

Anti-Corruption Activities and Programs

The Company's Anti-Corruption Policy is supported by activities that strengthen corporate governance standards and ensure proper use of Company's properties and funds. This Policy is interconnected with the Company's overall ethics and compliance programs.

1. The Company strictly observes the giving and receiving of gifts from suppliers, government officials above the nominal and not in appropriate occasion.
2. Participation in training and seminars by Directors, Officers and Employees with topics on anti-corruption and anti-bribery
 - a. Introduction to Fraud Awareness Topic – Contemporary Topics on Corporate Governance, April 11, 2016
 - b. Orientation and Training on the US Foreign Corrupt Practices Act and related topics – Business Integrity Workshop, April 22, 2016
3. The Company sets guidelines on mitigating the risk of anti-corruption activities:
 - a. Prohibition of facilitation of payments
 - b. Misuse of legitimate business activities to disguise a bribe or as trading influence
 - c. Setting thresholds to charitable contributions, sponsorships and the likes and establishes approval procedures
 - d. Monitoring of compliance and reporting any act of anti-corruption through the Whistleblowing channel.