



CONFLICT OF INTEREST DECLARATION FORM
(For Internal Use Only)

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

Dealings with Suppliers, Customers, Agents and Competitors	<input type="checkbox"/>	Board Membership	<input type="checkbox"/>
Personal Dealings with Suppliers and Customers	<input type="checkbox"/>	Family Members and Close Personal Relationship	<input type="checkbox"/>
Outside Employment and Activities Outside the Group	<input type="checkbox"/>	Investment Activities	<input type="checkbox"/>

Please state details:

(Signature)

(Date)

Name:
Designation:
Department:
Company:

PARTY CONSULTED*

I have reviewed the conflict of interest disclosure and propose the following action plan to resolve/manage this matter:

(Signature)

(Date)

Name:
Designation:
Department:
Company:

APPROVAL*

I have reviewed the conflict of interest disclosure and agree to implement the proposed plan to resolve this matter:

(Signature)

(Date)

Name:
Designation:
Department:
Company:

Explanatory Note:

Any Employee who is in a situation of actual or potential conflict must complete the Conflict of Interest (COI) Declaration Form as soon as the situation arises. The completed form shall be submitted to the Employee's immediate superior, comprising either Head of Business Unit (HBU)/Head of Business Segment (HBS)/Plantation Leadership Committee (PLC)/ Group Managing Director (GMD). The HBU/HBS/PLC/GMD shall engage with the relevant party as prescribed in this form to facilitate deliberation and approval, depending on the nature of the conflict. If you are uncertain on any matter relating to the disclosure, you should disclose and seek advice from Group Compliance (GCO).

The HBU/HBS/PLC/GMD shall then take such action as is considered necessary to safeguard the interests of the Group and/or provide dispensation under allowable circumstances. Where the conflict involves an award of contract or proposed contract with the Group, the terms of the contract are to be deliberated and decided independently e.g. through an independent tender committee if the approval is via a tender committee. You are also to refrain from participating in any of the tender process. As a Director, you must disclose the conflict to the Main Board, and where relevant, the prior approval of shareholders must be sought, in accordance with applicable laws and regulations.

Upon consultation and approval, you are required to comply with all the requirements and agreed action plan to resolve conflict. In the event that the conflict persists or remains unresolved, you are expected to continue disclosing the conflict of interest and submit the form annually.

Please refer to table below on submission of COI declaration, party to consult and COI action approver, based on the nature of COI and Hierarchy:

COI Declaration Table

Hierarchy	PLC Members	SDP Head Office	Business Segment	Business Unit	Operating Unit
A. Submission of COI Declaration Form to:	GMD	Respective PLC Member	HBS	HBU	HBU
B. Party to Consult (based on Nature of COI):					
<u>Procurement Related</u> 1. Dealings with Suppliers, Customers, Agents and Competitors 2. Personal Dealings with Suppliers and Customers	COSO	Head of Group Procurement	Head of Procurement at Business Segment (Malaysia/Indonesia/NBPOL); in absence of Head of Procurement at Business Segment, to consult the Head of Group Procurement		
<u>HR Related</u> 1. Outside Employment and Activities Outside the Group 2. Family Members and Close Personal Relationship	CHRO	Head of HR Operations	Head of HR at Business Segment (Malaysia/Indonesia/NBPOL); In absence of Head of HR at Business Segment, to consult the Head of HR Operations		
<u>Governance Related</u> 1. Board Membership 2. Investment Activities	Group Secretary				
C. Approve COI Action by:	GMD	Respective PLC Member	HBS	HBU	HBU

Retention of COI Declaration Record

Employee must submit the original copy of the approved Conflict of Interest Declaration Form to the respective HR Department for retention in the employee's personal file. It is the responsibility of the employee to keep a copy of the approved form for audit purposes. Employee must also provide a copy to Head of Department for safekeeping and reference purposes.