



REAL ESTATE INVESTMENT TRUST

**AXIS REIT MANAGERS BERHAD (649450-W)**

**the Management Company of  
AXIS REAL ESTATE INVESTMENT TRUST**

# **SUPPLIER CODE OF CONDUCT**

## SUPPLIER CODE OF CONDUCT

This Company, as the management company (“Manager”) of Axis Real Estate Investment Trust (“Axis-REIT”) is committed to maintaining the highest levels of corporate governance, standards and practices. As such, we require our suppliers, service providers, including their employees, subsidiaries, affiliates and sub-contractors (“Suppliers”) to maintain quality standards, health and safety practices, good ethics and fair labour practices when doing business with the Manager and Axis-REIT. These requirements are set out in more detail in this Supplier Code of Conduct (the “Code”).

Suppliers of products and services to the Manager and Axis-REIT are required to comply with the Code.

### 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 the Manager’s employees 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.

#### 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.

#### 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.

### 3) Labour standards

Suppliers are expected to uphold the rights of their employees and to treat them fairly and in accordance with the national laws of Malaysia. This includes granting fair compensation and benefits as well as gender equality. Furthermore, suppliers are expected to avoid practices such as illegal labour, child labour and forced labour which are prohibited in Malaysia.

### 4) Health, Safety & Environment (HSE)

The Manager’s core focus in managing properties comes with the understanding that ‘**Safety Starts With Us**’ and excellence in HSE matters. As such, Suppliers have to comply with the Manager’s HSE Policy and procedures at all times when performing their duties at the Manager’s premises. The Manager’s HSE Policy which is available at the Manager’s office shall be taken as read and understood by the Suppliers upon entering the Manager’s premises.

**5) 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.

**6) 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 Manager fully indemnified against all expenses, losses, damage or liabilities which may be suffered by the Manager resulting from or attributable to the Supplier's breach of personal data laws. The Supplier acknowledges and confirms that it has read and understood the Manager's privacy notice which is available on the Manager's website at [www.axis-reit.com.my](http://www.axis-reit.com.my).