



# ***Sustainability***

## ***POLICY***

**PUBLIC**

*This document has been classified for public use.*



## Table of Contents

<b>1. Purpose of the Policy</b>	<b>4</b>
<b>2. Scope of the Policy</b>	<b>4</b>
<b>3. Definition of Sustainability</b>	<b>4</b>
<b>4. Sustainability Philosophy</b>	<b>4</b>
4.1 Vision, Mission, Values & Sustainability Commitment	5
4.2 Sustainability Pillars & Principles	5
4.3 Stakeholder Engagement	6
4.4 Materiality Assessment	8
<b>5. Sustainability Governance</b>	<b>9</b>
5.1 Sustainability Governance Structure	10
5.2 Roles and Responsibilities of the Key Parties	10
<b>6. Sustainability Approach</b>	<b>11</b>
6.1 Pillar 1: Delighting Customers by Taking Care of Our Own (Social & Economic)	12
6.2 Pillar 2: Operating a Responsible Company and Leading with Integrity and Good Governance (Social, Economic & Governance)	13
6.3 Pillar 3: Giving Back to Our Planet (Environment)	13
6.4 Pillar 4: Creating Positive Community Impact (Social & Environment)	13
<b>7. Sustainability Budget</b>	<b>14</b>
<b>8. Review of Sustainability Performance</b>	<b>14</b>
8.1 Performance Measurement	14
8.2 Reporting & Disclosure	15
8.3 External Assurance	15
<b>9. Policy Amendment</b>	<b>15</b>
9.1 Version Control	15
<b>10. Publication of Policy</b>	<b>17</b>
<b>11. Related Policy References</b>	<b>17</b>

## 1. Purpose of the Policy

In our pursuit to become a World Class ICT organization, providing accessible and reliable internet connection solutions, Converge Information and Communications Technology Solutions Inc., (“CICT”, the “Company” or “we”) takes every effort to integrate sustainability in our business operations. This Sustainability Policy (“Policy”) communicates our sustainability philosophy, commitment, principles, pillars and approach with our internal and external stakeholders. It serves as a guide for decision making and management across the organization.

## 2. Scope of the Policy

This Policy shall apply to all employees of Converge and its subsidiaries and affiliates, who are required to adhere to the policy statements in this document.

In addition, relevant stakeholders such as but not limited to: suppliers, vendors, business partners, including joint ventures, as well as all agents, consultants, and third-party representatives when they act on behalf of CICT, are expected to embody the principles enshrined in our policy statements.

## 3. Definition of Sustainability

CICT has adopted AA1000 AccountAbility Principles’ definition of Sustainability, which is “the responsible management of social, environmental, economic and governance impact for improved long-term organizational performance and societal development.” This includes the management of impacts on internationally recognized human rights. The objective of running CICT as a sustainable business is to meet “the present needs without sacrificing the next generations’ abilities to satisfy their own needs” (United Nations Brundtland Commission, 1987).

## 4. Sustainability Philosophy

To prosper over time and be relevant to the needs of the communities we operate in, we must go beyond legal compliance and care not only about our financial performance but also our economic, environmental and social impacts, including human rights impacts. Further, our efforts should be aligned with global and national goals of sustainable development. This means:

- aligning with national policies, programs and goals, including but limited to AmBisyon Natin 2040, the Philippine Development Plan currently in force, the National Broadband Plan, and the country’s Nationally Determined Contribution to the Paris Agreement;
- considering universal targets of sustainability, such as the United Nations Sustainable Development Goals (UN SDGs), the Broadband Commission’s 2025 Broadband Advocacy Targets, and the UN’s aspirational targets for achieving universal and meaningful digital connectivity by 2030;

- responding to expectations of responsible business conduct set out in authoritative intergovernmental instruments, including the UN Guiding Principles on Business and Human Rights (UNGP);
- recognizing the UNGP, PNS ISO 26000:2010 guidance, and the OECD Due Diligence Guidance for Responsible Business Conduct on conducting due diligence to identify, prevent, mitigate, and account for how the CICT addresses its actual and potential negative impacts;
- supporting and implementing the Ten Principles of the United Nations Global Compact (UNGC) on human rights, labor, environment and anti-corruption.

