



DELEUM

CODE OF BUSINESS CONDUCT

REV. NO: 2

APPROVED BY THE BOARD OF DIRECTORS ON 23 FEBRUARY 2022

AMENDMENT RECORD

The amendment record shall be maintained to identify the changes made to this policy.

The Head, Corporate Compliance & Risk shall verify the amendment records.

| Revision No. | Revision Date | Page No. | Description of amendment | Verification |
|---------------------|----------------------|-----------------|---|-----------------------------------|
| 1 | 23/05/2019 | 10/12 | Revision of Equal Opportunity clause to Human Rights clause. | Group Risk Manager |
| 2 | 23/02/2022 | All | Revision on existing Code of Business Conduct (COBC) - formatting and content | Head, Corporate Compliance & Risk |
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DEFINITION

| Term | Definition |
|---|---|
| <i>Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001</i> | <i>An Act to provide for the offence of money laundering, the measures to be taken for the prevention of money laundering and terrorism financing offences and to provide for the forfeiture of property involved in or derived from money laundering and terrorism financing offences, as well as terrorist property, proceeds of an unlawful activity and instrumentalities of an offence, and for matters incidental thereto and connected therewith.</i> |
| <i>Competition Act 2010</i> | <i>An Act to promote economic development by promoting and protecting the process of competition, thereby protecting the interests of consumers and to provide for matters connected therewith.</i> |
| <i>Gratification</i> | <p><i>Defined by the Malaysia Anti-Corruption Commission Act 2009 as:</i></p> <ul style="list-style-type: none"> <i>a) Money, donation, gift, loan, fee, reward, valuable security, property or interest in property of any description whether movable or immovable, financial benefit, or any other similar advantage;</i> <i>b) Any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;</i> <i>c) Any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;</i> <i>d) Any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;</i> <i>e) Any forbearance to demand any money or money's worth or valuable thing;</i> <i>f) Any other service or favour of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty; and</i> <i>g) Any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (a) to (f).</i> |
| <i>Hospitality</i> | <p><i>Hospitality includes, but is not limited to, considerate care provided to or received from third parties, which may include:</i></p> <ul style="list-style-type: none"> <i>a) Meals or refreshment</i> <i>b) Organisation of corporate events or activities</i> <i>c) Entertainment of individuals, especially at sporting or other public events</i> <i>d) Travel and accommodation expenses</i> |

| Term | Definition |
|---|---|
| <i>Malaysia Anti-Corruption Commission Act 2009</i> | <i>An Act to provide for the establishment of the Malaysia Anti-Corruption Commission (“MACC”), to make further and better provisions for the prevention of corruption and for matters necessary thereto and connected therewith.</i> |
| Malaysian Anti-Corruption Commission | An independent commission that was established under Malaysia Anti-Corruption Commission Act 2009 to investigate and prevent any form of corruption and abuse of power and advice and educate the public against corruption. |
| <i>Officer of a public body/ Public Officials</i> | <i>Any person who is a member, an officer, an employee or a servant of a “public body”, and includes a member of the administration, a member of Parliament, a member of a State Legislative Assembly, a judge of the High Court, Court of Appeal or Federal Court, and any person receiving any remuneration from public funds, and, where the public body is a corporation sole, including the person who is incorporated as such.</i> |
| <i>Personal Data</i> | <i>Defined by Personal Data Protection Act 2010 as: Any information in respect of commercial transactions, which a) is being processed wholly or partly by means of equipment operating automatically in response to instructions given for that purpose b) recorded with the intention that it should wholly or partly being processed by means of such equipment c) is recorded as part of relevant filing system or with the intention it should form part of a relevant filing system that relates directly or indirectly to a data subject, who is identified or identifiable from that information or from that and other information in the possession of a data user, including any sensitive personal data and expression of opinion about the data subject; but does not include any information that is processed for the purpose of a credit reporting agency under the Credit Reporting Agencies Act 2010.</i> |
| <i>Personal Data Protection Act 2010</i> | <i>An Act to regulate the processing of personal data in commercial transactions and to provide for matters connected therewith and incidental thereto.</i> |
| <i>Public Body</i> | <i>Defined by Malaysia Anti-Corruption Commission Act 2009 as: a) The Government of Malaysia; b) The Government of a State; c) Any local authority and any other statutory authority; d) Any department, service or undertaking of the Government of Malaysia, the Government of a State, or a local authority; e) Any society registered under subsection 7(1) of the Societies Act 1966; f) Any branch of a registered society established under section 12 of the Societies Act 1966;</i> |

