



# COBC

CODE OF BUSINESS CONDUCT

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# COBC



CODE OF BUSINESS CONDUCT

# WE BRING IT ALL TOGETHER IN HARMONY TO DRIVE OUR GOALS



## PURPOSE

To be a Value Multiplier for People, Businesses, Economies and the Planet



## VISION

Advancing real estate as a force for collective progress, in harmony with the planet's resources



## MISSION

To develop, own and manage a thriving asset portfolio that creates value for all stakeholders

### VALUES

T

Together we do what's right

E

We lead with Excellence

A

We embrace new Approaches

M

We **M**ake things happen

## A MESSAGE FROM OUR GROUP MANAGING DIRECTOR

Dear #TEAMSimeDarbyProperty,

I am pleased to present the updated Code of Business Conduct ("COBC").

As our business landscape continuously evolves, it is imperative that we maintain the highest standards of ethics, transparency, and accountability to meet the growing expectations of our stakeholders. The updated COBC is our blueprint for achieving this.

I encourage you to make COBC an integral part of your daily work and understand how it aligns with our **TEAM** values: **T**ogether We Do What's Right, We Lead with **E**xcellence, We Embrace New **A**pproaches, and We **M**ake Things Happen.

Let us uphold the highest standards of ethics and conduct in all our dealings, driven by our Purpose to be a Value Multiplier for People, Businesses, Economies, and the Planet. Together, we can drive Sime Darby Property to greater heights, demonstrating that success and integrity can go hand in hand.

On behalf of the Board of Directors, I would like to thank you for your dedication and commitment to our shared values. Let's continue to work together, with pride and integrity, to shape a better future for Sime Darby Property and the communities we serve.

Sincerely,  
Dato' Azmir Merican  
Group Managing Director

• BEHAVIOURAL PRECEPTS FOR PEOPLE MANAGERS •

**T** Together We Do What's Right

**E** We Lead With Excellence

**A** We Embrace New Approaches

**M** We Make Things Happen



ACCEPTABLE



Ensure staff understand and comply to policies, processes and procedures



Empower team to deliver results



Encourage and receptive to test new ideas



Set clear direction and expectations



Create a safe environment for employees to speak up



Instill a sense of urgency and speed in delivery



Identify and introduce innovative solutions – be a differentiator



Make timely decisions and be accountable for own decision



Support team when things go wrong



Embrace diversity and inclusivity



Continuously raising the bar



Create a fun and thriving work environment



Acknowledge and give recognition when due



NOT ACCEPTABLE



Being bias and practise favouritism



Slow in decision making causing bottle-necks



Defensive and quick to dismiss new ideas and feedback



Procrastinate



Impose a culture of fear and not allowing employees to have a voice



Tolerate low quality work, products & services



"It's working, why change" behaviour – stuck in status quo



No action, talk-only attitude



Not owning up to mistakes



Not listening to employees



Being too conservative and rigid



Not taking accountability and ownership

• BEHAVIOURAL PRECEPTS FOR EMPLOYEES •

**T** Together We Do What's Right

**E** We Lead With Excellence

**A** We Embrace New Approaches

**M** We Make Things Happen



ACCEPTABLE



Treat everyone respectfully



Be proactive and anticipate customer's needs



Continuously improve and innovate



Take ownership and accountability



Dare to speak the truth



Execute with speed without compromising quality



Learn and embrace new practices



Be disciplined in conserving energy and water usage



Say no to gifts, bribes, corruption



Enforce safety standards to strive for zero fatality



Understand industry trends and competition



Collaborate with others to complete task or resolve issues



NOT ACCEPTABLE



Behave or act in an unethical manner



Work in silo



Make excuses and refuse to accept new ways of working



Procrastinate



Hiding and not escalating issues



Producing sub-standard work



Not making effort to participate in company's sustainability initiatives



"Don't care" attitude



Not reporting unsafe acts, incidents or hazards



Complacent and stay in comfort zone



Not sharing crucial information with others



Shifting responsibilities to others

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# 1



## INTRODUCTION

SKILLS

01



READ



EXPLAIN



UNDERSTAND



ACT



COMPLIANCE REQUIREMENTS

LV 1: ROOKIE

1/10

Welcome to Sime Darby Property. Your path to becoming a Sime Darby Property Hero starts now! First, let's learn the basics.



COBC

Seek Guidance



When in doubt, seek guidance.

Report Breaches



Do not be a bystander. Report actual or potential breaches as soon as you are aware of it.

Maintain Confidentiality



Keep information relating to breach or investigation confidential. Respect the privacy of others and do not gossip.

Cooperate In Investigations



Cooperate fully with any inquiry or investigation process. Tell the truth.

# 01

## INTRODUCTION

We believe that the delivery of corporate objectives to our many stakeholders must come hand in hand with good governance, a high standard of integrity and unquestionable ethical conduct in all our business dealings. Good returns to our shareholders, quality products and services for our customers, fair opportunities for our suppliers as well as a good and inclusive working environment for our staff to grow in must not be achieved through dubious, unprofessional or unethical means.

We have encapsulated our beliefs, values and conduct in this Code of Business Conduct ("COBC") which we will use to guide us in our journey in fulfilling our mandate and delivering the results expected of us.

We recognise and acknowledge that the journey will not be easy as challenging situations or ethical dilemmas will present themselves where solutions or guidance are not always easily available or clear. No matter how difficult the journey or decisions will be, we are committed to carrying out our duties professionally with humility and integrity and at all times upholding the values and principles of the COBC.



### 1.1 Responsibility to the COBC

The COBC is one of the core guiding documents for Sime Darby Property Berhad and its Group of Companies ("the Group"). As such we will conduct ourselves in accordance with the principles articulated in this COBC and will:

- Read, understand, declare and maintain compliance with the provisions within the COBC.
- Provide guidance and clarification to those who seek them.
- Attend and/or contribute to COBC trainings and related programmes, where necessary.

### 1.2 Seeking Guidance and Raising Concerns

If we are unsure about the applicability of any aspect of the COBC or any matters raised herein, we will seek clarification from our supervisor.

Further, whilst the Group attempts to provide as much guidance as possible through this COBC, we recognise that the COBC may not be able to address every possible scenario or concern that we may have.

Therefore, when in doubt, we will consult and seek the necessary guidance to address such concerns from:

- Our immediate superior. In most instances, our superior will be the person who can help, guide and address any concerns that we have.
- Group Compliance Office ("GCO"). We can approach GCO if we have any queries or concerns about the interpretation or application of the COBC.
- Any Head of Department or Function or internal subject matter expert who has knowledge of the matter.

### 1.3 Reporting Breaches of the COBC

The ability to deal with breaches of the COBC in a timely manner is as important as ensuring compliance with the COBC. One of the key enablers for the Group to deal with and address actual or perceived breaches is through the cooperation from and reporting of breaches by internal and external stakeholders.

As such, we will promptly report instances of actual or suspected violation of the COBC. We will speak out and will not remain silent when we observe any breaches of the COBC.

We will, in the first instance, escalate actual or perceived breaches to our immediate superior or through the various escalation channels that are made available by the Group as prescribed in the Group's Whistleblowing Policy, which include:

- Head of Department or Function or Business Unit.
- Chief Risk, Integrity and Compliance Officer or Chief Assurance Officer or Chief People Officer or Head, Legal.
- Group Managing Director.

In the event it is inappropriate to escalate the matter to our immediate superiors or if we are not satisfied with the response received from the previously mentioned individuals, we will directly report instances of actual or suspected violation of the COBC to the whistleblowing channels, as listed below:

**Whistleblowing e-Form** available on corporate website and internal portal.

**Emails:**

- Chairman of Audit Committee: [gacchair@simedarbyproperty.com](mailto:gacchair@simedarbyproperty.com)

- GCO Whistleblowing Unit: [whistleblowing@simedarbyproperty.com](mailto:whistleblowing@simedarbyproperty.com)

**Calls and/or Text Messages to:**  
(Malaysian Office Hours; GMT+8 hours)

- Toll Free Numbers**
- Malaysia  
1-800-88-2222
  - United Kingdom  
0808-234-0865
  - Singapore  
800-6011-485

**Telephone Hotline** at  
(+603) 7849 5789

**Mobile Hotline** at  
(+6019) 2488 909

**Letters** to GCO Whistleblowing Unit at:  
Sime Darby Property Berhad  
P.O Box 8077,  
Kelana Jaya 46781  
Selangor, Malaysia

### 1.4 Non-Retaliation and Protection Afforded for Concerns Raised

The Group recognises and understands that as the complainant, we may sometimes be worried about possible repercussions when disclosing and reporting any actual or suspected violations or cooperating in an investigation.

The Group will provide the necessary support when genuine concerns are raised and whereby the complainant reasonably believes the information reported to be true.

Should a concern or complaint be lodged, the Group will:

- Keep the identity of the complainant confidential and protected.

The Group will seek the consent of the complainant if there is a need to reveal his or her identity in the course of the investigation and related matters.

The complainant should understand that any decision to not provide consent or to remain anonymous may have an impact on the outcome of the investigation. Further, there may be instances when the Group is compelled by law to disclose the identity of the complainant.

- Seek to ensure that the complainant shall not suffer from harassment, discrimination, retaliation or any adverse employment consequences (if applicable) regardless of whether the allegation is proven to be true or not.

If the complainant believes that they have suffered any such treatment, the complainant should immediately lodge a report through the secure whistleblowing channels set out in the preceding section.

However, the Group reserves the right to subject the parties responsible to appropriate actions if the allegations are proven to be malicious or otherwise made without reasonable grounds or belief.

### 1.5 Investigating Potential COBC Violations and Disciplinary Actions

We take a serious view of all reports of actual or potential COBC violation and we will investigate them thoroughly in accordance with the relevant investigation and internal procedures.

Where the Group assesses that such violation has been committed:

- We will deal with the violation in accordance with the Group's relevant policies and procedures.
- We will also take appropriate action, including but not limited to:

- Disciplinary action, including termination of employment or dismissal (for Employees).
- Termination of contract by the Group (for Counterparties).
- Reporting to relevant authorities which may lead to prosecution or other action.

We will ensure that all reports received are treated with the strictest confidence whereby disclosure, if required, will be on a limited and need-to-know basis so as to enable a full investigation to be conducted in respect of the alleged violation.

