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BUSINESS ETHICS & CODE OF CONDUCT

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COVERAGE OF THIS BUSINESS ETHICS & CODE OF CONDUCT

The expectations of the Board on how Directors and employees of Lotte Chemical Titan Holding Berhad (“LCT”) and its Malaysian operating subsidiaries (collectively referred to as “the Group”) are to conduct themselves in the daily course of our work are clearly set out in this Business Ethics & Code of Conduct (“BECOC”). Whilst the BECOC is specifically written for our Directors and employees, we expect all parties that transact and conduct business with the Group to know our principles and conform to the spirit of these standards.

The Legal, Co-Sec & Compliance team (“Legal & Compliance team”) shall be the custodian of the BECOC and the Human Resource Department shall be responsible for presenting and disseminating this BECOC to all employees of the Group whilst the respective Group secretaries within the Group shall bear this responsibility in the case of dissemination to Directors.

MESSAGE TO EMPLOYEES

The Group will meet its’ moral and social responsibilities towards the community at large and the environment in which it operates. As a responsible corporate citizen, the Group, in the pursuit of its corporate goals, requires all employees to undertake the Group’s business activities in a responsible and ethical manner and in compliance with all applicable laws, rules and regulations. All employees are required to operate to conform to high standards of business integrity and ensure that the standards are never compromised for the sake of results.

This BECOC will:

- Enhance the Group’s reputation for fair and responsible dealing.
- Provide an overview of the Group’s ethical standards.
- Set out the ethical principles and guidelines required to maintain a high standard of behavior.
- Promote a healthy organizational culture that is conducive to the realization of individual potential and the Group’s goals.
- Develop pride among staff that the Group is a responsible corporate citizen.

We strongly urge all employees to commit themselves to consistently applying high ethical standards when conducting personal and Group activities in order that our individual and corporate goals can be achieved together.

President & CEO



Jang Seon Pyo

GENERAL RULES OF CONDUCT

This BECOC sets forth the fundamental policies and rules there under which are applicable to all Directors and employees of the Group. All employees of the Group are expected to understand, support and comply with these policies and rules, both individually and collectively within their respective department and business unit.

Policies and rules for the acceptable conduct of all employees are necessary for the benefit and protection of the rights and safety of all employees and the orderly operations of the businesses of the Group. These policies and rules delineate the perimeters of “what ought to be done” and “what ought not to be done” in order to define what is an “acceptable conduct” in the Group. Failure to abide by these policies and rules can lead to disciplinary actions by Management, including, but not limited to, dismissal.

ACTION ITEM: At the end of each year all employees must certify that he/she is in compliance with this BECOC, that all employees who report to him/her is unaware of any violations of this BECOC by others that have not been already addressed. The **ANNUAL DECLARATION OF COMPLIANCE WITH THE BUSINESS ETHICS & CODE OF CONDUCT** to be signed is available in the Intranet. Failure to abide by these policies and rules can lead to disciplinary actions by Management, including, but not limited to, dismissal.

ADMINISTRATION

This BECOC is formulated by taking into account the following laws and regulations, including **Malaysian Anti-Corruption Commission Act 2009, Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities 2001, Main Market Listing Requirements of Bursa Malaysia Securities Berhad (“Listing Requirements”)** and **Malaysian Code on Corporate Governance**.

Where there is a conflict between the contents of this BECOC and the laws and regulatory promulgations, the relevant enumerations contained in the legislations and regulations shall prevail.

The BECOC shall also be read in tandem with other governance policies and documents of the Group such as the Delegated Approval Limits, Whistleblowing Policy and Anti-Bribery & Anti-Corruption Manual. In the event of ambiguity concerning the stipulations contained in this BECOC, stakeholders should consult Legal and Compliance team to navigate the attendant issues, rather than disregarding the BECOC without prior consultation.

In this BECOC, words importing one gender include the other gender and words importing the singular include the plural and vice versa, as the case may be.

1.0 Definitions

For the purposes of this BECOC, unless otherwise is stated, the terms listed below represents its respective definitions:

“Board”	The Board of Directors of the respective entities within the Group.
“BECOC”	Business Ethics & Code of Conduct.
“Confidential Information”	<p>Refers to all non-public information entrusted to or obtained by a Director or employee by reason of his position with the Group. It includes, but is not limited to, non-public information that might be useful to competitors or harmful to the Group or its clients if disclosed, such as:</p> <ul style="list-style-type: none">(a) non-public information about the Group’s financial condition, prospects or plans, trade secrets, business concepts, its marketing and sales programs, research and development information, as well as information relating to mergers and/ or acquisitions and divestments;(b) non-public information concerning possible transactions with other companies or information about the Group’s clients, suppliers or joint venture partners that the Group is under an obligation to maintain as confidential; and(c) non-public information about a Director, employee or client as well as discussions and deliberations relating to business issues and decisions between and amongst Directors and employees.
“Conflict of Interest”	Where personal interests and relationships impair or appear to impair the independence of any judgement in which, the Director or employees may need to exercise in discharging his duties to the Group. It could also arise in situations where an individual is in a position to take advantage of his role in the Group for his personal benefit, including the benefit of his family members or close acquaintances. This would undermine the duties of good faith, fidelity, diligence and integrity as expected by Group from its Directors and employees in discharging their duties and obligations.
“corruption”	Refers to an act of giving or receiving of any gratification, bribe or reward in the form of cash or in-kind of value for performing a task in relation to his or her job description.
“Director(s)”	Means the Director(s) of the Group in accordance with the definition provided in the Companies Act 2016 .

