POLICY ON EMPLOYEES' SAFETY, HEALTH AND WELFARE

Occupational safety, health and welfare are top priority of the Company. We will strive to ensure safe working conditions, equipment and work sites. The Company promotes employee involvement and accountability in identifying, preventing and eliminating hazardous conditions and the risks of employee injury.

Safety, health and welfare in the working environment, product quality and operating efficiency are inseparable.

The Company will ensure continuous improvement in health and safety performance through close cooperation among management, employees and unions, which will contribute to the health and safety of employees and the success of the organization.

The Company is committed to:

- make employee health and safety a priority in all aspects of management practices;
- establish, communicate and enforce, with the employees' involvement, work site-specific rules and safe work methods;
- promote and develop the awareness, leadership and accountability of employees in health and safety through their involvement in continuous improvement processes;
- measure its health and safety performance in accordance with established standards, and communicate the results to the employees; and
- conduct health and safety seminars and audits to confirm that its management practices meet policy objectives, legislation and the principles of sound management.

Programs Relating to Safety, Health and Welfare of Employees

The following programs were organized and were conducted for employees' health, safety and welfare:

- 1. Safety Re-Orientation for Construction Workers, Plantation, and Mill Employees
- 2. Wellness Seminar
- 3. Basic Training Course for Pollution Control
- 4. Basic Occupational Safety and Health Seminar
- 5. Seminar on Pollution Control & Hazardous Waste Management
- 6. Employees' Re-Orientation Seminar

A health and safety program is also given to each company belonging to the Group. The safety manual contains the health and safety elements of the organization, objectives which make it possible for the company to achieve its goal in the protection of its workers at the work place. Each company has its own separate safety manual that corresponds to safety and health needs of the workers.

A Safety and Health Committee is also organized in each project and for the whole company in order to protect every working man against the dangers of injury, sickness or death through safe and healthful working conditions. The committee also assures the conservation of valuable manpower resources and the prevention of loss or damage to lives and properties.

Training and Development Programmes For Employees

The training and development program implemented by the company and its subsidiaries are identified through the Seminar/ Training Need form, which is accomplished by the department heads and through interview. The trainings and seminars are then classified based on the following criteria: Knowledge, Skills, Behavioral/Attitude and Safety & Health.

Performance-enhancing mechanisms for employee participation

Quality is important to our business because we value our customers. We strive to provide our customers with products and services which meet and even exceed their expectations.

We are committed to continuous improvement and have established a Quality Circle and Productivity Programs to improve quality:

We have the following systems and procedures in place to support us in our aim of total customer satisfaction, productivity & continuous improvement throughout our business:

- 1. Regular Quality Circle Meetings
- 2. Regular gathering and monitoring of customer feedback
- 3. A customer complaints procedure
- 4. Selection and performance monitoring of suppliers against set criteria
- 5. Training and development for our employees
- 6. Regular audit of our internal processes
- 7. Measurable quality objectives which reflect our business aims
- 8. Management reviews of audit results, customer feedback and complaints

Our internal procedures are reviewed regularly and are held in a Manual which is made available to all employees.

Though the Management has ultimate responsibility for Quality, all employees are empowered through these Quality Circle and Productivity programs mechanism to have a responsibility within their own areas of work so helping to ensure that Quality is embedded within the whole of the company.

Reward/Compensation Policy Related to Company's Performance

BONUS- The bonus of the members of the Board of Directors, the officers and employees of the corporation will be given upon the recommendation of the Compensation and Remuneration Committee and shall not exceed ten (10) per centum of the net income of the corporation (excluding the unrealized equity in the net earnings of affiliated and subsidiary corporations) before this bonus and taxes of the preceding year or preceding years if in a cumulative basis. Twenty-five (25%) per centum of the entire bonus shall be distributed to the Directors and the balance thereof shall be distributed to the Officers and Employees in such amounts and manner as may be recommended by the Compensation and Remuneration Committee and as may be approved by the Board of Directors.

