



FUTURE READY CODE OF ETHICS AND CONDUCT POLICY

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Purpose

Etiqa Life and General Assurance Philippines, Inc. (Etiqa Philippines) has a responsibility to safeguard its integrity and credibility. This is necessary to preserve clients' and stakeholders' confidence in the business of the company.

As we know, the public places a very high level of trust and confidence on our employees especially those involved in higher responsibility. In fact, we owe this to our customers and it is everybody's responsibility to ensure that our Organization is professionally managed and soundly based. Employees are expected to carry out business activities and represent the company with highest standards of conduct in letter and in spirit of the Code of Ethics.

As such, it is necessary to have documented ethical rules to be issued as guidelines in order to achieve such a level of conduct and behavior for every employee.

This Code of Ethics and Conduct of employees stipulates the sound principles that will guide all employees in Etiqa Philippines in discharging their duties.

Coverage of the Code

This Code of Ethics and Conduct applies to all employees working in Etiqa Philippines. Certain clauses will continue to apply to the employee even after they have ceased employment with Etiqa Philippines.

All employees in Etiqa Philippines are bound to observe all legislations which may have a more comprehensive coverage of the subject matters contained in this Code.

The provision of this Code is deemed to be part of the Terms and Conditions of Service for all employees.

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1.0 Conflict of Interest

Employee must not engage directly or indirectly in any business activity that competes or conflict with Etiqa Philippines' interest. These activities include, but are not limited to the following:-

a. Outside Financial Interest

Where employee has a financial interest in a customer, whether as a sole proprietor, partner, shareholder, creditor or debtor, such an interest must be disclosed immediately to the employee's immediate supervisor who in turn should report to the management. Thereafter, the employee should not be directly involved in Etiqa Philippines' dealings with the customer so long as the interest continues to exist.

The above restriction does not apply in cases where employee has holdings of publicly quoted securities unless the management considers the interest to be material, and the financial interest is considered likely to impair the objectivity of the employee concerned. In any case, holdings of five (5) percent or more of the voting shares of a public quoted company would be regarded as material.

When a conflict of interest arises between Etiqa Philippines and the customers or between the employee and the customers and where such conflict is apparent, the customer should be made aware of the consequences that may arise from the obligation.

In assigning duties, supervisors should not place their subordinates in situations where conflict of interest could arise.

b. Other Business Interest

It is considered a conflict of interest if an employee conducts business other than Etiqa Philippines' business during working hours.

Where the acquisition of any business interest or participation in any business activity outside Etiqa Philippines and working hours demands excessive time and attention from the employee, thereby depriving Etiqa Philippines of the employee's best effort on the job, a conflict of interest also arises.

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c. Other Employment

Before making any commitment, employee is to discuss with the management on possible part-time employment or other business activities outside the financial institution's working hours. The written approval of ELGAP Human Capital Head or any other designated person should be obtained before the employee embarks on a part-time employment or other business activities. Approval should be granted only where the interest of Etiqa Philippines will not be prejudiced.

Employee shall devote his whole time and attention during working hours to his duties in Etiqa Philippines.

d. Entertainment and Gifts

Giving and receiving of gifts can affect or be seen to affect business judgment hence may give rise to a conflict of interest. In such circumstances employees are to strictly comply with the Etiqa Philippines' Corporate Gifts and Entertainment Policy when it comes to receiving or giving of gifts and receiving or giving of entertainment to/from any third parties, including but not limited to the Etiqa Philippines' customers, suppliers/vendors or consultants.

e. Credit Facilities

Employee should not approve credit facilities or any other transactions:-

- a. To themselves;
- b. To any of their family members; and
- c. To firms, companies or corporations in which they or their family have an interest

Employee should not derive any improper benefits either in kind or in monetary at the expense of Etiqa Philippines or its customers.

Employee also should not obtain for themselves or any of their family members any property or any business advantage that properly belongs to Etiqa Philippines or to its customers.

f. Corporate Directorship

Employee must not solicit corporate directorship. An employee should not serve as a director of another corporation without the approval of the Board of Directors. Employees who hold directorships without such approval must seek approval immediately, if they wish so to remain as directors of other corporations.

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However, employee may act as directors of non-profit Public Service Corporations, such as religious, educational, cultural, social, welfare, philanthropic or charitable institutions, subject to policy guidelines in Etiqa Philippines.

g. Trusteeships

Employee must not solicit appointment as executors, administrators or trustees of Etiqa Philippines' customers' estates. If such an appointment is made and the employee is beneficiary of the estate, his signing authority for the estate's bank account(s) must be approved by the Board of Directors who will not unreasonably withhold approval.