To maintain the confidentiality of allegations received and to minimise the risk of jeopardising the outcome of the investigation, which may include but is not limited to the loss of information or confidentiality of the information providers, we will not discuss or disclose any information that we may have come across during and after the investigation to unauthorised individuals. Any unauthorised disclosure will be viewed as serious misconduct which may result in disciplinary action, up to and including termination of employment or dismissal.

### 1.6 Interpretation of Conflicting Standards and Requirements

The principles and guidance provided in the COBC may, at times, not be aligned with certain Group policies and procedures, or regulatory and legislative provisions.

In the event of a conflict, and unless prohibited by prevailing and applicable regulations or laws, the stricter provision shall apply.



• FREQUENTLY ASKED QUESTIONS •



**Q** I just submitted a whistleblowing report. What happens next?

**A** Your report will be assessed and investigated thoroughly. The results of the investigation, including recommendations, thereafter, will be presented to the Audit Committee for further deliberation.



**Q** What should I do if I suffer retaliation or unfair treatment because of what I have reported?

**A** You can lodge a complaint through whistleblowing channels, speak to the Chief Assurance Officer or the Chief Risk, Integrity and Compliance Officer or write to the Audit Committee Chairman. Appropriate actions will be taken based on the complaint received.



**OUR  
COMMITMENT  
TO OUR WORKPLACE**

SKILLS

02

OUR COMMITMENT TO OUR WORKPLACE

LV 2: AMATEUR

2/10

You're gaining experience and honing your skills.



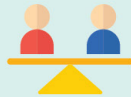
DO



Treat others how you want to be treated.



Respect each other regardless of background and differences.



Treat everyone fairly and give equal opportunities based on their capabilities.



Keep the workplace safe at all times. Obey safety rules and wear protective gear when necessary.

DON'T



Do not abuse your authority or position of power.



Do not harass, abuse or act violently towards one another.



Do not do drugs. Do not get drunk during working hours.



Do not sexually harass anyone in any form. "No means no."

# 02

## OUR COMMITMENT TO OUR WORKPLACE

We are committed to creating a good, conducive and productive work environment for everyone.

### 2.1 Acting Respectfully and Responsibly

We will be respectful in our conduct when dealing with our superiors, peers, subordinates and external stakeholders.

We will be accountable and responsible for our conduct, actions and decisions.

In our interaction with others, we must:

- Show respect to each other.
- Treat each other with dignity.
- Be honest and truthful in our engagement with each other.

We will cultivate a healthy working environment within the workplace as an unhealthy working environment reduces teamwork, productivity and eventually leads to not performing to the expected standards of our stakeholders. We will **not**:

- Spread rumours/gossip.
- Engage in bullying in the workplace.
- Avoid addressing the problem or pass the buck.
- Avoid cooperation with others.
- Create a hostile or over-competitive work environment.

### 2.2 Ensuring Equal Opportunity and Non-Discrimination in Our Actions and Decisions

We are committed to providing an inclusive environment that promotes diversity and will not tolerate any form of discrimination, racism or actual or unconscious bias.

We believe that we are employed based on qualifications, merit, performance and other job-related factors and not based on gender, race, disability, nationality, religion, age or sexual orientation unless such selection is required by or for compliance with specific laws or regulations.

We will be fair and equitable in our conduct and non-discriminatory in our actions and thoughts.

We must:

- Treat everyone fairly and equally without discrimination on the basis of gender, race, disability, nationality, religion, age or sexual orientation.
- Recommend and approve promotion, bonus and increment based on performance and achievement of targets.
- Assign jobs or tasks based on the capability of the person to deliver results without any preferential treatment or favouritism.

### 2.3 Non-Tolerance for Harassment, Abuse and Violence at Work

We seek to provide an environment where all forms of harassment, abuse or violence are not tolerated. If such harassment, abuse or violence were nevertheless to occur, we will address the violation and provide the necessary support for the victims.

To contribute towards an environment that is free from harassment, abuse or violence, we must **not**:

- Engage in any behaviour that is offensive, intimidating, bullying, malicious or insulting.
- Create a hostile and intimidating work environment.
- Isolate or be uncooperative with colleagues.
- Threaten colleagues in the workplace.
- Abuse our authority or position of power.
- Engage directly or indirectly in any behaviour, remarks or gestures that could be construed as sexual or other forms of harassment.
- Share, send or distribute offensive materials or materials of a sexually explicit nature.

## 2.4 Making Our Workplace a Safe Environment

We strive to provide a safe and healthy work environment for all.

We will obtain the necessary training and guidance to ensure we can maintain a safe working environment for ourselves and our colleagues.

Our expectation is that a safe working environment must be maintained at all times, and we will communicate the same to all our business partners, contractors and counterparties. At the minimum, we expect a similar commitment to be shared and practised by our business partners, contractors and counterparties.

While every effort is taken to ensure our safety, we must:

- Be responsible for each other's well-being as well as the safety of the general public.
- Prevent workplace accidents and injuries.

- Utilise protective equipment and devices where required, ensure that all protective gear, machineries and devices are in good working condition, read the required safety manual and guidance, and attend required safety and health training.
- Guide others, including contractors and visitors, on the required health and safety procedures and instructions.
- Undertake work only if we are properly trained, competent and medically fit to do so.
- Ensure that we are sufficiently rested and alert to carry out our duties.
- Understand what needs to be done if an emergency occurs at the workplace.
- Comply with all occupational safety and health legislation in countries where we operate, as well as the Group's own environmental, safety and health management system including policies, procedures, rules and regulations
- Immediately report to the management in the event of:
  - Any accident or injuries (actual or near misses);
  - The presence of unsafe or unhealthy work conditions or hazardous conditions; or
  - Failure of equipment or tools.
- Notify the Head, Safety and Sustainability as well as the Group Managing Director in the event that hazardous materials come into contact with the environment or are incorrectly handled or disposed.

As our safety is paramount to all of us, we must remember **not** to:

- Undertake work or related activity when under the influence of alcohol or drugs or when using medication improperly.
- Continue with work that has become unsafe or unhealthy.

## 2.5 Providing Favourable Working Conditions to All Our Employees

We provide fair and reasonable working conditions for our Employees, which encompass:

- Fair wages and benefits based on the scope of work, including compensation for overtime work.
- Reasonable and flexible working hours, including holidays, and leave entitlements. At the minimum, we will ensure all wages and benefits are in line with the relevant laws and regulations.
- Workspaces and facilities that enable us to work productively.

In return, we will perform our duties with proper care and diligence, serve faithfully, and deliver the outcome expected by our stakeholders. We will not engage in or use office time to conduct personal business that will be in conflict with our duties to the Group. Examples of personal business include selling and/or peddling of personal goods to colleagues or outsiders during business hours.

## 2.6 Allowing Freedom of Association and Involvement in Political Activities

We have the right to join and form organisations of our choice and, through these organisations, to bargain collectively.

We also have the right to participate in the political process. Such participation, and any support and contribution, must be made in our own personal capacity, in our own time and using our own resources. We will ensure that our personal political views are not, in any way, misconstrued as that of the Group's.

If we wish to hold office in a political party, we will seek appropriate approval prior to accepting the offer. However, if we want to play an active role or seek to be elected to a federal or state legislative body, we will resign and cease to be an employee of the Group.

## 2.7 Protecting the Rights of Children

We will safeguard children to ensure that they are protected against harm.

We seek to promote the wellbeing of children, and protect them from any form of maltreatment or exploitation, including child sex tourism, child trafficking, child labour and child pornography. We prohibit the use of child labour in our operations.

When a young worker is employed as part of a short term work scheme or an educational programme, we will ensure that the work is not mentally, physically, socially or morally dangerous, and does not interfere with their education by depriving them of the opportunity to attend school. We will also ensure that they are remunerated fairly for the work performed.

## 2.8 Eradicating Any Form of Exploitation

We do not accept or allow any form of forced labour, bonded labour, slavery, human trafficking or sexual exploitation within our operational areas and within our sphere of influence.

We take a serious view of any allegation of exploitation. We will investigate and take necessary action in accordance with the relevant internal processes and procedures and where necessary, report to the relevant authorities.

• FREQUENTLY ASKED QUESTIONS •

**Q** I want to recruit people who can work as a team. Can I request HR to hire people of the same age group or racial background as my existing staff in the department?

**A** No. Employment should be based on qualifications, merit and other job-related factors and not based on gender, race, age, or nationality.



**Q** There is someone on our team who is not performing well, and we do not want him on our team. As a manager, can I ask the rest of the team to isolate him until he resigns?

**A** As a manager, you should not give such instructions to your team members. You should find out the root cause of why the employee is not performing up to expectations and provide the necessary guidance and support to help the employee improve his performance.

**Q** We have a new team member who is very young and attractive, but she is a timid person. As her colleague, I want her to feel welcomed, so I always compliment her looks and what she is wearing daily. Is this allowed?

**A** Compliments towards a person's appearance should be avoided, as such remarks can be construed as sexual harassments.



**OUR COMMITMENT TO PRESERVE AND PROTECT COMPANY ASSETS AND INFORMATION**

SKILLS

03

OUR COMMITMENT TO PRESERVE AND PROTECT COMPANY ASSETS AND INFORMATION

LV 3: INTERMEDIATE

3/10

You're becoming more proficient in your abilities.



**Company Assets:**

Protect and preserve company assets provided to you. Minimise personal use of the assigned assets.

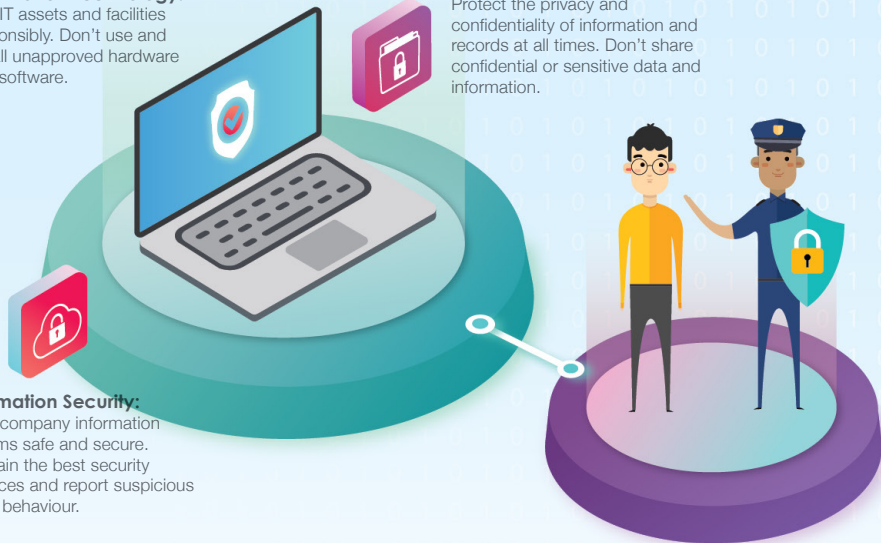


**Information Technology:**

Use IT assets and facilities responsibly. Don't use and install unapproved hardware and software.

