



## CONFLICT OF INTEREST DECLARATION FORM

(For Internal Use Only)

I hereby declare an actual/potential Conflict of Interest as follows:

- |  |                          |  |                          |
|--|--------------------------|--|--------------------------|
| A Dealings with Suppliers, Customers, Agents and Competitors | <input type="checkbox"/> | E Family Members and Close Personal Relationship | <input type="checkbox"/> |
| B Personal Dealings with Suppliers and Customers             | <input type="checkbox"/> | F Investment Activities                          | <input type="checkbox"/> |
| C Outside Employment and Activities Outside the Group        | <input type="checkbox"/> | G Support Letters                                | <input type="checkbox"/> |
| D Board Membership   | <input type="checkbox"/> |  |                          |

Please state details:

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Date)

Name:

Designation:

Department:

Company:



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### **PARTY CONSULTED (NOTE 1)**

I have reviewed the conflict of interest disclosure and propose the following action plan to resolve/manage this matter: [Refer to Page 3 for guidance]

|  |
|--|
|  |
|--|

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Date)

Name:

Designation:

Department:

Company:

### **APPROVAL (NOTE 1)**

I have reviewed the conflict of interest disclosure and agree to implement the proposed plan to resolve/manage this matter: [Refer to Page 3 for guidance]

| Conflict of Interest Resolution | Action Party |
|---------------------------------|--------------|
|                                 |              |

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Date)

Name:

Designation:

Department:

Company:

Note 1: Applicable for Employees only. The Conflict of Interest Resolution for Directors is to be supported by the relevant approval paper and meeting minutes documenting the decision made on the conflict resolution.



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### **TESTS FOR IDENTIFYING ACTUAL OR POTENTIAL CONFLICTS OF INTEREST**

**A. What duties or functions is the Director or Employee in question responsible for?**

[Refer to the Director's or Employee's job description, information describing his/her functions in the Group, duties flowing from regulation or legislation, Charters, Term of Reference, the Group Policies and Authorities (GPA), or other descriptions of duties]

**B. Does the Director or Employee in question have job-relevant personal interests that interferes with his/her objectivity in performing duties or exercising judgement on behalf of the Group (in relation to the COI Declaration made)?**

[Consider this: Personal or financial interest, relationship with internal party or external party or any other interest of a relevant kind]

|           |   |
|-----------|---|
| Option 1: | Yes, the applicable facts are clear that the Director or Employee has job-relevant personal interests.<br><br>Conclusion: The Director or Employee has <b><u>actual conflict of interest.</u></b>   |
| Option 2: | No, at the present moment he/she has personal interests which are not job-relevant, but it is reasonably foreseeable that, in the future, his/her personal interests could become job-relevant interests.<br><br>Conclusion: The Director or Employee has <b><u>potential conflict of interest.</u></b> |
| Option 3: | No, the Director or Employee has no personal interests which are job-relevant at the present moment or foreseeable future.<br><br>Conclusion: The Director or Employee has <b><u>no conflict of interest.</u></b>   |

Note:

The above guidance is intended to assist Directors and Employees to assess whether there is any potential or actual conflict of interest. If in doubt, please contact Group Compliance at [cobc@simedarbyplantation.com](mailto:cobc@simedarbyplantation.com)