

---

## **ANTI-BRIBERY AND CORRUPTION POLICY**

ASFII expects its employees to demonstrate honesty, integrity and fairness in all aspects of business dealing and exercise appropriate standards of professionalism and ethical conduct in all activities. Also expects the same approach in doing business from its business partners and suppliers.

ASFII and its employees will never seek, accept or give bribe, facilitation of payment, kickback or other improper payment. We also ensure that we operate with appropriate transparency in all our business dealings.

ASFII will take appropriate steps to ensure that we do not, directly or indirectly, offer, promise, give, accept or demand a bribe or other undue advantage to obtain business gain or any other improper advantage. We do not offer, nor give in to demands, to make illicit or illegal payments to agents, public officials or the employees of business partners or anybody else that we do business with. We engage and remunerate agents and other third parties only for legitimate services and adopt appropriate transparency in our approach.

ASFII promote employee awareness of, a compliance with, company policies against bribery and corruption through appropriate dissemination of our own procedures including disciplinary procedures, policies and training programs on induction. We adopt management control system that discourage bribery and corruption, and adopt financial and tax accounting and auditing practices that prevent the establishment of "off the books" secret accounts or the creation of documents which do not properly and fairly record the transactions to which they relate.

### **1. RESPONSIBILITIES**

**1.1 Management** – is responsible for overseeing the development and implantation of the Anti-Bribery and Corruption Policy to ensure its effective implementation throughout the organization to employees, contractors, agency workers and customers.

**1.2 Human Resources** – is responsible for monitoring and reviewing of induction, audit the implementation of this procedure and associated documents on a regular basis. Promoting a zero-tolerance approach to fraud, bribery, blackmail, extortion and all other corrupt business practices in the Company. Encouraging anyone having reasonably held suspicions of fraud or bribery to report them and ensuring that no employee will suffer as a result of doing so. Promoting awareness of fraud and bribery risks; requiring management to

implement a sound system of preventative and effective controls to manage these risks. Investing in the training of employees so they are aware of the risks faced by the Company. Full investigation of all breaches or suspected breaches of this policy and suspicions of dishonest behavior and ensuring perpetrators are subject to the Company's Disciplinary Procedures as well as civil and/or criminal legal action wherever appropriate.

**1.3 Department Heads** – are responsible for making all employees aware of this policy and of their responsibility to adhere to the policy at all times. Including in agreements with third parties, in connection with significant contracts appropriate clauses to ensure that persons acting on behalf of the Company do not engage in any illegal or improper conduct in breach of this policy. Ensuring the contractors, agents or others who act on behalf of the Company maintain similar anti-bribery policies and do not engage in any illegal or improper conduct. *Prohibiting employees or person acting on behalf of the Company to receive, offer, promise, improperly influence payment, authorize payments or contract awards, directly or indirectly, in return for anything of value. Prohibiting employees or persons acting on behalf of the Company to receive a kickback on any portion of a contract payment. Prohibiting payments including facilitation or expediting payments to others in order to secure prompt or proper performance of routine duties. Prohibiting the use of subcontracts, purchase orders or consulting agreements either as a means of channeling payments, or otherwise rewarding third parties, relatives or business associates. Prohibiting the channeling of any improper payments through an agent. Prohibiting the offering of any form of bribe, unethical inducement or payment including facilitation payments to any individual or any public or commercial organization/authority to secure or to assist in securing a Public Private Partnership contract.*

**1.4 Internal Audit Manager** – is responsible for monitoring and reviewing, in conjunction with the HR Manager, the implementation of this procedure and associated documents on a regular basis.

**1.5 All Employees** – are responsible for conducting all transactions openly with fairness and honesty and in a professional manner. Ensuring that transactions are properly and accurately recorded.

---

## **2. PROCEDURES**

### **2.1 Hospitality & Gifts**

ASFII will approve business entertainment and gift proposals only if they demonstrate a clear business objective and are appropriate for the nature of the business relationship. All directors and employees are responsible for maintaining their individual log which must be made available for audit when requested.

Before accepting or giving a gift or hospitality you should consider:

Purpose – Is there one that won't compromise you or the Company?

Appropriateness – Can you justify it within the scope of the Policy?

Conflict of interest – Be careful if attached to tendering or contract renewals.

Risks – Think what they might be for you and the Company?

### **2.2 Charitable Donations**

ASFII supports number of charities and all donations must be pre-approved by the CEO or the head of the Plant. ASFII may also support fundraising events involving employees.

### **2.3 Reporting Suspected Bribery**

All employees are encouraged to report any concerns. Typical issues that should be reported may include, but are not limited to any suspected or actual attempts at bribery; Concerns that other employees or associated persons may be being bribed.

### **2.4 Action by the Company**

ASFII will fully investigate any instances of alleged or suspected bribery. Employees suspected of bribery may be suspended from their duties while the investigation is being carried out. The Company's Disciplinary Procedure will be invoked where any employee is suspected of bribery and proven allegations may result in a finding of gross misconduct and therefore dismissal. ASFII may terminate the contracts of any associated persons, including consultants or other workers who act for, or on behalf of, the Company who are found to have breached this policy.

---

## **2.5 Communication**

The Company will communicate its anti-bribery & corruption measures to all employees, suppliers and contractors.

This policy takes effect 01 March 2019.

### **ATTY. MA. KRISTINA P. AMBROCIO**

Head for Legal Counsel  
OIC for Human Resources