**Safeguard Record:**

Protect the privacy and confidentiality of information and records at all times. Don't share confidential or sensitive data and information.



**Information Security:**

Keep company information systems safe and secure. Maintain the best security practices and report suspicious cyber behaviour.



# 03

## OUR COMMITMENT TO PRESERVE AND PROTECT COMPANY ASSETS AND INFORMATION

### 3.1 General Principles in Protecting Group Assets

Group assets are created with the intention to advance and achieve the Group's business goals. Group assets include but are not limited to physical and financial assets, proprietary and confidential information, as well as records and information generated or obtained by the Group as part of its business transactions.

The Group values its assets and resources and will ensure that they are secured, physically protected and their value preserved.

To facilitate the discharge of our duties efficiently and effectively, the Group has granted us the use of its various assets. As such, we should, as far as possible, use those assets for business purposes only and protect them at all times.

Limited personal use is permitted if the usage does not interfere with the Group's business and the usage is in compliance with all applicable policies.

When provided with Group assets for our use, we are expected to:

- Use those assets responsibly, for their intended purpose and in the intended manner.

- Protect them against wastage, loss, damage, abuse, misuse, theft and misappropriation.
- Not remove the physical assets or property from the company premises without permission.
- Not misuse or abuse the asset provided.
- Not use the assets for personal benefit (other than for limited personal use as permitted above) or for the benefit of anyone other than the Group.
- Report any suspected incident of fraud or theft immediately for investigation.

### 3.2 Using Information Technology ("IT") Assets and Facilities Responsibly

When using any IT assets and facilities, such as computers, laptops, internet and email services, as well as all computer hardware, software and peripherals, we are expected to:

- Use these IT assets and facilities responsibly and primarily for business purposes. We may use facilities such as email and internet access for personal needs, as long as the use is reasonable, kept to a minimum and does not have a material impact on the Group.
- Keep passwords and credentials assigned to us confidential. Do not share them.
- Use only Group-approved or provided hardware, software and other IT services (this may include personally owned devices as specifically authorised).
- Maintain the integrity of the computer facilities. Our actions should not put the computer facilities and data contained

therein at the risk of corruption and failure. Actions such as disabling, defeating and circumventing standard security features installed by the Group is not allowed. We will comply with the Group's Information Technology Policy in specific, information security, usage of Computer Facilities and the need for timely reporting to Group IT of any known IT security problem/violation, virus attack and any computer related fraudulent/criminal related activities.

- Keep Group information confidential and do not use public cloud facilities, such as Dropbox, Google Drive, OneDrive, Gmail, Hotmail, etc, for storage and/or transmission of Group's confidential information.

We will **not** use IT facilities to:

- Access, store, send, post or publish materials that are sensitive and illegal.  
These include materials that are pornographic, sexually explicit, indecent or obscene in nature, or that promote violence, hatred, terrorism, intolerance, harassment or any materials or information of which the truthfulness of which has yet to be substantiated.
- Defame, slander or harm the reputation of the Group or any person or entity or their goods or services.
- Access or attempt to access other IT facilities or data without proper authority or expressed permission from the rightful owner.

Where allowed by applicable laws in the countries in which we operate, we acknowledge that the Group reserves the right to monitor our email, instant messaging, blogs, and use of the internet on company-issued computers. Where required, such information can be recovered and used as evidence in a domestic inquiry or a court of law or other proceedings, or be disclosed to the authorities or regulatory bodies.

### 3.3 Keeping Information Confidential

We understand and seriously value information, whether general, personal, proprietary or confidential in nature. Proprietary and confidential information is defined as information that is not generally available or known to the public or the market.

With respect to personal data, we are committed to:

- Protecting the privacy and confidentiality of personal information obtained during the course of our business, including personal information relating to our Directors, Employees, Counterparties, Customers and Business Partners.
- Keeping all personal and sensitive data private and protected unless access to and disclosure of such information is required by law or where consent has been granted for legitimate business purposes.
- Complying with relevant government legislation and regulations governing privacy of personal information, including but not limited to the Personal Data Protection laws applicable in the countries we operate in.

Any unlawful or unauthorised disclosure of proprietary, personal or confidential information or infringement of intellectual property rights can cause permanent loss or damage to the Group and may lead to civil or criminal proceedings against the offending party.

It is our responsibility to safeguard the Group's proprietary and confidential information which includes contracts, strategic business plans, new product launches, mergers and acquisitions, financial data, marketing plans, or information on employees, customers and suppliers, including their personal data as in accordance with the Group's Records Management Policy. We will take all necessary

steps to protect proprietary, personal and confidential information generated or obtained as part of our normal business operations.

Therefore in respect of protecting proprietary, personal and confidential information (collectively known as sensitive data), we also have the responsibility to:

- Understand the nature and classification of the information or data and whether they form part of the sensitive data classification.
- Protect sensitive information at all times, including outside of the workplace and working hours, and even after tenure with the Group.
- Disclosure is only permitted where required by an order of any court of competent jurisdiction or any competent judicial, governmental or regulatory authority.
- Use the sensitive data solely for the purposes of carrying out our duties and for legitimate business purposes or as required by law only.
- Protect sensitive data from theft, misuse, unauthorised disclosure or mishandling. Mishandling includes unauthorised viewing, copying, distribution, removal, damage, destruction or alteration of the information.
- Maintain the confidentiality of sensitive data we come across in dealings with customers, suppliers and third parties.
- Properly dispose of physical and soft copies of sensitive data.
- Obtain the necessary approval before releasing sensitive data to any third party.
- Where required, obtain consent from the data owner before processing the sensitive data.

- Attend the necessary trainings to understand the requirements when processing and handling sensitive data.
- Take the necessary steps to protect documents and IT devices when away from the workplace.
- Comply with applicable laws as well as the Group's policies when dealing with sensitive data.
- Ensure all necessary filing and due diligence have been carried out with respect to patents, designs and trademarks or other intellectual property rights when researching, developing or preparing to launch new brands, sub brands, services, designs, inventions, communication, advertisements and promotional materials.
- Ensure a contract is in place with appropriate clauses to protect the Group's rights, including but not limited to intellectual property rights and ensuring freedom to use results when undertaking collaborative work with third parties.
- Report to the Legal Department any product, packaging, communication or marketing practice that is suspected to have infringed on the Group's copyrights, trademarks, patents, design rights, domain names and/or other intellectual property rights.
- Not communicate or disclose sensitive data in any manner to Competitors, Customers, persons engaged in any aspect of the securities industry, members of trade associations or other third parties unless such communication or disclosure is authorised by the Group.
- Not disclose sensitive data to other Employees, unless we are authorised to do so and only on a need-to-know basis.
- Not use or modify any sensitive data for our own or a third party's interest or benefit.

## FREQUENTLY ASKED QUESTIONS

### 3.4 Maintaining Proper Records

It is everyone's responsibility to ensure that accurate and complete business and financial records are kept across the Group. Accurate recordkeeping and reporting not only reflects the Group's reputation and credibility, it is also essential for the decision making process and ensuring that the Group meets its financial, legal and reporting obligations. Therefore records created by the Group are considered a valuable asset of the Group.

Any attempt to falsify or misrepresent records or information amounts to fraud and will not be tolerated by the Group. Falsification and misrepresentation of records or information can lead to civil and criminal liabilities for us and the Group.

In ensuring proper records are created, stored and archived, we will:

- Ensure that transactions entered into by the Group are properly recorded, authorised and in compliance with all applicable reporting standards, laws and regulations where the Group operates.
- Secure and safeguard these records in accordance with approved procedures and processes.
- Maintain proper records and ensure that they are accurate, up-to-date, legible, readily identifiable and easily retrievable.
- Handle all records in accordance with the appropriate level of confidentiality and applicable policies and procedures as well as relevant laws and regulations.
- Perform or process transactions that we are authorised to do.
- Record all transactions accurately, completely and promptly.
- Process and/or approve legitimate and adequately supported transactions, in accordance with the approved authority limits.

- Preserve the confidentiality of and safeguard the records under our control.
- Ensure that any alteration or deletion of records is properly authorised.
- Ensure that removal of any records, in particular financial records, is properly documented.
- Ensure that the Group's records are not copied by unauthorised persons, including IT vendors.
- Keep records relating to any audit, investigation and legal proceeding intact regardless of whether such records have exceeded the normal retention period, or whether a notice has been issued by the Legal Department and/or any investigating department.
- Report any potential fraud or other misrepresentation of information, accounting or otherwise.

When handling records, we will **not**:

- Conceal, alter or falsify any document or distort the true nature of any transactions, company records, accounts or documents.
- Intentionally make a false or misleading entry in a record, report, file or claim.
- Impede or frustrate an investigation or audit, whether internal or external, by not cooperating fully and truthfully or by concealing or misstating information.



**Q** Can I leave my PC unattended for five minutes?

**A** Do not leave your PC unattended, even for a short period. Lock your PC when stepping away.

**Q** I received a suspicious email with an attachment and a web URL. What should I do?

**A** Do not respond to the email. Report immediately to [helpdesk@simedarbyproperty.com](mailto:helpdesk@simedarbyproperty.com)

**Q** Can I copy all files from my corporate PC to my personal USB storage devices (thumb drive, hard disk, etc.)?

**A** Company information must not be copied, transferred, or downloaded from a multi-user system to a personal computer or a workstation using any method.



# 4

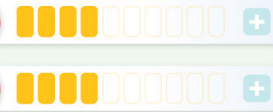
## OUR COMMITMENT TO FOSTER OPEN AND HONEST COMMUNICATION



04

SKILLS

Sime Darby Property



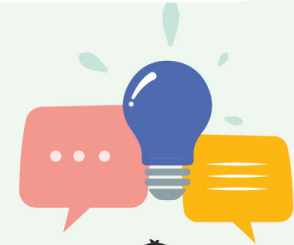
FULL

### OUR COMMITMENT TO FOSTER OPEN AND HONEST COMMUNICATION

#### LV 4: CHAMPION

4/10

Your voice is being heard.



