



**PROLINTAS MANAGERS  
SDN. BHD.**

202201019689 (1465386-M)

**DECLARATION OF  
CONFLICT OF INTEREST  
POLICY**

**TABLE OF CONTENTS**

<b>ITEMS</b>	<b>CONTENTS</b>	<b>PAGE</b>
1.0	ABBREVIATIONS	3
2.0	DEFINITION	3
3.0	INTRODUCTION	4
4.0	PURPOSE	4
5.0	PROCEDURES	4
6.0	VIOLATIONS	7
7.0	REVIEW AND INSPECTION	7

## 1.0 ABBREVIATIONS

BGRIC	Board Governance, Risk and Integrity Committee
BOD	Board of Directors
CCD	Corporate Communications Division
CEO	Chief Executive Office
CON	Contractors
EREQ	External Requestors
FIN	Finance Division
HCD	Human Capital Division
HOD	Head of Department
HODV	Head of Division
IAD	Internal Audit Department
IGD	Integrity & Governance Department
IO	Investigation Officer
LOA	Limit of Authority
RMCD	Risk Management & Compliance Department
IREQ	Internal Requester
SOP	Standard Operating Procedures
SUPP	Suppliers

## 2.0 DEFINITION

**Interest** is known as a person's stake or involvement in an undertaking, especially a financial one that will arouse prejudicial connection and bring advantage or benefit to a person or group.

**Conflict of Interests** is a situation where the private interest of a company's personnel conflict with the interest of the company.

**Spouse** is a person's partner of marriage in accordance to the law of Malaysia.

**Dependent** is a person who depends on another, especially a family member, for support, aid, or sustenance, especially financial support. This may include spouse(s) as defined above, brothers, sisters, children, grandparents, parents, aunts, uncles, first cousins, nieces, nephews, grandchildren, sons and daughter-in-law, step-brothers, step-sisters, or step-children. The definition also includes "relative" and "associate" as defined by Section 3 of the Malaysian Anti-Corruption Commission Act 2009.

### 3.0 INTRODUCTION

The conflict of interest poses a significant threat to the high integrity standard PMSB upholds. PMSB personnel should avoid any conflict of interest situation or the perception of such conflicts to protect both the company and the personnel's reputation. Personnel are prohibited from misusing their position or authority in the company to pursue their own private interests.

Examples of conflict of interest are described below but they are by no means exhaustive:

- (i) An employee involved in a procurement process is closely related to or has beneficial interest in a vendor being considered by the company;
- (ii) One of the candidates under consideration in a recruitment or promotion exercise is a family member, a relative or a close personal friend of the employee responsible for the exercise; and
- (iii) An employee undertaking part-time work with a contractor whom he or she is responsible for monitoring.

### 4.0 PURPOSE

This policy is to outline a procedure in declaring conflicts of interest, to safeguard against personnel from pursuing their own private interests to the detriment of the company. This is parallel with PMSB commitment in conducting its business fairly, impartially, and in full compliance with all applicable laws and regulations in Malaysia.

This policy is applicable to all PMSB personnel and Board of Directors.

### 5.0 PROCEDURES

#### 5.1 Declaration of Conflict of Interest Policy

##### 5.1.1 POLICY

- (i) All PMSB personnel must declare their conflicts of interest both annually and as soon as they become aware of them, either during a meeting or on an ad- hoc basis;
- (ii) Conflicts may include the interests of spouses, dependents, friends, or other people exercising significant influence on the PMSB personnel;
- (iii) Declaration:
  - (a) Annual Declaration
    - All PMSB personnel must complete and submit the Declaration of Interest Form to the IGD once a year; and
    - New employee shall complete and submit the form within ten (10) working days after joining the company.

- (b) Compulsory Ad-Hoc Declarations
  - If there are any potential conflict of interest which arises during the year, PMSB personnel shall make a compulsory declaration to the IGD within three (3) working days of the potential conflict of interest arising.
  
