

SUPPLIER CODE OF CONDUCT



Axis Real Estate Investment Trust ("Axis-REIT") is committed to upholding the highest levels of corporate governance, standards and practices. As such, we require our suppliers, vendors, contractors, service providers, agents and consultants including their employees, subsidiaries, affiliates and sub-contractors (collectively referred to as "Suppliers") to maintain quality standards, health and safety practices, good ethics and fair labour practices as well as to support basic human rights when doing business with us.

Suppliers of products and services to Axis-REIT are required to comply with this Code as follows:

1) **Quality standards**

Suppliers must supply products and services that are certified, safe, fit for purpose, of good quality and comply with applicable laws and regulations in Malaysia.

2) **Ethics**

Business Integrity

Suppliers are expected not to practice or tolerate any form of corruption, extortion or embezzlement. Suppliers must not offer employees/representatives of Axis-REIT's Management Company and/or Property Manager (managing Axis-REIT and/or its properties) gifts or any other kind of personal benefit that could, in any way, influence, or appear to influence their decision in the performance of their duties.

Suppliers are expected to have read, understood and complied with the policies as set out in the Anti-Bribery and Anti-Corruption Policy which is available on the corporate website at www.axis-reit.com.my, in all business dealings with Axis-REIT.

Privacy & Intellectual Property

Suppliers are expected to use confidential information appropriately to ensure that the privacy and intellectual property rights of the organization, employees, partners, investors and tenants are safeguarded and not misused.

3) **Labour standards**

Suppliers are expected to uphold the rights of their employees and workers and to treat them fairly and in accordance with the prevailing laws of Malaysia. This includes granting safe, healthy and respectful workplace environment, fair compensation, benefits and opportunities as well as employment equality. Suppliers must not condone discrimination in any form whether by race, gender, nationality, religion, age or disability.

4) **Human Rights**

All Suppliers must avoid all form of unethical conduct and practices and shall endeavour to:

- Provide a workplace free from physical, psychological or verbal abuse, threats of abuse, sexual, violence or other harassments.
- Comply with prevailing laws by not employing children and prohibit against the use of all form of forced labour, slavery and human trafficking.
- Respect and protect the basic human rights of the vulnerable and marginalised groups and persons and those with different abilities.

5) Health, Safety & Environment (HSE)

Axis-REIT's commitment lies in '**Safety Starts With Us**' and excellence in HSE matters. As such, Suppliers have to comply with Axis-REIT's HSE Policy and procedures at all times when performing their duties under their engagement. The HSE Policy which is displayed at the offices of the Management Company and the Property Manager shall be taken as read and understood by the Suppliers upon entering these premises. The HSE Policy is also published on the corporate website at www.axis-reit.com.my.

6) Environmental Impact

Suppliers shall be sensitive to the impact of their businesses on the environment (including but not limited to air emissions, water discharge, toxic substances and hazardous waste disposal) and the local communities. Suppliers shall comply with the environmental laws and standards within the facilities of their businesses. Suppliers must use care in handling hazardous materials or operating process or equipment that use hazardous materials to prevent unplanned releases into the workplace or the environment.

Refer: The Environmental Policy is available on the website at www.axis-reit.com.my.

7) Compliance with Applicable Laws, Rules and Regulations

All Suppliers are expected to be aware of the relevant laws and regulations applicable to the business environment in which they operate and ensure adherence of the same in their business operations and practices.

8) Personal Data Protection Act (PDPA)

In carrying out the Supplier's obligations under the agreement, the Supplier agrees to comply with all applicable laws including personal data laws. The Supplier shall keep the Management Company and/or the Property Manager of Axis-REIT fully indemnified against all expenses, losses, damage or liabilities which may be suffered by any of them and/or Axis-REIT resulting from or attributable to the Supplier's breach of personal data laws. The Supplier confirms that it has read and understood the privacy notice which is available on the website at www.axis-reit.com.my.

9) Auditing and Inspection

Suppliers shall allow us to access to relevant documents necessary to demonstrate compliance with this Code, and facilities and sites to conduct audits in line with this Code.

10) Reporting of Non-Compliance

Suppliers are allowed to report any unlawful or unethical business practices or non-compliance with any of the areas stated above, which may have come to their knowledge, if any, via the whistle-blowing channel established by Axis-REIT.

Refer: The Whistle-Blowing Policy is available on the website at www.axis-reit.com.my.

Note: "Us" or "Our" or "We" in this Code refers to Axis-REIT, its Management Company and Property Manager and their representatives, interchangeably.