



## **CONFLICT OF INTEREST DISCLOSURE**

1. Kapital DX Sdn. Bhd (“KLDX” or the “Company”) values openness and promotes transparency in processes, procedures and decision-making and emphasizes consistency, fairness and probity as integral to our relationships, individual and collective, with all stakeholders.
2. KLDX recognises that a well-established system for identifying, assessing, disclosing and managing conflicts of interest increases its public accountability and reduces the risk of corruption, misconduct and bias in its operations and decision-making processes. KLDX has in place Conflict of Interest Policies and Procedures to identify, disclose and manage conflicts of interest. Our Directors and employees and other person(s) appointed or engaged by KLDX should, where possible, avoid conflicts of interest and ensure that their activities and interests do not conflict with their obligations.
3. Conflict of interests cannot always be avoided, and the potential for a conflict of interest exists in all aspects of KLDX operations. Conflicts may be actual, potential or perceived by others. Where conflicts of interest cannot be avoided, they must be disclosed and appropriately managed.

### **Disclosures**

1. **Disclosure on Conflict of Interest relating to IEO on Integra Healthcare Technology Sdn Bhd**

***Integra Healthcare Technology Sdn Bhd's (“Integra”) initial exchange offering (“IEO”) of Islamic investment note tokens (“i-INT”) is being hosted on the KLDX Platform.***

*KLDX wishes to disclose the following:*

1. *Tan Sri Dr Nik Norzrul Thani Bin N Hassan Thani, who is a director and shareholder of KLDX and the Chairman of the Board of Directors of KLDX, is also a director and shareholder of Integra, holding 0.48% shareholding in Integra; and*
2. *Dato’ Muthukumar A/L Ayarpadde, who has an indirect interest in shares in KLDX, is a substantial shareholder holding 69.52% shareholding in Integra.*

*Despite the common directorship and common shareholding in KLDX and Integra, KLDX is of the view that the relationships does not result in a conflict-of-interest situation which would prevent it from acting as the platform for Integra’s IEO, in view of the following:*

1. *Tan Sri Dr Nik and Dato’ Muthukumar A/L Ayarpadde are not involved in the assessment or decision-making process of KLDX in relation to Integra’s IEO or the listing of Integra’s i-INT;*
2. *neither of them is involved in the management of nor have any executive roles in KLDX;*
3. *the approving authority in KLDX for listing of IEOs comprises of an independent committee;*
4. *in the event of any deliberations or related party transactions requiring the prior approval of directors/ shareholders, they will abstain from voting in respect of their directorship and direct or indirect interest in Integra and KLDX on resolutions.*



2. Disclosures on payment to distribution agent or referrer in connection with IEOs

*KLDX wishes to disclose that it will receive distribution fees from issuers and will make payments to distribution agents and other third parties in connection with the referral and introduction of investors and distribution to investors of tokens to be hosted on the KLDX Platform.*