



**DELEUM**

# **ANTI-BRIBERY MANAGEMENT SYSTEM POLICY**

DELEUM BERHAD and its subsidiaries (“DELEUM”) are fully committed to conducting its business with the highest integrity.

In line with its commitment, DELEUM is committed to:

1. Complying with all relevant and applicable requirements, laws and regulations on anti-bribery and corruption, in particular the Malaysian Anti-Corruption Commission Act 2009 (Act 694) and ISO 37001 Anti-Bribery Management System.
2. Upholding the values of integrity, transparency, accountability, and ethical behavior in the conduct of its business and operations.
3. Upholding anti-bribery principles in all business dealings and interactions dealing with external parties, including business partners, government agencies and other interested parties.
4. Prohibiting employees from soliciting, accepting, giving, or offering bribes and any form of corruption.
5. Establishing an anti-bribery function to access relevant information, providing advice and guidance to employees and interested parties on the anti-bribery management system and issues relating to bribery, and report bribery-related concerns directly to top management.
6. Committed to the continual improvement of its Anti-Bribery Management System through regular risk assessments, monitoring, audits, and corrective actions to enhance its effectiveness.

DELEUM requires its employees and business associates within its business activity to adhere to this Policy. Any violation of this Policy may lead to legal prosecution and will result in appropriate disciplinary actions in line with Deleum’s policies, procedures, directives and guidelines.

DELEUM promotes transparency and integrity, encouraging all employees and interested parties to report any improper conduct or malpractice within the Group in good faith, in confidence, and without fear of reprisal at [whistle@deleum.com](mailto:whistle@deleum.com) or [WBChairPerson@deleum.com](mailto:WBChairPerson@deleum.com).

**RAMANRAO BIN ABDULLAH**  
GROUP CHIEF EXECUTIVE OFFICER

9 June 2026