



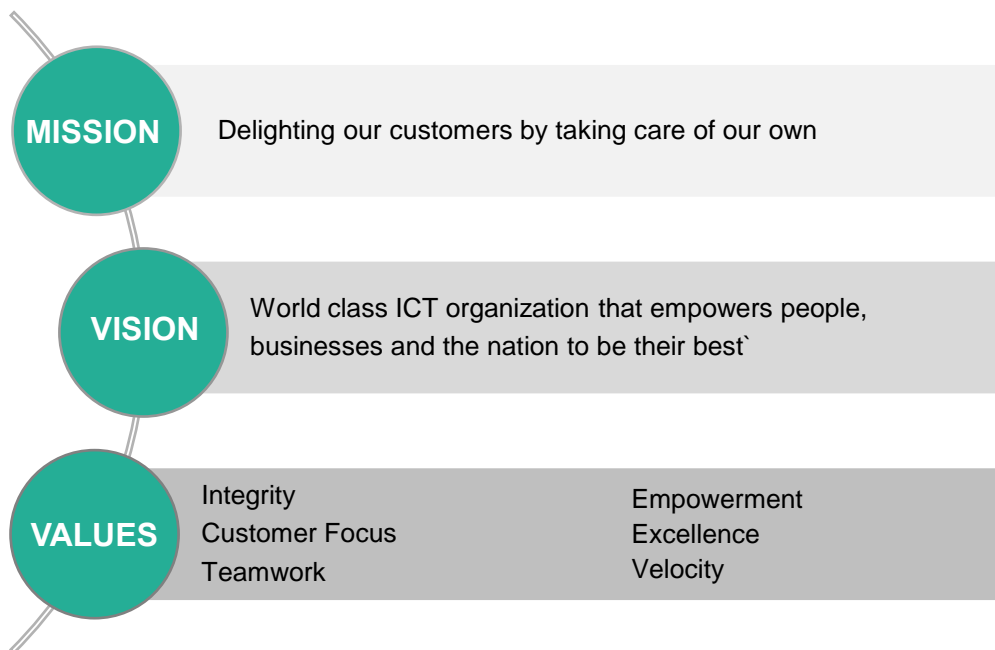
# ***Code of Business Ethics***

***POLICY***

## 1. Integrity in Action

Converge Information and Communications Technology Solutions Inc., as well as its subsidiaries Metroworks ICT Construction Inc., Pentagon Holding Co. Inc., and its affiliates, collectively referred to herein as “Company” or “We” shall continue its commitment to ethics and compliance, requiring **100% integrity** in all business practices. The Company management expects all employees to comply with applicable legal and company requirements. Any identified violations shall be addressed swiftly, consistently, and fairly.

Focus on our Mission, Vision and Values!



Company shall also continue to enhance its comprehensive communications campaign promoting exemplary business ethics. The main purpose is to highlight the importance of establishing and maintaining a corporate culture of integrity. Particular attention in communicating with people managers, who have a significant impact on the behavior of employees in dealing with customers, vendors, government authorities and others external entities, need to be observed.

### 1.1. OUR CODE OF BUSINESS ETHICS

Company Code of Business Ethics builds on our main core values by enabling employees to understand the expected behaviors that drive our culture of compliance, ethical conduct, and accountability.

Following your moral or ethical convictions and doing the right thing in all circumstances, even if no one is watching you, is **INTEGRITY**. It starts with a simple proposition: we always act with integrity and we always act in compliance with the law. Besides doing the right thing and protecting our company, acting with integrity and in compliance with laws improves our performance and reflects on our character as a business—to our clients, our business partners and the public at large—and enables us to attract and retain top talent.

That is why We are putting **Integrity into Action!**



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## 1.2. WHO MUST COMPLY?

Our Code of Business Ethics applies to all Company directors, officers, and employees. In addition, third parties, such as consultants, distributors, agents, and suppliers, are required to adhere with the Code of Business Ethics when acting on the Company's behalf.

## 1.3. MANAGING OUR COMPLIANCE OBLIGATIONS

### 1.3.1. Act ethically and comply with the law, the code of business ethics, and Company policies

Everyone who is working for the Company should have a personal responsibility to always act ethically and comply with the law, the Code of Business Ethics, and Company policies and procedures. Violations may result in individual disciplinary action including termination of employment, and legal liability. In some cases, Company may have a legal obligation to report the results of an investigation to the appropriate law enforcement authorities.

Company's core values and ethics are consistent. We recognize that some business cultures have practices that may violate our core values and ethics. Doing the right thing often requires courage. Saying no to these practices does not mean we disrespect those cultures.

### 1.3.2. Understand and follow Client Code of Conduct where applicable

It is also our responsibility to understand a Client's Code of Conduct in addition to following our own Code of Business Ethics. There may be restrictions on, for example, gifts, entertainment, and physical security that are more limiting than our own, and if so, we follow them in connection with the client engagement.

When compliance is not possible, we discuss with the client. A Client's Code of Conduct may appear to contradict our Code of Business Ethics—for example, it may include requirements we cannot follow because of practical limitations on how we do business, or provisions that do not apply to us. When faced with such situations, we will discuss with the client as appropriate and seek to comply with the spirit or key principles of its code, while always following our Code of Business Ethics. We also expect everyone to escalate and discuss with your leadership, Human Resources or Legal Department to resolve the issue. For example, we may need to include limitations or clarifications in our client agreements to comply with the obligations under the Client's Code of Conduct.

### 1.3.3. Cooperate with investigations

We cooperate fully with all investigations. When reporting an ethical concern, cooperation is necessary so that we may adequately address the concern. While we will always respect the right to report using the Compliance Email Address anonymously (where permitted), COMPANY may require or request additional information in some cases to properly investigate the matter.

### 1.3.4. Ask questions

If you have any questions about your responsibilities or any of the information in the Code of Business Ethics, please ask your Department Head, any Company Leader, Human Resources or Legal Department. You can also submit any questions directly to the Compliance Group through its email address [compliance@convergeict.com](mailto:compliance@convergeict.com).

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## 2. Make Valuable Decisions

Making valuable decisions requires us to balance the seemingly contrary forces of emotion and rationality. Not every issue that comes up has a clear path to resolution. In difficult situations, use judgment and involve others to help make better decisions.

Before making any conduct or decision ask the following questions:

- **Duties under the law** - Could it be against the law?
- **Duties to the company** - Could it violate our core values, Code of Business Ethics or Company policies? Could it cause harm to Company's brand, reputation, or financial performance?
- **Duties to others** - Could it breach an obligation to a client or other business partner (for example, contracts or client codes of conduct or policies)? Could it cause harm to any person, or to individual's reputation?

If the answer is "Yes" to any of the questions above, do not do it.

If unsure, ask your Department Head, any Company Leader, Human Resources or Legal Department. If you feel uncomfortable asking a question or raising a concern via these channels, contact Compliance at [compliance@convergeict.com](mailto:compliance@convergeict.com).

