# Deccan Transcon Leasing Limited

# Anti-Bribery and Corruption Policy

**(Effective from 28th October 2025)**

## INTRODUCTION

Deccan Transcon Leasing Limited, along with its subsidiaries and affiliates (collectively referred to as the "Deccan Group" or the "Company"), is firmly committed to conducting its business with the highest standards of ethics, integrity, and compliance with all applicable laws and regulations across its global operations.

This document forms a critical component of Deccan Group's Anti-Bribery Management System ("ABMS") and underscores the Company's unwavering commitment to the prevention of bribery and corruption in all aspects of its business activities. It demonstrates the Company's adherence to ABMS requirements and outlines the principles governing ethical conduct within the organization.

The purpose of this Policy is to clearly articulate Deccan Group's zero-tolerance approach to bribery, corruption, and any form of improper payments. It further defines the roles and responsibilities of Deccan personnel and Business Partners in ensuring effective implementation of the Policy.

The primary objective of this Policy is to establish robust anti-bribery and anti-corruption procedures across all Deccan Group operations to prevent, detect, and address any potential violations of applicable laws and regulations.

**Key Objectives of the ABMS Program:**

- Ensure strict compliance with all relevant anti-bribery and anti-corruption laws and regulations;
- Promote awareness of Deccan's commitment to ethical business practices and its zero-tolerance stance on any breach of this Policy; and
- Strengthen ABMS implementation through structured processes for incident reporting, investigation, and compliance monitoring.

This Policy reflects Deccan's dedication to maintaining a culture of integrity and transparency in every facet of its operations.

## SCOPE AND EXCLUSION

This Policy applies to:

- **All Deccan Personnel:** This includes every employee of Deccan Group—whether permanent, fixed-term, or temporary—as well as any personnel engaged through third-party contractual arrangements, operating at all levels and grades across global locations.

- **All Business Partners:** This encompasses all individuals and entities conducting business with or on behalf of Deccan Group, including but not limited to consultants, contractors, subcontractors, and their respective employees, trainees, secondees, casual workers, volunteers, and interns.

Together, these individuals and entities are collectively responsible for upholding the ethical standards and compliance requirements established under this Policy.

## KEY CONCEPTS AND DEFINITIONS

A "**Bribe**" is an inducement, payment, reward, or advantage offered, promised, provided, or authorized to be provided, directly or indirectly, to any person or entity to gain any commercial, contractual, regulatory or personal advantage.

A Bribe may be anything of value and not just money, gifts, inside information, sexual or other favours, business contracts, corporate hospitality or entertainment, offering employment, payment or reimbursement of travel expenses, donation or social contribution, abuse of function and can pass directly or through a Third Party.

**"Board of Directors"** or **"Board"** means the Board of Directors of the Company, as constituted from time to time.

"**Business Partner**" or "**Third Party(ies)**" means any individual who, or organization which, transacts with or enters into any arrangement with Deccan Group, including customers, suppliers, landlords/lessors, service contractors, intermediaries, business contacts, consultants, representatives, sub-contractors, agents, advisers, business development agents, shipping agents and freight forwarders, customs agents, sales agents, joint venture partners, co-investors, licensees, travel agents, finders, expediters and formalities agents, real estate agents, brokers, lawyers, accountants, tax advisors and political advisors, liaising personnel, and public bodies.


"**Corruption**" includes wrongdoing on the part of an authority, a commercial organization, or any person associated with such commercial organization, or those in a position to exercise power through means that are illegitimate, immoral, inappropriate, or incompatible with ethical standards. Corruption often results from patronage and is associated with bribery.

"**Employee**" means any employee or director of Deccan Group.

"**Entertainment**" includes business courtesies such as meals, refreshments, invitations or tickets to recreational, cultural, or sports events and venues, as well as hosting of any associated travel and accommodation, etc. Entertainment is treated as a Gift in those circumstances where the party who made the offer does not attend himself/herself.

"**Gifts**" means anything of value offered to or received by an individual or members of their family. Gifts include cash and non-cash items such as artwork, watches, jewellery, equipment, preferential discounts, loans, favourable terms on a product or service, business or employment opportunities, services, prizes, donations to charities, transportation, use of another company's vehicles, use of vacation facilities, stocks or other securities, participation in stock offerings, home improvements, and tickets and gift certificates.

"**Gifts and Entertainment Register**" means the web-based gifts and entertainment register, or locally approved register used to record, disclose and/or obtain approvals relating to the receiving of Gifts and Entertainment.

