value they bring such as lower environmental impact in terms of emissions from transportation and the opportunities created for local businesses.

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Balancing Local and Foreign Suppliers

In FY2025, we increased the proportion of spending on local suppliers from 18% to 35%, reinforcing our commitment to local sourcing. However, spending on foreign suppliers remains higher due to the procurement of specialised items and the impact of foreign exchange rate movements.



Note:

- 1. The newly acquired Indonesian operations are excluded from this reporting year due to the ongoing operational integration process.

Metrics, Targets, and Performance

Deleum has established metrics and targets, as incorporated in the Sustainability Roadmap, with their performance outlined below:

SUSTAINABILITY ROADMAP 2025-2029		
Sustainability Aspirations: Be a Future-ready Company for EESG by 2029		
Initiative	Metric / Target	Performance
Supplier EESG Assessment	100% of new suppliers assessed against EESG criteria annually [#]	Ongoing
	100% of selected major and critical suppliers assessed against EESG criteria annually [^]	Ongoing
Sustainability-related awareness programme for suppliers	All selected suppliers attend the programme annually [#]	Achieved

Note:

[#] Metric aligns with GRI Standards (GRI 308: Supplier Environmental Assessment 2016 and GRI 414: Supplier Social Assessment 2016)

[^] This metric is developed internally by Deleum