



# ***Sponsorship***

***POLICY AND PROCEDURE***



# Sponsorship Policy and Procedure

Document No.: POL-CGDP-EAC-010

Version. No. 1.1

Governing policy:	<b>Not Applicable</b>
Brief description of policy:	<b><i>This policy and procedure aim to provide guidelines for sponsorships entered into with customers, business partners, and government officials, all while aligning the Company's business objectives with its values.</i></b>
Policy applies to:	<input checked="" type="checkbox"/> <b>Company-wide</b> <input type="checkbox"/> <b>Specific group or employees only</b>
Documented type:	<input type="checkbox"/> <b>New</b> <input checked="" type="checkbox"/> <b>Revision of existing documented information</b>
Policy document status:	<input type="checkbox"/> <b>INITIAL DRAFT</b> <input type="checkbox"/> <b>INITIAL REVIEW</b> <input type="checkbox"/> <b>FINAL REVIEW</b> <input checked="" type="checkbox"/> <b>APPROVED</b>
Quality governance review authority:	<b>Corporate Governance – Regulatory, Ethics, and Governance</b> Corporate Governance and Data Privacy Group
Compliance responsibility owner:	<b>ORIGINAL SIGNED</b> <b>Marylyn Escanlar-Malabanan</b> Head of Regulatory, Ethics, and Governance      Date: _____
Corporate governance officer:	<b>ORIGINAL SIGNED</b> <b>Atty. Laurice P. Esteban-Tuason</b> Senior Vice President & Corporate Compliance and Data Officer      Date: _____
Corporate Communications governance officer:	<b>ORIGINAL SIGNED</b> <b>Juliana R. Encarnado</b> Vice President & Head of Corporate Communications and Public Relations      Date: _____
Finance & Accounting governance officer:	<b>ORIGINAL SIGNED</b> <b>Christine Renee R. Blabagno</b> Senior Vice President & Deputy CFO      Date: _____
Marketing governance officer:	<b>ORIGINAL SIGNED</b> <b>Ma. Lourdes Grace H. Ramirez</b> Vice President & Head of Marketing      Date: _____
Executive Approval Authority:	<b>ORIGINAL SIGNED</b> <b>Maria Grace Y. Uy</b> President      Date: _____
Implementation effectivity date:	<b>November 29, 2024</b>
Approval Date of last revision	<b>September 27, 2022</b>
Effectivity Date of last revision	<b>September 27, 2022</b>
Date of governing policy review*	<b>November 29, 2027</b>

**\*unless otherwise indicated, this policy will still apply beyond the review date**

Related legislation, standards, policies, procedures, guidelines, and local protocols	<b>POL-SARC-QRMS-1009 Anti-Bribery / Anti-Corruption Policy</b> <b>POL-CGDP-BCM-0004 Whistleblowing Policy v2</b> <b>POL-SARC-QRMS-1007 Code of Business Ethics_v2</b> <b>POL-SARC-QRMS-1008 Conflict of Interest Policy</b> <b>POL-SMAT-BPAM-0002 Gift Policy</b> <b>Employee Discipline Policy</b> <b>POL - S&amp;TM - SM&amp;R - 0001 Sustainability Policy</b>
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## Table of Contents

1.	<b>Purpose of this Policy</b>	4
2.	<b>Scope of this Policy</b>	4
3.	<b>Reference</b>	4
4.	<b>Definitions</b>	4
5.	<b>Policy Statement</b>	5
6.	<b>Policy Outline</b>	6
7.	<b>Sponsorship Process Summary</b>	13
8.	<b>Implementation and Communication strategic</b>	16
9.	<b>Non-Compliance and Reporting Process</b>	17
10.	<b>Related document references</b>	18
11.	<b>Details of revision/s made to this policy</b>	18
12.	<b>Annex</b>	19

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# Sponsorship Policy and Procedure

