

FILINVEST

Code of Business Conduct

2024

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Code of Business Conduct

Filinvest Group of Companies

The Filinvest Code of Business Conduct (the “Code” or “CoBC”) is a guide that affirms our commitment to integrity, transparency, and responsible business practices. The CoBC defines how Filinvest employees, as guardians of the Filinvest brand, are expected to conduct themselves while performing their duties and responsibilities.

Integrity

Integrity is the cornerstone of this CoBC.

At Filinvest, we value being honest and truthful and strive to nurture strong moral principles. It is our intention to always do the right thing in the right way, and by doing so, earn the trust and respect of the stakeholders that we serve.

By adhering to this Code, we foster a culture of excellence, trust, and respect within the organization, reflected in the way we relate with each other, our customers, partners, and other stakeholders.

General Principals

We protect our employees' welfare.

We protect our employees' welfare, fostering an inclusive workplace where equal opportunities thrive, and colleagues treat each other with respect and fairness working as a team. We ensure our employees know their responsibilities, based on the company's goals and values, and proactively support their well-being and professional growth.



We value our customers and other stakeholders.

We believe that our customers' trust must be continually earned, deserved, and preserved. We are dedicated to delivering high-quality products and services to our customers in all our operations, in compliance with laws and adhering to high ethical standards.

We respect our regulators and comply with the law.

We endeavor to comply with all laws relevant and applicable to all our businesses. It is our intention to be a good corporate citizen by acting responsibly and upholding ethical standards. Aside from complying with all laws relevant to a listed company and its subsidiaries, we respect the rights of others. We work with our government and ensure compliance with relevant laws.

We give back to the community.

Filinvest strives to become a good corporate citizen and recognize that helping society benefits us all. It strengthens our company and helps fulfill our business purpose—to enable people to achieve their dreams. We seek to improve the well-being of people through our responsible business actions and through sustainable social investments designed to improve the communities where we live and operate.

Application of Our Principles and Values

As Filinvest employees, we are responsible for understanding the important legal and ethical issues that affect our organization and our various businesses.

We are aware of the company's policies and regulations. We are familiar with the laws and policies that affect the company, especially those that are related to our individual roles and responsibilities.

If we need more information about what we need to do, or if we believe a law or policy is being violated, we are at liberty to raise our concerns to the Human Resources Department or Legal Department, who are expected to act on our concerns.

Equal Opportunity

Filinvest upholds the policy of equal employment opportunities. It treats employment applicants and its employees equally without bias for or against race, color, ethnicity, creed, ancestry, religion, sex, sexual orientation, age, gender identity or gender expression, national origin, marital status, pregnancy, childbirth or related medical condition, genetic information, military service, medical condition (as defined by state or local law), the presence of a mental or physical disability or other characteristics protected by applicable laws. Employees are expected to respect the same principles within the workplace.

Safe Space

We cultivate a safe space for employees. Filinvest promotes and values a work environment free of verbal or physical harassment. This includes any offensive comments that tends to inhibit diversity in the workplace. We are strongly against any form of substance abuse and committed to achieving an environment free of substance abuse for the health and well-being of employees and for the benefit of the Company. The use of illegal drugs and the misuse of alcohol and other substances, including over-the-counter or prescription drugs, is prohibited in the workplace. The workplace includes anywhere that an employee is conducting Filinvest business, regardless of time or location.

Strictly in accordance with applicable laws, Filinvest may conduct pre-employment drug testing and colleagues may be tested if they display unusual or erratic behavior such that there is a reasonable suspicion of substance abuse. In addition, where permitted by law, colleagues may be subject to additional testing, including unannounced testing on a random basis.



