



I REIT MANAGERS SDN. BHD.

Registration No. 202101014501 (1414801-X)

CODE OF CONDUCT AND ETHICS

1. INTRODUCTION AND OBJECTIVE

This Code of Conduct and Ethics (“**Code**”) sets the tone and standards for ethical conducts of I REIT Managers Sdn Bhd (“**I REIT**” or “**Manager**”), the management company of AME Real Estate Investment Trust (“**AME REIT**”), to guide actions and behaviours of all Directors and Employees of the Manager (“**Directors**” and “**Employees**”) at work.

The principles and standards embodied in this Code are founded on high standards of professional and ethical practices. Directors and Employees must exercise judgement in applying the principles and standards to any particular situation. This Code is not intended to be exhaustive and should be read in conjunction with the existing framework of all applicable laws, rules and regulations as well as the Manager’s policies.

For all intents and purposes, Directors and Employees shall always observe and ensure compliance with all applicable laws, rules and regulations to which they are bound to observe in discharging of their duties.

2. APPLICABILITY

The Code is applicable to all Directors and Employees (including full time, probationary, contract and temporary staff) of the Manager. Each Director or Employee has a duty to read and understand the Code. Violation of any of the Code’s provisions can result in disciplinary action, including termination of employment.

If a Director requires further clarification on the Code, the Director may refer to the Chairperson of the Board of Directors of Manager (“**Board**”) or the Chief Executive Officer (“**CEO**”), whereas for an Employee, the Employee may refer to his/her immediate superior (“**Superior**”) or Head of Department (“**HOD**”).

3. CORE AREAS OF CONDUCT

3.1 Conflict of Interest

A conflict of interest occurs when the personal interest interferes or appears to interfere with the interest of the Manager and/or AME REIT. Directors and Employees must avoid any conflict of interest with the Manager and/or AME REIT and must not use their positions

or knowledge gained directly or indirectly in the course of their duties or employment for private or personal advantage.

Should there be an actual or potential conflict of interest arises, or may arise, the affected Directors and Employees shall make full disclosure to the Board or to the Superior/HOD, where applicable, the nature and extent of such conflict. The affected individuals shall then be abstained from making material decision with respect of any transaction, contract or proposed contract or arrangement in which they are interested, directly or indirectly.

3.2 Corruption, Acceptance and Provision of Gifts

Directors and Employees should never use improper means or provide gift, bribe and/or benefit to influence other stakeholders in order to obtain and retain business or secure an unfair advantage in any business transaction.

No Director and Employee shall solicit gifts from persons or entities who deal with the Manager and/or AME REIT in connection with their official duties. Gifts that are offered should not be accepted if this would create or give rise to the appearance of impropriety or bias that would damage the reputation of the Manager and/or AME REIT.

For the avoidance of doubt, normal business courtesies such as meals and entertainment, occasional token gifts and customary gifts during festivals, special occasions or social events are permissible. In addition, infrequent and moderate business meals and entertainment with clients and infrequent invitations to attend local social events and celebratory meals with clients can be appropriate aspects of promoting good business relationships, provided that they are not excessive and do not create the appearance of impropriety.

The Manager adopts an Anti-bribery and Anti-corruption Policy which is available on AME REIT's website at www.amereit.com.my.

3.3 Money Laundering

Money laundering is the illegal process of concealing the origins of money obtained or generated by criminal activity, such as drug trafficking or terrorist funding. This is typically by means of transfers involving foreign banks or legitimate businesses. The Manager prohibits any form of money laundering. All Directors and Employees are expected to take appropriate action to prevent money laundering activities. Reasonable due diligence should be undertaken to understand the background of any prospective business

counterparties, and the origin and destination of money or assets involved. Any Employees who is aware of, or suspects any activities relating to money laundering should report to their Superior, HOD or the Compliance Officer.

3.4 Confidential Information

Directors and Employees shall exercise caution and due care to safeguard any information of a confidential and sensitive nature relating to the Manager and/or AME REIT which is acquired in the course of their employment, and are strictly prohibited to disclose to any person, unless the disclosure is duly authorised or legally mandated.

