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1. Introduction

House of Investments, Inc. is committed to doing business in accordance with the highest standards of professional, ethical, honest manner and in full compliance with all applicable laws, rules and regulations.

House of Investments, Inc. has zero-tolerance approach to bribery and corrupt activities. The Corporation strictly forbids any form of bribery and corruption within the Company including our dealing with our clients, business partners, service providers, government agencies, instrumentalities and all other stakeholders. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the country we operate.


2. Purpose

- 2.1. To establish controls to ensure compliance with all applicable anti-bribery and corruption regulations.
- 2.2. To establish policies to avoid bribery and corruption in business dealings and to avoid the misuse of the company's funds.
- 2.3. To have a clear definition of bribery and corruption and factors and/or situations that can determine its identification.
- 2.4. To prevent bribery and corruption by having adequate procedures to monitor and identify where and when it may occur.
- 2.5. To provide information on procedures that companies can put in place to reduce the risk of bribery being carried out for or on their behalf.
- 2.6. To communicate the company's values, philosophy and ethos on the issue of bribery and corruption and how to act in case of doubt and/or situations that may represent a conflict of interest.

3. Scope and Limitation

- 3.1. This policy shall cover all directors, officers and employees (e.g., probationary, regular, fixed term, project-hire, contractual) including Third party service providers, consultants, and other relevant stakeholders working for and on behalf of the Company.

Please refer to Annex A: List of covered companies

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- 3.2. This policy shall not cover the detailed procedures on the sanctions to be given to an employee, (which also include those who are working with Third parties and other relevant stakeholders) Third parties, and other relevant stakeholders who committed bribery and corruption.


Please refer to [HR Policy Manual A-1: Administrative Cases and Grievance Procedure](#)
Reference: [HI-IT-2 Code of Ethics for Suppliers](#)

- 3.3. This policy document is in consonance with the HI Whistleblowing Policy.

4. Definition of Terms

Term	Definition
Bribe	It is a favor, money, or anything of value that is given or promised to a person in position to influence his/her judgement or conduct.
Bribery	It is an act of offering, giving, receiving, or soliciting, directly or indirectly, anything of value to influence improperly the actions of another party.
Corruption	It is defined as the behavior of the individuals that aims to secure an advantage, either monetary and/or non-monetary, through illegal dealings or any benefit at the expense of others. Also, it is an act of dishonest behavior by those in positions of power.
Employee	It is an individual that is hired to work for a person or a company that pays them a wage or salary in return. For the purposes of this policy, employees under House of Investments, Inc. (and its Business Units) shall be identified as per section 3.1 of this Policy.
Gift	Includes any article of value, money (checks, check vouchers, gift checks or e-money, etc.), favor, gratuitous service (transportation, entertainment, hotel accommodation), and may include discounts that usually benefit the given person.
Value	It refers to the monetary worth of an item.
Perishable Gift	It is a type of gift that can decay or spoil in a short span of time. Examples of Perishable Gifts are food, drinks, vegetables, flowers and fruits.
Third Party	It is the terminology used to identify the company's Business Partners, Suppliers, Service Providers, Contractors and other stakeholders of the company.
Government Official (Appointed/ Elected)	Is an individual who holds a position within a government organization or agency, chosen by appointment or election, to represent either the government or its people.
Political Candidate	Is an individual who seeks election or appointment to a public office.

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5. Roles, Responsibilities and Authorities

Role	Responsibility
Head - Legal and Compliance	Acts as an investigating authority, for purposes of observance of due process, in cases where an employee is involved in bribery and corruption.
Head - Human Resource	Impose sanctions to an erring employee if found guilty of bribery and/or corruption in accordance with the provisions stated at HI's Code of Conduct and Discipline.
Employee/Informant/ Whistleblower	Informs the company's identified authorities if there is a suspected or an actual occurrence of bribery and/or corruption in a particular department's daily operations.

6. Implementing Guidelines

6.1. General Policies

- 6.1.1. Employees of all business units under HI group shall maintain honesty, integrity, and transparency to prevent bribery and corruption in their daily operations with private or public entities.
- 6.1.2. The company shall strictly prohibit giving to, soliciting or accepting gifts, contributions, or monetary benefits, whether directly or indirectly, to or from Third parties, government officials or political candidates, including their agents or representatives, to prevent conflict of interest or undue influence that could damage the company's reputation or provide improper business advantages. This policy shall extend to all forms of gifts, including cash, checks, vouchers, gift cards, or e-money platforms, regardless of the amount, when there are business dealings involved with the Third party.


