YP MAINTENANCE SDN. BHD.
201301003946 (1033787-X)



CONFLICT OF INTEREST POLICY

INTEGRITY UNIT

YP MAINTENANCE SDN. BHD.

A. OBJECTIVE

To establish a clear and standardized policy for identifying, disclosing, and managing conflicts of interest in YP Maintenance Sdn. Bhd. (YPMSB), thereby upholding ethical standards, transparency, and public trust.

B. SCOPE

This Policy applies to all YPMSB personnel, directors, contractors, consultants, vendors, suppliers, service providers and any third parties acting on behalf of YPMSB .

C. TERMINOLOGY

1. **Conflict of Interest**: A situation where personal interest could interfere with professional responsibilities or decisions made on behalf of the organization.
2. **Interest**: Financial, familial, or any benefit gained that may compromise objectivity.
3. **Relatives & Associates**: As defined in Section 3 of the Malaysian Anti-Corruption Commission (MACC) Act 2009 (Act 694), including spouses, siblings, in-laws, descendants, trustees, partners, etc.
4. **Third Party**: Contractors, vendors, suppliers, consultants, service providers, regulators, public officials, stakeholders, or any parties dealing with YPMSB.
5. **YPMSB Personnel**: Anyone employed under permanent, contract, secondment, temporary, or part-time roles.

D. POLICY STATEMENT

YPMSB is committed to conducting its business with integrity, transparency and accountability. All personnel and relevant third parties shall avoid situations where personal interests conflict, or may be perceived to conflict, with their duties and responsibilities to YPMSB. All actual, potential or perceived conflicts of interest shall be declared, assessed and managed appropriately to protect the interests and reputation of YPMSB.

E. PROHIBITED CONFLICT OF INTEREST SITUATIONS

YPMSB personnel shall avoid and are prohibited from engaging in any actual, potential or perceived conflict of interest, including but not limited to:

1. Engaging directly or indirectly with third parties for personal interests that conflict with official duties.
2. Holding personal, financial or business interests in third parties involved in official dealings with YPMSB.

F. PROHIBITED CONFLICT OF INTEREST SITUATIONS (cont.)

3. Allowing themselves or their relatives/associates to act in a manner that creates a conflict with their official responsibilities.
4. Participating in procurement, contract management, recruitment, evaluation or decision-making processes involving parties in which they, their relatives or associates have an interest.
5. Disclosing confidential or proprietary information for personal benefit or for the benefit of a third party.
6. Conducting transactions related to official YPMSB matters through personal accounts or unauthorized channels.
7. Receiving compensation, fees, commissions, rewards, services, gifts, hospitality or other benefits from third parties that may influence, or appear to influence, official decisions.
8. Using their position or authority to secure employment, promotion, business opportunities or other benefits for themselves, relatives or associates.
9. Influencing or attempting to influence decisions, recommendations or approvals for personal gain or for the benefit of relatives or associates.
10. Misusing their position, authority or access to information to obtain preferential treatment, unfair advantage or any benefit from a third party.

By aligning with Anti-Bribery Management System and Corporate Intergrity System Malaysia (CISM), YPMSB promotes a culture of ethical behaviour, safeguards institutional integrity, and reinforces public trust in its operations.

G. EXTERNAL PROVIDER CONFLICT OF INTEREST

1. Vendors, suppliers, contractors, subcontractors, consultants and service providers shall declare any actual, potential or perceived conflict of interest that may affect their dealings with YPMSB.
2. External Provider conflict of interest declarations shall be reviewed by the respective department.
3. Appropriate control measures shall be implemented where necessary.
4. Significant External Provider conflict of interest cases shall be reported to the Integrity Unit.

H. . STAFF CONFLICT OF INTEREST

1. All employees shall declare any actual, potential or perceived conflict of interest that may affect their impartiality, objectivity or performance of their duties.
2. Staff conflict of interest declarations shall be submitted using the prescribed declaration form and reviewed by the respective Head of Department (HOD).
3. Where a conflict of interest is identified, appropriate control measures shall be implemented. The affected employee shall not participate in the related decision-making, evaluation or approval process.
4. Employees shall update their declaration whenever there is any change in circumstances that may give rise to a conflict of interest.
5. Significant conflict of interest cases shall be reported to the Integrity Unit for further assessment and appropriate action.
6. Failure to declare a conflict of interest or providing false or misleading information may result in disciplinary action in accordance with the Company's policies and applicable legal requirements.

I. COMPLIANCE

1. Failure or refusal to comply with this policy may be treated as misconduct and subject to disciplinary action under YPMSB's internal policies and applicable laws.
2. Any violation by third parties may be reported to the relevant authorities including the Ministry of Finance, Malaysian Anti-Corruption Commission (MACC), Companies Commission of Malaysia (SSM), or other regulators for further action.

J. ENQUIRIES AND REPORTING

Any enquiries or reports relating to conflict-of-interest matters may be submitted through the approved Whistleblowing Channels and/or the Integrity Unit.

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Managing Director
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