



CONFLICT OF INTEREST DECLARATION FORM (EMPLOYEES)

(For Internal Use Only)

I hereby declare Conflict of Interest (COI) as follows:

- | | | | | | |
|---|---|--------------------------|---|---|--------------------------|
| A | Dealings with Suppliers, Customers and Agents | ☐ | F | Investment Activities | ☐ |
| B | Personal Dealings with Suppliers and Customers | ☐ | G | Support Letters | ☐ |
| C | Outside Employment and Activities Outside the Group | ☐ | H | Dealing with Competitors | ☐ |
| D | Board Membership | ☐ | J | Dealing with Business Partners and other possible conflicts | ☐ |
| E | Family Members ¹ and Close Personal Relationship | ☐ | | | |

Please state details:

(Signature)

(Date)

Name:

Designation:

Company:

¹ Family Members shall include the Director's or Employee's spouse(s), children (including step-children and adopted children), parents, step-parents, siblings, step-siblings, grandparents, grandchildren, in-laws, uncles, aunts, nieces, nephews, and first cousins, as well as other persons who are members of your household.



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PARTY CONSULTED

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

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(Signature)

(Date)

Name:
Designation:
Department:
Company:

APPROVAL

I have reviewed the COI 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:



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TESTS FOR IDENTIFYING A CONFLICTED SITUATION

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

[Refer to the 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 Employee in question have job-relevant personal interests that interfere 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 Employee has job-relevant personal interests. Conclusion: <u>Conflicted situation</u>
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 due to among others, prevailing relationships or interests of the Employee. Conclusion: <u>Non conflicted situation</u>
Option 3:	No, the Employee has no personal interests which are job-relevant at the present moment or foreseeable future. Conclusion: <u>Non conflicted situation</u>

Note:

The above guidance is intended to assist Employees to assess whether the COI is a conflicted situation. If in doubt, please contact Group Compliance at cobc@sdguthrie.com