



# *Open Internet*

## *POLICY*

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Governing policy:	N/A
Policy applies to:	<input checked="" type="checkbox"/> <b>Company-wide</b> <input type="checkbox"/> <b>Specific group or employees only</b>
Documented type:	<input checked="" type="checkbox"/> <b>New</b> <input 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>

Policy / Process Control Review Authority:	<b>Governance and Sustainability Team</b> Corporate Governance and Data Privacy Group	
Governance and Sustainability review owner:	<b>ORIGINAL SIGNED</b>	
	<b>John Michael C. Avila</b> Governance and Sustainability Assistant Manager	Date: <b>3 October 2024</b>
Governance and Sustainability review officer:	<b>ORIGINAL SIGNED</b>	
	<b>Dessa C. Bahia</b> Sustainability Lead	Date: <b>30 September 2024</b>
Product Management review officer:	<b>ORIGINAL SIGNED</b>	
	<b>Atty. Laurice P. Esteban-Tuason</b> Senior Vice President and Corporate Compliance and Data Protection Officer	Date: <b>3 October 2024</b>
Network Operations review officer:	<b>ORIGINAL SIGNED</b>	
	<b>Leonardo A. Baniqued</b> Vice President and Head of Product Management and Development	Date: <b>15 October 2024</b>
Executive approval authority:	<b>ORIGINAL SIGNED</b>	
	<b>Jefferson C. Briones</b> Vice President and Head of Global Network Operations	Date: <b>15 October 2024</b>
Executive approval authority:	<b>ORIGINAL SIGNED</b>	
	<b>Paulo Martin G. Santos</b> Executive Vice President and Chief Network Transformation Officer	Date: <b>28 October 2024</b>
	<b>ORIGINAL SIGNED</b>	
Executive approval authority:	<b>Benjamin Rex Emilio B. Azada</b> Executive Vice President and Chief Commercial Officer and Chief Sustainability Officer	Date: <b>29 October 2024</b>
	<b>ORIGINAL SIGNED</b>	
Executive approval authority:	<b>Grace Y. Uy</b> Co-Founder, President, and Chief Resource Officer	Date:

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Implementation effectivity date:	September 30, 2024
Approval Date of last revision	N/A
Effectivity Date of last revision	N/A
Date of governing policy review*	September 30, 2027

**\*Unless otherwise indicated, this policy shall apply beyond the review date**

<i>Related legislation, standards, policies, procedures, guidelines, and local protocols</i>	<p><b>External References:</b></p> <p>UN Human Rights Council. "The promotion, protection and enjoyment of human rights on the Internet" - A/HRC/47/L.22, 7 July 2021.          Republic Act No. 10667 - Philippine Competition Act          Republic Act No. 7394 - Consumer Act of the Philippines</p> <p><b>Internal References:</b></p> <p>Human Rights Policy - POL-CGDP-REG-0001          Code of Business Ethics - POL-SARC-QRMS-1007          Anti-Trust/Anti-Competition Policy - POL-CSOO-COMPL-0002          Whistleblowing Policy - POL-SARC-QRMS-1011          Whistleblowing Process - PRO-CGDP-BCM-0002          Employee Discipline Policy - POL-CGDP-REG-0001          Blocking of Malicious Websites - POL-NOP-GNOC-007</p>
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## 1. Purpose

Converge Information and Communications Technology Solutions, Inc. (“The Company”) has made a public commitment to sustainability. A key pillar of the Company’s sustainability commitment is to lead with integrity and good governance.

This Open Internet Policy builds on our Human Rights Policy, Anti-Trust/Anti-Competition Policy, and Code of Business Ethics. The purpose is to ensure the principles contained in these policies are applied in the context of our products, services and network management.

## 2. Scope

This policy shall apply to the products and network operations of Converge Information and Communications Technology Solutions, Inc.

