



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), effective from 03.08.2017.

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.

Authorities

- T&G Board of Directors: Authority to approve changes to this Policy;
- Risk Team: Policy owner and responsible for maintaining the interest register.

Dependencies

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

Approval

The Policy was initially approved by the FRIC on 03.08.2017, with updates approved by the T&G Board of Directors on 15 December 2020.

Further Information

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

Policy Updates

Date	Name	Update Made
03/08/2017	Bianca Verbeek	Development Policy and Guideline
15/12/2020	Bianca Verbeek	Change of responsibilities for maintenance of the interest register