“employee”	Refers to a person who accepts a form of remuneration from the Group in exchange for services performed to or on behalf of the Group, either on a permanent, temporary, assignment, or secondment basis. Where an employee is employed on a contractual basis and the terms of the contracts differs materially from the provisions in the BECOC, the terms of the contract prevails.
“Facilitation payment”	Any form of payment made to a person or a Group in order to facilitate, expedite and/ or secure the interest of the giver or persons connected to the giver through the performance of a routine or administrative duty or function.
“Family members”	Refers to persons who falls within any one of the following categories: (a) spouse; (b) parent including parent in-law, grandparents and grandchildren; (c) child including adopted child and step-child; (d) brother or sister, nieces, nephews, uncles, aunts, cousins and any persons related through adoption and legal guardianship; and (e) spouse of the person referred to in subparagraphs (c) and (d) above.
“Group”	Collectively refers to Lotte Chemical Titan Holding Berhad and its Malaysian operating subsidiaries.
“gift(s)”	Refers to something that is bestowed voluntarily and without any form of compensation and shall constitute money, donation, loan, fee, reward, valuable security, goods, services, movable or immovable property, interest or use of the Group’s facilities or property that may provide any other similar advantage or benefits. The definition shall include but not be limited to the following: (a) any office, dignity or titles, contract of employment or services, and any agreement to give employment or render services in any capacity; (b) any payment, release, discharge or liquidation or any loan, obligation or other liability, whether in whole or in part; (c) any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage; (d) any forbearance to demand any money or equivalent; (e) any other service or favours of any description, such as granting any favourable terms outside the ordinary course of business without prior approval from the Board, protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty;

	(f) any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs; and
	(g) any cash or cash equivalents in the form of vouchers, discounts, coupons, shares or bonds and commission etc.
“Intellectual Property”	Refers to inventions, copyrights, patents, trademarks, branding and technology, and industrial designs owned by the Group.
“MACC”	Malaysian Anti-Corruption Commission.
“Money laundering”	Refers to any act or attempted act to conceal or disguise the identity of illegally obtained proceeds and passing it through legitimate business channels so that they appear to have originated from legitimate sources.
“Public Statement”	Refers to the making of any statement or comment to any media (electronic and/ or print), the internet and speaking engagements. It also applies to every kind of correspondences with the media in print or electronic form as well as through social media channels.
“Report”	Refers to the report made through the channels as provided in the Group’s Whistleblowing Policy .
“stakeholders”	Refers to any individual, group, or party that has a direct or indirect interest in an organisation and the outcome of its actions and which may include (but are not limited to) Directors, employees, current or prospective customers, contractors, suppliers, governmental bodies, non-governmental organisations.
“stakeholder relation engagement”	Refers to any kind of engagement between the Group and its stakeholders and which may include (but are not limited to) the giving and receipt of meals, hospitality, gifts, sponsorship, donations, participation at sports, theatre and cultural events.
“Third Party/Parties”	Refers to parties who are external persons or companies independent of the Group, which may include customers, potential customers, contractors, suppliers, enterprises and any other stakeholders with whom LCT has a business relationship, whether current or prospective.

2.0 Reporting of Unethical or Illegal Conducts

- 2.1 The Group aims to promote high transparency, accountability and good corporate governance in the workplace. It is the Group’s priority to encourage and ensure that all employees adhere to all applicable laws and regulations as well as the Group’s policies. The Group recognises that there will be instances where misconducts will occur and therefore, sufficient and effective controls are needed to be in place to minimise such instances.

- 2.2 In an attempt to minimise such instances, the Group encourages all stakeholders of the Group to raise concerns about possible improprieties or misconducts during work. The Group discloses in detail the types of improprieties or malpractices that should be reported, the procedures and channels for reporting as well as the outcome of such Report in the Group's "**Whistleblowing Policy**".

3.0 Responsibility to Shareholders

- 3.1 Employees shall endeavor to increase and add value to the shareholders. All employees shall do their best for the maximization and protection of the shareholders' interest with long term view and strategic management.

- Based on creative thinking and through continuous innovation and improvement activities, positively cope with the changes in market conditions, regulations of related countries and foreseeable future.

- 3.2 Employees shall endeavor to keep the books and records correctly and transparently.

- It is the responsibility of all employees to ensure that all our business books and records are accurately maintained. In all aspects of our business, we expect our employees to adhere to the highest standards of honesty and not to engage in inaccurate, false or misleading record keeping. You are strongly discouraged from making any inaccurate representation, whether in writing or verbal. This should also be applied to situations where you might believe that the consequences of the inaccuracy would be harmless.
- All of the Group's fund or asset must only be utilised for lawful business or business-related purposes. No undisclosed or unrecorded fund or asset of the Group shall be established for any other purpose whatsoever.

No false, misleading or artificial entries should be made in the business books and records of the Group or any of its Malaysian operating subsidiaries for any reason whatsoever. Employees must never participate or support any such arrangement whatsoever.

4.0 Abuse of Power

- 4.1 Abuse of power is the improper use of influence, power or authority by an individual towards another. This is particularly serious when the alleged offender tries to misuse his influence, power or authority to negatively influence the career or employment conditions (including but not limited to appointment, assignment, contract renewal, performance evaluation or promotion) of another. This scenario typically occurs when one party is of higher position or supervisor of another and can be a one-off incident or series of incidents. Abuse of authority may also include misuse of power that creates a hostile or offensive work environment, which includes but is not limited to the use of intimidation, threats, blackmail or coercion.

- 4.2 All employees shall:
- a) be respectful to their colleagues and maintain the highest standards of conduct and necessary confidentiality;
 - b) maintain a harmonious working environment for other colleagues by behaving in a manner which is free of intimidation, hostility, offence and any form of harassment, sexual harassment or abuse of authority;
 - c) understanding of conduct which constitutes harassment, sexual harassment or abuse of authority; and educate themselves through mandatory as well as optional training;
 - d) be aware of the various options and internal channels available to them for addressing harassment, sexual harassment or abuse of authority;
 - e) refrain from all forms of retaliation.
- 4.3 All employees, regardless of designation or position should be treated with respect and dignity and that abuse of power and any form of discrimination will not be tolerated. Employees shall report incidents of abuse of power or has reason to believe an abuse of power situation is occurring, to their immediate supervisor or through the channels as outlined in the **Whistleblowing Policy**.
- 4.4 Management can create a better working environment by doing the following:
- a) act as role models by upholding high standards of conduct in order to achieve a harassment-free environment;
 - b) facilitate, inspire and help to create a harmonious working environment free of intimidation, hostility, offence and any form of harassment, sexual harassment and abuse of authority;
 - c) communicate the Group's policy on harassment, sexual harassment and abuse of authority to all employees; and be available to provide guidance on prevention and dealing with such form of misconduct;
 - d) ensure that incidents of harassment, sexual harassment or abuse of authority are promptly and adequately addressed. In such cases, managers and supervisors must demonstrate fairness, impartiality, respect for confidentiality and be free from intimidation or favouritism;
 - e) take all necessary measures to prevent and address retaliation;
 - f) take all necessary actions to prevent staff members and non-staff personnel who supervise others from engaging in harassment, sexual harassment or abuse of authority. Management and Human Resource Department shall also take measures consistent with the present policy should they witness any acts of harassment, sexual harassment or abuse of authority.

