

ANTI-BRIBERY AND CORRUPTION POLICY

The Bank conducts its business in a legal, honest and ethical way and does not tolerate any form of bribery or corruption to obtain an unfair advantage. It shall not offer, pay or receive bribes directly or indirectly. It shall comply with this Policy (as also embodied in the Bank's Code of Conduct for its employees), Republic Act No. 3019 (or the Anti-Graft and Corrupt Practices Act) and all applicable anti-bribery and corruption laws and/or regulations that penalize such acts. This policy shall apply to dealings and transactions of the Bank, its directors and employees, with its clients, service providers, counterparties and other third parties.

Towards this end, all directors and employees of the Bank are prohibited from:

- a. Soliciting, arranging or accepting a bribe, facilitation payments and kickbacks for the benefit of the Bank, its director or employee or for the benefit of his/her family, friends, associate or acquaintances;
- b. Offering, promising or giving a bribe to public officials or other private individuals, directly or indirectly on behalf of the Bank; and
- c. Abusing entrusted power and authority.

No director or employee shall be sanctioned or admonished for refusing to pay a bribe or misuse entrusted power and authority regardless of the financial impact to the Bank. On the other hand, a breach to this policy shall result in sanctions, regardless of any benefit to the Bank that may have arisen as a result of the bribe or misuse of entrusted power and authority.

Any knowledge of bribery/corruption may be reported following existing guidelines under the Bank's Whistle Blowing Policy.