X AyalaLand LOGISTICS HOLDINGS CORP.

BUSINESS GIFTS AND GRATUITIES POLICY

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1. COVERAGE

All personnel

2. STATEMENT OF POLICY

The Company recognizes the Filipino culture of giving and accepting gifts as part of its way to express gratitude to other persons. However, the value of such a gift should be within reasonable limits of propriety.

Gifts offered to an employee by clients or supplier and the like due to their position in the Company should be received in the name of the Company duly acknowledged with gratitude.

3. POLICY PROVISIONS

In connection with an employee's affiliation or position with AyalaLand Logistics Holdings Corp. (ALLHC), he or she may receive gifts or invitations to luncheons or dinners from clients or suppliers.

- 3.1 In general, ALLHC employees may accept a gift or invitation if:
 - It is unsolicited
 - It does not violate any laws
 - It does not discredit ALLHC
 - It is directly attributable to personal or familial relationships
 - It is promotional items or token or nominal value made available under the client's or supplier's customer or public relations program
 - It is part of business meetings or discussions e.g., invitation to lunch or dinner by Company clients or suppliers
 - It is not given to influence judgment.
- 3.2 The gift should be inexpensive. In monetary terms, the value of such a gift should not be more than Php2,000.00. The amount of substantial value shall be defined by management and reviewed periodically. Such substantial value shall be applicable once per giver per year.

Otherwise, if the gift is more than the defined reasonable limits of propriety, and meets all the conditions stated in 3.1 above, then the employee should accept it with gratitude on behalf of the Company and turn it over to the Human Resources for proper disposition.

3.3 Employees are not allowed on any occasion to receive cash or gift certificates from business partners.

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- 3.4 Under no circumstances should employees accept, directly or indirectly, payments, loans, kickbacks, special privileges, favors or services from anyone.
- 3.5 It is unacceptable and contrary to ALLHC's policies to offer money, favors, inappropriate gifts or promises of gifts or anything else of unusual value to influence, direct, obtain or retain business in ALLHC's favor. Such payments or favors may be considered bribery which violates Company policy as well as existing laws. It is equally unacceptable for any employee to take bribes in any form.

4. ADMINISTRATION

All employees, especially those who transact business with other firms and customers, are responsible for the strict observance of this policy.

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