



**SURIA KLCC
SDN BHD
ANTI-BRIBERY
AND CORRUPTION
MANUAL**

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SURIA KLCC ANTI - BRIBERY AND CORRUPTION MANUAL

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INTRODUCTION

Suria KLCC Sdn. Bhd. (“SURIA KLCC”) has adopted a zero-tolerance policy against all forms of bribery and corruption. The Code of Conduct and Business Ethics (CoBE) sets out SURIA KLCC’s core principles in this regard. The Anti-Bribery and Corruption Policy and Guidelines (hereinafter referred to as the “ABC Manual”) elaborate upon those principles, providing guidance to employees concerning how to deal with improper solicitation, bribery and other corrupt activities and issues that may arise in the course of business. It is also intended to apply to every director (executive and non-executive) except as otherwise stated in this Policy and Guidelines.

SURIA KLCC also expects that contractors, subcontractors, consultants, agents, representatives and others performing work or services for or on behalf of SURIA KLCC will comply with the relevant parts of the ABC Manual when performing such work or services. This policy also applies to government agencies and local authorities who have dealings with SURIA KLCC in the normal course of business.

The Policy and Guidelines are not intended to provide definitive answers to all questions regarding bribery and corruption. Rather, they are intended to provide employees with a basic introduction to how SURIA KLCC combats bribery and corruption in furtherance of the company’s commitment to lawful and ethical behavior at all times. Some of the guidelines are designed to prevent situations in which bribery and corrupt practices may take root.

If you have any doubt about the scope of applicable laws or the application of the company’s policies concerning the fight against bribery and corruption, you should contact the Integrity & Compliance Department immediately.

“ALWAYS ASK WHENEVER IN DOUBT”

Engaging in bribery or corrupt practices can have severe consequences for you and SURIA KLCC. You may face dismissal, fines and imprisonment, and the company may face damage to reputation, financial loss and disbarment from business and other negative consequences.

An electronic version of this Policy and Guidelines is available at www.suriaklcc.com.my, www.alamanda.com.my and www.mesramall.com.my.

PART 1: APPLICATION AND DEFINITIONS

1A: APPLICATION

This ABC Manual is intended to apply to every employee of SURIA KLCC. It is also intended to apply to every director (executive and non-executive) except as otherwise stated in this Manual.

Although the ABC Manual is specifically written for SURIA KLCC employees and directors, SURIA KLCC expects that contractors, sub-contractors, consultants, agents, representatives and others performing work or services for or on behalf of SURIA KLCC will comply with it in relevant part when performing such work or services.

If a law conflicts with a policy as set out in this ABC Manual, you should comply with the law. If you perceive that a provision in this Manual conflicts with the law, you should consult with your Head of Department, Integrity & Compliance Department or Human Resource Department rather than disregard the Manual without consultation. If you have any questions about any of these conflicts, please consult your Head of Department, Integrity & Compliance Department or Human Resource Department.

1B: DEFINITIONS

References to “you” in this ABC Manual refer to any person to whom this Manual applies. Where more specific references are used (such as “employee”), the more specific reference is intended.

For purposes of this Manual, the term “family/household” includes your spouse(s), children (including step-children and adopted children), parents, step-parents, siblings, step-siblings, grandparents, grandchildren, in-laws, uncles, aunts, nieces, nephews, and first cousins, as well as other persons who are members of your household.

For purposes of this Manual, the term “employee” means any person who is in the employment of SURIA KLCC including but not limited to executives, non-executives, secretaries, secondees and individuals on direct hire.

The term “SURIA KLCC” means Suria KLCC Sdn. Bhd.

PART 2: GIFT, ENTERTAINMENT AND CORPORATE HOSPITALITY

2A: “NO GIFT” POLICY

SURIA KLCC has adopted a “No Gift Policy” whereby, subject only to certain narrow exceptions, SURIA KLCC employees and directors, family members or agents acting for or on behalf of SURIA KLCC employees, directors or their family members are prohibited from, directly or indirectly, receiving or providing gifts. Only in certain permitted situations, SURIA KLCC employees and directors, family members, or agents acting on behalf of SURIA KLCC may directly or indirectly, receive, and provide gifts. These gifts must be **non-cash in nature**.

Directors and employees acting on behalf of SURIA KLCC in receiving third party gifts in their official capacities are expected to exercise good judgment on every occasion, taking into account the relevant circumstances, amongst others, such as:

1. The nature of the gift and its purpose;
2. The positions of the persons providing and receiving the gift;
3. The business context and social norms (e.g. festive season);
4. Applicable laws, and SURIA KLCC’s approved policies.

Gifts received must be recorded, approved and not be intended to create an improper advantage or give the impression of giving improper advantage to the third party providing the gifts.

Whereas gifts provided must obtain prior approval and not be intended to create an improper advantage or give the impression of giving improper advantage to SURIA KLCC. All expenditures for gifts provided by SURIA KLCC must be accurately recorded in the financial statements.

SURIA KLCC requires employees and directors to abide by this policy to avoid conflict of interest or the appearance of conflict of interest for either party in on-going or potential business dealings between SURIA KLCC and external parties as gifts can be seen as a bribe/corruption that may tarnish SURIA KLCC’s reputation and/or be in violation of the anti-bribery and corruption laws.

As set out in the SURIA KLCC Code of Conduct and Business Ethics (CoBE), a conflict of interest arises in a situation in which an individual is in a position to take advantage of his or her role in SURIA KLCC for his or her personal benefit, including the benefit of his or her family/household and friends. This would undermine the duties of good faith, fidelity, diligence and integrity as expected by SURIA KLCC from its employees and directors in the performance of their duties and obligations.

It is the responsibility of employees and directors to inform external parties involved in any business dealings with SURIA KLCC of the Company’s No Gift Policy and to request the external party’s understanding for and adherence with this policy.

2A(i): Receiving Gifts

The Company is very much aware that the exchange of gifts can be a very delicate matter where, in certain cultures or situations, gift giving is a central part of business etiquette.

Although the general principle is to immediately refuse or return gifts, accepting such a gift on behalf of SURIA KLCC is allowed only in very limited circumstances, whereby refusing the gift is likely to seriously offend and may sever SURIA KLCC business relationship with the Third Party. **However, in no circumstances may an employee, director or his/her family/household members accept gifts in the form of cash or cash equivalent. (e.g. cryptocurrency, shares, paid vacations, gift cards, gift certificates, scholarships).** As accepting such gift or providing such gifts could be real or perceived conflicts of interest, or at worst could be alleged to be as bribes or corruption.

In these limited circumstances, employees are expected to immediately record the gift in the **Gift Declaration Logbook** and **Gift Declaration Form** for submission to Integrity & Compliance Department. For gifts RM750 and below, Integrity & Compliance Department will decide whether to approve the acceptance. If the Gift is above RM750, both Integrity & Compliance and Human Resources Department will jointly decide whether to approve the acceptance. Without joint approval, the gift must be returned. Directors should inform the Chairman of the SURIA KLCC Board, as soon as reasonably practicable, to seek his/her advice when faced with a similar situation and record the gifts in the Gift Declaration Logbook and Gift Declaration Form.

