



EAGLE CEMENT CORPORATION

Head Office: 155 Brgy. Wack Wack, EDSA Mandaluyong City, Philippines

Plant: Bgy. Akle, San Ildefonso Bulacan, Philippines

Tel. No.: +632-301-3453

www.eaglecement.com.ph

EAGLE CEMENT CORPORATION SUPPLIER CODE OF CONDUCT

PURPOSE & APPLICABILITY

Eagle Cement Corporation, together with its subsidiaries (collectively, the "Company"), adopts the Supplier Code of Conduct (the "Code") of San Miguel Corporation.

The Company is committed to doing business in an ethical, legal, and socially responsible manner, and to maintaining the highest standards of honesty and integrity in all aspects of its business. The Company complies with the applicable laws of the country and regulations of the local jurisdiction where it operates.

This Code applies to all Suppliers and all employees, personnel, agents, subcontractors, and similar individuals or entities hired or engaged by the Company, or providing goods or services through the Suppliers. "Company Supplier" or "Supplier" shall refer to any person or entity that provides or is contractually obligated to provide, at any time, products and/or services to the Company.

This Code is issued to promote and ensure the integrity of business dealings between the Company and its Suppliers. It is intended to establish clear compliance standards and ethical principles that all Suppliers are bound to observe. The Company reserves the right to, among others, refuse or withdraw the accredited status of a Supplier who is found to have breached any part of this Code.

With the expectation that each Supplier is aware of and complies with all applicable laws and regulations, the Suppliers shall adopt and practice the highest standards of business ethics and meet the following minimum requirements to be able to continually do business with the Company.

SUPPLIER CODE OF CONDUCT

Compliance with Laws, Regulations and Published Standards

Suppliers of the Company must comply with applicable laws, codes, rules, or regulations of the country and localities in which they operate. This includes, but is not limited to, laws and regulations relating to environmental, occupational health and safety, labor practices, and data privacy.

Ethical Business Practices

Suppliers shall conduct their businesses in accordance with the highest standards of ethical behavior. Towards this end, they are expected to conform to and/or observe at all times each of the following:

Fair Trade Practices



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Suppliers shall not enter into any anti-competitive agreement, abuse its dominant market position or engage in any unfair competition practices or activities, whether individually or in collusion with others. Typical examples of this conduct include, but are not limited to, practices that damage the rights and interests of end users, such as collusive bidding, price fixing, price discrimination, or other unfair trade practices in violation of antitrust laws.

Anti-Bribery

Suppliers shall not offer, make, or receive any form of bribe in order to win or retain business, or seek to influence a business or regulatory decision inappropriately. This shall include offering or providing any bribe, kickback, contribution, gift, favor, hospitality, entertainment, secret commission, reward, employment or promise of employment, or anything of value to (i) compromise the objectivity of the Company or any of its employee or representative, or any government official or employee in making decisions; or (ii) obtain an undue advantage or benefit from the Company or any government official or employee. Suppliers shall not pay, loan, or otherwise disburse in any manner any funds or assets or make any payments, whether direct or indirect, to any employee, representative, consultant or to any third party, that may create the appearance of impropriety or constitute a violation of any law under any jurisdiction.

Anti-Fraud

Suppliers shall not be involved in or facilitate any act of theft, fraud, falsification, embezzlement, or misappropriation of any asset of the Company.

Conflicts of Interest

Suppliers are expected to disclose to the Company any situation that appears as a conflict of interest or any situation where any officer, employee, or representative of the Company may have an interest of any kind in the Supplier's business or any kind of economic, familial or personal ties with the same, such as but not limited to being an owner, officer, or employee of such business, or a relative of its owner, partner, controlling stockholder, president/CEO, or senior officer within the second degree of consanguinity or affinity, or having any other type of close personal or social relationship with its owner, partner, controlling stockholder, president/CEO, or senior officer.

Other Supplier Policies and Agreements

Suppliers shall comply with the policies and procedures of the Company applicable to suppliers, including, the Policy on Conflict of Interest. These policies and procedures may be amended from time to time and may be accessed through the Company website.

Suppliers shall regularly monitor and review their implementation of the applicable policies and procedures of the Company, and provide regular training on the same to their employees.

Intellectual Property and Confidentiality



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Suppliers shall respect the intellectual property rights of others, including of the Company, its affiliates and business partners. They shall:

- take appropriate steps to safeguard and maintain confidential and proprietary information of the Company and shall use such information only for the purposes specified by the Company;
- not engage in any act that may infringe upon any Company patent, trademark, or copyright, and shall comply with all requirements, under both law and contract, or as may be established by the Company, as to their allowed use;
- not transmit confidential or proprietary information of the Company via the internet unless such information is secured (e.g., through encryption) in accordance with minimum standards established by the Company;
- comply with applicable laws and regulations on the collection, transfer, processing, and retention of all personal information and sensitive personal information. They shall implement the appropriate and reasonable level of organizational, physical, and technical security measures in accordance with applicable policies to ensure the confidentiality and integrity of sensitive company information, and protect the same against accidental, unlawful or unauthorized processing;
- keep current a non-disclosure agreement with the Company to protect the integrity and proprietary nature of all confidential information, it being understood that the Supplier shall be responsible for all acts committed by employees, agents, and advisers, or its representatives or its subsidiaries and their employees, agents, advisers or representatives;
- retain the right to audit the supplier processes and controls related to the agreement, or to employ a mutually agreed independent party auditor for this purpose;
- implement proper management of information and accesses on its lifecycle (e.g., creation, use, handling, return, termination);
- in case of product deliveries, provide a warranty that the product is free of errors and known vulnerabilities;
- implement relevant regulations for subcontracting, such as those controls that ensure that the subcontractor meets the regulatory and compliance requirements of the Company;
- provide, where applicable, relevant agreement partners, including a contact person for information security issues;
- when deemed necessary based on the results of the risk assessment, agree with the Company upon penalties that will apply in the event that security-related controls were not implemented at all, not implemented as per agreed specifications, or found to be deficient. The impact of the penalties should be greater than the cost of implementing and maintaining the given control, so as to ensure compliance with contractual commitments.

