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**Human Resources Division**  
**MEMORANDUM**

To : All Employees

c.c. : Tan Sri William Cheng  
Group Executive Chairman

From : Tan Sri Albert Cheng  
Group Executive Director

Date : 5 October 2022

Subject : **CONFLICT OF INTEREST (COI) AND ANTI- BRIBERY AND CORRUPTION  
(ABC) DECLARATIONS 2022**

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It is the time of the year for all employees at Job Grade D3 and above to submit their annual COI and ABC Declarations.

We would like to remind all employees that the Management of Lion Group insists on honesty and integrity in the conduct of their business transactions, duties and dealings. To this end, please note that Section 19 A, B, C, D, E & F of the Group Human Resources Policies, ABC Policy and all other Company Policies, Procedures and Guidelines have been put in place and enforced to safeguard the interests of Lion Group of Companies and its employees.

Conflict of Interest and Anti-Bribery and Corruption Declarations (Employees at Job Grade D3 and above)

The following elements are the most common means of personal exposure, which may be considered as potential for Conflict of Interest (COI), bribery, corruption and breaches or infringements of Code of Conduct:

- Financial, shareholding/equity interests and directorship in companies outside The Lion Group of Companies (e.g. vendors, suppliers or distributors), including the undertakings or arrangements of employment of persons or members of the employees' families in those companies, that would give rise to direct or indirect conflict with the interests of The Lion Group of Companies;
- Any activity, investment, interest, association or relationship (including relationships with family members, relatives, friends and social acquaintance), which conflicts with the exercise of independent judgment in connection with the employee's duties and/or employment with the Company of The Lion Group, e.g. those involving the procurement and tendering or recruitment functions;

- Employee's outside employment/consultancy/engagement and/or business activities, not immediately in direct or indirect conflict with The Lion Group of Companies which nonetheless may be incompatible with the employee's contracted employment, position/rank, roles and responsibilities within The Lion Group without obtaining prior approval from the Group Chairman's Office (GCO);
- Use of the Company's assets, resources and Company privy/market sensitive/proprietary information for non-Company but personal use and gains including and not limited to securing personal pecuniary and market advantage for personal financial gains/abuse;
- Receiving or offering gifts, business courtesies, bribes, kickbacks and/or hospitality such as entertainment and related services;
- Disclosure of confidential, proprietary and business sensitive information to parties not related to The Lion Group of Companies.

In line with the above, all employees are required to avoid any Conflict of Interest between their private activities or interests from that of the Company's or Lion Group of Companies.

All employees shall not offer, solicit, or accept bribes in order to gain business or personal advantages, or engage in any activity that can be construed as having contravened the anti-corruption laws of Malaysia and applicable foreign laws.

#### Declaration of Gifts, Benefits and Courtesies (All Employees)

Regarding the receipt of gifts, benefits or courtesies from third parties, the following are applicable:

- Receiving gifts, benefits or courtesies from a party with whom the Company/Group has a business relationship which may give rise to suspicion that such an act constitutes an acceptance of inducement that could create conflict of interest, compromise interest of the Company/Group and may even be against the applicable laws.
- If you have received or been offered gifts, benefits or courtesies with a token value of RM80 or above, please complete and forward the Declaration of Gifts, Benefits and Courtesies Form to the Head of Department / Head of Company for approval on acceptance, treatment and record purposes.
- Gifts, Benefits and Courtesies declarations must be made for every instance it occurs.

#### e-Declarations

For COI and ABC declarations for employees at Job Grade D3 and above, we will use the electronic-declaration (e-declaration) where employees will be able to submit their declarations electronically.

It is compulsory for all employees at Job Grade D3 and above in Lion Group of Companies to submit their e-declarations latest by 31 October 2022. After the deadline, the e-declaration system will be disabled.

Please note that your respective HR Managers will communicate to you on the e-declaration submission process, where necessary.

Please be guided accordingly.

Thank you and regards,

A handwritten signature in black ink, appearing to be 'TAN SRI ALBERT CHENG', written over the printed name and title.

**TAN SRI ALBERT CHENG**  
Group Executive Director