
SUNWAY

REIT

DONATIONS, SPONSORSHIPS AND CORPORATE RESPONSIBILITY POLICY

Version 3 (2025)

Process Owner: Sustainability Department

Intended Users: Sunway REIT

Process / Knowledge Area: Policy Statement

Last Updated: 12 August 2025

COMMITTED TO
**SUSTAINABLE
DEVELOPMENT GOALS**



The Board of Sunway REIT endorses the policy, and it is effective on 12 August 2025

CONTENTS

1.	INTRODUCTION	3
2.	OBJECTIVES.....	3
3.	PURPOSE.....	3
4.	SCOPE.....	4
5.	DEFINITIONS.....	5
6.	LIMITS OF AUTHORITY (LOA).....	5
7.	CORPORATE RESPONSIBILITY.....	6
8.	IMPLEMENTATION	7
9.	INDEX REFERENCES	8

1. INTRODUCTION

- 1.1. Charitable donations and/or contributions and/or sponsorships are usually assessed as high-risk areas for various forms of bribery, money laundering and any other corruption related activities. There should be an adequate control in place to ensure that all such payments for donations, contributions or sponsorships are made in full compliance with applicable laws and regulations, together with Sunway REIT's Anti-Bribery and Corruption and Anti-Money Laundering policies.
- 1.2. Therefore, the purpose of this policy is to establish proper controls, including approval thresholds and counter-signatures, to counter the risk of kickbacks.

2. OBJECTIVES

- 2.1. In fulfilling its corporate citizenship, Sunway REIT manages its businesses ethically in accordance with its Code of Conduct & Business Ethics, and positively contributes to social good, and to programmes, which benefit its customers, employees, shareholders and other stakeholders.
- 2.2. Donations and/or cash contributions by Sunway REIT are part of its Corporate Responsibility ("CR") efforts, which are undertaken to meet one or all of the following objectives:
 - a) Garner positive and/or favourable support of its stakeholders as well as serve their expectations and/or needs;
 - b) Contribute resources - people, money, products and services - to support the communities in which it operates;
 - c) Support the national agenda by supporting key propellers of growth to include overall capacity, skills, ICT infrastructure and capabilities, and talent development;
 - d) Ensure all donations and/or cash contributions are allowed by applicable bylaws of Malaysia;
 - e) Be made to established entities having an adequate organisational structure to guarantee proper administration of the funds; or
 - f) Strictly prohibited to use as a means to cover up an undue payment or bribery.

3. PURPOSE

- 3.1. This section encompasses the principle regarding donations and contributions within Sunway Real Estate Investment Trust ("Trust") and Sunway REIT Management Sdn Bhd ("The Manager (CEO & CFO)") (collectively known as "Sunway REIT"). As a responsible corporate citizen, Sunway REIT is committed to contributing to the wellbeing of the community where it operates. It is however important that all donations and sponsorships

are made in accordance with Sunway REIT's policies and receive prior authorisation from the Manager or Sunway REIT's Sustainability Committee ("SC").

- 3.2. Be it through monetary contributions or in-kind, Sunway REIT has always worked towards benefiting the community.
- 3.3. Sunway REIT's SC plays an important role in organising these donations or sponsorship to various Non-Governmental and Government Organisations. Sunway REIT strongly believes that donations or sponsorships made to these organisations are worthwhile because Sunway REIT seeks to:
 - a) Improve the lives of the community in which it serves
 - b) Build good relationships and rapport with members of the community
 - c) Position Sunway REIT as a good corporate citizen in the eyes of the community as well as the government

4. SCOPE

- 4.1. This policy covers all donations of cash, services or donations in-kind, to individuals, non-for-profit organisations and non-governmental organisation ("NGO") or other bodies, but excluded scholarships under the Education division.
- 4.2. All donations, sponsorships and contributions activities referred to in this Policy must comply with the principles laid out in the Anti-Bribery and Corruption Policy and the Anti-Money Laundering Policy of Sunway REIT.
- 4.3. Policy on Donation and Contributions
 - a) Ad-hoc donations or charity contributions in cash and kind can be considered by Sunway REIT within acceptable limits of authority and disbursement; but only to support institutions, platforms and individuals undertaking community or stakeholder initiatives in the area of Community Enrichment. All requests for donations and contribution must be channelled through Sunway REIT's SC, the Manager and GBMC. For amount exceeding the approval limit by the Manager and Sunway REIT's SC, it shall be escalated to the BOD for their decision.
- 4.4. Exception of this policy can be taken within the prescribed limit on the amount of funds and subject to:
 - a) Special considerations due to out-of-scope requests from Government authorities, related agencies or members of the royal families.
 - b) Sunway REIT does not make donations for political causes or any politically affiliated institutions. However, to meet the obligatory requirements as a corporate citizen, Sunway REIT does contribute to events organised by political parties especially those

concerning industry/policy issues with key regulatory bodies, with private sector involvement. The donations will be in-kind and not in cash.