Document No.: POL-CGDP-EAC-010

Version. No. 1.1

Page 4 of 19

## 1. Purpose of this Policy

The purpose of this Sponsorship Policy (the “Policy”) and Procedure (the “Procedure”) is to align the sponsorship activities of Converge Information and Communications Technology Solutions, Inc. (the “Company”) with its mission, vision, values, strategic goals, and sustainability commitments. This Policy and Procedure aims to ensure that sponsorship decisions contribute to the Company’s environmental, social, and governance (ESG) objectives, while maximizing mutual benefits for both the Company and its partners. It will serve as guidance for decision-making, balancing the Company’s business objectives, financial strategies, reputation, and long-term sustainability goals.

## 2. Scope of this Policy

The Sponsorship Policy and Procedure shall apply to all employees of the Company, as well as its subsidiaries, Metworks ICT Construction Inc. and Pentagon Holding Co. Inc., and its affiliates, collectively referred to herein as “Company” who are involved with sponsorships of any kind for the Company. This includes any aspects of both incoming and outgoing sponsorships, including the identification, cultivation, solicitation, and stewardship of prospective or current sponsors.

## 3. Reference

- POL-SARC-QRMS-1009 Anti-Bribery / Anti-Corruption Policy
- POL-CGDP-BCM-0004 Whistleblowing Policy v2
- POL-SARC-QRMS-1007 Code of Business Ethics\_v2
- POL-SARC-QRMS-1008 Conflict of Interest Policy
- POL-SMAT-BPAM-0002 Gift Policy
- Employee Discipline Policy
- POL - S&TM - SM&R - 0001 Sustainability Policy

## 4. Definitions

Term	Definition
Sponsorship	<p>An undertaking requires a formal written agreement or confirmation, where the sponsoring party receives value/benefits, normally in the forms of advertising or promotion, in exchange for cash and/or in-kind considerations given to the sponsored party. These considerations are not considered charitable donations, but rather, business expenses funded from the sponsor’s budget.</p> <p>In cases where corporations are involved to be the sponsoring party, the act shall be referred to as “Corporate Sponsorship”.</p>

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# Sponsorship Policy and Procedure

Document No.: POL-CGDP-EAC-010

Version. No. 1.1

Page 5 of 19

Sponsorship Agreement	Refers to the written document evidencing the mutual agreement of the sponsoring party and the sponsored party. This agreement shall contain the terms of sponsorship, duration, considerations, parties, and other relevant provisions. not otherwise prohibited by any Company policy or by law.
Sponsoring Party	The party is primarily responsible for giving the cash and/or in-kind considerations to the sponsored party. The Sponsoring Party usually receives value by way of promotion or advertisement made by the Sponsored Party.  Sponsoring Parties, at their discretion, are allowed to have their name/ corporate logos included in the materials of the Sponsored Party.
Sponsored Party	The party receiving the cash and/or in-kind considerations given by the Sponsoring Party. The Sponsored Party, in exchange for such considerations, usually promotes or showcases the products/ services of the Sponsoring Company in the form of an advertisement, or in a manner similar thereto.  Sponsored Parties usually reflect the name/ corporate logos of the Sponsoring Party in the materials that they will be using for a specific function/event.
Incoming Sponsorships	Sponsorships that provide cash or financial event sponsorship and in-kind payments for appropriate Company initiatives, events, and activities
Outgoing Sponsorships	Provision of funds, in-kind payments, or endorsements by The Company
Sponsorship Request and Approval Form	The mandatory form to be filled out for sponsorship activities, prior to entering into a Sponsorship Agreement.
Evaluation Team	A designated team from the requesting group who reviews, assess, score documents, and uses an agreed evaluation criterion to select a sponsorship, offers to accept and document this evaluation in the sponsorship monitoring.
Oversight	Oversight or oversee refers to the actions taken to review and monitor an organization's sponsorship policy, programs, and projects, to ensure that they: <ul style="list-style-type: none"> <li>• are achieving expected results.</li> <li>• represent good value for money; and</li> </ul> follow applicable company policies, laws, regulations, and ethical standards.