Even if it may appear disrespectful to refuse a gift from an external party, nevertheless, if there is a conflict of interest or may arise allegations of bribes or corruption situation (e.g. procurement bidding or sourcing for potential tenants is in progress and the company that gave the gift is one of the bidders or potential tenants) then clearly the company cannot approve the acceptance of said gift (in the case of directors, the Chairman would advise the same). In this situation, **the gift must be politely returned with a note of explanation about the Company's No Gift policy.**

In the event Integrity & Compliance Department and Human Resources Department jointly rejects / approves the acceptance of the gift, both must also determine the treatment of the gift whether to:

- a) Share with other employees in the department; or
- b) Permit it to be retained by the employee: or
- c) Donate the gift to charity; or
- d) Hold it for departmental display; or
- e) Return the Gift.

In determining the above, Integrity & Compliance Department and Human Resources Department are expected to exercise proper care and judgment in each case, taking into account pertinent circumstances including the character of the gift, its purpose, the position/ seniority of the person(s) providing the gift, the business context, reciprocity, applicable laws and cultural norms.

2A(ii): Providing of Gifts

Employees are prohibited from providing gifts to third parties outside of the permitted situations listed except for the following situations below:-

- a) Gifts from SURIA KLCC to employees and directors and/or their family members in relation to an internal or externally recognised Company function, event and celebration (e.g. in recognition of an employee's/director's service to the Company);
- b) Token gifts of nominal value normally bearing the SURIA KLCC or company's logo (e.g. t-shirts, pens, diaries, calendars, and other small promotional items) that are given out equally to members of the public, delegates, tenants, partners and key stakeholders attending events such as conferences, exhibitions, training, trade shows, meetings etc. and deemed as part of the company's brand building or promotional activities. This also includes non-cash gifts to shoppers for spending above a certain amount and door gifts to visitors during promotional period/festive season are deemed as part of the company's brand building or promotional activities; and
- c) Non-cash gifts with value of below RM1,000 for new tenants' outlet opening (e.g. flowers bouquet).

2A(iii): Receiving of Gifts

The receiving and provision of gifts are permitted in the following situations:-

- a) Non-Cash Gifts (valued below RM1,000) can be accepted and must be recorded in the Gift Declaration Logbook and Gift Declaration Form;
- b) Periodic offers or discounts from tenants to all employees of SURIA KLCC that would also be offered to customers (e.g. VIP customer cards etc);

Even in the above exceptional circumstances, employees and directors are expected to exercise proper judgment in handling gift activities and behave in a manner consistent with the general principles set out in the CoBE as per below:

- Conscientiously maintain the highest degree of **integrity**,
- Always exercise **proper care and judgment**,
- **Avoid conflicts of interest or appearance of bias**,
- **Refrain** from creating circumstances which could appear to influence a business decision, negotiation or transaction,
- **Refrain** from taking advantage of your position or exercising your authority to further your own personal interest at the expense of SURIA KLCC, and
- **Comply** with applicable laws, regulations and SURIA KLCC policies and procedures.

In providing a guide to each employee and/or director in exercising proper care and judgement they should **ask** these questions:

- Is the gift prohibited by local law?
- Could it be interpreted as a bribe or corruption?
- Is it in line with our (or their) gift policy?
- Could it influence a business decision?
- How would it be perceived if it were publicly disclosed?

If any of these questions raise doubts, you should speak to your Head of Department, Integrity & Compliance Department or Human Resource Department for guidance.

SURIA KLCC' RECEIVING GIFT POLICY

As a general principle, SURIA KLCC employees and directors are prohibited from, directly or indirectly, receiving gifts above RM1,000 to avoid conflict of interest or the appearance of conflict of interest.

THE GENERAL RULE

Third Party

Provide gifts or offers
to provide gifts.
>RM1,000
Or
Provides cash / cash
equivalent



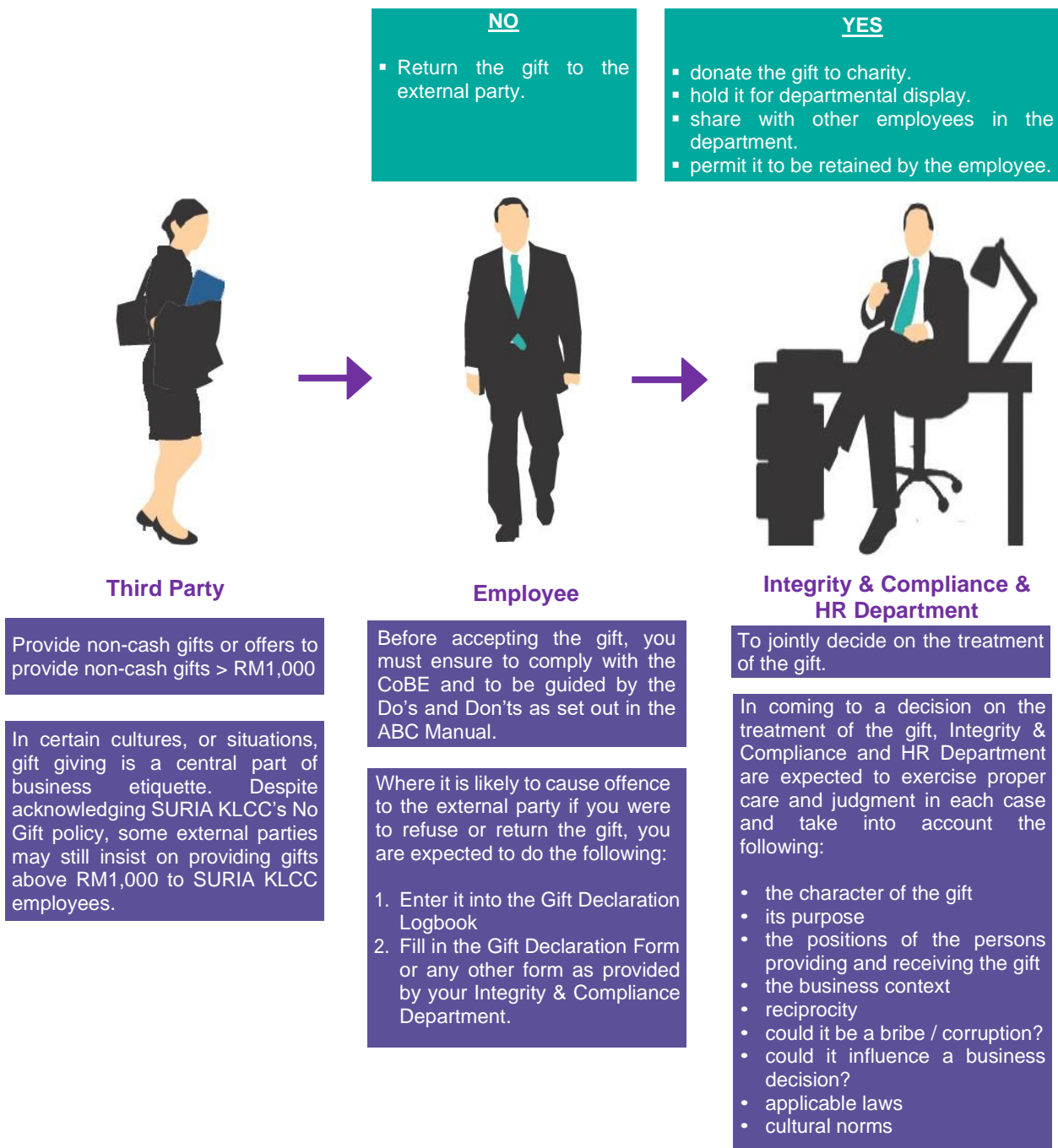
Employee

Politely declines
gifts.

