



CONFLICT OF INTEREST DECLARATION FORM (EMPLOYEES)

(For Internal Use Only)

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

- | | | | |
|---|--------------------------|---|--------------------------|
| A Dealings with Suppliers, Customers and Agents | <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"/> | H Dealing with Competitors and other possible conflicts | <input type="checkbox"/> |

Please state details:

(Signature)

(Date)

Name:

Designation:

Department:

Company:



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PARTY CONSULTED

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]*

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(Signature)

(Date)

Name:
Designation:
Department:
Company:

APPROVAL

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:



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TESTS FOR IDENTIFYING ACTUAL OR POTENTIAL CONFLICTS OF INTEREST

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: The Employee has <u>actual conflict of interest.</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: The Employee has <u>potential conflict of interest.</u>
Option 3:	No, the Employee has no personal interests which are job-relevant at the present moment or foreseeable future. Conclusion: The Employee has <u>no conflict of interest.</u>

Note:

The above guidance is intended to assist Employees to assess whether there is any potential or actual conflict of interest. If in doubt, please contact Group Compliance at cobc@sdguthrie.com