

Employee Personal Trading

There is nothing wrong with employees undertaking personal investing, but firms have to make sure it doesn't prejudice clients or the firm's own trading.

Our Employee Personal Trading solution is designed to help firms and their employees comply with securities laws/regulations and internal policies:

- **Disclosure** – ensure employees record intended trades before executing
- **Pre-Trade Check** – run and record checks for insider clearing, holding periods, knowledge of client trades/research, etc.
- **Executions** – record employee trades executed and check details

Off the Shelf Solution

The Employee Personal Trading solution meets regulatory requirements “off the shelf”:

- **No software** – browser based so no installation
- **No hardware** – hosted on Microsoft Azure
- **No configuration** – load your users and you are good to go

Great Value

Pre-configured to give you Employee Personal Trading management at a low price.

- **Standardised** – regulatory controls built once and used across regulated firms, achieve compliance with an “off the shelf solution”
- **Multiple Regulators** – simply add “solution” for each relevant regulator on single system
- **Customise** – easy to add/edit controls/checks

Key Features

Powerful inbuilt security and internal controls to efficiently manage and evidence your Employee Personal Trading management:

- **Regulated Firms** – log and manage your Employee Personal Trading at group or country level
- **Incident Management** – identify potential breaches of business and/or regulatory rules
- **Augment** – option to add/edit controls for specific country/business management or regulator requirements
- **Management Information** – extract recorded data and filter for management or regulators

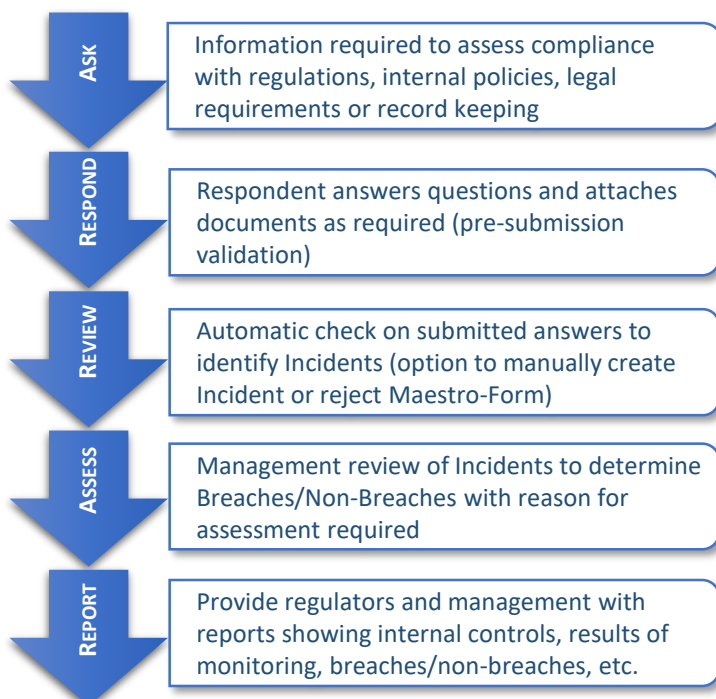
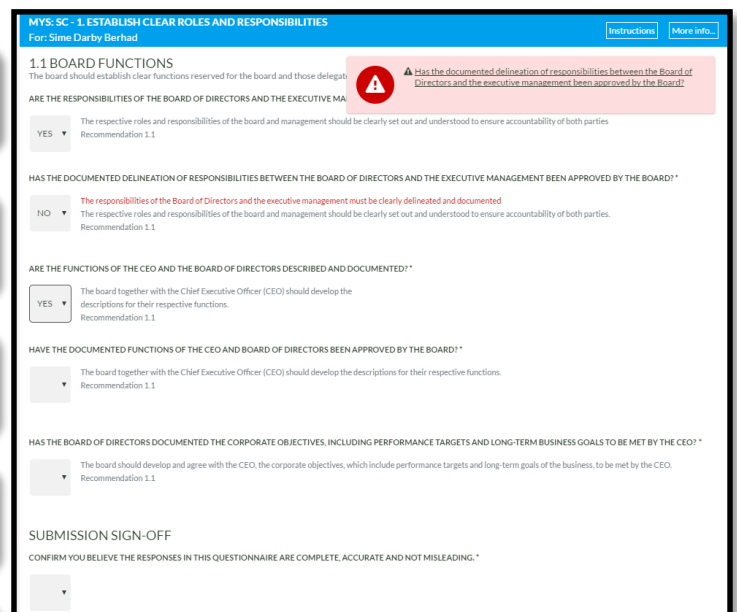
Employee Personal Trading Requirements

