

**PAVILION**

**REAL ESTATE INVESTMENT TRUST**

*Managed by  
Pavilion REIT Management Sdn Bhd*

**ANTI-BRIBERY AND  
CORRUPTION POLICY  
OF  
PAVILION REIT  
MANAGEMENT SDN BHD**

Effective Date: 17 July 2024

## **1. INTRODUCTION**

This Anti-Bribery and Corruption Policy (“ABC Policy”) of Pavilion REIT Management Sdn Bhd (“PRMSB”) sets out the policy statements and other relevant parameters approved by its Board of Directors (“Board”) against bribery and corrupt practices by the directors (“Directors”) and employees (“Employees”) of PRMSB. This ABC Policy also extends to tenants, business partners, external parties, trustees, agents, advisors, vendors, suppliers, contractors, consultants, representatives and staff of Kuala Lumpur Pavilion Sdn Bhd that performs services for or on behalf of Pavilion REIT (“Business Associates”).

PRMSB is the Manager of Pavilion Real Estate Investment Trust (“Pavilion REIT”).

## **2. POLICY STATEMENT**

All Directors, Employees and Business Associates are strictly prohibited from being involved in any form of bribery or corruption.

An offence is committed when any person by himself, or by or in conjunction with any other person:-

(a) corruptly solicits or receives or agrees to receive for himself or for any other person;  
or

(b) corruptly gives, agrees to give, promises or offers to any person whether for the benefit of that person or of another person,

any gratification as an inducement to or a reward for, or with the intent to secure or otherwise on account of :-

(A) any person doing or forbearing to do anything in respect of any matter or transaction, actual or proposed or likely to take place; or

(B) any officer of a public body doing or forbearing to do anything in respect of any matter or transaction, actual or proposed or likely to take place, in which the public body is concerned, or

(C) any business or advantage for Pavilion REIT.

Any person found in violation of any of this ABC Policy and/or being involved in such acts of bribery and/or corruption, shall, if found guilty, be subject to the appropriate disciplinary actions, including termination of services or employment.

Please refer the Malaysian Anti-Corruption Commission (“MACC”) Act 2009 for the definition of ‘gratification’.

### **3. OBJECTIVE**

The objective of this ABC Policy is to set out clear policies of the Board in upholding the highest standards of ethical practices and integrity by all Directors and Employees in carrying out the affairs and businesses of Pavilion REIT and by all Business Associates in performing services for and on behalf of the Pavilion REIT.

### **4. APPLICABILITY**

This ABC Policy applies to all Directors and Employees. The general principles & prohibition under this ABC Policy shall also apply to all Business Associates when transacting with or for and on behalf of Pavilion REIT.

### **5. GUIDANCE ON COMMON FORMS OF BRIBERY AND CORRUPTION**

#### **5.1. Commissions and Incentives**

The giving of commissions and/or incentives in the ordinary course of business is generally not prohibited, so long as they are genuine and commercially driven, with no intent to disguise any acts of bribery or corruption as such.

However, the receipt of commissions and incentive payments by a Director, Employee and/or Business Associates in their personal capacity from third party is strictly not allowed.

#### **5.2. Kickbacks**

Kickbacks are payments made in return for a business favour or advantage. The giving or receipt of Kickbacks is strictly prohibited.

#### **5.3. Facilitation Payments**

Facilitation payments (also known as “grease payments”) are unofficial payments of fees made for certain government services to secure or expedite the performance of a routine action by a public body (as defined in Section 3 of the MACC Act 2009) are strictly prohibited.

**5.4. Gifts, Entertainment and Hospitality**

The receipt or giving of reasonable gifts and entertainment by Directors, Employees and Business Associates are generally not prohibited, so long as they are bona fide, appropriate and reasonable. It should not in any event, be too lavish and intended to influence the decisions of the persons involved.

**5.5. Political Contributions and Donations**

Any contribution to individual politicians or candidates of the political parties is prohibited, unless it is for or in relation with bona fide charitable purposes. Subject to any prevailing laws governing political donations, PRMSB or Pavilion REIT may make contributions to political parties in Malaysia, provided prior approval from the Audit Committee is obtained.

**5.6. Donations and Charitable Support**

Genuine and legitimate donations and charitable support are acceptable, provided they are done in a transparent manner and not used to facilitate corruption, illegal and money laundering activities.

**6. BUSINESS ASSOCIATES**

All Business Associates must be made aware of this ABC Policy. Whenever commercially possible, Business Associates must be required to and must declare their awareness of and undertake to comply with this ABC Policy.

**7. RISK ASSESSMENT**

A Bribery and Corruption Risk Assessment, to be conducted at least once every 2 years, measures the vulnerability to bribery and corruption risks is essential for bribery and corruption prevention and control.

**8. RECORD-KEEPING**

Proper and complete records of business activities of the Pavilion REIT (including payments for gifts, entertainment, donations and charitable contributions) should be kept and maintained for a reasonable period of time, subject to prevailing laws and regulations on record keeping.

**9. WHISTLEBLOWING FRAMEWORK**

A robust framework for whistle blowing and reporting any form of improper conduct, wrongdoings, bribery, corruption, fraud and/or abuse by any Director or Employee as well as any Business Associates is available to allow such acts to be reported via the appropriate channels, whilst protecting the identity of the person reporting, in order to deter, prevent and uncover such acts.

**10. COMMUNICATION AND TRAINING**

PRMSB or its appointed personnel shall conduct adequate awareness programs, trainings, refresher courses for all relevant personnel on a regular basis to ensure they continue to have clear understanding and awareness of the compliance risks and will continuously carry out their duties with a high level of integrity and ethical standards.

**11. REVIEW OF THIS POLICY**

This ABC Policy shall be reviewed at least once every 3 years.