

## **Communication and Compliance with the Company's Code of Ethics**

SM Prime understands that the continuous growth and development of its corporate governance culture rests on the promotion and awareness of the principles of good governance. As such, the Company continues to strengthen its training and orientation programs. Through the Human Resource Department's (HRD) orientation program, new employees are given an overview of the various components of SM Prime's Corporate Governance Framework, the Code of Ethics and related policies which are also contained in an internal portal for employees' easy access and reference. It also covers the importance of ethics in the business, informs employees of their rights and obligations, as well as the principles and best practices in the promotion of good work ethics. Relative to this, the HRD, on an annual basis, requires all employees to re-take the 3-part Corporate Governance program. This specifically includes the following:

- Confirmation – to confirm that employees have read and understood and agree to comply with the Company's Code of Ethics, Insider Trading Policy, Conflict of Interest Policy, and Guidelines on Acceptance of Gifts and Travel Sponsored by Business Partners (Anti-Corruption Policy), among others
- Disclosure Survey - to disclose each employees' affiliations, interests, relationships, and/or transactions which are relevant for full disclosure of all actual, apparent or possible conflicts of interest
- e-Learning Courses (self-paced learning) - to be familiarized with the provisions of the Code of Ethics and other specific policies in upholding corporate governance in the workplace.

For Year 2019, the HRD has started to cascade the annual mandatory COE compliance on January 28, 2019. Attached below is the email blast of SMPH HRD.



Mon 28/01/2019 11:03 AM  
SM Prime Employee Relations  
MANDATORY COMPLIANCE: Code of Ethics

To



eLearning FAQs.png  
503 KB

Good Morning!

In pursuit of observance of corporate governance principles and guidelines as embodied in the Manual of Corporate Governance, the **Corporate Governance (CG) Portal** shall be used as a tool to strengthen the implementation across the SM Prime Group. Thus, **all employees** are required to confirm on an **annual** basis that they have read and understood the company policies, completed the e-Learning module and taken the disclosure survey on Conflict of Interest. For this year, the e-Learning and Conflict of Interest survey were modified in view of the approved *Policy on Handling of Conflict of Interest Situations*.

In order to comply, kindly complete steps 1-4 in this link <https://learn.sm.ph/course/view.php?id=394> **on or before February 28, 2019**.

- Login using your AD account
- In the Settings pane, click **Enroll me in this course**

For any **technical issues** encountered, please check the attached FAQs.

For **content related** inquiries, you may raise your concerns to SMPHI Risk Management and Governance at [riskandgovernance@smprime.com](mailto:riskandgovernance@smprime.com)

Should you wish to access and explore the Corporate Governance Portal, you may click the image below.

