

ANCOM LOGISTICS BERHAD [Registration No.: 196601000150 (6614-W)] (Incorporated in Malaysia)	Date of Revised Statement	29 July 2026
	Approved by the Board of Directors	29 September 2026
	Supersedes	Conflict-of-Interest Policy dated 1 August 2024

CONFLICT-OF-INTEREST POLICY

1. INTRODUCTION

Ancom Logistics Berhad (“ALB” or “Company”) and its subsidiaries (collectively “Group”) are committed to upholding the highest standards of ethics, integrity and corporate governance. All Directors and Senior Management of the Group must act professionally, impartially and in the best interests of the Group at all times and must avoid situations where a conflict of interest may arise in the performance of their duties.

This Conflict-of-Interest Policy (“Policy”) establishes the principles, responsibilities and processes for identifying, disclosing, managing and monitoring actual, potential and perceived conflict of interest, including interest in any competing business.

This Policy is supplemental to and must be read together with the Companies Act 2016, Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 (“AMLA”), the ACE Market Listing Requirements of Bursa Malaysia Securities Berhad (“Listing Requirements”) and Malaysian Code on Corporate Governance 2021 (“MCCG”). All Directors, major shareholders and principal officers of the Group are required to comply with the applicable statutory and regulatory provisions at all times.

2. PURPOSE

The purpose of this Policy is to provide a clear governance framework, together with appropriate controls and procedures, to ensure consistent and effective identification, assessment, disclosure, escalation, avoidance and management of all conflict-of-interest situations across the Group to ensure timely monitoring of the reporting requirements to the relevant authorities.

3. SCOPE

This Policy applies to all Directors, key Senior Management and major shareholders of the Group, who are, or may become, involved in any actual, potential or perceived conflict-of-interest situation (hereinafter each referred to as an “Interested Person” or collectively “Interested Persons”). In addition to the Code of Conduct and Ethics, Employees who handled sensitive information or are involved in decision-making process that may give rise to actual, potential, or perceived conflict of interest are also to be regarded as Interested Persons.

4. IDENTIFYING CONFLICT-OF-INTEREST

4.1 A conflict-of-interest arises where an individual’s personal interests, relationships, financial considerations or external activities could, or could reasonably be perceived to impair the objective, impartial or effective performance his/her duties to the Group.

4.2 Conflict-of-interest situations may arise, but are not limited to the following: -

(a) **Equity ownership in a business**

Where an Interested Person (directly or indirectly, including through family members) holds shares in privately owned entities having a business relationship with the Group. This excludes ownership of shares in publicly listed companies, unless the holding is material (more than 5% and not a decision maker who could affect the Group) and the Interested Person has involvement or influence over decision affecting the Group.

(b) **Directorship or partnership**

Where the Interested Person holds material ownership (more than 5%) and decision-making role in an entity that has or seeks a business relationship with the Group.

(c) **Secondary employment, business appointment or undertakings**

Where external employment, advisory roles, commercial activities or commitments may interfere with, or adversely affect the proper discharge of the Interested Person's duties within the Group.

(d) **Personal relationship**

Where close family members or dependents (spouse, children, parents and siblings) of the Interested Person hold ownership, directorship, partnership or employment in entities that have business dealings with, or compete with, the Group.

(e) **Dealing with competitors**

Where the Interested Person is involved in, or has influence over, an entity engaged in activities that are similar to or compete with the Group's business.

5. GENERAL RESPONSIBILITIES

All Interested Persons are responsible for identifying and managing conflict-of-interest on an ongoing basis (throughout their tenure with ALB and/or the Group) and are required to:

- (a) Familiarise themselves and comply with this Policy and all relevant laws, regulations and internal governance policies relating to the identification, documentation, escalation and management of conflict-of-interest;
- (b) Act with integrity, objectivity and independence, and exercise sound judgment at all times;
- (c) Proactively avoid, to the greatest extent possible, situations that may give rise to a conflict-of-interest; and
- (d) Immediately declare any actual, potential or perceived conflict-of-interest situation, abstaining from related decision-making and refrain from influencing deliberations.

Declaration must be made as soon as the Interested Persons becomes aware of the conflict.