GIFT ACTIVITY REPORTING AND APPROVAL PROCESS

The below depicts the process flow for reporting a gift which value is above RM1,000 accepted on behalf of SURIA KLCC (only allowed in very limited circumstances) whereby refusing the gift is likely to seriously offend and may sever SURIA KLCC business relationship with the Third Party.

EXCEPTIONAL CASES (IN VERY LIMITED CIRCUMSTANCES AND SUBJECT TO APPROVAL)



Refer to the DO's and DON'Ts below:

DO's

- ✓ SURIA KLCC employees and directors must inform third parties involved in business dealings with SURIA KLCC that the Company practices a No Gift Policy and to request the aforementioned parties to respect and adhere with the Company policy.
- ✓ SURIA KLCC employees and directors are prohibited from accepting or providing gifts to third parties unless it falls under the general exceptions provided under the policy as stated in paragraph 2A (ii) and 2A (iii).
- ✓ SURIA KLCC employees & directors must exercise proper care and judgment when handling gift activities and apply the general CoBE principles in determining the appropriateness of the gift, in particular when dealing with public officials and public agencies/bodies as strict rules apply.
- ✓ Employees are required to fill in the Gift Declaration Book and submit the Gift Declaration Form to Integrity & Compliance Department who will then decide whether to approve the acceptance of the gift or require the gift to be returned.

DON'Ts

There are certain types of gifts which are never permissible and SURIA KLCC employees and directors should immediately refuse if it involves the following:-

- ✗ Any gift of cash or cash equivalent. Cash equivalent could be in the form of cryptocurrency, shares, paid vacations, gift cards, gift certificates and scholarships etc.
- ✗ Any gifts involving parties engaged in a tender or leasing competitive bidding exercise.
- ✗ Any gifts that comes with a direct/ indirect suggestion, hint, understanding or implication that in return for the gift, some expected or desirable outcome is required ("quid pro quo").
- ✗ Any gift that would be illegal or in breach of local anti-bribery and corruption laws.
- ✗ Any gift which is lavish or excessive e.g. valued above the maximum threshold permitted by the Company or may adversely affect the reputation of SURIA KLCC.

You must immediately return or decline any gift that falls within the abovementioned categories.

2A(iv) Sample of Declaration Form for Receiving Gifts

Section A – To Be Completed By Employee Making The Declaration				
I) Employee's Particulars				
Name:		Position / Department		
II) Declaration Description				
No.	Date Received:	Sender's Name / Organisation	Description of Gift	Estimate Value (RM)
1.				
2.				
3.				
III) By accepting the gift, does it fall under the following scenario: a) Any Gift that comes with a direct/indirect hint that in return, some favour is expected ("quid pro quo") or b) Any Gift that would be illegal or in breach of Malaysian Anti-Bribery and Corruption laws or c) Any Gift which is lavish or excessive. (If either is answered YES, then the gift must be declined and be returned.)				
IV) Please provide appropriate reason(s) for accepting the gift:				
Signature of Employee: _____				

Section B – Approval By Integrity & Compliance Department				Serial No.
Valuation for Gift(s) received RM750 and below.				
No.	Date Received:	Estimated Value (RM)	Source of Valuation	Decision – Accept / Decline / Others (please specify)
1.				
2.				
3.				
Date:		Name:		
Signature:				
Remarks (If any):				

Section C – Joint Approval By Head of Human Resources (HR) Department & I&C Department		
To be filled when the gift value is above RM750.		
Description	Head of HR	Head of I&C
Date:		
Name:		
Signature:		
Decision – Accept / Decline / Others (please specify)		
Remarks (If any):		

2B(i): Providing Entertainment

SURIA KLCC recognises that providing modest entertainment is a legitimate way of building business relationships and as such a common practice within the business environment to foster good business relationship with external parties. As such, **eligible employees are allowed to entertain external parties through a reasonable act of hospitality as part of business networking as well as a measure of goodwill towards the recipients.**

In certain cultures, the act of hospitality through entertainment is a central part of business etiquette. However, this may not necessarily be the case in all circumstances as it may create a negative perception if observed or known by others despite selfless motives behind the entertainment provided.

Employees and directors should always bear in mind that this is an area where perception is often regarded as more important than facts and therefore you should **always exercise proper care and judgment when providing entertainment to third parties especially when it involves public officials** to ensure compliance with local anti-bribery and corruption laws.

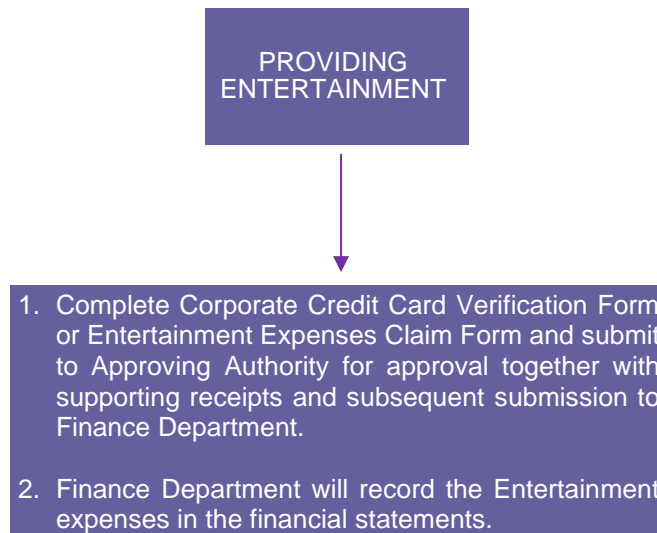
Employees and directors are strictly prohibited from providing or offering to provide entertainment with a view to improperly cause undue influence on any party in exchange for some future benefit or result. Any acts of this nature, whether provided directly or indirectly through an intermediary, may be construed as an act of bribery / corruption and contrary to the general values and principles of the CoBE.

You are required to comply with the policies and procedures of your Human Resource Department and maintain expenses within the limits of your approved budget, when carrying out entertainment activities.