Refer to Annex B - YGC Code of Ethics: Conflict of Interest

- 6.1.3. Any situations in which other employees are aware of such acceptance must be reported to HI-HR Admin.

Please refer to Procedures for handling of Whistleblower as extracted from HI-AD-11: Whistle Blower Policy

6.2. No Gift Policy

- 6.2.1. All directors, officers, employees, and consultants of the Company shall NOT SOLICIT OR ACCEPT, directly or indirectly, any gift from a person, groups, associations, or juridical entities from public or private sectors, local or foreign, at any time, on or off the work

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premises, in the course of their official duties or in connection with any transaction which may be affected by the functions of their office.

6.2.2. Exclusions:


- a) Tokens of appreciation offered to or received by directors, officers, employees, and consultants of the Company from Third Parties in connection with such directors, officers, employees, and consultant's acceptance of an invitation or actual participation as speaker or reactors in conferences or seminars sponsored or organized by such Third Parties may be kept by the recipient; Provided, that the other speakers, and/or reactors are also given similar tokens of appreciation by relevant Third Parties;
- b) The directors, officers, employees, and consultants of the Company may give to and/or receive from their fellow directors, officers, employees, and consultants any emergency contribution or assistance of reasonable value in the event of illness, death, emergency and other similar situations as part of the Company's tradition to help those who are in need;
- c) Perishable gifts in small quantities may be kept by the recipient. However, perishable goods in big quantities good enough for sharing shall be distributed to the employees for consumption;
- d) Gifts below PHP 2,000.00*;

***This amount supersedes the amount indicated at the C-1 HI-HR Policy Manual (Code of Conduct)**

- e) Gifts with the company logo for promotion or any promotional items.
- f) Occasional gifts that are given during the recognized Philippine holidays and other occasions (e.g., company anniversary and employee's birthday) provided that it is only for goodwill and no pending deal or transaction exists between both the HI BU and the supplier/service provider/contractor/business partner. This also follows the monetary limit as prescribed in subsection 6.2.2;

Please refer to YGC Code of Conduct and Ethics

- g) Transportation, Entertainment and others (e.g., hotel accommodation, raffle winnings) may be accepted by the directors, officers, employees, and consultants of the Company solely for goodwill purposes and shall not influence the decision on any deal or transaction and only under the following instances:

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i. Third-Party entity's corporate events invitation;

In such circumstance, the employee shall seek approval from the management by accomplishing the Employee Timekeeping/Leave Application Form and the activity shall be under "Official Business" category;

ii. Meal invitations

iii. Raffle winnings

Those pertaining to raffle winnings or other promotional items wherein participants are given equal opportunity to win prizes.

6.2.3. Employees shall determine the value of the gift received. In the event that the item/s is/are more than PHP 2,000.00, it shall be surrendered to the HI-HR Admin Staff and shall be raffled-off to the employees during the company Christmas Party or other corporate events.

6.2.4. HI-HR Admin shall maintain a logbook and the disposition of surrendered gifts.

6.3. Giving of Gifts to Third Parties


6.3.1. All covered companies shall observe that the purpose of giving gifts to Third-parties is to build working relationships and camaraderie for the success of its partnerships and not for soliciting prioritization or favors in providing service and/or completion of a business deal.

6.3.2. Gifts that will be given by the HI Group to Third-parties on official company events and other special occasions (e.g., company anniversary of the Third-party entity, wedding of the Third-party entity's owner) shall be approved by the employee's Division Head. The expenses incurred for the purchase of such gifts (through Cash Advance or Reimbursement) shall be declared by the employee at the Expense Report of the ORACLE Fusion Expense Module.

[Please refer to GEN-OF-02-015 Oracle Fusion Cloud Expenses Policy](#)

6.3.3. For gifts given by an employee to Third-parties from his or her personal expense, it shall be limited only as an appreciation of goodwill.

[HI-AD-11: Whistle Blower and Receiving of Gifts Policy \(Objectives\)](#)

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6.4. Penalties and Sanctions

- 6.4.1. In case of violation of this policy, the HI Management shall convene the Committee on Decorum and Investigation (CoDI) in accordance with the Policy on Administrative Cases and Grievance Procedure

Please refer to HR Policy Manual A-1: Administrative Cases and Grievance Procedure

- 6.4.2. Corresponding sanctions shall be given in accordance with the Code of Discipline of the covered companies in incidents of bribery and corruption provided due process and proper investigation are observed.