## 4.1 Vision, Mission, Values & Sustainability Commitment

Our Vision is to become a world-class Information and Communications Technology (ICT) organization that empowers people, businesses, and the nation to be their best. To actualize this, we have a Mission to delight customers by taking care of our own. The values of Integrity, Customer Focus, Teamwork, Empowerment, Excellence and Velocity are embedded in our business operations and the behaviors of employees.

We desire to make sustainability part of our strategy, culture and day-to-day operations. Thus, we have set the following Sustainability Commitment:

*“We empower the Filipino people and the nation through technology while respecting humanity and the environment as we create a prosperous and sustainable future for all.”*

## 4.2 Sustainability Pillars & Principles

Our Sustainability Commitment stands on the following four pillars which are anchored on our Mission and Vision.

1. Delighting our customers by taking care of our own;
2. Operating a responsible company and leading with integrity and good governance;
3. Giving back to the planet; and
4. Creating positive community impact.

The foundation of the above four pillars is grounded in the following principles:

- Upholding integrity and good governance
- Caring for our people
- Building trust with our customers
- Pursuing greener operations
- Driving a sustainable supply chain
- Empowering our communities

Based on this framework, CICT commits to developing and implementing a Sustainability Strategy and Plan, to be updated annually. The plan is intended to be a living document setting out our agenda for managing our economic, environmental, and social impacts.

### 4.3 Stakeholder Engagement

We adopt AA1000AP’s definition of stakeholders: “groups who affect and/or could be affected by an organization’s activities, products or services and associated performance.” Engaging stakeholders is a crucial part of the sustainability journey. We value what our stakeholders are concerned about and what they expect us to do to build a sustainable world together. Thus, on December 13, 2022, the Board of Directors approved [CICT’s Corporate Stakeholder Commitment Statement](#).

We recognize that meaningful stakeholder engagement is a key component of the due diligence process, as it helps identify stakeholder interests that are or could be affected by CICT’s activities. Engaging with stakeholders, their representatives or their proxy organizations, helps ensure that we adhere to the principle of **Inclusivity** in the AA1000AP framework, and enables us to continuously improve in our sustainability journey.

We follow the guidance provided by the AA1000 Stakeholder Engagement Standard 2015 (AP1000SES). Methods and responsible functions for stakeholder engagement are set out in the table below.

Stakeholder Group	Engagement Method & Frequency	Responsible Functions
<b>Board and Management</b>	<ul style="list-style-type: none"> <li>Weekly business operations and project portfolio meetings</li> <li>Monthly and quarterly business reviews</li> <li>Board meetings <b>(Q)</b></li> <li>Materiality Assessment Workshop/Survey <b>(A)</b></li> <li>Sustainability Report <b>(A)</b></li> </ul>	<ul style="list-style-type: none"> <li>Corporate Secretary</li> <li>Corporate Governance</li> <li>Sustainability Core Team</li> <li>Sustainability Council</li> </ul>
<b>Employees</b>	<ul style="list-style-type: none"> <li>Business Kickoff <b>(A)</b></li> <li>Sustainability briefing to BU Partners <b>(AR)</b></li> <li>Email blasts, announcements, and memos <b>(AR)</b></li> <li>Town hall <b>(A)</b></li> <li>HR Helpdesk <b>(AR)</b></li> <li>Labor relations <b>(AR)</b></li> <li>Training courses <b>(AR)</b></li> <li>Materiality Assessment Workshop/Survey <b>(A)</b></li> <li>Sustainability Report <b>(A)</b></li> <li>Employee Engagement Survey <b>(A)</b></li> </ul>	<ul style="list-style-type: none"> <li>Employee and Labor Relations</li> <li>Corporate Communications and Public Relations</li> </ul>
<b>Investing Community</b>	<ul style="list-style-type: none"> <li>ESG Investor Day <b>(A)</b></li> <li>Sustainability Report <b>(A)</b></li> <li>Annual Report <b>(A)</b></li> <li>Integrated Annual Corporate Governance Report (IACGR) <b>(A)</b></li> <li>Investor and Analyst briefings</li> <li>Regulatory disclosures (SEC, PSE) <b>(AR)</b></li> <li>Dialogue, feedback, consultation and clarifications <b>(AR)</b></li> <li>Investor Relations contact – email address and phone number listed on website</li> <li>Materiality Assessment Workshop/Survey <b>(A)</b></li> </ul>	<ul style="list-style-type: none"> <li>Investor Relations</li> <li>Corporate Governance</li> </ul>

