

POLICY NO.	- Gen-001
EFFECTIVITY DATE	- Feb 2019
ORIGINAL POLICY NO.	- NEW
ORIGINAL ISSUE DATE	- NEW
LAST AMENDMENT DATE	- NEW
PROCEDURE FLOW NO.	- NONE

POLICY TITLE: ANTI-BRIBERY AND CORRUPTION POLICY

POLICY STATEMENT:

The company believes that the conduct of good business includes high standards of ethics. It is the company's policy to conduct its business in an honest and ethical manner and avoid acts which might reflect adversely upon the integrity and reputation of the company, including its Board of Directors (BOD), officers and stockholders. The company does not tolerate any form of corruption and shall at all times comply with applicable laws, rules and regulations concerning bribery and corruption.

OBJECTIVES:

1. To set out the responsibilities of the company, the BOD, and all its members in observing and upholding the company's stand on bribery and corruption.
2. To formulate guidelines for and assign responsibility over the proper implementation of this Policy.
3. To provide a basis for penalizing any violation of or non-compliance with this Policy.

POLICY GUIDELINES:

1. Definition of Terms:
 - 1.1. **Bribery** – shall be that as defined under the Revised Penal Code (RPC) and special laws. In general, it refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.
 - 1.2. **Corruption** – shall be that as defined under the Revised Penal Code (RPC) and special laws. Corruption is generally defined as dishonest behavior by those in positions of power, such as managers or government officials, with the participation of private individuals.
 - 1.3. **Kickback** – is generally defined as an illegal payment intended as compensation for preferential treatment or any other type of improper services received.
2. General Guidelines:
 - 2.1. The company is committed to upholding all laws relevant to countering bribery and corruption in the conduct of its business.
 - 2.2. Towards this end, the company, its BOD, officers and all members shall not:
 - 2.2.1. engage in or tolerate any form of corruption, bribery, theft, embezzlement, or extortion or the use of illegal payments, including without limitation, any payment or other benefit conferred on any individual, company or government official, for the purpose of securing a concession or favorable approval/judgment/resolution/decision or influencing the decision-making process in violation of applicable laws;

- 2.2.2. offer illegal benefits or illegal favors such as bribe payments, kick-backs, or other illegal benefits including inappropriate gifts and undue hospitality towards any individual in exchange for business opportunities; and
 - 2.2.3. do any act or participate in any transaction, directly or indirectly, which is similar or related to the foregoing prohibited acts/transactions.
 - 2.3. This Policy applies to all members of the BOD, management, all members of the company, the company's partners, such as hospitals and clinics, consultants and contractors.
 - 2.4. This Policy shall be communicated to members of the company and to business/service partners at the outset of the business relationship. Compliance with this Policy shall be incorporated in all appointment, employment and service agreements with the company's BOD, members and third parties, as may be applicable.
 - 2.5. Awareness and compliance with this Policy shall be included in the induction process for all new directors and members of the company. All existing directors and members will be provided relevant training on how to implement and adhere to this Policy.
3. Any violation or non-compliance with this Policy shall constitute as grounds for termination of the erring member. The company's Code of Discipline is hereby amended or supplemented accordingly.

IMPLEMENTATION:

1. The BOD and the President shall have the overall responsibility for ensuring the strict and proper implementation of this Policy.

MONITORING:

1. The FIAd Head is responsible for monitoring the strict and proper implementation of this Policy.

AMENDMENT:

1. This Policy may be amended/canceled at any time. Any amendment to/cancellation of this Policy must be in writing and duly approved by the President

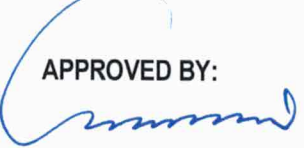
EFFECTIVITY:

1. This Policy takes effect ten (10) days after approval by the President.

POLICY WRITTEN BY:


ATTY. CARLO ROBERTO C. SOLIS

APPROVED BY:


ELMER Z. ACANCE
President