6. MANAGING CONFLICT-OF-INTEREST

Upon determining that a conflict-of-interest exists, the Audit Committee as delegated by the Board shall:

- (a) Immediately inform the Board of the conflict-of-interest situation; and
- (b) Recommend appropriate actions, which may include directing the Interested Person to:
 - (i) Withdraw from all executive, operational decision-making involvement relating to the subject matter;
 - (ii) Attend Board deliberations if requested by the Chairman solely for the purpose of providing clarification (or factual information);
 - (iii) Abstain from Board discussions, deliberations and voting on matters in which he/she has any interests and refrain from influencing others in the decision-making process; and

- (iv) In serious, ongoing or irreconcilable conflict situations that significantly impairs fiduciary duties, resign from his/her position in the Group.

The Company Secretary shall record the disclosure, discussion and abstention in the minutes of the relevant meeting.

7. MAINTENANCE OF RECORDS

The Company Secretary shall maintain complete and updated records of all conflict-of-interest declarations, supporting documents, assessment, approvals and resolutions at least as per the regulatory required period. For directors, annual declarations must also be recorded and retained.

8. CONFLICT-OF-INTEREST DISCLOSURE

Any actual, potential or perceived conflict-of-Interest, including interests in competing business, must be disclosed as follows: -

- (a) Immediately to the Audit Committee for review, before submitting to the Board for consideration and endorsement;
- (b) In the Company's Annual Reports where relevant and required; and
- (c) In the Notices of Annual General Meetings when seeking election or re- re-election of Directors.

9. BREACH OF POLICY

- (a) In the event of any breach of this Policy, the Audit Committee shall notify the Board and recommend appropriate remedial, disciplinary or legal in accordance with the Policy.
- (b) Failure to disclose a conflict-of-interest constitutes a breach of this Policy. The Board reserves the right to take disciplinary and/or legal action against the non-compliant Interested Person ("Defaulting Party").

10. RELATED POLICIES

This Policy must be read together with ALB's Anti-Bribery and Corruption Policy and other relevant Group's governance policies. All Interested Persons must use the prescribed Conflict-of-Interest Declaration Form when making disclosures.

11. REVIEW AND PUBLICATION OF THE POLICY

The Board shall publish the Policy on the Company's website at www.ancomlogistics.com.my.

The Board shall review the Policy at least once every three (3) years and make such amendments as may be necessary to ensure that the Policy remains relevant, effective and consistent with the Board's objectives, the Company's needs, corporate governance best practices and applicable laws and regulations.

Changes to the Policy shall be subject to the approval of the Board.

ANCOM LOGISTICS BERHAD
Company Registration No. 196901000122 (8440-M)
(Incorporated in Malaysia)

CONFIRMATION BY DIRECTOR AND KEY SENIOR MANAGEMENT IN RESPECT OF CONFLICT-OF-INTEREST FOR THE PERIOD FROM () TO ()

I do hereby solemnly and sincerely declare as follows:-

1. I confirm that I have read and understood the Conflict-of-Interest Policy issued by Ancom Logistics Berhad.
2. *I am involved in the following conflict-of-interest situation (actual/potential) during the reporting period:

Please tick if applicable	Type of Interest+
	1
	2
	3
	4
	5

Please provide below details of conflict-of-interest or potential conflict of interest:

3. *I am not involved in any conflict-of-interest situation during the reporting period.

I hereby confirm that this is a complete true and correct disclosure of all conflict-of-interest or potential conflict-of-interest situations to the best of my knowledge.

Signature

Name :

Designation :

+ *The following are the 5 types of Interests as stated in this Policy:*

1. Equity ownership in a business

Where an Interested Person (directly or indirectly, including through family members) holds shares in privately owned entities having a business relationship with the Group. This excludes ownership of shares in publicly listed companies, unless the holding is material (more than 5%) and the Interested Person has involvement or influence over decision affecting the Group.

2. Directorship or partnership

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3. Secondary employment, business appointment or undertakings

Where external employment, advisory roles, commercial activities or commitments may interfere with, or adversely affect the proper discharge of the Interested Person's duties within the Group.

4. Personal relationship

Where close family members or dependents of the Interested Person holds ownership, directorship, partnership or employment in entities that have business dealings with, or compete with, the Group.

5. Dealing with competitors

Where the Interested Person is involved in, or has influence over, an entity engaged in activities that are similar to or compete with the Group's business.

* - to strike out whichever is not applicable.