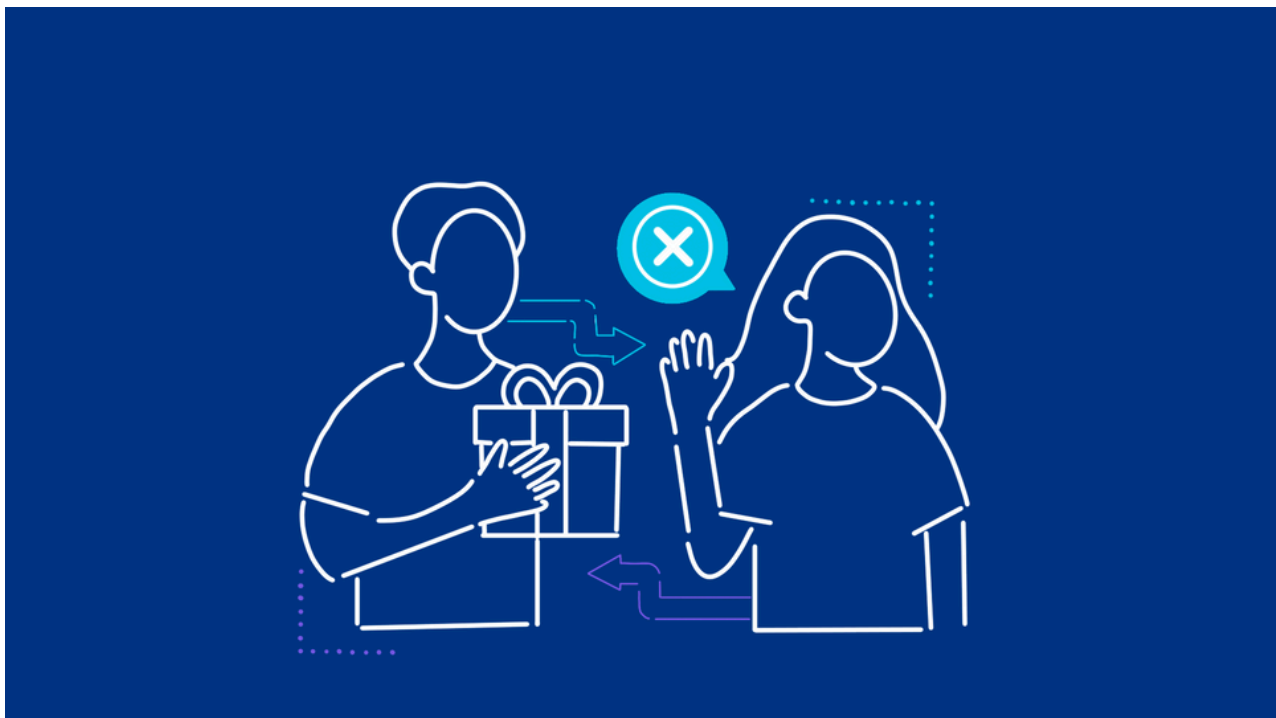
Conflict of Interest

Our employees do not make decisions in situations where there is conflict of interest.

A conflict of interest arises when one places his/her personal, social, financial or political interests before the interests of the Company. Even the appearance of a conflict can damage one's reputation or that of the Company. Any potential conflict of interest must be disclosed to and approved by an employee's supervisor.

The following are examples of potential conflicts of interest.

- Personal investments with entities having relationship with Filinvest companies; or receiving compensation from a Filinvest supplier, competitor or customer.
- Outside Business and other Interests that can affect such employee's objectivity, motivation or performance as a Filinvest employee such as having a second job or a personal affiliation with a Filinvest competitor, customer, supplier.





Proprietary Information

Our employees protect the Company's confidential and proprietary information.

The products, services, ideas, concepts, plans and other information we create and collect daily in the course of our work are proprietary assets of Filinvest. These include marketing plans, sales data, records on customers and fellow employees, construction and service techniques, pricing data and information about business development opportunities.

