



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 laws and regulations on anti-bribery and corruption, in particular the Malaysian Anti-Corruption Commission Act 2009 (Act 694).
2. Upholding the values of integrity, transparency, accountability, and ethical behavior in the conduct of its business and operations.
3. Achieving the Anti-Bribery Management System objectives and targets by conducting assessments on corruption and bribery risk.
4. Upholding anti-bribery principles in all business dealings and interactions dealing with external parties, including business partners, government agencies and other stakeholders.
5. Prohibiting employees from soliciting, accepting, offering bribes and any form of corruption.
6. Establishing an independent anti-bribery compliance function.

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 the Company's policies, procedures, directives and guidelines.

DELEUM promotes transparency and integrity, encouraging all employees and stakeholders to report any improper conduct or malpractices within the Group at whistle@deleum.com.

RAMANRAO BIN ABDULLAH
GROUP CHIEF EXECUTIVE OFFICER
29 SEPTEMBER 2023

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