Stakeholder Group	Engagement Method & Frequency	Responsible Functions
<b>Creditors</b>	<ul style="list-style-type: none"> <li>• Sustainability Report (A)</li> <li>• Annual Report (A)</li> <li>• Integrated Annual Corporate Governance Report (IACGR) (A)</li> <li>• Regulatory disclosures (SEC, PDEX) (AR)</li> <li>• Materiality Assessment Workshop/Survey (A)</li> <li>• Company-initiated meetings (AR)</li> <li>• Email (AR)</li> </ul>	<ul style="list-style-type: none"> <li>• Treasury</li> <li>• Corporate Governance</li> </ul>
<b>Government and Regulators</b>	<ul style="list-style-type: none"> <li>• Regulatory reports and disclosures (AR)</li> <li>• Meetings (AR)</li> <li>• Official correspondence (AR)</li> <li>• Materiality Assessment Workshop/Survey (A)</li> <li>• Sustainability Report (A)</li> </ul>	<ul style="list-style-type: none"> <li>• Government Relations</li> <li>• Legal</li> </ul>
<b>Customers</b>	<ul style="list-style-type: none"> <li>• Sustainability Report (A)</li> <li>• Company-initiated meetings (AR)</li> <li>• Customer Hotline (AR)</li> <li>• Email (AR)</li> <li>• Social media interactions and social listening (AR)</li> <li>• Marketing activities such as promos (AR)</li> <li>• Customer visits for top priority enterprise customers (AR)</li> <li>• Materiality Assessment Workshop/Survey (A)</li> </ul>	<ul style="list-style-type: none"> <li>• Customer Experience</li> <li>• Marketing</li> <li>• Regional General Managers</li> <li>• Data Protection Officer</li> </ul>
<b>Suppliers and Vendors</b>	<ul style="list-style-type: none"> <li>• Sustainability Report (A)</li> <li>• Company-initiated meetings (AR)</li> <li>• Third Party Code of Conduct</li> <li>• Emails (R)</li> <li>• Materiality Assessment Workshop/Survey (A)</li> </ul>	<ul style="list-style-type: none"> <li>• Supply Chain Management</li> </ul>
<b>Business Partners</b>	<ul style="list-style-type: none"> <li>• Third Party Code of Conduct</li> <li>• Training (AR)</li> <li>• Monthly and quarterly business reviews</li> <li>• Company-initiated meetings and seminars (AR)</li> <li>• Emails (R)</li> <li>• Sustainability Report (A)</li> <li>• Materiality Assessment Workshop/Survey (A)</li> </ul>	<ul style="list-style-type: none"> <li>• Regional General Managers</li> <li>• Supply Chain Management</li> </ul>
<b>Communities</b>	<ul style="list-style-type: none"> <li>• Discussions/dialogues with partner organization (AR)</li> <li>• Announcements on website</li> <li>• Press conferences and press releases</li> <li>• Community outreach programs</li> <li>• Corporate sponsorships (ongoing)</li> <li>• Sustainability Report (A)</li> <li>• Materiality Assessment Workshop/Survey (A)</li> </ul>	<ul style="list-style-type: none"> <li>• Community Relations</li> <li>• Regional General Managers</li> </ul>
<b>NGOs and Advocacy Groups</b>	<ul style="list-style-type: none"> <li>• Company-initiated meetings (AR)</li> <li>• Materiality Assessment Workshop/Survey (A)</li> </ul>	<ul style="list-style-type: none"> <li>• Strategy and Transformation Management</li> <li>• Community Relations</li> </ul>
<b>Workers / employees of our business partners, suppliers and vendors</b>	<ul style="list-style-type: none"> <li>• Materiality Assessment Workshop/Survey (A)</li> <li>• Sustainability Report (A)</li> <li>• Email blasts, announcements, and memos (AR)</li> <li>• Training courses (AR)</li> </ul>	<ul style="list-style-type: none"> <li>• Supply Chain Management</li> <li>• Human Resource</li> <li>• Emerging Channels</li> <li>• Metworks</li> <li>• Workplace Premises and Fleet Management Group</li> </ul>