The term "**Government Official**" or "**Public Official**" includes

- Any minister, elected or appointed official, director, officer or employee (regardless of rank), any person in the service or pay of the government, or remunerated by the government by fees or commission for performing any public duty, or person acting on behalf of any government (whether at a national, state/provincial or local level) or any department, agency or instrumentality thereof, and/or of any state-owned or state-controlled enterprise, and/or of any public international organization, or an entity that is financed in large measure through public appropriations, is widely perceived to be performing a government function, or has its key officers and directors appointed by a government;

- Any judge, or any person who undertakes any adjudicatory functions;

- Any person who prepares electoral rolls;

- Any person associated with a university, educational institute or scientific organization that receives substantial financial assistance from the government or any other public authority;

- Political party officials and candidates for public office, or any person acting on their behalf;

- Any person acting in any official, administrative, legislative or judicial capacity for, or on behalf of, any such government or department, agency, instrumentality, company, or public international organisation. For example, any officer or employee of a national oil company, national airline, national railway, or national shipping company is deemed to be a "government official", as are members of customs, military, or police organisations.

"**Hosting**" means the payment of 'Hosting expenses', including transportation, lodging or related travel expenses, for a Government Official, including state company delegations.

"**Immediate Family**" means spouse, mother, father, son, daughter, brother, sister, or any of the step or in-law relationships, whether established by blood or marriage.

**"Corporate hospitality"** is generally defined as corporate events or activities organised by an organisation that involve the entertainment of employees and third parties for the benefit of that organisation.

**"Money laundering"** is the process whereby the criminal origin or nature of money or assets is concealed through legitimate business dealings, or where legitimate funds are used to facilitate or finance criminal activities, including terrorism.

## REQUIREMENTS

### 1. Policy Statements

- Deccan is committed to doing business with integrity and transparency, and Deccan has a zero-tolerance approach to non-compliance with the anti-bribery policy.
- Deccan Group prohibits Bribery and any form of improper payments/dealings in the conduct of business operations.
- Deccan Group is committed to ensuring compliance with all applicable anti-bribery and anti-corruption laws in all jurisdictions where it operates.
- This Policy shall be reviewed periodically (at least annually) by the Board to ensure alignment with the anti-bribery and anti-corruption objectives.
- If such a review brings out a need for any change in the policy, the Board shall critically evaluate the impact of proposed changes.
- Consequential changes in this Policy should be approved by the Board.
- Deccan Group always encourages raising of genuine concerns pertaining to bribery-related issues or functioning of ABMS, while assuring confidentiality, and without the fear of retaliation.
- Deccan Group shall evaluate the performance of the ABMS on a regular basis and work towards improving the effectiveness of the Policy.
- Even if some conduct is permissible under the rules and regulations of the jurisdiction concerned, if it contravenes this Policy, the provisions of this Policy shall prevail and be followed by the persons to whom this Policy applies.

Conversely, even if some conduct is permissible under this Policy, if it contravenes the rules and regulations of the jurisdiction concerned, such rules and regulations shall prevail and be followed by the persons to whom this Policy applies.

### 2. Gifts and Hospitality

#### 2.1 General Principle

2.1.1 Deccan Group personnel shall not, whether directly or indirectly, accept, offer, provide, promise, or authorize the giving of anything of value—including gifts, entertainment, or any other benefit—with the intent to improperly influence a decision, obtain or retain business, or secure an undue advantage for Deccan Group or for personal benefit.

2.1.2 Deccan Group maintains a **zero-tolerance approach** towards bribery and any form of improper payment or advantage, including facilitation payments or kickbacks.

#### 2.2 Prohibited Conduct

2.2.1 Personnel shall not, and shall ensure that members of their Immediate Family do not, offer, solicit, or accept cash, cash equivalents, gifts, entertainment, favours, or items of significant value from any competitor, vendor, supplier, customer, or business partner that currently conducts or seeks to conduct business with Deccan Group, for the purpose of securing an improper advantage.

2.2.2 Personnel shall not accept loans or financial assistance from any person or entity having or seeking business dealings with Deccan Group, **except from recognised financial institutions.**

### 2.3 Permissible Gifts and Hospitality

2.3.1 This Policy does not prohibit the **exchange of items of nominal value**, such as calendars, pens, mugs, books, flowers, or small gift packs (e.g., sweets or dry fruits), when such exchanges occur as customary business courtesies.

