ANTI-BRIBERY MANAGEMENT SYSTEM POLICY

TNB INTEGRATED LEARNING SOLUTION SDN.BHD
200601004984 (724733-U)
(A Wholly Owned Subsidiary of Tenaga Nasional Berhad)

TNB Integrated Learning Solution Sdn. Bhd. (ILSAS) is committed to maintaining high standards of integrity and ethical conduct in all its activities and business dealings. All employees and persons acting on behalf of ILSAS are expected to conduct themselves honestly, responsibly and professionally, while safeguarding the reputation and interests of the Company.

ILSAS adopts a **zero-tolerance approach towards all forms of bribery and corruption**, whether direct or indirect. We are committed to conducting our business fairly, professionally and with integrity in all dealings and relationships.

This Anti-Bribery Management System Policy establishes the principles and requirements for **preventing, detecting and addressing bribery and corrupt practices** arising from ILSAS' activities and business relationships.

All third parties representing or acting on behalf of ILSAS are expected to understand and comply with the anti-bribery principles and requirements applicable to their dealings with the Company.

This Policy shall be read together with the relevant **TNB and ILSAS policies, codes, procedures and guidelines**, including the TNB Code of Ethics, whistleblowing policy and applicable requirements relating to gifts and benefits.

The **Board of Directors and Top Management of ILSAS** are committed to providing leadership and oversight in the implementation of effective anti-bribery measures throughout the Company.

These responsibilities include identifying, monitoring and mitigating bribery risks involving employees, business activities and relationships with relevant stakeholders, in support of ILSAS' Vision, Mission and commitment to responsible business practices.

Accordingly, ILSAS is committed to:

- Complying with the **Malaysian Anti-Corruption Commission Act 2009 [Act 694]**, including Section 17A, and all other applicable anti-bribery laws, regulations, policies and procedures relevant to the performance of its activities and responsibilities;
- Establish, implement, maintain and **continually improve appropriate anti-bribery controls** through the ILSAS Anti-Bribery Management System in accordance with the applicable requirements of **ISO 37001:2025**;
- Provide appropriate reporting channels and **encourage employees and relevant stakeholders to raise concerns in good faith** regarding actual or suspected bribery or corrupt practices through the established Whistleblowing channels, without fear of retaliation;
- Prohibit the giving, offering, promising, soliciting or receiving of any bribe, improper payment, gift or benefit that is contrary to the applicable policies and guidelines adopted by ILSAS;
- Ensure that the **Anti-Bribery Compliance Function** is provided with the appropriate authority and independence to oversee and monitor compliance with the Anti-Bribery Management System, provide advice and guidance, and report relevant matters to the Board of Directors and Top Management; and
- Require all employees to read, understand and comply with this Policy. Any breach or non-compliance may result in **appropriate disciplinary action and/or legal action**, in accordance with applicable Company policies, procedures, directives and guidelines.

"BETTER LEARNING. BRIGHTER FUTURE"

ZULKIFLI BIN SALAHUDIN
Managing Director
TNB Integrated Learning Solution Sdn. Bhd. – ILSAS