Stakeholder Group	Engagement Method & Frequency	Responsible Functions
Media	<ul style="list-style-type: none"> <li>• Materiality Assessment Workshop/Survey (A)</li> <li>• Sustainability Report (A)</li> <li>• Financial and Operations Results Briefing (Q)</li> <li>• Annual Stockholders Meeting (A)</li> <li>• Media Briefings on Corporate Updates, Product Launches, Seasonal Events, Sustainability Campaigns, among others (AR)</li> <li>• Converge Speaking Engagements</li> </ul>	<ul style="list-style-type: none"> <li>• Corporate Communications and Public Relations</li> </ul>

**Legend:** (A) Annually (AR) As Required (Q) Quarterly (R) Regularly

The results of stakeholder engagement feed into the materiality assessment process described in the succeeding section. It also informs the development or update of the sustainability and plan.

To measure engagement effectiveness, outcomes and impacts of our engagement with our stakeholders, we conduct interviews with target stakeholders of our initiatives (local communities) and partnerships (with business partners, suppliers and vendors, government and regulators, NGOs and advocacy groups, media), employee engagement survey (Board and management, employees), NPS (Net promoter score) for customers, and survey and relationship management with our investors (by Investor Relations team) and creditors (by Treasury).

#### 4.4 Materiality Assessment

To identify the most important sustainability topics to us and our stakeholders, we review our material topics from the previous reporting period to account for changes in potential and actual impacts. Our objective is shaping the materiality assessment approach to make it more systematic, robust and partnership-oriented, in line with the principle of **Materiality** in the AA1000AP framework. Hence, we:

- Conduct stakeholder engagement and materiality assessment in accordance with GRI 3 (Material Topics), the AA1000 Stakeholder Engagement Standard, and the AA1000 Accountability Principles
- Identify the relevant sustainability issues while considering the input from the research and key stakeholders
- Make the result of the materiality assessment transparent via our sustainability report
- Use interactive communication way to ensure that information can be exchanged, and feedback can be heard and responded during the engagement process



The following are the general steps in conducting a materiality assessment:

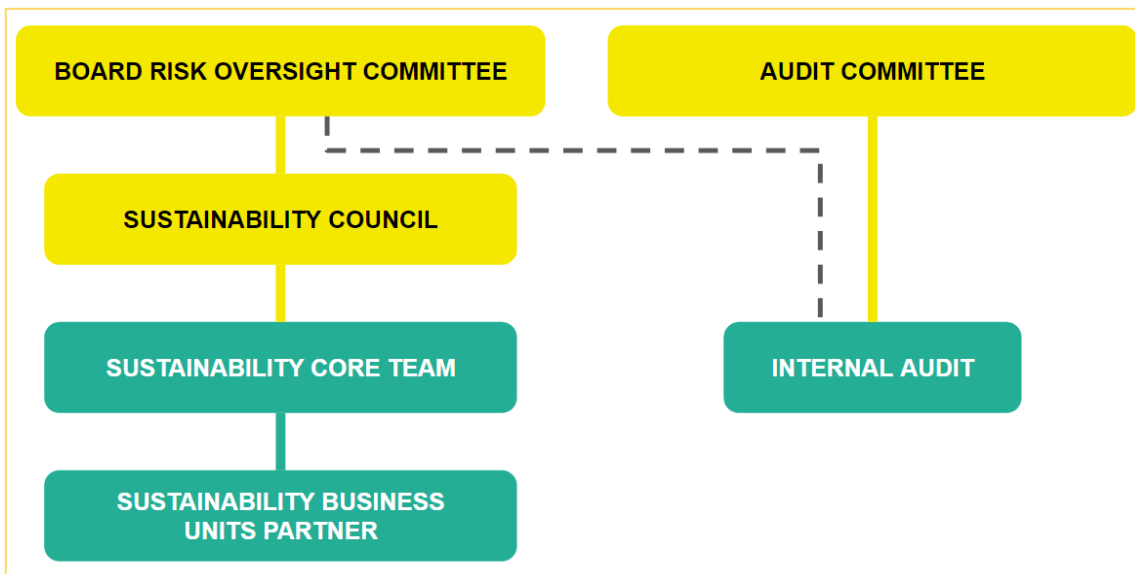
1. Understand the organization's context by considering the organization activities, business relationships, stakeholders, and sustainability context
2. Identify impacts on the stakeholders, the degree that the stakeholder will be impacted by the organization (vulnerability) and the degree of Influence that the stakeholder has over the organization.
3. Identify the relevant sustainability issues to the business and stakeholders
4. Assess the significance of the impact and develop a mechanism to engage the identified stakeholders in the assessment
5. Prioritize the sustainability issues that have the most significant impacts on stakeholders' (Impact Materiality)
6. Prioritize the sustainability issues that internally impact the financial performance and the company's ability to create economic value added for investors and shareholders (Financial Materiality), considering the following:
  - Survey of Board and Management
  - Review of key topics of concern of rating agencies, institutional investors, and SASB
  - Assessment of impact on business objectives, organizational engagements and commitments
  - Application of ERM framework to assess organizational risk (management action, operational, regulatory compliance, reputation, environmental/health/safety/security, and legal)
7. When conflicts or dilemmas arise from varying expectations related to material topics among different stakeholder groups, the Sustainability Council will re-evaluate the ranking of material topics based on the severity of impact on those stakeholders, company's priority objectives and critical risks. Afterward (and upon approval by the Board Risk Oversight Committee), the Sustainability Council will communicate the results to the relevant stakeholders or their representatives for their feedback as may be appropriate.
8. Present and obtain approval of the assessment result to the BROOC (Board Risk Oversight Committee), and the Board.