| Term | Definition |
|--|---|
| | <p>g) Any sport body registered under section 17 of the Sports Development Act 1997;</p> <p>h) Any co-operative society registered under section 7 of the Co-operative Societies Act 1993;</p> <p>i) Any trade union registered under section 12 of the Trade Unions Act 1959;</p> <p>j) Any youth society registered under section 9 of the Youth Societies and Youth Development Act 2007;</p> <p>k) Any company or subsidiary company over which or in which any public body as is referred to in paragraph (a) – (j) has controlling power or interest;</p> <p>l) Any society, union, organization or body as the Minister may prescribe from time to time by order published in the Gazette.</p> |
| <i>Sensitive Personal Data</i> | <p>Defined by Personal Data Protection Act 2010 as: Any personal data consisting of information as to the physical or mental health or condition of a data subject, his political opinions, his religious belief or other beliefs of a similar nature, the commission or alleged commission or alleged commission by him of any offence or any other personal data as the Minister may determine by order published in the Act.</p> |
| Special Committee | <p>Special Committee of Deleum Group shall comprise of the Chairman, Deputy Chairman and GCEO. However, if any of the committee members is the subject of or has an interest in the matter under approval, then the person shall abstain from making decision and that, the next higher level of authority shall be sought.</p> |
| Third Parties | <p>Any external individual or organisation with whom Deleum Group has, or plans to establish, some form of business relationship. This includes (but not limited to) existing or prospective agents, representatives, intermediaries, joint venture partners, customers, consultants, advisers, contractors, subcontractors, vendors and service providers.</p> |
| <i>U.K. Bribery Act 2010</i> | <p>An Act in United Kingdom of Great Britain and Northern Ireland that make provision about offences relating bribery and for connected purposes.</p> |
| Universal Declaration of Human Rights (“UDHR”) | <p>An international document adopted by the United Nations General Assembly that enshrines basic rights and fundamental freedoms of all human beings.</p> |
| U.S. Foreign Corrupt Practices Act (“FCPA”) | <p>A United States law that was enacted for the purpose of making it unlawful for certain classes of persons and entities to make payment to foreign government officials to assist in obtaining or retaining business.</p> |

CODE OF BUSINESS CONDUCT

1. OVERVIEW

- i. Deleum Berhad (“Deleum”) and its subsidiaries, related companies and affiliates (“Deleum Group or the Group”) are committed in maintaining high values of integrity in its business dealings and conduct. Deleum strongly believes in the Core Values of Integrity, Professionalism, Sustainability as well as Excellence, which promotes transparency and openness in communications, encourage respect among individuals, develop a high standard for a safe and healthy environment and embrace excellence whilst striving for continuous improvements.
- ii. The following are the Group’s Core Values:
 - **Integrity** – Respect, Honesty, Ethics
 - **Professionalism** – Accountability, Competency and Teamwork
 - **Sustainability** – Healthy/Balanced Lifestyle, Social Responsibility, Environmental Sustainability
 - **Excellence** – Quality, Deliverance, Reward
- iii. The Group has in place its Code of Business Conduct (“COBC”) as a guidance to its directors and employees as well as its Third Parties with regards to the Group’s standard of integrity and code of conduct to be observed in the performance of work and business practices.
- iv. COBC is applicable to all directors, officers, and employees of the Group. The Group will not permit any illegal or unethical conduct in connection with any of its business dealings.
- v. The Group requires that all of its Third Parties to comply with the COBC when performing such work or services for the Group. Failure by Third Parties to comply with the principles and standards as set out in COBC may result in the termination of the non-complying party’s business and commercial relationship with the Group.
- vi. All the Group’s directors, officers and employees are required to read and understand COBC and be individually responsible for observing COBC in upholding the good name and reputation of the Group.
- vii. Whenever in doubt, the following parties must be consulted by the employees pertaining to the appropriate conduct before taking any action:
 - a. Immediate superior
 - b. Respective Head of Department
 - c. Respective Head of Business Unit
 - d. Head of Human Resources (“Head of HR”)
 - e. Head of Corporate Compliance & Risk (“Head of CC&R”)

- viii. For the directors, Corporate Services Department (“Corporate Services”) shall be consulted should there be any doubt pertaining to the appropriate conduct before taking any action. Reference to COBC shall be made should any further action is required.
- ix. The Group reserves the right to modify, revise, or waive any of the provisions under this COBC from time to time at the Group’s discretion. Any modification, revision or waiver of any of the provisions made from time to time shall be read together and form part of COBC.

