

#### CORPORATE POLICIES

## GIFTS / HOSPITALITY / ENTERTAINMENT

#### 1. **OBJECTIVE**

- 1.1. To provide guidelines on acceptance of and giving of gifts / hospitality / entertainment
- 1.2. To ensure that this does not lead to conflict of interest and improper influence of business judgement
- 1.3. To promote integrity in procurement practices and in selection of the most appropriate business partners for all Pacific Online Systems Corporation (POSC) projects and transactions

### 2. **SCOPE**

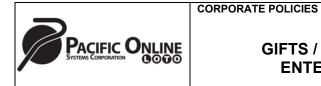
- 2.1. This policy covers all Directors, Officers and Employees.
- 3. Definition of Terms
  - 3.1. Gift anything of value such as, but not limited to, cash or cash equivalent, loans, fees, rewards, commissions, allowances, employment, travel, entertainment, sponsorship of personal events (like birthday, wedding, baptism, etc.), the use of property owned by business partners (like vehicles, beach houses, resorts, restaurants, bars, sports or recreational facilities), and special favors and privileges, whether for personal or business use.
  - 3.2. Business partner refers to clients, contractors, suppliers, banks and other entities engaged in business with the Company.
  - 3.3. Nominal value set at a maximum amount of Php2,000.00.

### 4. POLICY

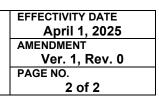
4.1. The Company prohibits direct/indirect solicitation of gifts, hospitality and entertainment from a business partner, by any director, officer, and employee of the Company. POSC personnel may accept corporate giveaways if the estimated value is Two Thousand Pesos (Php2,000.00) and below.

### 5. GUIDELINES

- 5.1. POSC personnel invited to travel for the purpose of attending trade shows, exhibits or the like, wherein products of business partners are featured, and/or for exposure to new techniques, products, and/or innovations, among similar purposes, said personnel are prohibited from accepting sponsored travel. Should the Company deem that such travel is necessary for the business and for the development and training of its personnel, POSC shall shoulder the cost.
- 5.2. In no case shall any POSC director, officer or employee accept travel and/or entertainment sponsored by any current or prospective business partner which is participating in any on-going bidding or selection process for any POSC project or transaction. Any exception from the foregoing should be authorized by the President or the Chairman.



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- 5.3. POSC personnel may accept corporate giveaways, raffle prizes, tokens or promotional items of nominal value (pens, mugs, notebooks, and the like), provided that the gift is voluntarily given by a third person without suggestion or solicitation, as a souvenir or out of courtesy;
- 5.4. And provided further, that the approximate value of the gift does not exceed Two Thousand Pesos (Php2,000.00). If the approximate value of the gift exceeds Two Thousand Pesos (Php2,000.00), it should be not be accepted, and should be immediately returned to its giver. In situations where it is deemed improper to refuse a gift, the issue shall be referred to HRM Department for proper disposition.
- 5.5. Gifts, hospitality and entertainment with estimated value of Php2,000.00 and above shall upon receipt, be registered with HRM Department. The registry must contain detailed description of the gift/hospitality/ entertainment, its source and the measures taken to dispose of it. (Refer to Item 6 below on Declaration Form)
- 5.6. Likewise, no POSC director, officer or employee shall perform such actions that may be considered corruption, such as the giving of gifts, hospitality and/or entertainment to any of the Company's various stakeholders.

#### 6. **DECLARATION FORM**

- 6.1. Declaration for gifts received <u>with estimated value of Php2,000.00 and above</u> shall be submitted, within the week received, via email TO: HRM Dept., CC: Employee's Dept Head.
- 6.2. Declaration form can be requested to Human Resources Management (HRM) Department.
- 6.3. Human Resources Management (HRM) Department shall submit a consolidated report to the President & CEO whenever there is an instance that arises.

For questions and/or clarifications, please email us at hrmd@pacificonline.com.ph

PREPARED BY:	RECOMMENDED BY:	APPROVED BY:
Annabelle L. Forte	Michelle Angeli T. Hernandez	Armin Antonio B. Raquel Santos
HRMD Head	Compliance Officer	President & CEO