As set forth in Part II B paragraph 12.2 of the CoBE, any entertainment activities that would involve public officials shall require the prior approval of the approving authority in consultation with the Integrity & Compliance Department.

Specific rules governing employees' conduct when dealing with Public Officials is set out in greater detail in Part 3 of this ABC Manual. Directors (executive and non-executive) are also expected to abide by the same rules.

The below chart illustrates the process flow for reporting an Entertainment Activity for eligible employees:



2B(ii): Receiving Entertainment

SURIA KLCC recognises that the occasional acceptance of a reasonable and modest level of entertainment provided by third parties in the normal course of business is a **legitimate way to network** and build good business relationships.

However, it is important for employees and directors to **exercise proper care and judgment before accepting entertainment offered or provided by a third party**. This is not only to safeguard the Company's reputation, but also to protect employees and directors from allegations of impropriety or undue influence.

As set forth in Part II B paragraph 10.2 of the CoBE, in no event, however, may you or any of your family/household members accept entertainment in exchange for an exercise or non-exercise of your SURIA KLCC authority or otherwise to the detriment of SURIA KLCC.

Refer to the DO's and DON'Ts below:

DO's

- ✓ SURIA KLCC employees and directors must ensure that the entertainment offered is legitimate, modest and not lavish or excessive or extraordinary.
- ✓ SURIA KLCC employees and directors are prohibited from offering or providing entertainment with a view to improperly creating undue influence on any party in exchange for some future benefit or result. Any acts of this nature, whether directly or indirectly, may be construed as an act of bribery that is contrary to the general principles of the CoBE.
- ✓ You must be aware and educate yourself on anti-bribery and corruption laws when dealing with public officials as providing entertainment to public officials has the potential to be regarded as bribery.
- ✓ Eligible employees are required to comply with the policies and procedures of their Human Resource Department, and maintain expenses within the limits of their entitlement, when carrying out entertainment activities.
- ✓ Any entertainment activities that would involve public officials shall require the prior approval of the respective approving authority in consultation with the Integrity and Compliance Department.

DON'Ts

There are certain types of entertainment activities which are never permissible and you should immediately refuse if it involves the following:-

- ✗ Any entertainment that comes with a direct/indirect suggestion, hint, understanding or implication that in return for the entertainment provided some expected or desirable outcome is required ("quid pro quo").
- ✗ Any entertainment activities that would be illegal or in breach of local or foreign bribery laws.
- ✗ Any entertainment activities that would be perceived as extravagant, lavish or excessive or may adversely affect the reputation of SURIA KLCC or creates an appearance of bias.
- ✗ Any entertainment activity that intent to influence a business decision, negotiation or transaction or is sexually oriented or may otherwise tarnish the reputation of SURIA KLCC.

You must immediately decline any offers of entertainment that falls within the above categories.

2C(i): Corporate Hospitality

Corporate hospitality is generally defined as “corporate events or activities organised by an organisation which involves the entertainment of employees and third parties for the benefit of that organisation”. Third parties may include tenants, potential tenants, contractors, external companies and any other stakeholders with whom a business relationship, whether current, prospective or historic exists.

Corporate events and activities include but are not limited to sporting events, gala dinners, concerts or activity-based events such as golf tournaments.

Corporate hospitality is recognised as a legitimate way to network and build goodwill in business relationships. However, there is a fine line between what is considered to be legitimate vs. illegitimate forms of corporate hospitality. The question is whether there is any intention to influence or be perceived to influence the improper outcome of a business decision by providing the corporate hospitality.

Corporate hospitality would be illegitimate in the following situations:-

- If it provides an advantage to another person if offered; or
- If it is given with the intention of inducing the person to perform a relevant function improperly; or
- If there is knowledge that acceptance of the advantage would in itself be improper performance.

Transparency International has advocated corporate hospitality arrangements/activities should conform to the following basic principles:

- Transparency, in that all corporate hospitality is reported and written approval is obtained, all records of which are properly kept;
- Proportionality i.e. the corporate hospitality must not be too excessive. In addition, the corporate hospitality must commensurate with the recipient’s official capacity and not provided in his/her personal capacity;
- Reasonableness in ensuring that the corporate hospitality is not lavish; and
- Bona fide, where the intention to offer and/or provide the corporate hospitality is done with good and legal intentions.

2C(ii): Providing Corporate Hospitality

It is SURIA KLCC's policy not to provide corporate hospitality.

2C(iii): Receiving Corporate Hospitality

As a general principle, SURIA KLCC strictly prohibits employees and directors from soliciting corporate hospitality nor are they allowed to accept hospitality that is excessive, inappropriate, illegal or given in response to, in anticipation of, or to influence a favourable business decision, particularly from parties engaged in a procurement tender exercise (for e.g. contractors, vendors, suppliers etc.) or leasing competitive bidding by potential tenants.

Notwithstanding the above, **SURIA KLCC recognises that the occasional acceptance of an appropriate level of hospitality given in the normal course of business is usually a legitimate contribution to building good business relationships.** However, it is important for employees and directors to exercise proper care and judgement before accepting the hospitality. This is not only to safeguard the Company's reputation, but also to protect employees and directors from allegations of impropriety or undue influence.

SURIA KLCC will bear the cost of travelling and accommodation for employee to attend approved corporate hospitality events (locally and overseas). It is prohibited to accept sponsorship of travelling and accommodation by a 3rd party. (e.g. air fare, hotel room.)

If you have any doubts on the appropriateness of a corporate hospitality offered by an external party for e.g. a contractor or supplier, you should either decline the offer or consult the approving authority or Integrity & Compliance Department. In the case of directors (executive and non-executive), you should seek the advice of the Chairman.

Refer to the DO's and DON'Ts below:

DO's

- ✓ You must ensure that the corporate hospitality accepted from an external party is legitimate, modest and not lavish or excessive or extraordinary in nature.
- ✓ You must exercise proper care and judgment before offering or providing corporate hospitality to third parties to ensure compliance with applicable laws and regulations, in particular when it involves public officials.
- ✓ Any corporate hospitality activities that would involve public officials shall require the prior approval of the approving authority or Integrity & Compliance Department.
- ✓ If you have any doubts whether the corporate hospitality offered by an external party for e.g. a contractor or supplier is appropriate or reasonable in nature, you should either decline the offer or consult your approving authority or Integrity & Compliance Department.

DON'Ts

There are certain types of corporate hospitality activities which are never permissible and you should immediately refuse if it involves the following:-

- ✗ Corporate hospitality offered by parties currently engaged in a SURIA KLCC tender or leasing competitive bidding exercise.
- ✗ Corporate hospitality offered that comes with a direct/indirect suggestion, hint, understanding or implication that in return for the corporate hospitality provided some expected or desirable outcome is required ("quid pro quo").
- ✗ Any corporate hospitality activities that would be illegal or in breach of local or foreign bribery laws.
- ✗ Corporate hospitality which is lavish or excessive or may adversely affect the reputation of SURIA KLCC or creates an appearance of bias.
- ✗ Any corporate hospitality activities that activity that intent to influence a business decision, negotiation or transaction or is sexually oriented or may otherwise are sexually oriented or may otherwise tarnish the reputation of SURIA KLCC.

