

FIRST GEN CORPORATION
Policy on Anti-Bribery and Corruption

First Gen Corporation (the "Company") is one with the Lopez Group of Companies in upholding the principles of honesty, integrity, and transparency in conducting business. In line with this, the Company strictly prohibits any form of bribery and corruption within the Company, as well as in dealing with its business partners, service providers, customers and governmental agencies and instrumentalities.

The Company recognizes and is proud of the culture of generosity, kindness and camaraderie prevailing in the Philippines. In performing acts in accordance with such customs, the Company is guided by the principle of ensuring that gifts and/or services which are customarily given in the ordinary course of business are appropriate to the occasion.

The following shall be considered acts of Bribery and Corruption:

1. Directly or indirectly offering, giving, requesting, or receiving money, gifts or anything of value for the purpose of influencing decisions or to gain unfair advantage in company transactions;
2. Using or performing official functions for personal gain;
3. Performing or neglecting to perform any official function in exchange for receiving favors or benefits in the course of business;
4. Any actions similar to those stated above.

Any act, attempt or allegation of bribery and corruption shall be treated seriously and dealt with swiftly. In handling any case of bribery or corruption, the Company shall be guided by the Company Manual on Corporate Governance, Company Code on Employee Discipline, the Revised Penal Code, and other relevant laws and regulations pertaining to the said subject.

Any act or attempt by a Company employee to commit bribery or corruption should be reported to the Human Resources Department, the Internal Audit Group or the employee's immediate supervisor. The procedure for reporting and the protection afforded by the Company Whistleblower Policy shall apply in each instance of reported bribery and corruption.

APPROVED:



FRANCIS GILES B. PUNO
President & COO