

GLM REIT MANAGEMENT SDN BHD (GLM REIT)

Anti-Bribery and Corruption Policy

Why do we have this Policy?

GLM REIT, the Manager of Tower Real Estate Investment Trust (“**Tower REIT**”), commits to conducting business ethically in compliance with the Malaysian Anti-Corruption Commission Act 2009 and all applicable anti-bribery and corruption laws in which GLM REIT and Tower REIT operates.

GLM REIT does not condone any form of bribery and corruption. This Anti-Bribery Corruption Policy (“**ABC Policy**”), which must be read in conjunction with GLM REIT’s Code of Conduct, serves to provide guidance on how to prevent, deal with and combat bribery and corrupt activities and issues that may arise in the course of business.

Who does this Policy apply to?

This ABC Policy applies to all employees, directors (executive and non-executive) and any person who performs services for or on behalf of GLM REIT and Tower REIT, which includes contractors, subcontractors, consultants, suppliers, agents, intermediaries and representatives of GLM REIT and Tower REIT (collectively, “**Applicable Persons**”).

What must you NOT do?

Anti-bribery and corruption laws make it illegal for any person to:

- (a) corruptly give, promise or offer to give to any person, whether for the benefit of that person or of another person; or
- (b) corruptly solicit, receive or agrees to receive for himself or for any other person,

any gratification as an inducement, reward or otherwise on account of any person or any officer of a public body to do or forbear from doing anything in respect of any matter or transaction, actual, proposed or likely to take place.

Accordingly, you shall not at any time:

- Carry out, offer, promise or agree to give *anything of value directly or indirectly* in order to obtain or retain any personal or business advantage.
- Request or accept *anything of value* that might influence your objectivity in carrying out your employment/business.

“Things of value” that could be perceived as bribery or corruption can take many forms (including monetary, services, donation, employment, discounts or in kind).

As described above, the laws on anti-bribery and corruption are very wide.

For example, Mr. X is an employee in the Leasing Department of XYZ REIT Company and is charged with an offence for making improper payments to an official. Mr. X will be held liable if:

- *Carried out, offered, promised or agreed.* Mr. X made such improper payments, or merely offered to make such payment even though such payment was subsequently not made; it is enough that the payment was offered.
- *Directly or indirectly.* The improper payment was made by him directly to the official or through a third party agent.

The above is only an example to emphasise that a mere offer or a bribe made through a third party is sufficient to constitute a breach of the anti-bribery and corruption laws.

There is no difference whether the bribery or corruption activity is carried out within or from Malaysia, or otherwise.

What are the penalties?

Engagement in any bribery or corrupt practices or activities will result in severe negative consequences. The Applicable Person may face disciplinary actions by the employer and prosecutions by the relevant authorities which may include fines and imprisonment up to 20 years.

What else should you do?

All Applicable Persons are responsible for refraining from and preventing any instance of bribery or corruption, and for reporting any concern or suspicion so that GLM REIT can identify the risks and conduct investigations as may be necessary. Reports of any concern or suspicion may be made to the Chairman of the Board Audit & Risk Management Committee of GLM REIT:

Chairman of the Board Audit & Risk Management Committee
GLM REIT Management Sdn Bhd
Level 10, Wisma Hong Leong
18 Jalan Perak
50450 Kuala Lumpur, Malaysia
Email: barmcrichtairman@guocoland.com

If you have any doubt, you should contact the Chairman of the Board Audit & Risk Management Committee immediately.

An electronic version of this ABC Policy is available at <http://www.tower-reit.com.my/>.