GRC-Maestro supports Employee Personal Trading management requirements whether you have a single or multiple regulated firms and whether the firms have a single or multiple regulators.

Regulatory Requirements/Best Practice

- **Procedures:** Management should periodically review the Employee Personal Trading procedures to ensure they meet the local regulatory and business requirements
- **Implementation Review:** The operation of the Employee Personal Trading management procedures should be periodically reviewed to ensure employees are following the procedures
- **Record Keeping:** All Employee Personal Trading must be periodically reviewed to ensure it is reasonable in frequency and size

Ask, Respond, Review, Assess, Report and Record

MYS: SC - 1. ESTABLISH CLEAR ROLES AND RESPONSIBILITIES
For: Sime Darby Berhad

1.1 BOARD FUNCTIONS
The board should establish clear functions reserved for the board and those delegated to management.

ARE THE RESPONSIBILITIES OF THE BOARD OF DIRECTORS AND THE EXECUTIVE MANAGEMENT CLEARLY SET OUT AND UNDERSTOOD TO ENSURE ACCOUNTABILITY OF BOTH PARTIES?
 YES NO
 Recommendation 1.1: The respective roles and responsibilities of the board and management should be clearly set out and understood to ensure accountability of both parties.

HAS THE DOCUMENTED DELINEATION OF RESPONSIBILITIES BETWEEN THE BOARD OF DIRECTORS AND THE EXECUTIVE MANAGEMENT BEEN APPROVED BY THE BOARD?*
 YES NO
 Recommendation 1.1: The responsibilities of the Board of Directors and the executive management must be clearly delineated and documented. The respective roles and responsibilities of the board and management should be clearly set out and understood to ensure accountability of both parties.

ARE THE FUNCTIONS OF THE CEO AND THE BOARD OF DIRECTORS DESCRIBED AND DOCUMENTED?*
 YES NO
 Recommendation 1.1: The board together with the Chief Executive Officer (CEO) should develop the descriptions for their respective functions.

HAVE THE DOCUMENTED FUNCTIONS OF THE CEO AND BOARD OF DIRECTORS BEEN APPROVED BY THE BOARD?*
 YES NO
 Recommendation 1.1: The board together with the Chief Executive Officer (CEO) should develop the descriptions for their respective functions.

HAS THE BOARD OF DIRECTORS DOCUMENTED THE CORPORATE OBJECTIVES, INCLUDING PERFORMANCE TARGETS AND LONG-TERM BUSINESS GOALS TO BE MET BY THE CEO?*
 YES NO
 Recommendation 1.1: The board should develop and agree with the CEO, the corporate objectives, which include performance targets and long-term goals of the business, to be met by the CEO.

SUBMISSION SIGN-OFF
 CONFIRM YOU BELIEVE THE RESPONSES IN THIS QUESTIONNAIRE ARE COMPLETE, ACCURATE AND NOT MISLEADING.*
 YES NO

Contacts

Australia & New Zealand: +61 2 8006 5008

Singapore: +65 9385 7455

UK & Ireland: +44 20 3286 0800

USA: +1 617 401 8009

Web site: www.dynamic-grc.com

Email: info@dynamic-grc.com

LinkedIn:

<https://www.linkedin.com/company/dynamic-grc>