## 3. How to Bring Up your Concern?

Speak up if you experience or witness disrespectful, inappropriate, fraudulent, unethical, or illegal behavior, including concerns about retaliation. Company provides options for employees to report suspected violations of law or company policies without fear of retaliation.

There are many ways to raise a concern, and the most effective way may depend on the nature of the concern. You may raise a concern to:

- Your Department Heads
- Any Company Leader
- Human Resources Department
- Legal Department; or
- The Compliance Group at [compliance@convergeict.com](mailto:compliance@convergeict.com).

You can always escalate your concern without fear of retaliation if you do not receive an acceptable response from your first point of contact. In some cases, you may remain anonymous.

## 4. Seven Essential Behaviors

Company Code of Business Ethics is organized under seven (7) essential behaviors that apply to our day-to-day actions.

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## 4.1. ETHICALLY CONDUCT YOURSELF

Honesty, synergy and quality are at the heart of Company's culture and grounded in our core values. Making your conduct count ethically is about fostering these values and conforming to behaviors that is expected from you. There are five ways on how you can ethically conduct yourself:

### 4.1.1. Speaking Up and Zero Tolerance for Retaliation

We speak up about concerns knowing our company never tolerates retaliation. Company has zero tolerance for retaliation against anyone who speaks up in good faith.

#### 4.1.1.1. Speak up about disrespectful, inappropriate, fraudulent, unethical, or illegal behavior

Retaliation means any kind of unfair treatment, whether subtle or overt. There are serious consequences for retaliation, up to and including dismissal.

If you have a concern about disrespectful, inappropriate, fraudulent, unethical, or illegal behavior of any kind, our company encourages you to speak up. You can always escalate your concern without fear of retaliation if you do not receive an acceptable response from your first point of contact. We take all concerns raised seriously, including allegations of retaliation against anyone who speaks up in good faith.

The way Company handles a concern will depend on its nature and severity. We may have discussions with relevant work colleagues, Company Heads or Human Resources Department, and conduct formal investigations. Regardless of how you raise a concern, We always seek to ensure it is handled by the most appropriate people within our company— with confidentiality and sensitivity.

#### 4.1.1.2. Take action

Act or reach out for guidance when approached about a concern involving disrespectful, inappropriate, fraudulent, unethical, or illegal behavior. No matter the career level, we take concerns seriously and act, or otherwise raise them via the appropriate channels.

Company Leaders represent the highest standard of respectful behavior.

### 4.1.2. Respect for the Individual

Harassment based on a person's characteristics—known as protected characteristics is illegal in many jurisdictions. Disrespectful behavior is also potentially illegal or legally actionable in many jurisdictions. Company's ethical values go beyond what the law requires. We want a workplace that is free from any form of disrespectful behavior or harassment, whether it is covered by law or not.

Disrespectful behavior or harassment of any kind are not tolerated by Company. It does not always matter whether the disrespectful behavior or harassment is intentional, what matters is how the behavior is received by the impacted individual. If it is reasonably perceived as disrespectful, it is prohibited by Company.

Disrespectful behavior and harassment take many forms. They consist of behaviors that interfere with work performance, or any other treatment of a person that creates an intimidating, hostile or offensive work environment.

Disrespectful behavior and harassment can occur in many contexts, including but not limited to:

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- Something someone says or does (or does not say or do), whether in person or remotely
- An email, letter, or document
- A posting on the internet or intranet (for example, on Facebook or Twitter or on a blog)
- A message sent by instant messenger applications (for example, on Skype, Viber, or WhatsApp)
- A physical gesture

We do not harass any person based on these characteristics: Race, religion, creed, color, sex, pregnancy, maternity, marital or family status, age, physical or mental disability, ancestry, genetic information, national or ethnic origin, citizenship status, sexual orientation, gender identity or expression, political belief, trade union membership, veteran status or any other status protected by applicable local law.

We expect all our people, regardless of career level or role, to treat each other and individuals we interact with in work-related situations (whether in person or online) with respect and professional courtesy. This includes client and supplier personnel.

Company Leaders play an important role in setting the tone from the top and ensuring we maintain a respectful, ethical, and fair work environment. Company encourages its Leaders to set an example in work/life balance and all employees to be respectful of others' work/life balance needs. Company Leaders also have a responsibility to always act if they witness, or become aware of, inappropriate or disrespectful behavior, or retaliation, and to encourage their teams to do the same.

Some examples of disrespectful behavior and harassment:

- Repeated shouting at employees in public or private or excessive use of profanity/swearing directed towards an individual and/or an individual's work product.
- Targeted vulgarity and rudeness, personal insults, or name-calling or public or private humiliation and/or intimidation.
- Uncontrollable and threatening anger directed towards an individual.
- Repeated, blatant disregard by an individual for another person's personal time.
- Spreading rumors with a deliberate intention to cause harm to an individual, or persistent, unjustified, and/or unnecessary negative attacks on a person's personal or professional life.
- Deliberate and blatant disrespect to differences in culture or religion.
- Deliberate exclusion or continued isolation from work social activities.
- Unwanted physical contact.
- Sending, taking, or displaying sexually suggestive, lewd, and/or indecent pictures or other materials.
- Sexually suggestive, lewd, or indecent comments or jokes (directed at a person or made more generally);
- Repeated unwanted attention, such as phone calls, texts, or messages to an individual without a work-related reason for the contact.
- Abuse of authority (including use of intimidation, threats, blackmail, coercion, or requiring an individual to perform purely personal errands or tasks).
- Threats of dismissal, loss of promotion, depriving someone of work opportunities or other negative consequences, which are not consistent with our principle of meritocracy.
- Bullying, "mobbing" or abusive behavior (in each case, by one or more individuals); "bullying" means behavior, directed against someone, that is intimidating, offensive or malicious and that undermines the confidence and self-esteem of that person; and
- Threatened or actual violence whether directed at an individual.

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## 4.1.3. Advocates of Company

We are proud to be advocates of Company, and we act accordingly. Whether at work, traveling on business, communicating online, or attending training or social events with colleagues or clients, we are always advocates demonstrating the Company Way. Our behavior reflects both on ourselves and on Company. We conduct ourselves in accordance with the highest standards of professional behavior. Good professional conduct is especially important because our individual behaviors impact our colleagues, our clients, our communities and ultimately, the success of our company.

Company Leaders especially are expected to model positive professional behaviors, inspire and motivate others, and drive a collective sense of purpose and collaboration in the work we do for our clients.

## 4.1.4. Meritocracy and Non-Discrimination

We apply a principle of meritocracy when we make decisions about our people. We do not discriminate based on a person's characteristics.

### 4.1.4.1. Apply the principle of meritocracy

Meritocracy means that all employment decisions must be based only on an individual's demonstrated contributions and capabilities within the context of meeting Company's business needs. This applies to any decision about recruitment, hiring, compensation, promotions, performance, and work assignments.