## 5. Policy Statement

### 5.1. GENERAL PRINCIPLES GOVERNING SPONSORSHIP

The Company shall recognize sponsorship as an effective means to partner with organizations to achieve mutually beneficial outcomes. In view of financial yield strategies, the Company shall provide cash and in-kind payments for appropriate initiatives, events, and activities.

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# Sponsorship Policy and Procedure

Document No.: POL-CGDP-EAC-010

Version. No. 1.1

Page 6 of 19

The Company shall also recognize that certain external sponsorship opportunities (outgoing sponsorships) are avenues for the Company to engage directly with the communities where we operate and to receive positive exposure.

To ensure sponsorship opportunities and initiatives are implemented with mutually beneficial interests in mind, any business unit pursuing either incoming or outgoing sponsorships must be based on the following principles.

- Sponsoring organizations must align with the Company's mission, vision, values, strategic goals, and sustainability commitments.
- Sponsorship deals must always protect the Company's position and reputation.
- Sponsorship opportunities must align with the Company's foundational plans, budget, and department plans, and receive approval from the management.
- Sponsorship of the company will not entitle any sponsor to influence any business decision of the company and there must not be any preferential treatment because of the sponsorship.
- Any individual should not receive any substantial benefit from association with sponsors. Any commissions, substantial gifts, or other financial benefits should be brought to the attention of HR and Compliance.
- Conflict of Interest Declarations shall be accomplished and duly evaluated by the Compliance Team and HR.
- The Company and the company budget may not be used to make contributions to a registered political party, a registered riding or constituency association, or a registered political candidate.
- Finance Department of the company shall maintain the proper books and records of account shall be properly maintained for all financial transactions involving sponsorships. Said books and records shall contain full and accurate entries in compliance with Generally Accepted Accounting Principles (GAAP), and which may be subject to audit.

## 6. Policy Outline

### 6.1. KINDS OF SPONSORSHIPS

The Company acknowledges that sponsorship activities arise from diverse streams of business, ESG, and sustainability related objectives. These sponsorships shall include, but not be limited to the foregoing.

- **Incoming Sponsorships**

Sponsorships that provide cash or financial event sponsorship and in-kind payments for appropriate Company initiatives, events, and activities. Normally, in this case, the Company acts as the sponsored party.

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- **Outgoing Sponsorships**

Provision of funds, in-kind payments, or endorsements by The Company as a sponsoring party.

- **Corporate Sponsorships**

A form of marketing in which a company pays for the right to be associated with a project or program. A common template for corporate sponsorships entails a collaboration between a nonprofit organization and a sponsor corporation, in which the latter funds a project or program managed by the former in exchange for recognition.

Corporations may have their logos and brand names displayed alongside of the organization undertaking the project or program, with specific mention that the corporation has provided funding.

## 6.2. TYPES OF EVENT SPONSORSHIPS

The Company acknowledges that sponsorship activities arise from diverse streams of business, ESG, and sustainability-related objectives. These sponsorships shall include, but not be limited to the foregoing.

- **Financial Event Sponsorships**

A sponsorship that offers monetary considerations to an event organizer in exchange for promotions or other benefits outlined in the sponsorship agreement.

- **In-Kind Sponsorships**

In-kind sponsorship provides goods, services, or intangible considerations instead of monetary considerations. Some examples of it are the following:

- Venue Partner
- Prize Sponsor
- Food Sponsor
- Digital Sponsor

- **Media Event Sponsorships**

Sponsorship activity is initiated either by the Company or an external party that primarily holds functions through social media platforms and other analogous avenues of media.

- **Promotional Partners Sponsorships**

The Promotional Partners Sponsorship activity can be initiated by the Company through a promotional partner. The promotional partners are individual people who have a large following on social media. They can promote our organization's event to their individual fan base.

