



Cirtek Holdings Philippines Corporation

Code of Business Conduct and Ethics



CODE OF BUSINESS CONDUCT AND ETHICS

CIRTEK HOLDINGS PHILIPPINES CORPORATION (the “Company” or “Cirtek Group”) strictly upholds its Code of Business Conduct and Ethics in line with its corporate governance principles and sustainability goals and objectives.

- 1. OBSERVANCE WITH LAWS AND REGULATIONS** – The Company will abide with all applicable laws and regulations of the Philippines and other countries and organizations that the Company is doing business with.
- 2. BEHAVIOR TO CUSTOMERS** - The Company shall respect its customers and its representatives and conduct business with integrity.
- 3. MANNER TO SUPPLIERS** - The Company shall respect its suppliers and conduct business with integrity. The Company’s employees shall not accept nor ask any favor from suppliers for personal gain, nor conduct any anomalous transaction in violation of the policies of the Company.
- 4. INDIVIDUAL CONDUCT** - All employees, personnel, customers, contractors and visitors shall observe all applicable Company rules, policies and regulations. Business transactions and work performance must be conducted with respect and integrity.

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5. **DISCLOSURE OF INFORMATION** – The Company shall store and, when required, disclose information regarding its business activities, structure, financial condition and performance in accordance with applicable laws, regulations, prevailing industry practices and Company policies. Confidential Information, as defined in Company policies, shall be stored accordingly and shall not be disclosed to any unauthorized party. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.
6. **BUSINESS INTEGRITY** - The highest standards of integrity must be upheld in all business interactions. There shall be a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement. All business dealings shall be performed with transparency and fairness. Internal controls for monitoring and enforcement shall be set in place.
7. **NO IMPROPER ADVANTAGE** - The Company shall not tolerate any form of bribery nor any means of obtaining undue or improper advantage.
8. **INTELLECTUAL PROPERTY** - The Company shall ensure that intellectual property rights are respected; and the transfer of technology and know-how shall be done in a manner that protects intellectual property rights.

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9. **FAIR BUSINESS, ADVERTISING AND COMPETITION** – The Company shall uphold standards of fair business, advertising and competition.
10. **PROTECTION OF IDENTITY** – The Company shall implement its programs that ensure the confidentiality and protection of supplier and employee whistle blower. Any information or the person reporting any misconduct or irregularities shall be treated with strict confidentiality.
11. **RESPONSIBLE SOURCING OF MINERALS** – The Company shall uphold its policy to reasonably assure that the minerals in products manufactured by suppliers do not directly or indirectly violate human rights laws and regulations of the countries of origin and/or non-government agencies or organizations with jurisdiction. Suppliers shall exercise due diligence on the source and chain of custody of the minerals and make their due diligence measures available to customers upon customer request.
12. **PRIVACY** – The Company is committed to protect the -personal information of everyone that it does business with, including suppliers, customers, consumers and employees. It shall comply with data privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

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- 13. NON-RETALIATION** – The Company shall ensure that there is have a process for its personnel to be able to raise any concerns without fear of retaliation.
- 14. CONFLICT OF INTEREST** – The Company shall not tolerate any form/act of employees that will compromise the Company’s interest for their personal gains.
- 15. WHISTLE BLOWER AND ETHICS ESCALATION POLICY** – The Company shall encourage ethics escalation within the Cirtek Group while protecting the whistle blower. The policy states the procedure for the reporting of any illegal, dishonest and fraudulent activity and violation of Company policies, rules and regulations.
- 16. ANTI-BRIBERY POLICY** – The Company shall ensure compliance by its officers and employees with Anti-Bribery Policy of the Cirtek Group and all relevant anti-corruption laws and regulations of the Philippines and other countries which the Company does business with.
- 17. RELATED PARTY TRANSACTIONS (RPTs) POLICY** – The Company shall ensure that RPTs are at arm’s length, the terms are fair, and they will inure to the best interest of the Company and its subsidiaries or affiliates and their shareholders. RPTs shall be reviewed, approved and disclosed in accordance with this Policy consistent with the principles of transparency and fairness.