CORPORATE GOVERNANCE

Good governance practices represent a critical benchmark in determining an organisation's success and management stability. Our Boards form the pillars of a robust corporate governance framework in setting the tone from the top and establishing a corporate culture of ethical conduct within the Group guided by the Code of Conduct and Business Ethics (CoBE).

SUSTAINABLE MATTERS

Supporting the UNSDGs

Corporate Governance and Business Ethics

Risk Management

WHY IT MATTERS

- Our reputation and Shareholders' trust and confidence in us is imperative to our future growth and attainment of long-term goals
- Building a culture of trust and accountability sets an organisation up for success
- Increased agility for our organisation to deliver on its purpose and goals

VALUES CREATED

- Integrity and ethical practices amongst management, employees, business partners and stakeholders
- Sustainable financial performance delivering long-term values and returns to our holders of Stapled Securities
- Accountability on control systems which commensurate with the risks involved

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KLCCP Stapled Group is subject to corporate governance requirements set out by the Main Market Listing Requirements (MMLR) of Bursa Malaysia Securities Berhad and best practices as stipulated by the Malaysian Code of Corporate Governance ("MCCG") issued by the Securities Commission Malaysia.

With greater accountability and transparency, KLCCP Stapled Group strives to strengthen its corporate governance, anchoring it to its organisational culture and aligning it to our shared values that will ultimately secure the confidence and support of the Group's holders of Stapled Securities.

OUR APPROACH

KLCCP Stapled Group takes a proactive approach in observing high standards of corporate conduct with good corporate governance policies and practices in ensuring the sustainability of the organisation and safeguarding the interests of the holders of Stapled Securities and maximising long-term stakeholder value.

Our commitment to good corporate governance is reflected in the CoBE which guides the organisation in fulfilling its business obligations with utmost integrity and transparency. Our commitment in driving the culture of openness, transparency and accountability are reflected through our adoption of the "No Gift Policy" and Whistleblowing Policy and our adherence to the Anti-Bribery and Corruption Policy and Guidelines (ABC) Manual.

Overseeing the overall strategic and operational business performance are KLCCP's and KLCCRM's Board of Directors. The Board Governance and Risk Committee as well as the Board Audit Committee were established to assist the Boards in discharging its functions in relation to internal controls, risk management, compliance with applicable laws and regulations, as well as reviewing internal policies and procedures. Together, they are entrusted to further fortify the levels of accountability and integrity in KLCCP Stapled Group.

3-Year (2016-2018) Sustainability Roadmap

3-YEAR TARGET (against 2015 baseline)	STATUS	RESULTS
Women on Board to achieve 30%	● ○ ○	Achieved 37.5% women on Board

● ○ ○ Met 2018 target   ○ ○ ● 2018 target not met

CORPORATE GOVERNANCE AND COMPLIANCE

Our Boards take pride and places importance on strong governance culture and implementing international best practices across the business segments. In conducting our business operations, we are guided by the KLCC Shared Values to uphold integrity in fulfilling our obligations in an ethical, responsible and transparent manner. We strictly conform to the respective laws, rules and regulations in the country where we operate.

Our Board Charter incorporates elements of sustainability with the Boards recognising the responsibilities to our stakeholders and acknowledging that the organisation should play an important role in contributing towards the welfare of the community in which it operates. The Boards also acknowledge the need to safeguard and minimise the impact to the environment in achieving KLCCP Stapled Group's objectives. The Boards' agenda reflects commitment to economic support for longer term sustainability with a focus on the positive impact on the environment, community and society.

During the year, KLCCP Stapled Group was recognised for demonstrating good corporate governance practices and was awarded the Gold Award under the category, The Best Governed and Transparent Company at the 10th Annual Global CSR Summit and Awards 2018 and The Global Good Governance Awards and Summit 2018 in recognition of its effort in practicing a culture of openness and transparency across all levels of the organisation while implying a high degree of ethics in the marketplace.

Board Composition and Diversity

The Boards are responsible for overseeing the overall management of KLCCP and KLCCRM and responsible for providing oversight and stewardship of the organisation. Harnessing strength from a variety of backgrounds and experiences, the Boards bring diversity and add depth to deliberations.

