

THE STRAITS TIMES SCHOOL POCKET MONEY FUND
Conflict of Interest Policy

1. Introduction

- a. All trustees, officers and staff (collectively, “**Members**”) of the Fund (“**SPMF**”) are obliged to act in the best interests of SPMF, and avoid situations where actual, potential, or perceived conflicts of interest may arise.
- b. When an actual, potential, or perceived conflict of interest arises, the integrity, fairness, accountability, independence, and objectivity of the Member in the performance of his or her duties may be affected. This may harm the best interests of SPMF and damage SPMF’s reputation, which may affect its operational sustainability.

This policy is intended to provide a framework for the disclosure and management of conflicts of interest in SPMF.

2. Relevant Concepts

- a. A conflict of interest refers to any situation in which an individual is in a position to exploit or take advantage of a professional or official capacity in SPMF for their personal benefit, which impedes the best interest of SPMF. A conflict of interest may arise when the personal interests of a Member may potentially interfere with the performance of the Member’s duties for SPMF.
- b. In the context of a conflict of interest, “interest” means any commitment, investment, relationship, obligation, or involvement (financial or otherwise), that may influence a person’s judgement, including:-
 - i. direct interests held in the name of the Member;
 - ii. indirect interests held through another intermediary;
 - iii. deemed interests held by a spouse or domestic partner; and
 - iv. vested interests through a personal relationship, stake or involvement, which may or may not include an expectation of financial gain.
- c. References in this policy to related persons refer to a Member’s family members (i.e., spouse, children, parents, siblings, parents-in-law and sons / daughters-in-law), or partners of the Member (i.e., fiancé or someone with whom the Member has a personal relationship).

3. Declaration of Interests

- a. Compulsory Declarations. All Members are required to declare in the prescribed declaration form at least annually and whenever any changes occur in respect of the following:-
 - i. their interests; and

- ii. if any matter under their purview may result in a conflict of interest.
- b. Conflicted Relationships. Members who have any relationship, friendship or professional or business association with any third party (including potential beneficiary) dealing with SPMF must consider whether those relationships create conflicts of interest with their duties in SPMF, including:-
- i. hiring a relative or friend as an employee or vendor;
 - ii. buying or selling goods or services from / to a family business;
 - iii. having a personal relationship where there is an immediate reporting relationship;
 - iv. volunteering and/or having memberships in any other charities;
 - v. receiving any benefit as a beneficiary of SPMF; or
 - vi. any outside activities, financial interests, or relationships which may pose an actual, potential, or perceived conflict of interest.

In cases of doubt, Members are advised to err on the side of caution and disclose, or seek advice from the General Manager, or such other adviser as may be prescribed by the General Manager.

- c. External Appointments. All Members shall seek the approval of the Board (with the relevant trustee recusing where necessary) before accepting any position as an officer or director of an outside organisation which may pose an actual, potential or perceived conflict of interest.
- d. Records. SPMF shall record and file for a minimum of five (5) years all disclosures of interest made by Members and any decisions made by the Board in relation to any conflict of interest.

4. Operational Conflicts

- a. External Dealings. When dealing with external parties, Members shall maintain an arms-length relationship and refrain from any action or conduct that creates or could create a conflict of interest or could reasonably create the appearance of a conflict of interest.
- b. External Declarations. External counterparties and those acting on their behalf should remain free from conflicts of interest which may adversely influence their relationship with SPMF. SPMF shall, based on a risk assessment approach, require its external partners (including charitable partners involved in the delivery of SPMF's charitable programs) to disclose any actual, potential or perceived conflicts of interest promptly to SPMF.
- c. No Profit. No Member may profit or gain personally (other than through lawful remuneration), either directly or indirectly, by reason of his or her participation in SPMF. Each Member shall disclose to SPMF any personal interest that he or she may have in any matter involving SPMF

(including any relationship to any potential beneficiary) at the earliest opportunity, and shall refrain from participation in any discussion or decision and cessation all involvement in such a matter.

- d. Use of Data. SPMF shall use reasonable precautions to protect, and no Member shall obtain any confidential data of SPMF (including the personal data of any beneficiary or donor of SPMF) for any unauthorised purpose.
- e. Legal Proceedings. Each Member shall immediately inform the General Manager or the Board of any pending or current civil or criminal action, law suit, court proceedings, police investigation or any other regulatory investigation that may be brought against him/her which may affect and/or interrupt his/her involvement with SPMF. The Board shall, wherever necessary, implement any measures to address the effect that such legal proceeding may have on SPMF.
- f. Employment Conflicts. SPMF shall observe the following safeguards to avoid conflicts of interest or perceived biased treatment as a result of relationships between Members:-
 - i. no Member should report to another related Member who has immediate authority over the first-mentioned Member;
 - ii. an employee who marries another employee may continue in his/her appointment provided neither has oversight and/or immediate authority over the other; and
 - iii. where job circumstances change after an appointment, resulting in a conflict of interest, either of the affected employees shall be re-deployed in accordance with his/her skills and interest.

5. Board Oversight

- a. Board Approval. All decisions to proceed with any matter or transaction with an actual, potential or perceived conflict of interest shall be approved by the Board.
- b. Board Conflicts. Where any Board member may have an actual, potential or perceived conflict of interest in relation to any matter / transaction to be approved, the conflicted Board member shall:-
 - i. disclose the conflict of interest of interest to the Board;
 - ii. not participate in the discussion of the matter / transaction; and
 - iii. not be counted in the quorum nor vote on the matter.
- c. Board Approval. In deciding whether to proceed with any matter / transaction with an actual, potential or perceived conflict of interest, the Board shall exercise its judgement independently and free from any obligation or favour towards the conflicted Member. The Board should only

proceed with the matter / transaction on the basis of an arm's length assessment that (as the case may be):-

- i. the terms of the matter / transaction are fair and reasonable and comply with all applicable requirements from the perspective of SPMF;
- ii. there are sufficient safeguards implemented (such as recusals or cessation of involvement) to mitigate the risk of any impropriety resulting from the conflict of interest; and / or
- iii. any beneficiaries are selected on the basis of strict adherence to all prescribed criteria.

The Board shall also record the potential conflict of interest in the minutes of the Board meeting and set out the decision-making process relating to its approval.

Drafted: 5 March 2025