2.3.2 Modest **refreshments or casual meals** offered or accepted in the ordinary course of business shall also be permissible, provided they are reasonable and appropriate in nature.

2.3.3 The **appropriateness and value** of any gift or hospitality must be assessed in light of the specific circumstances and shall comply with this Policy and Deccan Group's **Code of Conduct.**

### 2.4 Prohibition on Bribery through Gifts

2.4.1 The act of gifting or providing hospitality is **strictly prohibited** when it is used, or can be perceived to be used, as a form of bribery or inducement to obtain or retain business, influence a business decision, or gain any improper advantage.

### 2.5 Conditions for Acceptable Exchange

2.5.1 The exchange of gifts or hospitality shall be considered acceptable under this Policy only if all the following conditions are met:

a) It is not intended to influence a third party in obtaining or retaining business, to reward business advantage, or to solicit favours, benefits, or any corrupt purpose;

b) It complies with all applicable laws and regulations;

c) It does not involve cash or cash equivalents, such as gift vouchers or certificates;

d) It is appropriate to the circumstances and local customs, for instance, customary gifts of nominal value during festive occasions such as Diwali in India;

e) It is offered or received openly and transparently, avoiding any perception of impropriety;

f) It is in accordance with this Policy and Deccan Group's Code of Conduct;

g) It is offered or received on behalf of Deccan Group and not in a personal capacity; and

h) The receipt of any gift or hospitality is recorded in the Gifts and Entertainment Register, as required under the Code of Conduct.

### 2.6 Record-Keeping and Disclosure

2.6.1 All gifts and hospitality offered or received by Deccan personnel must be accurately recorded in accordance with internal reporting and approval procedures.

2.6.2 Failure to declare or record gifts or hospitality, where required, shall constitute a breach of this Policy and may result in disciplinary action in accordance with Deccan Group's disciplinary framework.

## 3. Money Laundering

Deccan Group maintains a **zero-tolerance policy** towards any practices associated with money laundering, including dealing in proceeds derived from criminal activities. Money laundering is a serious criminal offense, and the laws governing it may have **extraterritorial effect**, meaning that legal consequences can extend beyond national borders. Penalties for violations are severe and may include **extradition and imprisonment** in foreign jurisdictions.

To ensure compliance with anti-money laundering laws, all employees are expected to conduct **appropriate due diligence** on prospective and existing business counterparties to understand their business, background, and the origin and intended destination of funds, property, and services. For the purposes of this Policy, **counterparties** include any party that Deccan Group currently engages with, or intends to engage with in the future, whether on a regular or one-off basis. This includes, but is not limited to, customers, contractors, suppliers, consultants, agents, joint venture partners, and other business partners.

Deccan Group has implemented several initiatives to strengthen governance and mitigate the risk of money laundering, which include the following:

- Conducting **regular training and compliance programs** to ensure employees understand and adhere to internal anti-money laundering policies;
- Ensuring that employees frequently involved in **decision-making related to counterparties**, particularly in financial transactions, are fully aware of applicable anti-money laundering laws and regulations;
- Requiring employees to remain **vigilant and report any suspicious activities** by customers, consultants, or business partners through proper reporting channels, and to consult in-house anti-money laundering experts when necessary;
- Avoiding **complex payment arrangements**, such as cash payments, payments to third parties, payments to foreign accounts, or advance payments, unless properly authorized and documented;
- Conducting **periodic audits** and implementing processes to ensure compliance with all accounting, record-keeping, and financial reporting requirements applicable to cash and payment transactions associated with contracts or other business dealings.

## 4. Charitable Contributions and Sponsorship

Deccan Group may, as part of its Corporate Social Responsibility (CSR) initiatives or other legitimate activities, support local charities or sponsor events such as sporting, educational, or cultural programs, provided such activities are legal, ethical, transparent, and consistent with applicable Malaysian laws, the Group's CSR Policy, and corporate governance framework.

Any charitable contribution or sponsorship, whether domestic or international, must comply with all relevant laws and regulations, receive prior approval from the appropriate authority, and must not be used to obtain or retain business or secure any improper advantage.

## 5. Political activities and payments

Deccan Group maintains a strictly apolitical stance. Any contribution to political parties or related entities shall be made only in accordance **with applicable** laws, with proper authorization, documentation, and disclosure.

Payment or use of corporate assets of any type as payment, directly or indirectly, to any person, business, political organization or public official, for any purpose that is not in accordance with applicable laws, is prohibited.