### 4.1.4.2. Value diversity and do not discriminate

Company values different cultures strive to have a diverse and inclusive workforce and meets legal hiring mandates where required.

Many laws around the world prohibits discrimination against people based on certain characteristics. We expect our people to comply with such laws against discrimination, but Company's ethical values go beyond legal requirements: we each have a responsibility to support and promote our principle of meritocracy to maintain a fair and positive work environment.

We do not discriminate against any person based on these characteristics: race, religion, creed, color, sex, pregnancy, maternity, marital or family status, age, physical or mental disability, ancestry, genetic information, national or ethnic origin, citizenship status, sexual orientation, gender identity or expression, political belief, trade union membership, veteran status or any other status protected by applicable local law.

## 4.1.5. Personal Conflicts of Interest

We ensure our personal interests and relationships do not create conflicts for Company.

### 4.1.5.1. Identify personal conflicts of interest

A personal conflict of interest is a situation where your own personal interests (or those of a family member or a close friend) can affect your ability to act in Company's best interests or interfere with your personal objectivity and obligations to Company.

Acting in Company's best interests means:

- We do not compete with Company.

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- We do not use Company's property or information, or our position, for our own personal gain (or that of family members or close friends); and
- We do not take opportunities for ourselves (or family members or close friends) that we discover using Company's property, information or otherwise through our position at Company.

Our business is built on trust-based relationships – conflicts of interest risk undermining that trust. A failure to avoid, or properly deal with, a personal conflict can cause serious consequences both for Company and you personally.

A personal conflict can arise in many different situations. Each of us is best qualified to identify when there is a personal conflict. Therefore, it is important to use good judgment to identify actual, potential, or perceived personal conflicts of interest.

As a result of personal conflicts of interest:

- People could question your integrity and therefore your reputation, and whether they want to work with you, or do business with Company.
- Company's reputation or client relationships could be damaged.
- Company could lose future business opportunities.
- It could lead to disciplinary action being taken against you (up to and including, termination of employment)
- Company could face litigation resulting in liability for Company (or individuals), including criminal and financial penalties

Examples of situations that may present a personal conflict of interest:

- Personal investments or those of family members.
- Outside activities.
- Membership on boards of directors or advisory boards.
- Charitable activities.
- Starting a business - If an employee uses skills that they have learned at their job to start a competing business this could qualify as a conflict of interests.
- Employment outside Company - Being employed (you or a close family member) by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, or any education or publishing concern that may stand to gain from influencing information in our publications regardless of the nature of the employment.
- Employee personal relationships, this may include but is not limited to the following: family members, family relationship up to third-degree, boyfriend/girlfriend, best friend, or any relationship that blossomed in the office.
- Family member works or performs services for a competitor.
- Family relationship reporting to each other; and
- Customer or supplier with which an employee has business dealings.

#### 4.1.5.2. Disclose personal conflicts of interests, get the necessary approvals, and follow any restrictions

We understand that personal conflicts occasionally arise in the ordinary course of business. When faced with a personal conflict of interest, the most important thing is to tell us about it as

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soon as you can, obtain any required approvals, and follow any restrictions. A personal conflict of interest is often easy to resolve when it is disclosed early enough.

## 4.2. ADHERE TO LAWS

We comply with all laws, whether local, national, regional, and international. Company and those who are acting on our behalf, are responsible for understanding the applicable rules and must work with Legal Department to ensure compliance. Violations of law can result in significant harm to Company, including financial penalties, denial of government contracting privileges, imprisonment for criminal misconduct, and damage to our business relationships and reputation.

### 4.2.1. Anti-bribery/Anti-corruption

We do not give or accept bribes including inappropriate gifts, meals, entertainment, or travel, and we get approval before offering any gifts, meals, entertainment, or travel to Government Officials.

We do not use or allow third parties to give bribes or make questionable payments on our behalf, and we only work with approved Third-Party Intermediaries (TPI).

We follow Company's procedures on interacting with Government Officials and rules regarding political contributions and campaign activities.

#### 4.2.1.1. Comply with anti-corruption / anti-bribery laws without exception

Company's stance on corruption or bribery is very simple: Corruption is wrong, it is against the law, and we do not give or accept bribes. We comply with anticorruption laws, without exception, regardless of local business culture or practices. Even if our competitors give bribes or make questionable payments, Company has zero tolerance for bribery or any other activity that violates these laws.

Examples of anti-corruption laws with which We comply:

- **Presidential Decree No. 46** - Making it punishable for Public Officials and Employees to receive, and for private persons to give, gifts on any occasion, including Christmas.
- **Presidential Decree No. 807** – Providing for the organization of the Civil Service Commission in accordance with provisions of the Constitution, prescribing its powers and functions and for other purposes.
- **Revised Penal Codes** -
  - Republic Act No. 6713: Code of Conduct & Ethical Standards for Government Officials & Employees
  - Republic Act No. 3019: Anti-Graft and Corrupt Practices Act
  - Republic Act No. 948: Anti-Red Tape Act
  - Act No. 3815, The Revised Penal Code of the Philippines
- **The Foreign Corrupt Practices Act of 1977, as amended** – A United States law that prohibits U.S. firms and individuals from paying bribes to foreign officials in furtherance of a business deal.
- **The Organization for Economic Cooperation and Development's Convention on Combating Bribery of Foreign Public Officials in International Business Transactions.**

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### 4.2.1.2. Do not give or accept bribes

We pride ourselves in our relationships with our clients and understand that cultivating those relationships often is best accomplished in social settings such as meals, sporting events or other forms of entertainment. While ordinary relationship-building activities including gifts, meals, and entertainment can be appropriate, we must also remain vigilant to ensure nothing we do could create even an appearance of impropriety.

Philippine Republic Act No. 3019 (The Anti-Graft and Corrupt Practices Act) enumerate certain acts of public officers that constitute graft or corrupt practices. Republic Act 6713 (The Code of Conduct and Ethical Standards for Public Officials and Employees) prohibits public officials and employees from soliciting or accepting, directly or indirectly, any gift, gratuity, favors, entertainment, loan or anything of monetary value from any person and Presidential Decree No. 46 (Giving of Gifts on any Occasion) punishes the act of giving, or offering to give, to a public official or employee, a gift, present or other valuable thing on any occasion, including Christmas.

Examples of "other valuable thing" include:

- Gifts or gift baskets.
- Meals or drinks.
- Entertainment such as theater and sports tickets.
- Client travel expenses.
- Invitations to marketing events; and
- Intangibles, such as personal favors, loans, or preferential treatment in connection with employment and internships

### 4.2.1.3. Do not give inappropriate gifts, meals, entertainment, or travel

Under anti-corruption laws, it is illegal to offer or give gifts, meals, entertainment, or travel if done with a corrupt intention. A corrupt intention means that the goal in giving the gift, meal, entertainment, or travel is to influence someone to misuse their position to benefit COMPANY.

