



METRO PACIFIC INVESTMENTS CORPORATION
Anti-Bribery and Anti-Corruption Policy

Section 1. Adoption of Policy. Metro Pacific Investments Corporation is committed to continuously improve its governance practices and for this purpose, hereby adopts this Anti-Bribery and Anti-Corruption Policy (the "Policy"). This Policy shall be read in conjunction with the Company's Code of Business Conduct and Ethics, Policy on Gifts, Entertainments and Sponsored Travel, Whistleblowing Policy and other related policies.

Section 2. Statement of Principle. The Company has a zero-tolerance approach to bribery and corruption. Common examples of corruption include the following: extortion, fraud, insider dealing, money laundering, kickbacks, and facilitation payments. All forms of bribery and corruption are unacceptable and will not be tolerated. The Company's employees must not act corruptly in their dealings with any other person, and must ensure that any third party acting on its behalf complies with these standards.

Section 3. Definition of Terms.

- (a) Corruption is the misuse of public or professional power for personal gain.
- (b) Bribery refers to the offering, giving, soliciting, or receiving of any item of value as a means of influencing the actions of an individual holding a public or legal duty. This type of action results in matters that should be handled objectively in a manner best suiting the private interests of the decision maker. Bribery constitutes a crime and both the offeror and the recipient can be criminally charged.
- (c) A facilitation payment is akin to a bribe. It is a financial payment that is made with the intention of expediting an administrative process. It is a payment made to a public or government official or counterparty that acts as an incentive for such party to complete some action or process expeditiously, to the benefit of the party making the payment.

Section 4. Policy. Neither the Company nor its employee may give or receive, whether directly or indirectly, bribes or other improper advantages such as facilitation payments for business or personal gain. This includes improper payments to or from any individual person, any government official or any organization, corporate or otherwise. Neither the Company nor its employees may participate in any form of corruption including but not exclusive to extortion, fraud, insider dealing, money laundering, kickbacks, and facilitation payments.

The Company's employees shall not directly or indirectly, offer or give, or request or receive any gift or payment which is, or may be construed as being, an attempt to influence decisions related to the Company's business.

Hospitality and gifts may be offered and received only in the normal course of business and should not be seen to generate any actual or perceived conflicts of interest. Any hospitality or gifts should not be excessive or regular and must be in accordance with the Company's Policy on Gifts, Entertainments and Sponsored Travel.

Where the Company engages third parties such as agents, distributors or joint venture partners, the Company shall conduct sufficient due diligence when entering into arrangements to ensure that they are not acting corruptly, and to periodically monitor their performance to ensure continuing compliance.

Any demand for or offer of a bribe must be rejected immediately and reported to the Chair of the Company's Audit Committee as described in the Company's Whistleblowing Policy.

Section 5. Disciplinary Consequences. In cases when bribery, facilitation payment or other corruption is deliberately concealed or continues after it is discovered, disciplinary action may be invoked up to and including termination.

Section 6. Trainings. The Company shall conduct regular trainings and orientations for first time and fulltime employees to ensure continuous relevance and awareness of this Policy.

Reviewed by:



Retired Chief Justice Artemio V. Panganiban
Chairman, Governance and Sustainability Committee

Approved by:



Manuel V. Pangilinan
Chairman of the Board