## 5. Sustainability Governance

The stakeholders that are impacted by our business activities or conversely, have activities impacting our businesses, are concerned about how the Company is directed and monitored. We have put in place a Sustainability Governance System to enable the Company to supervise, assess and improve the sustainability performance on a timely basis. This includes identifying and managing impacts on the economy, the environment and society (including human rights), as well as the related risks and opportunities for the Company. Sustainability-related risks and opportunities (including but not limited to climate-related risks and opportunities) will be a particular area of focus for sustainability governance.

## 5.1 Sustainability Governance Structure

Our Sustainability Governance Structure consists of committees and groups that influence the decisions and actions we take with respect to sustainability. All levels of the party have clear roles and responsibilities. This can ensure the information can be communicated at the right time to the right party. To raise the effectiveness of the governance system, we have an Audit Committee and Internal Audit to review the sustainability performances and risks independently. The following is the structure:



## 5.2 Roles and Responsibilities of the Key Parties

Our governance structure contains four levels, the board’s oversight level, the top management’s supervisory level, the business unit’s execution level and the independent internal audit level.

### *Board Risk Oversight Committee*

- Oversees the development and implementation of Sustainability Strategy and Plan
- Oversees strategies designed to respond to sustainability-related (including climate) risks and opportunities
- Reviews and approves the Sustainability Report
- Ensures the Company’s sustainability plan and support are aligned with best practices and applicable authoritative international instruments, local and international laws, regulations and standards
- Ensures that sustainability-related and climate-related risks and opportunities are taken into consideration when making investment decisions (for example, plans for capital expenditure, major acquisitions and divestments, joint ventures, business transformation, innovation, new business areas, and asset retirements)
- Reviews the effectiveness of the system for monitoring non-financial and operational compliance matters that impact sustainability

- Receives and reviews reports from Internal Audit on the Company's sustainability programs and reporting
- Appoint and oversee the work of a qualified external assurance provider to deliver independent third-party assurance of the Company's sustainability reports

### *Sustainability Council*

- Communicates the importance of sustainability throughout the organization
- Provides overall guidance and governance in establishing and executing the sustainability strategy
- Reviews the sustainability performance and strategies regularly
- Review and address conflicts or dilemmas arising from differing expectations regarding material topics.