6.5. Compliance Procedures

- 6.5.1. Managers and supervisors shall be responsible for ensuring that all their staff are aware of this policy and that it is implemented consistently. In the review of any violation of this policy, managers and supervisors may be held liable for failure to disseminate the information in regard to the Policies on Anti-Bribery and Anti-Corruption and ensure understanding by their subordinates or for failure to detect noncompliance with applicable policies and legal requirements, where reasonable diligence would have led to the discovery of any violations or problems and prevent loss for the company.
- 6.5.2. All questions regarding this Policy should be directed to the HI-Legal and Compliance Department.


Please refer to Procedures for handling of Whistleblower as extracted from HI-AD-11: Whistle Blower and Receiving of Gifts Policy

6.6. Training

- 6.6.1. The HI-Legal and Compliance Department shall conduct orientation to all new officers, employees, and consultants on anti-bribery and anti-corruption immediately upon joining the company. Periodic anti-bribery and anti-corruption compliance training programs and/or webinars shall be conducted by the said department to re-orient the existing employees. All Employees shall participate in such training and/or webinar and HR must retain attendance records in the individual's 201 file establishing compliance with this requirement.

6.7. Approval, Amendment or Alteration of Policy

- 6.7.1. This Policy Document has been approved and adopted by the HI Board of Directors. The HI-Legal and Compliance Department, Management and HI Board of Directors shall have

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the overall responsibility to provide oversight on implementation, monitoring and periodic review (at least every 3 years) of this Policy Document.

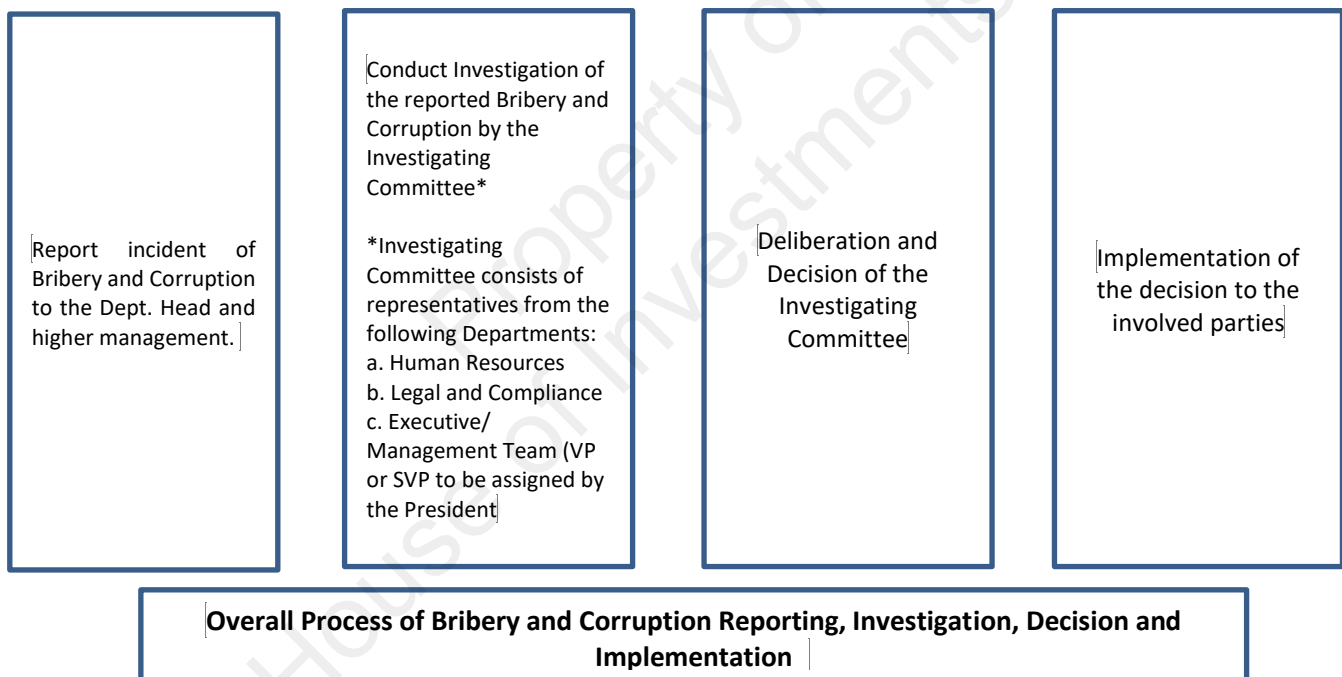
6.7.2. This Policy Document shall not be amended, altered or varied unless such amendment, alteration or variation shall have been approved by resolutions of the Board of Directors.

