

# MY E.G. SERVICES BERHAD

[Registration No. 200001003034 (505639-K)]

# CONFLICT OF INTEREST POLICY

### 1.0 DEFINITIONS

"MYEG" or "the Company" : MY E.G. Services Berhad

[Registration No. 200001003034 (505639-K)]

"MYEG Group" : The Company and its subsidiary, collectively

"Board" : Board of Directors of MYEG

"Companies Act" : The Companies Act, 2016 and any statutory modification,

amendment or re-enactment thereof for the time being in

force.

"Director" : Includes all independent and non-independent directors,

executive and non-executive directors of the Group and

shall also include alternate or substitute directors.

"Key Senior Management" : Includes Managing Director, Executive Directors or any

position having authority or responsibility for planning, directing and controlling the activities of MYEG, directly or

indirectly (C suite level).

"Listing Requirements" : Main Market Listings Requirements of Bursa Malaysia

Securities Berhad including any amendment thereto that

may be made from time to time.

"PDPA" : Personal Data Protection Act 2010 and any statutory

modification, amendment or re-enactment thereof for the

time being in force.

"Policy" : Conflict of Interest Policy

#### 1. Introduction

MYEG Group recognises and is committed to maintaining, observing and practicing high ethical standards of professionalism and integrity at all times in respect of its business and operations.

This policy outlines the disclosure obligations of each Director and Key Senior Management of MYEG Group with respect to conflict of interest, and the procedures to be followed when a conflict of interest arises or potentially arises to ensure systematic identification, disclosure, and management of conflict of interest in an effective and timely manner.

The objective of this policy aims to ensure that conflict of interest is handled appropriately, promoting transparency, foster a culture of honesty and accountability, and good governance within MYEG Group.

### 2. Definitions of Conflict of Interest

A conflict of interest arises when the interest of an individual ("Individual"), such as a Director, or Key Senior Management, interfere or appear to interfere with the interests of MYEG Group. It may also occur when an Individual's interest makes it difficult to perform their roles objectively and effectively.

A potential conflict of interest is a conflict of interest that has not yet materialised but may arise subsequently due to prevailing relationships or interests of an Individual.

A perceived conflict of interest is a conflict which could exist but is not directly tied to any Individual.

Interest in competing business refers to direct or indirect financial interest, non-financial interest (e.g. arising from relationships whether family, business or professional interests), or competing loyalties or interests in a business that competes with the Group.

### 3. Scope

This policy applies to all Directors and Key Senior Management of MYEG. It covers conflict of interest that may arise between their personal interests and the interests of MYEG Group.

The Directors and Key Senior Management of MYEG Group are required to fulfill their responsibilities with professionalism, honesty, and integrity at all times. They should steer clear of any situations where there might be a conflict between their personal interests and those of MYEG Group, whether real, potential, or perceived.

The personal interests shall include but not limited to the interests of family member, i.e. spouse, parent, child (including adopted child or step-child), siblings, spouse of child, siblings of the Directors and Key Senior Management of MYEG Group or any company, corporation owned or controlled by them in which they have substantial personal interest.

This Policy shall be read together with:-

- MYEG's Anti Bribery and Anti-Corruption Policy;
- MYEG's Code of Conduct;
- MYEG's Code of Ethics;
- MYEG's Directors' Fit and Proper Policy;
- MYEG's Directors Assessment Policy; and
- MYEG's Whistle Blowing Policy

## 4. Circumstances which constitute or may give rise to conflict of interest

A conflict of interest may be actual, potential, or perceived and may be financial or non-financial interests arising from relationships (family, business, or professional), or competing loyalties or interests.

Conflict of interest situations may take many forms. Directors and Key Senior Management should be vigilant in identifying situations that may give rise to a conflict of interest.

Examples of situations (non-exhaustive) where a conflict of interest could arise are as follows:

- (a) Where a Director or Key Senior Management is interested in a contract or proposed contract with the Company or MYEG Group.
- (b) Where a Director holds another office or possesses any property where duties or interests are created which may conflict with his duties and interest as a Director.
- (c) Where a Director or Key Senior Management uses the Group's property, information or position for personal gain.
- (d) Where a Director or Key Senior Management takes advantage of any opportunity which may be given to the Group.
- (e) Where a Director or Key Senior Management engages in activities that affect their ability to make decisions in the best interests of the Company or MYEG Group.
- (f) Channelling benefits or resources meant for the Company to a company in which the Director or Key Senior Management has an interest.
- (g) Disclosing trade secrets to competitors when the Director or Key Senior Management has an interest in such competitors.
- (h) Leveraging the Company's business plans for personal gain through private companies.
- (i) Involvement in a business that competes with MYEG Group's products.
- (i) Holding offices or directorships in companies that compete with the Company.

