

	Division	Version No 1	Policy No
	Department/Section	Revision Date	Effectivity Date
Page No. 1 of 2	Process Name CONFLICT OF INTEREST POLICY	Initiated By	Approved By

I. Purpose

The Company adopts this CONFLICT OF INTEREST POLICY (the “Policy”) to set requirements for all directors, officers and employees to observe the highest degree of transparency, selflessness and integrity in the performance of their duties, free from any form of conflict with personal interest.

II. General Policies and Guidelines

1. A “conflict of interest” exists when a director or an officer of the Company:
 - a. Supplies or is attempting or applying to supply goods or services to the Company;
 - b. Supplies or is attempting to supply goods, services or information to an entity in competition with the Company;
 - c. By virtue of his office, acquires or is attempting to acquire for himself a business opportunity which should belong to the Company;
 - d. Is offered or receives consideration for delivering the Company’s business to a third party;
 - e. Is engaged or is attempting to engage in a business or activity which competes with or works contrary to the best interests of the Company; or
 - f. Such other acts or situations similar to the foregoing.

2. With respect to the directors, the Company’s policy as set out in its Manual of Corporate Governance is that a director should conduct fair business transactions with the Company and ensure that his personal interest does not conflict with the interests of the Company. He should avoid situations that may compromise his impartiality. If an actual or potential conflict of interest may arise on the part of a director, he should fully and immediately disclose it and should not participate in the decision-making process. A director who has a continuing material conflict of interest should seriously consider resigning from his position. A conflict of interest shall be considered material if the director’s personal or business interest is antagonistic to that of the Company, or stands to acquire or gain financial advantage at the expense of the Company.

3. With respect to directors and officers (including spouses/children/siblings/parents), the Company as a general rule, discourages transactions with officers and/or directors and their spouses/children/siblings/parents. Where such a transaction arises, the Company takes deliberate care in ensuring that the same fosters no conflict of interest, and is not prejudicial to the Company. Material transactions of such nature should be duly disclosed to the Board for the latter’s scrutiny and approval. Disclosure obligations required by law and relevant regulation should also be duly complied with by the Company.

	Division	Version No 1	Policy No
	Department/Section	Revision Date	Effectivity Date
Page No. 2 of 2	Process Name CONFLICT OF INTEREST POLICY	Initiated By	Approved By

4. With respect to employees of the Company, senior management and employees alike, the Company requires the disclosure of their direct and indirect shareholdings, relatives and affiliates, transactions and other relevant interests through a Conflict Of Interest Disclosure Form for employees.

III. Effectivity

This policy shall take effect on the date indicated above and shall supersede any and all previous practices contrary to the provisions herein. It shall remain in full force and effect until amended in writing with the approval of authorized signatories.