	<b>Policy on Conflict of Interest</b>		<b>Document Number:</b>  2P-SS-05.19
	<b>Policies</b>		<b>Revision No</b> 1
	<b>Department:</b> Legal	<b>Effective Date:</b> January 23, 2020	

## Objective

The objective of this policy is to educate the employees of F2 Logistics Philippines, Inc. & F2 Global Logistics, Inc. the importance of awareness when a conflict of interest arises and the steps to mitigate or eliminate it.

Conflict of interest refers to a situation where an employee has conflicting loyalties between interests under his official function and those which are outside of his official functions. Usually, the interests outside the official function have the potential to give the employee direct benefit whether through himself or another person. Employees are expected to act with integrity all throughout the performance of his or her functions.

## Scope

The scope of this Policy involves all current employees of F2 Logistics Philippines, Inc. & F2 Global Logistics, Inc.


## Policies

1. As early as the recruitment process, the potential employee shall be required to declare the following:
  - a. Any family member within the third civil degree of consanguinity or affinity who is currently employed in any organization or company which is engaged in a line of business directly or indirectly in competition with F2 Logistics Philippines, Inc. & F2 Global Logistics, Inc.
  - b. Any family member within the third civil degree of consanguinity or affinity who is currently employed in F2 Logistics Philippines, Inc. & F2 Global Logistics, Inc.

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- c. Any family member within the third civil degree of consanguinity or affinity who is currently employed in a Government Agency directly regulating the affairs and operations of F2 Logistics Philippines, Inc. & F2 Global Logistics, Inc.
  - d. Any business interests or other engagements which are directly or indirectly in competition with F2 Logistics Philippines, Inc. & F2 Global Logistics, Inc. it's affiliates, and other related interests.
2. All employees shall make annual notarized and sworn disclosure statements of interests falling under paragraph no. 1 herein. If the employee does not have any conflict of interest, it shall likewise be indicated. The employee shall undertake to report to Management in a formal report or disclosure any conflict of interest within five (5) days when the conflict arises.
3. In case it is discovered that an employee has a conflict of interest which he or she failed to report. The Corporate Compliance Officer shall be notified thereof. The CCO shall then institute an investigation to determine the truthfulness and veracity of the information regarding the conflict of interest.
4. If the CCO affirms and confirms the veracity of the information regarding the conflict of interest, he shall then summon the concerned employee through a Notice to Explain (NTE), indicating the alleged conflict of interest, and requiring the employee to explain in writing why he or she failed to report or disclose said conflict of interest.
5. If the employee confirms the conflict of interest, the CCO may seek the approval of Management if they shall allow the conflict of interest. If they shall allow the conflict of interest to remain, it shall be expressly indicated in a notice to the employee. In turn, the employee shall be

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required to transfer to another employee, if possible, his specific official functions which may have conflict of interest.

6. If the Management chooses to prohibit the conflict of interest, the employee shall be made to dissociate from his personal interests. If the employee does not comply, it may be subject to disciplinary action the penalty of which may be dismissal due to damage or loss to the company.

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