



TITLE I: CODE OF BUSINESS CONDUCT AND ETHICS

ARTICLE I

PURPOSE

This Code is intended to deter wrongdoing and to promote:

- (i) honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships.
- (ii) full, fair, accurate, timely, and understandable disclosure in reports and documents that SAPCO Philippines (hereinafter referred to as “the company” or “company” or “SAPCO”) owns and produced in other public communications made by SAPCO Philippines.
- (iii) compliance with applicable laws, rules, and regulations.
- (iv) prompt internal reporting of violations of the Code.
- (v) accountability for adherence to the Code.