2.0 MISUSE OF POSITION

2.1 Employee should not abuse their position in Etiqa Philippines to take advantage of any information obtained in the course of duty for personal benefit or for the benefit of other persons.

2.2 Employee should not make use of their position in Etiqa Philippines to solicit or receive favors from the Etiqa Philippines' customers in exchange either for:-

- granting them free insurance;
- granting them favorable insurance terms and conditions; or
- deliberately not exercising due diligence on delinquent accounts for a favor.

2.3 Employee should not bribe customers when soliciting business. Corporate gifts offered or presented to customers on marketing trips, and gifts offered for deposits are not considered examples of bribes.

2.4 Employee should not solicit the following from customers or other parties:-

- favors;
- preferential or concessionary offers; or
- gifts of any form, including cash, bonds, negotiable securities, personal loans, airline tickets, discounts or use of vacation or other entertainment facilities or property.

2.5 Employee should, whenever possible, discourage their customers and brokers from offering them personal gifts, favors or services.

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2.6 Employee should not make use of their position in Etiqa Philippines:-

a. To solicit corporate directorships from Etiqa Philippines’ customers, unless the member of employee is appointed to the Board to represent Etiqa Philippines’ interest; or

b. To borrow from or become indebted to these customers.

2.7 It is the duty of all employees to ensure that no other employee in Etiqa Philippines should misuse his or her position in the organization. Employees who are aware of any such irregularities in the course of their work owe a duty to report such irregularities in confidence to Etiqa Philippines.

2.8 Employee must not use Etiqa Philippines’ name or facilities for personal advantage in political, investment or retail purchasing transaction, or in similar types of activities. Employee and their relatives, must not use their connections with Etiqa Philippines to borrow from or become indebted to customers or prospective customers. The use of position to obtain preferential treatment, such as in purchasing goods, shares and other securities, is strictly prohibited.

2.9 Further, employee must not use Etiqa Philippines’ facilities and influence for speculating in commodities, gold, silver, foreign exchange or securities, whether acting personally or on behalf of friends or relatives. Such misuse of position may be grounds for dismissal. Employee should also not provide mutually beneficial transactions to employees of other institutions in return for similar facilities designed to circumvent the provisions contained in this Code.

Note: Under this clause, reference to ‘customers’ wherever it appears also include reference to ‘vendors/suppliers of goods and services’.

3.0 MISUSE OF INFORMATION

3.1 Employee should not copy, remove or make use of any information obtained in the course of business for the direct or indirect benefit of themselves or of any other persons.

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3.2 It is regarded as a misuse of such information if an employee uses information of Etiqa Philippines or customers to benefit themselves or confer an advantage on themselves or any other persons.

3.3 Employee in possession of confidential information should not use it in the following ways for the benefit of themselves or any other persons:-

- a. To influence any customer or any third party in dealing in any transaction: or
- b. To communicate such information to any customer.

3.4 The above prohibitions relating to the misuse of information continues even after the employee ceases to be employed by Etiqa Philippines.

3.5 Employee in one division, department or branch should not retrieve or obtain information of the organization or customer from another division, department or branch unless the information to receive is necessary in their course of work. Any transmission or transfer of information among the divisions, department or branches should be properly authorized.

4.0 INTEGRITY AND ACCURACY OF RECORDS/TRANSACTIONS

4.1 Employee should ensure that accurate and complete records of Etiqa Philippines' operations are kept and maintained in such a form and for such a period as determined by Etiqa Philippines. These records include the following:-

- i) Books, slips, documents, statement;
- ii) Computer tapes and diskettes;
- iii) Computer programmes;
- iv) Microfiches/microfilms; and
- v) Computer print-outs

4.2 Employee should never make entries or allow entries to be made for any account, record or document of Etiqa Philippines that are false or would obscure the true nature of the transactions as well as to mislead the true authorization limits or approval by the relevant authority of such transactions.

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- 4.3** Employee should ensure that any alteration or deletion to records is properly authorized by their superiors. Any removal of records must also be properly documented.
- 4.4** Employee must ensure that Etiqa Philippines' information and records are not copied by unauthorised persons including computer vendors.
- 4.5** Employee should report to their superior immediately upon discovery of any unauthorised copying, entries, deletions or alterations in Etiqa Philippines' records.
- 4.6** All records and computer files or programs of Etiqa Philippines, including personnel files, financial statements and customer information, must be accessed and used only for the management-approved purposes for which they were originally intended.
- 4.7** Employee in which Etiqa Philippines operates in should refer to their local laws and regulation on the provisions that provide for criminal penalties against any director, manager, trustee, auditor, employee or agent of a licensed insurer who is guilty of willfully making a false entry, or omitting, altering, abstracting, concealing or destroying any entry in the company's books of record, reports or documents.

