



SWIFT ENERGY GROUP OF COMPANIES

CONFLICT OF INTEREST POLICY

1. POLICY STATEMENT

Swift Energy Technology Berhad (“SETB” or “the Company”) aims to maintain the highest ethical standards in carrying out our business activities. We recognize that this Conflict of Interests Policy (“this Policy”) forms part of our duties and obligations in ensuring the highest level of corporate governance amongst its Employees and externally with its Stakeholders.

2. DEFINITION

In this Policy, the following terms have the following definitions:

- a) “Employees” means all board of directors of SETB and its subsidiaries, employees of SETB and its subsidiaries including managers, executive officers, regular employees and contracted employees having employment relationships with our company, as well as temporary staff and seconded employees working under the control and supervision of SETB;
- b) “Stakeholders” means third party suppliers, SETB shareholders, bankers, contractors, agents, consultants, distributors, customers and such other business partner which has direct or indirect business dealings with our company;

3. SCOPE OF POLICY

This Policy is applicable to the SETB Employees, its Stakeholders and members of the public.

4. CONFLICT OF INTEREST DEFINITION AND SCOPE

Conflict of interest arises whereby an individual or entity’s personal interests’ conflict with its professional interests owed to their employer or the organization that it is representing. It also arises when an Employee favours personal gain over his duties to his organization or exploits his position to obtain personal gains.

Employees owe a fiduciary duty to the Company, and must not cause himself to be placed in a position where the Employee’s interests’ conflict with that of the Company.

The fiduciary duty requires the Employee to not derive any secret profit or advantage from a transaction through him by the Company. Employee should further avoid situations where their personal interests could inappropriately influence, alter or appear so in their business judgment or in performing their scope of duties in the Company.

5. DUTY TO DISCLOSE

Employee has a duty and an obligation to disclose any potential of conflict of interests in performing his duties to the Company. Such disclosure must be made as soon as the Employee becoming aware of such potential conflict. Such duty and obligation shall continue annually for as long as the conflict continues to exist.

Disclosures may be made to the Employee's immediate manager within seven (7) days after becoming aware of such conflict and submit a Conflict of Interest Declaration Form. The immediate manager must, as soon as practicable, notify the Human Resources Department of the Company. The Human Resources Department shall then report such disclosure to the **Executive Director** for deliberation in respect of the action plan.

6. MANAGING CONFLICT OF INTERESTS

Giving and accepting gifts

All Employees must strictly adhere to SETB Anti-Corruption Policy on managing gifts.

A gift is may be defined as anything of value including items such as money, securities, business opportunities, goods, services, entertainment, company sponsored events, food, drink or vacations.

Employees shall not:

- a) Accept, solicit, give or receive cash or cash equivalents (including but not limited to, cash convertible gift certificates or cards, securities and loans, etc.);
- b) Accept, solicit, give or receive anything that could be perceived as a bribe, payoff or improper influence;
- c) Use of position in any way to obtain anything of value from prospective or existing customers, suppliers or business partners;
- d) Provide lavish or extravagant entertainment frequently for an existing or prospective customer or supplier;
- e) Accept, solicit, give or receive gifts from any vendor/supplier during its selection or tender process;
- f) Participate in any action/omission that would cause the other person to violate their own company's standards for gifts and entertainment;
- g) Provide gifts or entertainment to an existing or prospective customer or supplier that are not declared to the management of the Company.

Charitable contributions

SETB in principle is supportive to contributions towards charitable organisations. However, Employees should perform the relevant due diligence procedures prior to dealing with such organisations.

This is necessary to prevent contributing to charitable organisations which may be engaged in crime, terrorism, scam or money laundering.

Charitable contribution that could influence business decisions and not in the best interest of the Company should be avoided.

All charitable contributions made on behalf of SETB should be declared and approved by the management or the relevant department of the Company.

Outside business activities

Employees have a duty to declare any involvement or potential involvement in business activities outside the Company in order to prevent potential conflict of interest.

Examples of outside business activities shall include but not limited to the following :

- a) Outside employment or business dealings with SETB or with existing or prospective SETB customers and suppliers in an employee's private capacity;
- b) Outside service as an advisor, consultant, director, officer or general partner of the entities which are connected to SETB business activities;
- c) Ownership of an outside business which is either as a sole proprietor or in partnership;
- d) Political involvement in a government appointed office;

Such involvement in the above are prohibited in general. However, the same may be allowed with an express approval by the management of the Company. The Company reserves the right to demand you to discontinue your involvement in any of the above if the company observes any conflict of interest.

Dealing with families and close personal friends

In principal, a family member and personal friend(s) are highly discouraged to have any business dealings with an Employee.

Conflict may arise if such family member or a personal friend is working for a company that have business dealings or potential involvement with SETB.

Employees have a duty to disclose to the Company of his involvement or potential involvement whereby such Employee has personal financial connections, financial interests or decision-making influence in such involvement. SETB reserves its right to demand an Employee to discontinue his involvement in such dealings if they perceive any conflict of interests.

An Employee who is involved or aware of the potential to be involved of conflict of interests in business dealings of the Company shall recuse himself from the particular dealing and any communication therein. The Employee should not further influence the particular dealing in any way whatsoever.

6. MANAGING CONFLICT OF INTERESTS (CONT'D)

Dealing with families and close personal friends (Cont'd)

While Employees may take part in legitimate financial, business, charitable and other activities outside their employment with the Company, any real, potential or perceived conflict of interest raised by those activities must be promptly disclosed to management and updated on a periodic basis.

7. CONFLICT OF INTEREST FOR DIRECTORS

As stated above, this Policy equally applies to SETB and its subsidiaries' directors. Under the laws of Malaysia, directors have a duty to avoid having any conflict of interest in making decisions for the company. A duty to avoid a situation whereby there is a possibility of conflict between the interests of the company and the direct or indirect interests of the director, or between the director's duties to the company and those to another person. Below are the instances whereby conflict of interest arises among directors:

- (a) when the directors have material interest in the transaction to be entered to by the Company; or
- (b) when a company engages with another company for a transaction and the director in the former is a director/substantial shareholder in the latter.

Managing the conflict of interests among Directors

In the event of a possible conflict of interest, directors shall, as soon as practicable after becoming aware of the relevant facts, declare the nature of the conflict of interests at a formal meeting of directors.

Directors who are interested in a transaction to be entered into by the Company by voting or may influence such transaction shall allowed to be in such meeting to fulfill the quorum but are restrained from participating in discussion or voting during the meeting to decide on the interested matter.

The governance of this Policy adopts the Companies Act 2016 and Bursa ACE Market Listing Requirements in respect of conflict of interests among directors.

8. OTHERS

This Policy shall be in line with the laws and regulations of Malaysia. In the event of conflict between this Policy and the laws of Malaysia, the latter shall prevail.

This Policy hereby supersedes any previous Conflict of Interest Policy and/or Guidelines. In the event of conflict between this Policy and SETB subsidiaries' Conflict of Interests Policy, this Policy shall take precedence.

This Policy shall form part, be read and implemented together with the following documents:

- i.) SETB Code of Conduct;
- ii.) SETB Anti-Corruption Policy; and
- iii.) SETB Whistleblowing Policy.