



HEXTAR HEALTHCARE BERHAD
(formerly known as Rubberex Corporation (M) Berhad)
199601000297 (372642-U)

CONFLICT OF INTEREST POLICY

1.0 INTRODUCTION

Hextar Healthcare Berhad (formerly known as Rubberex Corporation (M) Berhad) ("Hexcare" or the "Group") and its subsidiary companies aim to manage conflict of interest situations. Accordingly, Hexcare is committed to upholding high ethical standards and expects its employees to conduct themselves with integrity, impartiality, and professionalism at all times, as well as to prevent any conflict of interest that may arise in the performance of their duties.

2.0 PURPOSE

The purpose of this Conflict of Interest Policy ("Policy") is to define what constitutes a conflict of interest situation and to provide guidance on how to deal with situations involving conflict of interest situations as and when they arise.

3.0 SCOPE

This Policy applies to the directors and employees of Hexcare including family members, contracted employees having employment relationships with our Group, and temporary staff working under the control and supervision of the Group. It is also subject to the Board of Directors' approval and comes into force on the date it is approved by the Board.

This Policy applies whenever an individual recognises, or should reasonably recognise, that a conflict of interest may arise from their current or future activities. The Policy provides guidance on how to identify and declare all conflicts of interest, how to develop, implement, and monitor actions to appropriately manage the conflict, and how to deal with breaches of

this Policy. The scope of this Policy is relatively wide in its coverage of activities that may give rise to conflicts of interest. As it is not possible for the Policy to be all-inclusive, Directors and employees must exercise reasonable judgement and comply with the spirit of this Policy and not just the letter of the Policy.

4.0 DEFINATIONS

4.1 "Conflict of interest" refers to a situation in which a person has competing interests and the serving of one interest could improperly influence the performance of duties and responsibilities, which may be at the detriment and/or personal gain of another. A real conflict of interest exists at the present time, and a potential conflict of interest could be reasonably foreseeable to exist in the future.

4.2 "Family member" refers to the spouse, parent, brother, sister, child (including adopted or stepchild), a lineal ascendant or descendant (e.g. parents or children), son-in-law, or daughter-in-law of the individual.

4.3 "Stakeholders" refers to suppliers, bankers, contractors, agents, distributors, customers, and other business partners who have direct or indirect dealings with the Group.

4.4 "HOD" refers to Head of Department / Division.

4.5 "MD" refers to Managing Director.

5.0 CONFLICT OF INTEREST SITUATIONS

In general, a conflict of interest would arise when a person's capacity to carry out his or her duties effectively and impartially is potentially impaired by personal interests, considerations or relationships.

Examples of situations likely to give rise to conflict of interest include:-

- a) Equity ownership in entities having a business relationship with Hexcare
- b) Directorship, partnership or other forms of beneficial interest in entities having a business relationship with Hexcare
- c) Other employment, business appointments or undertakings
- d) Personal relationships
- e) Contractual dealings with employees
- f) Dealings with competitors
- g) Involvement in activities where the Director or employee concerned is the subject matter
- h) Acceptance of meals or entertainment

6.0 PROCEDURES

6.1 Duty to Disclose

Every employee of Hexcare is obligated to disclose any known or potential conflicts of interest as soon as they arise. Failure to do so could result in the termination of employment and business relations. Directors are required to declare at all times the nature and extent of any conflict of interests, whether direct or indirect, or whether actual or potential, with the Company or its subsidiaries, and to recuse themselves from any deliberation or decision relating thereto if so required by the Board.

6.2 Investigating Potential Conflicts

When a possible conflict of interest arises, the Board of Directors shall collect all of the pertinent information and may question any concerned parties. If the Board determines that a conflict exists, steps will be taken to address the conflict. If no conflict exists, the inquiry may be documented, but no further action will be taken.

6.3 Addressing Conflicts of Interest

When an actual conflict of interest is found, any transactions that may have been affected will be reviewed retroactively. Affected parties both within and outside of the business, including shareholders, directors, employees, and contractors will be notified. An investigation will also be conducted by the Board of Directors to determine the extent of the conflict and the intentions of the parties involved. If the conflict in question involves a member or members of the board of directors, such a member will be excused from the deliberations.

6.4 Investigation and Disciplinary Action

As all conflicts of interest will be reviewed on a case-by-case basis, a review may result in disciplinary action. The Board of Directors has full discretion to deem what disciplinary action is both fitting and necessary, including suspension and/or termination of employment.

7.0 RECORDS

For conflicts of interest involving Directors or employees, the secretary of the company shall maintain records of every conflict of interest disclosure as well as other related documents.

August 2023

CONFLICT OF INTEREST DECLARATION FORM
BORANG PENGISYTIHARAN KONFLIK KEPENTINGAN

Name: Nama:		Employee No.: No. Pekerja:	
Phone No.: No. Telefon:		Email Address: Alamat Emel:	
Immediate Superior: Pengawai Atasan:		Designation/Department: Jawatan/Jabatan:	

Details of Conflict of Interest

Butiran Konflik Kepentingan

Description of conflict:

Penerangan konflik:

When did the conflict arise?

Bilakah konflik ini timbul?

Impact/potential impact of conflict:

Kesan/kesan berpotensi konflik:

Actions taken to address conflict:

Tindakan yang diambil untuk menangani konflik:

Disclosure of conflict

Pendedahan konflik

Disclosed to HOD : Yes / No

Didedahkan kepada Ketua Jabatan : Ya / Tidak

Date of disclosure to HOD:

Tarikh pendedahan kepada Ketua Jabatan:

Declaration:

Pengisytiharan:

I hereby declare that the information provided herein is complete and accurate.

Saya dengan ini mengaku bahawa maklumat yang diberikan di sini adalah lengkap dan tepat.

.....

Name:

Nama:

Date:

Tarikh:

Acknowledged by HOD:

Diakui oleh ketua jabatan:

Remarks by MD:

Catatan oleh Pengarah Urusan”