


	KIP REIT	
Issue Date: 01 December 2023	EMPLOYEE CODE OF CONDUCT POLICY	Revision No.: 00 Page 2 of 11

TABLE OF CONTENTS

AMENDMENT LOG.....3

DEFINITIONS4

INTRODUCTION.....5

PURPOSE5

SECTION I – RESPONSIBILITY, ACCOUNTABILITY & COMPLIANCE WITH THE CODE.....6

 1.1 Employees.....6

 1.2 Managers.....6

SECTION II – EMPLOYEE CONDUCT.....6

 2.1 Workplace Environment6

 2.2 Employment.....7

 2.3 Working Attitude7

SECTION III – CODE OF ETHICS.....8

 3.1 Commitment.....8

 3.2 Avoid Conflicts of Interest.....9

 3.3 Gifts and Business Courtesies.....9

 3.4 Anti-Bribery.....9

 3.5 Money Laundering..... 10

 3.6 Confidential Information..... 10

 3.7 Law Compliance Obligations..... 10

 3.8 Protection of Assets..... 10


SECTION IV – VIOLATION AND CONSEQUENCES 11

 4.1 Reporting Violations 11

 4.2 Consequences of Non-Compliance with the code..... 11

SECTION V – REVIEW 11


 5.1 Review of the Code..... 11

	KIP REIT	
Issue Date: 01 December 2023	EMPLOYEE CODE OF CONDUCT POLICY	Revision No.: 00 Page 4 of 11

DEFINITIONS

The definitions contained in this policy are applicable to the singular as well as the plural forms of such terms and to the masculine as well as to the feminine and neuter genders of such term.

TERMS	DEFINITIONS
BOD	Board of Directors of REIT Manager
CEO	Chief Executive Officer
CFO	Chief Financial Officer
C-Suite	CEO and CFO
Company	KIP REIT Management Sdn Bhd
Employee	Permanent and /or Fixed Term Contract of REIT Manager or Service Provider
He / His / Him	Both male and female gender
HR	Human Resource
HOD	Head of Department
Managers	the personnel holding the managerial role of managers in the Company
REIT Manager	KIP REIT Management Sdn. Bhd.
Service Provider	KIP Property Services Sdn. Bhd. or such other service provider as may be appointed or substituted by the Company from time to time

	KIP REIT	
Issue Date: 01 December 2023	EMPLOYEE CODE OF CONDUCT POLICY	Revision No.: 00
		Page 5 of 11

INTRODUCTION

KIP REIT Management Sdn Bhd (“Company”) has adopted this Employee Code of Conduct (“Code”) to reflect the underlying core ethical values and commitment to lay standards of integrity, transparency, fairness, responsibility, excellence, commitment, dedication, diligence and professionalism contributing towards the social and environmental growth of the surroundings in which the Company operates.


The Company’s professionalism, honesty and integrity must be upheld at all times in the Company’s business dealings with :

- a. customers;
- b. vendors;
- c. suppliers and contractors;
- d. government and regulators;
- e. investors;
- f. the business community as a whole; and
- g. its relationship with its own Employee(s).

PURPOSE

This Code is formulated to enhance the standards of corporate governance and corporate behaviour with the intention of achieving the following objectives:

- To encourage high standards of honesty, integrity, ethical and law-abiding behaviour expected of Employees;
- To ensure that the Company’s business interaction should not in any circumstances, be tainted by any malpractices; and
- To provide guidelines on the manner in which employees should conduct themselves at workplace, while performing their daily work duties.

	KIP REIT	 KIP REIT™
Issue Date: 01 December 2023	EMPLOYEE CODE OF CONDUCT POLICY	Revision No.: 00 Page 6 of 11

SECTION I – RESPONSIBILITY, ACCOUNTABILITY & COMPLIANCE WITH THE CODE

1.1 Employees

All Employees are to comply with this Code. It is the Employee’s responsibility to support the implementation of this Code and to report any violations of this Code to Head of HR, HOD or Managers.

Non-compliance with this Code may result in disciplinary action, and if warranted, legal proceedings may be brought against the employee. Violation of applicable laws may also subject employee to civil and/or criminal penalties imposed by a governmental agency or a court, in addition to disciplinary action where justifiable.


