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## Human Resource Policy- Conflict of Interest

**Effective Date:** 01 Aug 2025

**Policy Owner:** Human Resources Department

**Reviewed By:** Vivian Heng

**Next Review Date:** 31 Jul 2026

### 1. Purpose

To uphold the integrity, transparency, and accountability of all employees by preventing situations where personal interests conflict with professional responsibilities or the Company's interests.

### 2. Scope

This Policy applies to all employees, contractors, directors, and individuals acting on behalf of DG Packaging.

### 3. Definition

A *conflict of interest* arises when personal, financial, or external interests compromise — or appear to compromise — an individual's ability to act in the best interest of the Company.

### 4. Examples of Conflicts

- Holding financial interest in a competitor or vendor
- Using company resources for personal gain
- Hiring or supervising a family member
- Accepting gifts or favors that may influence business decisions
- Engaging in outside employment that interferes with company duties

### 5. Other Employment & Exclusivity

In accordance with Clause 3 of the Employment Agreement:

- Employees must devote full time and attention during scheduled working hours to assigned duties
- No other employment, business, or activity — paid or unpaid — may be undertaken if it:
  - Conflicts with responsibilities at DG Packaging
  - Compromises the Company's interests, confidentiality, or reputation
  - Occurs during working hours without prior written approval

External activities outside working hours are permitted only if they do not interfere with job performance or breach this Policy

### 6. Disclosure Requirements

Employees must:

- Disclose any actual, potential, or perceived conflicts to HR or their supervisor
- Submit a Conflict-of-Interest Declaration Form annually or upon change in circumstances



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## **7. Management of Conflicts**

- HR will assess disclosures and determine appropriate mitigation steps
- May include reassignment, recusal from decisions, or termination of conflicting relationships

## **8. Prohibited Conduct**

- Concealing a conflict of interest
- Participating in decisions where a conflict exists
- Using confidential company information for personal benefit

## **9. Disciplinary Action**

Violations may result in disciplinary measures, including termination, depending on severity and intent.

## **10. Annual Certification**

All employees must certify compliance with this policy annually.