## 6. Facilitation Payment

A facilitation payment is a payment to secure or expedite a routine government action by an official. This Policy prohibits making facilitation payments unless the law otherwise permits specifically.

## 7. Due diligence and third-party screening

- Deccan requires all Business Partners / Third Parties to co-operate and ensure compliance with the terms of this Policy, to ensure a continued business relationship.

- Deccan shall assess the risk profile of the proposed engagement and conduct a reasonable and proportionate level of due diligence to check the Business Partner / Third Party's experience, background, and reputation before entering into any relationship.

- Different types of Business Partners / Third Parties may require different levels of due diligence depending on the inherent risk in underlying transactions and/or Third Parties involved.

- All Business Partners / Third Parties must cooperate and provide information and documents as may be required for due diligence.

- Regardless of perceived risk, all Business Partners / Third Parties shall be subject to Basic Due-Diligence, which should include a combination of the following activities:

♦ A questionnaire sent to the Business Partner / Third Party to verify whether it is a legitimate business entity and has the qualifications, experience, and resources needed to conduct the business for which it is contracted. This questionnaire may be administered if deemed necessary or required as part of the due diligence process;

♦ A web search on the Business Partner / Third Party and its top management to identify any related information;

♦ Searching appropriate government, judicial and international resources for relevant information;

♦ Checking publicly available debarment lists of organizations that are restricted or prohibited from contracting with public or government entities kept by national or local governments or multilateral institutions;

♦ Making enquiries from other entities about the Business Partner / Third Party's ethical reputation.

- Any Business Partner / Third Party whose responsibilities may include interacting with any Governmental Authority or Government Official on behalf of the Company shall be categorised as High-Risk Business Partner / Third Party and be subject to Anti-Bribery Due Diligence.

- Deccan may use additional criteria to determine whether any Business Partner / Third Party proposed to be engaged is a High-Risk Business Partner / Third Party and falls within the scope of the Anti-Bribery Due Diligence.

➢ If required over and above the Basic Due Diligence checks, as part of Anti-Bribery Due Diligence

▪ A written anti-corruption due diligence report shall be obtained from a reputable Third-Party risk advisory firm for all High-Risk Business partners / Third Parties.

▪ Findings of these reports shall be carefully considered by Deccan while taking a decision to continue, postpone, discontinue, or revise those transactions, projects, or relationships with High-Risk Business Partners / Third Parties.

## 8. Employee Responsibilities

- Each Deccan personnel shall ensure that he/she reads, understands and complies with this Policy. They should at all times avoid any activity that might lead to, or suggest, a breach of this policy.

- The prevention, detection and reporting of any form of bribery & corruption are the responsibility of all Deccan personnel. Deccan personnel shall report if they are offered a Bribe, are asked to give one, suspect that this may happen in future, or believe that they are a victim of any other form of unlawful activity, or are aware of any Bribe paid or received by any colleague or Third Party.

- Deccan personnel should accurately record payments or any other type of compensation made to a Third Party in Deccan's corporate books, records, and accounts.

- Deccan personnel should not:

➢ Deal with any undisclosed or unrecorded company funds, such as 'off-book' accounts for any purpose;

➢ Make false, misleading, incomplete, inaccurate, or artificial entries in Deccan's books and records;

➢ Use personal funds or third parties, including partners, to circumvent Deccan's procedures and controls, or to accomplish what is otherwise prohibited by this Policy.

➢ Deccan personnel should only deal with representatives that they believe are legitimate businesses and that have a reputation for integrity. Signs that a representative is unethical or could be paying a bribe should not be overlooked.

➢ Conducting transactions transparently reduces the risk of bribery. Deccan personnel should make sure that contracts accurately reflect the economics of the transaction. If payment terms are confusing, clarifications should be sought.

This policy should be read in conjunction with Deccan's Code of Conduct.

## 9. Recruitment of Employees

Deccan, as a diversified business organization, is committed to providing equal employment opportunities to all qualified and competent individuals, regardless of multicultural or multiracial background, whether sourced locally or internationally.

Recruitment and selection of employees shall be conducted based on approved and objective selection criteria to ensure that only the most qualified and suitable candidates are appointed. This approach is essential to maintain fairness and to prevent any element of corruption or undue influence in the hiring process.

