



ANTI-CORRUPTION PROGRAM

Anti-Corruption Policy

The Company's Anti-Corruption Policy is embodied in the following policies.

Code of Business Conduct and Ethics. This sets forth the Company's business principles and values which shall guide and govern all business relationships of the Company, its directors, officers and employees, including their commitment on compliance with applicable laws on anti-corruption.

Policy on PLDT's Gift-Giving Activities. This provides specific guidance on compliance with applicable anti-corruption laws, particularly with respect to the giving of gifts to government officers/officials or to business partners and other private non-governmental entities, for or on behalf of PLDT. As the guiding principles for PLDT's gift-giving activities, it provides that such activities must comply with applicable laws and Company policies, and the gifts policies of intended recipient should be respected. It gives guidance by distinguishing prohibited gifts, or gifts prohibited by law, from regulated gifts which refer to gifts which if offered or given under certain conditions and requirements are not prohibited by law. The policy establishes internal controls and appropriate safeguards such as defined approval requirements, proper recording in the Company's books, and monitoring.

Corporate Governance Guidelines for Suppliers. This provides the standards of corporate governance expected from suppliers, including their compliance with all applicable laws, the prohibition against the giving of bribes, and the accurate documentation of business transactions with the Company.

Related Policies

Policy on Gifts, Entertainment and Sponsored Travel. This provides guidance on the handling and acceptance of gifts offered or given to the Company, its directors, employees and consultants by entities with existing or intended business dealings with the Company. It prohibits, among others, the direct or indirect solicitation or acceptance of bribes.

Supplier/Contractor Relations Policy. This provides the standards that shall be observed in business relationships with suppliers. It includes, among others, the prohibition to solicit, accept, offer or provide any bribe and the requirement that all business transactions of the Company with suppliers must be documented and reflected accurately and fairly in the accounts of the Company.

Expanded Whistleblowing Policy. This provides for the confidential and anonymous reporting of violations of Company policies, including violations of applicable anti-corruption laws.

Compliance Controls & Monitoring

The Company has established internal controls aimed at ensuring compliance with applicable anti-corruption laws.

- SOX 404 Internal Controls; Accounting & Auditing Controls
- Guidelines in Handling Request for Donation which provides the review and approval process for donations to ensure compliance and transparency
- Gifts Policy and Policy on PLDT's Gift-Giving Activities
- Third Party Due Diligence
 - Vendor management, accreditation and performance review
 - Corporate Governance Guidelines for Suppliers
 - Anti-corruption and corporate governance provisions in procurement contracts
 - Suppliers' briefings on relevant Company policies

Training and Communication

Compliance with applicable anti-corruption laws and Company policies is an important aspect of the Company's continuing education program on corporate governance and business ethics. It is covered in the following training sessions and communication initiatives.

- Annual Corporate Governance Enhancement Sessions for Directors and Officers
- New Employee Orientation Training Program
- Corporate Governance Trainings (face-to-face, e-Learning) and Refresher Workshops
- Advisories and updates, newsletters, news briefs, posters, videos and other publications on corporate governance and business ethics

Enforcement

The Company's Expanded Whistleblowing Policy encourages and enables the disclosure of any violation of corporate governance rules or policies, questionable accounting or auditing matters, and offenses defined in the Company's Personnel Manual, which include violations of applicable anti-corruption laws and Company policies. The policy safeguards the confidentiality of whistleblower complaints, allows anonymous reporting and protects whistleblowers and witnesses from retaliation. The policy also provides the procedures for the handling, investigation and processing of whistleblowing complaints and the enforcement of penalties.

Violations of applicable anti-corruption laws and Company policies are subject to the penalty of dismissal and such other penalties provided under relevant laws and policies.