2. STANDARDS OF CONDUCT

- i. All activities undertaken must always be in the best interests of the Group. In this regard, all directors, officers and employees must take ownership and responsibility in the performance of their duties in relation to the affairs of the Group and always act in the best interests of the Group.
- ii. All directors, officers and employees must comply and adhere to COBC at all times.

3. COMPLIANCE OF LAWS AND POLICIES, PROCEDURES, GUIDELINES AND REGULATIONS

- i. All activities undertaken by Deleum Group must always be lawful and in accordance with:
 - a. all local and foreign applicable laws, rules and regulations such as criminal laws, laws designed to combat bribery, anti-corruption, anti-money laundering and anti-terrorism;
 - b. all applicable laws, rules and regulations applicable to Deleum Group for its operations outside Malaysia, including but not limited to, employment, economic sanctions, competition and anti-trust laws, international trade laws, environmental, export import, health, labour, safety and securities laws; and
 - c. all policies, guidelines, general business principles and code of conduct as may be required by the Third Parties.
- ii. All directors, officers and employees must comply at all times with the prevailing policies, procedures, guidelines as well as applicable laws, rules and regulations mentioned Clause 3 (i) above. If the applicable laws, rules and regulations mentioned above conflict with this COBC, stricter code, laws, rules or regulations will prevail; and
- iii. Directors, officers and employees may consult the Legal Department (“Legal”) if any of them has any questions regarding applicable laws, rules or regulations.

4. CORE VALUES AND BUSINESS ETHICS

4.1. INTEGRITY

4.1.1. ANTI-BRIBERY AND CORRUPTION

- i. The Group is committed in complying with anti-bribery and corruption laws that apply to its operations, including but not limited to the Malaysian Anti-Corruption Commission Act 2009, U.S Foreign Corrupt Practices Act and UK Bribery Act 2010. The commitment was translated into the establishment and implementation of Anti-Bribery and Corruption (“ABC”) Policy (“ABC Policy”).
- ii. Bribe is anything of value not limited to money, including but not limited to commissions that you have reason to suspect will be perceived as bribes or have reason to suspect will be used by the recipient to pay bribes or for other corrupt purposes and facilitation payments (‘grease payments’) which are regarded as payments to government officials to gain access, secure or expedite the performance of a routine function they are in any event obligated to perform, gifts, kickbacks, favours or entertainment that others could view as an attempt to influence another party’s actions or decisions, obtain or retain business, or acquire any sort of improper advantage.
- iii. Corruption is any unlawful or improper behaviour that seeks to gain advantage through illegitimate means. As per ABC Policy, corruption is defined primarily as any action considered as an offence of giving or receiving gratification by Malaysia Anti-Corruption Commission. Corruption can include but not limited to the act of giving or accepting bribes or inappropriate gifts, double dealing, under-the-table transactions, manipulating elections, kickbacks, diverting funds, laundering money and defrauding investor.
- iv. Under these laws and policy, all directors, officers and employees are prohibited from offering or accepting bribes to or from any public officials or officer of public body or Third Parties to secure or award any contract, retain business or to direct business to any persons or to have an improper advantage.
- v. All directors, officers and employees are prohibited from corrupt practices in dealing with public officials or officer of public body or Third Parties. It is an offense to make or offer a payment, gift or other benefits to any public officials or officer of public body or Third Parties in order to induce favourable business treatment.
- vi. All directors, officers and employees must also refrain from any activity or behaviour that could give rise to the perception or suspicion of any corrupt conduct or the attempt thereof. Promising, offering, giving, or receiving any improper advantage in order to influence the decision of the recipient or to be so influenced may not only result in disciplinary action but also criminal charges.