Before providing or accepting any gift, meal, entertainment or travel, check if the gift meets the criteria:

- For a proper purpose and not intended to secure an improper advantage or otherwise inappropriately influence the recipient.
- Permitted by law.
- Permitted by our policies.
- Permitted by the recipient's policies and by any agreements between COMPANY and the recipient's employer.
- Reasonable in value and appropriate under the circumstances.

Many companies and government institutions have policies about what their employees may accept, and sometimes our contracts with clients or other parties specifically limit or forbid us from providing gifts, meals, entertainment, or travel to their employees. Because of this, employees and its management must review and confirm that the recipient's policies and contracts with Company allow us to give a gift, meal, entertainment, or travel before offering it.

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### 4.2.1.4. How do you determine if a gift, meal, entertainment, or travel is appropriate?

Before providing or accepting any gift, meal, entertainment, or travel, ask the following questions:

- Would it cause any embarrassment or concern for our clients, COMPANY or ourselves personally, if others learned about the gift, meal, entertainment, or travel?
- Would the gift, meal, entertainment, or travel appear to influence the recipient's objectivity?
- Would the gift, meal, entertainment, or travel be considered lavish or unreasonable?
- Is there a bid or sales opportunity pending with the recipient's company?

If the answer to any of these questions is "Yes", the gift, meal, entertainment, or travel is likely inappropriate.

### 4.2.1.5. Get approval from Legal and Compliance Department before providing any gifts, meals, entertainment, or travel to Government Officials

Government Officials (which include family members) are government employees or employees of organizations partially or wholly owned by the government. Providing a gift, meal, entertainment, or travel to a Government Official is permissible if the gift, meal, entertainment, or travel meets our criteria.

Government Officials include:

- Elected or appointed government officials
- Officers and employees of government agencies
- Employees of government, regional and municipal agencies
- Employees of entities that are partially or wholly owned by government, regional or municipal agencies
- Part-time legislators
- Political candidates
- Professors and administrators of public universities and government-operated hospitals

### 4.2.1.6. Carefully review TPIs before entering business with them

A Third-Party Intermediaries or TPI is an individual or company that interacts with our clients (such as business development agents, subcontractors, prime contractors, alliance partners, joint venture partners and suppliers) or represents Company before a government body (for example, to secure a license, visa, permit or other form of authorization; intervene in a regulatory matter; or influence a legislative action).

Before working with a TPI, the company must undergo the vendor prequalification process and due diligence process. The TPI must enter into a written agreement and be trained on applicable policies and guidelines on compliance.

Because Company can be held responsible for bribes given by TPIs on Company's behalf—even if we did not approve or know of their actions, we carefully review potential TPIs before entering business with them. To ensure we only work with reputable individuals and companies, we conduct due diligence on all TPIs prior to engaging them and repeat this

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process regularly for those individuals and companies with whom we have a long-term relationship.

#### 4.2.1.7. Follow Company's procedures on interacting with Government Officials

Employees who interact with Government Officials, or who supervise others who do, must understand, and abide by our procedures as well as the laws governing lobbying and contact with Government Officials, political contributions, and campaign activity. Generally, refrain from activities that could place COMPANY's name in a partisan political posture.

#### 4.2.1.8. Follow Company's rules regarding political contributions and campaign activities

To avoid the appearance of impropriety or to prevent conflicts of interest, we prohibit corporate political contributions to political candidates, political parties, or party committee on behalf of Company and its clients. This includes both monetary and in-kind donations, which are intangible assets such as time, use of equipment or technology (e.g., laptop, Company email).

### 4.2.2. Anti-Money Laundering

We do not engage in any money laundering or terrorist financing activities or assist any other party in doing so, we escalate any red flags that we identify for further investigation and we report suspicious activity to the government when required.

#### 4.2.2.1. Do not engage in any money laundering or terrorist financing activities or assist any other party in doing so

Company has zero tolerance for financial crime. This includes money laundering and terrorist financing. Company's most effective tool for detecting red flags is you.

"Money laundering" refers to converting money or assets obtained through criminal activity into assets that appear legitimate.

"Terrorist financing" refers to the use of money or assets, whether legitimate or obtained through criminal activity, to fund terrorist activities or groups. Money laundering and terrorist financing are linked because terrorism is more often funded by money or assets that were obtained illegally, but then laundered to appear as if they came from a legitimate business.

Company is at a higher risk of being exposed to money laundering and terrorist financing activities when we:

- Handle funds or process financial transactions or applications on behalf of clients.
- Conduct business in countries where there is little enforcement of laws prohibiting money laundering and terrorist financing activities.
- Conduct business in countries where financial transparency standards (e.g., bank secrecy) make it easier to hide these activities, and therefore they are more widely prevalent.

#### 4.2.2.2. Escalate red flags for further investigation and report suspicious activity to the government when required

Red flags are circumstances, activities, or events that due to their nature and the context in which they occur, could be a sign of money laundering or terrorist financing activity. Red flags do not have to be signs of actual money laundering or terrorist financing, and it would not be common

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to see this activity directly. They are more likely to be signs of other illegal activity, such as attempted fraud, which generate criminal proceeds.

If you identify a red flag, you are required to follow these three steps:

1. Escalate the red flag to your management, Human Resources or Legal Department or to the Company Ethics Committee Helpline. Even if you are not 100% sure the activity you identify is a red flag, raise your concerns.
2. If the red flag is part of a transaction or other approval process you perform, you must place the transaction or approval process on temporary hold.
3. Avoid notifying or “tipping off” clients or any other party that you are aware of potentially illegal activity as this may hinder the output of the investigation.

### 4.2.2.3. Comply with anti-money laundering laws diligently.

Company has zero tolerance with regards to financial crimes or to any action that violates the laws relating to Anti-Money Laundering and Terrorism Financing, including but not limited to:

- **Republic Act No. 9160:** Anti-Money Laundering Act of 2001 - An act defining the crime of money laundering, providing penalties therefore and for other purposes
- **Republic Act No. 10168:** Terrorism Financing Prevention and Suppression Act of 2012 - An act defining the crime of financing of terrorism, providing penalties therefore and for other purposes
- **Public Law 99-570:** The Money Laundering Control Act of 1986 - A United States Act that made money laundering a federal crime
- **The Intelligence Reform and Terrorism Prevention Act of 2004 (IRTPA)** – A United States Act that broadly affects United States federal terrorism laws and seeks to prevent money laundering and financing of terrorism among other things
- **The USA Patriot Act** – A United States Act which establishes the governmental powers for terrorism prevention and authorizes the U.S. State Department to designate terrorist organizations under the Terrorist Exclusion List

### 4.2.3. Anti-trust / Competition act

We do not collaborate with competitors on how to price our services or whether to pursue opportunities in a market. A competitor is:

- Any company that can potentially provide a service, solution or offering that a client might choose over those of Company is a competitor.
- Whether a company is a competitor can change from situation to situation given the nature of our business. We have relationships with companies that are competitors at certain times and business partners, suppliers or even clients at other times.
- When we compete against a business partner, client or supplier on a given opportunity, we need to treat that company as two separate businesses with different relationships—one that competes with us, and one that is a business partner, client or supplier

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We do not misuse the confidential information of our competitors, business partners, clients, suppliers, or former employers.