#### 5. Disclosure of Conflict of Interest

- (a) Any Director or Key Senior Management who becomes aware of a conflict of interest must promptly disclose the nature and extent of the conflict to the Company.
- (b) Disclosure should occur as soon as practicable after the relevant facts have come to the knowledge of the individual and should be made on a periodic and regular basis, including at all board meetings.
- (c) The disclosure should include all relevant details, such as the nature of interest (including interest in any competing business with the Group), the relationship or transaction involved and the potential impact on the Company using the prescribed standard forms as set out in **the Appendix A**.
- (d) Where there is any change in the nature and extent of the Director or Key Senior Management's interest subsequent to the disclosure, the Director or Key Senior Management shall make a further disclosure of such changes.
- (e) Any information disclosed under this policy shall be strictly confidential.
- (f) If any Director or Key Senior Management is in doubt whether he or she has a conflict of interest, he or she should access to the advice of the Company Secretary.

### 6. Management of Conflict of Interest

- (a) The Audit Committee shall review and report any conflict of interest situations to the Board, along with the measures taken to resolve, eliminate, or mitigate such conflicts. These disclosures should be included in the Audit Committee Report.
- (b) The Audit Committee's review and disclosure must cover conflict of interest situations that arose or may arise during the financial year, as well as persisting conflict of interest from previous financial years.
- (c) The Board may determine appropriate measures to address conflict of interest, including but not limited to the following:
  - (i) Requiring prompt and periodic declaration of conflict of interest by the Director and Key Senior Management of MYEG Group, including at board meetings and on a regular basis.
  - (ii) Restricting the participation of individuals with conflict of interest in relevant board, committee or general meetings, requiring them to abstain or recuse themselves from deliberation and voting on matters related to the conflicts.
  - (iii) Conducting an assessment of conflict of interest during annual performance appraisal and before new appointments.
  - (iv) Executing non-disclosure or confidentiality agreements to protect confidential and proprietary information or trade secrets.

- (v) Restricting Director and Key Senior Management from participating in businesses that compete with the Company or MYEG Group.
- (vi) In cases where conflict of interest significantly affects the performance of Director or Key Senior Management, requiring them to divest the conflicting interest or consider resigning from MYEG Group. Taking into the account the significance of the conflict of interest and potential ramifications of a failure to handle the conflict properly, the Director should consider whether to inform the Board not to send them board papers relating to the resolution.

### 7. Records Maintenance

- (a) The Company Secretary shall be responsible to record all conflict of interest disclosures by the interested Director(s) and Key Senior Management in the minutes of meeting of the Board or in the board circular resolution as the case may be, at which the declaration was made and to maintain an updated record of such conflict of interest disclosures received.
- (b) These records shall be made available for inspection by auditors or other regulatory authorities upon request.
- (c) The Company will take all reasonable steps to ensure compliance with PDPA in collecting and using the information as part of the assessment process. The information gathered from the assessments shall be strictly for the Board's use for the purposes of the assessment and not for public disclosure.

### 8. Periodic Review

This policy shall be reviewed periodically or as and when necessary by the Board to align the Policy with the applicable laws or regulations enforced at the time being. This Policy shall be made available on the Company's website.

## 9. Breach of Policy

Failure to disclose a conflict of interest, provide complete and accurate information on the conflict or appropriately manage the conflict is a breach of amongst others, this Policy, Listing Requirements, the Companies Act and could result in amongst others, disciplinary action and applicable civil and criminal liability.

This policy was reviewed and approved by the Board on 28 February 2024.

# <u>Disclosure of Conflict of Interest or Potential</u> Conflict of Interest Form

The Main Market Listing Requirements of Bursa Malaysia Securities Berhad requires a listed issuer to disclose the nature and extent of any conflict of interest or potential conflict of interest including interest in competing business involving directors, key senior management and legal representative of a listed corporation. The purpose of this Disclosure Form is to assist the Director/Key Senior Management of MY E.G. Services Berhad ("the Company") in disclosing conflict of interest or potential conflict of interest that arises/may arise.

This declaration applies to all Directors and Key Senior Management of the Company. It covers conflict of interest that may arise between their personal interests and the interests of the Company or its subsidiaries. The personal interests shall include but not limited to the interests of family member, i.e. spouse, parent, child (including adopted child or step-child), or siblings, spouse of child or siblings of the Director and Key Senior Management of the Company or any company, corporation owned or controlled by them in which they have substantial personal interest.

# **Instruction to complete the form**

Kindly indicate with a "

"on the relevant section and complete the information as required. Supporting documents could be appended if required.

# **No Conflict of Interest**

After having read and considered the contents of the Conflict of Interest Policy of the Company, I hereby declare that I am not aware of any conflict of interest (both financial and non-financial) or potential or perceived conflict of interest (both financial and non-financial) including
interest in competing business with the Company and its subsidiaries ("Group").