You must immediately decline any offers of corporate hospitality that falls within the above categories

PART 3: DEALING WITH PUBLIC OFFICIALS

3A(i): Dealing with Public Officials

A 'public or government official' is defined in Part II B paragraph 12.8 of the CoBE which includes, without limitation, candidates for public office, officials of any political party and officials of state owned enterprises other than KLCC Property Holdings Berhad or PETRONAS.

Caution must be exercised when dealing with public officials (e.g. Providing gifts, entertainment or corporate hospitality to public officials or their family/ household members).

As stated in Part II B paragraph 12.3 of the CoBE, **you are prohibited from paying for any travel and hospitality for any government official or his/her family/household members.** Other SURIA KLCC policies and procedures on gift, entertainment and corporate hospitality must also be abided by copies of which can be obtained from your Integrity & Compliance or Human Resource Department.

Refer to the DO's and DON'Ts below:

DO's

- ✓ Do ensure that to provide or to offer to provide entertainment to public officials is lawful under local laws,
- ✓ Do ensure that proper care and judgment is exercised to confirm that there is no conflict of interest. It is unethical to offer or provide entertainment in exchange for some future benefit or result.
- ✓ Do ensure that due diligence is carried out to confirm that the Public Official is the appropriate person based on his/ her official position. Any entertainment extended must be commensurate with the public official's official position and not based on his/her popularity, political standing or your familiarity with the public official.
- ✓ Do ensure that the entertainment provided to the public official is reasonable and modest in value, and commensurate with the official designation of the public official. This is to avoid any perception of bribery.
- ✓ Do ensure that any 'red flag' is resolved before giving out gift or entertainment.
- ✓ Do ensure that all documentation (including invoices and receipts) is properly recorded and kept.

DON'Ts

- ✗ Do not try to circumvent any laws or policies with regards to gifts and entertainment, even if it means that SURIA KLCC might lose out on business opportunities as a result.
- ✗ Do not be too complacent with certain public officials or local customs that you might think you are familiar with. Do not fail to check that there are no changes to local laws or company policies.
- ✗ Do not approve any requests by the public official to transfer the gift or entertainment to his family members or friends that are not authorized to accept the gift or entertainment. Doing so might be perceived as bribery even with the least strict of laws or policies. Kindly advise the public official that 'transfer' of gifts or entertainment is against SURIA KLCC policy.
- ✗ Do not offer to provide gifts, entertainment or hospitality that are illegal or unduly dangerous, indecent, sexually oriented or disrespectful.
- ✗ Do not act on your own accord when providing entertainment to public officials. Always consult your approving authority or the Integrity & Compliance Department.
- ✗ Do not conceal, alter, destroy or otherwise modify any documentation that relates to entertainment or corporate hospitality accorded to public officials.

PART 4: CORPORATE SOCIAL RESPONSIBILITY (CSR), SPONSORSHIPS AND DONATIONS

As a responsible corporate citizen, SURIA KLCC is committed to contributing to the well-being Malaysians. It is however important that all Corporate Social Responsibility (CSR), sponsorships and donations are made in accordance with SURIA KLCC policies and receive prior authorization by the approving authority.

The proposed recipient must meet the following criteria:

- Registered with the Malaysian authorities such as Register of Societies;
- Operate in Malaysia and demonstrate positive impact such as helping underprivileged communities or environmental conservation;
- Not directly or indirectly affiliated with any Public Officials, political parties, government agencies or local authorities;
- Appropriate due diligence must be conducted to ascertain the recipient's reputation, track record and whether any Public Officials or political parties are affiliated with the recipient.
- Does not breach any laws or company policies
- The request does not fall under the list of activities which SURIA KLCC does not support or contribute to which are:
 - (a) Political parties and organizations for religious purposes;
 - (b) Gambling, alcohol and tobacco;
 - (c) Societies, companies and NGOs blacklisted by the Malaysian government;

4A: CORPORATE SOCIAL RESPONSIBILITY (CSR)

As part of our commitment to corporate social responsibility and sustainable development, as a general matter, SURIA KLCC provides such assistance in appropriate circumstances and in an appropriate manner. However, such requests must be carefully examined for legitimacy and not be made to create any improperly influence a business outcome, conflict of interest or any bias.

Any red flags must be resolved before committing any funds to the programme. Requests determined to be legitimate and subsequently approved **must be structured to ensure funds reach the recipient**. If you are in any doubt as to whether a charitable contribution or social benefit is appropriate, consult the Integrity & Compliance Department for assistance.

4B: SPONSORSHIPS AND DONATIONS

As set out in the CoBE, employees must ensure that all sponsorships and donations are not used as a subterfuge for bribery or used to circumvent or avoid any of the provisions of the CoBE, including in particular, the prohibition on bribery.

SURIA KLCC needs to be certain that donations to charities or beneficiaries are not disguised illegal payments to government officials and must ensure that the charity does not act as a conduit to fund illegal activities in violation of anti-money laundering, anti-terrorism and other applicable laws.

In accordance with SURIA KLCC's commitment to contribute to the community coupled with its values of integrity and transparency, all sponsorships and donations must comply with the following:

- ensure such contributions are allowed by applicable laws;
- obtain approval of approving authority;
- be made to well established entities having an adequate organisational structure to guarantee proper administration of the funds;
- be accurately stated in the company's accounting books and records;
- not to be used as a means to cover up an undue payment, undue influence or bribery / corruption;

Examples of red flags to look out for are as follows:

- The proposed recipient/organisation has affiliations with a Public Official or their relatives or a political party;
- The contribution is made on behalf of a Public Official;
- There is a risk of a perceived improper advantage for SURIA KLCC;
- The proposed recipient has a reputation of improper practices or is under investigation

SURIA KLCC requires employees to use good judgment and common sense in assessing the requests. When in doubt, employees should seek further advice from the Integrity & Compliance Department to determine the authenticity of such requests.

4B(i): Due Diligence Checklist

Before making a commitment to a CSR activity, sponsorship or donation requested by external stakeholders, you must first conduct proper due diligence to ensure that the requests are legitimate and that any red flags raised are resolved prior to committing the funds.

The request is evaluated and meets the following criteria:-

- The request does not fall under the list of activities which SURIA KLCC does not support or contribute to;
- There is no risk of a perceived improper advantage for SURIA KLCC;
- The proposed recipient is a legitimate organisation and proper due diligence are made/ background checks;
- The proposed recipient /organisation does not have affiliations with a Public Official.

If the request meets the above requirements and it is reasonably ascertained to be legitimate in nature, you can proceed to prepare a recommendation/ memorandum seeking the approving authority approval.

