

COMPLIANCE & LEGAL POLICY

ANTI-BRIBERY

I. Forms for Bribery

1. The company strictly prohibits:

a. Offering, giving, receiving, or soliciting any form of bribe from or to business partners or third parties in order to:

- **Gain Prioritization.** To obtain preferential treatment or prioritization in any business or operational processes.
- **Falsify or Improperly Disclose Data.** To falsify records, reports, or any other form of data; To improperly disclose confidential or proprietary information
- **Secure Contracts or Influence Decisions.** To secure contracts or influence business, legal, or governmental decisions.
- **Gain Advantage.** To gain an unfair advantage in any competitive situation, market, or negotiation.
- **Avoid Audits & Penalties.** To avoid audits, inspections, or penalties by regulatory or compliance bodies.
- **Secure Permits & Licenses.** To obtain or expedite permits, licenses, or other official approvals.
- **Induce Improper Performance of Duties.** To induce any individual to perform their duties improperly or unethically.

b. Offering money, *cash or other interests**, or any other benefits to public officials, domestically or internationally.

* **Refer to Marubeni Anti-Corruption Policy for "cash or other interests" definition**

c. Providing gifts or entertainment to Philippine public officials that violate the Anti-Graft and Corrupt Practices Act (RA 3019), and to foreign public officials in violation of equivalent local regulations.

d. Engaging with or enabling business partners to offer *illicit benefits** to governmental organizations or customers for improper purposes.

* **Refer to Marubeni Anti-Corruption Policy for "illicit benefits / gain" definition**

e. Conspiring to pay bribes, including mere discussions in meetings.

II. Facilitation Payments

1. **Facilitation payments** are strictly prohibited, *except* when necessary to protect life or safety; any such exceptions must be immediately reported and documented.

III. Entertainment and Gifts

A. On Receiving Entertainment and Gifts

1. Employees must **never** accept any of the following types of entertainment or gifts **no matter the circumstances**. If offered or received, the employee must immediately report it to their higher officer and return the gifts:

- Gifts in the form of cash or cash equivalents (e.g., gift certificates, precious metals, securities, etc.). However, items socially acceptable in the context of weddings or funerals are exempt.
- Entertainment or gifts that could be interpreted as bribery.
- Entertainment or gifts from unethical or illegal sources.
- Entertainment or gifts that go against public policy or could harm the Company's reputation.

2. Receiving entertainment from business partner is allowed as long as it does not exceed P4,000.00, which is defined as the socially reasonable standard and does not fall in any of the types mentioned above.

3. Receiving of gifts is prohibited. However, if a business partner unexpectedly prepares a gift, it may be accepted provided its value does not exceed P4,000.00 and does not fall in any of the types mentioned above. It must also be reported and turned over to Admin. Dept.. Additionally, the total accumulated value of all gifts and entertainment received within a month should not exceed Php4,000.00.

4. No report is needed for the receipt of entertainment and gifts for the following:

- Meals or drinks at a meeting or conference.
- Attending an official memorial or party.
- Receiving a small gift, souvenirs, refreshments or commemorative items, or transportation that is reasonable and linked to business activities
- If the cost of entertainment or gifts is shared between the employee and the Business Partner.

B. On Giving Entertainment and Gifts

1. Providing gifts or entertainment to Philippine public officials is not allowed.

2. Engaging with or enabling business partners to offer illicit benefits* to governmental organizations or customers for improper purposes is strictly prohibited.

*** Refer to Marubeni Anti-Corruption Policy for "illicit benefits" definition**

3. It is generally unacceptable to give gifts. However, giving a gift is permissible if:

- it is as a return gesture for a gift that has already been received and the value of the gift or the total accumulated value of all gifts and entertainment given within a month does not exceed P4,000.00.
- the item is socially acceptable in the context of weddings or funerals

4. Providing cash or anything equivalent to business partners is strictly prohibited.

IV. Donation

1. All donations and sponsorships shall be allowed provided they are transparent, properly documented, and approved by proper authorities to ensure they serve legitimate business or charitable purposes, not as disguised bribes.

2. Donations and sponsorships shall not be offered or given to influence business decisions or gain improper advantages, and must comply with all applicable laws and regulations.

V. Moonlighting

1. The company strictly prohibits employees from engaging in unauthorized secondary employment or **moonlighting**, as such activities may compromise work performance, create conflicts of interest, or increase the risk of bribery and corruption through undisclosed external influences or financial incentives.