



# **SBS PHILIPPINES CORPORATION**

## **CODE OF BUSINESS CONDUCT AND ETHICS**

The trust of the Company's stakeholders, especially its customers and business partners, is very important to the Company. In preserving this trust, the Company is committed to conduct its business in a responsible and ethical manner.

Anchored on long-held values of integrity, honesty, fairness and respect for others, this Code sets out the guiding principles by which the Company, its shareholders, directors, officers and employees will conduct their dealings with each other as well as with the Company's suppliers and customers, bankers and other business partners, the government and general public.

All directors, officers and employees of the Company are expected to observe and comply with the standards of conduct set out in this Code.

All directors, officers and employees of the Company shall conduct business in accordance with Philippine laws and regulations, and abide with the policies of the Company and observe its rules and regulations, including this Code.

### **A. Fairness**

All directors, officers and employees of the Company shall treat everyone with honesty, courtesy, consideration, friendly spirit of cooperation and mutual respect. No director, officer or employee shall engage in any unfair dealing practices nor take undue advantage of customers, suppliers, business partners, competitors and the government through manipulation, concealment or misrepresentation of material facts.

### **B. Information Protection**

Unless with the prior approval of the Board of Directors or Management, no director, officer or employee shall divulge to any other person, other than the relevant employee, officer, director or shareholder of the Corporation, on a need to know basis, trade secrets and confidential information concerning the Corporation, to include but shall not be limited to its financial information, supply and procurement information, marketing and customer information, stockholder, management and personnel information, its manner of operation, corporate plans and projects, business processes and corporate schemes, or data of any kind or character which is acquired, learned or received during one's employment with the Corporation.

All directors, officers and employees shall see to it that the integrity of the Company's documents and records are preserved and the necessary safety measures are undertaken to prevent its unauthorized or improper alteration, forgery, concealment and destruction.

**C. Care of Company Property**

All directors, officers and employees shall properly, responsibly and efficiently use Company assets and resources and shall take the necessary due care to safeguard such properties and prevent any unauthorized use thereof. Such assets and resources of the Company shall be used for legitimate business purposes only and will not be used or disposed for private or personal gain of the director, officer or employee.

The Company reserves the right to inspect its facilities and property, including computers, telephone records, email, lockers, internet usage, business documents, offices and other workspaces, subject to applicable laws and regulations.

**D. Work Culture**

All directors, officers and employees of the Company shall work under a culture of integrity and excellence and with a sense of accountability, transparency and urgency.

**E. Anti-Corruption**

The Company does not tolerate any form of corruption by its employees and suppliers. Any solicitation or offering of gifts, payments, fees, rewards or contributions, or any advantage, financial or otherwise, by Company employees and their relatives, or by suppliers and their representatives, in exchange for business or for personal gain is strictly prohibited. Under no circumstances shall Company employees make or authorize, directly or indirectly any illegal or improper payment to employees of customers. All employees are expected to report any such violations or suspected violations.