

## ANTI-CORRUPTION PROGRAMS AND PROCEDURES

The Company adopts a zero tolerance policy towards bribery and corruption.

Thus, all directors, officers and employees of the Corporation are obliged to strictly observe the following guidelines:

1. Directors, officers and employees shall not offer, promise or give bribes to obtain, retain or "facilitate" business or any transactions of the Corporation;
2. Directors, officers and employees shall not request, agree to accept or take bribes from any person or organization.

The foregoing applies even if made through another person.

The Anti-Bribery and Anti-Corruption Policy must be strictly observed in all transactions and dealings of the directors, officers and employees of PhilLife with the customers, suppliers and business partners as well as with the government.

Among the other guidelines on anti-corruption, the Company sets guidelines for dealing with business gifts and gratuities to protect the integrity of its employees and its business interests.