



KLCC PROPERTY HOLDINGS BERHAD POLICY STATEMENT ON ANTI-BRIBERY AND CORRUPTION

We at KLCC Property Holdings Berhad (“KLCCP”) and its subsidiaries, including KLCC Real Estate Investment Trust (collectively referred to as “KLCCP Stapled Group”), are committed to applying the highest standards of integrity, ethical conduct and accountability in all our business activities and operations. This policy statement applies to all business dealings and relationships.

KLCCP Stapled Group upholds zero tolerance towards bribery and corruption in any form by its employees or any related persons acting on behalf of KLCCP Stapled Group.

KLCCP Stapled Group is committed to:

- **Comply with Code of Conduct and Business Ethics (“CoBE”);**
- **Comply with Anti-Bribery and Corruption Manual (“ABC Manual”);**
- **Comply with the requirements of Anti-Bribery Management System (“ABMS”); and**
- **Comply with the requirements of all applicable laws.**

The Board of Directors and Management of KLCCP Stapled Group are committed in implementing and enforcing effective and robust policies and procedures to monitor, detect, prevent, and eliminate bribery and corruption, and to the continual improvement of the ABMS. The Compliance Function of KLCCP Stapled Group is assigned with the responsibility and authority to oversee the implementation of the ABMS and compliance program with direct access to the Board and Management for issues relating to bribery and corruption.

Employees and others acting for and on behalf of KLCCP Stapled Group are strictly prohibited from directly or indirectly soliciting, accepting or offering bribes in relation to KLCCP Stapled Group’s business dealings and operations.

Employees must comply with CoBE, ABC Manual and/or applicable laws, failure to adhere to these policies and procedures will be subjected to appropriate consequence management.

KLCCP Stapled Group provides channel for employees and members of the public to disclose any improper conduct within KLCCP Stapled Group.

This policy statement shall be reviewed and updated from time to time in compliance with the requirements of all applicable laws.

A handwritten signature in black ink, appearing to read 'Datuk Md. Shah Mahmood'. The signature is stylized and fluid, with a horizontal line underneath it.

DATUK MD. SHAH MAHMOOD
Chief Executive Officer of KLCC Property Holdings Berhad
Dated: 1 November 2023



KLCC PROPERTY HOLDINGS BERHAD KENYATAAN DASAR MENGENAI ANTI-RASUAH DAN KORUPSI

Kami di KLCC Property Holdings Berhad ("KLCCP") dan anak syarikatnya, termasuk KLCC Real Estate Investment Trust (secara bersama disebut sebagai "KLCCP Stapled Group") dan anak syarikatnya, beriltizam untuk menerapkan tahap integriti, tingkah laku etika dan kebertanggungjawaban tertinggi dalam semua aktiviti perniagaan dan operasi syarikat-syarikat kami. Kenyataan dasar ini terpakai untuk semua urusan perniagaan dan rakan kongsi.

KLCCP Stapled Group berpegang teguh kepada prinsip anti-rasuah dan korupsi sifar dalam semua aspek oleh pekerjaanya atau rakan perniagaan yang bertindak bagi pihak KLCCP KLCCP Stapled Group.

KLCCP Stapled Group beriltizam untuk:

- Mematuhi Kod Tatakelakuan dan Etika Perniagaan [*Code of Conduct and Business Ethics* ("CoBE")];
- Mematuhi kehendak Manual Anti-Rasuah dan Korupsi [*Anti-Bribery and Corruption Manual* ("ABC Manual")];
- Mematuhi kehendak Sistem Pengurusan Anti-Rasuah [*Anti-Bribery Management System* ("ABMS")]; dan
- Mematuhi kehendak semua undang-undang yang terpakai.

Ahli Lembaga Pengarah dan pengurusan KLCCP Stapled Group beriltizam untuk menerap dan menguatkuasakan dasar dan prosedur yang berkesan dan mantap bagi mengesan, mencegah, memantau dan membanteras rasuah dan korupsi, serta meneruskan penambahbaikan ABMS secara berterusan. Unit Pematuhan (Compliance Function) KLCCP Stapled Group ditugaskan dengan tanggungjawab dan kuasa untuk mengawasi pelaksanaan ABMS dan program pematuhan, dengan akses terus kepada Lembaga Pengarah dan pihak pengurusan untuk isu-isu yang berkaitan dengan rasuah dan korupsi.

Pekerja dan pihak lain yang bertindak untuk dan bagi pihak KLCCP Stapled Group dilarang sama sekali untuk meminta, menerima atau menawarkan rasuah dalam sebarang urusan dan pengendalian perniagaan KLCCP Stapled Group.

Pekerja harus mematuhi CoBE, ABC Manual dan segala bentuk undang-undang negara, kegagalan mematuhi dan mengamalkan dasar serta prosedur ini akan menyebabkan tindakan tata-tertib diambil.

KLCCP Stapled Group menyediakan ruang bagi pekerja dan orang awam untuk melaporkan sebarang salah laku yang berlaku di dalam KLCCP Stapled Group.

Kenyataan dasar ini akan disemak dan dikemaskini dari semasa ke semasa sesuai dengan kehendak semua undang-undang yang terpakai.

A handwritten signature in black ink, appearing to read 'Datuk Md. Shah Mahmood', written over a horizontal line.

DATUK MD. SHAH MAHMOOD
Ketua Pegawai Eksekutif KLCC Property Holdings Berhad
Bertarikh: 1 November 2023