### *Sustainability Core Team*

- Headed by the Chief Sustainability Officer
- Sets sustainability strategy in collaboration with the Sustainability Business Unit Partners
- Recommends and monitors sustainability Key Performance Indicators (KPIs) and initiatives, and regularly reports the performance results to the BROCC
- Compiles the Sustainability Report

### *Sustainability Business Unit Partners*

- Provides KPI targets, actual KPI data, and specific action plans for sustainability reporting
- Executes action plans and reports the progress to the Sustainability Core Team and/or Sustainability Council

### *Audit Committee*

- Oversees internal controls over sustainability reporting
- Monitors Internal Audit function in the provision of independent assurance over sustainability disclosures
- Reviews any financial statement impacts of sustainability risks and commitments

### *Internal Audit*

- Reviews reporting metrics for relevance, accuracy, timeliness and consistency
- Reviews sustainability reporting for consistency with formal financial disclosure filings
- Reviews materiality or risk assessments on sustainability reporting
- Incorporates sustainability into regular audit plans

## 6. Sustainability Approach

Our sustainability approach is inextricably linked with the aspiration to digitize the country for a sustainable and prosperous future. We aspire to build a business model focused on providing high-speed fixed broadband to millions of unserved and underserved households and businesses across the Philippines.

Our sustainability management system is based on continuous due diligence, and is designed to effectively address identified actual negative impacts where CICT has been identified to have caused or contributed to. This enables us to adhere to the principle of **Responsiveness** under the AA1000AP framework.

To ensure that our business creates positive impact while minimizing negative impact on the economy, environment, and people, we strive to embed sustainability in our strategy and operations. With an integrated sustainability framework and globally recognized reporting standards, we intend to contribute to the United Nations’ Sustainable Development Goals (UN SDGs), and local and global targets.

Our sustainability management system also takes into account the company's exposure to specific climate-related risks and opportunities, which have the potential to impact both our current and future financial positions. We employ an integrated approach that combines our strategic planning and risk management processes to guide our decision-making regarding these climate-related factors. This includes identifying the risks associated with climate change and determining the most appropriate strategies to address them, whether through mitigation, transfer, acceptance, or control. We also explore strategies that capitalize on climate-related opportunities that align with our business objectives.

## 6.1 Pillar 1: Delighting Customers by Taking Care of Our Own (Social & Economic)

We prioritize end-to-end customer satisfaction and safety through affordable services, robust processes, reliable technology and infrastructure, and service-oriented people. We foster a diverse and inclusive culture that prioritizes professional growth, continuous learning and development, and overall health and safety.

Linkage to UN SDGs	AmBisyon Natin 2040 Themes
<b>SDG 3:</b> Good Health and Well-being	<ul style="list-style-type: none"> <li>● Ensure peace and security</li> <li>● Build Safe, Resilient, and Sustainable Communities</li> <li>● Transform Human Capital Development Towards Greater Agility</li> <li>● Reduce Vulnerabilities of Filipinos</li> <li>● Maximize demographic dividend across the different regions in the country</li> </ul>
<b>SDG 4:</b> Quality Education	
<b>SDG 5:</b> Gender Equality	
<b>SDG 8:</b> Decent Work and Economic Growth	
<b>SDG 9:</b> Industry, Innovation and Infrastructure	
<b>SDG 10:</b> Reduced Inequality	
<b>SDG 16:</b> Peace and Justice Strong Institutions	

## 6.2 Pillar 2: Operating a Responsible Company and Leading with Integrity and Good Governance (Social, Economic & Governance)

As a corporate citizen, we promote a culture of integrity and good governance that is responsible to its different stakeholders. We aim to drive more sustainable operations through risk management and business resiliency.

Linkage to UN SDGs	AmBisyon Natin 2040 Themes
<p><b>SDG 11:</b> Sustainable Cities and Communities</p> <p><b>SDG 13:</b> Climate Action</p> <p><b>SDG 16:</b> Peace and Justice Strong Institutions</p>	<ul style="list-style-type: none"> <li>• Build Safe, Resilient and Sustainable Communities</li> <li>• Reduce Vulnerabilities of Filipinos</li> <li>• Ensure Responsive, People-centered, Technology-enabled, and Clean Governance</li> <li>• Promoting Competition</li> </ul>

## 6.3 Pillar 3: Giving Back to Our Planet (Environment)

We operate our business while minimizing any adverse impact to the environment. With respect to Pillar 3, in line with the precautionary approach (precautionary principle of the Rio Declaration on Environment 1992), we are committed to understand, manage and reduce our environmental footprint across our value chain to create positive impact.