We uphold this principle by following these guidelines:

- We do not share confidential information to third parties, including our partners and vendors, without management's approval. If needed for the business, we require Non-Disclosure Agreements (NDAs) for collaborative projects involving third parties.
- We disclose business or organization information to our fellow employees on a need-to-know basis and through official internal channels. Publicly disclosed information is made available through the company website.
- We do not discuss confidential information in places where our discussion can be overheard.
- We keep confidential information safe, whether in the office or elsewhere. Extra care is taken when carrying it outside our work premises. We also secure our laptops to prevent theft when taken outside work premises.
- We dispose of confidential or proprietary information, particularly those in hard copies in a secure manner.
- We implement measures to safeguard information stored or processed in our systems, protecting against external hackers and unauthorized internal access. We remain vigilant against unauthorized access, including 'phishing' disguising techniques.
- We exercise vigilance when outsiders request business and organizational information, whether through face-to-face conversations, phone calls, emails, or social media channels.

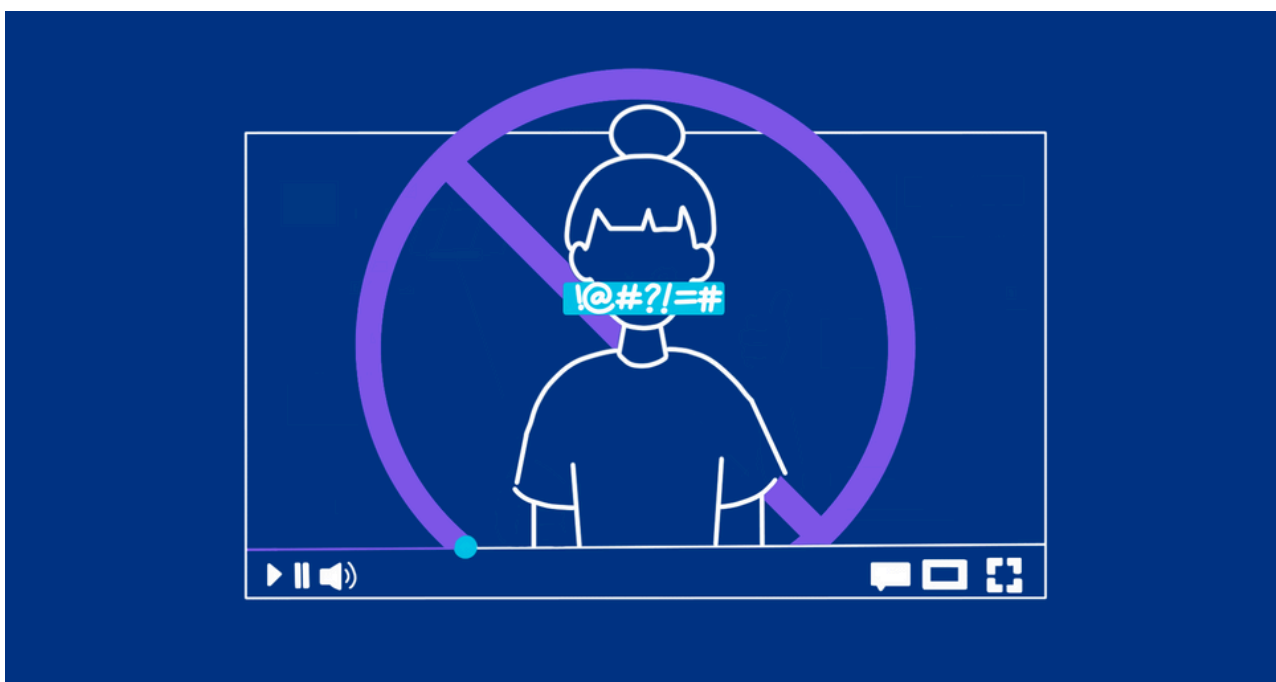
Use of Social Media

We use social media responsibly.

“Social media” are digital technologies and platforms that enable people to create and broadly share to other people content, opinions, insights, experiences and perspectives. The hallmarks of social media are uncensored content and mass and rapid interaction.

When engaging in social media activities as part of doing business including both internal-facing and external-facing platforms, we adhere to the following general principles:

- We make only appropriate and authorized disclosures and never post messages that cast a negative light on the Filinvest brand.
- We are truthful, accurate and respectful.
- We refer media inquiries from the mass media or reporters to our Corporate Communications Teams.
- We limit the posting in official Filinvest social media websites or pages to only a few authorized employees such as from Corporate Communications and Marketing.





