

ANTI-CORRUPTION POLICY AND PROGRAMS

Chemical Industries of the Phils., Inc. (the “Company”) believes that corruption is unethical, unacceptable and inconsistent with its founding principles. We are committed to maintaining the highest possible ethical standards and complying with all applicable laws.

As provided in the Manual of Corporate Governance, it is the duty of the Board of Directors of the Company to set the tone and make a stand against corrupt practices by adopting an anti-corruption policy and program in its Code of Conduct and to disseminate the policy and program to employees across the organization through trainings to embed them in the Company’s culture.

The adoption of an anti-corruption policy and programs endeavors to mitigate corrupt practices such as, but not limited to, bribery, fraud, extortion, collusion, conflict of interest and money laundering. This will also encourage employees to report corrupt practices and outlines procedures on how to combat, resist and stop these corrupt practices.

The Company’s Anti-Corruption policy is embodied in the following policies:

- The Code of Conduct, Organizational Discipline and Ethics (CCODE)
- Policy on Gift-giving Activities
- Guidelines for Suppliers/Contractors
- Whistleblowing Policy

Anti-Corruption Activities and Programs

The Company’s Anti-Corruption Policy is supported by activities that strengthen corporate governance standards and ensure proper use of Company’s properties and funds. This Policy is interconnected with the Company’s overall ethics and compliance programs.

1. The Company strictly observes the giving and receiving of gifts from suppliers, government officials above the nominal and not in appropriate occasion.
2. The Company conducts re-orientation of employees on the Company policies, rules, regulations and procedures.
3. The Company sets guidelines on mitigating the risk of anti-corruption activities:
 - a. Prohibition of facilitation of payments;
 - b. Misuse of legitimate business activities to disguise a bribe or as trading influence;
 - c. Setting thresholds to charitable contributions, sponsorships and the likes and establishes approval procedures; and

- d. Monitoring of compliance and reporting any act of anti-corruption through the Whistleblowing channel.