



STRONGHOLD

INSURANCE COMPANY, INCORPORATED

ANTI-BRIBERY AND CORRUPTION POLICY

Foreword:

A common tradition of the Filipinos in order to establish a good business relationship is through the means of gift-giving. However, there are specific gift-giving activities that the Company has to regulate and, if need be, prohibit in order to be attuned with its Mission and Vision.

Objective:

This Policy hereby establishes the guidelines as well as limitations of the gift-giving activities of the Company, its directors, officers and employees in order that it may not be construed as a form of bribery and/or corruption.

Scope:

This Policy covers the directors, officers, and employees of the Company and apply to corporate gifts being given to government institutions, its officers and employees as well as private third parties to include their respective directors, officers, employees and/or consultants. Gifts given for reasons of affinity and consanguinity within the sixth degree are not covered by this policy.

Guidelines:

1. Bribery and/or corruption is perpetrated by offering or receiving an undue reward by, or to, any government office, officer or employee or to any director, officer or employee of a private entity with which the Company has potential or current business transactions, designed to influence him in the exercise of his duty, or to persuade him to act contrary to law or to generally established standards of fairness, integrity and honesty, or to obtain any improper business advantage.
2. Acts defined under laws, circulars, implementing rules and regulations that constitute bribery and/or corruption are also covered by this Policy.
3. The offering or giving of gifts, including financial assistance, is allowed provided it is part of the Corporate Social Responsibility program of the Company
4. The gift must not exceed the nominal value and the approval of the President and General Manager or Department Heads must first be secured.
5. Corporate giveaways to be given during special occasions shall be allowed provided that the Company must take into account the policies on gifts of the receiver.