Data Privacy


We protect personal data and information by following these guidelines:

- We comply with applicable laws and regulations in the Philippines and of other jurisdictions where personal information is collected and used.
- We collect and use the minimum amount of personal information necessary to achieve legitimate business purposes and we keep it only as long as necessary to achieve those purposes.
- We share personal information only with individuals who have a legitimate need for it and will protect it properly.
- We follow Company guidelines for handling and destroying personal information.
- We report Data Privacy Incidents. Whenever we learn of an inappropriate disclosure of personal information, we immediately notify our manager or our organization's Data Privacy Officer of such incidents.

G. Records and Information Management

We ensure good records and information management, accurate books and record keeping.

- We keep and maintain accounting, legal and other important documents and information which are accurate, complete and in accordance with the accounting standards and requirements of the laws and regulations. These include financial statements, vouchers, bills, invoices, expense reports, payroll and benefits records, contracts and formal agreements, minutes and resolutions from meetings of the board of directors, performance evaluations and other essential company data. We preserve and properly safekeep these records, documents and information and make them available for presentation to government regulators and private institutions such as financial institutions and external audit firms when required to do so.

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- Filinvest develops, acquires and maintains information systems and networks to support the growth and operations of the business and to help employees perform their tasks efficiently. To ensure the security and integrity of Filinvest's technology and information systems:
 - We use only authorized software, devices and procedures.
 - We do not share our password except for a valid business reason (such as Filinvest's technical support)
 - We do not use unauthorized devices, such as home computers, to transmit, store or work on Filinvest confidential or proprietary information.

Intellectual Property Rights

We protect our intellectual property and respect those of others.

Filinvest's intellectual property includes its patents, trademarks, trade secrets and copyrights, as well as scientific and technical knowledge, know-how and experience developed in the course of its activities. We support the establishment, protection, maintenance and defense of Filinvest's intellectual property rights. We use these rights in a responsible way in the pursuit of our business. We also respect the intellectual property of others. We recognize that unauthorized use, theft or misappropriation of third-party confidential information or intellectual property may result in significant fines, lawsuits, injunctions or criminal penalties for the Company and ourselves.

We use our Information Systems legitimately and professionally.

Insider Trading

We do not engage in insider trading activities.

“Insider trading” occurs when a person buys or sells securities (for example, stocks, bonds or options) of a company while they are in possession of “inside information”— material, nonpublic information—relating to the company. Securities laws and Filinvest policy prohibit employees, members of the board of directors and owners from using or disclosing any inside information that may benefit them in trading securities.

We do not use information gained through employment or affiliation with Filinvest before this information is known publicly through disclosure to the Securities and Exchange Commission and the Philippine Stock Exchange to buy or sell the securities of Filinvest or any other company with which Filinvest has or may be considering a relationship, such as a customer, supplier, alliance partner or potential acquisition or collaboration candidate. In addition, we do not give inside information to anyone else so that they can trade. These restrictions apply to us, our respective spouses and minor children and anyone who lives in our household or is financially dependent on us.





Fair Competition

We comply with laws that promote competition in the market aimed at protecting consumers. We comply with Antitrust and Competition Laws as we believe in protecting consumers and ensuring free enterprise. These laws prohibit agreements between or among competitors that manipulate prices and/or terms or conditions of sale, or restrain trade, open market practices and fair competition. Filinvest prohibits:

- Discussions or contacts with competitors about pricing, costs, or terms or conditions of sale.
- Discussions or contacts with suppliers and customers that unfairly restrict trade or exclude competitors from the marketplace.
- Agreements with competitors regarding allocating markets or customers.
- Agreements with third parties to boycott customers or suppliers.
- We obtain competitive intelligence in an ethical manner. We collect and use business information about other companies, including competitors, ethically and in compliance with laws and confidentiality obligations.



