

Anti-Bribery & Corruption Policy



Ertha Energy

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Ertha Energy is committed to conducting all business activities with integrity, transparency, and accountability, and in full compliance with all applicable local and international anti-bribery and anti-corruption laws, including the Malaysian Anti-Corruption Commission (MACC) Act 2009, UAE Federal Decree-Law No. 31 of 2021, and regulations, including but not limited to anti-bribery.

Ertha Energy adopts a strict **zero-tolerance** approach toward bribery and corruption in all forms, whether direct or indirect, across all jurisdictions of operation.

This policy applies to all employees, directors, officers, and any third parties acting on behalf or representing Ertha Energy and other affiliated companies including but not limited to agents, consultants, contractors, and business partners.

Bribery is defined as the offering, promising, giving, accepting, or soliciting of any undue advantage (financial or non-financial) for the purpose of improperly influencing any decision or action.

Ertha Energy strictly prohibits:

- Offering, giving, or receiving bribes, kickbacks, or improper benefits.
- Facilitation payments or unofficial payments of any kind.
- Misrepresentation of facts or information to gain unfair advantage.
- Engaging in any form of corrupt, fraudulent, or unethical conduct.

All personnel are required to:

- Comply with all applicable legal and regulatory requirements.
- Exercise appropriate due diligence in all business dealings.
- Maintain accurate and transparent records.
- Avoid conflicts of interest and disclose any potential conflicts or risks.

Any suspected or actual violation must be reported immediately to management or where applicable, the designated compliance officer. Reports may be made confidentially or anonymously, and no retaliation will be tolerated against individuals reporting in good faith.

Non-compliance with this Policy will result in disciplinary action, which may up to and include termination of employment or contractual relationships. The Company may also pursue legal action against individuals or entities involved in corrupt practices in accordance with applicable laws.

Ertha Energy is committed to continually improving its robust anti-bribery controls and fostering a culture of ethical conduct and compliance across all operations.

BK Dash

Managing Director

05 January 2026