If the proposed recipient is Government owned or if a Government Official or their relative is involved and it is reasonably expected that SURIA KLCC may have business that could be influenced by that Government Official or the Government Official's agency, ministry or department, the request must be politely declined.

Refer to the DO's and DON'Ts below:

DO's

- ✓ Ensure that the activity is in line with SURIA KLCC policy and guidelines on CSR, sponsorships and donations and does not fall under the list of CSR activities which SURIA KLCC does not support or contribute to. In case of any doubts, please refer to Integrity & Compliance Department.
- ✓ Ensure that the request has been carefully examined for legitimacy and that an appropriate level of due diligence has been conducted on the requesting party.
- ✓ Ensure that the proposed recipient is a legitimate organisation and the funding of the CSR activity is in compliance with the applicable laws and not made to improperly influence a business outcome or perceived to provide an improper advantage to SURIA KLCC.
- ✓ If the proposed recipient is Government owned or involves a Government Official or their relatives, the request must be politely declined.
- ✓ Any red flags must be resolved before committing any funds to the programme.

DON'Ts

- ✗ Do not commit any funds without first undergoing the proper processes and procedures to evaluate the legitimacy of the request.
- ✗ Do not try to circumvent any guidelines, rules or procedures put in place by making charitable contributions as a subterfuge for illegal payments.
- ✗ Do not conceal, alter, destroy or otherwise modify any relevant information, which in the normal course of business, may raise potential red flags that would require additional investigation, particularly if it involves public officials. If you are unsure or have any concerns, please consult your approving authority, Integrity & Compliance Department or Human Resources Department.

PART 5: POLITICAL CONTRIBUTIONS

5A: POLITICAL CONTRIBUTIONS

SURIA KLCC and employees acting on behalf of SURIA KLCC are prohibited from making or offering to make any monetary or in-kind political contributions to political parties, political party officials or candidates for political office politically linked organisations, political campaign, or any person or entity acting on behalf of the foregoing.

Payments to a government entity such as payments required by contract or law, are not prohibited, so long as they are made with due care to the government entity and not to any individual official.

The Company encourages employees to participate in the political election process by voting. Employees may choose to make personal political contributions as appropriate within the limits established by law but under no circumstances should they make any representation that they are doing so on behalf of or with the support of SURIA KLCC. Under no circumstances, however, will any employee be compensated or reimbursed in any way by the Company for a personal political contribution.

Furthermore, charitable donations may not be used as a subterfuge for prohibited political payments or to camouflage bribery.

Notwithstanding the foregoing, it is SURIA KLCC's policy to engage and communicate its views and position on issues of public interest that have an important impact on the Company.

Refer to the DO's and DON'Ts below:

DO'S

- ✓ Be aware and educate yourself with all applicable laws and regulations that may prohibit or restrict companies from getting involved in political activities, make political contributions or engage in lobbying activities.
- ✓ Make clear that your political views are your own when engaging in personal political activity and it does not reflect the views of SURIA KLCC.
- ✓ If you plan to seek or accept a public office, you will need to comply with the policies and procedures of the Human Resource Department.

DON'Ts

- ✗ You are prohibited from using your position with SURIA KLCC to try to influence any other person (whether or not employed by SURIA KLCC) to make political contributions or to support politicians or their parties.
- ✗ You are prohibited from making any contribution or incurring any expenditure using SURIA KLCC resources to benefit any political campaign, party or politician in any country.
- ✗ SURIA KLCC facilities, equipment and resources may not be used for the furtherance of any political campaigns or party functions.
- ✗ Charitable donations may not be used as a subterfuge for prohibited political payments.

PART 6: MAKING & RECEIVING FACILITATION PAYMENT

6A: MAKING & RECEIVING FACILITATION PAYMENTS

“Facilitation payment” is defined in Paragraph 7.2 in Part II B of the CoBE as payments made to secure or expedite the performance by a person performing a routine or administrative duty or function. **Offering, promising or requesting facilitation payments is just as prohibited as actually paying or receiving facilitation payments.** Facilitation payments need not involve cash or other financial asset; it can be any sort of advantage with the intention to influence them in their duties.

SURIA KLCC prohibits accepting or obtaining, either directly or indirectly, facilitation payments from any person for the benefit of the employee himself or for any other person who is subject to the CoBE. The reason underlying this prohibition is that facilitation payment is seen as a form of bribery and corruption. This prohibition is clearly laid out in Paragraph 7.1 of Part II B of the CoBE.

All persons subject to the CoBE must not offer, promise, give, request, accept or receive anything which might reasonably be regarded as a facilitation payment. **If you receive a request or if you are offered facilitation payments, you must immediately refuse and report it to the Integrity & Compliance Department.**

PART 7: MONEY LAUNDERING

7A: MONEY LAUNDERING

Paragraph 13.2 of Part II B of the CoBE defines money laundering as occurring when the criminal origin or nature of money or assets is hidden in legitimate business dealings or when legitimate funds are used to support criminal activities, including financing terrorism.

SURIA KLCC strongly objects to practices related to money laundering, including dealing in the proceeds of criminal activities.

Money laundering is a very serious crime and the laws governing this type of crime can have extra territorial effect, i.e. the application of the law is extended beyond local borders. The penalties for breaching anti-money laundering legislation are severe and can include extradition and incarceration in foreign jurisdictions.

To avoid violating anti-money laundering laws, employees are expected to always conduct counterparty due diligence to understand the business and background of SURIA KLCC's prospective business counterparties.

Counterparty means any party that SURIA KLCC is currently in relationship with or intends to do business within the future, either on a regular or once-off basis. Counterparties include but are not limited to tenants, contractors, suppliers, service providers, consultants, agents, JV partners and any other business partners.

A number of initiatives can be taken to strengthen anti-money laundering governance, they include the following:-

- Conducting appropriate risk assessment and due diligence on 3rd parties.
- Adequate training and compliance programs should be conducted to ensure understanding and strict compliance to any internal due diligence policies.
- Employees frequently involved in decision making process concerning counterparties particularly in matters on financial transactions should be properly acquainted with the applicable laws and regulations related to money laundering.
- Employees should be attentive to and report suspicious behaviour by tenants, consultants and business partners using proper reporting channels. Integrity & Compliance employee should always be consulted.
- Refusing convoluted payment arrangements such as payment in cash, payment to a third party or to accounts in other countries or unjustified requests for upfront payment for expenses or other fees.
- Periodic audits should be conducted and a process should be developed to follow all available accounting, record-keeping and financial reporting requirements applicable to cash and payments in connection with other transactions and contracts.

PART 8: DEALING WITH THIRD PARTIES

8A: DEALING WITH THIRD PARTIES

SURIA KLCC's dealings with third parties, which include tenants, service providers, contractors, suppliers, agents, consultants, joint venture partners, introducers/government intermediaries etc., must be carried out in compliance with all relevant laws and consistent with the values and principles of the CoBE. As part of this commitment, all forms of bribery and corruption are unacceptable and will not be tolerated.

