



**FUBON INSURANCE BROKER (PHILS.)
CORPORATION**

CODE OF CONDUCT

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Purpose of and Basis for Adoption

These guidelines have been established to encourage people in positions of authority at Fubon Insurance Broker (Philippines) Corporation to act in line with ethical standards and enable the companies' stakeholders to better understand their ethical standards.

Definition of People in Positions of Authority

The term "people in positions of authority" as used in these guidelines refers to Fubon Insurance Broker's board of directors and supervisors; presidents, vice presidents or their equivalents; and executives in financial and accounting departments. It also refers to other persons with managerial authority and the power to sign documents on the companies' behalf.

Preventing Conflicts of Interest

People in positions with authority should handle company business objectively and efficiently, and they shall not take advantage of their positions to obtain improper benefits for themselves or their spouses, parents, children, or relatives up to a second degree of kinship.

They shall also establish a policy aimed at preventing conflicts of interest and provide appropriate channels through which people with authority can explain voluntarily whether they have any potential conflicts of interest with their company.

Avoiding Opportunities to Pursue Personal Gain

Fubon Insurance Broker (Philippines) Corporation shall keep people in positions of authority from pursuing the following actions:

- Using company assets or information or taking advantage of their own position to seek opportunities to pursue or obtain personal gain.
- Competing with their company. When their company has an opportunity for profit, people with authority have the responsibility to increase the legitimate and lawful benefits that can be obtained.

Confidentiality

People in positions of authority have an obligation to maintain the confidentiality of any information on their company itself or its suppliers and customers, except when authorized or required by law to make it

public. Information that should be kept confidential includes any undisclosed information that could harm the company or its suppliers and customers if leaked or exploited by a competitor.

Fair Trade

People in positions of authority shall treat their company's suppliers, customers, competitors, and employees fairly. They shall not manipulate, hide or misuse information learned through their positions or make false statements on material events or engage in other unfair methods to influence trades and obtain improper gains.

Protecting and Properly Using Company Property

People in positions of authority are responsible for safeguarding company property and must ensure that it can be effectively and lawfully used for official business purposes.

Handling Discovery of the Possibility of a Company Suffering Substantial Damage

When people in positions of authority discover the possibility that their company might suffer substantial damage, they must handle the situation quickly and appropriately. They should report the situation to the Audit Committee board of directors, and have the company report it to regulatory authorities

Encouraging the Reporting of any Illegal or Unethical Behavior

Fubon Insurance Broker (Philippines) Corporation shall strengthen the internal promotion of ethical concepts and encourage employees to report behavior they suspect is or have discovered to be in violation of laws, regulations or this Code of Ethical Conduct to directors, supervisors, managers, internal auditing managers or other appropriate persons. To encourage employees to report illegal activity, Fubon Insurance Broker shall set up a tangible system for filing such reports and make employees aware that the organization will do everything it can to keep informants safe and protect them from reprisals.

Disciplinary Measures

If people in positions of authority violate this Code of Ethical Conduct, the company shall take disciplinary action based on the Company Act and other applicable laws and disciplinary measures stipulated in the company's internal regulations and guidelines.

If the person who has been disciplined disagrees with the decision, he or she can file an appeal within 10 days of learning of the punishment by presenting related evidence and a written statement describing in detail the reason for the appeal. The board of directors will review the appeal and make a final decision.

Disclosure Methods

Fubon Insurance Broker shall disclose this Code of Ethical Conduct on the website and in the annual reports and public statements. The same conditions apply for any amendments to the Code.