#### 4.2.3.1. Be fierce but fair with competitors

Company does not engage in conduct that gives even the appearance of unfair competition.

Do not collaborate or agree with a competitor about pricing of services or offerings, or timing of planned price increases or target margin changes. These practices are commonly called bid rigging or price fixing and violate competition laws.

Do not divide opportunities, markets, offerings, or geographic regions. These practices are commonly called market allocation agreements, and they also violate competition laws.

If approached by a competitor about anything prohibited, make it clear that we are not agreeing to anything and do not want their confidential information. End contact with that person immediately and contact Legal as soon as possible.

#### 4.2.3.2. Do not share Company's confidential information with a competitor, and do not accept a competitor's confidential information

While the Company Way is to collaborate and share, we must do so within appropriate limits. Do not share Company's confidential information with a competitor, and do not accept a competitor's confidential information. When joining Company, do not take any documents from former employers or share that employer's confidential information. Do not ask other employees to share confidential information from their former employers.

Confidential information is any information or material not generally available to the public that relates to a company's business, research and development activities, clients or other business partners, customers, or employees—and can include:

- Pricing or target margins
- Customer lists
- Cost of delivery or other costs
- Strategic plans
- Marketing plans
- Contract terms and conditions
- Research and development programs

We respect the obligations new people bring. Respect valid and enforceable obligations that candidates and new employees may have to former employers, such as confidentiality obligations or agreements not to compete or to solicit former clients or colleagues. Expect new Company people to be aware of these obligations and notify their department heads immediately if a job activity may conflict with those obligations.

#### 4.2.3.3. Adhere with anti-trust laws.

Company prohibits unfair competition, and arrangements and combinations that aimed to restrain trade or prevents free competition in the market relating to this law:

- **Republic Act No. 10667:** The Philippine Competition Act - An act intended to ensure efficient and fair market competition among businesses engaged in trade, industry, and all commercial

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economic activities. It prohibits anti-competitive agreements, abuses of dominant positions, and mergers and acquisitions that limit, prevent, and restrict competition.

- The main statutes of the US Anti-Trust Law are the following:
  - **Sherman Act of 1890** - First, Section 1 of the Sherman Act prohibits price-fixing and the operation of cartels, and prohibits other collusive practices that unreasonably restrain trade. While the Third, Section 2 of the Sherman Act prohibits the abuse of monopoly power.
  - **Clayton Act of 1914** - Second, Section 7 of the Clayton Act restricts the mergers and acquisitions of organizations that would likely substantially lessen competition.
  - **Federal Trade Commission Act of 1914** - Provide for both civil and criminal enforcement of antitrust laws.

#### 4.2.4. Data Privacy

**Comply with data protection laws.** We comply with data privacy laws when collecting and processing personal data, including as it relates to our own people and our clients. Data privacy laws also give rights to individuals regarding their personal data.

Data Privacy laws regulate:

- When and how much personal data may be collected.
- How it may be used and when it needs to be deleted or destroyed.
- What notices must be provided.
- When and what type of consents should be obtained.
- When it may be disclosed or shared with third parties.
- Rights of individuals regarding their personal data.

We process personal data fairly and lawfully and provide access to personal data only on a need-to-know basis. When someone provides us with their personal data, we tell them who is collecting/using the data and its intended use or purpose, and we respect their individual rights to their personal data, including right to access, right to be informed, right to object, right to erasure or blocking, right to rectify, right to data portability, right to file a complaint and right to damages.

We do not re-use personal data for other purposes incompatible with the intended use, and we comply with the general data privacy principle of transparency, legitimate purpose, and proportionality. Company maintains retention policies and procedures; when we no longer need to keep personal data, we destroy it or employ encryption techniques such as pseudonymization to render the personal data unreadable. We maintain adequate organizational, physical, and technical security controls for the personal data we manage.

Personal Information and Sensitive Personal Information data that can be linked to an identifiable individual. Examples include:

- Name
- Address

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- Credit card numbers
- E-mail addresses
- Contact details
- Opinions about individuals, their preferences, their voice, and image

Company recognizes that security is important when engaging external service providers to process personal data on our behalf (“Personal Information Processors”). We ensure Personal Information Processors are bound by contractual agreement to process data only as instructed by Company and must maintain appropriate data protection and information security controls as required by applicable data protection laws.

We follow Company’s procedures in dealing with any suspected personal data such as unauthorized access or disclosure or loss of personal data.

## 4.2.5. Government Compliance

**Know how to do business with governments.** We obtain all required approvals to provide services to government clients and comply with government contracting and procurement regulations.

The meaning of “government” is broad. Government clients may include traditional government agencies as well as commercial for-profit entities that are controlled or owned by governments (even partially owned). Doing business with governments is very different from doing business with commercial clients.

Because doing work for government entities often carries legal and other risks, we obtain all required approvals before pursuing opportunities to provide services to government or government-owned clients. We understand and comply with the legal requirements and restrictions that apply to bidding, pricing, and delivering our services to government clients.

## 4.3. DELIVER GREAT CUSTOMER SERVICE

Regardless of your role, we all serve Company’s clients, focusing on the best interests of our clients while acting as ambassadors of Company.

### 4.3.1. Innovation and Focus on Value and Outcomes

**Innovate and collaborate with clients and deliver relevant solutions.** Bring innovation and focus on value and outcomes by collaborating with clients. When we innovate, we seek to understand and collaboratively address ethical and legal considerations that may arise, including those related to new technologies.

We deliver in collaboration with our clients—developing and maintaining relationships which are built on a foundation of integrity, independence, transparency, trust, competence, and proven outcomes. Successful client relationships sometimes require having challenging conversations. Acting in a client’s best interests may require you to reframe the challenge and does not necessarily mean saying yes to anything the client asks for, particularly if it does not deliver value.

We also aim to sustain our clients’ high performance over the long term. We listen and seek to understand our clients’ underlying interests and co-create relevant solutions to meet our

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clients' long-term business objectives (i.e., through changes in business cycles, leadership, and markets).

## 4.3.2. Delivery Excellence

We only commit to what we can deliver, and we follow contractual commitments.

### 4.3.2.1. Commit to what we can deliver

Be aware of the potential limits on the scope of our business and seek appropriate input and approvals before committing to expand into new lines of business or new geographies or implementing new technologies.

When pursuing an opportunity or planning a project, balance collaborative, efficient, and making informed decision among key stakeholders with the accountabilities described in our operating model so that the right person or team makes the ultimate decision.

Proactively identify potential client conflicts of interest and resolve or manage them (with leadership consultation) prior to entering engagements.

For each opportunity, develop a negotiation strategy and engage with our clients as one team, supported by robust internal review and relationship strategies.

Create a thoughtful and robust risk management plans that clearly identify the risks with corresponding mitigating actions and ownership. Also, establish solution based on the risks and the confidence in our risk mitigation and contingency plans.