In the event that a Director or an Employee knows of material information affecting the Manager and/or AME REIT which has not yet been publicly released, the material information must be held in the strictest confidence by the Director or Employee involved until it is publicly released.

The obligation to preserve the Manager's and/or AME REIT's confidential information is ongoing even after the Director or Employee cease his/her employment with the Manager.

3.5 Insider Information and Securities Trading

Directors and Employees are prohibited to trade in AME REIT's securities while they are in possession of material price sensitive non-public information or to provide such information to others to trade in AME REIT's securities. Directors and Employees must not enter into any transaction in AME REIT's securities until such information is publicly released.

Violation of this policy can result in civil and criminal penalties.

3.6 Protection of the Manager's and/or AME REIT's Assets and Funds

Directors and Employees shall safeguard the Manager's and/or AME REIT's assets and funds, including its physical premises, equipment and facilities as well as the records and information or data (both physical and electronic means) to ensure availability for legitimate business purposes. The Manager's and/or AME REIT's assets shall only be used in a safe, ethical and lawful manner and shall not be used for pursuing improper personal gain or opportunity.

3.7 Records Management and Control

All books, records and accounts must be controlled and maintained so that they are prepared on timely basis and conform to generally accepted and applicable accounting principles and to all applicable laws and regulations.

The preparation and maintenance of accurate and adequate records are the responsibility of each Employee. No unauthorised, false, improper or misleading records or entries shall be made in the books and records of the Manager and/or AME REIT, under any circumstances.

3.8 Fair Dealing

Directors and Employees should deal fairly with customers, suppliers and other parties with whom they deal during the course of business. They should not take unfair advantages through manipulation, concealment, abuse of confidential information, proprietary or trade secret information, misrepresentation of material facts or any other unfair dealing practice.

3.9 Workplace Health and Safety

The Manager is committed to provide a safe and healthy workplace environment to all Employees. Periodic health and safety training and programme will be provided to ensure Directors and Employees understand their occupational health and safety obligations and diligently comply with all health and safety requirements, policies and procedures set out by the Manager.

Every Director or Employee must diligently observe and comply with the Manager's health and safety policies as well as relevant Occupational Safety and Health laws and regulations in countries within which the Manager and/or AME REIT operates.

3.10 Sexual Harassment and Violence

Any form of harassment and violence within the Manager is unacceptable. It is the Manager's policy to provide all Employees with a working environment free from any form of sexual harassment and violence. Any questions concerning issues of such should be directed to either the individuals' Superior/HOD or the Human Resource Department. All such reports shall be treated in the strictest confidence.

3.11 Fair and Courteous Behaviour

The Manager is committed to provide fair and equal opportunity to ensure that employment decisions are based on merits and performance without regard to race, religion, gender, nationality, age or disability and shall not create any form of discrimination or prejudice in the workplace.

3.12 Compliance with Laws, Rules and Regulations

The Manager and/or AME REIT will comply with all applicable laws, rules and regulations of the governments, commissions and exchanges in jurisdictions and countries within which the Manager and/or AME REIT operates. Directors and Employees are responsible for taking appropriate actions to understand and comply with the laws, rules and regulations that are applicable to their positions and/or works.

4. REPORTING VIOLATIONS OF THE CODE

Any Director or Employee who knows of, or suspects, a violation of the Code, is encouraged to report the concerns through the Manager's Whistleblowing Channel. The provision, protection and procedure of the Whistleblowing Policy for reporting of the violations of the Code are available on the AME REIT's website at www.amereit.com.my.

No individual will be discriminated against or suffer any act of retaliation for reporting in good faith on violations or suspected violations of the Code.

5. WAIVER OF THE CODE

Waiver of the application of this Code may be granted by the Board or the appropriate Board Committee of I REIT as it deems fit and appropriate.

6. REVIEW OF THE CODE

This Code shall be reviewed by the Board every three (3) years or as required when internal or external events warrant a more frequent review to be undertaken.

This Code was adopted by the Board on 12 April 2022.