- vii. If any employee or Third Parties is confronted with a demand or offer for a bribe from any party, such demand or offer must be reported immediately to any of the parties below for further action:
 - a. Immediate Superior
 - b. Respective Head of Department
 - c. Senior Management
 - d. Head, CC&R

Reference: Anti-Bribery and Corruption Policy

4.1.2. GIFT AND HOSPITALITY

- i. In the course of business transactions, the Group recognizes the importance of promoting goodwill and building cordial relationships through gift and hospitality. While such practices are allowed, restrictions have been imposed through Gift, Hospitality, Donation and Sponsorship (“GHDS”) Procedure to prevent the practices from being disguised or give rise to the perception or suspicion of any corrupt conduct or the attempt thereof.
- ii. Under no circumstances shall an employee or director of Deleum Group offer, give, receive, or solicit any gift or hospitality from any third party that has or may have business interest with Deleum Group.
- iii. Gift and hospitality given or received must be in accordance with applicable national laws, the Group’s ABC Policy, and its related policies, procedures, and guidelines.
- iv. Directors and employees shall declare any gift or hospitality offered to any public officials, or officer of public body or Third Parties pursuant to the provisions in the Group’s GHDS Policy and Procedure.
- v. Directors and employees shall declare receipt from any public officials, or officer of public body or Third Parties pursuant to the provisions in the Group’s GHDS Policy and Procedure.

Reference: Gift, Hospitality, Donation and Sponsorship Procedure

4.1.3. DONATION AND SPONSORSHIP

- i. The Group is committed to the principles of “corporate responsibility” and is committed to sponsorships and donations to demonstrate “responsible corporate citizenship” to the communities in which the Group operates.
- ii. The Group prohibits the use of donations and sponsorship as a scheme or concealment for bribery to influence a business outcome or favourable decision.
- iii. Directors and employees must ensure that all donations and sponsorships on behalf of the Group are given through legal and proper channels. Particular care must be taken in ensuring that the charities or sponsored organisations on the receiving end are valid bodies and are able to manage the funds properly.

- iv. Donation and sponsorship, both in cash or in-kind form offered by the Group must be in accordance with applicable national laws, Group's ABC Policy and, GHDS Policy and Procedures.
- v. All Directors and employees must obtain prior approval in accordance with established procedures before making donations or sponsorships on behalf of the Group. Approved donations and sponsorships should be made transparently and recorded accurately. All requests for donations and sponsorships received by the Directors must be referred to Special Committee.

Reference: Gift, Hospitality, Donation and Sponsorship Procedure

4.1.4. SELECTION, ENGAGEMENT, AND MANAGEMENT OF THIRD PARTIES

- i. Any commercial transaction between Deleum Group and any of its prospective or existing Third Parties shall, at all times, be conducted in compliance with the applicable laws, rules, and regulations as well as Group's policies and procedures and consistent with the core values, principles, and best interest of the Group.
- ii. Due Diligence Assessment and continuous monitoring on both potential and existing Third Party shall be conducted by respective entity in the Group as per requirement in Third Party Anti-Bribery and Corruption Management Guidelines.
- iii. All procurement decisions are made solely in the Group's best interests and in compliance with the Group Procurement policies and procedures. Payments made shall commensurate with the services or products provided.

Reference: Third-Party Anti-Bribery & Corruption Guideline

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4.1.5. FINANCIAL INTEGRITY, PROCEDURES, AND INTERNAL CONTROLS

- i. The Group shall make and keep reasonably detailed books, records and accounts to reflect all transactions, including all expenditures, invoices, expense reports, receipts, disbursements, vouchers and other disposition of monies and assets that conform to the following standards of accounting and policies:
 - a. Malaysia Financial Reporting Standards
 - b. International Financial Reporting Standards
 - c. Companies Act 2016
 - d. Main Market Listing Requirement by Bursa Malaysia Securities Berhad
- ii. All directors and employees must comply with all established financial policies and the Group's procedures to safeguard the integrity and accuracy of the Group's financial reporting.
- iii. Any attempt or action that possibly or could compromise the integrity and accuracy of the Group's financial reporting is strictly prohibited. The following is the list, but not exhaustive, of the prohibited attempt or action:
 - a. Conceal, alter, destroy, or otherwise modify the Group's records or documents other than in accordance with established, ordinary course procedures and in no case impede or frustrate an investigation or audit or conceal or misstate information;
 - b. Intentionally make a false or misleading entry in a record, report, file or claim;
 - c. Establish accounts, companies, or arrangements to circumvent or frustrate Group's controls, policies or procedures;
 - d. Fail to cooperate fully and truthfully with internal and external audits authorised by the Group; and
 - e. Engage in any scheme to defraud anyone of money, property or honest services.
- iv. The Group shall also maintain a system of internal controls to reflect with reasonable accuracy all transactions and dispositions of the Group's assets to ensure that the said transactions and dispositions are executed in accordance with specific or general authorization per the prevailing policies and procedures.