- **Government Sponsorships**

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# Sponsorship Policy and Procedure

Document No.: POL-CGDP-EAC-010

Version. No. 1.1

Page 8 of 19

Government sponsorship is an outgoing sponsorship wherein our Company act as a sponsoring party to any government agencies or local government units in a form of in-kind payments. E.g., **Complimentary Internet Connectivity Sponsorships** to serve the public.

### 6.3. SPONSORSHIP EVALUATION CRITERIA

In all instances where an offer of sponsorship is made to the Company by more than one organization, all sponsorship offers should be evaluated through a fair and equal process that ensures that the sponsorship chosen offers the best value while aligning with the Company's sustainability commitment. The recommended criteria for evaluating sponsorship offers are outlined below. The officer managing the sponsorship should form an Evaluation Team, consisting of at least one other key member of staff relevant to the event. The Team should use an agreed evaluation criterion to select a sponsorship offer to accept and document this evaluation in the sponsorship monitoring.

TABLE NO. 1

CRITERIA	SCORE TO BE AWARDED (OUT OF 100%)
<u>Financial value to Company (Value Score)</u> It increases visibility for our company brand. It allows us to aim for a specific demographic of sales and improves our company's reputation for success and refinement.	up to 70%
<u>Alignment with Corporate Objectives (Fit Score)</u> Preferred sponsors would align with the Company's Objectives and best practices	up to 15%
<u>Alignment with Sustainability Commitment (Sustainability Score)</u> Preferred sponsors either demonstrate or outline plans for sustainable practices that align with the Company's ESG goals and contribute to addressing the country's economic, environmental, and social challenges.	up to 10%
<u>Appropriateness of Sponsor to event (Appropriateness Score)</u> This should judge how well the nature of the sponsor fits with the event and should consider their profile, relevance, and credibility	up to 5%

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# Sponsorship Policy and Procedure

Document No.: POL-CGDP-EAC-010

Version. No. 1.1

Page 9 of 19

TABLE NO. 2 - For the Sponsorship with more than one organization

NAME OF SPONSOR	DETAIL OF OFFER	
Sponsor 1	Amount to be paid	
	Value Score	Comments
	Corporate Fit Score	Comments
	Sustainability Score	Comments
	Appropriateness Score	Comments
Total Score		
Sponsor 2	Amount to be paid	
	Value Score	Comments
	Corporate Fit Score	Comments
	Sustainability Score	Comments
	Appropriateness Score	Comments
Total Score		

## 6.4. ROLES AND RESPONSIBILITIES

### 6.4.1. Sponsorship Transaction Proponents/Stakeholders

Benefits received by either sponsoring or sponsored parties must observe the Company promotion agreements and advertising policies. The agreements with other partners, organizations, and sponsors must abide by all applicable Company policies and undergo the appropriate approval procedures. Since sponsorship is not a donation, it is the responsibility of each proponent to:

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# Sponsorship Policy and Procedure

Document No.: POL-CGDP-EAC-010

Version. No. 1.1 Page 10 of 19

- Function as primary oversight for handling the sponsorship program, verifying, and monitoring. The oversight responsibilities of each proponent include as in charge of oversight functions particularly looking at a process, program, or project from above, but not getting involved in its day-to-day management and approval.
- Ensure that sponsorship agreements entered by the Company are consistent with the general sponsorship principles reflected in this policy and procedure, as well as existing laws and regulations that apply thereto.
- Oversee securing partners for sponsorship opportunities at the company to ensure consistent valuations and a coordinated approach. Individual departments may work to secure and manage relationships with sponsoring organizations, with the approval of their business unit head.
- Oversee the company-funded sponsorship opportunities with external organizations to ensure a coordinated approach. Individual company departments may sponsor external events and initiatives directly, with the approval of their group head, in consultation with each proponent.

