

	<b>POLICY</b>	<b>Governance, Corporate Affairs and Investor Relations</b>	<b>Policy No. GOV 2017–005</b>	
			<b>Reference:</b> Code of Business Conduct and Ethics	
	<b>GIFTS / HOSPITALITY / ENTERTAINMENT</b>		<b>Effective Date as approved by BOD on</b> 07.29.2013	<b>Amended on</b> 26 October 2017 Ver. 2 Rev. 1

## 1. Objective

- 1.1. To provide guidelines on acceptance of and giving of gifts / hospitality / entertainment
- 1.2. To ensure that this does not lead to conflict of interest and improper influence of business judgement
- 1.3. To promote integrity in procurement practices and in selection of the most appropriate business partners for all Belle projects and transactions

## 2. Scope / Coverage

This policy covers all Directors, Officers and Employees.

## 3. Definition of Terms

- 3.1. Gift – anything of value such as, but not limited to, cash or cash equivalent, loans, fees, rewards, commissions, allowances, employment, travel, entertainment, sponsorship of personal events (like birthday, wedding, baptism, etc.), the use of property owned by business partners (like vehicles, beach houses, resorts, restaurants, bars, sports or recreational facilities), and special favors and privileges, whether for personal or business use.
- 3.2. Business partner – refers to clients, contractors, suppliers, banks and other entities engaged in business with the Company.
- 3.3. Nominal value – set at a maximum amount of Php2,000.00.

## 4. Policy

The Company prohibits direct/indirect solicitation of gifts, hospitality and entertainment from a business partner, by any director, officer, and employee of the Company. Belle personnel may accept corporate giveaways if the estimated value is Two Thousand Pesos (Php2,000.00) and below.

## 5. Guidelines

- 5.1. Belle personnel invited to travel for the purpose of attending trade shows, exhibits or the like, wherein products of business partners are featured, and/or for exposure to new techniques, products, and/or innovations, among similar purposes, said personnel are prohibited from accepting sponsored travel. Should the Company deem that such travel is necessary for the business and for the development and training of its personnel, Belle shall shoulder the cost.
- 5.2. In no case shall any Belle director, officer or employee accept travel and/or entertainment sponsored by any current or prospective business partner which is participating in any on-going bidding or selection process for any Belle project or transaction. Any exception from the foregoing should be authorized by the President or the Chairman.
- 5.3. Belle personnel may accept corporate give-aways, raffle prizes, tokens or promotional items of nominal value (pens, mugs, notebooks, and the like), provided that the gift is voluntarily given by a third person without suggestion or solicitation, as a souvenir or out of courtesy;

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- 5.4. And provided further, that the approximate value of the gift does not exceed Two Thousand Pesos (Php2,000.00). If the approximate value of the gift exceeds Two Thousand Pesos (Php2,000.00), it should be not be accepted, and should be immediately returned to its giver. In situations where it is deemed improper to refuse a gift, the issue shall be referred to the Governance, Corporate Affairs and Investor Relations Department (GCAIR) for proper disposition.
- 5.5. All gifts, hospitality and entertainment shall upon receipt, be registered with GCAIR Dept. The registry must contain detailed description of the gift/hospitality/entertainment, its source and the measures taken to dispose of it. (Refer to Item 6 below on Declaration Form)
- 5.6. Likewise, no Belle director, officer or employee shall perform such actions that may be considered corruption, such as the giving of gifts, hospitality and/or entertainment to any of the Company's various stakeholders.

## 6. Declaration Form

- 6.1. Declaration for gifts received shall be submitted weekly via email TO: GCAIR Dept., CC: Employee's Dept Head.
- 6.2. GCAIR Dept. shall submit a consolidated report to the President & CEO by the 7th of each following month.

Employee's Name:				Department:	
Date reported:					
<b>DECLARATION FORM FOR GIFTS / ENTERTAINMENT / HOSPITALITY</b>					
Date Received	Item/s Received	Quantity	Description	Item/s received from	Measures taken to dispose the items
mm/dd/yy	(ex. 1: Christmas basket)	1	canned goods; bottle of wine; chocolates	ABC Trading	returned to giver since estimated value exceeds P2,000
mm/dd/yy	(ex. 2: ballpen)	1	Parker brand; black ink	XYZ and Associates	the item being a Company give-away with an approximate value of P800 will be kept by the undersigned per Company policy
mm/dd/yy	(ex. 3: gift certificate)	1	overnight stay in Nobu, COD Manila	City of Dreams	won as a raffle item during the 2017 Beer Fest; immediately endorsed to the GCAIR Dept. for proper handling
I certify that the foregoing information is true and correct. I further declare that I have disclosed all the information required to comply with the Company's policy on the acceptance of gifts, entertainment and hospitality. I acknowledge that if this declaration is in any part false or incorrect, this could result in disciplinary action that can lead to the termination of my employment.					
Employee's signature					
<b>For Governance, Corporate Affairs and Investor Relations Department Only</b>					
Form Received by:				Estimated value:	
Date received:					

For questions and/or clarifications, please contact Liz Tan or Michelle Hernandez at extension 2111 and 8812, respectively, or email [governance@bellecop.com](mailto:governance@bellecop.com).