#### Communicate Professionally:

Be courteous. Listen to what others have to say without dismissing or discrediting their opinion or feedback. Refrain from using foul language.



#### Interacting on social media:

Be mindful of your online interactions and posting. Respect the audience by not using ethnic slurs, personal insults, or obscenity.



#### Be transparent with external stakeholders:

Communicate when you are authorised to do so. Make sure all information given is accurate.



# 04

## OUR COMMITMENT TO FOSTER OPEN AND HONEST COMMUNICATION

Communication, be it written or spoken, plays a crucial role in all aspects of a business. It helps build trust and assists in developing successful teamwork, relationship and partnership.

### 4.1 Communicating Openly and Honestly with Each Other

We are committed to fostering an environment where we can communicate honestly and openly, regardless of our position within the Group. We practise an open door policy which encourages us to share our opinion, give feedback or highlight any issues to our supervisor.

As part of our employee engagement initiative, we interact through townhall sessions, Group announcements and informal get-togethers.

When communicating with our colleagues, we must:

- Be professional and respectful.
- Refrain from using foul language.
- Listen to what they have to say without immediately dismissing or discrediting their opinion and feedback.
- Provide constructive criticism and feedback while maintaining our professionalism.
- Consider the most effective channel to convey our message, whether through email, inter-office memo, phone call or face-to-face interaction.

### 4.2 Communicating Truthfully, Accurately and Timely with External Stakeholders

Building trust with external stakeholders requires communication that is clear, truthful and accurate. We are committed to communicating openly and honestly with our external stakeholders.

As a public-listed company, we recognise that certain communication will have an impact on the market and carries legal implications. At the same time, we must also ensure that the information provided is reflective of the situation or transaction concerned. Therefore, we have authorised certain spokespersons within the Group to speak on our behalf or to officially release such communication.

Before communicating with external stakeholders, we must ensure that we:

- Only communicate on behalf of the Group if authorised to do so.
- Always consult the authorised parties or functions in accordance with the Group's stakeholder engagement policy about the content of any messages before we make the communication.

### 4.3 Interacting on Social Media

Social media has become one of the most important communication tools used by companies and individuals to interact with one another. We recognise its importance and the Group has developed guidelines to assist us how to interact on social media platforms as individuals or on behalf of the Group.

When communicating through social media platforms, it is our responsibility to protect the reputation and brand image of the Group.

Whilst the Group respects our rights to explore and participate in social media communities, we must always be mindful that any posting or comment made is public and

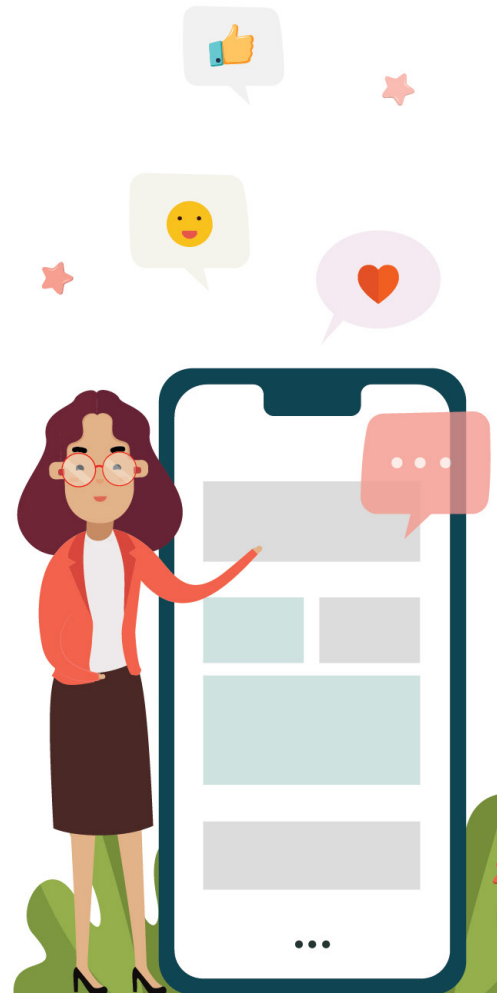
permanent in nature. Hence, we must, at all times, be guided by good judgement and common sense. We must be conscious that our right to engage in social media as a form of self-expression will necessarily need to be balanced against the Group's expectations in furthering its business as well as protecting its reputation, goodwill and branding.

If we are responsible for managing the Group's official social media accounts, we must ensure that all activities do not breach the Group's Social Media Policy and Guidelines.

While interacting on social media platforms, we must:

- Protect the reputation, interest and property of the Group at all times. Be responsible and exercise caution in publishing our comments and postings.
- Be mindful that our comments and postings may have a legal impact or may lead to legal dispute or other proceedings.
- Ensure that the remarks made on private platforms are a reflection of our own opinion only and cannot be misconstrued as the official view of the Group.
- Refrain from posting any materials created by another party without expressly stating the source of such materials.
- Avoid posting comments relating to any discontentment that we may have against the Group, superior officers, or other colleagues. There are internal mechanisms available to address such issues.
- Avoid posting any comments or remarks that are seditious in nature.
- Respect our audience by not using ethnic slurs, personal insults, obscenity or engage in any behaviour deemed unacceptable to the Group. Readers will associate us with the Group.

- Be aware that all content posted online, even on private or personal accounts, is in the public domain and hence, we will be liable for our actions.
- Not cite or reference customers, counterparties and/or business partners without their express written approval.
- Not divulge or disclose the Group's confidential or proprietary information without the express written approval of Management.
- Not make statements or speak on behalf of the Group in our personal capacity.



• FREQUENTLY ASKED QUESTIONS •

**Q** One of our house buyers was very upset with the condition of his house. He came to the showroom to complain and shouted at the staff. How should we handle such situation?

**A** Listen to their complaints and understand the situation. Try to provide a solution to the buyer.

**Q** To increase the sale of the property, can we provide exaggerated information to attract buyers?

**A** No, you cannot. Buyers must be given true and accurate information about the products being sold.



**Q** I am unhappy with my boss and want to rant about him on my social media account. Will I get into trouble for it?

**A** You should not do that as there are proper internal channels to address your issues. It is important to note that any content posted online, even on private accounts, is in the public domain and you can be held liable for your posts.



**OUR COMMITMENT TO ETHICAL CONDUCT**

OUR COMMITMENT TO ETHICAL CONDUCT

LV 5: VETERAN

5/10

Your integrity will be tested, but you will do what's right.



**1** Do not get involved in any form of criminal activity.

**2** Say **NO** to bribery and corruption. Report if you encounter it.

**3** Remember and live by the Group's "No Gift Policy".

**4** Speak to your immediate superior if you find yourself in an actual or potential conflict position.



# 05

## OUR COMMITMENT TO ETHICAL CONDUCT

- Immediately report the suspected illegal or criminal activities in accordance with the guidance provided under Section 1.3 of the COBC.

We understand that if we are found guilty by a court of law or found to be involved in illegal or criminal activities, we will be dealt with in accordance with the Group's relevant policies and procedures.

### 5.1.2 Money Laundering and Financing of Terrorism

Money laundering is the process of hiding the true nature or source of illegally obtained funds and passing it surreptitiously through legitimate channels by means of bank deposits, investments or transfers from one place (or person) to another.

Anti-money laundering legislations are designed to help prevent legitimate businesses from being used by criminals for this purpose, and to assist law enforcement agencies to trace and recover criminal assets.

It is therefore important that we do not become associated, directly or indirectly, with the criminal activities of others. In particular, we must ensure that the Group does not receive, use or otherwise deal with the proceeds of criminal activities, as this can amount to the criminal offence of money laundering.

As such, we are prohibited from participating in activities that launder money. We must immediately notify GCO if we have any suspicions about actual or potential money laundering activity.

We will take appropriate measures to prevent money laundering in our operations. The measures include, but are not limited to, reporting suspicious transactions, such as payments between unknown entities through an excessive number of intermediaries, high-value cash transactions, or payments

### 5.1 Prohibition on Illegal and Criminal Activities

#### 5.1.1 Illegal Substances and Criminal Activities

We do not tolerate criminal activities at our workplace. Using, possessing or dealing with any illegal substance is strictly prohibited. Appropriate action will be taken against anyone involved in such activities.

To avoid disciplinary action, we must **not**:

- Possess or place any illegal substance at work.
- Be under the influence of any illegal substance while at work.
- Trade or sell any illegal substance at work.
- Use the Group's property or asset to store or transport any illegal substance.
- Encourage or promote the use of any illegal substance to colleagues, Business Partners or Counterparts.
- Incite or engage in criminal activities.
- Assist or be complicit in criminal activities.

Where possible, we must:

- Discourage others from engaging in such activities (illegal substances and criminal activities).

made or received by suspicious entities or involving high-risk countries.

To ensure compliance with anti-money laundering and counter-terrorism financing requirements and the Group's Anti Money Laundering Policy, we must ensure that:

- We do not knowingly deal with criminals, suspected criminals or the proceeds of crime.
- We are aware of warning signs or red flags indicating money laundering activities, and do not ourselves engage in such acts, such as:
  - Paying in currencies that differ from that stated in the invoice.
  - Attempting to pay in cash or Cash Equivalent (as opposed to normal business practices).
  - Receiving payments from those who are not party to the contract.
  - Executing payments or deposits into accounts of those not party to the contract.
  - Transferring funds to a bank account in the name of a different third party or outside the country of their operation.
  - Making payments in a form outside the normal terms of business.
  - Splitting payments across several bank accounts.
  - Overpaying or over-invoicing.
  - Receiving payments from multiple bank accounts in relation to one customer/transaction.
  - Receiving payments from bank accounts overseas when the customer is not a foreign client.

## 5.2 Avoiding Conflicts of Interest

Conflicts of interest can have significant impact on the business and the reputation of the Group. A conflict of interest arises when personal interest, financial or otherwise,

interferes with objectivity in performing duties or exercising judgement on behalf of the Group. As such, conflicts of interest must be avoided at all times.

We are aware that potential or actual conflicts of interest may arise in various instances such as, but not limited to, when we:

- Deal with Suppliers, Customers, Agents and Competitors.
- Deal with any company within the Group.
- Have or take outside employment or engage in activities outside the Group.
- Consider and accept Board memberships.
- Deal with family members, friends or other close personal relations in our official capacity with the Group.
- Make an investment decision.