Failure of an employee or management to promote and maintain a respectful work environment or to assist in enforcing established standards of conduct may result in appropriate administrative or disciplinary action.

5.0 Insider Trading

- 5.1 All Directors, employees and their Family members are required to comply with the applicable laws and regulations on insider trading, including restriction in dealing with publicly traded securities of LCT at all times, whilst in the possession of material non-public information or price sensitive information, until such information is generally available to the public.
- 5.2 In accordance to **Section 188(2) of the Capital Markets and Services Act 2007**, Directors and employees of the Group, including their Family members, shall not deal in shares of any entity listed or pending listing on a stock exchange at any time when he is in possession of information. This information could be obtained as a result of his directorship or employment by, or his connection with the Group which is not generally available to the public, and which, if it was so available, would likely bring about a material change in the market price of shares or other forms of securities of the entity concerned or affect the decision of a shareholder or investor.
- 5.3 The Directors and employees of the Group shall at all times safeguard all Confidential Information of the Group and shall never use it to trade in shares or other securities of LCT or recommend or cause a Third Party to do so as prohibited by **Section 188(3) of the Capital Markets and Services Act 2007**. Unless authorised, Directors and employees shall only disclose such information by any order of any court or competent jurisdiction or any competent judicial, governmental or regulatory authority. Breach of insider trading laws and regulations can result in severe criminal penalties, as spelt out in **Section 188(4) of Capital Markets and Services Act 2007** as well as civil actions by the affected parties.
- 5.4 All Directors and employees of the Group shall abide by the applicable securities laws and regulations and avert relevant breaches, which include false trading, market rigging, market manipulation, fraudulent and misleading trading, electronic crime and dissemination of false information.

6.0 Anti-Money Laundering/ Anti-Terrorism Financing

- 6.1 Directors and employees of the Group are prohibited from being involved in money laundering and terrorism-financing activities as enshrined in the applicable Anti-Money Laundering/Counter Financing of Terrorism (“AML/CFT”) laws and regulations including the **Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities 2001**.
- 6.2 The following are some example indicators of Money laundering and terrorism financing:
- Requests for payment amounts that differ from the milestones stated in the contract;
 - Currency of payment that differs from that stated in the contract;
 - Mode of payment used is outside the course of normal business practice; and
 - Payments to/from parties that are not the contracting parties.

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- 6.3 Directors and employees shall ensure that care and diligence are undertaken in the receipt and remittance of money through the performance of checks to identify discrepancies and red flags such as those highlighted in Clause 6.2 above.
- 6.4 It is the duty of every Director and employee to inform the Legal and Compliance team of the Group immediately should they detect or suspect any violations of the applicable AML/CFT laws in the course of their service with the Group. Any Director or employee who is found to be engaging or assisting in Money laundering activities may face criminal proceedings being instituted against them in accordance to the laws applicable on anti-money laundering.

7.0 Anti-Corruption and Bribery

- 7.1 Directors and employees shall not, in any circumstances, be involved in any form of acts of corruption or bribery, either directly or indirectly as follows:
- give or receive any form of gratification including agreeing to accept or attempting to obtain, from any party, for themselves or for any other party;
 - give or receive gifts, stakeholder relation engagements and/or sponsorship not in accordance to the Group's policies as well as any applicable anti-corruption laws;
 - abuse of power; and
 - make false claims by themselves or through a Third Party with intent to deceive or mislead.
- 7.2 Directors and employees shall not, in any circumstances, give or offer to give any bribe or gratification to any party as an incentive or a reward for doing or forbearing to do, or for having done or forborne to do any act in relation to Group's affairs or businesses, or for showing or forbearing to show favour or disfavour to any person in relation to Group's affairs or businesses.
- 7.3 Directors and employees shall refrain from any activity or behaviour that could give rise to the perception or suspicion of any corrupt conduct or the attempt thereof in their official capacity as well as well as outside of work so as to protect the good name of the Group.
- 7.4 Directors and employees shall not, accept or obtain, directly or indirectly, any commission, discounts, secret profits or any other benefit (cash or in-kind benefits) in respect of any goods or services sold or purchased or other businesses with the Group.
- 7.5 Directors and employees shall not provide Facilitation payment to any local or foreign officials with a view of expediting a routine business action for the Group. Any requests for Facilitation payment should be refused and reported immediately to your superior and the Legal & Compliance team.

7.6 Directors and employees shall not use their position for any gratification or benefits, whether for themselves, Family members, or any persons with close personal relationship, when making business decisions for the Group, in which they have interest in, directly or indirectly.

Please refer to the **Anti-Bribery & Anti-Corruption Manual** for further guidance on prohibition on Facilitation payments and corrupt activities.

8.0 Stakeholder Relation Engagements

8.1 As a general principle, the Group practices a “No Gift Policy”.

8.2 Group makes an exception on the said general principle, listed below:

	Exceptions	Guidelines
1.	Group President & CEO’s exemption on giving or receiving gifts or on any stakeholder relation engagements	i. Not exorbitant and given or received without corrupt intent
2.	Special circumstances for the giving or receiving gifts: a. Festive seasons; or b. Where refusal of such gifts might be taken as a gesture of disrespect	i. Generally, perishable gifts such as fruits, flowers and food; ii. Not exorbitant and given or received without corrupt intent; and iii. Maximum limit for each gift is RM500.
3.	Exchange of gifts at organisational level during official visits or courtesy calls	i. Such gifts given, if possible, should bear the Group’s or company’s logo; ii. Not exorbitant and given or received without corrupt intent; and iii. Maximum limit for each gift is RM500.
4.	Gifts given or received at official functions, events and celebrations	i. Such gifts given, if possible, should bear the Group’s or company’s logo; ii. Not exorbitant and given or received without corrupt intent; and iii. Maximum limit for each gift is RM500. Note: Typically, similar gifts or gifts of similar value are given to or received by all attendees.