Linkage to UN SDGs	AmBisyon Natin 2040 Themes
<p><b>SDG 3:</b> Good Health and Well-being</p> <p><b>SDG 7:</b> Affordable and Clean Energy</p> <p><b>SDG 8:</b> Decent Work and Economic Growth</p> <p><b>SDG 11:</b> Sustainable Cities and Communities</p> <p><b>SDG 12:</b> Responsible Consumption and Production</p>	<ul style="list-style-type: none"> <li>• Ensure Ecological Integrity, Clean and Healthy Environment</li> </ul>

## 6.4 Pillar 4: Creating Positive Community Impact (Social & Environment)

In our goal to empower communities, we create positive experiences in the community as part of our role in society through investments, cooperation and volunteer work. We ensure to respect different cultures and social differences in the areas we operate in.

Linkage to UN SDGs	AmBisyon Natin 2040 Themes
<p><b>SDG 5:</b> Gender Equality</p> <p><b>SDG 8:</b> Decent Work and Economic Growth</p> <p><b>SDG 9:</b> Industry, Innovation and Infrastructure</p>	<ul style="list-style-type: none"> <li>• Expand opportunities across regions</li> <li>• Expand access to economic opportunities including the digital economy</li> </ul>

Linkage to UN SDGs	AmBisyon Natin 2040 Themes
<b>SDG 16:</b> Peace and Justice Strong Institutions	<ul style="list-style-type: none"> <li>• Scale up technology adoption</li> </ul>
<b>SDG 17:</b> Partnerships to achieve the Goals	<ul style="list-style-type: none"> <li>• Accelerate strategic infrastructure development</li> </ul>

## 7. Sustainability Budget

In line with the principle of **Impact** in the AA1000AP framework, our sustainability business unit partners should continually develop initiatives and programs that are aligned with the company strategy to achieve our sustainability goals and targets. The development of sustainability initiatives must be done regularly, and in accordance with the Corporate Performance Cycle of CICT. This includes the annual planning and budgeting that undergoes the approval of the Board.

All other projects and initiatives related to Sustainability which were not approved as part of the annual planning and budgeting process must undergo the MFAI (Memorandum for Approval and Implementation) process. These projects must be approved in accordance with the company Delegation of Authority Matrix.

## 8. Review of Sustainability Performance

We regularly review progress and achievement against our sustainability goals and targets, in line with the principle of **Impact** in the AA1000AP framework. The Sustainability Core Team compiles the sustainability performance and progress in coordination with the different Sustainability Business Unit Partners and presents this to the Board Risk Oversight Committee quarterly. This gives us insight to improve and gauge how far we are from our goals.

### 8.1 Performance Measurement

#### 8.1.1 Key Performance Indicators

Sustainability KPIs are based on the local and international reporting requirements and standards used in our sustainability report. These KPIs are discussed and agreed upon on a periodic basis.

#### 8.1.2 Data Reporting Schedule

To the extent possible, sustainability data will be compiled at least quarterly for economic, environmental, social KPIs. Some specific workforce-related KPIs will be collected annually.

#### 8.1.3 Documentation Requirements

The data reported for sustainability should be supported by internal controls or documentation that could be reviewed and verified by an external third party.

## 8.2 Reporting & Disclosure

To ensure the transparency of our management of the economic, environmental, social and governance issues of our organization, we will periodically publish a Sustainability Report alongside disclosures to interested parties such as but not limited to: UNGC COP (Communications on Progress), submission to CDP, responses to questionnaires from investors, analysts and rating agencies, and sustainability news and press releases. We view reporting and disclosure as an important communication tool to convey our message to the stakeholders. Interested parties can find our reports and other disclosures on the corporate website.

