



KLCC Property Holdings Berhad

Anti-Bribery & Corruption Policy

We at KLCC Property Holdings Berhad ("KLCCP"), its subsidiaries, and 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 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 shall be reviewed and updated from time to time in compliance with the requirements of all applicable laws.

Datuk Sr. Mohd. Salem Kailany

Chief Executive Officer, KLCC Property Holdings Berhad

1 November 2024

KLCC Property Holdings Berhad

Polisi Anti-Rasuah & Anti-Korupsi



Kami di KLCC Property Holdings Berhad ("KLCCP"), anak syarikatnya, dan KLCC Real Estate Investment Trust (secara kolektif dirujuk sebagai "Kumpulan Stapled KLCCP") beriltizam untuk menerapkan tahap integriti, etika kerja, dan akauntabiliti yang tertinggi dalam semua aktiviti perniagaan dan operasi kami. Polisi ini terpakai untuk semua urusan perniagaan dan hubungan dengan pihak berkepentingan.

KLCCP Stapled Group berpegang teguh kepada prinsip toleransi sifar terhadap rasuah dan korupsi dalam apa jua bentuk oleh pekerja kami atau mana-mana pihak berkaitan yang bertindak bagi pihak KLCCP Stapled Group .

KLCCP Stapled Group komited untuk:

- Mematuhi Kod Tatakelakuan dan Etika Perniagaan (Code of Conduct and Business Ethics, "CoBE");
- Mematuhi 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.

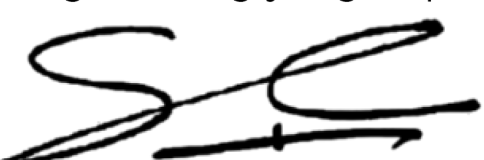
Ahli Lembaga Pengarah dan Pengurusan KLCCP Stapled Group beriltizam untuk melaksanakan dan menguatkuasakan polisi dan prosedur yang kukuh bagi mengesan, mencegah, memantau, dan membanteras rasuah dan korupsi, serta memastikan penambahbaikan berterusan ABMS. Unit Pematuhan (Compliance Function) diberi tanggungjawab dan kuasa untuk mengawasi pelaksanaan ABMS dan program pematuhan, dengan akses terus kepada Lembaga Pengarah dan Pengurusan untuk isu-isu berkaitan rasuah dan korupsi.

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

Pekerja wajib mematuhi CoBE, ABC Manual, dan undang-undang yang berkaitan. Kegagalan mematuhi polisi dan prosedur ini akan menyebabkan tindakan disiplin diambil.

KLCCP Stapled Group menyediakan saluran bagi pekerja dan orang awam untuk melaporkan sebarang salah laku dalam KLCCP Stapled Group.

Polisi ini akan disemak dan dikemaskini dari semasa ke semasa selaras dengan keperluan undang-undang yang terpakai.



Datuk Sr. Mohd. Salem Kailany

Ketua Pegawai Eksekutif, KLCC Property Holdings Berhad

1 November 2024