



REAL ESTATE INVESTMENT TRUST

AXIS REIT MANAGERS BERHAD (649450-W)

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

WHISTLE-BLOWING POLICY

**APPROVED BY THE BOARD OF DIRECTORS ON 28 DECEMBER 2012
UPDATED ON 24 OCTOBER 2016**

Objective of this Policy

All stakeholders such as Directors, employees, suppliers or tenants are encouraged to raise genuine concerns about possible improprieties in matters of financial reporting, compliance and other misconduct or malpractices at the earliest opportunity, and in an appropriate way.

This policy is designed to:

- Provide a proper channel for whistle-blowing;
- Support the company's values and maintain a high standard of integrity and accountability;
- Ensure stakeholders can raise concerns without fear of reprisals; and
- Provide a clear and confidential process for dealing with concerns.

Improprieties may include:

- Financial irregularities;
- Fraud;
- Corruption, bribery or blackmail;
- Criminal offences;
- Failure to comply with legal or regulatory obligations or regulatory compliance requirements;
- Miscarriage of justice;
- Endangerment of an individual's health and safety;
- Concealment of information; and
- a combination of the above.

Principles

The principles underpinning this policy are as follows:

- All concerns raised will be treated fairly and properly;
- The company will not tolerate harassment or victimisation of anyone raising a genuine concern;
- Any individual making a disclosure will retain anonymity unless the individual agrees otherwise;
- The company will ensure that any individual raising a concern is aware of who is handling the matter and that the investigation procedures will be carried out; and
- The company will ensure that no one will be at risk of suffering some form of reprisal as a result of raising a concern even if the individual has mistakenly suspected the existence of such a concern but acted in good faith. The company however, does not extend this assurance to someone who maliciously raises a matter he/she knows is untrue.

Reporting Procedures

If any employee reasonably believes and in good faith that malpractice exists in the work place, the employee should report the issue immediately to the immediate superior. However, if for any reason the employee is reluctant to do so, then the employee should report the concerns to either the:

- Chief Executive Officer; or
- Chairman of the Board of Directors.

(please refer to the Appendix A for the details)

If these channels have been followed and the employee still have concerns, or if the employee feels the matter is so serious that it cannot be discussed with any of the above, the employee should report to the Senior Independent Non-Executive Director (please refer to Appendix A), being the director to whom concerns may be conveyed.

The employee who has raised concerns internally will be informed of who will be handling the matter and the subsequent course of action to be undertaken under the investigation procedures.

The employee's identity will not be disclosed without prior consent. Where concerns cannot be resolved without revealing the identity of the employee raising the concern (for e.g. if the evidence is required in court), a dialogue will be carried out with the employee concerned on the next best way to proceed with the matter. All valid reports made including decision(s) or action(s) carried out must be documented and where possible, steps are to be implemented to prevent similar incidence(s) occurring.

Other stakeholders, who are non-employee, may raise concerns in relation to the company and/or its management in accordance with the reporting procedures stated above, where applicable. All genuine reports must be documented.

Appendix A (of Whistle-blowing Policy)

Persons to whom stakeholders should raise concerns to are as appended below. Such stakeholders (of genuine concerns with the belief that the information or allegations are substantially true) will have to make their report in writing i.e. vide a sealed letter in accordance with the reporting procedures stated in this policy.

All written letters and sealed are to be marked **STRICTLY CONFIDENTIAL AND TO BE OPENED BY ADDRESSEE ONLY.**

- 1) Chairman of the Board of Directors

YAM Tunku Dato' Seri Shahabuddin Bin Tunku Besar Burhanuddin

Address:

Strateq Data Centre
12 Jalan Bersatu 13/4
Section 13
46200 Petaling Jaya
Selangor Darul Ehsan

- 2) Senior Independent Non-Executive Director

Encik Mohd Sharif Bin Hj Yusof

Address:

5 Jalan 22/38
46300 Petaling Jaya
Selangor Darul Ehsan

- 3) Chief Executive Officer

Ms Leong Kit May

Address:

Penthouse, Menara Axis
No. 2 Jalan 51A/223
46100 Petaling Jaya
Selangor Darul Ehsan

[END]