



SEVEN YIELD HOLDING PTE. LTD.

Conflicts of Interest Policy

1 INTRODUCTION

- 1.1 Employees of Seven Yield Holding Pte. Ltd., and its subsidiaries (the "**Seven Yield Group**" or the "**Group**") have a duty to avoid potential conflicts of interest (including situations where there may be a perception of a potential conflict) and, if a potential conflict does arise, a duty to report it.
- 1.2 Personal conflicts of interests can occur (or be perceived to exist) where an employee's personal interests or activities could impair their ability to make objective and unbiased business decisions and/or interfere with their responsibilities as an employee. The Group recognises that conflicts of interest can have a significant damaging impact on an employee's integrity, and on the interests of the Group.

2 WHO DOES THIS POLICY APPLY TO?

- 2.1 The policy applies to the Group, its directors and employees. This policy is also relevant to any person who is associated with the Group who performs a service for, or on behalf of, the Group.

3 WHAT IS A CONFLICT OF INTEREST?

- 3.1 A conflict of interest is a situation where an employee's personal interest, relationships, influences or activities may conflict with, or otherwise interfere or compromise their obligations to the Group, the interest of the Group, or an employee's ability to make an objective judgment or business decision on behalf of the Group.

4 EMPLOYEES' OBLIGATIONS

- 4.1 All Seven Yield's Group employees and officers shall ensure that personal interests do not compromise, nor appear to compromise, the employee's obligations or duties to the Group, or the ability to make objective judgments and business decisions on behalf of the Group.
- 4.2 All employees and officers of the Group shall therefore seek to avoid any actual conflict of interest arising wherever possible. If that is not possible then the employee must notify their line manager of any potential or actual conflict of interest situation as soon as possible.
- 4.3 Once declared, it may be possible for the Group to manage a potential conflict of interest. However, an employee's failure to notify the Group of any such potential or actual conflict of interest situation could result in disciplinary action.
- 4.4 Any employee or officer who becomes aware of a potential or actual undisclosed conflict of interest, must notify their line manager as soon as possible.

5 OTHER OBLIGATIONS

- 5.1 Employees and officers are expected to disclose any family and/or other personal relationships that might (or might be perceived to) affect their business decisions or activities.
- 5.2 No employee or officer should have direct or indirect responsibility for any Group relationship with a business partner, contractor, customer or supplier where family and/or personal relationships exist, or where there may be any other potential or actual conflicts of interest.
- 5.3 Employees and officers should not hold any investment (whether by shareholding or otherwise) directly or indirectly in an entity or company, or be an officer or director of any such entity or company which is a competitor, contractor, customer or supplier of the Group which may damage, or appear to damage, the Group's interests without prior consent.
- 5.4 Employees and officers should not engage in any activity outside work which competes with the Group's current or future business interests.
- 5.5 The exchange of gifts, hospitality or entertainment must comply with the Group's Anti-Bribery Policy.

6 DISCLOSURE

- 6.1 It is the duty of all employees and officers to disclose any actual or potential conflict of interest. If in doubt, any employee who believes that there may be an actual or potential conflict of interest should consult with their line manager.
- 6.2 Conflicts of interest should be reported to the Group's Compliance Officer and a register of conflicts will be maintained by the Group.
- 6.3 After appropriate evaluation, the Group may determine that the relevant disclosed personal interests show no conflict or apparent conflict and are acceptable without further review. Alternatively it may be determined that additional investigation is required and any employee must co-operate with any such investigation.
- 6.4 If circumstances change, and a notified conflict of interest no longer exists, that change should be notified to the Group, and recorded in the register.

7 BREACHES OF THIS POLICY

- 7.1 Failure to notify an actual or perceived conflict of interest shall be a disciplinary issue, and shall be subject to the Group's disciplinary processes.

8 REVIEW AND ONGOING MONITORING

- 8.1 This policy will be monitored and reviewed and may be subject to change as and when a need is identified, or if required by legislation.

9 CONTACTS

Compliance Officer

Tan Shirley

TEL: +65 9747 8687

Email: shirley.tan@sevenyield.com