KLCCP and KLCCRM Boards of Directors comprise eight members respectively, one of whom is a Chief Executive Officer, three Independent Non-Executive Directors, in compliance with the requirement of the MMLR on independence, while the remaining four Non-Executive Directors are Non-Independent Directors. Currently, there are three female directors on each Board which accounts for 37.5% women representation on board.

COMPOSITION OF THE BOARD

1 Chief Executive Officer

3 Independent Non-Executive Directors

4 Non-Independent Non-Executive Directors
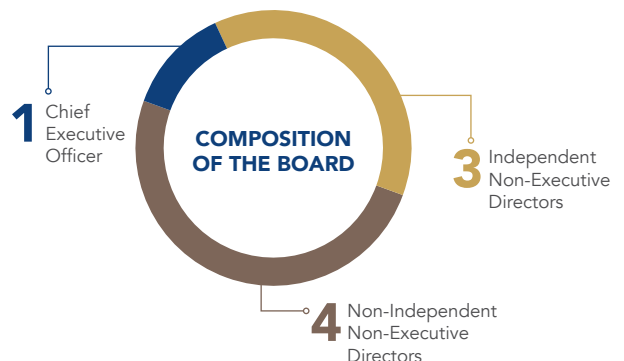
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MCCG recommended for the formulation and disclosure of gender diversity policies and targets to be mandatory, where companies must disclose in their Annual Reports policies and targets with respect to composition of women on their boards. The Group's Diversity Policy, which was rolled out in August 2016, aspires to ensure a diverse and inclusive board that will leverage on differences in thoughts, perspectives, knowledge, skills, regional and industry experiences, cultural and geographical background, age, ethnicity and gender to achieve effective stewardship and management which lead to its competitive advantage. The representation of women on Boards surpassed the country's aspirational target of 30% whilst maintaining an optimum mix of skills, knowledge and experience of the Boards underpinned by meritocracy.

Separate Non-Executive Chairman and CEO

The positions of the Chairman and the CEO of KLCCP and KLCCRM are held by two different individuals. The Chairman, a Non-Independent and Non-Executive Director of the Company and KLCCRM, is primarily responsible for the orderly conduct and functions of the Boards whilst the CEO has delegated authority from, and is accountable to the Boards in managing the Group's businesses, organisational effectiveness and implementation of strategies and policies.

Sustainability Governance

Our Board Charter incorporates elements of sustainability with the Boards recognising the responsibilities to our stakeholders and acknowledging that the organisation should play an important role in contributing towards the welfare of the community in which it operates. The Boards also acknowledge the need to safeguard and minimise the impact to the environment in achieving KLCCP Stapled Group's objectives. The Boards' agenda reflects commitment to economic support for longer term sustainability with a focus on the positive impact on the environment, community and society.

KLCCP Stapled Group is working towards strengthening sustainability governance practices across the Group. Our Boards acknowledge that given the emerging trends of EES risks and opportunities affecting business value and share prices, incorporating sustainability considerations into the workings of an organisation leads to value creation for its business and stakeholders in the longer run.

Financial Transparency, Cost of Fines, Penalties or Settlement in relation to Corruption

In providing timely, transparent, comprehensive and up-to-date disclosures of KLCCP Stapled Group's overall performance, the Boards ensures that a balanced, clear and meaningful assessment of the financial position and prospects of the Group are presented in all the disclosures made to the holders of Stapled Securities, potential investors and the regulatory authorities through various announcements on quarterly financial results, annual reports and press releases, which are made available in Bursa's website and our corporate website.

The Management of KLCCP and KLCCRM also conducted financial performance briefing for the investor community and issued press statements in conjunction with the announcements of the quarterly results of KLCCP Stapled Group. All corporate disclosures take into account the prevailing legislative restrictions and requirements as well as investors' need for timely release of price-sensitive information such as the financial performance results, material disposals/acquisitions, and significant corporate proposals. In all circumstances, KLCCP and KLCCRM are conscious of the timeliness in providing material information about KLCCP Stapled Group and continually stress the importance of timely and equal dissemination of information to stakeholders.

During the financial year, there was no public sanction or penalty imposed by the relevant regulatory bodies on the management company of KLCC REIT.

Boards Training and Engagement

The relevant development and training programmes are recommended to the Directors with assistance from Company Secretary according to Director's individual needs to keep abreast of business and regulatory development and to enhance their ability in discharging their duties and responsibilities. The relevant development and training programmes attended by Directors have during the year under review were reported in the CG Statement of the Group's Annual Report.