- (c) Declaration During Meetings
  - Any BOD, Tendering, or Procurement meeting member shall declare any know conflicts of interest to the IGD with any regards to their position or in relation to the content of the meeting's discussion;
  - Meeting members that become aware of a potential conflict of interest during the course of the meeting must declare it to the Meeting Chairman immediately.
  
- (iv) Administration and information storage:
  - ◆ Upon receiving the declaration of interest form(s), the IGD is responsible for storing the forms in a secure location;
  - ◆ Electronically stored information will be password protected with access restriction;
  - ◆ Access to information will be restricted to specified personnel as stated in (v) below.
  
- (v) Privacy and Confidentiality
  - ◆ To ensure employee's privacy and confidentiality, only specific authorised personnel will have access to the forms and information database. These include the Head of IGD and Head of HCD and Head of IAD;
  - ◆ Access to the forms and information database by non-designated personnel is allowed with written approval from Head of IGD.

### 5.1.2 PROCEDURES

- (i) Annual and Compulsory Ad-Hoc Declarations:
  - (a) Annual and Compulsory Ad-Hoc declarations are to be done by completing the Declaration of Interest Form;
  - (b) All declarations are collected by the IGD and compiled into the folders. IGD will review the information based on the employees' declaration to identify any conflict of interest risks and decide on appropriate action, with consultation with the respective HODV/HOD. Actions include:
    - Observation only;
    - Reallocation of duties for the employees involved;
    - Transfer of employees to a difference project or department; and
    - Any other actions deemed fit.

- (c) The IGD will record outcomes in the Corruption Risk Management and report to BRIC.
- (ii) Declaration during Meetings:
- (a) For all BOD, Tendering and Procurement Meetings, the meeting secretary will provide a copy of "Script for Committee Chairman with Regard to Declaration of Interest Forms" to the Meeting Chairman;
- (b) The Meeting Chairman will read of the Script before the meeting commences;
- (c) Meeting members shall declare any potential conflict of interest to the Meeting Chairman as soon as it arises;
- (d) The Meeting Chairman and Meeting members will decide on the course of action for the affected member(s). this includes asking members with conflict of interest to:
- Leave the meeting room;
  - Withdraw from participating in a specific part of the meeting;
  - Abstain from any decision making, which includes voting;
  - Withdraw from participating in the project; and
  - Any other action deemed fit.
- (e) Once the agreement has been reached, the action will be enforced by the Meeting Chairman, and the meeting will proceed;
- (f) All agreed upon actions shall be recorded by the Meeting Secretary in the meeting minutes;
- (g) The Meeting Secretary shall prepare an extraction of meeting minutes detailing with the conflict of interest declared and actions taken during the meeting. The extraction of minutes will be given to the IGD.
- (h) The IGD will record outcomes in the Corruption Risk Management. Director and non-director related declarations shall be reported to the BGRIC.

## 6.0 VIOLATIONS

Non-compliance to this policy include:

- (a) Not meeting submission timelines;
- (b) Producing false information (whether intentionally or unintentionally);
- (c) Accessing or making amendments to the records containing information from the declaration forms without approval from the IGD;
- (d) Distributing information in the declaration forms to unauthorized person.

Disciplinary action shall be applied on PMSB personnel who is proven to have violated the policy, which may include the following:

- (a) Written warning;
- (b) Fine;
- (c) Forfeiture or emoluments;
- (d) Deferment of salary increase;
- (e) Deduction of salary;
- (f) Demotion;
- (g) Dismissal; and
- (h) Legal action as deemed fit by PMSB.

IAD shall with the consent of BGRIC and CEO be allowed to appoint at the Company's cost suitable external consultants and/or experts from time to time necessary to facilitate the Department in carrying out its duties and responsibilities.

## 7.0 REVIEW AND INSPECTION

IGD will conduct reviews to ensure compliance to this policy as defined below:

- (a) IGD has received and compiled declarations of interest form from all PMSB personnel;
- (b) Respective HODV/HOD are responsible to monitor any declaration of interest made by their staff to mitigate any potential conflict of interest;
- (c) Members of meeting declare any potential interest at the beginning of the meeting;
- (d) The IGD has stored the information in a secured manner or location; and
- (e) There is no unauthorized access to the records