



MEGA SQUARE SDN BHD

CONFLICT OF INTEREST POLICY

MSSB-010 Rev.00.202305

Conflict of Interest Policy

1. Introduction

- a) This Conflict-of-Interest Policy ("Policy") outlines the expectations and obligations of employees of Mega Square Sdn Bhd ("the Company") regarding the disclosure, management, and resolution of conflicts of interest.
- b) The Policy is designed to ensure that employees act in the best interests of the Company and maintain the highest standards of integrity, transparency, and ethical conduct.

2. Definition of Conflict of Interest

- a) A conflict of interest arises when an employee's personal interests, relationships, or activities may interfere, or reasonably appear to interfere, with the employee's objective and unbiased judgment when carrying out their duties for the Company.
- b) Examples of conflicts of interest may include, but are not limited to:
 - I. Financial interests in other organizations that may compete or conflict with the Company's interests.
 - II. Outside employment or business engagements that may affect an employee's ability to fulfill their responsibilities.
 - III. Personal relationships that may influence or compromise an employee's decision-making.
 - IV. Any other type of conflict which could impact the employee's duty or judgement to act in the best interest of Mega Square.

3. Obligation to Disclose

- a) Employees have an ongoing obligation to promptly disclose any actual, potential, or perceived conflicts of interest that arise during the course of their employment.
- b) Employees should disclose conflicts of interest even if they are uncertain about the nature or extent of the conflict.
- c) Disclosure should be made by completing the Company's designated Conflict of Interest Disclosure Form (a template is attached in Appendix A), available from the Human Resources department.

4. Review and Evaluation

- a) The Company will review all disclosed conflicts of interest on a case-by-case basis.
- b) The P&A Manager, the General Manager and the Managing Director will assess each disclosure, considering factors such as the nature of the conflict, potential impact on the Company, and applicable laws and regulations.
- c) The assessment will determine the appropriate course of action to mitigate, manage, or resolve the conflict of interest.

5. Mitigation and Resolution

- a) Based on the assessment, the Company will take appropriate action to address the conflict of interest. This may include:
 - I. Implementing safeguards or restrictions to minimize the impact of the conflict.
 - II. Adjusting roles, responsibilities, or reporting lines to avoid conflicts.
 - III. Requiring recusal from decision-making processes related to the conflict.
 - IV. Terminating or modifying relationships that create conflicts.
- b) The Company will communicate decisions and actions to the relevant employees involved in the conflict of interest.

6. Confidentiality and Protection

- a) The Company will treat all information provided in the disclosure process with strict confidentiality, to the fullest extent permitted by law.
- b) Employees who report conflicts of interest in good faith will be protected against retaliation. Any retaliation will be subject to disciplinary action.

Mega Square Sdn Bhd reserves the right to take appropriate disciplinary action, up to and including termination, for violations of this Policy.

Appendix A**Conflict of Interest Disclosure Form**

Employee Information:

Name:	
Employee No:	
Department/Position:	
Date:	

Nature of Conflict of Interest:

Please briefly describe the conflict of interest, including any personal interests, relationships, or activities that may interfere with your ability to act in the best interest of the Company.

Parties Involved:

Please provide the names and roles of individuals or entities directly involved in the conflict of interest.

Declaration and Certification:

I declare that the information provided in this Conflict-of-Interest Disclosure Form is true and accurate to the best of my knowledge. I understand that it is my responsibility to promptly disclose any conflicts of interest that may arise during my employment.

Employee's Name:	
Employee's Signature:	
Date:	

For office's use:

Decision:	
Actions Taken:	
Date:	
Authorised by:	