

# CONFLICT OF INTEREST POLICY



## INTRODUCTION

At FGV Group, we are committed to fostering a workplace culture built on transparency, integrity, and unwavering dedication to the best interests of our organisation. This Conflict of Interest Policy serves as a guiding framework for all Directors, Employees, Advisors and third parties associated with FGV Group. It outlines the principles essential for identifying, disclosing, and appropriately managing conflicts of interest.

Recognising that personal interests and relationships can potentially impact the impartiality of decision-making, this policy establishes a clear foundation for ethical conduct. By adhering to this policy, we reinforce our collective responsibility to maintain the highest standards of integrity and ensure that our actions consistently align with the well-being of FGV Group.

This policy not only outlines our expectations but also emphasizes individual responsibilities in reporting and addressing conflicts of interest promptly. Through this commitment, we aim to uphold the trust placed in us by our stakeholders and cultivate a workplace culture that thrives on ethical conduct and accountability.

### **Interpretation of Conflict of Interest**

Conflict of interest arises when personal interests or relationships compromise the independence of an individual's judgment in fulfilling his/her duties. This includes situations where an individual exploits their role in FGV Group for personal benefit, undermining expected duties of good faith, commitment, diligence, and integrity.

### **Personal Interest Definition**

Personal interest involves "relatives" and "associates," as defined in the Malaysia Anti-Corruption Commission Act 2009. It encompasses family members, close associates, and individuals with specific relationships.

### **Conflict of Interest Situations**

These include financial and personal interests in business dealings with third parties and individuals and any investment activities with FGV Group.

### **Managing Conflict of Interest**

FGV Group integrates conflict of interest prevention into its culture. Individuals are required to disclose conflicts of interest promptly, and the organisation manages these situations appropriately.

**Integrity Pledge (Individual Declaration)**

Individuals shall **Disclose** and **Declare** conflicts of interest and **Discharge** from his/her duties when in conflicted situations. The organisation ensures transparency and accountability in managing these declarations.

**Third Party/Parties Declaration (Integrity Pact)**

Third parties are obligated to declare conflicts of interest per the Group Procurement Policy. The organisation ensures the maintenance of completed declarations and provides copies as needed.

**Individual Responsibility to Declare**

Individuals are responsible for disclosing and declaring conflicts of interest promptly. Failure to comply may result in disciplinary action according to the Code of Business Conduct and Ethics (CoBCE) for Employees, Code of Ethics and Conduct (COEC) and Code of Business Practice (COBP) for Directors.

**Individual Responsibility to Report**

Individuals must report any conflicts of interest they become aware of promptly. This policy aims to uphold transparency, integrity, and the best interests of FGV Group.