## 6.4.2. Finance and Accounting

- Finance and Accounting shall ensure all the Sponsorship expenses shall be properly recorded and maintained in the Company's books and records and substantiated with proper receipts.
- Finance and Accounting department ensures fulfillment of financial obligations upon proponent's approved request for payment and make sure costs of sponsorship are within the approved budget.
- All Sponsorship transactions shall be properly recorded and maintained in the Company's Books and Records at the same time comply with Philippine Financial Reporting Standards (PFRS) and use Generally Accepted Accounting Principles (GAAP) issued by the Accounting Standards Council (ASC) when preparing financial statements and in which may be subject to audit;

## 6.4.3. Company Corporate Communications and Public Relations (CCPR) and Marketing

Sponsorship is one of the key marketing and corporate communication strategies. Our company through Company Corporate Communications and Public Relations (CCPR) and Marketing shall allocate budget figures for sponsorships as part of the investment that deals with a wide range of audience reach.

In all its forms, Marketing and CCPR will ensure sponsorships that will allow our company to reach targeted niche markets and through strategic sponsorship, help our business meet marketing and corporate goals including but not limited to:

- Sponsoring events that create positive feelings about our brand and shape consumer attitudes.
- Build brand awareness by choosing an event carefully, that guarantees to expose our products/services to our targeted customers.
- Sponsorship opportunities that drive sales and brand awareness at the same time.

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# Sponsorship Policy and Procedure

Document No.: POL-CGDP-EAC-010

Version. No. 1.1 Page 11 of 19

- Strategic sponsorship that encourages word-of-mouth marketing and increases brand reach.
- Sponsor events that increase positive media exposure/publicity and generate visibility of our products and services to a large market.
- Differentiate our brand from competitors by sponsoring an event, that sets our Company apart from our competitors.
- Sponsoring events that are more likely to perceive our Company contributing goodwill to a community, which creates a positive association with our brand.
- Sponsoring an industry event, that can connect with consumers who are actively in need of our services and generate new leads.
- Sponsoring an event that will enhance business, consumer, and VIP relationships.

## 6.4.4. Sales and Government Relations

To ensure compliance with relevant laws and regulations prior to engaging with government sponsorship on the requirements of the government agencies participating in receiving or providing sponsorship, unless otherwise exempted.

## 6.5. SPONSORSHIP PARTNER

The Company shall only enter into sponsorship agreements with the following entities:

- Sponsorship should be avoided with any business or organization that has a real or perceived conflict of interest, or that does not adhere to the Company policies and Consumer Rights Law.
- Sponsorship arrangements will only be with entities that uphold good governance and transact business in an ethical manner.

## 6.6. SPONSORSHIP THRESHOLD

The standard monetary threshold for sponsorship to be given to private organizations and government officials to be implemented upon full approval of this policy and procedure.

- Meal Limits for Government Officials - If permitted by Philippine Laws. Converge ICT may provide a modest meal during sponsorship events. However, the amount of meal shall not exceed P1,500.00 per head (maximum).
- Meal Limits for Private Organization
  - Breakfast - P1,500.00/head
  - Lunch - P2,000.00/head
  - Dinner - P2,500.00/head
  - Snack - P800.00/head (AM/PM)

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# Sponsorship Policy and Procedure

Document No.: POL-CGDP-EAC-010

Version. No. 1.1 Page 12 of 19

- Travel for Government Officials and Private Organization: **Economy**

**Note:** We urge strict compliance with the Sponsorship Threshold to both Private Organization and Government Officials. Should the meal costs and travel expenses for a sponsorship activity exceed the

prescribed threshold, the Evaluation Team shall be primarily responsible for ensuring that the MFAI reflects the reason for such excess, prior to management approval.