5.0 FAIR AND EQUITABLE TREATMENT

- 5.1** All business dealings on behalf of Etiqa Philippines with current and potential customers, with other members of the employee and with all those who may have caused to rely upon Etiqa Philippines, should be conducted fairly and equitably. Employee must not be influenced fairly by friendship or association, either in meeting a customer's requirements or in recommending that they be met. Such decisions must be made on a strictly arm-length business basis. All preferential transactions with insiders or related interest should be avoided. If transacted, such dealings should be in full compliance with the law, judging on normal business criteria basis and fully documented and duly authorized by the Board of Directors or an independent party.
- 5.2** No member of employee shall offer any bribe or similar consideration to any person or company in order to obtain business for Etiqa Philippines'. Any commissions paid or other payments made, or favorable terms conceded, or other advantages given, by any employee

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member in the conduct of Etiqa Philippines' business shall be in accordance with Etiqa Philippines' policies on such matters as notified from time to time and shall be promptly recorded in writing.

6.0 RELATIONSHIP WITH CUSTOMERS

- 6.1 Employee should draw customers' attention to the terms and conditions governing each insurance service provided, including all applicable insurance charges
- 6.2 Employee should respond readily and promptly to customers' enquiries on the terms and conditions of insurance services including insurance premiums.
- 6.3 For matters of abnormal or of suspected abnormal nature in a Department (such as fraud/defalcation, robbery/theft, cash discrepancy and loss of important document), the Department Manager or Head of Unit/Sector should immediately inform Internal Audit Head and PCEO by giving all the information required.
- 6.4 Departments Heads should report all customer complaints promptly to the Customer Advocacy Department and copy to Head – Customer Advocacy Department.

7.0 CONFIDENTIALITY

- 7.1 The confidentiality of relations and dealings between Etiqa Philippines' and its customers is paramount in maintaining Etiqa Philippines' reputation. Employee is required to keep confidential on all information relating to Etiqa Philippines' customers. Employees should abide by the Personal Data Privacy Law that is enforced in the Philippines.
- 7.2 Employee should not remove or relocate documents or records of customers out of their divisions/departments/branches without the prior approval of their respective managers or department heads.
- 7.3 Employee has a duty to continue protecting the confidentiality of customer information even after cessation of employment with Etiqa Philippines' and except with Etiqa

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Philippines' consent, employee shall not divulge or to make use of any secret, copyright material or any correspondence, accounts or dealings of Etiqa Philippines' or its customers. No employee shall in any way use information so obtained for financial gain.

- 7.4 Employee should not reveal to third parties any names or other information in connection with any dealings or transactions with any customer.
- 7.5 Confidential information concerning a customer may be given or made available to third parties only with prior written consent of the customer, when disclosure is authorized under any laws and regulations of respective countries to be made to a police officer investigating into an offence specified in such law, regulations and other permitted disclosures.
- 7.6 All employees must refer and comply with the Data Privacy Manual of Etiqa Philippines.

8.0 MAKING PUBLIC STATEMENTS

- 8.1** All employee shall not, during or after termination of his employment with Etiqa Philippines':-

- Publish or cause to be published or circulate any articles, statements, books, photographs or letters; and/or
- Give away any interview or broadcast or deliver any lectures or speeches on any matter which concerns his duties or the policies, decisions or the business of Etiqa Philippines' or any matter connected with Etiqa Philippines' without obtaining the prior written consent of Etiqa Philippines.

- 8.2** For making public statements, the following designated posts are exempted from seeking written permission from Etiqa Philippines if the act is in line with the discharge of official duties of the employee:-

- Chairman;
- Vice Chairman;
- President & CEO;
- Any spokesmen or persons so designated by the Chairman/Vice Chairman or President & CEO to do so.
- If permission is granted, it shall be subjected to an implied condition that:-

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- a. The proposed publication shall not be published as may reasonably be implied that it had received official support or backing or sponsorship from Etiqa Philippines; or
- b. The proposed publication shall not bear the words “approved publication” or words to that effect.

8.3 Employee wishing to seek permission to publish or write a book or article based on official information must write to the Human Capital Head or any other designated persons, giving details of the proposed publishing of the book or the article.