Subject to applicable Malaysian laws, appropriate background checks shall be conducted to confirm that prospective employees have no history of involvement in bribery or corruption cases, either domestically or internationally. Enhanced due diligence shall be applied when hiring individuals for management positions, as these roles involve significant decision-making responsibilities and fiduciary obligations.

Any employee who becomes aware of, or reasonably suspects, that another individual subject to this policy has violated, or is about to violate, this policy or any applicable law, whether intentionally or inadvertently, must immediately report the matter in writing to their Head of Department (HoD) or the Human Resources Department.

## 10. Whistleblowing Policy

Employees are encouraged to report, in good faith and without malice, any concerns regarding actual or suspected incidents of bribery, corruption, or violations of company policies or legal requirements. Should you reasonably believe that a breach or violation may have occurred or is about to occur, your disclosure will be treated with confidentiality, to the extent reasonably practicable, even if, following investigation, it is determined that the concern was unfounded.

Furthermore, employees who make disclosures in accordance with this policy will be protected against any retaliatory or detrimental actions, to the extent reasonably practicable.

If you wish to report concerns related to any department, unit, employee, contractor, subcontractor, consultant, agent, representative, or other service provider, and prefer not to contact your Head of Department (HOD), Human Resources Department, or Compliance contact person, you may use the company's designated whistleblowing channels for such disclosures.

For detailed guidance on reporting procedures and protections, please refer to the Company's Whistleblower Policy.

## 11. Training

To ensure that all Deccan personnel, as well as all its Business Partners, relevant third parties, subsidiaries and affiliates, are completely familiar with the provisions of this Policy and applicable anti-corruption laws, Deccan shall provide training and resources, as appropriate. Certain associated/exposed Personnel, depending on their job scope, shall take and pass Deccan's anti-bribery training, which will be conducted by Deccan from time to time.

## 12. Investigations

The Board of Directors shall either initiate an investigation itself or issue directives to investigate a matter as and when required. Business and Functional Leadership shall ensure that any violation of this Policy, noticed by them or brought to their notice, is immediately reported to the Board in confidence, along with reasons for suspicion and available evidence.

## 13. Disciplinary action for non-compliance

Adherence to this Policy shall be monitored within the businesses with support from the Board. Internal Audit shall conduct periodic reviews in accordance with its guidelines.

- Deccan personnel who violate this Policy shall be subject to disciplinary actions, which may include one or more of the following:

- Counselling
- Formal apology
- Censure
- Recovery of financial loss incurred
- Down gradation of Designation
- Reduction in compensation
- Withholding of Promotion
- Down gradation in Grade
- Voluntary resignation
- Termination of services


In exceptional cases, as determined by the Board, any other penalty may be imposed. Business Partners, such as consultants and representatives, violating this Policy may be subject to the imposition of large fines/penalties, as the case may be, in addition to the immediate termination of commercial/ business relationships with Deccan.

## 14. Reporting Mechanism

Deccan personnel and Business Partners who are, or have become, aware of, or suspect a violation of this Policy and/or anti-corruption laws are under an obligation to report the same in the following manner;

- By email to compliance@deccantrans.com , or
- By telephone to the Whistle-blower Hotline - +040 - 40146828, or
- By letter addressed to the Registered office of the Company, marked "Private and Confidential", and delivered to the Compliance officer at Suite No. 507, 5th Floor, Image Capital Park, Image Garden Road, Shaikpet, Madhapur, Hyderabad, Telangana - 500081, India.

Non-reporting of such instances of bribery, in spite of knowledge of such actions, shall be deemed to be misconduct and a violation of the Code of Conduct and this Policy.

## 15. Protection / No Retaliation

- Those who refuse to accept or offer a Bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible retaliation. Deccan Group encourages openness and shall support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken.
- As outlined in our Vigil Mechanism and Whistle-blower Policy, we are committed to ensuring that no one suffers any detrimental treatment because of refusing to take part in bribery or corrupt activities, even if this results in the loss of business to Deccan.
- Deccan shall not tolerate any retribution or retaliation against anyone for raising a concern in good faith about a potential violation of this Policy, or for co-operating with an investigation. When a concern is raised, Deccan shall maintain confidentiality to the extent permitted by the applicable law.

## 16. Review & Governance

- The board should periodically interact with key stakeholders to review the ABMS program objectives and key components to identify improvement areas/aspects needing realignment due to a changed control environment.

- Observations/suggestions emanating from these interactions, as well as learnings from handling bribery-related issues, should be leveraged for continual improvement of the ABMS program.