



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



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.