

ABOUT THE CODE

Our PhilPacific Insurance Brokers & Managers, Inc. (“Philinsure”) Code of Conduct serves as an essential resource to secure our daily business interactions are conducted with respect and integrity. The Code of Conduct clearly communicates to each of us that the way we achieve our business results matters.

Our Code applies to all team members, directors, officers, and its partner. The Code applies to everything that we do and reflects our Company’s commitments to its employees, its shareholders, to the communities in which we work, and to our Company itself. Our Code represents our overall commitment to working ethically and with integrity in all that we do.

Positive behavior is a key expectation from all employees of Philinsure. It reflects trustworthiness, respect, responsibility, fairness, *Malasakit*, and citizenship. Employees are expected to fully participate, follow all corporate guidelines, as specified in the Code, Company Policies, Company Manual and procedures. Employee must behave appropriately to ensure that Philinsure remains a high-quality learning organization and is able to sustain excellent professional service and experience for all its employees.

The Compliance Officer is in charge for the administration of our Code reports to the Leadership team. Any charge of breach must be reported to your immediate supervisor/manager and Human Resources and Corporate Communications or Compliance team and will be the one to investigate, and acted upon by the management, based on the finding of the investigation.

To demonstrate our commitment to abide by the Code, the Company requires all employees to certify their acceptance to adhere to the Code of Conduct upon hire and annually thereafter.

If you have any clarifications or concerns about interpreting or complying with the Code of Conduct or any related Philinsure policy or procedure, you should discuss the situation with your manager, Human Resources & Corporate Communications, and Compliance Officer.

LIVING OUR VALUES

By living our Philinsure Values of Service Excellence, Entrepreneurial Spirit, Integrity, and Family Oriented we create a culture in which people act as a team, working together toward common goals. Philinsure four core values are part of everything we do.



a. Excellent and Personalized Service which means:

- Presenting myself and behaving professionally at all times;
- Constantly finding better ways of doing things in line with our pursuit of excellence;
- Attention to detail and strategic information for both internal and external clients;
- Committed to the well-being of our Clients, Insurers, Adjusters, Team Philinsure and the community;
- Committed to the concerns for our (internal and external) clients' and stakeholders' welfare and protection (*Malasakit*).



b. Entrepreneurial Spirit which means:

- Committed to being Entrepreneurial and focused on business development and growth;
- Committed to constant improvement in our professional and personal lives;
- Opportunity-seeking and strengths-focused;
- Able to build on and grow from each other's strengths.



c. **Integrity** which means:

- Commitment to Good Corporate Governance and Integrity;
- Trust-worthiness in small and large things (ex. care for corporate property as entrusted to me; being mindful of my own belongings and corporate materials under my accountability, whether within or outside company premises; appropriate use of company facilities);
- Keeping confidential critical corporate information and not engaging in unauthorized reproduction or disclosure of the same;
- Not engaging in activities or behavior that may undermine the interests of the company.



d. **Being Family-Oriented** which means:

- Commitment to working as part of one TEAM Philinsure (Together Everyone Achieves More);
- Helping ensure that each member of the Philinsure family is able to provide time for his or her family, the way we individually desire to do so;
- Looking after the safety and well-being of each member of the Philinsure family.

RESPONSIBILITY OF PHILINSURE MANAGER

CODE OF CONDUCT

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We look to Philinsure managers to lead responsibility by setting the example and demonstrating sound decision-making. As such, managers are expected to be familiar enough with the Code to effectively communicate its guidelines and answer questions to those who reports to them. Managers are encouraged to create a comfortable work environment that encourages employees to come to them with questions or concerns. Managers have a responsibility to be alert and sensitive to situations that could result in actions that might violate our Code, company policies or laws and regulations and report them promptly to their supervisors in order for our Company to be timely notified of possible violations.

Additionally, managers have duties under our Code. These include leading by example; reiterate the importance of ethical values and Company's commitment to ethical behavior; and maintaining a workplace environment in which employees feel comfortable raising concerns. At Philinsure, ethical leadership is critical to maintain the Company's reputation for integrity.

RESPONSIBILITY OF PHILINSURER TEAM MEMBER

Philinsurers shall live Philinsure Values to maintain our strong culture, which is based on integrity, ethical behavior, and a commitment to do the right thing. Philinsurers are encouraged to maintain the highest ethical standards and demonstrate ethical leadership. Philinsurers shall comply with Philinsure policies and Code of Conduct. If employee is uncertain, ask questions and consult with manager, Human Resources & Corporate Communications, Compliance Officer or whoever is best equipped to provide advice.

PENALTIES FOR VIOLATING OUR CODES

Each Philinsurer must comply with this Code, and with all Company policies. If we fail to do so, we may face corrective action, possibly including termination. Likewise, any supervisor, manager, officer, or director who is aware of any breach and does not promptly report and correct it may be subject to similar consequences.

UNDERSTAND OUR CODE

1. Read, understand, and abide by the requirements of the Code of Conduct.
2. Do your part in enforcing compliance with our Code of Conduct.
3. Embrace our Company's commitment to integrity and malasakit.
4. Foster a culture that prevents retaliation against anyone who reports actual or suspected violations of our Code.

