 <b>INVESTMENTS CORPORATION</b>	<b>POLICIES AND PROCEDURES</b>			
	<b>EQUAL OPPORTUNITY POLICY</b>			
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## 1.0 OBJECTIVE

This **Equal Opportunity Policy** aims to integrate a philosophy of equal opportunity and meritocracy into the organization's culture, recruitment practices, career growth opportunities and how the company engages with all its stakeholders.

## 2.0 OUR EQUAL OPPORTUNITY PRINCIPLES

SM Investments Corporation (SMIC) envisions being an employer of choice with our commitment to provide equal employment opportunities for all applicants and employees, regardless of race, belief, social or economic status, religion, gender, national origin, or marital status.

### 1. SM's Equal Opportunity Community: Respectful of all

We uphold global standards, frameworks and practices, aligned with human and labor rights, creating opportunities for all applicants and employees without unconscious biases, alongside compliance with applicable laws and regulations.

### 2. SM Practice of Meritocracy: Fair Assessments and Recognition

We practice meritocracy in performance assessments, recognition and promotions, providing employees a career path to reach their full potential aligned with the company's goals, objectives, mission, vision, values and policies.

### 3. SM Gender Balance: Women's Empowerment for Growth


We aspire to achieve gender balance at all times, providing equal opportunities for all, regardless of gender. Whenever possible, we seek opportunities to promote women's empowerment facilitate the development of women's leadership and take steps to have appropriate women representation in all levels of leadership, including the Board.

### 4. SM Facilities: Spaces that Support Inclusivity

We take steps for our facilities to cater to the unique needs of our diverse employees – gender-neutral washrooms, room for nursing mothers, PWD access areas and non-denominational and ecumenical meditation rooms.

### 5. SM Transparency and Accountability: Integrity in Equal Opportunity Performance & Disclosures

We provide accurate, timely and balance disclosure to our stakeholders at all times.

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### 3.0 OUR COMMITMENT and INITIATIVES

With SMIC serving as lead and exemplary to the group, all business units within the SM group are expected to develop their respective sustainability principles, commitments, policies and initiatives aligned with the SM group Sustainability Principles and Commitments as stated in this policy. We are committed to periodically reviewing and updating this policy to ensure continued compliance with applicable laws and regulations, and to reflect our ongoing commitment to equal opportunity, meritocracy, diversity, and inclusivity.

#### Equal Opportunity in Governance

- **Appointment of an Officer:** Establish a designated Officer in charge of strategy development, promotion and management of equal opportunities initiatives and meritocratic culture in the company
- **Equal Opportunity Policies and Practices:** The company develops and implements an Equal Opportunity Policy and Management Systems to ensure that the Company has the appropriate processes, procedures and governance structures in place to successfully implement the organization's equal opportunity and meritocracy culture
- **Equal Opportunity Framework:** Develop an active Equal Opportunity Framework that serves as a guide for all SM businesses

#### Inclusivity in Facilities

- **Supporting Nursing Mothers:** Provide a lactation room for nursing mothers
- **PWD-Friendly Facilities:** Ensure that all facilities provide easy access and mobility for persons with disabilities
- **Gender Neutral Spaces:** Allocate gender-neutral facilities like washrooms or other related facilities
- **Respecting Multi-Faith:** Allocate multi-faith, non-denominational, ecumenical meditation rooms to give appropriate spaces for employees of all faiths to practice their faith

#### Equal Opportunity and Meritocracy in Performance Management and Disclosures


We safeguard our culture of equal opportunity and meritocracy by measuring our performance.

#### Equal Opportunity Stakeholder Engagement

- **Stakeholder Consultation:** Regularly seek feedback and consultations from our business units and employee focus groups for continuous improvement
- **Equal Opportunity Awareness:** Regularly raise awareness of how employees can support and promote an equal opportunity culture in the company at all times

### 4.0 COMPLIANCE AND REMEDIATION

Any employee found to have engaged in discrimination or harassment in violation of this Policy will be subjected to disciplinary action, up to, and, including termination of employment. Employees who

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believe they have been subjected to discrimination or harassment or have witnessed such behavior are encouraged to report this to the Human Resource Head or Chief Risk and Compliance Officer for appropriate action.

Reports by employees and other stakeholders on violations of this Policy made through the company's whistleblower mechanism shall follow the procedures and provisions outlined in the Whistleblower Policy.

This policy is part of the Sustainability Management System and is suppletory to the Anti-Discrimination and Anti-Harassment Policy and the Manual on Corporate Governance.