

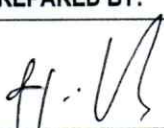
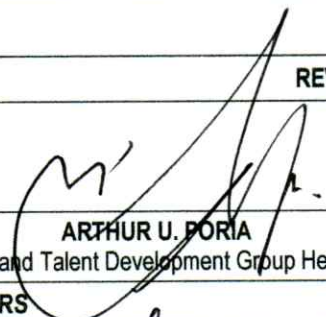
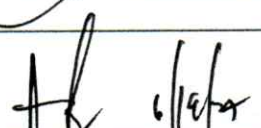
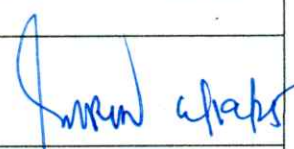
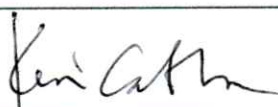


POLICIES AND PROCEDURES

Policy No.	SAFCHR-2025-042	Policy Title	ANTI-BRIBERY AND CORRUPTION POLICY
Issued Date	JUNE 19, 2025	Effectivity Date	JUNE 19, 2025
Last Revision	N/A	Superseded Policy/ies	N/A
Responsible Person/s / Office/s	ALL EMPLOYEES	Total No. of Pages	2 pages, including this page

REVISION HISTORY

Revision Number	Effective / Revision Date	Description	Sections Affected	Prepared / Revised by:	Approved by:
N/A	N/A	N/A	N/A	N/A	N/A

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	POLICIES AND PROCEDURES		Policy No. SAFCHR-2025-042
	Title: ANTI-BRIBERY AND CORRUPTION POLICY	Page: 2 of 3	Effectivity Date: JUNE 19, 2025

SAFC is committed to an honest, prudent, and responsible conduct of business and aims to continuously improve and maintain a high level of professional working environment across all level of departments.

All employees, including accredited partners acting on behalf of the company, are expected to act with the utmost personal and professional integrity. Upholding our integrity and reputation must never be jeopardized, even for the apparent benefit of the Company, and more so for individual and personal gains.

I. OBJECTIVE

This policy aims to prohibit any form of unauthorized solicitation from sales partners, clients, and customers, including all forms of bribery and corrupt practices.

II. DEFINITION OF TERMS

Anything of value	- Anything tangible or intangible that may be presented as an advantage or benefit, either financial or non-financial to the recipient.
Bribery	- Is the offering, promising, giving, transferring, authorizing exchange of, agreeing to accepting, receiving, soliciting, requesting anything of value, in order to improperly persuade, influence or to secure, obtain or retain undue advantage that may be perceived as illegal, unethical, morally unacceptable based on existing social norms, and/or breach of trust.
Corruption	- An abuse of entrusted power or position for private gain or any forms of undue advantage by an individual or an organization. Corruption entails a wide range of illegal actions where entrusted power is abused for personal gain, such as but not limited to bribery, embezzlement of funds, trading in influence, abuse of position or function, illicit enrichment, concealing or obstruction of justice related to the foregoing.
Donation	- A voluntary contribution to a fund or cause, typically for charitable reason, for which nothing is asked in return.
Entertainment	- is a hospitality, where the donor is present when the hospitality is provided to the recipient. If the donor is not present, the hospitality is considered to be a gift. Hospitality may be provided to be in the form of but not limited to meals and drinks, tickets to events, invitations to concerts or exhibition, visit to theatres, sporting events, and the like.
Facilitation Payment	- Also known as expediting payments (lagay), are payments made to expedite or secure the performance of a routine.
Gift	- Is of anything in value, other than entertainment, provided from one party to another without expectation of a return benefit. Identical items that are widely distributed and of nominal value (e.g, pens, promotional materials, desk sets, items with corporate logo) are not considered to be gifts.
Sponsorship	- Are purposeful partnership or initiative that drives brand engagement. To which funding is extended for one-off events or short-term projects.
Solicitation	- Any form of request or invitation initiated by an employee, whether for personal or company related activity. Monetary Solicitation is a cash support requested by an employee to help finance a particular activity or personal gain or purposes. Non-Monetary Solicitation is any non-cash support (e.g. gift packs, vouchers, liquors, travel incentives) requested by an employee for a particular activity or for personal gain or purposes.

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III. GENERAL GUIDELINES

a. Zero Tolerance for Bribery and Corruption

- i. The Company strongly prohibits all forms of bribery and corruption in all its dealings and transactions.
- ii. The Company likewise prohibits all types of facilitation payments as these are considered bribes.
- iii. Accommodating payment(s) for the client/customer by an employee using the latter's personal bank account is strictly prohibited. Client/customer's payment shall be made directly to the bank account of the Company.
- iv. Any collected excess payment of the client/customer due to change of policy shall be returned immediately. Unreturned amount without valid reason shall be construed as act of corruption.
- v. All employees and third parties acting on behalf of the Company have the responsibility to promptly report any suspected and actual violations of this policy without fear of any adverse consequences.

b. Prohibited Solicitation Activities

- i. Employees are prohibited from engaging in any solicitation activities. In the event where a client/customer voluntarily offered a monetary gift, cash or property donation, the employees must politely turn down the offer.
- ii. Employee must not intimidate, force or coerce any client/customer to donate or participate in any solicitation activity.
- iii. Solicitation through all ways (personal, email, phone calls, social media, other electronic means) using company name and activities is strictly prohibited.
- iv. Solicitation for sponsorship activities not related to SAFC and its activities is strictly prohibited.

c. Special Condition for Offering and/or Receiving a Gift, Entertainment, or Anything of Value

- i. Gifts that are offered to the Company and addressed to a company office representative (c/o) for the same purpose as a corporate raffle or for company event may be accepted.
- ii. Gifts presented as personal gifts to a company officers and its representative during celebration season (like Christmas, Father's Day, Mother's Day, Birthday) or a token of appreciation may be accepted provided that the gift is non-cash or equivalent to cash (e.g. bank check, e-money, stocks, real properties, movable properties, and the like).
- iii. A gift received or offered should not create conflict of interest or perception thereof.

IV. EXEMPTIONS

- a. Internal communications related to Company-sponsored events, initiatives, or official announcement.
- b. Solicitation activities organized by the Company for charitable or corporate social responsibility (CSR) is permitted if with approval of the management.

V. POLICY ENFORCEMENT

- a. The reported incident of any misconduct will be appropriately investigated, addressed, and rectified.
- b. Violations of this policy shall result to an appropriate disciplinary action in accordance with the Code of Conduct