Our annual Sustainability Report will comply with Sustainability Reporting Guidelines for Publicly-Listed Companies of the Securities and Exchange Commission (MC No. 04 s.2019), and report on our contributions to the Sustainable Development Goals (SDGs) of the United Nations (UN) and AmBisyon Natin 2040. We will also consider relevant internationally recognized sustainability reporting guidelines, frameworks and standards such as:

- Global Reporting Initiative (GRI) Standards,
- Sustainability Accounting Standards Board (SASB) Standards,
- Task Force on Climate-related Financial Disclosures (TCFD) Recommendations
- IFRS Sustainability Disclosure Standards

## 8.3 External Assurance

To enhance the credibility of our sustainability reporting, it is the Company’s policy to engage an independent service provider to conduct external assurance. Selection of the external assurance provider will be conducted through normal procurement processes with the participation of senior management. The Board of Directors will be responsible for approving the appointment of the external assurance provider, upon recommendation of the Board Risk Oversight Committee.

## 9. Policy Amendment

From time to time, the Company may make changes to this Policy to improve the effectiveness of sustainability operation and keep our operation abreast of the local and international trends.

### 9.1 Version Control

Version No.	Date	Description of Change	Owner	Approver
1.0	March 2023	First Version	Lea L. Rocamora	Maria Grace Y. Uy Benjamin Rex Emilio Azada B. Azada



Version No.	Date	Description of Change	Owner	Approver
2.0	October 2023	<p>Inclusion of the following:</p> <ul style="list-style-type: none"> <li>• Assignment of roles and responsibilities for governing sustainability related and climate-related risks and opportunities aligned with IFRS S1 and S2</li> <li>• Approach to strategic and risk management of sustainability-related and climate-related risks and opportunities aligned with IFRS S1 and S2</li> <li>• Replacement of “Audit and Related Party Transactions Committee” with the new Audit Committee. The Related Party Transaction Committee was separated effective May 2023</li> <li>• Methods for addressing conflicts or dilemmas arising from differing expectations regarding material topics in adherence to AA1000 Accountability Principles Standard 2018</li> <li>• Recommendation of external assurance provider for Board Approval will be given by the Board Risk Oversight Committee (BROC) instead of the Audit Committee as recommended and agreed upon by members of the BROC</li> <li>• Other minor revisions for updating the document</li> </ul>	Ma. Patricia Dolores D. Malicse	Please see cover sheet for the list of approvers



## 10. Publication of Policy

To keep our stakeholders informed on this policy, we publish it on the corporate website. If there is any change, we will publish the updated version.

## 11. Related Policy References

This policy was developed with reference with the following documents:

### *External References:*

- AA1000 AccountAbility Principles (AA1000AP, 2018)
- AA1000 Stakeholder Engagement Standard (AA1000SES, 2015)
- GRI Standards 2021
- SASB Telecommunications Services Sustainability Accounting Standard of the IFRS Foundation
- Task Force on Climate Related Disclosures (TCFD) Recommendations
- UN SDGs
- Ten Principles of the United Nations Global Compact
- UN Guiding Principles on Business and Human Rights
- Guidance Principles on Business and Human Rights, Commission on Human Rights of the Philippines
- PNS ISO 26000:2010 Guidance on Social Responsibility
- OECD Due Diligence Guidance for Responsible Business Conduct
- OECD Guidelines for Multinational Enterprises
- IFRS Sustainability Disclosure Standards

### *Internal References:*

- [Manual on Corporate Governance](#)
- [Board Diversity Policy](#)
- [Nomination and Election Policy](#)
- [Succession Planning Policy](#)
- [Related Party Transaction Policy](#)
- [Insider Trading Policy](#)
- [Anti-Trust and Anti-Competition Policy](#)
- [Conflict of Interest Policy](#)
- [Human Rights Policy](#)
- [Code of Business Conduct Policy](#)
- [Anti-Money Laundering Policy](#)
- [Anti-Bribery and Anti-Corruption](#)
- [Whistleblowing Policy](#)
- [Gift Policy](#)
- [Sponsorship Policy](#)
- [Third Party Code of Conduct](#)
- [Personal Data Protection Privacy](#)
- [Child Online Safeguarding Policy](#)
- [Health and Safety Manual](#)
- [Energy Management Policy](#)

**PUBLIC**

This document has been classified for public use.

- [Corporate Stakeholder Commitment Statement](#)
- [Business Continuity Management Policy](#)
- [Quality Policy](#)
- [Continuous Disclosure Policy](#)
- [Sustainability Report 2021](#)
- [Sustainability Report 2022](#)