## 6.7. SPONSORSHIP AGREEMENT

To ensure transparency and clarity, a sponsorship agreement shall include but not limited to the following outlines:

- The Sponsorship agreement shall contain legal details between a sponsor and those who must enforce the sponsorship obligation, including fees for the service to be cleared and approved by the Legal Services Group.
- The Sponsorship agreement must reflect the terms of sponsorship, duration of the sponsorship, considerations involved, responsibilities of the parties, and any other relevant provision not otherwise prohibited by any Company policy or law.
- The Sponsorship Agreements must redound to the mutual benefit and interest of the parties concerned. Such agreements must be consistent with the Company policies, all applicable laws and regulations, and the provisions set forth in this policy and procedure.
- The Sponsorship Agreement must clearly indicate the business purpose of such sponsorship. The corresponding values to be received and expenses to be incurred must likewise be reflected, in as far as the same can be accurately accounted for.
- Similarly, a duly filled out Sponsorship Request and Approval Form must first be cleared and approved by the requesting group head, prior to entering into a Sponsorship Agreement.

## 6.8. SPONSORSHIP GUIDELINES

To ensure transparency and clarity, a sponsorship agreement shall include but not limited to the following outlines:

For the purposes of these guidelines the following are not considered to be sponsorship activities:

- Grants or funding, which are monies or goods provided to a recipient through a formally recognized program for a specified purpose. A grant is normally understood as a form of financial assistance that assists an individual or organization to develop a specific project, with no expectation of a commercial return or benefits.
- Stand-alone advertising contracts.
- Joint ventures, consultancies, or partnerships in which the organizations share ownership and responsibility for the ultimate outcome.

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# Sponsorship Policy and Procedure

- Projects such as displays and exhibitions in which the sponsor does not receive genuine and measurable value for money.
- Gifts, donations, bequests, endowments, and prizes and
- Scholarships and research projects except where it could relate to or influence public policy. Common purposes for grants are:
- Advancement in the quality of life of citizens - this may be achieved by providing funding for the environment, recreation opportunities, the arts and education 5
- Reduction in public expenditure - this may be achieved by providing grants for research into cures for disease, road safety, community self-help groups, and crime reduction
- Increasing economic outcomes for citizens - this may be achieved by providing grants for job creation, training, technology development and small business development. Grants are the subject of a more complex process that includes formal requirements, evaluation of the submissions, and assessment of the outcomes against the organizational objective.

## 6.9. DEFINITION OF SPONSORSHIP, DONATION, OR GRANT

**SPONSORSHIP** is usually the paying of money by a business to the Sponsored Party to secure the marketing and promotion of its business name, products, services, or image. Sponsorship may also include the giving of services or goods for the same in return. The benefit sought for the sponsorship will be viewed as good value for the level of sponsorship given and may include a profile on publicity, displays, branding at events, hospitality, access to a target market or photo opportunities. Sponsorship should always be documented by a written agreement issued by the Sponsored Party. Sponsorship is subject to VAT.

**DONATION** is a gift for which no direct benefit is sought. A donation may take various forms including cash, services, or goods. A donor's name or list of donors may be on display or included in publicity if the Sponsored Party chooses to do so by way of thanks. It must be made clear to the donor that any decision to display or include the donor's name is at the sole discretion of the Sponsored Party. Donations are not subject to VAT. Donations may or may not be subject to donors' taxes and would be best to consult the Tax Planning and Compliance Team for the implications.

**GRANT** is cash given to an individual or an organization for a specific purpose. There is an obligation to fulfill any criteria the funding body may place upon the grant i.e., to ensure the project that is funded satisfies their aims and objectives and proceeds as outlined during the grant application process. Funding bodies usually require some level of profile in return for their grant and this should be in proportion to the size of grant and agreed in writing before accepting the grant. This is usually in the form of a logo or line credit with agreed wording in publicity. Grants should always be documented in a written agreement between the parties. Grants are not subject to VAT unless you are providing goods or services in return.

## 7. Sponsorship Process Summary

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# Sponsorship Policy and Procedure

Document No.: POL-CGDP-EAC-010

Version. No. 1.1 Page 14 of 19

## 7.1. DEVELOPING A SPONSORSHIP PROGRAM/REQUEST

If the Company intend to enter sponsorship arrangements should identify and prioritize specific projects suitable for sponsorship. Each requester will file and review a significant value of Php10,000 or greater sponsorship opportunities with the approval of executive management.