### 4.3.2.2. Follow contractual commitments

Once we have entered a contract with a client or other party, such as a supplier or business partner, be careful to understand and follow our commitments.

## 4.4. SECURE PEOPLE, INFORMATION AND OUR COMPANY

We work together to build a better, stronger, and more durable company for future generations, protecting the Company brand, meeting our commitments to protect information and intellectual property, acting with an owner's mentality, and protecting and developing our people.

### 4.4.1. Information Security

We protect the confidentiality, integrity, and availability of information of Company, clients and third-party vendors from unauthorized use or disclosure. We follow Company's requirements for protecting and using information, devices and technology belonging to Company, and suppliers

#### 4.4.1.1. Protect confidential information

Confidential information is any information or material not generally available to the public that relates to a company's business, research and development activities, clients or other business partners, customers, or employees. When you receive confidential information from a client or others, make sure you understand our legal, contract and policy obligations and follow them. If you are unsure if the information is confidential, treat it as such.

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## 4.4.1.2. Use confidential information only as permitted

Do not access or handle data or information for which you do not have a business need. Use confidential information only for the purpose provided. Securely dispose of data or information when it is no longer needed, whether it is electronic or in paper form, unless otherwise required by law, contracts, or policies.

## 4.4.1.3. Share confidential information on a need-to-know basis

Share data and information only if there is a valid business requirement to do so and only on a need-to-know basis. Make sure that only authorized people with a current need to know have access to confidential information. Reach out to Department Heads, COMPANY Leaders, Data Privacy or Legal Department to help understand any limitations and answer any questions.

Do not review, discuss, disclose, copy, or use any copyrighted, licensed, or confidential Company, client, supplier, or third-party information except as authorized, and without first making sure we have proper permission.

## 4.4.1.4. Reduce information security risk

We are individually and collectively responsible for reducing our information security risk—which includes protecting devices, as well as data and information. If you do not know whether a particular action presents an information security risk, reach out for guidance before doing it. If you become aware of security weaknesses—whether with respect to individuals, processes, or technology—speak up.

## 4.4.1.5. Protect data and information

Exercise good judgment to maintain and protect the security of data and information entrusted to your care. Be vigilant in protecting devices from loss or theft. Protect our own data and information, and that of our clients, by classifying and marking it properly, and by implementing protective technology and processes (for example, secure your technology devices through security software and configurations that have been approved by Company).

Be cautious about discussing business matters with anyone outside of Company, on the internet or within hearing distance (for example, in elevators) of outsiders, including family and friends.

## 4.4.1.6. Use the solutions, technologies, and services provided by Company to protect data and information

Company use tools to encrypt email and portable media, conduct periodic scans and checks for malware and viruses consistently.

Use Company-provided technology for business purposes only. When using personal workstations or mobile devices for Company business purposes, limit the use to email, Company-provided applications, and browser-based access to Company sites and never store Company or client information on them.

## 4.4.1.7. Take care when using non-COMPANY technology solutions or services

Do not use devices provided by our clients to conduct internal Company business or for personal use. Do not install software or modify configurations that may compromise our technology's security. Do not use third-party web-based services to do Company or client

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work unless these services are approved by Company (and the client) for such use. If third-party web services are authorized, first confirm that we will not be uploading any Company or client data or confidential information. Only use Company-approved solutions to back up data.

#### 4.4.1.8. Report security breaches immediately

Report suspected information security incidents and suspected data privacy breaches to [privacy@convergeict.com](mailto:privacy@convergeict.com) / [cop@convergeict.com](mailto:cop@convergeict.com).

#### 4.4.2. Intellectual Property

We protect and honor the intellectual property rights of others and safeguard Company's intellectual property, including its packaged knowledge.

##### 4.4.2.1. Protect and honor the intellectual property rights of competitors, business partners, clients, suppliers, former employers, and other parties

Honor your commitments to prior employers. Do not allow any employee to use, disclose or bring to Company any electronic or hard-copy documents of a prior employer, or any other party, without explicit written permission, even if the employee created the document, and even if the documents do not contain sensitive or confidential information.

Do not use, distribute, copy, or remove client materials from a client site, without a written agreement reflecting Company's right to do so.

Do not download or use copyrighted materials such as pictures, films, music files, software programs or source code without a proper license. Recognize that the availability of material to view or download on the internet is not an indication that the material can be used without a license.

##### 4.4.2.2. Safeguard Company's intellectual property, including its packaged knowledge

Company's intellectual property helps us outperform our competitors. Our intellectual property is a sales credential that differentiates Company from the rest of the market and highlights to clients the significant investment we have made to create unique value that only Company can offer. Protect, retain, and leverage our ownership in Company's intellectual property rights during negotiations and engagements with clients, suppliers, and other parties.

Mark all COMPANY confidential proposals, documents, and other materials per our guidelines. Share such information only with people who have a need to know and, where appropriate, only after confirming that a non-disclosure agreement and other safeguards are in place.

Understand and comply with any restrictions on packaged knowledge before you use it.

#### 4.4.3. Social Media

**Post constructively to social media sites.** We participate in constructive online dialogues and use our best judgment when posting to external or internal social media.

Contributing to online communities including social networks, blogs, wikis, podcasts, and virtual worlds allows us to demonstrate Company's innovative and collaborative nature and

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is a key element of the Company Way. Online discourse helps us promote our capabilities, build stronger relationships, and enhance our reputation.

When using these sites:

- Communicate thoughtfully and never post content that is disrespectful, harassing, or discriminatory in any message or post that relates to Company, our business, our clients, our business partners, or our people.
- Provide enough context and support in personal online communications to help readers understand your statements.
- Get appropriate approvals before providing an official Company position about a topic related to Company's business—and otherwise do not make statements that could be perceived by others as speaking on behalf of Company.
- Be transparent and identify yourself and your association with Company when commenting on Company matters.
- Protect nonpublic information that relates to Company's business, research and development activities, clients, or other business partners; and protect Company's intellectual property and respect the rights of others.
- Do not identify a company as a Company client unless you have authorization to do so.
- Be mindful of your own privacy and respect the privacy of others.

#### 4.4.4. Brand

**Manage our brand and appropriately coordinate corporate communications.** We centrally manage all media relations and industry analyst activities and events rather than through employees' or engagement teams' own initiatives.

The Company name and brand are powerful and valuable assets that differentiate us from our competitors. Our individual behavior and business decisions—as well as the business decisions we make as a company—advance our brand consistently across the world. All of us have the privilege and responsibility to contribute to the meaning and power of our brand.

To ensure that Company's communications are focused and consistent, and to prevent us from violating the law, all media and industry analyst relations activities should be coordinated through Corporate Communications.

Examples of media and industry analyst relations activities:

- Requests for media interviews.
- Requests for industry analyst briefings.
- What is said and to whom when giving speeches and presentations.
- Participating on panel discussions and at industry and other conferences.
- Making announcements related to business developments.