A performance evaluation is given twice a year, every semester. The allowable increase given to an employee will be based on the Adjectival Rating of the direct supervisor or head. The following are the corresponding allowable increase for each adjectival rating:

Excellent- 15% Above Average- 12% Average- 10%

Anti-Corruption Programmes and Procedures

	Policy	Activities
Anti-corruption programmes	Under the Employee Code of Conduct	In order for the company to promote
and procedures?	Article III - Offenses Against Company	its corporate values to its officers and
	Interest and Policy, seeks a behaviour that	employees, the human resource
	manifests Love for Truth. This includes the	department conducts re-orientation
	practice of such virtues as honesty,	seminar for the employees discussing
	concern and loyalty towards our company	the company's vision, mission and core

which should go beyond self-interest. This hopes to instill a true spirit of service with a high sense of responsibility.

values, the employee code of conduct and manual on corporate governance. The HRD initiates the seminar on AVID I to VI with topics about Attitude, Values, Insights and Development; virtues talk every Monday during flag ceremony, and monthly talk with religious flavour.

The company also sponsors employees' who need retreat and recollection for them to have time for renewal and regeneration of spirit, mind and body, looking closely and reflect on their thoughts, feelings, beliefs, and motivations.

<u>Procedures for Handling Complaints By Employees Concerning Illegal (including Corruption) and Unethical Behavior and Protection from Retaliation</u>

The Employee Code of Conduct provides the procedures for handling complaints by employees concerning illegal and unethical behavior.

Procedure in Handling Administrative Cases

- 1. All administrative cases must be reported formally to the employee's immediate superior
- 2. The immediate superior of the reported employee will review, study and validate the report submitted to him within forty eight (48) hours.

NOTE: In checking the validity of the report submitted, the 5 Ws (Who, What, Where, When, Why) and 1 H (How) fact finding method is a proven effective guide.

- 3. After establishing the validity of the submitted report, the immediate superior must determine whether or not the case merits preventive suspension. If so, the immediate superior must issue the same. Preventive suspension must not exceed 30 working days. However, should the company decide to extend beyond 30 working days because more time is needed for investigation, extension can be made but with pay.
- 4. Immediate superior must issue a Notice to Explain (NTE) to the reported employee stating clearly the charges, purpose, reason and basis of such.
- 5. The employee must receive and submit his response to his immediate superior within the allowable time provided as stated in NTE.
- 6. Upon receipt of the employee's explanation, the immediate superior studies it and makes his recommendation to the department manager either to excuse or impose Disciplinary Action (DA) on the reported employee. The basis of his recommendation must always be in consonance with the Code and the Philippine Labor Laws.
- 7. Where the immediate superior recommends the imposition of the DA and such recommendation is approved by the department manager, the decision will be issued to the reported employee, and explained to him or her.
- 8. Where the immediate superior recommends to excuse the impositions of the DA and the same is approved by the department manager, the employee will receive a copy of the decision.
- 9. In case where the recommendation of the immediate superior is disapproved, the decision of the department manager shall prevail.
- 10. The employee, after receiving the copy of the decision approving the imposition of disciplinary action imposed upon him must review his or her stand about the matter. Should he or she feel aggrieved about the decision, he or she may appeal and elevate the matter to the Division head. The Division head may opt to consult the HRD in reviewing the case. The decision of the Division head will be final and executor. However, offenses that will impose dismissal may be appealed to the President.

Reporting of any Illegal or Unethical Behavior

Any Employee who is aware of any illegal or unethical behavior or who believes that an applicable law, rule or regulation or the Code has been violated, must promptly report the matter as follows:

- To the Chief Compliance Officer of the Company, or
- In accordance with the Company's Policy and Procedures for the Submission of Complaints Pertaining to Accounting, Internal Accounting Controls, Auditing and Other Matters (Whistleblower Protection Policy).

The Company's whistleblowing policy when in place will provide guidelines on handling employee disclosure or complaints of violation of the corporate governance rules, protects whistleblower from retaliation and ensures confidentiality and fairness in the handling of a disclosure or complaint.