



I REIT MANAGERS SDN. BHD.

Registration No. 202101014501 (1414801-X)

**ANTI-BRIBERY AND ANTI-CORRUPTION
POLICY**

1. INTRODUCTION AND OBJECTIVE

This Anti-Bribery and Anti-Corruption Policy (“**Policy**”) sets out the position of I REIT Managers Sdn Bhd (“**I REIT**” or “**Manager**”), the management company of AME Real Estate Investment Trust (“**AME REIT**”), on bribery in all its forms and matters of corruption that might confront the Manager in its day to day operations. It provides information and guidance to Directors and Employees of the Manager (“**Directors**” and “**Employees**”) to recognise and deal with bribery and corruption issues.

This Policy 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, which include, but are not limited to, the Malaysian Anti-Corruption Commission Act 2009 (including any amendment thereof), the Manager’s Whistleblowing Policy and the Manager’s Code of Conduct and Ethics.

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. The Policy sets out the practice of upholding high levels of personal and professional conduct and values in the Manager’s business dealings and decisions.

2. THE MANAGER’S COMMITMENT

The Manager is committed to conducting its business dealings and the management of AME REIT with integrity. This includes avoiding practices of bribery and corruption of all forms in the daily operations of the Manager.

The Manager has adopted a zero-tolerance policy against all forms of bribery and corruption. Employees who refuse to pay or receive bribes or participate in acts of corruption will not be penalised even if such refusal may result in losing business.

3. APPLICABILITY

The Policy is applicable to all Directors and Employees (including full time, part-time, probationary, contract and temporary staffs) of the Manager and should also include consultants, contractors, trainees, seconded staff, volunteers, interns, agents, sponsors,

suppliers, customers, any third party and any other person associated with the Manager and/or AME REIT. Each Director or Employee as well as persons associated with the Manager and/or AME REIT has a duty to read and understand the Policy. Violation of any of the Policy's provisions can result in disciplinary actions, including termination of employment and/or business dealings.

If a Director requires further clarification on the Policy, the Director may refer to the Chairperson of the Board of Directors of the 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**").

4. BACKGROUND

This Policy has been established in line with Section 17A of the Malaysian Anti-Corruption Commission Act 2009 ("**MACC Act**"), which was enacted under the Malaysian Anti-Corruption Commission (Amendment) Act 2018. The said section took effect from 1 June 2020. Section 17A of the MACC Act provides that a commercial organization commits an offence if any person associated with the commercial organization commits a corrupt act in order to obtain or retain business or an advantage in the conduct of business for the commercial organization.

The term "commercial organization" means:-

- (a) a company incorporated in Malaysia, whether carrying on business in Malaysia or elsewhere;
- (b) a company wherever incorporated and carries on business in Malaysia or part of a business in Malaysia;
- (c) a partnership under the Partnership Act 1961 or Limited Liability Partnership Act 2012, and carries on a business in Malaysia or elsewhere; or
- (d) a partnership wherever formed and carries on a business or part of a business in Malaysia.

It is a defence to such corporate liability offence if it can show that it had adequate procedures in place to prevent persons associated with the commercial organization from carrying out the corrupt act.

The Guidelines on Adequate Procedures issued by the National Centre for Governance, Integrity and Anti-Corruption (GIACC) under the Prime Minister's Department on 4 December 2018 pursuant to Section 17A(5) of the MACC Act is aimed at assisting

commercial organizations understand the procedures which ought to be implemented to prevent corrupt practices in their business activities.

A person is associated with a commercial organization if he/she is a director or an employee of the commercial organization, or is a person who performs services for or on behalf of the commercial organization, which likely includes agents engaged by the commercial organization.

5. GUIDANCE ON COMMON FORMS OF BRIBERY AND CORRUPTION

5.1 Gifts, Entertainment and Hospitality

The Manager prohibits both the acceptance and provision of Gifts, Entertainment and Hospitality (“collectively referred to as the “**Benefits**”) to influence business decisions and/or to obtain and retain business or secure an unfair advantage in any business transaction.

No Benefits shall be offered to or solicited from other stakeholders who deal with the Manager and/or AME REIT in connection with their official duties if this would influence any business decision and/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, this Policy does not prohibit normal business courtesies such as meals and entertainment, occasional token gifts and customary gifts during festivals, special occasions or social events, as long as they are reasonable, appropriate, modest and bona fide corporate courtesies. 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.

Directors and Employees must make use of good judgment, discretion and moderation when giving or accepting such courtesies in business settings and must comply with all applicable laws, rules and regulations in countries which the Manager and/or AME REIT operates.

5.2 Charitable Donations and Sponsorships

The Manager encourages and supports charitable donations and sponsorships to individuals, organisations, communities and societies who require special help and care. However, Directors and Employees must be careful to ensure that charitable donations and sponsorships are not used as a scheme to conceal bribery. All charitable donations and sponsorships shall be approved by the Directors or the CEO.

5.3 Political Contributions

As a matter of general policy, the Manager does not make contributions to political parties or candidates. In very limited circumstances, if any contribution is to be made, it must be approved by the Directors or the CEO, permissible under applicable laws and must not be made with any promise or expectation of favourable treatment in return. Records of such contribution shall be properly maintained and kept by the Manager.

5.4 Facilitation Payments to Officer of Public Body

Facilitation payments are unofficial payments or other benefits made to secure or expedite the performance of a routine action by an officer of public body. Directors or Employees shall not promise or offer, or agree to give or offer, facilitation payments to an officer of any public body.

5.5 Conflicts 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 a material decision with respect to any transaction, contract or proposed contract or arrangement in which they are interested, directly or indirectly.

6. RECORD-KEEPING

The Manager shall control and maintain proper financial records of all payments made to third parties to serve as evidence that such payments are bona fide and not linked to corrupt and/or unethical conduct.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as customers, supplies and business contracts, should be prepared and maintained with strict accuracy and completeness.

7. REVIEW, MONITORING AND ENFORCEMENT

With an aim to ensure compliance and enforcement of this Policy, the Manager shall appoint a qualified and independent third party to conduct an audit on this Policy framework at least once every three years. Audit documentation should include performance improvement action plans.

8. TRAINING AND COMMUNICATION

The Manager shall conduct a timely refresher and awareness programme to all Directors and Employees to ensure they understand the Manager's anti-corruption position.

Training shall also be conducted on a regular basis, in accordance with the level of bribery and corruption risk related to the position. Training should be provided to individuals who are new to the Manager or newly appointed to or currently holding an exposed position.

9. REPORTING VIOLATIONS OF THE POLICY

Any employee who knows of, or suspects, a violation of the Policy, 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 Policy 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 Policy.

10. WAIVER OF THE POLICY

Waiver of the application of this Policy may be granted by the Board or the appropriate Board Committee of the Manager as it deems fit and appropriate.

11. REVIEW OF THE POLICY

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