

CONFLICT OF INTEREST POLICY

KINABALU INTERNATIONAL HOTEL SDN. BHD.

1. OBJECTIVE

This Conflict of Interest Policy is to ensure that actual, potential and perceived conflicts of interest are identified and managed effectively to prevent things that could damage KIH's image and reputation when performing their duties with transparency, honesty and integrity. It is intended to provide guidelines on how to deal with Conflict of interest situations as they arise.

2. CONFLICT OF INTEREST POLICY

It is the responsibility of KIH Board of Directors, Personnel and Business Associates to identify and manage conflicts of interest on an ongoing basis and are required to:

- (i) Act with objectivity, integrity and independence, and exercise sound judgement and discretion;
- (ii) Promptly declare any actual, potential or perceived conflicts of interest in accordance with this Policy, remove themselves from the decision-making process and not seek to influence such decisions any further; and
- (iii) Wherever possible, avoid situations where conflicts of interest may arise as described in this Policy.

Situations where conflict of interest may arise are when the Board of Directors, Personnel, Business Associates or their family members and /or dependants have financial or beneficial interest from the outcome of the situation. Example of situations where conflict of interest may arise are as follows:-

- (a) Equity ownership in a competitor company or entities having a business relationship/ potential business relationship with KIH;
- (b) Directorship, partnership or other forms of beneficial interest in a competitor company or entities having business relationship or potential business relationship with KIH;
- (c) A personal association or relationship with those affected, or those who are likely to be affected, by the information or issue in question;

- (d) An expectation of a future interest (for example, future employment, business appointments or undertakings); or
- (e) Involvement in activities where the Director, Personnel or Business Associates concerned is the subject matter.

3. DISCLOSING CONFLICT OF INTEREST

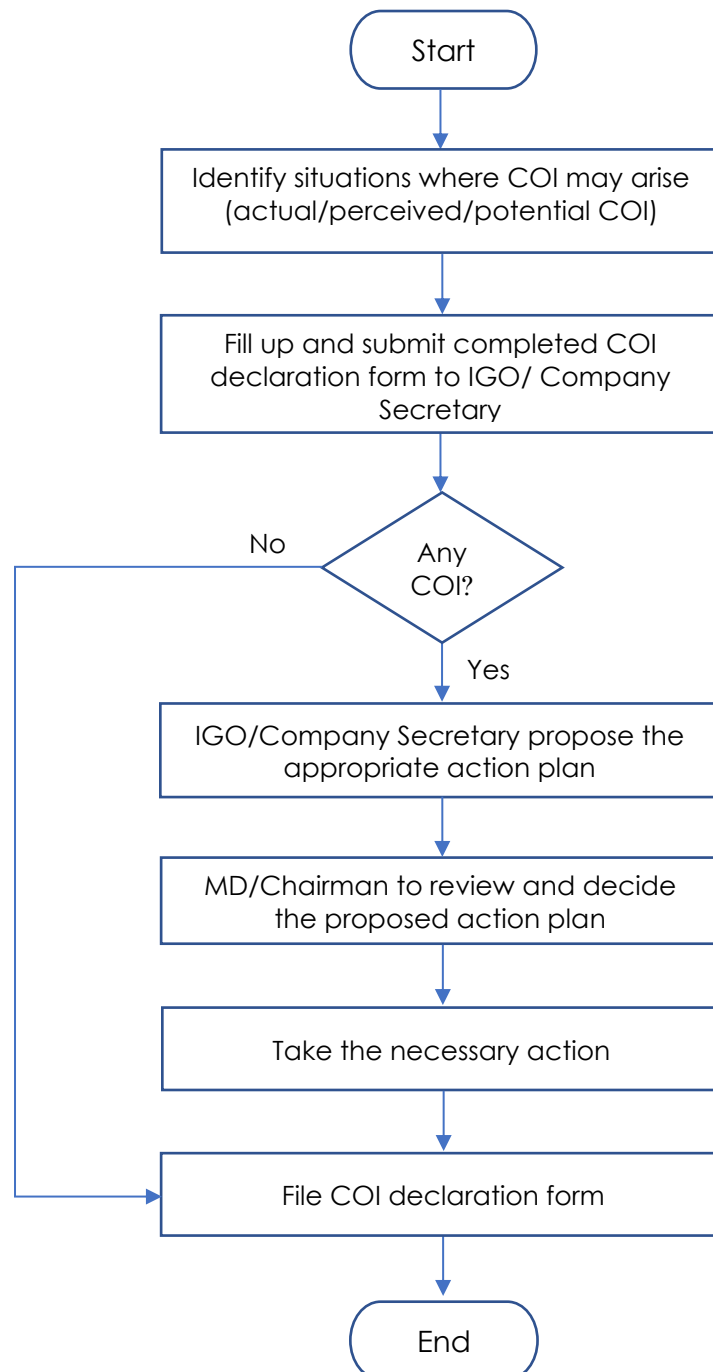
KIH Board of Directors and Personnel must complete the Conflict of Interest Declaration Form as soon as they are aware of an actual, perceived or potential Conflict of Interest situation. Business Associates will be required to fill up the Conflict of Interest Declaration Form prior to KIH's engagement with them.

The duly completed Conflict of Interest Declaration Form is to be submitted to IGO or in the case of Directors, to the Company Secretary. IGO/ Company Secretary would then propose the appropriate action plan to resolve/manage the matter. Managing Director or in the case of Directors, Chairman will review the conflict of interest disclosure and decide on the proposed plan to resolve the matter.

5. BREACH OF POLICY

Failure to disclose known, suspected, actual, potential or perceived conflicts of interest may be subject to investigation and potential disciplinary actions being taken by KIH or be punished as per the Malaysian Anti-Corruption Commission Act (MACCA) or any relevant Laws of Malaysia.

CONFLICT OF INTEREST (COI) FLOWCHART





**KINABALU INTERNATIONAL HOTEL SDN BHD
CONFLICT OF INTEREST (COI) DECLARATION FORM**

I hereby declare that:-

I, my family members and /or dependants **HAVE NO** potential, perceived and/or actual financial or other personal interest, direct or indirect, in any matter that conflicts with my duties as a Director/personnel/Business Associates* (**Strike off whichever that is not relevant*) of Kinabalu International Hotel Sdn. Bhd.

I, my family members and /or dependants **HAVE** potential, perceived and/or actual financial or other personal interest, in matter that conflicts with my duties as a Director/personnel/Business Associates* (**Strike off whichever that is not relevant*) of Kinabalu International Hotel Sdn. Bhd.

(Family Members - Includes a person's spouse(s), children (including step-children and adopted children), parents, and/or Dependants step-parents, siblings, step-siblings, grandparents, grandchildren, in-laws, uncles, aunts, nieces, nephews, and first cousins, as well as other persons who are members of your household.)

Please state details on the nature of COI:-

I hereby solemnly declare that the information provided is true, correct and complete.

(Signature)

(Date)

Name : _____

Designation : _____

Company : _____

I understand that I need to promptly declare any actual, perceived or potential conflict of interest as soon as it arises by using this form. I also understand that I need to keep disclosing any conflict of interest that I have previously already reported to ensure that the company has the most recent and relevant information.

PARTY CONSULTED*

I have reviewed the conflict of interest disclosure and propose the following action plan to resolve/manage this matter:

_____ (Signature) _____ (Date)

Name : _____

Designation : _____

Company : _____

APPROVAL*

I have reviewed the conflict of interest disclosure and agree to implement the proposed plan to resolve this matter:

_____ (Signature) _____ (Date)

Name : _____

Designation : _____

Company : _____