



## MMCS GROUP Conflict of Interest Policy

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### 1. Policy Statement

MM COMPUTER SYSTEMS SDN. BHD. ("MMCS") and its subsidiaries, which include Micro Technology Solution Sdn Bhd ("MTS") and SMIND Sdn Bhd ("SMIND") (the "**Group**") upholds high ethical standards in all business dealings. Employees, contractors, and stakeholders must avoid conflicts of interest that could affect integrity or the company's reputation.

### 2. Purpose

This policy defines conflicts of interest, sets disclosure responsibilities, and outlines procedures to manage conflicts, ensuring MMCS's best interests.

### 3. Scope

This policy applies to all employees, contractors, directors, and any individuals associated with MMCS who may have access to company information or influence business decisions.

### 4. Definition of Conflict of Interest

A conflict of interest arises when an individual's personal interests interfere with the interests of MMCS. Examples include:

- Financial or personal relationships that influence business decisions.
- Engaging in business with MMCS competitors.
- Using company resources for personal gain.

### 5. Identifying Conflicts of Interest

In general, a conflict of interest would arise where a person's ability to perform their duties effectively and impartially is potentially impaired by personal interests, considerations, or relationships.

Generally, conflicts of interest may be described under the following broad categories:

- **Equity Ownership:** Holding shares in a business associated with MMCS (excluding minor publicly traded shares).
- **External Positions:** Directorships, partnerships, or employment in competing or related businesses.
- **Secondary Employment:** Other jobs or business ventures affecting performance at MMCS.
- **Personal Relationships:** Family members working in roles that create conflicts.
- **Contractual Dealings:** Transactions between MMCS and employees or their close contacts.
- **Competitor Dealings:** Involvement with a competitor's business interests.
- **Self-Involvement:** Employees being involved in decisions affecting themselves.
- **Gifts and Hospitality:** Accepting items that could impact objectivity.

## 6. Responsibilities of Employees

All employees must:

- Disclose actual or potential conflicts.
- Act with integrity and avoid situations leading to conflicts.
- Follow company guidelines on conflict resolution.
- Seek guidance from HR if unsure about a conflict.

## 7. Disclosure Requirements

Employees must disclose conflicts of interest to their supervisor or HR in writing. MMCS will review and determine appropriate action to manage the conflict.

## 8. Prohibited Activities

All employees must not:

- Accept gifts or benefits that could influence business decisions.
- Hold significant financial stakes in competitors, suppliers, or clients.
- Use company resources for personal benefit.

## 9. Conflict of Interest Resolution

MMCS will assess disclosed conflicts and take appropriate measures, such as:

- Require recusal from decision-making.
- Reassign duties.
- Terminate conflicting relationships if necessary.

## **10. Consequences of Non-Compliance**

Violations may result in disciplinary action, including termination, legal consequences, or other corrective measures.

## **11. Reporting and Whistleblowing**

Employees can report suspected conflicts of interest anonymously through the company's whistleblowing channel. MMCS ensures protection against retaliation for reporting in good faith.

## **12. Review and Amendments**

This policy will be reviewed periodically and updated as necessary to align with legal and business requirements. Employees will be notified of any changes.