



Policies on Business Conduct and Ethics

- **Policy on money matters**

The Company observes a strict policy on money matters. Any misuse or misappropriation in the use of the Company's funds shall be immediately subject to dismissal, without prejudice to any civil or criminal action that the Company may choose to institute.

- **Conflicts of Interest**

Directors, senior management, or employees are required to refrain from engaging in any activity which will interfere with or run in conflict with their work or jeopardize the interest of the Corporation.

If in case, an actual or potential conflict of interest may arise on the part of a director, senior management, or employee, they should immediately disclose the matter.

- **General Conduct of Business and Dealings**

At all times, a director should act in the best interest of the Corporation, and observe transparency, accountability and fairness. Management must operate the Corporation, and employees must work in a sound, fair and prudent manner.

Confidentiality

No director or employee shall, without authority, release any data or information of confidential nature concerning the Corporation, or use such information to his/ her personal advantage and not to the best interest of the Company.

- **Gifts**

Directors, senior management, or employees should not accept commissions, advances (other than from financial institutions), materials, services, unless such was done in good faith and at arm's length. They are prohibited from accepting any gift (whether in cash or in kind) from any person or entity doing or seeking to do business with the Corporation, in exchange for any favor, promise or reward.

- **Company Funds and Assets**

No undisclosed, unrecorded or secret fund or asset shall be established or maintained for any purpose. All assets and liabilities shall be properly recorded in the regular books of the Corporation and be made subject to regular checking and audit.



Apollo Global Capital

- **Compliance with Laws and Regulations**

Directors, management and employees have a working knowledge of the statutory requirements that affect the Corporation, including its Articles of Incorporation and By-Laws and the relevant rules and regulations.