6.8. Effectivity Clause


6.8.1. This Policy Document shall be effective immediately upon approval.

7. Business Process Framework

7.1. Overall Process of Bribery and Corruption Reporting, Investigation and Disposition




***Source: HI-AD-11: Whistleblowing Policy (Issued on November 9, 2011)**

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8. References and Attachments

- 8.1. Annex A - List of covered companies
- 8.2. HR Policy Manual A-1: Administrative Cases and Grievance Procedure
- 8.3. HI-IT-2 Code of Ethics for Suppliers
- 8.4. Annex B - YGC Code of Conduct and Ethics: Conflict of Interest
- 8.5. GEN-OF-02-015 Oracle Fusion Cloud Expenses Policy
- 8.6. C-1 HI-HR Policy Manual (Code of Conduct)
- 8.7. YGC Code of Conduct and Ethics
- 8.8. HI-AD-11: Whistle Blower and Receiving of Gifts Policy
- 8.9. HR Policy Manual A-1: Administrative Cases and Grievance Procedure
- 8.10. Annex C: Proposed Disclosure Statement Format for Policies on Anti-Bribery and Anti-Corruption

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ANNEX A: List of Covered Companies

1. House of Investments, Inc. (HI) and its divisions
2. Landev Corporation and subsidiaries
3. Security Agencies (Greyhounds, Blackhounds, Bluehounds)
4. Investment Managers, Inc. (IMI)
5. iPeople, inc.
6. San Lorenzo Ruiz Investment Holdings and Services, Inc. (SLR)
7. HI Cars, Inc.
8. RCBC Realty Corporation (RRC)
9. A.T. Yuchengco Centre, Inc. (ATYC)
10. Tarlac Terra Ventures, Inc. (TTVI)

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Annex B – YGC Code of Conduct and Ethics

B. Special Payments

Employees are expected to exercise utmost prudence during business dealings when payments over and above the ordinary must be made in connection with certain actions and procedures.

In case of uncertainty, we must seek guidance from our respective Line Heads, Human Resources, or Legal.

C. Money Laundering

Money laundering is a crime whereby the proceeds of an unlawful activity are transacted, thereby making them appear to have originated from legitimate sources.

MONEY LAUNDERING IS COMMITTED BY THE FOLLOWING:

- Any person knowing that any monetary instrument or property represents, involves, or relates to, the proceeds of any unlawful activity, transacts or attempts to transact said monetary instrument or property.
- Any person knowing that any monetary instrument or property involves the proceeds of any unlawful activity, performs or fails to perform any act as a result of which he facilitates the offense of money laundering referred to in first paragraph above.
- Any person knowing that any monetary instrument or property is required under this Act to be disclosed and filed with the Anti-Money Laundering Council (AMLC), fails to do so.

Please note that while covered institutions are limited to banks, securities dealers, brokers, salesmen, investment houses (or those performing similar functions), and insurance companies, the crime may be committed by individuals who facilitated the transaction, whether knowingly or out of failure to take preventive measures (see sidebar.)




Conflicts of Interest

In any business dealing, Employees should always remember that one's loyalty should primarily be to YGC. This includes situations when recommendations are made to Management.

Where possible conflict of interest exists, it is our duty to immediately disclose this to our Line Head or Human Resources, whether or not a potential loss or disadvantage to the Company is foreseen. The facts in each situation will determine whether the interest in question is such as to bring it within the area of potential conflict. As a guide, the following illustrates situations where possible conflict of interest may exist.

A possible conflict of interest exists whenever one's personal interests, activities or affairs may adversely affect or influence his/her decision in the performance of his/her duties or obligation to the Company.

The simplest question to ask oneself is this: "Will my ties to a friend or family member, or to another company outside of YGC, affect the decisions I make for the company that is my employer?"