## 7.2. IDENTIFYING BENEFITS OF SPONSORSHIP OPPORTUNITIES

Measurable marketing, corporate and sustainability objectives and targets should be set for all sponsorships. The targets should be part of the approval process, ensuring alignment with the organization's sustainability goals. Performance should be regularly measured against the agreed-upon targets to assess both the marketing impact and contributions to sustainability initiatives.

## 7.3. RISK MANAGEMENT

Risk identification and management plan should be developed for sponsorship arrangements that are considered sensitive, high value, or complex. Risk is defined as the chance of something happening that will have an adverse impact on objectives. It is measured in terms of the likelihood of happening and its consequences. Risks can be financial or non-financial and may, if poorly managed result in a Company suffering a loss of corporate information, skills, intellectual property, control, or security. Effective risk management can reduce overall costs and uncertainty and improve the management of the sponsorship arrangements.

## 7.4. Preparation of Sponsorship Agreement

A sponsorship agreement should only be considered when the intention is to provide the best value for money and a 'win-win' result for our Company. Value for money is not necessarily always related to direct profit and/or savings. Increasing the Company's profile and growing the audience for a message or vision is also value for money (please see Annex C for the copy of the Sponsorship Agreement template).

## 7.5. Monitoring and Reporting

The sponsorship reporting and monitoring shall be done consistently by the requestor to monitor their own Sponsorship documentation.

For a clear view of the flowchart - **please see Annex B.**

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# Sponsorship Policy and Procedure

Document No.: POL-CGDP-EAC-010

Version. No. 1.1 Page 15 of 19

## Sponsorship Procedure

Marilyn Malabanan | November 18, 2022



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# Sponsorship Policy and Procedure

Document No.: POL-CGDP-EAC-010

Version. No. 1.1 Page 16 of 19

## 8. Implementation and Communication strategic

### 8.1. Final Outputs / Expected Deliverables (RACI Matrix)

Final outputs/ Expected Deliverables	Responsible	Accountable	Consulted	Informed
Marketing Initiated Sponsorship	Marketing	Marketing	CCO / Executive Management	CCO / Executive Management Finance and Accounting
Corporate Communications and Public Relations Initiated Sponsorship	Corporate Communications and Public Relations	Corporate Communications and Public Relations	Executive Management	Executive Management Finance and Accounting
Sales Initiated Sponsorship	Sales	Sales	CCO / Executive Management	CCO / Executive Management Finance and Accounting
Government Affairs Initiated Sponsorship	Government Affairs	Government Affairs	Government Relations Affairs	Government Relations Affairs and Finance and Accounting
Preparation of Sponsorship Agreement	Per Initiative – Marketing, CCPR, Sales and Government Affairs	Per Initiative – Marketing, CCPR, Sales and Government Affairs	CCO, Executive Management, and Government Relations Affairs	CCO, Executive Management, and Government Relations Affairs and Finance and Accounting
Completion of Sponsorship Evaluation Criteria by more than one organization	Per Initiative – Marketing, CCPR, Sales, and Government Affairs	The Group that initiated the request	CCO, Executive Management, and Government Relations Affairs	CCO, Executive Management, and Government Relations Affairs, and Finance and Accounting
Monitoring and Reporting	Sponsorship Proponents/Stakeholders	Sponsorship Proponents/Stakeholders	Executive Management	Executive Management Finance and Accounting

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## Sponsorship Policy and Procedure

Document No.: POL-CGDP-EAC-010

Version. No. 1.1 Page 17 of 19

### 9. Non-Compliance and Reporting Process

Upon approval of the Sponsorship Policy and Procedure, The Compliance Team is tasked to immediately disseminate and enforce this policy and procedure company wide.