- c) Donation request by politicians will not be approved unless if it is for a good cause championed by the politicians. The donations will be in-kind and not in cash; directly provided to the recipients or beneficiaries and not through the politicians.

5. DEFINITIONS

5.1. “Non-Governmental Organisation” or NGO is defined as an organisation in Malaysia which is not operated or conducted primarily for profit and is:

- a) A hospital;
- b) A public or benevolent institution/organisation;
- c) A university or other educational institution;
- d) A public authority or society engaged solely in research or other work connected with the causes, prevention or cure of disease in human beings;
- e) A Government - assisted institution engaged in socio - economic research;
- f) A technical or vocational training institution; or
- g) A society registered with the Registrar of Societies.

6. LIMITS OF AUTHORITY (LOA)

Amount	Approving authority
Up to RM50,000	The Manager (CEO and CFO)
Above RM50,000	Sunway REIT’s SC to review and provide recommendation to BOD

6.1. Sunway REIT must exercise prudence when evaluating and approving charitable donations. The limits of authority (“LOA”), as defined in the policy document, of approving authority should be adhered to at all times.

LOA Explanatory Notes:

LOA has been kept at two tiers for simplification purposes and ease of process.

- a) As defined in the table, the approval authority can exercise his and/or her LOA according to the budget allocated for this purpose in a year.

- b) For any request, the donation can be made or granted in either cash, in-kind or both provided that the amount is within the approver's limit and budget and made under one single request only.
- c) The above LOA for approval is strictly for donations, contributions and/or sponsorships and not for business related activities. CR related requests should be centralised at Sunway REIT's SC, the Manager and GBMC based on the authorised threshold limit.

7. CORPORATE RESPONSIBILITY

Community Programmes

- 7.1. As part of Sunway REIT's commitment to corporate responsibility and development, as a general principal, Sunway REIT provides such assistance in appropriate circumstances and in an appropriate manner. However, such requests must be carefully examined for legitimacy and not be made to improperly influence a business outcome.
- 7.2. The proposed recipient of assistance must be a legitimate organisation and appropriate due diligence must be conducted. Even requests determined to be legitimate must be carefully structured to ensure that the benefits reach their intended recipients. If the Manager's employees are in doubt as to whether a charitable contribution or social benefit is appropriate, consult GBMC for assistance.
- 7.3. Proposals for community programmes must be submitted to and approved by Sunway REIT's SC, the Manager and GBMC based on the approval limits.
- 7.4. Sunway REIT's SC, the Manager and GBMC will ensure that all programmes adhere to Sunway REIT's CR framework for purpose of Community Enrichment.
- 7.5. All CR programmes must take into account the following key factors:
 - a) Sustainability: Sunway REIT's CR goals are long term and not subject to frequent change.
 - b) Focus: CR key deliverables should ride on Sunway REIT's existing strength, competencies and infrastructure to strengthen and enhance its position in the market and / or communities that Sunway REIT built / locations that Sunway REIT has presence.
 - c) Participation: Employee involvement is a cornerstone of Sunway REIT's CR initiatives. All community programmes should encourage employee participation, generate teamwork and instil a sense of responsibility amongst staff towards the various communities that they serve.

- d) Support: It is important that all CR programmes and messages enhance Sunway REIT's corporate image and not deflect from its overall positioning. They should incorporate Sunway REIT brand values.
- 7.6. Sunway REIT requires the Manager's employees to use good judgement in assessing the requests for donations, contributions and sponsorships. When in doubt as to whether a charitable contribution or social benefit is appropriate, the Manager's employees should seek further advice from GBMC for assistance.
- 7.7. The Manager's employees must ensure that all donations and sponsorships are not used as a subterfuge for bribery or used to circumvent or avoid any of the provisions of Sunway REIT's Code of Conduct and Business Ethics including in particular the prohibition of bribery.
- 7.8. The Manager's employees need to be certain that donations to local or foreign-based charities or beneficiaries are not disguised illegal payments or bribes to government officials, and must ensure that the charity does not act as a conduit to fund illegal activities in violation of international anti-money laundering, anti-terrorism and other applicable laws.

8. IMPLEMENTATION

- 8.1. The strategy of making donations and sponsorships, guidance on the conduct of due diligence on all proposed recipients and the approval / declining process of all donations, sponsorships and contributions shall follow Sunway REIT's Standard Operating Procedure on Donation, Sponsorships and Corporate Responsibility.

9. INDEX REFERENCES

Short Form	Full Text
CEO	Chief Executive Office
CFO	Chief Finance Officer
SC	Sustainability Committee
GBMC	Group Brands Marketing and Communications
BOD	Board of Directors
CR	Corporate Responsibility