



THE PHINMA CODE OF CONDUCT

We, The PHINMA Group, firmly believe that our commitment to ethical business practices, good corporate governance and social responsibility is vital and integral to the pursuit of our Mission to help build our Nation through competitive and well-managed business enterprises that enable Filipinos to attain a better quality of life .

The **PHINMA Code of Conduct (the “PHINMA Code”)**, founded upon the PHINMA Core Values of integrity, patriotism, competence and professionalism, embodies this unwavering commitment and reinforces our steadfast resolve to mutually serve the aspirations of shareholders and the needs of society. This Code also sets forth to guide and govern the entire PHINMA Group, our subsidiaries and controlled affiliates, together with our employees, officers and directors, in making decisions and taking actions that align with the PHINMA Core Values.

The PHINMA Code is not meant to cover all possible situations that may occur or to provide definitive answers to all questions that may arise in the performance of our duties and responsibilities. Everyone concerned should seek guidance when they are in doubt about the proper course of action in a given situation. Ultimately, everyone is enjoined to exercise sound judgment and to adhere to the letter and spirit behind this Code in their relationships among themselves, with our customers, suppliers, business partners, competitors, government, regulators, creditors, stockholders and the general public.