5.	Sponsorship or donation to some long-standing customers	<ul style="list-style-type: none"> i. Not exorbitant and given or received without corrupt intent; and ii. Internal guidelines on sponsorship and donation are to be observed.
6.	Corporate Social Responsibility (“CSR”) activities	<ul style="list-style-type: none"> i. Conforms to internal guidelines on CSR
7.	Provision and receipt of meals which are infrequent, not solicited, with a legitimate business purpose	<ul style="list-style-type: none"> i. Is moderate or appropriate in the context of the occasion and employee’s position in the Group; ii. Does not create an obligation to the other party; and iii. Maximum limit per individual for each meal is RM250.
8.	Stakeholder relation engagements which are culturally acceptable or practised, not covered by the above exceptions	<ul style="list-style-type: none"> i. Infrequent and unsolicited; ii. Is moderate or appropriate in the context of the occasion and employee’s position in the Group; iii. Does not create an obligation to the other party or influence decision making; and iv. Maximum limit for each engagement is RM500.

8.3 Any offer of gifts or other forms of stakeholder relation engagements from Third Parties, which is not expressly permitted or not in accordance with principles above, or which would exceed or reasonably perceive to exceed the maximum limit should strictly be declined at the onset. If the employee did not have an opportunity to decline at the onset, the employee should thereafter decline or return with a polite note.

NOTE: Any gifts, sponsorship, donations or any other forms of stakeholder relation engagements provided or given to public officials or government agencies should be governed by the Group policies, government guidelines and requires prior approval from the Heads of Departments. Legal & Compliance team may be consulted on the applicable government guidelines.

Please refer to the **Anti-Bribery & Anti-Corruption Manual** for further guidance on the LCT’s No-Gift Policy.

9.0 Dealing with Third Parties

- 9.1 As the Group deals with Third Parties on a regular basis, it is important to ensure that Directors and employees comply with all the applicable laws and regulations pertaining to anti-corruption. The Group adopts zero tolerance towards any act of giving and/or receiving bribes, kickbacks or Facilitation payments.
- 9.2 As the Group values ethics and integrity in all of its business dealings, Third Parties engaged for or on behalf of the Group are expected to adopt the same practices. The following should be adhered to ensure that the Group only engages with Third Parties that share and promote the same values:
- All Third Parties are to be made aware of the Group's policies and what is expected of them; and
 - Avoid business dealings with Third Parties that are suspected of engaging in bribery and other corrupt practices.
- 9.3 LCT reserves the right to terminate any arrangement or contracts with a Third Party, if any employee, agent or affiliate of such Third Party is found to have engaged in any conduct that is in violation of the Group's anti-bribery and anti-corruption policy and the applicable anti-corruption laws and regulations or has been convicted by any court of law under any jurisdiction.

10.0 Protecting the Group's Assets

- 10.1 Directors and employees shall, at all times protect the Group's assets, both tangible and intangible assets from wastage, loss, vandalism or damage, misuse, theft, misappropriation or infringement of Intellectual Property rights and ensure these assets are used in a responsible, legal and prudent manner. Directors and employees shall not misuse the Group's assets for their own personal interest or for the purposes of any illegal activity.
- 10.2 Directors and employees are responsible for the protection of all the assets used in carrying out their responsibilities and for taking reasonable steps to prevent theft or misuse of, or damage to, such property.
- 10.3 Directors and employees shall ensure that all expenditures and usage of funds are made accurately. No secret funds or profit from the Group's money or other assets for unauthorised or unlawful purposes is allowed for any purpose whatsoever. Directors and employees shall also ensure that all expenditures are transacted in a transparent manner and is properly documented.
- 10.4 Directors and employees shall be responsible for all the assets of suppliers/ vendors that are entrusted under their care and Directors and employees shall treat those items with the same level of care as with all other physical properties belonging to the Group.
- 10.5 Directors and employees shall use the Group issued laptops and any mobile devices as directed and shall not use any external and unapproved materials/ software/ hardware or access restricted websites or domains. Directors and employees shall

comply with all the policies related to the usage of computers and information technology and its amendments from time to time.

11.0 Confidential Information

- 11.1 Directors and employees shall hold in confidence all Confidential Information acquired during the term of service or employment with the Group and shall not disclose the same to unauthorised persons.
- 11.2 There are however several exceptions where such disclosures are acceptable/ required:
- Disclosure permitted by law and authorised by the Group; or
 - Disclosure required by law (as a form of evidence during legal proceedings/ bringing to light any breach/ infringements of the law).
- 11.3 All Confidential Information is the property of the Group and must not be disclosed without prior Management approval. All employees, agents, consultants and representatives of the Group must exercise due care to protect such Confidential Information including those received from other parties.
- 11.4 Listed below are some common examples of Confidential Information:
- Ideas, inventions and other developments or improvements within the scope of the Group's business operations or that relate to any of the Group's works or projects.
 - Technical information and improvements on plant equipment, processes, operations and products.
 - Non-public earnings reports and other financial reports.
 - Cost, pricing, marketing or service strategies.
 - Forecasted and actual figures on sales and inventories.
 - Lists of customers and suppliers, procurement plans or product prices.
 - Information related to corporate activities including, but not limited to, joint ventures, strategic alliances, mergers and acquisitions.
- 11.5 When deciding on whether to disclose Confidential Information, factors that should be considered are:
- Such disclosure may affect the interest of all parties (including Third Parties); and
 - Such disclosure is relevant to the recipient and the recipient is authorised by the Group or by law to receive such disclosures.

11.6 All Directors, employees, agents, and representatives of the Group must be aware that any unlawful disclosure of Confidential Information may adversely affect the financial performance as well as cause reputational damage to the Group. The Group is committed to adherence to the **Personal Data Protection Act 2010**.

11.7 ***Specific Guidelines***

- All employees, agents and representatives of the Group are to adhere to the following guidelines: For disclosures to Third Parties, when in doubt, the advice of the Legal and Compliance team should be sought prior to the disclosure, as safeguard measures to be undertaken, to protect the interests of the Group.
- When obtaining Confidential Information from other parties, it is important to ensure that the parties concerned have the legal authority to disclose such information. This is to prevent any legal recourse from being taken against the Group. Employees may seek if necessary prior advice from the Legal and Compliance team in any such matters.
- Confidential Information that has already been obtained from other parties must be safeguarded in accordance with the terms and conditions agreed with the parties concerned. Employees must ensure that the period of non-disclosure is observed.
- Directors and employees are to exercise their judgement and apply relevant safeguards when in possession of Confidential Information so as to avoid unintentional disclosure of such information. A proper conduct and safeguard may include storing all confidential documents in locked cabinets, not leaving Confidential Information visible and unattended, and disposing off Confidential Information in an authorised manner when no longer needed.
- If any of the Confidential Information is retained in the custody of the Directors and employees after ending their service with the Group, the said individual shall take all reasonable steps to promptly repatriate these documents and information to the Group.
- When discussing any Confidential Information, it is prudent for Directors and employees not to discuss such information in the presence or in the close proximity of other persons, not privy to the same.
- Any misconduct of this provision should be reported promptly and any person who fails to comply may face disciplinary action as determined by the Group.
- Directors, employees, agents or representatives of the Group shall not disclose or use any Confidential Information gained during their employment or engagement with the Group for their personal gain or to their advantage.