1.2 Heads of Department (HOD)/Managers

HOD and Managers have added responsibility to set a good example and to lead the employees under their supervision in the application of the Code in their daily business conduct. They are also responsible for promoting an open and honest two-way communication to facilitate discussion in the event that the application of this Code is unclear.

SECTION II – EMPLOYEE CONDUCT

2.1 Workplace Environment

- a. Employees shall strive to maintain healthy, safe and productive work environment by adhering to the highest standard of professional conduct. They should in all respect and at all times, conduct themselves with honesty, propriety and must not in any circumstances, commit any act that would bring damage to the Company, its property, reputation, or general interest.
- b. Employees are expected to have respect and tolerance for culture and religion and maintain a work environment that is free from discrimination or harassment based on gender, race, political opinion, national origin, marital status (including pregnancy), age, disability, disease, or other factors that are unrelated to the Company’s legitimate business interests.

	KIP REIT	 KIP REIT™
Issue Date: 01 December 2023	EMPLOYEE CODE OF CONDUCT POLICY	Revision No.: 00 Page 7 of 11


- c. Employees shall avoid any conduct in the workplace that creates, encourages, or permits any offensive, intimidating or inappropriate work environment including, but not limited to:
 - i. Threats or comments that contain discriminatory or harassment elements;
 - ii. Unwelcome sexual advances;
 - iii. Violent behaviour or actions;
 - iv. Misuse or abusive of positions of authority; and
 - v. Inappropriate work attire.

2.2 Employment

- a. Employees employed in the Company shall meet the legal working age required under Malaysian employment law. The Company will not condone child labour.
- b. The Company strictly prohibits any form of forced or involuntary labour and ascertains that all employees were engaged in employment through their own volition.

2.3 Working Attitude

- a. Employees shall be fully committed during the course of employment to the Company and at all material times act in the best interest of the Company.
- b. Employees shall obey the Company's legitimate orders and instructions.
- c. Employees shall not engage in any business, trade or occupation which howsoever conflict with the business of the Company or its interest or that may be contrary to the best interest of the Company without prior permission of the Company. Employees are required to disclose to the management any situation that may be or appear to be, a conflict of interest. Employees involved in such activities may be liable to disciplinary action which may include but not limited to dismissal.
- d. Employees shall be punctual for work in compliance with the HR policies.
- e. Employees should adopt values of teamwork with his colleagues and work towards the Company's collective goals.
- f. Employees shall be responsible towards their work, deliverables and deadlines.
- g. Employees are required to be attired properly and appropriately in the Company's premises and/or during office hours.


	KIP REIT	 KIP REIT™
Issue Date: 01 December 2023	EMPLOYEE CODE OF CONDUCT POLICY	Revision No.: 00 Page 8 of 11

- h. Employees shall not at any time during their employment or after their employment disclose to any person of any confidential information related to the Company without prior approval of the Company. For the purpose of this Code, confidential information shall mean the Company's confidential information, whether in written, visual or oral form, whether eye readable or machine readable, whether on paper or electronic form or in any other forms, whether tangible or not and regardless of whether such information is physically labelled or orally notified as confidential (which expression shall include copies, extracts or reproductions in whole or in part), including but not limited to the business, marketing strategies, ideas, concept, financial condition, employees, inventions, algorithms, decision technology and/or models, processes, designs, specifications, drawings, samples, software codes, security procedures and approaches, know-how, customers' names and information, trade secrets and operations.
- i. Employees shall not duplicate or remove or delete Company's confidential information from the Company's server, Company's premises or Company's assets .
- j. Employees shall adhere to all the Standard Operating Procedures ("SOP"), Standard Operating Manuals, and other such internal policies and procedures as may be issued by the Company.

SECTION III – CODE OF ETHICS

3.1 Commitment

- a. All Employees shall, in the course of their employment with the Company and in carrying out their duties and responsibilities in respect thereof, diligently and to the best of their ability perform such responsibilities and responsibilities as may from time to time be assigned or designated to them.
- b. All Employees are expected at all times to promote and advance the interests of the Company and shall not do anything to bring disrepute to the Company.
- c. All Employees shall obey, comply with, and observe rules, regulations, procedures practices, orders, directives and policies of the Company, whether expressed or implied in law or by custom and practice.