#### 4.4.5. Asset Protection

**Protect our assets.** We act as owners of the company and do not jeopardize Company's future by losing our assets through theft, misuse, or carelessness.

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We vigorously protect our assets, both physical and intangible. Intangible assets—our brand, reputation, intellectual property, and confidential information—are as worthy of protection as our equipment and computers.

## 4.4.6. Workplace Safety and Business Continuity

**Make personal safety a top priority.** We follow all safety and emergency procedures at our facilities and at client sites, including incident response guidelines and business continuity measures, and we immediately report safety threats, security breaches and disaster/crisis incidents that could affect service delivery.

We make personal safety a top priority. Follow all safety and emergency procedures at our facilities and at client sites.

Immediately report any of the following incidents to the Company Security Department:

- Threats to the life, health, and safety of our people
- Security breaches (including information security)
- Disaster/crisis incidents that could affect the delivery of services to our clients and/or our internal operations

In the case of any such incidents, follow any incident response guidelines and/or business continuity measures.

As Company, we are committed to provide a safe, secure, and non-threatening work environment. Do not bring weapons to Company facilities (except to the extent otherwise permitted by any applicable state, provincial, federal or national laws). This includes public or outdoor venues where a Company-sponsored event or a Company training event occurs, conducting Company business at non-Company locations and attending client or other work-related events.

To protect Company, our people and our assets, Company may ask to search personal property at a company worksite, and to the extent permitted by law, may monitor at any time all Company assets, including e-mail, instant messaging and internet usage.

## 4.5. ADMINISTER OUR COMPANY ETHICALLY AND RESPONSIBLY

We are agile and we strive for high performance — by acting as entrepreneurs and owners of the company. We use sound business judgment to make better decisions and do so within our authority, using informed judgment to take appropriate risks and remaining accountable even where decision making is automated. We recognize the limits to our individual authority. When situations arise that require a more specialized or senior-level review, we are prudent in our decision making and seek counsel. We spend Company's money as if it were our own. We are vigilant and responsible with resources with an eye to the bottom line. We speak up when we see waste of resources.

### 4.5.1. Responsible Use of Data and New Technologies

We use data and new technologies responsibly, including when we deploy artificial intelligence.

#### 4.5.1.1. Use data and new technologies responsibly

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Data is a precious asset and resource for new technologies. Powered by that data, we, in collaboration with our clients and business partners, are better able to develop technologies which change the way the world works impact our lives. At the same time, we are entrusted by our clients and business partners to process their data, including data of their employees and customers. We take our role as guardians of that data very seriously. Provided we first obtain appropriate permissions, we can utilize that data to power advanced analytics and artificial intelligence for Company, our clients and business partners. In addition to complying with applicable data protection laws in protecting personal data from unauthorized use or disclosure. We use such data and related new technologies responsibly and address ethical and legal considerations that may arise.

## 4.5.1.2. Deploy artificial intelligence responsibly

When we deploy artificial intelligence in our organization, we take responsibility for the governance, design, evolution, development, monitoring and performance of those systems. Our approach is to keep a human at the center of the processes associated with those systems. We ensure that we have a governance framework in place which allows for the decisions and actions taken by those systems to be honest and fair. We develop systems that are secure, auditable, transparent, and explainable, and result in outcomes which are consistent with our core values, Code of Business Ethics, and policies.

## 4.5.2. Time & Expense Reporting

We accurately report all hours worked and vacation hours taken. Submit accurate and legitimate business expenses within policy and the appropriate timeframe. Company encouraged trusting employees with their reported hours worked because this can enhance employee engagement, increased productivity, and improve communication.

### 4.5.2.1. Accurately report all hours worked and vacation hours taken

Time and expense reporting have a direct impact on our clients and Company. We each have a responsibility to record all time worked, to the appropriate charge codes, on time and reflecting our work locations. Also, time report reviewers are responsible for checking their reviewees' time and expense entries and raising any concerns if there are inconsistencies.

### 4.5.2.2. Submit accurate and legitimate business expenses within Company policy

Many of our clients have visibility into the expenses charged to their projects. When our spending is appropriate and demonstrates a commitment to adding value, we strengthen client relationships.

Follow Company expense policy and report expenses as they are incurred to enable timely client billing and accurate financial results. Correctly report expenses to be able to claim all applicable expenses and avoid delays in reimbursement.

## 4.5.3. Financial Reporting and Business Records

We prepare and provide accurate, timely and complete financial disclosures and reports. We manage and dispose of business records according to Company's standard timetable for retention, subject to contractual and other legal requirements, such as hold notices issued by Legal Department.

### 4.5.3.1. Accurately disclose financial information

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As a private company, Company must disclose financial and operational information to the local authorities and regulatory bodies as required by law.

Everyone plays a part in accurate disclosure. Company's financial disclosures rely on accurate business records, client invoices, time and expense reports and hours worked. Allow experts such as Investor Relations, Legal, Finance and Corporate Communications to respond to requests for information in their area of expertise to ensure consistent and appropriate communications.

#### **4.5.3.2. Retain business records appropriately**

Identify, manage, and dispose of business records according to Company's standard timetable for retention—and in a manner consistent with the way in which we protect data and information.

The retention periods reflect applicable laws, regulations, and good business practices. Contractual and other legal requirements, such as hold notices issued by Legal, may modify these retention periods. Business records must be retained in Company-approved repository during the retention period.

#### **4.5.4. Travel and Visa & Immigration**

We conduct all business travel in the most cost-effective, safe manner and we get the proper visas or work permits required for international business travel or assignments.

##### **4.5.4.1. Conduct business travel in the most cost-effective, safe manner**

While travel is a necessary part of Company's business, it represents a major company expense and time commitment. We are each responsible for evaluating every trip to ensure the expense is justified, is compliant with Company and local country rules and has the required approvals.

In lieu of travel, consider "virtual" alternatives, such as conference calls, web-conferencing, virtual meetings, and other collaboration technologies wherever possible. In addition to reducing travel costs, the use of virtual alternatives also helps reduce the impact on the environment.

##### **4.5.4.2. Get the proper visas or work permits required for international business travel or assignments**

We are responsible for complying with the immigration laws of the locations that we visit when conducting business. Failure to comply with immigration laws can cause serious consequence that may affect each one of us, Company and its reputation and our clients. When traveling internationally on behalf of Company, obtain all appropriate visas or work permits, required by law, prior to arrival in the country of travel.

#### **4.5.5. Procurement**

We purchase goods and services based on their merits and ensure that supplier's personnel (including contractors) who provide services to Company and our clients follows engagement, compliance and exit requirements and procedures.

##### **4.5.5.1. Purchase goods and services based on their merits**

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We are careful buyers. Company purchases goods and services based on price, quality, performance, and suitability. We do not buy from our clients just because they buy from us. Company has assigned employees to make decisions about purchasing, paying invoices, and signing supplier contracts.

