



Paradigm REIT Management Sdn Bhd

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

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DEFINITION

Board	Board of Directors of Paradigm REIT Management Sdn Bhd
CEO	Chief Executive Officer
DAL	Discretionary Authority Limits approved by the Board
DIFA	Director of Investment, Finance and Accounts
HOFA	Head of Finance and Accounts
HOL	Head of Leasing
HOM	Head of Marketing
HOFM	Head of Facilities Management
HOCRS	Head of Compliance, Risk and Sustainability
Key Management	Consists of the CEO, DIFA, RD, HOFA, HOL, HOM, HOFM and HOCRS
Manager	Paradigm REIT Management Sdn Bhd
Paradigm REIT	A diversified REIT established in Malaysia and constituted by a deed of trust
RD	Retail Director
Service Provider(s)	External party(ies) with whom the Manager has, or plans to establish, some business relationship. This may include outsourcing providers, contractors, consultants, suppliers, vendors, advisors, agents, distributors and representatives.
Subject Properties	Collectively – Bukit Tinggi Shopping Centre, Paradigm Mall Petaling Jaya and Paradigm Mall Johor Bahru

1. INTRODUCTION

This Anti-Bribery and Anti-Corruption Policy (“ABAC Policy” or “Policy”) of Paradigm REIT sets out the policy statements and other relevant parameters approved by the Board against bribery and corrupt practices by the Board members, employees and Service Providers.

2. POLICY STATEMENT

All Board members, employees and Service Providers are strictly prohibited from being involved in any form of bribery or corrupt acts, including where that person by himself, or jointly 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:

- (i) any person doing or forbearing to do anything in respect of any matter or transaction, actual or proposed or likely to take place; or
- (ii) 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
- (iii) any business or advantage for Paradigm REIT.

Any person found in violation of any of this 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 to the Malaysian Anti-Corruption Commission (“MACC”) Act 2009 for the definition of ‘gratification’.

3. OBJECTIVE

The objective of this Policy is to set out clear policies of the Board in upholding the highest standards of ethical practices and integrity by all Board members and employees of the Manager in carrying out the affairs and businesses of Paradigm REIT and by all Service Providers in performing services for and on behalf of the Paradigm REIT.

4. APPLICABILITY

The scope of anti-bribery and anti-corruption internal controls applies to all Board members, employees, Service Providers, investors and any third party that has a business relationship with Paradigm REIT and the Manager. The anti-bribery and anti-corruption controls are targeted at identifying and raising red flags on fraudulent financial reporting, management override of procedures, custody of assets, complex transactions and other warning signals. Examples of anti-fraud internal controls that should be in place are surprise audits, job rotation, whistle blowing and background checks on employees.

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5. GUIDANCE ON COMMON FORMS OF BRIBERY AND CORRUPTION

a) 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.

b) Unofficial Payments

Any unofficial payments such as facilitation fees made 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.

c) Gifts and Entertainment

The receipt or giving of reasonable gifts and entertainment by Board members and employees are generally not prohibited, so long as they are not done with corrupt intent, are reasonable, bona fide and commensurate with their positions and should not in any event, be too lavish or expensive. Gifts costing more than RM1,000 must be declared according to the provisions of Paradigm REIT's "Anti-Bribery and Anti-Corruption Standard Operating Procedures".

d) 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, Paradigm REIT may make contributions to political parties in Malaysia, provided that the prior approval from the Board is obtained. The authority limits for any political contributions and donations are stipulated in the DAL.

e) Donations and Charitable Support

Genuine and legitimate donations and charitable support are acceptable, whether in cash or otherwise. Any proposed donations shall require CEO's prior approval in writing and approved according to the limits of the DAL.

6. SERVICE PROVIDERS

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

7. RECORD-KEEPING

Proper and complete records of business activities of Paradigm REIT (including payments for gifts, entertainment, donations and charitable contributions) should be kept and maintained for a period of seven (7) years, subject to prevailing laws and regulations on record keeping.

8. ANTI-BRIBERY COMPLIANCE MANAGEMENT SYSTEM

An effective anti-bribery compliance management system shall be established within the Manager in line with the objective of this Policy.

9. WHISTLEBLOWING POLICY

A policy for whistleblowing and reporting any form of improper conduct, wrongdoings, bribery, corruption, fraud and/or abuse by any Board member or employee as well as any Service Provider have been approved by the Board and put in place 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.

Please refer to Paradigm REIT's "Whistleblowing Policy".

10. COMMUNICATION AND TRAINING

The Manager 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. The training shall include potential disciplinary or corrective actions that may be taken against the employee.

11. CIRCULATION AND REVIEW

This Policy will be:

- a) Circulated to all existing and new employees;
- b) Updated as and when required and in any event at least once every three (3) years; and
- c) Any revisions or amendments to this Policy will be submitted for approval by the Board and communicated to all employees. The revised Policy will supersede the previous version.

(end of Policy)