9.0 SOCIAL MEDIA USAGE

When using social media such as, but not limited to, personal blogs, social media including Facebook or Twitter, employees are to be mindful that they do not disclose confidential information about Etiqa Philippines’ business, its customers and all other matters related to Etiqa Philippines. Employees are not authorized to make any commentaries on behalf of Etiqa Philippines and especially those that would adversely affect the image and reputation of Etiqa Philippines. Employees are prohibited from using/editing Etiqa Philippines’ logos, pictorial images related to Etiqa Philippines and trademarks in their own personal social media accounts. Further, employees are required to comply with Etiqa Philippines’ Social Media Usage Policy, Social Media Guidelines, IT Policy on Usage of Internet and IT Policy on Usage of Email when using social media.

10.0 REQUIRED KNOWLEDGE AND COMPLIANCE

- 10.1 Employee, particularly at the senior level, should keep up-to-date with and comply with the applicable laws, rules and regulations in their respective area of operations.
- 10.2 Line Managers are required to take reasonable steps to ensure that their subordinates are kept informed of and are familiar with all applicable laws or regulations relevant to their respective operations. They should up-date their subordinates on any change in such laws or regulations.
- 10.3 Employees who are not familiar with the laws and regulations applicable in their area of operations should seek guidance from their immediate superior.

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11.0 PECUNIARY EMBARRASSMENT

11.1 Employee is expected to manage their financial matters well. Etiqua Philippines takes a very serious view such “pecuniary embarrassment” i. e. the state of one’s indebtedness.

11.2 Employee is deemed to be in state of pecuniary embarrassment:-

- a. Where he is a judgment debtor, for as long as the judgment debt remains unsettled and a stay of execution has not been granted; or
- b. Where he is a bankrupt or an insolvent wage earner, for as long as he remains as an undischarged bankrupt or for as long as any judgment against him in favor of the official assignee remains unsatisfied and a stay of execution has not been granted.

12.0 AVENUE TO EXPRESS VIEWPOINT OR COMPLAINT

12.1 Employee may express their viewpoint or their complaint, on any matter or person with Etiqua Philippines’ interest at heart, direct to the Human Capital Head in writing or may refer to the secured channels of the Whistle Blowing Policy as another venue for complaints.

13.0 MONEY LAUNDERING AND TERRORISM FINANCING

13.1 Money Laundering is the process by which one conceals funds of dubious or illegal origin and then disguises them as legitimate proceeds of lawful activities.

13.2 All employees must abide by the respective countries laws and regulation pertaining to the Anti-Money Laundering which provides for the offence of money laundering, the measures to be taken for the prevention of money laundering and terrorism financing offences and to provide for the forfeiture of terrorist property and property involved in, or derived from, money laundering and terrorism financing offences, and for matters incidental

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thereto and connected therewith.

14.0 COMPUTER CRIMES

14.1 All employees need to abide with their respective laws and regulation on computer crimes. Four (4) main offences relating to misuse of computers as stated below:-

- Hacking and unauthorized access to computer material;
- Unauthorized modification of the contents of Etiqa Philippines' computers;
- Unauthorized communication directly or indirectly of a number, code, password or other means of access to Etiqa Philippines' computers; and
- Abetment and attempts to commit the offences described above.

15.0 SEXUAL HARASSMENT

Every employee is entitled to work in a safe and conducive environment. The company views sexual harassment as a serious offence and appropriate action will be taken against any employee found guilty of committing the offence. Examples of sexual harassment:

- Jokes of a sexual nature;
- Touching or any bodily contact offensive to the person;
- Repeated requests for dates;
- Transmitting e-mails, text messages or pictures of a sexual nature; and
- Displaying picture, objects of a sexual nature.

All incidences of sexual harassment must be reported to Group Human Capital for further investigation. Countries are required to adopt the spirit of this provision into their respective local policies. Countries are to ensure that their local laws and regulations in respect of sexual harassment are observed.

All employees are required to refer and comply with the Sexual Harassment Policy and Procedure of Etiqa Philippines.

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17.0 DRESS CODE

All employees are to ensure that they abide by Etiqa Philippines' dress code since this sets the standard for our professional and business image - what is appropriate and not appropriate for work; so that everyone would have a clearer picture be it business formal (that is applicable from Monday to Thursday) or business casual ("dress down" Friday).

Any disregard by an employee to the dress code shall be subject to disciplinary action/penalty under Section G. Offenses or Violations, a. Office Attire of the ELGAP Employee Handbook.