ACTION ITEM: At the end of each year all employees are required to complete and submit the **“INFORMATION SECURITY PLEDGE – EMPLOYEE CERTIFICATION”** The certification form to be signed is available in the Intranet. Failure to abide by these policies and rules can lead to disciplinary actions by Management, including, but not limited to, dismissal.

12.0 Conflict of Interest

12.1 At all material times, Directors and employees shall avoid any Conflict of Interest situations which may, directly or indirectly, in the course of discharging their duties or outside of work, have the potential to interfere with their objectivity in performing duties or exercising judgement on behalf of the Group:

- receiving or giving of gifts or stakeholder relation engagements as a result of the Director or employee's position with the Group may cause Conflict of Interest situations;
- a Director or employee in a position to influence decisions that are made by the Group with respect to dealings with a business, enterprise or entity owned or partially owned by the employee, the employee's Family member, friend or those with whom he/she has a close personal relationship with; or
- a Director or an employee competing with or against the Group in a business transaction.

References to "conflict of interest" will also include any situations which appear or are deemed by the Management to be of a potential conflict of interest.

12.2 Directors and Management shall abstain from participating in any of the Group's decision making or deliberations where the subject matter in question involves a conflicting matter for the Directors and Management. Directors and Management shall not participate in any activities which could influence the decisions on such dealings.

12.3 As it is impossible to describe every potential Conflict of Interest, it is the responsibility of Directors and employees including Management to exercise good judgement, to seek advice when appropriate and adhere to ethical standards in discharging their duties to the Group.

12.4 Directors and employees including Management shall disclose any conflict with regard to relationship interest or any contractual interest, whether direct or indirect, to the Group as and when it arises in accordance to the Group's policies. The declaration of Conflict of Interest should be made in writing and shall include the fact, nature and extent of conflict as well as relationship between the parties to the appropriate level of management which are as below: -

- For employees, they should report to their immediate superior and copy the Group's Human Resource Department and Legal & Compliance team.
- For Director(s), he shall declare the same to the Board and such declaration shall be documented and he shall also abstain from any deliberations, negotiations, or any other affairs regarding the matter.

ACTION ITEM: At the end of each year all employees are required to complete and submit the "ANNUAL DECLARATION OF CONFLICT OF INTEREST" form. The certification form to be signed is available in the Intranet. Failure to abide by these policies and rules can lead to disciplinary actions by Management, including, but not limited to, dismissal.

13.0 Faithful Service

- 13.1 Under applicable laws, employees are contractually obliged to provide satisfactory job performance and must act faithfully in accordance with the interest of the employers. The employer and employee relationship imply that if by their own acts they are prevented from doing so, the employer may dismiss them.
- 13.2 Employees are strongly advised against taking on any other employment (whether self-employed, part time or otherwise) where such other employment may, directly or indirectly, affect the performance of the employees given that their main employment is with the Group.
- 13.3 References to “other employment” shall refer to any form of arrangement, business, profession, trade or employment other than with the Group, whether inside or outside the employee's normal working hours. Any such form of arrangement, business, trade, profession or employment (whether on a full time or part time basis) shall include, but not limited to, any direct selling, multi-level marketing or other arrangements or undertakings of similar nature, or any commission based or profit-sharing arrangements or undertakings.

14.0 Investigations

- 14.1 It is our policy to fully cooperate with any internal and governmental investigation. Employees should consult Department Head and the Legal and Compliance team in any investigations with respect to the Group or any of the Group's business transactions.
- 14.2 ***Specific Guidelines***
- Do not destroy any documents in anticipation of a request for those documents from investigators. This includes any documents or emails saved on or kept on electronic medium such as disks, back-up diskettes or servers.
 - Do not alter any historical Group document or record.
 - Do not make any untrue, incorrect or misleading statement to any investigator.
 - Do not try to influence any other employees of the Group or any other person to provide untruthful information to any investigation or to provide any incomplete, false or misleading information.

15.0 Global Practices

- 15.1 The Group operates in various countries. The countries in which we operate may have significantly different laws than those in Malaysia. We must know and comply with the spirit of the laws of the countries where we do business. We must also be sensitive to the cultures and customs of the countries where we operate and respect the communities and environment where we do business.

16.0 Exports, Imports and Trade Controls

- 16.1 It is the Group's policy to comply with all applicable export, customs and trade control laws and regulations, licensing requirements, relevant non-Malaysian laws and Malaysia and international sanctions. Each LCT's company is expected to be aware of any export licensing requirements and to file accurately Electronic Export Information as required by laws and regulations. Each LCT's company is expected to perform due diligence and to know its customers (including the specific end-use and end-user) to ensure that our products will not be shipped to a prohibited party or used for a prohibited purpose.
- 16.2 Each LCT's company is responsible for customs, export and trade control compliance, and shall establish programs to attain this objective, which shall be reviewed by the relevant Head of Department. Any investigation or inquiry by a government organization regarding alleged trade control violations or irregularities should be immediately reported to the relevant Head of Department prior to taking any action. All questions about customs, export licensing and trade controls should be immediately referred to the relevant Head of Department.

17.0 Sexual Harassment

- 17.1 The Group is committed towards preventing and eradicating sexual harassment in order to create a positive and conducive working environment.
- 17.2 All forms of sexual harassment in the work place are strictly prohibited. Equally, any false accusation of sexual harassment will not be tolerated.
- 17.3 All sexual harassment complaints will be investigated in a discreet manner to protect the parties concerned.
- 17.4 For the purpose of this policy, sexual harassment is defined as:
- *"Any unwanted conduct of a sexual nature having the effect of verbal, non-verbal, visual, psychological or physical harassment:*
 - *That might, on reasonable grounds, be perceived by the recipient as placing a condition of a sexual nature on their employment; or*
 - *That might, on reasonable grounds, be perceived by the recipient as an offence or humiliation, or a threat to their well-being, but has no direct link to their employment."*
- 17.5 Before any behavior can be regarded as sexual harassment, the recipient has to inform the harasser that the behavior is unwelcome with the exception of offensive behavior. All employees are encouraged to report any form of sexual harassment to Human Resource Department and will be handled confidentially.
- 17.6 Sexual harassment in the work place will also include any employment related sexual harassment occurring outside the workplace as a result of employment responsibilities or employment relationships.

