

## **Nobel Design Holdings Ltd Conflicts of Interest Policy**

### **Purpose and Scope**

As part of Nobel Design Holdings Ltd's (the "**Company**") Conflicts of Interest Policy (the "**Policy**"), all directors and employees are required to avoid any conflict between the interests of the Company and their personal interests. This includes the avoidance of actual conflicts of interest as well as the perception of conflicts of interest.

The purpose of the Policy is to protect the integrity of the Company's decision-making process, to enable its stakeholders to have confidence in this integrity, and to protect the reputation of the Company's directors and employees.

This Policy covers the Group's operations in all countries where it operates.

### **Policy**

Upon appointment and whenever necessary, each director and employee shall make full, written disclosures of interests, including details on their relationships with other parties and positions held in other organisations which could potentially result in a conflict of interest. The written disclosures will be kept on file and will be updated as appropriate.

With respect to business transactions or the making of business decisions, directors and employees are required to disclose any interests that they have which may give rise to a situation of a conflict of interest. This conflict of interest can be between the director or employee and the Company, or between the Company and another organisation that the director or employee may serve in.

This Policy is meant to supplement good judgment; directors and employees should respect not just its wording but also its spirit.

### **Governance**

The Board provides oversight for the Policy. The Audit Committee will review the Policy, as appropriate, to ensure the effectiveness of the Policy. The Audit Committee will discuss any revision that may be required, and recommend any such revision to the Board for consideration and approval.

The Chief Operating Officer of the Company has been appointed as the compliance officer for the Group in respect of the Policy.

### **Communication of Policy**

The Policy shall be communicated to the Company's stakeholders, including but not limited to its directors, employees, shareholders, suppliers, business partners and customers. The Policy shall be published on the Company website, which is accessible by the public.

### **Reporting of Conflict of Interests**

Any employee or director who believes that a violation of this Policy has occurred should promptly report such alleged violation to a supervisor or the Chief Operating Officer. Such reports may be made anonymously. Confidentiality will be maintained, subject to applicable laws and regulations.