As provided in the Board Charter and in line with MCCG, the Company Secretary also facilitates with the induction programme for newly-appointed Directors.

Appointment, Re-appointment and Re-election of Directors

The appointment, re-appointment and re-election of Directors are governed by the Companies Act 2016, MMLR, REIT Guidelines and other applicable rules and regulations. Both Constitutions of KLCCP and KLCCRM provide that at every AGM at least one third of all Directors for the time being and for those appointed during the financial year shall retire from office but shall be eligible for re-election in line with the MMLR.

Remuneration for Senior Management

Remuneration of senior management is based on the approved remuneration policy by the Boards and benchmarked against the industry practice. Benchmarking exercise is conducted on an annual basis with information from independent external party. The senior management are also remunerated based on performance.

Appointment of senior management is based on merit and performance as well as undergoing leadership assessment based on the Group's leadership competency model to ensure their fitness to the position.

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Matters relating to remuneration for the Directors and Senior Management are reviewed by the NRCs and, where relevant, recommended to the Boards. The NRCs established formal and transparent remuneration policy for adoption by the Boards.

Audit Committee and Rotation of Auditor

Audit Committees of KLCCP and KLCCRM comprise three independent members, two of whom are accounting graduates and have vast working experience in audit, finance and business advisory services. Puan Farina Farikhullah Khan is a Fellow member of the Institute of Chartered Accountants in Australia and Cik Habibah Abdul is a member of the Institute of Chartered Accountants of England and Wales, a Member of Malaysian Institute of Certified Public Accountants as well as Malaysian Institute of Accountants.

In line with the best practices stipulated by MCCG, the Boards have obtained written assurance from the external auditors on their independence in discharging their duties throughout the conduct of the audit engagement annually in Audited Financial Statement. The respective Terms of Reference of the Audit Committees includes the policy that requires a former key audit engagement partner of the Company's external auditors firm to observe a cooling-off period of at least two years before he or she could be appointed as a member of the Committee. With this in effect, the last rotation and appointment of our audit partner, Ernst & Young, was done in 2017.

BUSINESS ETHICS AND INTEGRITY

The Board of Directors of KLCCP and KLCCRM are guided by the corporate governance principles, CoBE and charters for each board committee and is committed to representing the long-term interests of all holders of Stapled Securities.

KLCCP Stapled Group's commitment to good corporate governance is reflected through its effort in promoting compliance, integrity and transparency through the adoption of KLCCP Stapled Group's Shared Values, PETRONAS' CoBE, ABC, No Gift Policy and Whistleblowing Policy.

	EMPLOYEES	SUPPLY CHAIN
Communication Channels	• KLCCP Shared Values • PETRONAS Code of Conduct and Business Ethics • PETRONAS Anti-Bribery and Corruption Manual • No Gift Policy • Gift Register • Asset Declaration • PETRONAS Integrity Compliance Framework • PETRONAS Whistleblowing Policy • Induction Trainings	• Imposed provision in all contracts requiring third parties to comply with CoBE • Imposed provision of Anti-Bribery and Corruption clauses in all contracts requiring third parties to comply with • Continuous engagement with third parties to ensure compliance with CoBE and ABC Manual
Feedback Channels	• Whistleblowing Reporting Platform	

Code of Business Ethics

At KLCCP Stapled Group, we adhere to the PETRONAS' CoBE which contains detailed policy statements on the standards of behavior and ethical conduct expected of each individual. The CoBE which was rolled out to the KLCC Group in 2012, serves as a guiding principle on how every employee, management and directors are expected to conduct his or her work. The CoBE applies to all employees and directors within the KLCCP Stapled Group and we continue to pursue good business ethics amongst the employees and stakeholders and endeavour to achieve the highest standards of integrity through the adherence to the CoBE.

The CoBE is benchmarked to international standards and outlines the behaviour and ethical conduct expected of employees, directors and other stakeholders in the way we do business which is reflected by the policies and procedures which deals with confidentiality, conduct and work discipline and corporate gifts and workplace harassment. It not only promotes legal and procedural compliance, but also provides guidance to ensure individual behavior is in line with the KLCC Shared Values.

For the year under review, KLCCP Stapled Group continued to communicate the CoBE to all employees as well as third parties performing work for or on behalf of KLCCP Stapled Group through its corporate website, meetings, corporate events and inclusion of CoBE in all new employees' induction program. During the year, 74 new employees were introduced to the CoBE and were required to sign a declaration of adherence to the CoBE.

