



## Conflict of Interest Declaration (2021)

Name: \_\_\_\_\_

Role: \_\_\_\_\_

Dept.: \_\_\_\_\_

My Manager: \_\_\_\_\_

*What is Conflict of Interest?*

*Conflict of interest is any situation that can prevent impartiality or create bias in a person. This failure of objectivity exists when there is a possible conflict between the person's self-interest and the interest of a business or the public.*

*It could also be a situation in which a person can derive personal benefit from the actions or decisions taken upon that situation. It does not mean that a person is taking the wrong action or decision in the specific situation addressed; it means that there is an opportunity for this person to be biased due to the conflict of interest.*

*Conflict of interest can also be understood as a situation in which two different parties' concerns or desires are not compatible. Even though the incompatibility may come from purely business desires in this situation, it is vital to understand the rationale and address it appropriately.*

*If a conflict of interest is identified in a business setting, the person or the company in question might become unreliable because of a clash of personal and professional interests. If this person or company has a vested interest, it might be tempting to be biased when making decisions.*

CCS JV requires you to make reasoned and impartial decisions in the workplace. Conflicts of interest can affect your decision-making and may adversely affect CCS JV and its shareholders.

Conflicts of interest can arise through outside employment interests, financial participation in an outside business, customer and supplier relations, and gifts and entertainment.

You have a conflict of interest when your actions or your private interest interfere in any way – or even appears to interfere – with the CCS JV interests.

Conflicts of interest expose our judgment and that of CCS JV to increased scrutiny and criticism and can undermine our credibility and the trust that others place in us.

A conflict situation can arise when you take action or have an interest that makes it difficult to perform your work objectively and effectively.

Conflicts can arise not only when you personally benefit or gain, but also when other persons (including family members) or organizations with which you have ties stand to gain.

In general, if a potential conflict of interest exists, you must excuse yourself from making any decisions about the issue at hand, disclose the relevant facts in writing, and explain the possible conflict to your immediate supervisor, or Human Resources, Legal or Compliance personnel. Also, obtain required approvals before making any such decisions or taking any actions that may appear to be a conflict of interest.

### **Key Requirements:**

Avoid all activities that conflict or appear to conflict with those of the Company and disclose such interests/situations, which exist. Suppose you or any of your immediate family members have any direct or indirect financial or other participation in any business which competes with your employer. Is a supplier of goods or services to, or is a customer of CCS JV or one of the shareholder companies? If so, you must disclose such conflict to CCS JV and receive written management approval before any business is transacted with such business.

**Customer and Supplier Relations.** Any relationship between you and a customer or supplier must in no way compromise your ability to transact business on a professional, impartial and competitive basis or influence business decisions made on behalf of CCS JV.

**Gifts and Entertainment.** For purposes of our Code of Ethics and our Gifts and Hospitality Procedure, gifts and entertainment have the broadest possible meaning, including gifts, trips, services, entertainment and any other gratuitous item, event, benefit or thing of value. You must not give or receive gifts of any value under circumstances that are unlawful or might otherwise appear to be an attempt to improperly influence a decision, which may affect the business and/or reputation of CCS JV.

**Corporate Opportunities.** Employees are prohibited from taking personal advantage or gain from opportunities discovered through the use of CCS JV's property, information or commercial relationships.

**Contributions.** Contributions. Suppose you are involved in decisions to donate CCS JV assets, including money, goods-in-kind or services. In that case, you must disclose any personal benefit that you or your family members may receive as a result. Generally, all CCS JV's donations must be characterized as charitable, industrial or Political Contributions in the CCS JV's books and records, and approved in advance.

Conflicts of Interest tend to be fact-specific; thus, it is difficult to define every possible conflict situation. If you feel that a potential Conflict of interest may exist, consult with your supervisor, Compliance Manager, or Legal department. You must disclose any potential conflicts at your earliest opportunity.

Violating this policy will subject you to disciplinary action up to and including termination of employment.

### **Tips**

- Refer to the CCS JV's **Code of Ethics, Management System Guideline Anti-corruption** (MSGGR-CCSJV-ANC-001-E) and **Gifts and Hospitality Procedure** (STD-GR-CCSJV-ANC-001-E) to ensure full compliance.
- Avoid any situation, activity or investment, which may affect or appears to affect your ability to exercise impartial judgment on the job or adversely affects the CCS JV's interests.
- Using CCS JV's information that is not available to the public either for personal profit or in a way that adversely affects the CCS JV is **strictly prohibited**.

- Avoid committing time to an outside activity, which affects or might affect your job performance adversely.
- Conducting business for personal gain using CCS JV property, information or commercial relationships is **strictly prohibited**.
- Avoid gain or perceived gain at the CCS JV's expense through other parties or entities.

**Declaration:**

I declare that I have read the information mentioned above and understand the contents of the CCS JV procedures and my obligations under the said procedures. I declare that I am not aware of any conflict of interest, affecting my ability to execute my role and responsibilities in any manner.

Signed: \_\_\_\_\_ Date: \_\_\_\_/\_\_\_\_/2021