4.1.6. POLITICAL ACTIVITIES

- i. The Group is apolitical company.
- ii. Deleum recognises the right of its employees, in their capacity as citizens, to participate and involve in legitimate political activities. However, to maintain Deleum Group's apolitical stand and avoiding identification with any political party, employees and directors are required to use their outside office hours or annual leave entitlement for such matters.
- iii. Employees can participate as individuals in the political process on their own accord, volition, time, and resources. Political opinions are personal opinions and must not represent the Company.

- iv. Facilities, equipment, and resources owned by the Group is prohibited from being utilized, in any form, for or related to any political campaign or party functions.
- v. Donation and sponsorship, in any form, offered by or on behalf of the Group to any political parties are strictly prohibited.

4.1.7. ANTI-MONEY LAUNDERING AND ANTI-TERRORISM

- i. Deleum Group is committed in complying with Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 (“AMLA”) in combating money laundering and terrorism financing.
- ii. Money laundering is the process of hiding the true nature or source of illegally obtained funds and passing it surreptitiously through legitimate business channels by means of bank deposits, investments, or transfers from one place (or person) to another.
- iii. Anti-money laundering provisions are designed to help prevent legitimate businesses from being used by criminals for this purpose, and to assist law enforcement agencies to trace and recover criminal assets and terrorist funding.
- iv. Terrorism financing is the act of providing financial support, funded from either legitimate or illegitimate source to terrorist or terrorist organisation to enable them to carry out terrorist acts or will benefit any terrorist or terrorist organization.
- v. The Group, its directors and employees shall not engage in any financial transactions involving properties or funds which promotes or are the results of criminal activity including diverting, concealing, receiving, or using the proceeds of such criminal activity.
- vi. The Group, its directors and employees shall not also finance, sponsor, facilitate or assist any terrorist person, activity or organization or any such person’s activity or organization designated as a terrorist person, activity, or organization.
- vii. Customer Due Diligence and continuous monitoring shall be conducted to understand and evaluate potential money laundering and terrorism financing arising from the relationship and business transaction with the customer.
- viii. Any suspicious transaction shall be reported to Legal for further review, assessment, and deliberation with Audit Committee. The activities may include, but not limited to the following:
 - a. Payments made in currencies that differ from invoices;
 - b. Attempts to make payment in cash or cash equivalent (out of normal business practice);
 - c. Payments made by third parties that are not parties to the contract; and
 - d. Payments to or accounts of third parties that are not parties to the contract.

Reference: Anti Money Laundering and Counter Financing Terrorism (AML-CFT) Guideline

4.1.8. CONFLICT OF INTEREST

- i. Directors and employees must always act in the best interests of the Group and shall not be involved in any activities where their personal interest conflict with the business interests of the Group or the performance of their duties.
- ii. A conflict of interest arises when a director or an employee have a personal interest that could be seen to have the potential to interfere with his objectivity in performing duties or exercising judgement on behalf of the Group. Position in the Group, official working hours, Group resources and assets shall not be used for personal gain or for the advantage of the associates.
- iii. Directors and employees shall not compete against Deleum Group and shall not use any position or influence or company information, assets or resources for any personal gain or improper benefit of the associates.
- iv. All directors and employees shall disclose and declare their interest on annual basis to Corporate Services and Group HR, respectively, on annual basis and as soon as there is any change to the interest.
- v. Any actual, perceived, or potential conflict of interest shall be disclosed and declared by the directors and employees, as soon as practically possible upon the occurrence of such conflict.
- vi. Infringement of Conflict-of-Interest Guideline, as per list below, but not exhaustive, constitutes a serious misconduct or offences warranting disciplinary action, including termination of employment against the offender:
 - a. Failure to disclose a conflict of interest in an appropriate and timely manner;
 - b. Intentionally make a false or misleading entry in a record, report, file, or claim;
 - c. Failure to provide complete and accurate information on the conflict and
 - d. Failure to comply with the procedures to manage and resolve the conflict.