If we find ourselves in a situation of conflict, whether actual or potential, we will speak to our immediate superior or Head of Department/Function so that the conflict can be managed properly.

The Head of Department/Function must take the necessary action to manage, resolve or provide dispensation under permissible circumstances as prescribed in the Groups Conflict of Interest Policy. The Head of Department/Function should consult with relevant internal parties to facilitate deliberation or seek advice from GCO.

All potential and actual conflicts must be reported in writing as soon as practicable using the prescribed conflict of interest form or through the online platform that is made available through the internal portal.

As a general rule, for situations of conflict faced by:

- An Employee who is of Senior Vice President (SVP) grade and above and Head of Department/Function, disclosure via the prescribed form and approval

from the Group Managing Director must be sought.

- A Director, disclosure to the Board is required, and where relevant, prior approval of the shareholders must be sought, in accordance with applicable laws and regulations.

Once consultation and approval is obtained, we must:

- Comply with all requirements and agreed action plans to resolve the conflict.
- Continue disclosing the conflict annually if the conflict is on-going or remains unresolved.

### 5.2.1 Ensuring Transactions with Suppliers, Customers, Agents and Competitors are conducted at Arm's-length and in the Best Interest of the Group

There would be times when we have to deal with Suppliers, Customers, Agents and Competitors either in our official or personal capacity.

We expect all actions and decisions made with regard to Suppliers, Customers, Agents and Competitors in our official capacity to be made in the best interest of the Group.

Should we have a personal relationship or friendship with any Suppliers, Customers, Agents or Competitors, we will exercise care when acting in our official capacity so that our personal relationship does not affect or appear to affect our ability to act in the best interest of the Group.

If we are dealing with Suppliers, Customers, Agents and Competitors on a personal basis, we will ensure that the dealings are made and conducted at arm's-length, whereby the terms of the transaction are not more favourable than those offered to the public or other Suppliers, Customers, Agents and Competitors, (example as those offered as corporate discounts to the Group) other than as permitted by the Group.

To avoid any potential conflict of interest in dealing with Suppliers, Customers, Agents and Competitors, we must:

- Make business decisions in the best interest of the Group and avoid situations of conflict at all times.
- Notify our supervisor and agree on the best method to manage the following situations:
  - Family members are working for or providing any services to an actual or potential Customer, Supplier, or Competitor.
  - We or a family member have an interest (whether direct or indirect) in a Supplier, Customer, Agent or Competitor.
  - We are interested in taking up in a personal capacity a proposed directorship in a Supplier, Customer, Agent or Competitor.
  - Our friends are employed by or are owners (whether full or partly) of a Supplier, Customer, Agent or Competitor.

To avoid putting ourselves in a position of conflict of interest, we or our family member or any person with whom we have a close personal relationship must **not**:

- Have any financial interest in a Supplier, Customer, Agent or Competitor of the Group. However, this condition does not apply if such interest is in a public-listed company whereby the equity interest is below 5%.
- Receive commissions from any Supplier, Customer, Agent or Competitor.
- In the case of selling agents appointed by companies within the Group, their customers must be aware that these agents are paid a commission similar to any normal commercial transaction. In such cases, there is no requirement to seek the approval of the buyers.

- Take or divert to others any business opportunity that arises in the course of our work with any Supplier, Customer, Agent or Competitor.
- Work for or provide any services to Competitors, Customers or Suppliers unless prior written approval is obtained from the Group Managing Director.

### 5.2.2 Prohibition of Dealings with any Company within the Group

We should not have any personal business dealing or contract with any company within the Group, apart from purchases of items for personal use, in which case the terms must not be more favourable than that offered to the general public.

This prohibition does not extend to the sale and purchase of products and services that are covered and provided for under the employee discount or promotional scheme.

### 5.2.3 Restriction on Outside Employment and Activities Outside the Group

We recognise that we are prohibited from taking up employment outside the Group or engaging in any outside business/service which may be in competition with the Group or give rise to actual, perceived or potential conflicts of interest with our duties to the Group.

- We must not allow personal activities (financial or otherwise) to affect or be perceived to affect the way we carry out our jobs.

Unless written approval is obtained from the Group Managing Director, we must **not**:

- Be a member of any government, quasi-government or statutory body.
- Become an office bearer, council member or committee member of trade or professional associations.

- If approval is provided to engage in employment and activities outside the Group, we must:
  - Take steps to ensure the role will not create an actual, perceived or potential conflict of interest.
  - Ensure the role does not distract us from our work commitments.
  - Ensure that the time taken to perform the role is not excessive.

Any fees or remuneration accrued through such appointments must be surrendered to the Group. However, this requirement does not apply to our membership in social or community-related clubs and associations.

### 5.2.4 Accepting Board Membership Outside the Group

Serving on boards outside the Group, whether in government agencies / bodies and/or companies / unincorporated entities, can present a situation of conflict of interest and potentially distract us from discharging our duties. The Group may allow us to accept board membership of companies or bodies which are bodies relevant to the Group's industry/businesses or which would benefit the Group. In these instances, approval to accept such appointment must be obtained beforehand and time spent attending such board meetings will be accorded as company's time.

To manage this risk, approval to serve on boards outside the Group will only be allowed in exceptional circumstances.

We must obtain approval from the Group Managing Director prior to accepting or serving on boards outside the Group. For Senior Management, the Group Managing Director shall make a recommendation to the Nomination and Remuneration Committee for its approval. For the Group Managing Director, the Board Chairman's approval is required.

All fees and/or remuneration received in connection with such service must be paid over to the Group. Board appointments related to family businesses are exempted from this policy.

### 5.2.5 Ensuring Family Members and Close Personal Relations Do Not Create a Conflict

We recognise that there are times when our family members or close relatives may be employed by the Group directly as Employees or as vendors or consultants. Hiring of family members or close relatives, whether as Employees or as vendors or consultants, should only be made based on qualification, performance, skills and experience, and in accordance with the Group's policies and procedures and in compliance with the Group's Conflict of Interest policy.

Generally, employment of family members or close relatives does not create a conflict of interest unless we:

- Are directly involved in the hiring or selection process, which includes having the ability to influence the outcome of the process or having a say in the terms and conditions of such employment.
- Become their supervisor or are otherwise involved in or able to influence their performance appraisal, promotion, bonus or salary increment.
- Have the power to approve the decision to hire or award the contract as vendor or consultant to the relative.

For matters involving family members or close personal relations we must:

- Declare and disclose the relationship and the business activities involved through the Conflict of Interest form; and
- Abstain from any selection and/or decision-making process.

### 5.2.6 Engaging in Personal Investment Activities

The Group recognises and respects our rights to be a part of any investment activity, including our right to make personal investments.

However, our personal investment actions or decisions should not create a conflict with the Group's interests or impair our ability to make objective and independent judgements for the Group.

### 5.3 Prohibition of Insider Trading

We may, as part of our duties and scope of work, create, use or have access to confidential (non-public) and material information ("inside information") that, if shared with external parties, would be expected to have a material effect on the price or the value of the Group's or other traded securities ("price sensitive information"). This is due to the fact that this price sensitive information is not generally available to the investing public when making their investment decisions.

Confidentiality of such inside information must be maintained and disclosure is prohibited unless required by any order of any court of competent jurisdiction or any competent judicial, governmental or regulatory authority. Disclosure of material, non-public information to others can result in civil and criminal penalties.

Like any other public-listed company, the Group is subject to various regulations governing the trading of its securities which include but are not limited to the requirement by law to make timely, full and fair public disclosure of information that may have a material impact on its stock prices. It is the policy of the Group to comply fully with these requirements, which includes assisting its employees to fulfil the compliance requirements. We must ensure that we comply with the Group's Insider Dealing policy at all times.

While in possession of inside information, we must **not**:

- Buy or sell securities of the listed company(ies) to which the inside information relates.
- Tip off others.
- Encourage anyone to buy or sell securities of any listed company even if they do not profit from the arrangement.

## 5.4 Guarding against Bribery and Corruption

We take a zero-tolerance stance against any form of bribery and corruption in all our business dealings. We take our ethical and legal responsibilities very seriously and we are committed to conducting our business professionally, ethically and in compliance with anti-bribery and corruption laws and regulations and treaties in all countries in which the Group operates.

### 5.4.1 Zero Tolerance for Bribery and Corruption

We strictly prohibit any attempts to influence business decisions directly or indirectly by paying or receiving bribes and kickbacks or any other methods deemed unethical. Such acts will not only expose the Group to severe legal consequences, including penalties and imprisonment, but will also have an adverse impact on our reputation and branding.

We will protect our employees from any adverse consequences such as demotion, reprisals or retaliation arising from their refusal to give or accept bribes or engage in any corrupt practices. This protection is given even if such action (refusal) may result in the company losing its business or not meeting its targets.

To avoid being implicated in a corrupt act, we must **not** directly or indirectly:

- Give, promise, offer, grant or authorise the giving of money or anything else of value, to anyone to obtain or retain a business or an advantage in any business dealing.
- Solicit, receive, agree to receive or authorise the acceptance of money or anything else of value, from anyone to influence the outcome of any of the Group's business decisions.
- Be involved in any corrupt conduct, which includes but is not limited to the abuse of position/authority and falsification of documents.
- Receive commissions that may be perceived as bribes or used by the recipient to pay bribes or for other corrupt purposes.
- Make and/or receive facilitation payments ('grease payments') which are regarded as payments to gain access, secure or expedite the otherwise routine function that a person is duty-bound to perform.
- Be involved in any activity or behaviour that could give rise to the perception or suspicion of any corrupt conduct or the attempt thereof.
- Conceal or take any step that could delay information that a bribe, improper advantage or facilitation payment has been given or received.

As part of the Group's effort to prevent corrupt acts, we must:

- Endeavour to ensure that Counterparties and Business Partners do not promise, offer or give any such improper payments (whether money or anything else of value) or improper advantage purportedly for or on behalf of the Group.

- Inform GCO when we encounter any request for a bribe or facilitation payment or if a payment which could possibly be misconstrued as a bribe or facilitation payment has been made.
- Inform GCO when we are offered or promised a bribe, or otherwise asked to participate in a corrupt act.

In the event of any breach of this policy and to the Group's Anti Bribery and Corruption Policy, we will not hesitate to take all necessary action, including but not limited to taking disciplinary action and filing the necessary reports with the relevant authorities.