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Anti-Bribery and Corruption

The ABC Manual and the No Gift Policy, as adopted from PETRONAS has been KLCCP Stapled Group's reference in dealing with unethical conduct and is now part of the culture in our efforts to eliminate all forms of bribery and corruption within the organisation. The ABC Manual was developed to supplement the general policy statements set out in the CoBE on fighting corruption and unethical practices and outlines detailed explanation on procedures for dealing with improper solicitation, bribery and corruption and addressing of ethical issues. Our Human Resource also rolled out the Anti-Bribery and Corruption Policy and Guidelines as part of our continuous effort in creating greater awareness on integrity as prescribed in the ABC Manual.

KLCCP Stapled Group's strong stance of zero-tolerance against bribery and corruption extends to its business dealings with third-party service providers and vendors. Pursuant to the ABC Manual, KLCCP Stapled Group requires that its agreements with third-party service providers and vendors incorporate anti-bribery and anti-corruption provisions. In line with this commitment, every reported case has been dealt with meticulously, with all fairness and according to lawful practices. During the year, we have had one case reported and investigated and the employee is no longer assigned to KLCCP Stapled Group.

To further strengthen our efforts in promoting ethical practices across the organisation, KLCCP Stapled Group continued to communicate and engage with employees at all levels through displays of posters at all office sites as well as conducted talks on integrity to uphold the core values and not engage in corrupt or unethical practices. During the year, we put emphasis on the anti-bribery and corruption with the rollout of the ABC Manual across all employees of the Group. This serves as a reminder to all employees to maintain the highest standards of integrity at work and in all business dealings

Assets Declaration and Gift Register

The KLCC Group's Assets Declaration and Gift Register which was launched in December 2017 has been put in force during the year where employees declared their assets to the organisation through the Human Resource Division via sealed envelopes to ensure confidentiality. This Assets Declaration is for the Group to ensure management and employees do not abuse their power for personal gain or acquire assets through unlawful means or dealings. This Assets Declaration will be a means to anchor the issue of ethics and integrity within the Group.

KLCC Group also subscribes to the *No Gift Policy* which we have implemented since 2012. Under this policy, employees are prohibited to give or receive gifts of any kind from any parties it has dealings with. With the launch of the Gift Register and in accordance to the *No Gift Policy*, all gifts received by employees would need to be registered and returned to the sender to ensure adherence to this policy.

Whistleblowing Policy

The KLCCP Stapled Group adopts a zero tolerance policy against all forms of bribery and corruption. The Whistleblowing Policy facilitates as a communication and feedback channel for employees to report on any misconduct within the organisation. This reflects our commitment and strong stance against any misconduct within the Group. The Whistleblowing Policy, as adopted from PETRONAS provides an avenue for employees and members of the public to disclose any misconduct or malpractices within KLCCP Stapled Group. It encourages openness and transparency and heightens ethical business conduct and provides trusted and accessible channels to report corruption, fraud and dishonest practices at the workplace.

Employees and members of the public who raise or disclose any malpractices can do so without doubt or fear of reprisals as the whistleblower is assured confidentiality of identity, to the extent reasonably practicable, even post completion of investigation, so long as the disclosure is made in good faith. Whistleblowers are also kept updated on outcomes of the disclosure made, adhering to procedures in place.

As part of the PETRONAS Group, all reported whistleblowing incidents are escalated to the PETRONAS Whistleblowing Committee set up to deliberate upon the disclosures made, determine next course of action and monitor progress until case closure. The Committee meets at least once a month and provides updates to the Internal Audit Management Committee as well as Board Audit Committee.

The organisation's ongoing efforts to promote the Whistleblowing Policy and its established platforms entailed displaying communication collateral at strategic locations within KLCCP Stapled Group's office premises such as at the PETRONAS Twin Towers, Menara 3 PETRONAS and Menara Dayabumi.

> Our Whistleblowing Policy is available at
> http://www.klcc.com.my/sustainability/governance.php

Dealings in Stapled Securities

KLCCP Stapled Group adopts the Dealings in Stapled Securities policy, a Memorandum of Insider Trading, for Directors and employees which advocates best practices pursuant to the MMLR. It sets out prohibitions against dealing in the Stapled Securities when in possession of unpublished price sensitive information and knowledge of facts or materials. The directors are issued guidelines and are notified in advance of the closed period for trading in Stapled Securities and are regularly reminded of the laws of insider trading and to refrain from dealing in Stapled Securities on short-term basis.