Reference: Conflict of Interest (COI) Guideline

4.1.9. CORPORATE ASSETS

- i. Corporate Assets refer to any asset, both in tangible and intangible form, that is owned or leased by the Group to facilitate and support the Group's business objectives and operations.

- ii. Corporate assets shall be protected from waste, loss, damage, abuse, misuse, theft, fraud misappropriation or infringement of Intellectual Property rights and managed as per standard industry practice. Hence, employees shall perform the following roles and responsibilities:
 - a. Utilize corporate assets upon obtaining authorization and as per its design intent, in accordance with the applicable regulations, external and internal policies, standards, processes, and procedures;
 - b. Perform due care on the corporate asset, including establishing necessary policies, procedures and guidelines that conforming to the standard industry practice;
 - c. Undertake necessary safeguard measure for the corporate asset to prevent any form loss, damage, wastage, misappropriation and misuse, either knowingly or unknowingly, and
 - d. Undertake necessary action, as per regulations and respective external or internal policies, standards, processes and procedures should the corporate asset be in the unacceptable condition.

4.1.10. CONFIDENTIAL INFORMATION

- i. Confidential Information shall include but not be limited to proprietary information with respect to the business and financing of the Group and its dealings and transactions, trade secrets, technology, financial information, contracts and tender information, technical data, patents, know-how and affairs and likewise in relation to the Group's associate companies, suppliers, principals, partners, customers, and any other persons with whom the Group is in contact.
- ii. Confidential Information is a valuable asset of the Group and must not be communicated or disclosed in any manner to competitors, customers, persons engaged in any aspect of the securities industry, members of trade associations or other third parties unless such communication or disclosure is authorised by the Group.
- iii. Any unlawful or unauthorised use or disclosure of Confidential Information belonging to the Group may result in irreparable loss and/ or damage to the Group and cause significant harm to the Group's business. In such cases, the Group may institute civil and criminal proceedings against the offending party.
- iii. The Group places trust in its employees to handle Confidential Information or other sensitive information responsibly and discreetly. Hence, employees shall perform the following roles and responsibilities:
 - a. Utilize confidential information as per authorized by the Group or the owner of the information in the course of their duties to the Group or as required by applicable laws and regulations;

- b. Undertake necessary safeguard measure to prevent unauthorized access or disclosure of the confidential information, either full or partial, to unauthorized parties, either directly or indirectly; and
- c. Undertake necessary action, as per regulations and respective external or internal policies, standards, processes and procedures should the confidential information be disclosed without any authorization.

4.1.11. INTELLECTUAL PROPERTY

- i. Intellectual Property includes any of the Group's designs, symbols, names, images used, patents, trademarks, copyrights or other intangible assets created for the Group. All employees, contractors, sub-contractors, agents, consultants or other service providers must comply with all laws, rules, regulations and contractual obligations regarding the valid intellectual property rights of the Group and other parties, including patents, copyrights, trade secrets and other proprietary information.
- ii. Intellectual Property shall be protected from loss, damage, misuse, theft, fraud and managed as per standard industry practice. Hence, employees shall perform the following roles and responsibilities:
 - a. Utilize intellectual property upon obtaining authorization and as per its design intent, in accordance with the applicable regulations, external and internal policies, standards, processes, and procedures;
 - b. Perform due care on the intellectual property, including establishing necessary policies, procedures and guidelines that conform to the standard industry practice;
 - c. Undertake necessary safeguard measure for the intellectual property to prevent any form loss, damage, misappropriation and misuse, either knowingly or unknowingly; and
 - d. Undertake necessary action, as per regulations and respective external or internal policies, standards, processes and procedures should the intellectual property be violated.

4.1.12. DATA PRIVACY AND PROTECTION

- i. In conjunction with local legal requirements, the Group protects the personal data and/or sensitive personal data of its employees and Third Parties. Personal data and/or sensitive personal data shall have the same meanings as prescribed in the Personal Data Protection Act 2010 ("PDPA Act").
- ii. All employees with access to personal data and/or sensitive personal data shall comply with the requirements of the PDPA Act.

- iii. The Group has established a PDPA Committee and appointed a Compliance Officer to monitor and report on the compliance of the PDPA Act. Personal data and/or sensitive personal data notices to the Group’s employees and identified persons have been issued accordingly.