17.7 Such employment-related sexual harassment may take place in the following manner, but is not limited to:

- At work-related functions;
- In the course of work assignments outside the workplace;
- At work-related conferences or training sessions;
- During work-related travel;
- Over the telephone; and
- Through electronic media.

All employees are required to strictly adhere to this policy. Employees violating this shall be subjected to disciplinary actions, including but not limited to dismissal, being taken by the Management.

18.0 Workplace Violence

18.1 All employees are entitled to have a safe working place. Workplace violence, including threats, threatening behavior, harassment, intimidation, assaults and similar conduct will not be tolerated. Any threat or concern about your safety or the safety of others should be reported immediately to your Manager or the Human Resources Department.

18.2 Firearms, explosives or any other dangerous or hazardous materials are not allowed on the property of the Group or within the premises of the Group without clear and specific authorization by senior management and where legitimate business purpose is being served. Suspected packages or materials must be reported immediately to your Manager and the Safety and Security Manager.

19.0 Medical Reports

19.1 Employees' medical records are confidential. These records are kept separate from all the other Group employee records and will not be released to any person unless required by law, the Management or based upon a written release from the employee concerned.

20.0 Computer and E-mail Usage

20.1 E-mail systems are not entirely secure and may be susceptible to interception. Unlike a spoken conversation, e-mail creates a permanent record. Any e-mail you send may be printed by the recipient and forwarded by the recipient to others and are probably retained on Group computers for a substantial period of time. Therefore, the Group's personnel should exercise the same care, caution and etiquette in sending an e-mail message as they would in normal written business communications. Make sure your e-mail is professional and appropriate to the circumstances. Specifically, the Group will not tolerate abusive, obscene, offensive or profane e-mail. In addition, because the e-mail system is the Group's resource, the Group may, in certain circumstances, have a need to examine and, therefore, reserves the right to read all e-mail communications. Anyone who has been provided with a connection to the internet is provided such connection primarily for business use. Do not download any data that is not in the public domain or that is unprofessional, inflammatory or inappropriate for business use.

20.2 Internet access

Internet access is granted to those needing access for work purposes. Improper usage of the internet may be subjected to disciplinary actions by Management, including, but not limited to, dismissal.

20.3 Internet and Intranet access and e-mail guidelines

Employees must use the Group's Information Technology Resources responsibly and in a manner consistent with the Group guidelines, including those related to specific computer technology, data protection, confidential and proprietary information, and Intellectual Property rights. The Group's Information Technology Resources include all computer equipment that is owned, leased or rented by the Group, regardless of the physical location, including, but not limited to, personal computers, portable computer devices, network servers, access to the internet, the Group's Intranet and e-mail access devices. This also includes voice mail and other voice systems, fax machines, and information obtained or downloaded from and/or disseminated through the internet and the Group's Intranet.

Anyone violating the IT policy or guidelines on the appropriate use of the internet and e-mail will be subject to disciplinary actions by Management, including, but not limited to, dismissal.

20.4 *Specific guidelines:*

- There is plenty of fascinating internet sites to explore but remember that the Group's network is for business use only. Good judgment must be used with any incidental personal use of Group assets. Download only business-related material from authorized sites and senders.
- Observe licensing regulations when downloading or installing software and respect copyrights. Employees will be held responsible for installing unlicensed software in their computers. In addition, they can be subjected to disciplinary action.
- Do not do anything, which would otherwise be considered illegal or inappropriate. Viewing or downloading erotic or sexual material, playing games, running a private business, and transmitting the Group's Confidential Information over the internet are obvious examples of unacceptable use of internet services.
- Do not express personal opinions in external e-mail messages (including harassment of other users).
- Do not upload information owned by the Group to any non-LCT website.
- Do not send or receive software via the internet unless specifically permitted in the software license agreements.
- Do not communicate Confidential Information via e-mail.

- Do not disclose any Confidential Information, Intellectual Property, documents, drawings or confidential financial information via e-mail or internet service without proper approval from the Management.
- Do not send or receive e-mail with file attachments consisting of <filename>.exe, <filename>.vbs, <filename>.com etc. unless approval is given, and it is the responsibility of each employee to ensure that the file is scanned for viruses before proceeding.
- Report any security weaknesses you become aware of, either internally or from external sources.
- FTP (File transfer protocol) should only be used when it is necessary to perform a function of the employee's job.
- For external communication (outside the Group) related to Confidential Information via e-mail, the clause below will be added automatically for all outgoing mail and must not be varied or deleted:

The above message is intended solely for the named addressee and may contain information that is privileged, confidential or otherwise protected under applicable law. Any unauthorized dissemination, distribution, copying or use of the information contained in this communication is strictly prohibited. If you have received this communication in error, please notify the sender by email and erase this communication immediately.

- 20.5 When you detect any irresponsible, unethical or illegal use of the Group's internet, intranet, web or e-mail, you should immediately inform the ITS (Information Technology Services) Department.

21.0 Public Statements

- 21.1 Employees must refrain from giving Public Statements to the news media. If the media contacts you or your employees on matters relating to the Group, the media contact and investor queries should be referred to the Corporate Planning Department.

21.2 Specific Guidelines

- Employees are not authorized to make any statement or to give any information relating to the Group or any of its activities to the news media without prior written clearance from President & CEO.
- All inquiries from the news media must be referred, without comment, directly to the Corporate Planning Department. The news media include newspapers, magazines and other publishers, radio and television stations and/or any other agency that disseminates information to the public.
- Employees wanting to disseminate the Group-related information to the public must first obtain written permission from the President & CEO prior to dissemination.