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RISK MANAGEMENT

Risk management is an integral part of KLCCP Stapled Group's business at both strategic and operational levels. An effective and sound risk management system is important for KLCCP Stapled Group to achieve its business strategies and objectives. KLCCP Stapled Group has an established KLCC Group Enterprise Risk Management Governance Framework which outlines the risk policy, risk governance and structure, risk measurement and risk operations and system.

The Risk Management Oversight Structure which consists of the Boards, Audit Committees, Management Committee and Risk Management Committee (RMC) sets out the structure used to assign responsibility for risk management and facilitates the process for assessing and communicating risk issues from operational levels to the Boards.

KLCCP and KLCCRM Boards developed an integrated robust risk management system for business resiliency focusing on three key areas.

Enterprise Risk Management

KLCCP Stapled Groups' Enterprise Risk Management (ERM) Framework is a structured and holistic approach to identify, assess, treat and monitor risk aimed to reduce the likelihood and impact of all identified risks to enhance ability to achieve strategic objectives. It sets out the six key elements comprising Governance, Context Setting, Risk Assessment, Risk Treatment, Risk Monitoring and Review and Continual Improvement which enable KLCCP Stapled Group to manage risks in an integrated, systematic and consistent manner.

The framework provides a standard and consistent approach across KLCCP Stapled Group in achieving the following key attributes in risk management:
- Full accountability in managing risks at respective entity
- Application of risk management in decision making
- Continuous communication with external and internal stakeholders, including comprehensive and frequent reporting on risk management performance
- Risk management as part of KLCCP Stapled Group's management processes and culture in achieving the organisation's objective.

This is to provide a balanced view for informed decision making through richer risk conversations and considerations of risk reward trade-off. Risk assessment is carried out prior to any decision point using the risk assessment guideline which is aligned to ISO 31000.

Annually, the Group Enterprise Risk Management Department facilitates and coordinates the Group-wide Risk Profiling exercise that requires business and corporate executive leaders to proactively identify, assess and document material risks and the corresponding key controls and mitigating measures needed to address them. Material risks and their associated controls are consolidated and reviewed at KLCCP Stapled Group level before they are presented to the Risk Committee, Audit Committee and the KLCCP and KLCCRM Boards.

KLCCP Stapled Group utilises the INTERISK system as a risk tool to effectively manage and monitor risk profiles. It embeds the industry standard risk management process of ISO 31000. The INTERISK system drives active risk conversations and analysis monitoring through a dashboard, reinforces effective risk governance and assurance practices and provides a seamless flow of information and processes along the risk management value chain.

Crisis Management

A comprehensive set of processes aimed to prepare the organisation to respond and manage crisis in the risk areas to protect and save people, environment, assets and reputation.

A Crisis Management Plan (CMP) is in place to address and respond to incidents where risk mitigation fails or when full prevention of the risk occurring in unlikely. This includes the emergency response, emergency management and crisis management.

During the year, KLCCP Stapled Group conducted fire drill and evacuation exercises for tenants at PETRONAS Twin Towers, Menara 3 PETRONAS and Menara Dayabumi to test the effectiveness and robustness of the Crisis Management Plan. Briefing on Fire and Life Safety, on boarding program for new tenants and demonstration on Fire Extinguisher were amongst the fire safety program conducted for tenants to promote awareness of the dangers of fire hazards, prevention, guidance on effective operation of the fire extinguishers and carry out emergency evacuation procedures within workplace.

At MOKL Hotel, the Crisis Management Team members have responsibility with reference to their sections based on time sequence and direct responsibilities. The Hotel Manager and General Manager chair monthly meetings to outline simulation schedules and participate in the simulations. The local police authorities work with the hotel during the simulations to reflect a "real time authentic" scenario. Our hotel staff are trained yearly on the Business Continuity Management Plans and simulations are held yearly to ensure that we are prepared for any eventualities.

Business Continuity Management

A Business Continuity Plan (BCP) for KLCCP Stapled Group was established to cover the failure of ICT, business supply chain, assets and people. The BCP aims to provide guidance in resuming key business functions in the event the CMP fails to contain the incident and it escalates into a prolonged disaster that has a major or catastrophic impact on the business in terms of financial, operation and reputation.