Bribery & Corruption

Filinvest prohibits “commercial bribery” or other forms of unfair marketing practices.

Generally, commercial bribery involves giving, offering, requesting, accepting, or receiving something of value to or from an individual or company to secure an improper advantage in commercial activities. We are committed to integrity in our marketing practices, promoting our products truthfully and refraining from false or misleading advertising to our consumer audience. Additionally, we avoid making unfair or untruthful comments about our competitors and their products and services, particularly those made through social or mass media.

Filinvest prohibits its employees, and anyone acting on their behalf, from offering, giving, requesting, accepting or receiving a bribe. We comply with laws that forbid making, offering or promising any payment or anything of value (directly or indirectly) to a government official when the payment is intended to improperly influence an official act or decision to award or retain business or gain a business advantage.

Sustainability

Filinvest aims to become a corporate sustainability champion. It aims to deliver in an authentic and transparent manner its commitments on corporate social investments; economic, environment, social and governance best practices, and; creating shared value.

We create value for both shareholders and stakeholders, we champion equality and diversity in all aspects of operations and we are ready for disruptions, challenges and opportunities that come our way

Upholding Our Principles

Open Door Policy

We report violations to uphold the value of integrity and trustworthiness in the Filinvest organization, providing safe channels for hearing concerns. All our managers must keep an “open door” for fellow employees who may reach out to them.

If we reasonably believe that a fellow employee may have violated the law or any company policy, we have the responsibility to report that information immediately to our supervisor or any member of the Human Resources or Legal Departments. By raising concerns before a violation occurs, our management will have the opportunity to prevent such acts, safeguarding the integrity of the company, its employees, and the public interest.

We are encouraged to present ideas, ask questions and raise concerns especially those of a legal or ethical nature, and those relating to quality of work and the working environment.

We are free to reach out to management representatives aside from our immediate supervisor.

Anti-Retaliation and Confidentiality

We do not retaliate against those who report actual or potential violations.

Retaliation against any employee who in good faith seeks advice, raises a concern, reports misconduct or provides information in an investigation is prohibited and a cause for disciplinary action.

Any individual who retaliates against an employee who has truthfully and in good faith reported a potential or actual violation, will be penalized with disciplinary actions and/or warnings for making such acts of retaliation. However, if upon investigation, an individual is found to have intentionally fabricated false information or report about an employee, the company shall also have the duty to take the necessary action.



We maintain confidentiality to encourage employees' openness.

We ensure employees feel secure in carrying out their responsibilities, maintaining the confidentiality of both information and employee identities. In cases where revealing employee identities is unavoidable due to the nature of an investigation, management will implement measures to ensure the safety and protection of those providing sensitive information.

Employees involved in an investigation of a reported violation are expected to keep the details of the investigation confidential. Confidentiality helps preserve the integrity of the process and protects the individuals participating in the investigation. Any exception to the principle of confidentiality must first be discussed with the Legal Department.



Disciplinary Actions

Filinvest employees are never permitted to violate the law or any of the policies of the company. Violations will result in warnings if minor or disciplinary action, including termination of employment, if major. Disciplinary actions are imposed for:

- Knowingly and intentionally violating the law or company policy.
- Directing or causing others to violate the law or policy.
- Failing to cooperate in a company investigation of possible violations.
- Retaliating against colleagues for reporting an actual violation.
- Failing to effectively monitor the actions of subordinates when there are indications of violation of laws and policies.

Contact Us

Legal Department

Email: governance@filinvestgroup.com

Human Resources

Please contact your respective HR Operations Head.

www.filinvestgroup.com



One Tree. One Heart.
ONE FILINVEST

Core Values



Customer Centricity

We keep our customers top of mind.



Change for the Better

We keep an eye on innovation and agility to rule our quest for operational excellence.



Filinvest Family

We invest in bringing out the best in ourselves and our team.



Entrepreneurial Mindset

We pursue new opportunities and take ownership of our decisions.



Shared Benefit

We grow hand and hand with our stakeholders.



Trustworthiness

We deserve and preserve trust.