

GDEX Group Anti-Bribery and Corruption Policy Statement

We, at GDEX Group are committed to applying the highest standards of ethical conduct, integrity and accountability in all our business activities and operations in compliance with anti-bribery and related laws, and ISO 37001:2025 Anti-Bribery Management System (ABMS) that are applicable to the organization.

This Policy applies to all GDEX business dealings and relationships.

GDEX has a zero-tolerance policy towards any form of bribery and corruption by, or of, its employees or any persons or companies acting for GDEX or on its behalf. The GDEX's ABMS apply throughout the Group and reflect our commitment to fight any corrupt and unethical practices in the course of conducting business in the jurisdictions in which we operate.

The Board and management are committed to implementing and enforcing effective and robust policies and procedures to prevent, monitor and eliminate bribery and corruption and to the continual improvement of GDEX's ABMS. An Anti-Bribery and Corruption Committee is assigned with the responsibility to oversee the implementation of GDEX's ABMS with direct access to the Board and management for issues relating to bribery and corruption.

Employees and others acting for or on behalf of GDEX are strictly prohibited from directly or indirectly soliciting, accepting or offering bribes in relation to GDEX's businesses and operations. Employees across GDEX are expected to observe the GDEX Code of Ethics and Conduct and uphold GDEX's zero tolerance towards bribery and corruption. Employees who fail to comply with the GDEX Code of Ethics and Conduct will be subjected to appropriate disciplinary and legal actions. GDEX provides avenues for all employees and stakeholders to make reports on any improper conduct, which is governed by GDEX's Whistleblowing Policy and Procedures.

Muhammad bin Ibrahim

Chairman