During the year, the review of BCP on business impact analysis (BIA) was carried out to ensure the critical business functions are identified, assessment of the impact of unavailability of the functions over time, set prioritised timeframes for resuming these functions and specified Minimum Resources Requirements (e.g. as people, equipment, assets, facilities, technology, vital record, interdependencies) to be allocated to recover and resume these functions following prolonged business disruption. The BIA was conducted for all Business Units (BU) and Operating Units (OPUs) in compliance to BCM framework to review the BCP annually. The updated of BIA and BCP was presented to RMC and subsequently the updated BCP approved by GCEO.
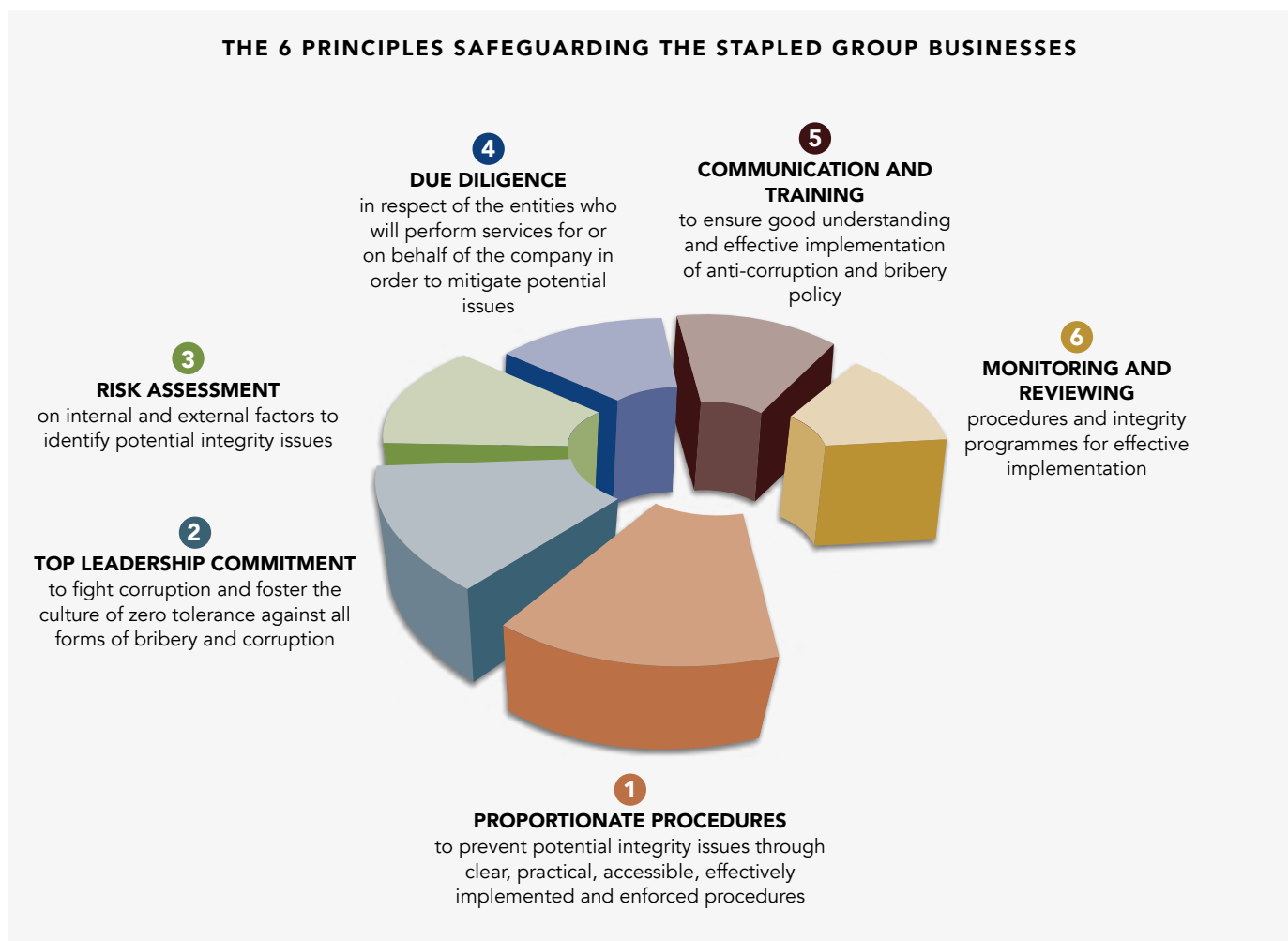
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BCP simulation exercise comprising testing of BCP for specific identified scenario was carried out to ensure practicality of the BCP for its implementation and preparedness of the Critical Business Function staff during crisis. The BCP simulation exercise includes testing of the recovery strategy at virtual office and the effectiveness of identified Primary and Alternate Workforce for business resumption of the Critical Business Function. During the year, the critical business function tested was from the Strategy, Finance and Investor Relations Division including the Information Technology team.