EQUAL OPPORTUNITY

Our Company follows the laws that prohibit discrimination in employment practices, wherever we do business. It is our Company's policy to provide equal employment opportunities and to treat candidates and employees without illegal bias. It is our policy that no one at our Company should ever be subject to discrimination on the basis of: gender, race, age, sexual orientation, religion, national origin, marital status disability or appearance; or any other basis protected by law. This means Philinsurer may not tease, hurt or bully anyone, or use language, gestures or actions that will hurt others. When faced with a situation where a team member violates these rights, Philinsurer shall report the same to the Human Resources & Corporate Communications team for appropriate disciplinary action. Disciplinary action will vary based on the degree of offense and will be determined subject to management prerogative.

DATA PRIVACY AND DATA PROTECTION

Our Company respects the confidentiality of our employees' personal information. This means that only employees who have authorization and a clear business need should have access to personal records. Privacy protection is important. We manage your personal information consistent with these guiding principles: keep employee records up to date; prevent disclosure to third parties except permitted by the authorized individual; permit access and use for legitimate purposes (company benefits and payroll management); promptly respond to any questions raised by employees about their records.

MAINTAINING HIGH QUALITY SERVICE & SAFETY

We maintain our Company's valuable reputation by providing safe, quality products and services. This means that our products and services must respond to important client needs, must represent superior value to the customer, and must be reliable. We ensure this by following all quality process and safety requirements in place in the locations where we work. We also comply with all applicable standards and regulations on the development of our products and services.

At our Company, we pride ourselves in offering the highest levels of quality products and services. We strive for excellence in achieving and optimizing business results, which reflect total quality commitment to our clients and partners.

COMPANY'S PROPRIETARY INFORMATION

Our Company is built upon years of hard work and innovation by our employees and the proprietary information created by them, including such things as trademarks, copyrights, trade secrets protecting our intellectual or proprietary information is of critical importance, and we must all act collectively to ensure that it is not misused or misappropriated. Protection of proprietary information plays a vital role in our continued growth and ability to compete. You should never allow our proprietary information to be used or shared with people outside of our Company without appropriate legal documents in place.

PHILINSURE'S OBLIGATIONS WITH RESPECT TO PHILINSURES PROPRIETARY INFORMATION

One of the ways we protect our intellectual or proprietary information is by keeping that information confidential. Thus, every employee is required to sign a Data Privacy & Confidentiality agreement. By signing this agreement, each employee agrees to protect the confidential information of both our Company and others with whom our Company does business. Our Company has substantial relationships with its clients, insurers, and partners, which our Company expends significant time and resources to acquire and maintain. The particulars of these relationships are Company confidential information and constitute a significant and valuable asset of our Company. Employees shall not, during or after their employment with our Company, use their knowledge of these relationships for any entity other than our Company.

Our Company recognizes that, as a result of their prior employment, our employees may have entered into a confidentiality agreement with that employer requiring that they keep in confidence that company's proprietary information. Employees must ensure that they do not violate any obligations of confidentiality to a prior employer in connection with their employment with the Company. This includes improperly disclosing or using, in connection with their employment with the Company, information that is subject to obligations of confidentiality to the prior employer.

RELATIONSHIP WITH THE COMMUNITY “Philinsure WeCARE”

We CARE, is the corporate social responsibility arm of PhilPacific Insurance Brokers & Managers, Inc. (Philinsure). WE CARE is aligned to Philinsure’s goal to help strengthen communities by building job-creating businesses and by rebuilding lives. Our business has gone from strength to strength continuously over the last 20 years. We recognize this blessing and on behalf of our shareholders, team members and clients, we are sharing what we have with our communities across all Philinsure branches.

REPORTING MISCONDUCT

Each team member is responsible to report any misconduct, including violations of this Code, that we become aware of multiple channels are available for this purpose. We encourage team members to help maintain the integrity of our Company by reporting any misconduct. To assist in these efforts, any employee of our Company may submit a complaint regarding instances of corporate fraud, or violation of applicable laws to the management of our Company.

If you become aware of a situation that may involve a violation of our Code, Company Policy or any applicable law and regulation, you are encouraged to report it by contacting your manager or Human Resources & Corporate Communications (HRCC)

HEALTH AND SAFETY

Our Company strives to ensure that we provide healthy and safe conditions on our premises by complying with applicable regulations and best practices applicable. We aim to provide an environment with no risk to our employees’ health and safety and provide access to care.

All team members are expected to follow safety protocols against communicable diseases to protect individual’s own health and health of our colleagues. Employee shall report to Human Resources & Corporate Communications team if any safety breach has been made by a colleague for appropriate disciplinary action. Employee shall provide assistance in any form to improve the condition of co-workers who are at risk of developing or with mental health condition and refrain in any discriminatory acts against them. Employee shall seek assistance from the company HRCC personnel/team leader on conditions which may be related to or may result to a mental health condition for their appropriate medical intervention and possible work arrangements and accommodation.