SURIA KLCC expects that all third parties acting for or on its behalf to share the Company's values and ethical standards as their actions can implicate SURIA KLCC legally and tarnish the Company's reputation. Therefore, where we engage third parties, such as contractors, agents, consultants, intermediaries or joint venture partners, we are obligated to conduct appropriate counterparty due diligence to understand the business and background of SURIA KLCC's prospective business counterparties before entering into any arrangements with them to ensure that we are dealing with counterparties that subscribe to acceptable standard of integrity in the conduct of their business.

To help ensure that we only do business with third parties that share SURIA KLCC's standards of integrity, we must do the following:

- Conduct due diligence to assess the integrity of SURIA KLCC's prospective business counterparties (E.g. tenants, service providers, contractors, suppliers) and 3rd parties engaged to represent SURIA KLCC in dealing with government departments. Do not enter into any business dealings with any third party reasonably suspected of engaging in bribery and improper business practices unless those suspicions are investigated and resolved.
- All third parties are made aware of the SURIA KLCC's Code of Conduct and Business Ethics (CoBE) and ABC Policy and our expectations of them.
- Continue to be aware of and to periodically monitor third party performance and business practices to ensure ongoing compliance.
- Terminate any contractual relationships with 3rd parties whom are in breach with any of SURIA KLCC's policies.

If at any point during the due diligence exercise or in the dealings with a third party, there are conflicts of interest or “red flags” are raised, these warrant further investigation and must be sufficiently addressed before the engagement of the third party can progress.

Examples of common “red flags” involving third parties include:

- The transaction involves a country known for a high incidence of corrupt payments.
- Family, business or other “special” ties with government or public officials.
- A reference check reveals a flawed background or a reputation for getting “things done” regardless of the circumstances or suggests that for a certain amount of money, he can fix the problem.
- Objection to anti-bribery representations and warranties in commercial agreements or negative response when told of such requirements.
- Convoluted payment arrangements such as payment in cash, payment to a third party or to accounts in other countries or requests for upfront payment for expenses or other fees.
- The third party requires that his/her identity not be disclosed as part of the business transaction.
- Inadequate credentials for the nature of the engagement or lack of an office or an established place of business.

SURIA KLCC’s requires its employees to use good judgment and common sense in assessing the integrity and ethical business practices of third parties and have provided the above as a guideline.

Employees should seek advice from the Integrity & Compliance Department whenever particular questions arise relating to third parties that the Company has appointed or is considering appointing.

8B(i): Dealing With Tenants

SURIA KLCC must ensure that all leasing activities are in line with the leasing policies and procedures that are applicable, which include:

- Due diligence of tenants are undertaken before tenancy agreement is signed with SURIA KLCC.
- Due diligence of existing tenants are carried out prior to renewal of tenancy agreements.
- Documents relating to business registration, identity of directors and shareholders and company profile are obtained.
- Tenants are made aware of and understand the CoBE, ABC Manual and Whistleblowing Policy and Procedures.

8B(ii): Dealing With Contractors, Suppliers and Consultants

In line with the general principles of the CoBE, SURIA KLCC is committed to uphold the highest standard of ethics and integrity in all aspects of its procurement activities.

SURIA KLCC should avoid dealing with any contractors, suppliers or consultants known or reasonably suspected of corrupt practices or known or reasonably suspected to pay bribes.

SURIA KLCC must ensure that all procurement activities are in line with the procurement policies and procedures that are applicable, which include:

- Due diligence of contractors, suppliers and consultants for purchases or contracts are undertaken before they are registered with SURIA KLCC.
- Contractors, Suppliers and Consultants are made aware of and understand the CoBE, ABC Manual and Whistleblowing Policy and Procedure and that they will comply accordingly.
- All commercial contracts and invitations to bid (ITBs) incorporate the provisions relating to business conduct, conflict of interest and fighting corruption and unethical practices.

SURIA KLCC must enquire prospective contractors and suppliers to confirm whether or not these external parties have in place anti-bribery programmes and that they will not engage in any improper practices.

Screening should be conducted on the company, its directors, top management and controlling shareholders and this can be done through the due diligence process and procedures. The scope and extent of the due diligence required will vary depending upon the circumstances of each proposed transaction.

SURIA KLCC should also monitor significant contractors and suppliers as part of their regular review of the performance of the third party. SURIA KLCC has the right to terminate their services in the event that these third party pay bribes or act in a manner which is inconsistent with the CoBE and ABC Manual.

If any red flags are raised, these issues must be resolved. If it is not possible then the company must be barred from being on the list of registered or licensed contractors / suppliers and/or disqualified from participating in any SURIA KLCC tender exercise.

For further guidance on the implementation of the SURIA KLCC ABC Manual and the due diligence checklist for contractors and suppliers, employees should consult the Integrity & Compliance Department.

8B(iii): Due Diligence Checklist For Contractors, Suppliers and Consultants

The procurement function must follow the following procedures when dealing with Contractors, Suppliers and Consultants:-

- Undertake Credit Reporting Agency search / other risk base assessment (e.g., technical competency and compliance to law) on the third party for purchases or contracts;
- Preparing and maintaining appropriate written documentation of the Credit Reporting Agency search performed.

8C: MERGERS, ACQUISITIONS & INVESTMENTS

SURIA KLCC must undertake due diligence in evaluating Mergers and Acquisition transactions and investments to ensure compliance with anti-bribery and corruption laws.

Transparency International has provided a guide for companies on undertaking anti bribery and corruption due diligence in the course of mergers, acquisitions and investments which is as follows: (<http://www.transparency.org.uk/publications/anti-bribery-due-diligence-transactions>)

8C(i): Due Diligence – Pre Acquisition

- Anti-bribery due diligence is considered on a proportionate basis for all investments but on a risk-based approach, with the level of due diligence being proportionate to the investment and the perceived likelihood of risk of bribery.
- The level of anti-bribery due diligence for the transaction is commensurate with the bribery risks.
- Anti-bribery due diligence starts sufficiently early in the due diligence process to allow for adequate due diligence to be carried out and for the findings to influence the outcome of the negotiations or stimulate further review if necessary.
- The partners or board provide commitment and oversight to the due diligence reviews.
- Information gained during the anti-bribery due diligence is passed on efficiently and effectively to the company's management once the investment has been made.

8C(ii): Due Diligence – Post Acquisition

- To conduct due diligence on a proportionate basis immediately after purchase to determine if there is any current bribery and if so, takes immediate remedial action.
- To ensure that the target has or adopts an adequate anti-bribery and corruption programme equivalent to its own.
- Bribery detected through due diligence is reported to the authorities.

8C(iii): What To Look For In Anti-Bribery Due Diligence

- Has bribery taken place historically?
- Is it possible or likely that bribery is currently taking place?
- If so, how widespread is it likely to be?
- What is the commitment of the board and top management of the target to countering bribery?
- Does the target have in place an adequate anti-bribery programme to prevent bribery?
- What would the likely impact be if bribery, historical or current, were discovered after the transaction had completed?