## 3. Reference

- UN Human Rights Council. “The promotion, protection and enjoyment of human rights on the Internet” - A/HRC/47/L.22, 7 July 2021
- Republic Act No. 10667 - Philippine Competition Act
- Republic Act No. 7394 - Consumer Act of the Philippines

## 4. Definitions

Term	Definition
Content Delivery Networks	A geographically distributed group of servers which work together to provide fast delivery of Internet content, by delivering content closer to users.
Human Rights Due Diligence	The ongoing process taken to identify, prevent and mitigate and account for negative human rights impacts which the company may cause or contribute to through its own activities, or which may be directly linked to the company’s products, operations, or services by a business relationship.

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Term	Definition
Open Internet	No unreasonable or discriminatory interference with users' access to legitimate content or data on the internet.
Peering	Agreement between internet service providers to exchange traffic with each other for mutual benefit.
Zero Rating	The practice of not charging customers for data use on specific websites and services by an internet service provider.

## 5. Policy Statements

The Company believes that internet users should have access to all legal, publicly available content on the internet. Accordingly, to protect the interests of its customers, the Company:

- Will not block, slow down, or unreasonably discriminate against any legal internet content, applications, or services based on their source or content;
- Will not prioritize traffic in a way that harms competition or consumers;
- Will only engage in peering, content delivery networks, or other similar connectivity agreements that will result in a better overall customer experience without compromising open internet principles;
- Will conduct a human rights due diligence and competition law compliance review in accordance with the Company's Human Rights and Anti-Competition policies before offering any zero rating schemes, peering, content delivery network agreements, or similar arrangements.
- Will ensure compliance with lawful orders and other government requests, adhering strictly to regulatory requirements.

To avoid network congestion and deliver a superior customer experience, the Company will continue to use reasonable network management practices in line with industry standards.

## 6. Policy Outline

This Open Internet Policy ensures the commitment of Convergence to integrity, good governance, and sustainability through customers' fair access to all legal and publicly available online content. As the digital highway of the nation, this policy prohibits unfair discrimination of content based on their source or content, while also ensuring traffic prioritization does not harm competition or consumers. Network management practices will be reasonable, aligned with industry-standards, and transparent to avoid network congestion. Compliance with the

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Company's relevant policies as well as other lawful orders and government requests will also be ensured. Regular policy review shall likewise be in place to align with emerging technological advancements and regulatory requirements.

## 7. Implementation and Communication

Relevant groups and departments, particularly Product Management and Network Solutions, Innovation, and Network Operations, will comply with this policy when developing new products and services, or considering peering arrangements, content delivery network agreements, or other similar arrangements with other service providers.

This policy will be communicated internally to all team members involved in:

- Innovation
- Product development and management
- Network operations

Additionally, this policy will be posted on our website for the benefit of our employees, customers, business partners, and other stakeholders.

## 8. Non-Compliance and reporting process

An employee found to have violated the provisions of this Policy may be subject to disciplinary action in accordance with the Company's Employee Discipline Policy.

Any person, with knowledge of, or has observed, any form of disregard for this policy or any act analogous to the same, may choose to file a report through the whistleblowing reporting channels for immediate attention. Further details on how the Company handles reports can be found in its Whistleblowing Policy and Whistleblowing Procedure documents.

## 9. Related document references

- Human Rights Policy - POL-CGDP-REG-0001
- Code of Business Ethics - POL-SARC-QRMS-1007
- Anti-Trust/Anti-Competition Policy - POL-COO-COMPL-0002
- Whistleblowing Policy - POL-SARC-QRMS-1011
- Whistleblowing Process - PRO-CGDP-BCM-0002
- Employee Discipline Policy - POL-CGDP-REG-0001

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

From time-to-time the Company may amend this Policy and set out relevant guidelines to continuously improve its suitability, adequacy, and effectiveness.

Version No.	Date	Description of Change	Author	Approver
1.0	September 30, 2024	Initial Draft	John Michael C. Avila Dessa C. Bahia	Laurice P. Esteban-Tuason Benjamin Rex Emilio B. Azada

## 11. Annex

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