22.0 Health, Safety and Environment

- 22.1 The Group is committed to maintaining a leadership role in protecting human health, safety and the environment. We will promote and protect the health and safety of our employees, the environment and the communities around the world in which we operate. Therefore, we will strictly adhere to all applicable laws and regulations relating to environmental protection and workplace health and safety.
- 22.1 Many environmental, safety and health laws and regulations are complex. It is your responsibility to familiarize yourself with the requirements of relevant laws and regulations, and record keeping including your individual obligations.
- 22.3 Accidents involving a fatality, environmental contamination, regulatory non-compliance, health or safety hazard must be reported immediately to the Safety and Security Manager and Environment Manager.
- 22.4 In order to protect the safety of all employees, every employee must report to work free from the influence of any substance, including drugs or alcohol that could prevent them from conducting work activities safely and effectively.

23.0 Compliance with all Applicable Laws, Rules and Regulations

- 23.1 Employees of the Group must comply with all applicable laws, rules and regulations in the conduct of the Group's business activities and in the conduct of their day to day activities. The Group's employees are responsible for reporting any non-compliance of such applicable laws, rules and regulations by other employees to the Human Resources Department. Failure of reporting a non-compliance is a violation in itself.
- 23.2 Any non-compliance of such applicable laws, rules and regulations by the employees of the Group can lead to disciplinary actions, including but not limited to dismissal, being taken by the Human Resources Department. However, cases involving corruption, bribery and abuse of power may also be required to be reported to the MACC.
- 23.3 The appropriate channels and procedures for reporting and whistleblowing are outline in the Group's **Whistleblowing Policy**. Such reporting is necessary for Management and the Board to undertake the appropriate measures to prevent future non-compliance and also clarify doubts on what case is regarded as non-compliance and what is accepted.
- 23.4 Should the employee who reports another for non-compliance is found after investigation to have made a mistake, he will not be penalised if such report was made in good faith and without prejudice. Any reprisal made on the employee who reported such non-compliance will be considered as a misconduct and disciplinary action will be taken.

24.0 Equal Employment Opportunity

- 24.1 It is the efforts of our talented and skilled people that make the success of our business possible. Specifically, in matters of employment it is our policy:

- To ensure equal employment and advancement opportunity for all qualified individuals without distinction or discrimination because of age, colour, national origin, race, religion, sex, physical or mental disability, or veteran status.
- To achieve excellence by attracting and retaining people of all backgrounds in our work force. This is part of our Talent Management program.
- To provide training, education and promotional opportunities that permits development and career advancement for the Group's employees.
- To conduct performance appraisals with the goal of giving honest and accurate feedback. To be transparent and to encourage two-way comments and discussion, and to afford review of appraisals by higher levels of management.
- To pay for performance and to recognize and reward contributions made by individuals and teams that exceed their normal job duties.

24.2 This policy applies to all employees and applicants for employment and to all aspects of the employment relationship, including recruitment, hiring, compensation, benefits, training, transfer, and any other terms and conditions of employment. Equal employment opportunity principles must be communicated periodically to all employees and reaffirmed each year.

Should you have any concerns regarding any potential violations of this policy, please contact the Human Resources Department.

25.0 Anti-trust and Competition Law

25.1 Employees of the Group are required to undertake fair and proper business practices at all times. Thus, employees must adhere to the applicable anti-trust and competition laws and regulations such as the **Competition Act 2010** as well as competition laws of every country which the Group operates in. Breaching such a law may result in the Group facing exorbitant fines and a tarnished reputation in the industry. Employees who is found breaching any of applicable laws will face disciplinary action by the Group. Kindly refer to the Competition Guide for guidance.

26.0 Compliance with the Group's Policies and Guidelines

26.1 Employees must comply with the Group's policies and guidelines pertaining to its business issued from time to time. Any non-compliance of such policies and guidelines by the employees can lead to disciplinary actions, including but not limited to dismissal, being taken by the management.

27.0 Misconduct

27.1 In addition to the breaches outlined in this BECOC, the Group may take disciplinary action against an employee if found to be guilty of any form of actions which constitutes as misconduct.

27.2 The following are non-exhaustive examples of acts that would be considered as misconducts:

- Being idle instead of working and deliberately delaying the completion of work;
- Theft of the Group's assets and resources;
- Frequent absenteeism from work and frequently leaving the workplace before the end of the official working hours without obtaining prior permission;
- Failure to adhere to safety rules that may jeopardize the employee safety as well as product safety; and
- Embezzlement of the Group's finances or intentionally causing loss to the Group.

NOTE: Any mode of behaviour or act of an employee which is inconsistent with the fulfilment of expressed or implied conditions of his service shall be a misconduct (major or minor) and is liable to disciplinary action.

28.0 Disciplinary Proceedings

28.1 Where there is a misconduct reported to the Human Resource Department, such misconduct will be investigated, and appropriate disciplinary action shall be taken if such allegations are proven to be true in accordance to the Human Resource Disciplinary Procedure.

28.2 For the purpose of investigation or inquiry, an employee may be suspended in accordance with the contract of service or provision given under the **Employment Act 1955** and **Industrial Relations Act 1967**.

REVIEW OF BUSINESS ETHICS & CODE OF CONDUCT

This Business Ethics & Code of Conduct may be reviewed at any time or from time to time by the Management of the Group. Upon such review, this Business Ethics & Code of Conduct may be amended or varied by the Management and if necessary if such amendments or variations are material, approved by the Board of the Group. All such amendments thereto or variation thereof may be posted on the Website and the Group's Intranet and/or communicated to all via internal office circulars or such other medium of communications (as the Management of the Group may decide from time to time) whereupon such amendments or variations shall be taken, read and construed as an essential and integral part of this Business Ethics & Code of Conduct.

ENGLISH VERSION TO PREVAIL

This Business Ethics & Code of Conduct is available in English and other languages. In the event of any conflict, the provisions of the English version of the Business Ethics & Code of Conduct shall prevail.

ADMINISTRATION OF THE BUSINESS ETHICS & CODE OF CONDUCT

This Business Ethics & Code of Conduct shall be administered and enforced by the Human Resource Department in consultation with the President & CEO and/or where applicable, the Board. The Legal & Compliance team shall be consulted on matters relating to the interpretation of any applicable laws, rules and regulations.