	KIP REIT	 KIP REIT™
Issue Date: 01 December 2023	EMPLOYEE CODE OF CONDUCT POLICY	Revision No.: 00 Page 9 of 11

3.2 Avoid Conflict of Interest

Employees are expected to avoid and disclose any activity or association that creates or appears to create a conflict between the personal interests and the Company's business interests. A conflict of interest exists where the interests or benefits of one person or entity conflict with the interests or benefits of the Company.

Employees shall avoid any situation in which the employee has an interest in any entity or matter that may influence the Employee's judgment in the discharge of his responsibilities. Relationships with prospective or existing suppliers, contractors, customers, competitors or regulators must not affect the independent and impartial judgment on behalf of the Company. In addition, Employees must not use their positions or knowledge gained directly or indirectly in the course of their duties or employment for private or personal advantage (directly or indirectly).


When in doubt, it is best to disclose to the management of any situation that may be or appear to be, a conflict of interest.

3.3 Gifts and Business Courtesies

The distinction between bribery and receiving gifts or offering can be difficult to draw hence due care must therefore be exercised. Employees should refrain from receiving and offering gifts (including cash or cash equivalents) to or from any firms or individuals doing or seeking to do business with the Company. The Employees shall not accept gifts or favours if there is reason to believe that its purpose is to improperly influence business decisions.

3.4 Anti-Bribery

All Employees are prohibited to or prohibited to attempt to offer, give, ask for, accept or receive any form of bribe. A bribe occurs when someone attempts to influence a decision by offering some form of undue or improper advantage, incentive or favour.

	KIP REIT	
Issue Date: 01 December 2023	EMPLOYEE CODE OF CONDUCT POLICY	Revision No.: 00
		Page 10 of 11

3.5 Money Laundering

Money laundering in this context means to convert proceeds from criminal activities into assets which appear to be derived from legitimate sources. The Company shall only conduct business with partners involved in legitimate business activities with funds derive from legitimate sources. Employees, particularly those in roles that are related to handling transactions, shall take reasonable steps to prevent and report any suspicious activities or any illegal form of payments.

3.6 Confidential Information


Any information concerning the Company’s business, its customers, suppliers, etc. to which the Employees have access or which is possessed by the Employees, must be considered privileged and confidential, and should be kept strictly confidential at all times. Employees shall uphold the strict confidentiality of all meetings, deliberations and communications of the Management. Unless otherwise authorised by the Management or required by law or regulatory body, Employees must not disclose to any third party any information or make any forward-looking statements which are price sensitive in nature.

3.7 Legal Compliance Obligations

It is the general obligation of the Employees to conduct business and operations of the Company in accordance with the laws, rules, regulations, agreements, guidelines, standards

3.8 Protection of Assets

All Employees are expected to exercise business judgment in a manner that protects the assets of the Company and promote their efficient use. All assets of the Company are to be used for legitimate business purposes. Any suspected incident of fraud, mismanagement of the assets of the Company or theft should be immediately reported to HR for investigation.

	KIP REIT	
Issue Date: 01 December 2023	EMPLOYEE CODE OF CONDUCT POLICY	Revision No.: 00
		Page 11 of 11

SECTION IV – VIOLATIONS AND CONSEQUENCES

4.1 Reporting Violations

Employees should promptly communicate any suspected violations of the Code, including any violations of laws, rules and regulations, to Head of HR, HOD or Managers. Suspected violations shall be investigated by persons designated by the Management. Appropriate action shall be taken on the merit of each case.

4.2 Consequences of Non-Compliance with the code

In case of breach of the Code by the Employees, the Management shall take the necessary action in respect of the non-compliance acts done by Employees.

SECTION V – REVIEW

5.1 Review of the Code

This Code shall be reviewed from time to time to ensure that it is in line with any changes in law, best practices are incorporated and changes in the Company’s vision, philosophy and business plan. Employees shall be informed of any amendments made to the Code.