### 5.4.2 Avoiding the Perception of Bribery in the Form of Gifts, Entertainment and Travel

We recognise that business hospitality in the form of gifts, entertainment and travel builds relationships with Counterparties and Business Partners. We accept that there are occasions when provision and acceptance of such business gifts and hospitality is appropriate and should not create an appearance of unfair advantage/benefit and impropriety or be misconstrued or perceived to be a bribe or gratification.

To avoid the risk of creating an appearance of unfair advantage or impropriety, the provision of such gifts and hospitality as part of normal business operations must be legitimate, proportionate in the context of our operations and occur sparingly.

We also acknowledge that the practice of giving business gifts and hospitality varies between countries and regions, where what appears to be normal and acceptable in one may not be in another. Provision of such gifts and hospitality must be sensitive to this norm, which includes the recipient organisation's policy regarding the receipt of gifts and hospitality.



### (i) Gifts – No Gift Policy

A gift received or offered can sometimes appear as an attempt to gain an unfair advantage or benefit, such that the gift may be perceived to be a bribe or gratification. A gift could also put the giver and receiver in a position of conflict as it may influence decision making.

Gifts can be in the form of cash or Cash Equivalent, personal services or otherwise.

To reduce the risks above and to minimise the need for us to examine the reasons and ethics behind the acceptance and provision of gifts, we have adopted a "No Gift Policy" which prohibits the use of gifts, entertainment and travel (except for the exclusion below) to influence business decisions.

The No Gift Policy is in line with our commitment to achieve the highest standard of ethics and integrity. The No Gift Policy strictly prohibits us from giving, agreeing to give, offering, soliciting, accepting or agreeing to accept gifts of any kind or value offered by and to current and potential Counterparties, customers, business partners, employees or any other individual or organisation (collectively known as third parties) at any time, regardless of the reasons behind the gifts.

The No Gift Policy excludes the provision of the following gifts:

- Token, corporate gifts, plaques or trophies and promotional items (of nominal value) which bear the name of Third Parties.

- Promotional gifts such as t-shirts, pens, trade show bags and all other ornaments that Employees may obtain, as members of the public, at events such as conferences, training events, seminars, and trade shows that are offered equally to all members of the public attending the event.
- Festive cards, thank you notes, certificates, or other written forms of thanks and recognition.
- Exchange of gifts at the company-to-company level.

To ensure that we are protected against any allegation of impropriety, we and members of our family must:

- Not directly or indirectly solicit, accept, and/or agree to accept gifts from Counterparties or Business Partners.
- Apply the No Gift Policy in good faith.
- Ensure any gift provided to Counterparties or Business Partners (which must fall within the list of gifts excluded from the No Gift Policy as set out above) as part of normal business operations is not considered to be excessive and does not give rise to an inference of improper advantage or create an actual or perceived conflict of interest.

If a gift is offered or delivered, we must:

- Politely decline the gift and explain the Group's No Gift Policy.
- Disclose to our Head of Department verbally and document the offer received via a prescribed Gift, Entertainment and Travel ("GET") form.
- Where practicable, return the gift.
- Surrender the gift to Head of Department in exceptional circumstances where such gift cannot be returned or where such gift has to be accepted to avoid causing serious offence.

We will donate all unreturnable gifts to a preferred charity, where practicable.

## (ii) Entertainment

Entertainment, as with gifts, when provided excessively and are disproportionate to the context of the business activities, can compromise Employees' ability to make objective business decisions in the best interest of the Group.

Therefore we must **not**:

- Solicit any form of entertainment from Counterparties or Business Partners directly or indirectly.
- Offer entertainment that are indecent and sexually oriented.

However, we may accept invitations to social events or entertainment within the scope of work on condition that these are **not**:

- Lavish affairs and exceed the approved monetary limits as set out in the Group's Gift, Entertainment and Travel Policy.
- A regular feature that they begin to influence the business decision-making process.
- Indecent, sexually oriented or that otherwise might put ourselves in a position of conflict or adversely affect the Group's reputation.

To protect us from any allegations of impropriety, where possible, we will disclose such invitation or attendance through the prescribed GET form.

## (iii) Travel

Travel, as with gifts, poses a risk to us when it is provided and accepted excessively and is disproportionate to the context of the business activities. To avoid this risk, we will bear the cost of all business travel incurred.

Unless prohibited by law or the policy of the recipient organisation, we may bear the reasonable and proportionate costs of transportation and lodging for Counterparties, Business Partners or other stakeholders in connection with a visit to the Group's facility. The visit must be for a legitimate business

purpose e.g. on-site examination of equipment, contract negotiations or training.

We and our family members will not accept lodging and other benefits (e.g. food, transportation) provided by Counterparties, Business Partners or other stakeholders even if the trip is for business purposes. However, we may accept one-off hospitality during a business trip in the form of a reasonably-priced meal during or after work.

### 5.4.3 Providing Donations and Sponsorships for Worthy Causes

We provide donations and sponsorships as part of our initiative to contribute to worthy causes in various communities or society in general.

A sponsorship can be in the form of contribution in cash, in kind, or in services to support an event, activity, person or organisation. Examples of sponsorship events or activities include but are not limited to academic, sporting, music, cultural activities, business/technology events, and environmental and community events.

A donation on the other hand is a provision of cash or other items of value. Donations are usually made to assist in disaster relief, in support of health-related organisations or activities, or to a charity or Non-Governmental Organisation ("NGO") that provides for people in need either nationally or internationally.

We endeavour to support organisations and/or individuals who share our goals and values and can demonstrate their effectiveness in meeting their stated goals, are well-administered and are able to manage the funds properly.

Every sponsorship or donation that we make shall comply fully with applicable laws and regulations, including anti-bribery and

corruption legislation, and will be given through legal and proper channels. We will not donate to private individuals (unless it is for educational sponsorship) or private accounts or to individuals or organisations that could prove harmful to our reputation or if their activities are in conflict with our values or objectives.

The Group reserves the right and has sole discretion to terminate support for a sponsorship/donation event or programme when:

- A situation arises that creates a conflict with the COBC, or such conflict otherwise becomes apparent.
- The initiative, event or programme no longer supports the best interests of the community, the Group or its Employees.
- The terms of the agreement are not being met.
- Signs of misconduct or conflict of interest become evident and known.

Even though the sponsorship or donation is done with good intentions at heart, such acts, however legitimate, may nevertheless run the risk of being misconstrued as bribery or corruption.

As such, we must ensure that all donations and sponsorships from the Group are:

- Given through legal and proper channels; recipient organisations and charities must be legitimate and able to properly manage and account for the use of such funds.
- Justified, reasonable in value and frequency and not in exchange for inappropriate advantage or benefit. It should not place the Group in situations that may potentially lead to a conflict of interest.
- Given directly in good faith, an open and transparent manner, and not to, or for the improper benefit of, any individual.

• FREQUENTLY ASKED QUESTIONS •

- Not offensive or inappropriate.
- Not be deliberately structured as an arrangement to avoid approval requirements.
- Approved in accordance with established procedures before being provided.
- Accurately recorded.

We must also:

- Make necessary enquiries and conduct due diligence to ensure the actual beneficiaries of the donation are not linked to government officials or their families as this can be seen as a way to influence official decisions to benefit the company.
- Report any evidence of misconduct or conflict of interest once we become aware of the same.

Any request for donation or sponsorship received by Directors must be referred to the Group Managing Director.

**5.4.4 Regulation on Political Contributions**

We will observe all applicable laws and regulations concerning political contributions in the countries that we operate in.

Corporate political contributions are strictly regulated and must be approved by the Board. All political contributions will be properly recorded.

For the purpose of clarity, political contributions or expenditure include, but are not limited to:

- Paying for advertisements and other political campaign expenses.
- Buying tables for fundraising dinners organised by a political party.
- Loaning/permitting Employees to support political events during working hours.

We must ensure that:

- Without the prior written approval of the Board, we will not use the Group's funds or resources, either directly or indirectly, to help fund political campaigns, political parties, political candidates or anyone associated with them. This includes making political payments under the guise of charitable donations on behalf of the Group.
- Any contributions towards, and in support of, political parties must be made personally and give no impression of being connected to the Group.
- Any personal political support or contributions do not affect our performance or objectivity at work.



**Q** My aunt is a Director of one of our supplier companies. I am not sure if this creates a conflict of interest. What should I do?

**A** Formally disclose the relationship to your Head of Department via the conflict of interest disclosure form. Work with your Head of Department to determine whether a conflict of interest arises.

**Q** Our business partner offered to entertain our staff with a holiday in a 5-star hotel as a token of appreciation for the business relationship. Can we accept?

**A** No. We cannot accept the hospitality. Decline the offer and remind them of our No Gift Policy. Report to the Head of Department and Group Compliance Office of the offer received.

**NO GIFT POLICY**





## OUR COMMITMENT TO OUR COUNTERPARTIES AND BUSINESS PARTNERS

**06**

**SKILLS**

Sime Darby Property

FULL

Four progress bars are shown, each with a red icon and a plus sign. The icons represent a document, people, a headset, and a camera. Each bar is filled with yellow segments, indicating a 75% completion rate.

### OUR COMMITMENT TO OUR COUNTERPARTIES AND BUSINESS PARTNERS

#### LV 6: EXPERT

6/10

You're making Business Partners happy. Keep it up!

Work with counterparties and business partners that share our values.

Share our values with our counterparties and business partners.

Be impartial and objective when dealing with our partners.

Select our business partners based on merit, price, quality of service, financial capability, integrity, and ethical standards.

Refrain from doing business with any party that can cause harm to our reputation.



• FREQUENTLY ASKED QUESTIONS •

# 06

## OUR COMMITMENT TO OUR COUNTERPARTIES AND BUSINESS PARTNERS

We value our partnerships with Counterparties and Business Partners and we are committed to establishing mutually beneficial relations with them.

We will deal with them honestly and treat them fairly in the same way that we expect to be treated. Our business dealings will be impartial, objective and free from all influence inside and outside the Group. Qualified parties will be selected based on merit, with due consideration given to matters such as price, quality of service, integrity and ethical standards.

In return, Counterparties and Business Partners are expected to conduct business ethically, without attempt to influence business decisions by offering gifts, entertainment, or favours that would create a conflict of interest. Counterparties and Business Partners are also expected to maintain the confidentiality of information they become privy to as part of their business dealings with the Group.

We seek to do business only with those who comply with all applicable legal requirements and whose actions are consistent with provisions in the Vendor COBC. Counterparties and Business Partners may be blacklisted for non-adherence to the Vendor COBC and/or applicable legal requirements.