Use standard processes (including review of potential business intermediaries or vendors) that have been put in place by our procurement organization before entering business with any company. When entering a new supplier agreement, reasonably balance value and risk. When deciding to award work to a chosen contractor or vendor, consider the supplier's environmental, ethical and diversity performance. Follow guidelines and obtain approvals for acquiring the services of a former Company Leader for contract services.

Avoid transactions that are questionable, may appear improper, illegitimate or may misrepresent the accounting reports or results of any party to the transaction.

#### **4.5.5.2. Ensure that supplier personnel (including contractors) who provide services to Company and our clients follow engagement, compliance and exit requirements and procedures**

We hold our suppliers to high standards. Our suppliers must act in a manner consistent with Company's Supplier Standards of Conduct, which is built on Company's core values and advocates responsible business practices

#### **4.5.6. Investigations, Litigation and Audits**

We comply and cooperate fully with investigations, litigation, and audits; we let the professionals investigate and work only with authorized personnel; and we identify and preserve relevant information and protect confidential communications.

##### **4.5.6.1. Comply and cooperate fully with investigations, litigation, and audits**

Whenever you are involved in internal or government investigations, ongoing litigation, or audits, cooperate fully with investigative instructions and tell the whole truth.

##### **4.5.6.2. Let the professionals investigate and work only with authorized personnel**

Never initiate an investigation yourself—all requests to conduct internal investigations must be escalated to and authorized by Human Resource Department, Legal Department and Compliance Group. Work only with authorized Legal personnel to respond to litigation or subpoenas (including client requests) or to requests from the government, law enforcement, external auditors, or regulatory agencies.

##### **4.5.6.3. Identify and preserve relevant information and protect confidential communications**

Assist with the identification, collection and preservation of documents, data, and information in connection with investigations, litigation, and audits. Never conceal, change, or destroy documents, data, or information when you know of or anticipate an investigation, litigation, or audit. Keep strictly confidential all information communicated during an investigation, litigation matter, or audit.

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## 4.6. PRACTICE CORPORATE SOCIAL RESPONSIBILITY

We support and respect human rights, foster environmental responsibility, and encourage our people's involvement in the communities where we work and live.

### 4.6.1. Human Rights

We support and respect human rights.

#### 4.6.1.1. Support and respect human rights

We support and respect human rights as expressed in the Philippine Human Rights Law and The Commission on Human Rights (CHR) an independent National Human Rights Institution (NHRI) created under the 1987 Philippine Constitution.

We speak up if we experience any human rights violations and act, or reach out for guidance, if we witness or become aware of any violations.

#### 4.6.1.2. Focus our human rights efforts on areas most relevant to our business and operations in terms of potential human rights impacts

**Diversity and equal opportunity.** We are committed to eliminating discrimination in employment.

**Employment conditions and working practices.** We are committed to:

- Eliminating human trafficking, slavery, servitude, and forced or compulsory labor
- Abolishing child labor
- Ensuring a respectful environment for our people (see Respect for the Individual)
- Respecting the right of our employees to form and to freely join (or not join) legally constituted representative bodies, and working in good faith with them

**Health, safety, and security.** We are committed to ensuring the health, safety, and security of our people.

**Supply chain.** We are committed to supporting and respecting human rights in our supply chain in a manner consistent with Company's Supplier Standards of Conduct.

**Data Privacy:** We protect the privacy and security of personal data and use personal data responsibly and lawfully.

**Anticorruption:** We comply with anticorruption laws.

We continue to review human rights efforts across our operations, as well as best practices in the marketplace, to understand how we can further strengthen our commitment. If it is unclear how to apply the law consistent with our human rights principles, we will seek to use good judgment consistent with our core values and Code of Business Ethics to support and respect the principles of local and internationally recognized human rights.

### 4.6.2. Environmental Responsibility

We foster environmentally sustainable growth for our company and our stakeholders.



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## 4.6.2.1. Foster environmentally sustainable economic growth

We incorporate leading environmental practices into our business strategy and operations. We focus our actions on three areas:

- Running efficient operations
- Enabling client and supplier sustainability
- Engaging our people, leaders, business partners and other stakeholders

## 4.6.2.2. Promote environmental awareness

We encourage and enable environmentally sustainable practices among our employees, clients, suppliers, and the charitable and nonprofit organizations we support. We leverage our people and the digital world to achieve our environmental goals and ensure a better future for our planet. We comply with all applicable environmental laws and regulations.

## 4.6.3. Community Impact

We support our people who choose to volunteer their time and skills to make a measurable difference for individuals, communities, and society.

### 4.6.3.1. Support our people who volunteer their time and skills for the benefit of others

We support employees who donate their time and skills for the benefit of the communities where we work and live. We help our people maximize the impact of their personal contributions by providing convenient channels to offer time, services, and financial assistance to nonprofit organizations.

We do not support organizations that have a policy or practice of discrimination.

### 4.6.3.2. Help address the global need for skills that open doors to employment and economic opportunity

We directly address the global skills shortage by leveraging our core capabilities of training talent and convening partnerships. We mobilize our people, business partners, clients, and others to make a measurable and sustainable difference in the economic vitality and resilience of individuals, families, and communities by equipping people with the skills they need to gain employment.

## 4.7. TEAMWORK AND COLLABORATION

We believe that the interaction of two or more people in Company directed toward a common goal is mutually beneficial to the employee and to our company.

### 4.7.1. Working together

**We are more effective when we are working together.** Company employee's willingness and desire to work effectively with each other to achieve the group's objectives is a key behavior to Company. This company firmly believes that so much more can be achieved when intelligent, talented people work together for a common cause. People who can work well with others also gain energy and passion from interacting with co-workers.

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COMPANY sees the value of working together towards one common goal, along with receiving mutual benefits for the company as well as for the employee. Collaboration provides every team member with equal opportunities to participate and communicate their ideas.

## 4.7.2. Collaboration

We have employees with a wide range of skills, backgrounds, and experiences, often from a variety of disciplines.

This broad diversity in the Company workforce is the reason why teamwork and collaboration can be enormously beneficial for everyone involved—but it's also the reason why working together successfully as one team can be so difficult. To make the most of our team's collective strengths and experience, Company team members and leaders alike shall put forth a concerted effort to get the most out of our teams and avoid destructive, progress-hindering conflict.

Examples of effective methods for improving synergy in teamwork and collaboration include:

- **Improving Communication** – Communication is the bedrock upon which all great teamwork is built.
- **Unlocking Creativity** – No matter how technical our task in Company, there is always room for imagination and innovation. Solving complex problems, meeting new or changing needs of our customers, or using the resources available to us in a smart way all take healthy doses of creativity.
- **Dealing with Change in a Positive Way** – We embrace change and view it in a positive light. This attitude is important for any collaborative effort because we believe that great companies rest on the shoulders of great teams.

## 5. Compliance

Upon approval of the policy, Compliance is tasked to immediately disseminate and to enforce this policy company wide.

**Non-Compliance** - An employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

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