Reference: Personal Data Policy

4.1.13. ANTI-COMPETITION

- i. The Group is committed in complying with Competition Act 2010 (“CA 2010”) in regulating and control anti-competitive conduct, hence ensuring free and fair competition in the market.
- ii. In accordance with CA 2010, employees are prohibited from the followings:
 - a. Initiating or participating in any form of anti-competitive agreements, either through vertical or horizontal agreements, that could significantly prevent, restrict, or distort competition in any market for goods or services;
 - b. Initiating or participating in any form of conduct, either independently or collectively, that amounting to an abuse of dominant position in any market for goods and services; and
 - c. Adopting strategies to illegally exclude competitors from the market, such as, without limitation anti-competitive bundling or predatory pricing.

Reference: Competition Act 2010

4.1.14. PUBLIC DISCLOSURE

- i. The Group is committed to provide accurate, clear, timely and complete disclosure of material information pertaining to the Group’s performance and operations and ensuring equal access to such information to enable informed and orderly decision making by the investing public. Hence, the Corporate Disclosure Policy was established to fulfil this commitment.
- ii. Employee shall not either orally or in writing or in any form (including on social media websites such as Twitter, Facebook, Instagram, and others) make or circulate any public statement on the policies, decisions, measures or work undertaken by the Group, unless the employees are duly appointed or authorised to make such statement on behalf of the Deleum Group.

Reference: Corporate Disclosure Policy

4.1.15. DISCLOSURE DUTIES

- i. All employees shall report any suspected, illegal, unethical or improper conduct of which they have become aware during the performance of work and business dealings.

- ii. Any breach of the COBC shall be reported to the following parties, in accordance with COBC:
 - a. Immediate superior
 - b. Respective Head of Department
 - c. Senior Management
 - d. Head of HR
 - e. Head of CC&R
- iii. Employees may also disclose any alleged or suspected improper conduct using the procedure provided for in the Group's Whistleblowing Policy.
- iv. Deleum Group will not tolerate any retaliation against anyone making such a report in good faith. Appropriate action will be taken against employees making a not good faith complaint according to the Group's Whistleblowing Policy.

Reference: Whistleblowing Policy

4.2. PROFESSIONALISM

4.2.1. HUMAN RIGHTS

- i. The Group supports thirty (30) human rights as listed in the Universal Declaration of Human Rights (“UDHR”) and respects the sovereignty of governments throughout the world. The Group believe it is the primary responsibility of local governments to safeguard and protect the basic human rights of their citizen.
- ii. In line with the support for human rights, the Group applies the following practices in all of its business and operations at all locations:
 - a. Prohibition on any form of discrimination and harassment;
 - b. Recruitment and selection are conducted on objective basis and focusing on the applicant’s suitability for the job and ability to fulfil the job requirements;
 - c. Opportunities for promotion and training is being communicated and made available to all employees on a fair and equal basis and
 - d. The Group’s policies including compensation, benefits and other relevant matters associated with contracts employment are formulated and applied without any discrimination and based on meritocracy basis.

Reference: Equal Opportunity Policy

4.2.2. HARASSMENT

- i. The Group will not tolerate any forms of harassment. These actions or behaviours include derogatory comments based on gender, racial or ethnic characteristics, and unwelcomed sexual advances, spreading of malicious rumours or use of emails, voicemail and other forms of communication channels to transmit derogatory or discriminatory material.
- ii. Harassment is any inappropriate conduct which has the purpose or effect of:
 - a. Insults or belittling remarks;
 - b. Inappropriate jokes and comments;
 - c. Displays of inappropriate pictures, cartoons or other materials;
 - d. Sexual advances, offensive contact, comments about another’s sexual conduct; and
 - e. Threats or coercion such as malicious, hostile, and intimidating statements or actions.

Reference: Equal Opportunity Policy

4.3. SUSTAINABILITY

4.3.1. HEALTH, SAFETY AND ENVIRONMENT

- i. The Group realises that Health, Safety and Environment is of paramount importance and recognises the value and importance of implementing safety processes and inculcating a strong safety culture.
- ii. All employees and the Group's Third Parties are collectively responsible towards Health, Safety and Environment excellence by adhering to Deleum's 10 Life Saving Rules which cover the followings:
 - a. Valid safe work permit.
 - b. Energy isolation.
 - c. Systems override.
 - d. Confined space entry.
 - e. The line of fire.
 - f. Personal Protective Equipment ("PPE").
 - g. Perform risk assessment.
 - h. Follow prescribed journey management plan.
 - i. Mobile/portable devices.
 - j. Smoking and ignition source.
- iii. All employees and Group's Third Parties are required strictly adhere to the safety measures contained in the Group, principal, partners or customer's safety policy.

