

	<b>PHILIPPINE REALTY AND HOLDINGS CORPORATION</b>		
	Policy No. <b>P-2015-003</b>	Title: <b>CONFLICT OF INTEREST</b>	Page 1 of 1
	Version No. <b>2</b>	Subject for review: <b>At least Annually</b>	

## **A. INTRODUCTION**

Philippine Realty and Holdings Corporation (the “Company”) is committed to conducting its business with the highest ethical standards and complying fully with its legal and regulatory obligations. Inherent in the business industry are situations where the interests of clients might conflict (or appear to conflict) with the interests of the Company or other clients.

## **B. OBJECTIVE**

This policy, is intended to promote the best interest of the Company. Transactions which may have the potential of being deemed as of Conflict of Interest are discouraged and must be avoided.

## **C. COVERAGE AND EXPECTATIONS**

1. This policy applies to, and shall observe by:
  - i. All members of the Board of Directors;
  - ii. Officers and/or Executives; and
  - iii. All PRHC employees (including consultants and/or advisers, if any)
2. This policy expects that all covered persons stated in **C.1** shall (*but not limited to the following*):
  - i. Disclose the extent of their business interests in order to determine any possible conflicts of interest.
  - ii. Make business decisions and actions in the best interest of PRHC and its subsidiaries.
  - iii. Not allow any business dealings on behalf of PRHC to be influenced, or even appear to be influenced, by any personal or family interests.

## **D. AREAS WHICH MAY GIVE RISE TO A CONFLICT OF INTEREST**

The areas which conflict of interest arises include, but not limited to the following:

1. Abuse of authority for personal advantage.
2. Personal or business involvement with PRHC and its competitors/customers/suppliers.
3. Vested interest with PRHC’s suppliers/competitors/customers.
4. Business transactions for PRHC with relatives or personal friends.
5. Disclosure of business activities outside PRHC and business associates.
6. Unauthorized disbursement of funds.
7. Use of PRHC resources, information, and data for personal gain.
8. Giving out confidential information for personal gain.
9. Acceptance of gifts or bribes.

## **E. ACCOUNTABILITY**

Any possible conflicts of interest must be disclosed by the employee involved to his or her department heads/managers who will, in turn, review and resolve the conflict situation based on guidelines and in consultation with the Management Committee.