	<h1>Policy against Bribery, Corruption and Fraud</h1> <h2>Policies</h2>		Document Number: 2P-LEG-16.03
	Department: Legal	Effective Date: January 22, 2020	Revision No 0

Scope

This policy shall include all employees of F2 Logistics Philippines, Inc. and F2 Global Logistics, Inc. and employees of its Third-party Service Providers.

Definition of Terms

F2 Logistics Philippines, Inc. and F2 Global Logistics, Inc. strongly condemns Bribery, Corruption, and Fraud within all aspects of its operations.

BRIBERY means giving or accepting an unearned reward to influence someone's behavior.

CORRUPTION is any unlawful or improper behavior that seeks to gain an advantage through illegal means.

FRAUD is the intentional use of false or misleading information in an attempt to illegally deprive another person or entity of money, property, or legal rights.


Ownership

The Corporate Compliance Officer (CCO) is responsible for ensuring that this document is cascaded to all concerned personnel and that it reflects actual practice.

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Policies

Prohibited Acts

1. All employees are prohibited from receiving, accepting, agreeing to receive, any gift, reward, compensation, allowance, in cash or in kind, from any client of the Company or any person with sufficient interests in exchange for any agreement, clearance, or approval.
2. All employees must report the gifts to the Human Resources Department, which, shall in turn issue the appropriate clearance and gate pass and possible valuation of the gift. Novelty gifts of small value are allowed.
3. Employees are not allowed to tamper, edit, change, or introduce any revision or amendment, to any corporate or commercial document, file, or record without the approval of his/her immediate superior. An incident report should be prepared anytime there is a need to change a corporate or commercial document which must be cascaded to all concerned personnel and departments.

Implementation and Monitoring

The implementation of this Policy shall be monitored at all times, especially when cases of Bribery, Corruption, and Fraud are discovered. Random and Scheduled Audits shall also be used as tools for the detection of Bribery, Corruption, and Fraud.

In the instance any employee or officer of F2 Global Logistics makes any discovery which would lead him or her to believe that Bribery, Corruption, and Fraud have been committed, the following procedures are to be followed:

1. Preparation of incident report to be submitted to the Immediate Superior of the Concerned Employee and the Corporate Compliance Officer.
2. The IS and the CCO shall determine the extent of the Bribery, Corruption, or Fraud and all personnel involved.

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3. The CCO shall then issue Notice/s to Explain (NTE) to all concerned personnel instructing them to explain in writing all events and activities relevant to the Case in question.
4. The CCO shall release a Report within 5 working days from the submission of the Explanation. Said report shall contain possible punishments whether based on Company Policies.
5. The Employee concerned shall be placed under preventive suspension for a period not more than thirty (30) days within which a full-scale investigation shall be undertaken to determine whether Criminal Prosecution shall be resorted to.

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