

PHILIPPINE SAVINGS BANK CODE OF BUSINESS CONDUCT & ETHICS

The Bank's **Code of Conduct** defines standards that the Bank's officers and staff must follow in all their business dealings and relationships with the various stakeholders of the Bank.

Its primary objectives are the following:

- Articulate the Bank's values and principles to its employees by defining and enumerating the standards on acceptable conduct, behaviour, and action in the workplace;
- Present a central guide and reference for employees to support their day-to-day decision making, empowering them to handle ethical dilemmas;
- Provide benchmarks against which individual and organizational performance can be measured;
- Reinforce the Bank's commitment to high standards and right conduct;
- Comply with labor, statutory, and regulatory standards and requirements, as well as the terms of the Collective Bargaining Agreement (CBA);
- Avoid or mitigate legal, reputational, and financial risks associated with government finds for ethical misconduct; and
- Define, clarify, and emphasize the role of the different units and committees of the Bank involved in the investigation, hearing, deliberation, and decision of an offense committed by an employee.

The Code includes the following provisions:

- Disciplinary Management framework and process;
- General policies to establish a professional working environment and secure a favorable reputation for our Bank, relating to:
 - Work schedules, attendance, punctuality, and schedule adherence
 - Required corporate and attire requirements
 - Conduct and behaviour such as but not limited to: gambling / betting; handling of personal finances and affairs; conflict of interest; acceptance of gifts; dealings with clients, suppliers, contractors, and service providers; self-dealing transactions; running for or appointment in a public or government office; interlocking positions and/or external activities; insider information; bribery and corruption; sales and solicitations; social media engagement policy
 - Dishonesty
 - Health, safety and security
 - Bank properties
 - Reporting of violations

- Corrective measures for unacceptable behavior or failure to comply with our rules, policies, and procedures on:
 - Financial Consumer Protection (FCP)
 - Anti-Money Laundering/Combating Financing of Terrorism
 - Information Security
 - Data Privacy
 - Sexual harassment, bullying, and the Safe Spaces Act
 - Negligence
 - Performance Management
- Schedule of penalties for committed violation; the effects of involvement in an administrative investigation to the employee; prescriptive effects of penalties; and prescription of offenses.

In addition, the Bank has also instituted its **Treasury Group's Code of Conduct & Ethical Standards** to ensure that the Bank's treasury activities are conducted with a high degree of integrity and are compliant with market conduct rules and relevant requirements of regulatory bodies.