Reference: Health, Safety and Environment Policy & Life Saving Rules

4.3.2. SUBSTANCES MISUSE POLICY

- i. In accordance with Deleum's Substance Misuse Policy, the Group is fully committed to provide a safe and productive work environment in striving to ensure that the workplace is free from substance abuse. Substance abuse is the use of illegal drugs, the misuse of legal drugs or other substances and the abuse of alcohol.
- ii. To this end, all Group's personnel shall not use, possess, distribute or sell alcoholic beverages, illicit or un-prescribed controlled drugs, or misuse legitimate prescription drugs (except drugs medically prescribed for the personnel) while performing work at any workplace including customer's premises and/or while operating the Group's vehicles or equipment.
- iii. To ensure adherence to this policy, the Group may conduct unannounced testing and searches for substance abuse or abuse of alcohol at any time deemed necessary. This policy is in line with relevant legal and regulatory requirements relating to the possession, purchase, sale, transfer or use of alcohol and drugs.

Reference: Substance Misuse Policy

4.4. EXCELLENCE

4.4.1. RESPONSIBILITY TOWARDS CUSTOMERS AND PRINCIPALS

- i. The Group strives to meet customers' requirements for quality, reliability and value. To achieve this, the Group will ensure that the provision of the products and/or services comply with all applicable quality control standards, applicable laws, rules and regulations, as well as related internal control procedures. As such, all relevant employees, contractors, subcontractors, agents, consultants or other service providers will comply with all contract specifications including customer's or principal's code of business conduct.

5. DISCIPLINE PROCESS AND SANCTIONS

5.1. CONSEQUENCES OF COBC VIOLATION

- i. The Group takes any violation of this COBC very seriously. Violation to any part of the COBC is deemed to have committed misconduct and may result in disciplinary action and /or punishment as per Conduct and Discipline Policy and relevant regulations that may be deemed appropriate by the Group
- ii. The followings are deemed as misconduct:
 - a. Failure to maintain and observe secrecy with respect to the Group's activity as well as classified information throughout employment;
 - b. Absence without leave or without reasonable cause
 - c. Publication of information of any sort, confidential or otherwise, in any form, obtained by the employee in the course of the employment with the Group, without any authorization;
 - d. Misuse of the Group's name, letter head or stationery or the emblem, logo or trademark in providing the reference;
 - e. Making unauthorized public statement;
 - f. Performing any activities outside the Group by taking part, either directly or indirectly in the management or business activities of any entities without written permission from the Group;
 - g. Serious pecuniary embarrassment;
 - h. Perform any unauthorized action or being associated with such action leading to the loss to the Group; and
 - i. Violation of any part of the Code of Business Conduct.
- iii. Disciplinary action to be taken against any misconduct shall be commensurate with the gravity of the offence that is set out in Deleum's guidelines and procedures.

Reference: Conduct and Discipline Policy

6. CONTINUAL IMPROVEMENT

6.1. REVIEW

- i. COBC implementation shall be continuously reviewed and reported, supported by the documentation and relevant activities to ensure effective and sustainable COBC culture.
- ii. COBC shall be reviewed and updated periodically or whenever one or combination of the following factors is/are triggered:
 - a. Periodic Review
At least once in three years by the appointed team formed by Head, Corporate Compliance & Risk.
 - b. Changes in legal and regulatory requirement
Should there be changes in the legal and regulatory requirement that is perceived as significant to the business and/or operations of the Group.
 - c. Changes in related policies and procedures
Should there be changes in the related policies and procedures that perceived as significant to the business and/or operations of the Group.
 - d. Changes in the organisation, business, or operations
Should there be any changes to the organisation and/or business and/or operations that could lead to the significant impact to the business and/or operation.
 - e. Lesson Learnt
Should there be any lesson learnt from both internal and external incidents.
 - f. Recommendations from Assurance/Audit Exercise
Should there be any recommendation from assurance and/or audit exercise on COBC by independent internal and/or external party.

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