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A. Family and Personal Relationships

Possible conflict of interest exists when an Employee:

- Has an immediate family member (spouse, child or parent) and/or a relative by birth or marriage within the 4th civil degree (sibling, uncle/aunt, grandparent, cousin) who is assigned to the same unit or in the same reporting line as the Employee. The Company reserves the right to reassign Employees in case this occurs while already employed (e.g., marriage between co-employees).
- Has an interest in an entity that is a business competitor or has dealings (whether as client, supplier, contractor, etc.) with the Company. Take note that the definition of "interest" is very broad and could include anything from significant stockholdings or the employment of an immediate family member.


A conflict of interest is not likely to exist where the interest consists of shares of stocks, bonds or other securities in a publicly listed company and the amount of such interest is less than five percent (5%) of the value of the class of such securities.

- Is a party to transaction with the Company where the transaction is other than routine or customary (as in purchase or lease of property or disposal of surplus stock) unless expressly allowed by Management.
- Utilizes Company facilities or client contacts for any purpose other than the business interest of the Company and/or another YGC member-company.
- Is involved in any business transaction, engagement or arrangement for personal profit with the Company or with any entity that is client, supplier, customer, contractor, etc. or a business competitor of the Company or any YGC member-company.

Please take note that an Employee can find himself in the conflict-of-interest situation even if the party involved is not himself, but rather a relative or a close friend in any situation similar to those mentioned above. It is best that the Employee disclose all possible conflicts of interest that s/he has knowledge of.

Employees shall be allowed membership in government, quasi-governmental, legislative and judicial bodies, including boards, councils or committees of professional, trade and other associations where this is performed pursuant to public service provided the following conditions are met:

- Membership does not conflict with the interest of the Company or any YGC member-company;
- Membership will result to some benefits and give prestige to the Company; and
- Time spent in membership activities must not significantly interfere with duties in the Company.

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B. Outside Work

A possible conflict of interest situation exists when an Employee directly or indirectly serves as director, officer, employee, consultant or agent of an entity that is a business competitor of the Company, or has dealings with the Company as client, supplier or contractor.

Similarly, when Employee engages in a separate trade or business for oneself or performs work or services for another entity, regardless of its nature, Employee is prevented from dedicating his/her full time and effort to his/her job/s with the Company. Thus, this may present a conflict of interest.

To avoid any doubt, all Employees shall fully devote their office time to their assigned responsibility and shall not accept or engage in any other outside work without the express written approval of Management.

C. Gifts, Entertainment and Favors

Employees should exercise caution in giving or accepting gifts, entertainment or other personal benefits or privilege in any form, since these may result in a conflict of interest (or the appearance of a conflict of interest) in the performance of employment duties.

Even when the situation results in a perceived (not necessarily actual) conflict of interest, Employees would do well to avoid the same.

However, this does not preclude giving or receiving gifts or entertainment which are customary and proper under the circumstances (such as birthdays, Christmas, and other traditional gift-giving occasions), provided that no obligation could be, or perceived to be, expected in connection with the gifts or entertainment.


While the value of an expensive gift may suggest improper influence, please note that even gifts of lesser value are not necessarily free from such perception.

A gift includes any article of value, money, gratuitous service and may include loans or discounts.



In determining if a specific gift or entertainment lies within acceptable business practices, ask yourself:

- *Is it legal?*
- *Is it clearly business-related?*
- *Is it moderate, reasonable and in good taste?*
- *Would public disclosure embarrass my employer?*
- *Is there any pressure to reciprocate or grant special favors?*

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ANNEX C: Proposed Disclosure Statement Format for Policies on Anti-Bribery and Anti-Corruption

DISCLOSURE STATEMENT

I, <Employee Name>, of <Name of Business Unit under HI>, by affixing my signature below, do hereby agree with the provisions stated at the Policies on Anti-Bribery and Anti-Corruption.

That I shall be bound with the provisions stated at the Policy, confirming that:

1. The provisions stated at the Policy Document is true without exception: _____
2. The provisions stated at the Policy Document is true, except for the situations described in full detail on the reverse side of this statement, or in accompanying: _____

That I understand that if there are any circumstances which will make the contents of the Policy Document incorrect, a comprehensive report shall be made to describe the identified changes. Moreover, if there any instances in which a particular circumstance/s are inconsistent with the contents of the Policy Document, I will report to the management which covers the Policy Document such changes.

Employee's Name and Signature

Date