

# PAVILION

REAL ESTATE INVESTMENT TRUST

*Managed by  
Pavilion REIT Management Sdn Bhd*

## **VENDOR CODE OF CONDUCT**

Effective Date : 17 July 2024

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## **1 Introduction**

In embracing the spirit of the Malaysian Code on Corporate Governance (“MCCG”), Pavilion Real Estate Investment Trust Management Sdn Bhd (“PRMSB”), the Manager for Pavilion Real Estate Investment Trust (“Pavilion REIT”) is committed to adopting the practices as outlined in the MCCG. Amongst others, PRMSB will ensure responsible dealings with vendors by promoting these best practices.

This **Vendor Code of Conduct (the “Code”)** outlines business integrity and ethics, PRMSB’s expectations, vendors’ compliance parameters and their responsibility towards the environment.

PRMSB has taken a proactive approach to managing environmental impact and we call upon our vendors to raise their environmental consciousness.

Vendor refers to any individual or business that supplies goods or services to PRMSB and/or Pavilion REIT, and includes all persons employed by the vendor as well as sub-contractors and service providers engaged by the supplier.

This Code also applies to employees of Kuala Lumpur Pavilion Sdn Bhd (“KLPSB”) who are engaged for management of Pavilion REIT’s properties.

## **2 Compliance with Laws and Regulations**

Vendors must comply with this Code, all the applicable laws and regulations and ensure that their representative(s) understand and adhere to the Code.

## **3 Ethical Dealings**

PRMSB is committed to the highest standard of ethical and professional conduct in our business dealings. Vendors are expected to share similar practices by conducting all procurement and business relationships with integrity, honesty, and transparency and be accountable for the services provided.

## **4 Conflicts of Interest**

Vendors should declare as soon as possible if any of their representative(s) is aware of any potential conflicts of interest. PRMSB prohibits vendors from gaining improper advantage through the service / relationship, as the personal interest (i.e., family members) of the vendor's representative(s) with PRMSB's and / or KLPSB's employee could potentially interfere with their duties and responsibilities.

## **5 Anti-Bribery and Corruption**

PRMSB adopts zero-tolerance approach against all forms of bribery and corruption. Vendors acting for and on behalf of PRMSB and / or Pavilion REIT are expected to share PRMSB's value. Vendors should comply with PRMSB's Anti-Bribery and Corruption Standard Operating Procedure and Policy by acknowledging its "Declaration of Integrity" form (*when relevant*).

Vendors should not solicit and accept any form of bribery and should not offer any PRMSB / KLPSB employee gifts and inducements that may influence a business decision or retain business.

Vendors should report all incidents of bribery and corruption that may come to their attention via <https://bdoethics.com/v1/r/QxgwQn00Eyx5cz2z6DILFLAGx4xDL6x9>.

## **6 Anti-Money Laundering and Counter Financing of Terrorism**

Vendors must abstain from participating in or facilitating transactions that involved funds obtained through unlawful means. Refer to Pavilion REIT's Anti-Money Laundering and Counter Financing of Terrorism Policy for details.

## **7 Health, Safety and Labour Practices**

Pavilion REIT is dedicated to upholding human rights and promoting social inclusivity, equality, and equity. It does not tolerate forced labor, child labor, exploitation, human trafficking, or violations of basic human rights.

PRMSB / Pavilion REIT's vendors shall at all times comply with the relevant provisions of the safety and health laws and regulations which include but not limited to the Occupational Safety and Health (Amendment) Act 2022. The vendors shall take necessary measures to ensure the safety and health of their employees at work, including the employees of the contractors engaged by the vendors.

Vendors must also comply with the applicable labour and employment laws and regulations which include but not limited to the Minimum Wages Order 2022 and the Employment (Amendment) Act 2022. Besides ensuring fair wages and safe working conditions, all immigration laws and regulations shall be strictly adhered to.

## **8 Environmental Sustainability / Environmental Protection**

PRMSB recognises the importance of Environmental, Social, and Governance ("ESG") and commits to promoting the best practices by integrating ESG considerations in its / Pavilion REIT's business strategies. Amongst others, it aims to work with its business partners to enhance ESG practices within their own businesses. Pavilion REIT aims to collaborate with vendors who actively manage their emissions and carbon footprint, reflecting Pavilion REIT's commitment to a fair transition in addressing climate change. It also endeavors to create a net positive environmental impact through initiatives such as the circular economy, renewable energy, and other sustainable practices.

PRMSB supports vendors who adhere to environmental laws and regulations and encourages its vendors to proactively manage environmental impact and operate in a sustainable manner. Responsible environmental practices can include:

- (a) Minimising waste
- (b) Recycling
- (c) Utilising non-toxic chemicals whenever possible
- (d) Sourcing materials ethically and sustainably
- (e) Adopting environmentally friendly technologies
- (f) Practicing responsible water and energy use
- (g) Preventing pollution

For more information on Pavilion REIT's sustainability commitments, please refer to Pavilion REIT's Sustainability Policy.

## **9 Confidentiality**

Vendors must keep confidential all information made available throughout the service with PRMSB and / or Pavilion REIT. This obligation of confidentiality shall survive after the termination or expiration of engagement period.

## **10 Non-Compliance with the Code**

To foster transparency and accountability, Pavilion REIT has a Whistleblowing Policy that provides channels for reporting legitimate concerns, ensuring they are objectively investigated and addressed.

Vendors must ensure their representatives understand and comply with this Code. Vendors should promptly inform PRMSB of any non-compliance and they are expected to remediate any non-compliance to PRMSB's satisfaction.

PRMSB reserves the right to take action that it deems fit against the vendor for any material violation of this Code. Depending on the circumstances and the seriousness of the violation, it may result in termination of contract.

## **11 Review of this Policy**

This Code shall be reviewed at least once every 2 years to ensure it remains relevant and appropriate. Any amendment must be approved by the Board.