



## Conflict of Interest Policy

This Policy and the associated Conflict of Interest Guideline (**Guideline**) provide guidance in respect of the identification, declaration, and management of actual and potential Conflicts of Interest throughout T&G.

Conflicts of Interest may arise where:

- An employee or Director of T&G could place their personal interests before the interests of the Group (including where such personal interests unduly influence the employee's / director's business judgments, decisions, or actions);
- There is an overlap between the individual's personal interests and the interests of T&G (even when the situation appears to be in the best interest of both parties).

## Scope

This Policy is a group-wide policy and shall apply to T&G Global Limited (the **Company**) and its majority-owned or controlled subsidiaries (together **T&G** or the **Group**).

## Procedure

All Directors and employees are ultimately accountable for recognizing situations in which a Conflict of Interest has or might occur. Conflicts of Interest must be reported in accordance with the requirements of this Policy and the Guideline.

The associated Guideline is intended to assist employees and Directors to deal with Conflicts of Interest in a consistent and appropriate manner.

### *Identification of a Conflict of Interest*

A Conflict of Interest can exist even when no actual conflict exists (e.g. where it appears to be beneficial to both parties). Through listing some examples, the Guideline will help employees and Directors with the **Identification of a Conflict of Interest**.

### *Declaration of a Conflict of Interest*

As a principle, every employee and Director should avoid situations that may result in a Conflict of Interest or the appearance of a Conflict of Interest. The required action for employee or Director who cannot avoid a Conflict of Interest is to make a **Declaration of Conflict of Interest**.

### *Declaration of a Conflict of Interest*

Once a real or potential Conflict of Interest has been identified and declared, management or the Board of Directors (as applicable) has the responsibility of **Managing the Conflict of Interest**.

### *Expectations and Strategies*

The Guideline describes the **Expectations with respect to Management** of the Conflict of Interest and suggests various **Strategies** that may be appropriate in managing the Conflict of Interest.

For **Directors**, interest registers exist and are confidentially maintained by the T&G Risk team.

Potential Conflicts of Interests involving employees and directors of a subsidiary will be managed by the CEO and CFO of the Company.

## Dependencies

- Conflict of Interest Guideline;
- Gifts and Hospitality Policy;
- Anti-Corruption and Bribery Policy.

## Review and Approval

The Board and FRIC has reviewed and approved this Policy and supplementary Guideline as per the Policy updates table below.

The Risk & Compliance team will regularly review this Policy and update where required, with the latest update made as per the Policy Update section below and in accordance with the changes made to the supplementary Guidelines. The Risk & Compliance team has responsibility for maintaining the conflict of interest register.

## Further Information

For further information please refer to the Head of Risk & Compliance.

## Policy Updates

Date of approval	Approver	Amendments completed by	Details of changes
August 2023	FRIC	Bianca Verbeek	Review with no changes to the content
15 Dec 2020	FRIC	Bianca Verbeek	Change of responsibilities for maintenance of the interest register with approval by the FRIC and Board
3 August 2017	FRIC	Bianca Verbeek	Development Policy and Guideline with approval by the FRIC