At MOKL Hotel, BCP is demonstrated in an organisational chart that outlines the Crisis Management Team, Emergency Response Team and Business Recovery Team who are responsible in dealing with incidents and crisis related to hotel operations. Senior leadership and other department heads are part of this organisation led by the Deputy Crisis Management team member and Crisis Management Leader conducted over 24 yearly Emergency Response Plan scenarios and simulations involving hotel leadership and staff participation to increase the hotels readiness. All simulations are documented and then audited by senior leadership and independent auditor yearly.

Integrity Action Plan

KLCCP Stapled Group's Integrity Action Plan guides us in managing integrity risk within the organisation as well as those whom we conduct business with. It reflects our commitment to do business with integrity and to support the Group's zero tolerance against all forms of bribery and corruption.

THE 6 PRINCIPLES SAFEGUARDING THE STAPLED GROUP BUSINESSES

4 DUE DILIGENCE
in respect of the entities who will perform services for or on behalf of the company in order to mitigate potential issues

5 COMMUNICATION AND TRAINING
to ensure good understanding and effective implementation of anti-corruption and bribery policy

3 RISK ASSESSMENT
on internal and external factors to identify potential integrity issues

6 MONITORING AND REVIEWING
procedures and integrity programmes for effective implementation

2 TOP LEADERSHIP COMMITMENT
to fight corruption and foster the culture of zero tolerance against all forms of bribery and corruption

1 PROPORTIONATE PROCEDURES
to prevent potential integrity issues through clear, practical, accessible, effectively implemented and enforced procedures

The aim of the KLCCP Stapled Group's Integrity Action Plan is to strengthen the existing system and procedures to address the root causes of integrity issues resulting from poor enforcement, weak internal control and acceptance culture. The Integrity Action Plan is also aligned to the requirements governed under ISO 37001 Anti-Bribery Management System.

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During the year, we embarked on several initiatives addressing the integrity risks concerned:

RISK CATEGORY	INITIATIVES
Bribery	• Conducted CoBE and Whistleblowing Act Awareness Programme to all staff and on CoBE and whistleblowing for new recruits through induction programme • Roll Out of Anti-bribery and Corruption (ABC) manual to all staff and stakeholders • Review and improve Standard Operating Procedures (SOP) on Tender Evaluation by incorporating Anti Bribery Due Diligence on contractor's experience and workload • Included anti-bribery assessment for contractor's risk assessment (CORA) for all projects. Currently CORA is carried out on projects valued at RM50 million and above and as and when requested by Tender Committee to avoid giving and accepting bribes • Included notice on good governance/anti bribery at common, public area and easy access platform such as on tender box • Inculcate CoBE culture to business partners e.g. contractors, consultants, service providers, to report on corruption via whistleblower. The Clause on CoBE and whistleblowing are incorporated in the Conditions of Contract • Establishment of separate evaluation team for Technical and Commercial Analysis
False Claim **Misappropriation**	• Reviewed and tighten Procurement, Certification of Work Done, QA/QC and Payment Procedures on pre-award process to deter false/fraudulent claim, falsification of financial statement to qualify for bidding process • Reviewed existing system to facilitate detecting of duplicate invoices to mitigate issues on overpayment
Non-Compliance	• Inclusion of owner's representative in Variation Order (VO) Committee to enforce compliance to standard operating procedures (SOP), administrative procedures, internal controls and governance
Abuse of Power	• Background screening for General Manager's position and above was conducted to deter potential abuse of power or wrongdoings • Declaration of Assets by all staff to facilitate investigation when issues arises