



## **CONFLICT OF INTEREST DISCLOSURE STATEMENT**

### **Section 1: Conflict of Interest**

Employees should avoid any situation that involves, or appears to involve, a conflict between their personal interests and the interests of the Company. That means employees should avoid circumstances that might affect their judgement or impartiality when performing their jobs.

Employees with a conflict of interest must disclose any obligation, commitment, relationship or interest that could conflict or may be perceived to conflict with his or her duties by making a declaration using the Conflict of Interest Disclosure Statement which is available at the IOI Corporate Intranet or you may contact your respective Human Resource Department for a copy.

Where an employee is found to have any real, apparent or potential conflict of interest but failed to declare it, the employee is in violation of the Code of Business Conduct and Ethics and may be subject to legal claims or proceedings or disciplinary measures including termination of employment.

### **Section 2: Disclosure Procedure**

The existence of any real, apparent or potential conflict of interest shall be disclosed before any contract is entered into or any transaction is carried out. Transactions with parties with whom a conflict of interest may exist shall only be undertaken if all of the following conditions are complied with:

1. The details of the real, apparent or potential conflict of interest shall be fully and promptly disclosed to the person approving the transaction and Division Head.
2. The person with the conflict of interest shall be excluded from the discussion, negotiation, tender, voting and/or approval of such contract or transaction;
3. A competitive bid or comparable valuation of the contract or transaction has been carried out; and
4. The person approving the transaction/Executive Director/Executive Chairman/General Manager has determined that the contract or transaction is in the best interest of IOI Group.



# IOI GROUP

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## Section 3: Conflict of Interest Disclosure Statement

### Instructions:

1. Please tick boxes if the conflict of interest situations apply to you in the questions below. The term “affiliated persons” includes:
  - a) Your immediate family members, i.e. spouse, children, parents, siblings or any relatives.
  - b) Any corporation or organisation or entity of which you are a board member, a committee member, a director, an officer, a partner or an employee; and
  - c) Any corporation or organisation or entity of which you are a shareholder or the beneficial owner of any class of securities (with the exception of holdings in public-listed companies, unless you have substantial holdings of 5% or more).
  
2. This Conflict of Disclosure Statement shall be submitted by you at any point in time when a real, apparent or potential conflict of interest situation arises.

NAME: \_\_\_\_\_

POSITION: \_\_\_\_\_

DEPARTMENT/COMPANY: \_\_\_\_\_

*(Please tick boxes if applicable)*

No.	Conflict of Interest Situations	
1	Are you or any of your affiliated persons an owner/part-owner/director/shareholder/officer of an IOI Group’s customer, distributor or supplier?	<input type="checkbox"/>
2	Do you or any of your affiliated persons have any direct or indirect interest in any business transaction with IOI Group of companies?	<input type="checkbox"/>
3	Are you or any of your affiliated persons involved in any business that is in direct or indirect competition with IOI Group of Companies?	<input type="checkbox"/>
4	Do you have any financial or personal gain from the transaction or dealing between IOI Group and its customer, distributor, supplier or business partner, or, did you receive any financial or personal benefits, such as gifts, salary, fees, loans or guarantees of obligations, free service or discounts?	<input type="checkbox"/>
5	Do you have an opportunity for personal gain through your position or through the use of IOI Group’s facilities, equipment, systems or other properties?	<input type="checkbox"/>
6	Is any of your immediate family members an employee of the IOI Group of Companies? <i>(If applicable, kindly furnish a copy of this Disclosure Statement to your respective Human Resource Department)</i>	<input type="checkbox"/>
7	Are you aware of any other events, transactions or situations that have occurred or may occur in the future that you believe should be brought to the knowledge of the IOI Group’s Board of Directors?	<input type="checkbox"/>