8D: JOINT VENTURE PARTNERS

In view of the possibility that SURIA KLCC may be held responsible for the illegal activities of its co-venturers, we need to ensure that Joint Ventures in which SURIA KLCC has a controlling interest adopt the SURIA KLCC Anti-Bribery and Corruption Policy and Guidelines (“ABC Manual”).

Where SURIA KLCC neither controls nor operates the Joint Venture (JV) or where SURIA KLCC holds a minority interest, we should:

- make reasonable efforts to influence the JV Partner to adopt the ABC Manual (or substantially equivalent standards and principles) and to comply with all applicable anti-bribery and corruption laws and to establish controls substantially similar to SURIA KLCC standards to prevent bribery;
- be alert to warning signs which may arise in the conduct of the business. Any such warning signs must be reported to the Integrity & Compliance Department and appropriate action to be taken; and
- require (or where this right does not formally exist, request) that the majority partner or JV entity to provide written representation of anti-bribery compliance on an annual basis.

PART 9: RECRUITMENT OF EMPLOYEES

9A: RECRUITMENT OF EMPLOYEES

SURIA KLCC, provides equal opportunity for any qualified and competent individual to be employed by the company from various multicultural and multiracial background, local and internationally.

The recruitment of employees should be based on approved selection criteria to ensure that only the most qualified and suitable individuals are employed. This is crucial to ensure that no element of corruption is involved in the hiring of employees.

In line with this, proper background checks should be conducted for all Board members, management and certain key positions in order to ensure that the potential candidate has not been convicted in any bribery or corruption cases nationally or internationally. More detailed background checks should be taken when hiring employees that would be responsible in management positions, as they would be tasked with decision- making obligations.

If you find or suspect that another person subject to this policy has violated or about to violate this policy or applicable law, whether deliberately or inadvertently, you must forthwith report the same, in writing, to your Head of Department, Integrity & Compliance Department or your Human Resource Department.

Refer to the DO's and DON'Ts below:

DO'S

- ✓ Do ensure that the due process and procedure are carried out based on the approved selection criteria when recruiting new employees. This is to avoid any allegations of bribery and corruption.
- ✓ Do ensure that due diligence is carried out to confirm that the candidate is the suitable person based on eligibility criteria and/or other prerequisites, rules and guidelines.
- ✓ Do ensure that relevant approvals are obtained from the respective approving authority prior to issuance of an Offer Letter.
- ✓ Do ensure that if the candidate to be employed has a family/household relationship to a SURIA KLCC employee or director, it is properly recorded and is being made transparent.
- ✓ Do ensure that all rights, entitlements and benefits given to the candidate are reasonable in value.
- ✓ Do ensure that any 'red flag' is resolved before recruiting. For example, if the candidate is a relative of a government official, you must ensure that it is not against the laws of the relevant country.
- ✓ Do ensure that all documentations (including invoices and receipts) are properly recorded and kept.

DON'Ts

- ✗ Do not recruit an employee without undergoing the proper process and procedures set by SURIA KLCC to ensure that there is no perception of bribery or corruption.
- ✗ Do not try to circumvent any guidelines, rules or procedures when selecting new employees as it might put you and SURIA KLCC in trouble in the event of any bribery allegation.
- ✗ Do not try to conceal any information where you think that there might be a conflict of interest. If you are unsure, please consult approving authority, Integrity & Compliance or HR.
- ✗ Do not arbitrarily award rights, entitlements and benefits. The value and types of rights, entitlements and benefits must be based on the guidelines prepared by SURIA KLCC.
- ✗ Do not fail to give particular attention to any laws, guidelines or policies when a public official is involved. Always consult your approving authority, Integrity & Compliance or HR.
- ✗ Do not conceal, alter, destroy or otherwise modify any documentation.

PART 10: SURIA KLCC WHISTLEBLOWING POLICY

10A: SURIA KLCC WHISTLEBLOWING POLICY

SURIA KLCC encourages openness and transparency in its commitment to the highest standard of integrity and accountability.

If you make a report or disclosure about any actual or perceived bribery or corruption in good faith, belief, without malicious intent, that a breach or violation as aforesaid may have occurred or may about to occur, you will be accorded protection of confidentiality, to the extent reasonably practicable, notwithstanding that, after investigation, it is shown that you were mistaken. In addition, employees who whistleblow internally will be also be protected against detrimental action for having made the disclosure, to the extent reasonably practicable.

Further details of the SURIA KLCC Whistleblowing Policy can be found at www.suriaklcc.com.my, www.alamanda.com.my and www.mesramall.com.my

10B: PROCEDURAL MATTERS

10B(i): CONSEQUENCES OF A BREACH

Adherence to this Policy and Guidelines is critical to the smooth running of its business or enterprise and is for the common good of SURIA KLCC and its employees.

Any conduct which is not in accordance with the principles set out in this Policy and Guidelines will be dealt according to Part IV of the CoBE and other applicable local laws.

10B(ii): HOW TO MAKE A REPORT ON ANY BREACH

Any alleged or suspected known improper conduct must be disclosed using the SURIA KLCC Whistleblowing reporting channels provided as follows:

- i. Email to whistleblowing@suriaklcc.com.my;
- ii. Online submission through website;
- iii. In person to respective Head of Department, Head of Human Resource or Head of Integrity and Compliance;
- iv. In writing to Suria KLCC Sdn. Bhd. Head of Integrity & Compliance Department, Level 13 Menara Darussalam, 12, Jalan Pinang, 50450, Kuala Lumpur;

A copy of the SURIA KLCC Whistleblowing Policy and Procedures is available from your Integrity & Compliance and Human Resource Department. Detailed procedures on whistleblowing can be obtained at www.suriaklcc.com.my, www.alamanda.com.my and www.mesramall.com.my.

10B(iii): FURTHER CLARIFICATIONS

Should you require further clarification with regards to this Policy and Guidelines, depending on the subject concerned, you should consult Integrity & Compliance Department or Human Resource Department.

If you require additional information or clarification, please email your queries to integrity@suriaklcc.com.my

As set forth in the Whistleblowing Policy and Procedures, it is designed to facilitate SURIA KLCC employees, directors, business associates and members of the public to disclose any suspected or known improper conduct within SURIA KLCC through the internal channels listed.

This Whistleblowing policy will not supersede: -

- a) Grievances policies and procedures; and**
- b) Sexual Harassment Policy;**

in the SURIA KLCC Employee Handbook.

10B(iv): REGISTERING ANY CONFLICTS OF INTERESTS, GIFTS AND CORPORATE HOSPITALITY

All conflicts of interests (potential or real) and matters related to giving or receiving gifts/entertainment / corporate hospitality will be registered according to the policies and procedures of this document. Please liaise with your Integrity & Compliance personnel for further information.

SURIA KLCC reserves the right to amend this policy and guidelines.

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