

CODE OF BUSINESS CONDUCT AND ETHICS

The Company's policies on the following business conduct and ethics affecting the directors, senior management, and employees are discussed below:

- i. **Conflict of Interest:** All employees, irrespective of rank should always act for the best interest of the company. All conflict of interest shall be avoided and prohibited. In the event such will occur, disclosure must be done to the immediate supervisor and/or Human Resources Head.
- ii. **Conduct of Business and Fair Dealings:** Business is dictated by free competition - no monopoly, no price manipulation. Price is dictated by supply and demand. Employees are required to comply with fair trade practices.
- iii. **Receipt of gifts from third parties:** All employees are prohibited from accepting gifts based on the no gift policy of the Company.
- iv. **Compliance with Laws & Regulations:** All employees, in the conduct of business, are obliged to comply with all relevant laws and regulations.
- v. **Respect for Trade Secrets/Use of Non-public Information:** All employees are required to sign and adhere to a confidentiality agreement. All employees are prohibited from disclosing or using to their own advantage any nonpublic information.
- vi. **Use of Company Funds, Assets and Information:** All employees are required to act as responsible custodians of all Company funds, assets, and information. As such all are required to protect and preserve Company assets.
- vii. **Employment & Labor Laws & Policies:** The Company complies with all existing employment and labor laws and policies.
- viii. **Disciplinary action:** Disciplinary actions are meted only after due process. The Company has a Code of Conduct that serves as a guide for the employees' behavior.
- ix. **Whistle Blower:** The Company has a whistle blower policy that provides an avenue for employees to report misconduct of fellow employees, including their superiors, while protecting the employee's identity and welfare.
- x. **Conflict Resolution:** The Company provides a work environment that is conducive to friendly resolution of disagreement. Superiors should promote amicable settlement of conflicts