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

OFFENSE/S	PENALTIES					
	1st	2nd	3rd	4th	5th	6th
Non-compliance with these Policy and Procedure	Verbal warning	Formal explanation to the Department Head, Compliance Team, and HR with a warning to comply	Formal explanation with warning of 3 days suspension	5 days suspension	Warning of Dismissal with minimum 10 days suspension	Dismissal
Failure to accomplish Fully Approved Sponsorship Form	Verbal warning	Formal explanation to the Department Head, Compliance Team, and HR with a warning to comply	Formal explanation with warning of 3 days suspension	5 days suspension	Warning of Dismissal with minimum 10 days suspension	Dismissal
Habitual disregard of Compliance Initiatives	Formal explanation to the Department Head, Compliance Team, and HR with warning of suspension	Formal explanation with 3 days suspension	5 days suspension with Warning of Dismissal	Dismissal or 10 days suspension		

**Note:** Offenders of this policy and procedure will, by default, incur the offense of non-compliance with this Policy and Procedure. The Company reserves the right to assess the situation and can impose heavier disciplinary actions, depending on the severity and gravity of the offense committed.

**Whistleblowing Provision:** Any employee, with knowledge of, or has observed, actual, or threatened violations of this Policy and Procedure, may choose to file a report to the Converge Whistleblowing Platform with the link: <https://corporate.convergeict.com/whistleblowing-platform>.

**Anti-Bribery/Anti-Corruption Provision:** This Sponsorship policy is governed by the laws relating to Anti-Bribery and Anti-Corruption, including but not limited to:

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# Sponsorship Policy and Procedure

Document No.: POL-CGDP-EAC-010

Version. No. 1.1 Page 18 of 19

- a) The Foreign Corrupt Practices Act (“FCPA”).
- b) The Organization for Economic Cooperation and Development’s Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (“OECD Convention”); and
- c) 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.
- d) Presidential Decree No. 807, Civil Service Decree of the Philippines - 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.
- e) Republic Act No. 6713, Code of Conduct and Ethical Standards for Public Officials and Employees – Prohibits any public official or employee from soliciting or accepting, directly or indirectly, any form of gift, favors, gratuity, favors, entertainment, loan or anything of monetary value from any person
- f) Republic Act No. 3019, Anti-Graft and Corrupt Practices Act – Enumerates certain acts of public officers that constitute corrupt or graft practices
- g) Republic Act No. 9485, Anti-Red Tape Act – Improves efficiency in the delivery of government service to the public by reducing bureaucratic red tape, preventing graft and corruption, and providing penalties.
- h) Act No. 3815, The Revised Penal Code of the Philippines

All employees will not at any time offer, promise, give, or receive any improper financial payment and/or other improper advantages to or from any person, customer, or supplier (whether a public official or otherwise) with the intention of influencing them and obtaining or retaining an advantage in the conduct of the business of the Company.

## 10. Related document references

Please refer to the above references.

## 11. Details of revision/s made to this policy

From time to time the company may make changes to this Policy and relevant Guidelines to improve the effectiveness of its operation.

Version No.	Date	Description of Change	Author	Approver
1.0	September 27, 2022	Initial Document	Marlyn Escanlar - Malabanan	Atty. Laurice P. Esteban-Tuason
1.1	November 29, 2024	<ul style="list-style-type: none"> <li>• Added Sustainability Criteria for sponsorship</li> <li>• Change Template</li> </ul>	Dessa Bahia John Michael Avila Jeffrey Camaya	Atty. Laurice P. Esteban-Tuason

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## 12. Annex

A. **Sponsorship Request and Approval Form** – This form is to be used by groups who would want to have a sponsor for an event. In the form, there are three sections to be filled out by the requestor and one additional section to be completed by the sponsoring organization. The first section is allotted for documenting the information of the requestor. The second section, on the other hand, is for stating the details of the sponsorship and the event to be conducted, while the third section contains the approval of Corporate Communications and Public Relations.

B. **Sponsorship Process Flow Chart**



Sponsorship  
Procedure (7).pdf



Sponsorship Request

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