Consistent with our effort to foster stronger ties with Counterparties and Business Partners, we are expected to:

- Conduct business in accordance with the ethical principles set out in the COBC and Vendor COBC.
- Share the principles of COBC and Vendor COBC with Counterparties and Business Partners.
- Present the Group's products in an honest and forthright manner.
- Refrain from conducting business with any party that can cause harm to our reputation, and who violate laws and regulations on matters such as safety, environmental conservation, anti-bribery or anti-trust.

When dealing with Counterparties in particular, we must ensure that:

- Any procurement decisions are made solely in the best interest of the Group and in compliance with our procurement policies and procedures.
- Payments made, if any, must be commensurate with the value of services or products provided.
- Commissions and fees payable either to dealers, distributors, agents or consultants, while legitimate under most local legislations and covered by legally binding contracts between the Group and Counterparties, must be reasonable in relation to the products and services provided. As such:
  - These payments must be benchmarked against industry standards.
  - Care must be exercised to ensure the legitimacy of the recipient of the payment. Be aware that making an offer or payment to a company rather than an individual does not make it legitimate.
- Consult when in doubt. Any concerns about the legitimacy of any payment must be brought to the attention of the Chief Risk and Compliance Officer, who may then consult the Head, Legal.

**Q** Can we work with business partners who refuse to adopt or acknowledge the principles in our Vendor COBC?

**A** No, we cannot work with business partners who do not subscribe to or acknowledge the principles in the Vendor COBC.

**Q** Can we engage and appoint a business partner based on trust i.e. a company that we have engaged in the past without going through proper due process?

**A** No, you cannot. All engagements, including the appointment of business partners, must follow our due process and requirements.



### OUR COMMITMENT TO OUR CUSTOMERS

**07**

**SKILLS**

Sim Darby Property

FULL

**LV 7: CHAMPION**

7/10

You're pulling in satisfied customers.



### DO



**Respect:**  
Respect customers' decisions at all times.



**Give Sufficient Info:**  
Provide accurate and sufficient information for customers to make informed choices.



**Accept Feedback & Comment:**  
Listen to customers' feedback to enhance the quality of products and services.

### DON'T



**Disclose Customers' Information:**  
Do not disclose customers' information to anyone. Always keep it confidential.



**Practise Discrimination:**  
Treat all customers equally and without any discrimination.



**Offer Unauthorised deals/promises:**  
Do not offer unauthorised deals or promises to customers.

# 07

## OUR COMMITMENT TO OUR CUSTOMERS

### 7.1 Respecting Customers' Rights and Choices

We are committed to developing, producing, marketing and selling our products and services responsibly.

We value our customers' views, feedback and requirements so that we can design and deliver the product that meets the customers' needs and expectations in terms of price, timeliness and quality.

As we promote our products and services, it is our endeavour that our marketing activities will:

- Respect others' decision whether to buy our products and services or not.
- Provide sufficient information about our products and services for informed choices to be made.
- Reflect and respect generally accepted contemporary standards of good taste and quality, with awareness of the sensitivity of different cultural, social, ethnic and religious groups.

When dealing and interacting with customers, we will:

- Be honest and treat them with respect.
- Provide them only with truthful and accurate information about our products and services.
- Not offer, promise or provide anything to a customer in exchange for an inappropriate advantage for the Group.

- Listen to their feedback to enhance the quality and reliability of our products and services.
- Report all customer complaints promptly to the Customer Relationship Management Department.
- At all times, respect applicable sales and marketing laws.

When designing or managing a marketing campaign, we must not associate our products or services with themes, figures or images likely to cause serious or widespread offence to any religion, nationality, culture, gender, race, sexual orientation, age group, disability or minority group.

### 7.2 Competing Openly and Fairly

We are committed to open and fair market competition to give our customers a choice of products and services at competitive prices.

We will conduct our operations in accordance with these principles and will comply with all applicable competition and anti-trust laws and regulations applicable in the countries where we operate as they are designed to promote healthy competitive markets and protect the interests of consumers.

We recognise that any infringement of these laws and regulations can lead to civil and criminal liability for both the Group and its Employees. The Group therefore will not authorise or condone any conduct that could give rise to any appearance of impropriety or infringements of such laws and regulations.

We must ensure that we do not use illegal or unethical methods to compete in the market. These include:

- Exchanging salient information with competitors.
- Fixing prices or pricing terms.
- Dividing up markets, territories or customers.

- Rigging a competitive bidding process (such as by submitting sham bids).
- Collectively boycotting a certain customer or taking joint action against a competitor.
- Adopting strategies to illegally exclude competitors from the market through anti-competitive bundling or predatory pricing.
- Asking our customers or other intermediaries to be the "middleman" for the exchange of sensitive information between competitors. Only gather and use competitors' information that is known to be legitimate.
- Using contacts established during industry or trade associations' events for anti-competitive purposes. Care must be exercised when participating and establishing contacts at such events so that we do not attract allegations of impropriety. Similar care must also be applied to less formal meetings or events that involve competitors, such as awards ceremonies or associated social contact.
- We must report any instances of actual or suspected anti-competitive practices, utilising the escalation channels as prescribed in this COBC.



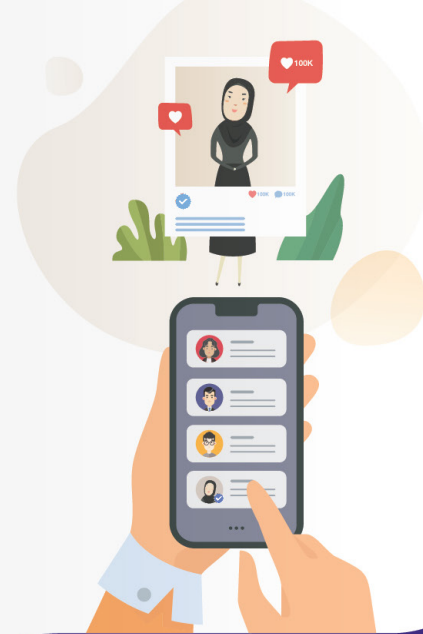
• FREQUENTLY ASKED QUESTIONS •

**Q** There is a customer who has visited the showroom many times but does not have the intention to buy. Can I warn other sales team about this customer so that they do not waste time on him?

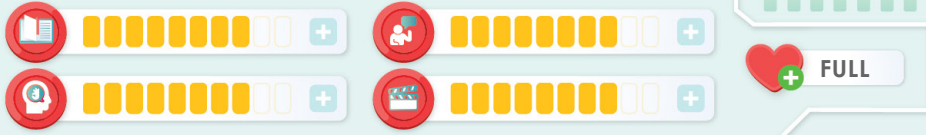
**A** No, we must still treat him as a potential buyer and afford him the services required as with any other customer.

**Q** One of our homebuyers is a celebrity, and we want to engage her for an event. Can we use her information given to the sales team to connect with her regarding the event?

**A** No. We cannot use her information for other activities without her consent.



**OUR COMMITMENT TO  
OUR ENVIRONMENT AND  
COMMUNITIES**



**OUR COMMITMENT TO OUR ENVIRONMENT AND COMMUNITIES**

**LV 8: CHAMPION**

8/10

You are helping communities thrive.

**Supporting the Society**

To support society in the areas of education, environment, arts & culture, community & health, and sports through volunteerism, donations, and sponsorships.



08

**OUR COMMITMENT TO OUR ENVIRONMENT & COMMUNITIES**

**8.1 Minimising Adverse Impact on the Environment**

We are committed to ensuring that our business operations are sustainable by operating in an economically, socially and environmentally sustainable manner, whilst balancing the needs and interest of diverse stakeholders.

We will strive to:

- Decarbonise our operations.
- Where possible, work with our supply chain to use low carbon products.
- Minimise adverse environmental impact through, at a minimum, compliance with applicable requirements.
- Seek continuous improvement in our environmental protection efforts through energy efficiency and green technology.
- Apply good biodiversity practices in our developments.
- Contribute to conservation of biodiversity and integrated approaches to land use planning.
- Facilitate and encourage responsible product design.
- Use, re-use, recycle, reduce and properly dispose of waste in our operations.

- Enhance township and product value through application of best-in-class sustainable practices.
- Take every effort to provide a safe, secure and healthy working environment.

We support internationally recognised standards and voluntary initiatives designed to protect the environment. We also strive to engage with regulators and other relevant stakeholders to foster efficient and effective interaction that will be mutually beneficial to all parties.

In pursuing the above goals, we will:

- Embed the above principles in our day-to-day actions.
- Strive for zero accidents by inculcating safety and taking reasonable care of others who may be affected by their own acts or omissions at work.
- Strive for zero defect by embedding effective quality management systems, process controls and being accountable for our actions at work.
- Support the commitment to environmental sustainability, health and safety and comply with all relevant policies and procedures and applicable laws and regulations.

**8.2 Shaping Inclusive and Resilient Local Communities**

We are committed to developing products and amenities for local communities to build resilience and promote inclusiveness.

**8.3 Respecting the Rights of Local Communities to Object to Projects That May Impact Their Land**

Based on the principles of Free, Prior and Informed Consent, we respect the rights of

• FREQUENTLY ASKED QUESTIONS •

local communities and indigenous people to object to any project that may have an impact on their lands.

We recognise that applicable laws governing land titles may occasionally ascribe competing claims to or interest in land derived through native or customary rights. To resolve such competing claims, the Group will consult the appropriate bodies such as interest groups, the local communities or state authorities.

We protect and respect the rights of vulnerable people such as marginalised groups, persons of different abilities and refugees.

**8.4 Supporting Society at Large**

We are committed to supporting our society in the areas of education, environment, arts & culture, community & health and sports, through various means such as volunteerism, donations and sponsorships.

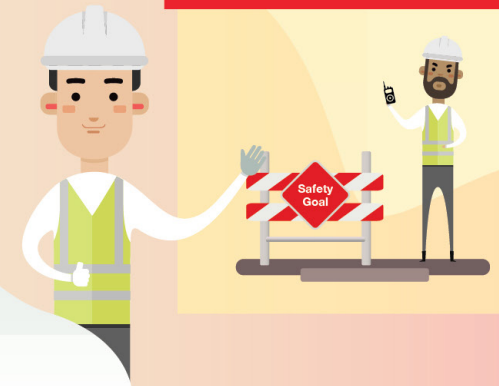


**Q** How can I help the Group in conserving energy?

**A** You can contribute to the Group's energy conservation effort by switching off the lights and other electrical items at the end of the workday or when not in use.