# **Conflict of Interest (if any)**

I, being a Director/Key Senior Management of the Company do hereby declare on conflict of interest (if any) with the Group as follows (to delete if not applicable):

Date	Property, information or position of	Purpose for the use of property,	Impact to the Group
	the Group which is used	information or position	1
	the Group which is used	information of position	

	I channel benef	its or resources me	eant for the Group for my	personal pu	rpose or business.	
			sources meant for the Group	Purpose for the use of benefits or resources		Impact to the Group
	I leverage on th	e Group's busines	s plans/information for m	y personal p	ourpose or business.	
			ns/information of the being leveraged	Purpose	e for the leveraging of the business plans	Impact to the Group
İ						
	I am involved in the Group.	n a business which	n offers similar products o	or services th	nat are likely to replace or substitut	e the products or services offered by
	Name o	of business	Products or services of the business	•	Nature of involvement* (Director/Shareholder/Others)	Impact to the Group
*For shareholding, kindly state if it is direct or indirect interest and the number of shares held						
	I hold offices, d	lirectorships or sha	ares (whether direct or inc	lirect) in bus	siness which is competing with the	Group.
	Name	of business	Nature of bus	iness	Nature of involvement* (Director/Shareholder/Others)	Impact to the Group
	+F 1 1 1 1	1. 11	is direct or indirect interest			
	1 *For shareholdi	na kundlu stata if it i	ia divect ou indivect interest			

# MY E.G. SERVICES BERHAD

[Registration No. 200001003034 (505639-K)]
Disclosure of Conflict of Interest or Potential Conflict of Interest Form

	Date	Type of finar assistance provided/rece	e	Total amount of financial assistan			Terms and Conditions under normal commercia terms	Impact to the Group
	I possess pro	perty where inte	rests create	ed is in conflict w	ith my duties as a	Director/Ke	y Senior Management of th	e Group.
	Description	on of property	Date	of purchase	Consideration	D	etails of Conflict	Impact to the Group
	I am interest	ed in a contract t	hat the Cre	1				
		ea in a contract t	nat the Gro	oup nas enterea ir	ito.			
		on of contract		e of contract	Consideration	Natu	re of Interest/Details of Conflict	Impact to the Group
						Natu		Impact to the Group
] 	Description	on of contract	Date	e of contract	Consideration			
	I am interest  Description	on of contract	Date	e of contract	Consideration	al RRPT wi	Conflict	

Impact to the Group

I, being a Director/Key Senior Management of the Company do hereby declare my potential or perceived conflict of interest with the Group that has

# MY E.G. SERVICES BERHAD [Registration No. 200001003034 (505639-K)]

Name of Business

Disclosure of Conflict of Interest or Potential Conflict of Interest Form

yet to materialize but may arise as follows (to delete if not applicable):

# **Potential or Perceived Conflict of Interest**

I have Close Relationship\* with another Director/Key Senior Management of the Group / external stakeholder with whom the Group has business relations with (including but not limited to business associates\* of the Group and/or authorities issuing material licences or permits of the Group) / persons who may be a director, major shareholder, partner, or a person with executive power of an entity or organisation involved in competing business with the Group and/or are business associates of the Group. Description of Close Relationship\* Nature of potential / perceived conflict of Impact to the Group interest \* Close Relationship refers to family member of the other person, where "family" shall have the meaning as defined in the Bursa Securities Listing Requirements, i.e.: (a) spouse, (b) parent, (c) child including adopted child and step-child, (d) brother or sister and (e) spouse of persons referred to in (c) and (d). \* Business associates includes associated and affiliated companies of the Group, franchisees, partners, vendors, suppliers, contractors, subcontractors, professionals, consultants, agents, representatives, and others performing work or services for or on behalf of the Group. I have similar business with that of the Group in a geographical location which the Group is not currently operating in but may expand its venture in subsequently.

Nature of business

Geographical location the

business is currently operating in

I am involved in a business which offers similar products or services which the Group is not currently providing, but which may expand its venture in subsequently.							
Name of Business	Products or services offered by the business	Nature of involvement* (Director/Shareholder/Others)	Impact to the Company				
*For shareholding, kindly state if it	is direct or indirect interest and the number	ber of shares held					
I hold offices, directorships or shares in business that which is not currently competing with the Group, but which might be competing with the Group if it expands its venture in subsequently.							
Name of business	Nature of business	Nature of involvement* (Director/Shareholder/Others)	Impact to the Group				
*For shareholding, kindly state if it is direct or indirect interest and the number of shares held							
Any other potential or perceived conflict of interest situation:							

I confirm that the above-mentioned information disclosed is true and correct to the best of my knowledge. Should any conflict of interest situation arises/may arise, I agree to undertake the declaration of the conflict of interest situation to the Board as soon as practicable after the relevant facts have come to my knowledge as well as on a periodic and regular basis including at all board meetings.

Signature	:	
Name	:	
Designation	:	
Date	:	