

POLICIES AND PROCEDURES

STAKEHOLDER ENGAGEMENT POLICY

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Document Approval

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1.0 OBJECTIVE

This **Stakeholder Engagement Policy** is part of SM's Sustainability Management System to ensure the full practice of the Sustainability Policy. It aims to provide implementing guidelines on stakeholder engagement as part of determining the Company's sustainability material issues.

2.0 OUR STAKEHOLDER ENGAGEMENT POLICY

SM Investments Corporation (SMIC) envisions to be a catalyst for responsible development in the communities it serves. To realize this, SM shall conduct regular stakeholder engagement through formal and informal avenues to understand sustainability material topics that impact them in relation to its operations.

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 Stakeholder Engagement Policy aligned to the Commitments stated in this policy.

Stakeholder Anonymity

We uphold the data privacy of all our stakeholders as we conduct formal and informal stakeholder engagement activities such as stakeholder consultation, surveys and other forms of engagement.

2. Stakeholder Equity

We provide equal representation of our different stakeholder groups whenever we do stakeholder consultations for identifying sustainability material topics or other relevant issues in sustainability.

3. Stakeholder Feedback Mechanisms

We provide adequate and easy to access stakeholder feedback mechanisms such as online surveys, stakeholder consultations, stakeholder email address (<u>sustainability@sminvestments.com</u>) and a stakeholder whistle blowing mechanism.

4. Stakeholder Communications and Disclosures

We take uphold highest integrity and accountability in stakeholder disclosures, assuring timeliness and balanced reporting averting any form of green washing or green hushing.

- Stakeholder Awareness: We provide sustainability learning opportunities for our stakeholders
 through the SM Sustainability School special modules motivating and engaging them to take
 active participation in advancing social and environmental responsibility.
- Sustainability Advocacy: Following stakeholder feedback, we do our share in advocating for national policies that advance the sustainable development agenda of the country for private sector participation.

This policy is part of the SM Sustainability Management System to ensure the full realization of the SM Sustainability Policy and shall be regularly reviewed and updated as necessary.