**Q** How can I contribute to the Group's zero fatality targets?

**A** You can help by enforcing safety standards (including stop work orders) and report any actual or potential unsafe incidents to your superior or Head of Department.



**Q** What do I do if I receive a request for sponsorships or donations?

**A** Inform your Head of Department and consult Group Corporate Communications' (CSR Unit) for all sponsorship and donation requests. Follow the required instructions and processes as stated in GPA B11 Sponsorships and Donations.

# 9



## OUR COMMITMENT WHEN WORKING TOGETHER WITH JOINT VENTURE PARTNERS AND BUSINESS ALLIANCES

09

SKILLS



FULL

### OUR COMMITMENT WHEN WORKING TOGETHER WITH JOINT VENTURE PARTNERS AND BUSINESS ALLIANCES

#### LV 9: MASTER

9/10

Proud of you! Your dedication and hard work have propelled us to a new level of success.

Work with partners that share the same values and business principles.



Share our values and principles with our partners.



Influence and incorporate our values and principles in the joint venture entity/company where possible.





# 09

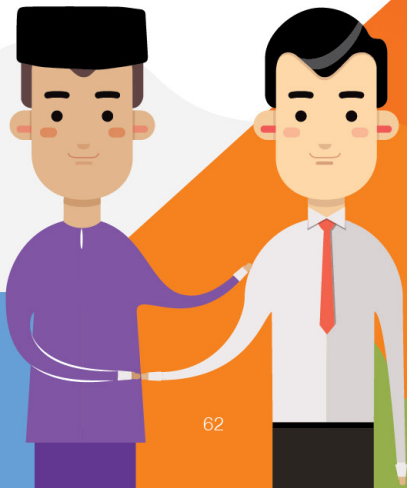
## OUR COMMITMENT WHEN WORKING TOGETHER WITH JOINT VENTURE PARTNERS AND BUSINESS ALLIANCES

We will work with companies that share our values, our business principles and our expectations of ethical conduct.

For our business partnerships forged under joint ventures, we will proactively seek to engage the joint ventures' management in efforts to assist them in developing a robust Joint Venture COBC, applying at a minimum, the key principles of our COBC.

Company representatives in the joint venture must ensure that they:

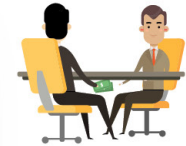
- Act in accordance with this COBC.
- Use reasonable endeavours to influence those with whom they are working to ensure that they also advocate similar standards of integrity and ethical behaviour.



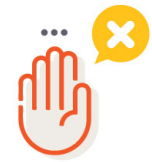
**Q** My team just kick-started a new project and I just found out that our potential Joint Venture partner was involved in a corruption scandal in the past. What should I do?



**A** You must inform your Head of Department and Group Compliance Office immediately for the next course of action.



**Q** The recommended contractor is famous for "getting the job done". They pay under counter money to get regulatory approvals. Should we select this contractor so that we don't encounter any problems with the project?



**A** No. We will not select or hire contractors that are involved in unethical practices.



# 10



## OUR COMMITMENT WHEN DEALING WITH GOVERNMENT, REGULATORS, POLITICAL PARTIES AND NGOs

10

SKILLS



Sime Darby Property

FULL

## OUR COMMITMENT WHEN DEALING WITH GOVERNMENT, REGULATORS, POLITICAL PARTIES AND NGOs

### LV 10: SIME DARBY PROPERTY HERO

10/10

You made it. Congratulations on coming this far on your journey of personal and professional growth.



#### Laws and Regulation

Comply with all laws and regulations that impact our business. This commitment extends to all countries in which we operate.



#### Enquiries from authorities/regulators

Do not attempt to deal with enquiries made by authorities or regulators if you are not authorised to do so. Refer such enquiries to the relevant authorised person within the Group.



#### Interaction with government officials

Be polite, responsive, open, and honest when interacting with government officials.

FREQUENTLY ASKED QUESTIONS

# 10

## OUR COMMITMENT WHEN DEALING WITH GOVERNMENT, REGULATORS, POLITICAL PARTIES AND NGOS

### 10.1 Complying with Laws and Regulations

We will comply with all relevant laws and regulations that have an impact on our business operations.

Our commitment extends to all countries in which we operate. This includes complying with relevant international trade laws encompassing global trade controls and economic sanctions that prohibit us from doing business with certain countries, government, entities or individuals.

We expect similar compliance from our Counterparts and Business Partners as they deal with or on behalf of the Group.

We expect Counterparties acting on behalf of or dealing with the Group to familiarise themselves and comply with such laws and regulations where applicable.

### 10.2 Maintaining Open and Transparent Relationship with Government Agencies, Regulators, Public Officials and International Organisations

The relationships we have with government agencies, regulators, public officials and

international organisations are built on a fair and transparent basis. Any contact with government agencies, public officials, international organisations or NGOs will be done with honesty, integrity, openness and in compliance with local and international laws.

We recognise that interaction with these organisations, whether formal or informal, carries inherent risk of misrepresentation or misinterpretation if not conducted properly. Therefore, interactions and communication must only be made by authorised individuals. This covers all forms of communications such as in-person, electronic media and/or written correspondence.

On occasion, we may receive formal or informal enquiries or requests for interviews. Regulators or government agencies may also conduct surprise inspections, investigations or raids. When this happens, we will respond truthfully, appropriately and promptly to the request.

We will follow the proper procedures when engaging with the regulators. We must:

- Immediately refer enquiries received from regulators to GCO or to the relevant Head of Department in accordance with the Notification and Reporting Framework.
- Obtain prior approval to communicate with or respond to government officials and regulators.
- Interact with government officials and regulators in a courteous, responsive, open, honest, transparent, and cooperative way and give them the information they would reasonably expect.
- Be appropriately trained and authorised by our line manager to engage with government officials and regulators.
- Take all reasonable steps to ensure the truth and veracity of the information provided.
- Keep a record of all contact and interactions with government officials and regulators.



**Q** What should I do if there is a raid by a regulator on our office or site?

**A** You should immediately inform your superior or Head of Department for further guidance.




**Q** What should we do if a government official is rude and hostile?

**A** Be patient, understand the situation and handle them in a professional manner. Call your superior or Head of Department to assist in the situation.

# 11 DEFINITIONS

The definitions of the key terms used in this COBC handbook are as follows:

TERMS	DESCRIPTIONS
Agent	Any party appointed and authorised to act on behalf of the Group.
Anti-bribery Laws	Laws that prohibit the offer of money, goods or services to a person in order to persuade him to perform an action, in many cases illegal, in the interests of the person offering the bribe.
Anti-trust Laws	Laws intended to promote free competition in the market place by outlawing monopolies.
Assets	Tangible or intangible resources controlled by the enterprise as a result of past transactions or events and from which future economic benefits are expected to be derived by the enterprise. Such resources shall include buildings, sites, equipment, tools, supplies, communication facilities, funds, accounts, computer programmes, information, technology, documents, patents, trademarks, copyrights, know-how and other resources or property of the Group.
Breach	Behaviour that results in any form of disciplinary action against a person or persons.
Bribery	A bribe is an inducement or reward (financial or otherwise) offered, promised or given, directly or indirectly, in order to gain any improper commercial, contractual, regulatory, personal or other advantage.
Business Partner	Any party with which the Group has a commercial relationship with but is not in a position to exercise a significant or controlling influence over, such as, Joint Ventures (non-controlling interest) and business alliances.
Cash Equivalent	An asset, such as property or stock, that has a realisable cash value equivalent to a specific sum of money, or an asset that is easily convertible to cash, for example, a Treasury bill.


TERMS	DESCRIPTIONS
Competitors	Competitors are persons or entities that render the same or very similar services or supply the same or similar products as the Group in any one or a number of business environments.
Confidential Information	<p>a. Any information in any form whatsoever not generally known, and propriety to the Group including but not limited to information relating to their processes, operations, trade, products, research, development, manufacture, purchasing, business, business prospects, transactions, affairs, activities, know-how, Intellectual Property, accounting, finance, planning, operations, customers data, engineering, marketing, merchandising and selling, proprietary trade information, payroll figures, personal data of Employees, customers' list, records, agreements and information, technical and other related information, and any books, accounts and records kept by the Group for the purpose of its business;</p> <p>b. All information disclosed to a Director or an Employee or to which the Director or Employee obtains access during his/her tenure which he/she has reason or ought to have reason to believe to be confidential information, shall be presumed to be confidential information and shall include (but shall not be limited to) price lists, business methods, customer history, records, information and inventions; and</p> <p>c. Any such information as described in (a) and (b) above which relate to any of the Group's suppliers, agents, distributors and customers.</p>
Connected Persons	<p>Connected Persons include the following:</p> <ul style="list-style-type: none"> <li>● A family member of a business partner or official, including his/her spouse, parent, child (including adopted child and stepchild), brother, sister and the spouse of his/her child, brother or sister;</li> <li>● A body corporate which is associated with that business partner or official;</li> <li>● A trustee of a trust (other than a trustee for an Employee share scheme or pension scheme) under which that business partner or official or a member of his/her family is a beneficiary; or</li> <li>● A partner of that business partner or official or a partner of a person connected with that business partner or official.</li> </ul>

TERMS	DESCRIPTIONS
Contract	An agreement that legally obliges a party to do, or not to do, a certain thing. Examples of contracts include sales and purchase contracts, service contracts and others.
Counterparties	Joint Ventures (controlling interest), consultants, agents, vendors, suppliers, contractors and goods/ service providers of the Group who have direct dealings with the Group.
Customers	Customers are persons or entities to which the Group provides products or render services to and includes potential customers.
Directors	Directors include all independent and non-independent Directors, executive and non-executive Directors of the Group and shall also include alternate or substitute Directors.
Group	Group of Companies, which includes Sime Darby Property Berhad (SDPB) and incorporated entities which SDPB controls. SDPB controls an entity when it has powers over the entity, has exposure to or rights to variable returns from its involvement with the entity and has the ability to affect those returns through its power over the entity.
Joint Venture	Business venture which is undertaken jointly with unrelated partners. May take the form of subsidiaries, associates and unincorporated entities.
Supplier	Any party that provides goods or services to the Group.

# 12 CONTACT US

If you have any questions or need further guidance, please contact Group Compliance Office via the following channels:

 [compliance@sime-darby-property.com](mailto:compliance@sime-darby-property.com)

 +603-7849 5586