ANNUAL DECLARATION OF COMPLIANCE WITH THE BUSINESS ETHICS & CODE OF CONDUCT

I, the undersigned, declare that I have received, carefully read and fully understand the Business Ethics & Code of Ethics (“BECOC”) of Lotte Chemical Titan Holding Berhad (“LCT”). I faithfully agree to abide by the terms of the BECOC as well as the terms of other such policies and procedures of the Group, and to discharge my duties honestly, in good faith and in the best interest of the Group. I will promptly and fully disclose any fiduciary relationship, activity or personal financial interest that might impair/affect my judgment or influence my decisions.

I hereby certify that I have complied with the BECOC for the year and I undertake to adhere to its requirements in the future.

I understand that any violation or breaches of the BECOC or any corporate ethics or policies and procedures shall render me liable to disciplinary action, up to and including termination from employment.

Signature : _____

Staff no. : _____

Staff name : _____

Designation : _____

Date : _____

INFORMATION SECURITY PLEDGE – EMPLOYEE CERTIFICATION

I, the undersigned, hereby pledge to comply with the information security provisions of the company and the following terms as an employee of the Group.

1. I hereby acknowledge that all rights including ownership, etc. on the information acquired during my period of employment belongs to the company.
2. I will not leak or disclose various information acquired during the period of employment and the business secrets of the company (regardless of the relationship with the job) to a third party without written approval of the company.
3. I will not gain unreasonable benefit or use for purpose of inflicting damage or harm on the company or its officers and Directors using various information acquired while performing duties and the business secrets of the company (regardless of the relationship with the job).
4. I will return all information assets that I'm managing immediately when a reason for cessation of employment has been created and will maintain confidentiality to not use the information even after the change of job or cessation of employment with the company on the confidential information.
5. I will report to the Department Head or an information security supervisor immediately in case of discovering a violation case of information security provisions.
6. I will not damage any business programs, computerized equipment and facilities or carry them out, I will also strictly comply with the access control rules on the areas where I am not authorized to enter.
7. I will use the company's e-mail system only and agree on to performance of e-mail monitoring if necessary, on the records of usage of all e-mail systems for preventing the leakage of confidential information or and to prevent dispute with third parties.
8. I further agree, undertake and covenant with the company as follows:
 - 8.1 I shall not duplicate, copy, photocopy, or in any manner reproduce or cause the reproduction of materials containing any and all information obtained, discovered or to which I have access during my employment including confidential information and trade secrets of the company (hereinafter collectively referred to as "Information), without the prior written authorization of the company. I agree to safe keep such materials/database containing the information, as well as to destroy such documents whenever they are not needed upon and in accordance only with the instructions of the company.
 - 8.2 During my employment, I shall timely inform my immediate superior of all my developments, such as inventions, ideas, discoveries, designs, devices, methods, formulations, programs and improvement techniques and shall assign the rights thereto the company or its assignee, as the case may be required (subject to my personal rights excepted under any applicable law in Malaysia). I shall assist the company or its assignee in obtaining patents and/or other intellectual property rights, deemed necessary to protect said developments.

- 8.3 When my employment terminates or is terminated, or upon the company's earlier request, I shall immediately return all documents, files and database (in whatever form) in my possession containing the Information, including copies and summaries thereof and those I may have prepared during my employment.
- 8.4 I agree that the terms and conditions of this Information Security Pledge forms an integral part of my employment agreement with the company, and I shall indemnify the company or any of its subsidiaries, affiliates or related companies for any and all damages that each or all of them may suffer as a result of my breach of my obligations under this letter agreement.
- 8.5 I agree that my obligations under this Information Security Pledge shall survive and continue notwithstanding the return of the Information or the termination of my employment with the company.

This Information Security Pledge shall be governed in all respects, including validity both during my term of employment from the starting state, construction performance and effect, by the laws of Malaysia.

Signature : _____

Staff no. : _____

Staff name : _____

Designation : _____

Date : _____



ANNUAL DECLARATION OF CONFLICT OF INTEREST

In accordance with the Conflict of Interest Policy of Lotte Chemical Titan Holding Berhad (“LCT”); perceived, potential or actual conflict of interest must be declared in writing. Based on the table below, please mark (X) under the ‘Yes’ or ‘No’ column, where applicable:

No.	Description	Yes	No	If ‘Yes’, please provide further information
1	Do you have any Family members who hold a significant interest (i.e. directorship, shareholdings or key management positions) in the Group?			
2	Do you have any Family members who is a public official in a government department or agency that the Group deals with to obtain approvals or permits (e.g. Royal Malaysian Customs Department) which may give rise to or create a conflict with the Group’s interests?			
3	Do you or your Family members have any commercial dealings, financial or other significant interests (i.e. directorship, shareholdings or key management positions) with any of the Group’s vendors, customers or agents?			
4	Do you have any personal or financial interests eg. secondary employments, directorships or partnership positions in any entities outside the Group which may give rise to or create a conflict with the Group’s interests?			
5	Do you have any other interests which you would like to declare?			

I, the undersigned, hereby declare to have read the conflict of interest stipulations in the Business Ethics & Code of Conduct and the Anti-Bribery & Anti-Corruption Manual. Further, the disclosed information herein is true and complete to the best of my knowledge.

Should there, at any time, be any changes to the above information, I will promptly notify the responsible person of LCT and complete a new declaration of interests which describes the changes.



I hereby agree to notify you of any facts, which may cause a conflict of interest or an appearance of a conflict of interest with LCT's interests, upon which I seek an opinion.

Signature : _____

Staff no. : _____

Staff name : _____

Designation : _____

Date : _____



ANNUAL DECLARATION OF CONFLICT OF INTEREST

I hereby certify the following by signing either section A or B, whichever is applicable to me.

A. To the best of my knowledge and belief, neither I nor any Family members (as defined in the Business Ethics & Code of Conduct (“BECOC”) of Lotte Chemical Titan Holding Berhad (“LCT”)) have any interest that violates the Conflict of Interest Policy. Further, I have not within the past year engaged in any activity which might be in conflict with LCT’s interests or otherwise appear to be in conflict with LCT’s interest as described in the BECOC and the Anti-Bribery & Anti-Corruption Manual (“ABAC Manual”).

Signature : _____

Staff no. : _____

Staff name : _____

Designation : _____

Date : _____

B. In order to comply with the conflict of interest provision as outlined in the BECOC and the ABAC Manual, I hereby notify you of the facts below which may cause a conflict of interest or an appearance of a conflict of interest with LCT’s interests and upon which I seek an opinion:

Signature : _____

Staff no. : _____

Staff name : _____

Designation : _____

Date : _____