

Policy Name	Conflict of Interest (COI)
Policy Type	Group Policy
Document Number	SKtes-GRPCOM-COM- 001

1. POLICY STATEMENT

- 1.1. SK tes requires all employees to declare all / any known Conflict of Interest and correspondingly recuse themselves from such situation or transaction.
- 1.2. All (any) situations where Conflict of Interest presents shall be timely reviewed, appropriately managed and recorded to maintain business integrity and fairness (of the transaction).

2. DEFINITION

Declare refers to notifying the Compliance Department to seek evaluation and / or approval for a transaction, arrangement or relationship.

ECC refers to the Ethics and Compliance Council.

Inform refers to notifying the Compliance Department purely for (their) information and record. Approval is not sought, necessary or required.

3. POLICY

- 3.1. Employees have the sole and inherent responsibility to Declare (report) any known, potential or perceived COI to the Compliance and Audit Department.
- 3.2. All reported or known COI situations shall be promptly reviewed, managed or de-conflicted accordingly.
- 3.3. Employees (themselves) may be interviewed or consulted during the review process and reserve the right to escalate the matter to the ECC if they deemed the resolution unsatisfactory.
- 3.4. Employees can renew their declaration during the Annual exercise. Ad hoc or additional declarations must be made upon realizing the COI situation, which can take place at any time.
- 3.5. Enhanced COI process, i.e. requesting further information, may apply to selected employees due to the nature of their work or when they are involved with certain transactions.



- 3.6. The following are some situations where Conflict of Interest (COI) declaration must be made.
- A. Have a spouse or family members working together / in SK tes.
 - B. Holding outside Employment – part time (casual), full time, contract or seasonal.
 - C. Holding Company Directorship, except / unless appointed by SK tes.
 - D. Holding Company Ownership (more than 50%), except / unless obtained through stocks in the open market.
 - E. Had filed for Bankruptcy or in a position of Indebtedness.
 - F. Receive a gift, meals or entertainment with values more than SGD 100*.
 - G. Offer a gift, meals or entertainment with values more than SGD 100*.
 - H. Receive or offer a favor or promise to anyone.
 - I. When you are in a position to approve or influence a business decision or transaction in SK tes that enables or leads to a beneficial outcome for you (as a non-Employee / private capacity), your friend(s), spouse, or family members, which may otherwise not be possible.

** In a single transaction; from or to any third party – non-Employees. Does not apply to gifts obtained through raffle, or from / to Employees (including managers).*

- 3.7. The Compliance and Audit Department may review any disclosed or undisclosed COI on its own and execute relevant management plans or resolution action after consulting the ECC.
- 3.8. Employees shall Inform (the Compliance and Audit Department) through this process, if they are holding any political office.

4. OTHERS

- 4.1. Declaration, general queries and reporting of violation
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