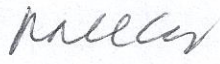

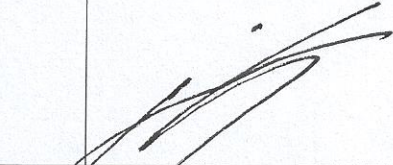

 <b>INVESTMENTS CORPORATION</b>	<b>POLICIES AND PROCEDURES</b>			
	<b>ANTI-DISCRIMINATION AND ANTI- HARASSMENT POLICY</b>			
	Document No.. GRC -001	Version No. 1.0	Effective Date January 18, 2021	Page 1 of 4

### Document Approval

Version	Name and Position	Signature	Date
1.0	Prepared by:  Noel T. Ang		
	Reviewed by:  Wellington Palmero		
	Approved by:  Frederic DyBuncio		



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	Document No.. GRC -001	Version No. 1.0	Effective Date January 18, 2021	Page 2 of 4

## 1. POLICY STATEMENTS

- 1.1 SM Investments Corporation (SMIC) promotes equal opportunity for all employees. SMIC will take affirmative measures to ensure against discrimination in employment, recruitment, advertisements for employment, compensation, termination, upgrading, promotions, and other conditions of employment against any employee or job applicant on the bases of race, creed, color, national origin, or sex.
- 1.2 SMIC is committed to provide a working environment that is safe and free from harassment (including sexual harassment) for all its employees and will not tolerate any form of behavior that is based upon an individual's sex, sexual orientation, race, ethnicity, national origin, age, religion.
- 1.3 SMIC operates in a zero tolerance policy for any form of harassment in the workplace, treat all incidents seriously and promptly investigate all allegations thereof. Any person found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment.

## 2. OBJECTIVES


- 2.1 To provide a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, including harassment.
- 2.2 To ensure that all its employees can work in an environment free from unlawful harassment, discrimination and retaliation.
- 2.3 To prohibit disparate treatment on the basis of sex, sexual orientation, ethnicity, age, social class or background or any protected characteristics with regard to terms, conditions, privileges and perquisites of employment.

## 3. COVERAGE

These policies apply to all applicants and employees, and anyone engaged in by fellow employees or by someone not directly connected to the Company (e.g., an outside vendor, consultant or customer).

Conduct prohibited by these policies is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events.



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	<b>ANTI-DISCRIMINATION AND ANTI- HARASSMENT POLICY</b>			
	Document No.. GRC -001	Version No.. 1.0	Effective Date January 18, 2021	Page 3 of 4

#### 4. DEFINITION OF TERMS

**Sexual Harassment** - is behavior of a sexual nature that is unwelcome and offensive to the person or persons it is targeted toward. Examples of harassing behavior may include unwanted physical contact, foul language of an offensive sexual nature, sexual propositions, sexual jokes or remarks, obscene gestures, or sexually explicit pictures, drawings, or caricatures. Use of the employer's computer system for the purpose of viewing, displaying, or disseminating material that is sexual in nature may also constitute harassing behavior.


**Harassment** - is verbal, written or physical conduct that denigrates or shows hostility or aversion toward an individual because of his or her race, color, religion, sex, sexual orientation, gender identity or expression, national origin, age, disability, marital status, citizenship, genetic information, or any other characteristic protected by law, or that of his or her relatives, friends or associates, and that: a) has the purpose or effect of creating an intimidating, hostile or offensive work environment, b) has the purpose or effect of unreasonably interfering with an individual's work performance, or c) otherwise adversely affects an individual's employment opportunities.

**Discrimination** - is any negative action or attitude directed toward someone because of protected characteristic like race and gender, age, religion, ethnicity / nationality.

#### 5. PROCEDURES

- 5.1 Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, including harassment. Therefore, SMIC expects that all relationships among persons in the office will be business-like and free of explicit bias, prejudice and harassment.
- 5.2 All employees, including supervisors and other management personnel, are expected and required to abide by this policy. No person will be adversely affected in employment with the Company as a result of bringing complaints of unlawful harassment.
- 5.3 Anybody who is subject to the harassment or discrimination or has knowledge of anyone being harassed, discriminated or abused shall report the incident to the Head of the Human Resource Department (HRD) or to the Compliance Officer (CO).
- 5.4 HRD Head or CO will make every reasonable effort to ensure that all complaints in violation of this policies will be investigated and resolved appropriately.
- 5.5 All complaints of harassment will be handled in a discreet and confidential manner under the circumstances.



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	Document No.. GRC -001	Version No. 1.0	Effective Date January 18, 2021	Page 4 of 4

- 5.6 SMIC prohibits retaliation against any individual who reports discrimination or harassment or participates in an investigation of such reports.
- 5.7 Any false and malicious complaints of harassment, discrimination or retaliation (as opposed to complaints that, even if erroneous, are made in good faith) may be the subject of appropriate disciplinary action.
- 5,8 Any employee who has questions or concerns about these policies may bring his/her concerns with the Head of HRD or to the CO or to his/her immediate supervisor or department head