



MJC Drive, Sta. Cruz, Manila
 Tel No. 632-7373/Fax No. 631-2846

CODE OF BUSINESS CONDUCT AND ETHICS

Business Conduct & Ethics	Directors	Senior Management	Employees
(a) Conflict of Interest	<p>The Directors, officers and employees should act in the best interest of the Company and avoid any activity, interest, or association outside the Company that could impair their ability to perform their work objectively and effectively or that could give the appearance of interfering with their responsibilities on behalf of the Company or its clients. A conflict of interest occurs when the private interest of a director, officer or employee interferes or appears to interfere in any way with the interests of the Company as whole or when a director, officer or employee takes actions or has interests that make or appear to make it difficult to perform his or her Company work objectively and effectively.</p>		
(b) Conduct of Business and Fair Dealings	<p>The Company seeks to outperform its competitors fairly and honestly through superior performance. We do not take unfair advantage of anyone through manipulation, concealment, abuse or privileged information, misrepresentation of facts or any other unfair dealing practice.</p> <p>We treat our employees and applicants for employment fairly and will not discriminate on account of gender, religion, age, nationality, family status or any other reasons prohibited by law.</p> <p>We treat everyone with respect and shall be guided by professionalism, integrity and good faith in transactions with and obligations to our Company's customers, suppliers, business partners, government regulators, creditors, creditors and employees.</p>		
(c) Receipt of gifts from third parties	<p>We restrict the solicitation or acceptance of gifts in any form from a third person or entity, directly or indirectly in consideration of any act, omission or transaction of our Company favorable to such third person or entity with existing or intended business dealings with our Company.</p> <p>A "gift" may be a right or thing of value, like cash or cash equivalent, loan, fee,</p>		



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	<p>reward, commission, allowance, employment, travel and benefits.</p> <p>The restriction shall not apply to: a) a gift of nominal value voluntarily given by a third person or entity to a director, officer or employee of our Company as souvenir or out of courtesy; or b) a gift given for charitable projects for the benefit of the poor or the general public.</p>
(d) Compliance with Laws & Regulations	<p>We shall comply with all laws and the rules and regulations of the regulatory agencies governing the business operations of our Company.</p> <p>In the performance of our duties, we shall at all times, be aware and adhere to the requirements, restrictions and limitations imposed by laws, rules and regulations and our Company's policies , rules and regulations.</p>
(e) Respect for Trade Secrets/Use of Non-public Information	<p>We maintain and safeguard the confidentiality of information entrusted to the directors, officers, and employees by our Company, except when disclosure is authorized or legally mandated. Confidential information includes any non-public information that might be of use to competitors, or harmful to our Company if disclosed.</p> <p>This confidentiality obligation shall survive our separation from our Company due to retirement, resignation, termination, expiration of term of office, or expiration or termination of contract, or any other cause.</p> <p>We shall not take undue advantage of material non-public information by dealing in the securities of our Company while in possession of such information. Material non-public information refers to any information that is likely to affect the market price of our Company's securities and is not yet publicly disclosed.</p> <p>We respect and uphold the confidential and proprietary information of other companies. We shall not knowingly appropriate, infringe or make an unauthorized use of a valid trademark, patent, trade secret or proprietary technology belonging to our Company or to another person or entity.</p>
(f) Use of Company Funds, Assets and	<p></p>



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Information			
(g) Employment & Labor Laws & Policies	We shall comply with all laws and the rules and regulations of the regulatory agencies governing the business operations of our Company.		
(h) Disciplinary action	<p>The Company affords procedural and substantive due process to any employee found to have committed an offense against the corporation's established authority, policies and procedures, rules and regulations during office hours and within company premises.</p> <p>Thus, a Disciplinary Action Memorandum (DAM) should be initiated by any of the following persons: the section head or the department head of the subject employee or by any officer of the corporation. The DAM (notice) should state, among others, the offense charged and the duration which the employee is required to submit a reply.</p> <p>After the receipt of the reply, an investigations and/or hearings may be conducted.</p>		