Data Privacy

Suppliers shall comply with the applicable provisions of the Data Privacy Act of 2012, also known as Republic Act No. 10173, its implementing rules and regulations, the issuances and circulars of the National Privacy Commission (NPC), as well as other applicable personal data privacy and protection laws and regulations (collectively, "Privacy Laws").

At all times, Suppliers shall implement the appropriate and reasonable level of organizational, physical, and technical security measures to ensure the confidentiality, integrity, and



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availability of any personal information and sensitive personal information as defined under the Privacy Laws (collectively "Personal Data") that may be processed pursuant to a contract or transaction, and protect such against accidental, unlawful or unauthorized processing.

In the event that any Personal Data shall be disclosed by Supplier in relation to any supply agreement, Supplier consents to the processing of Personal Data which may be collected or which it may provide to the Company, and shall ensure that the required consents under the Privacy Laws have been obtained from its relevant Data Subjects (as defined under the Privacy Laws).

Supplier shall make available all information necessary to demonstrate compliance with the obligations laid down in the Privacy Laws, including but not limited to the submission of a valid Certificate of Registration with an applicable regulator such as the NPC, and updated contact details of the Data Protection Officer.

Environmental Practices

Suppliers shall continually look for ways to minimize unnecessary consumption of energy and resources, and the production of unnecessary waste, greenhouse gas emissions, and environmentally damaging discharges in their operations, products, and services. Suppliers shall foster and maintain a management culture and attitude that establishes a results-based system toward the continual improvement of their environmental, health and safety practices and performance. Suppliers shall comply with environmental laws and regulations applicable to their operations worldwide. Such compliance shall include, among other things:

- Obtaining and maintaining environmental permits and timely filing of required reports
- Proper handling and disposition of hazardous materials
- Monitoring, controlling, and treating discharges generated from operations

Occupational Health and Safety (OH&S) Practices

All business practices must comply with all relevant local and national laws, codes, and regulations.

Suppliers must provide a safe and healthy working environment for all employees that includes appropriate controls, safety procedures, preventative maintenance, and protective equipment in order to prevent accidents and injury as a result of their operation. Suppliers shall, among other things, provide or observe the following:

- Occupational health and safety training;
- A system for reporting injury and illness;
- Worker exposure to physically demanding tasks, including manual material handling and heavy lifting, prolonged standing, and highly repetitive or forceful assembly tasks is to be identified, evaluated, and controlled;
- Medical treatment and/or compensation to injured/ill workers, where the injury or illness is a result of or in connection with undertaking work for the Supplier;
- Worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled. When hazards cannot be adequately controlled by engineering



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and administrative means, workers are to be provided with appropriate personal protective equipment;

- Machine safeguarding and other protective measures to prevent injuries/illnesses to workers;
- Workers are to be provided clean and safe facilities including clean toilet facilities, access to potable water, and sanitary food preparation and storage facilities;
- Worker dormitories provided by the Suppliers, if applicable, are to be clean, and safe, and provide emergency egress, adequate heat and ventilation, and reasonable personal space;
- Additional OSH requirements as part of the Supplier Accreditation process to ensure OSH compliance of suppliers/contractors to ESG standards in Sustainability Reporting;
- Certificate of Compliance on Occupational Safety and Health Standards;
- DOLE approved OSH/COSH program with the conduct of HIRAC;
- Occupational safety and health practitioner
 - * Certified First Aider;
 - * Certificate of attendance for all workers on the 8-hour mandatory safety orientation;
- Certificate of competency of skilled workers; and
- Appropriate business registration documents (i.e. DOLE OSHS Rule 1020).

Labor Practices

The Company expects its suppliers to adopt sound labor practices and treat their workers fairly in accordance with applicable laws and regulations. In addition, Suppliers must comply with the following standards:

- **Freely Chosen Employment:** Suppliers must not utilize or benefit in any way from forced or compulsory labor, nor utilize factories or subcontractors that utilize forced or compulsory labor. Suppliers must support and respect the protection of internationally proclaimed human rights and not willingly or knowingly assist in any violation of human rights, nor benefit from human rights abuses committed by another party, nor remain silent when human rights violations are being committed.
- **Human Trafficking and Slavery:** The Company is opposed to slavery and human trafficking and is committed to complying with applicable laws prohibiting such exploitation. Suppliers are held to the same level of commitment and are expected to fully comply accordingly.
- **No Child Labor:** Suppliers shall comply with local minimum working age laws and requirements and not employ child labor. Suppliers must only employ workers who meet the applicable minimum legal age requirement. They are also expected to comply with all other applicable child labor laws. Suppliers are expected to support and participate in industry efforts aimed at the elimination of such practices wherever they exist in the supply chain.
- **Minimum Wages:** Company Suppliers shall provide wages for regular and overtime work and benefits that meet or exceed legal requirements.
- **Working Hours:** Suppliers shall not require workers to work more than the maximum hours of daily labor set by local laws.
- **No Harsh, Inhumane Treatment or Abuse:** Suppliers shall treat each employee with dignity and respect. They shall prohibit threats of violence, physical punishment, confinement or any other form of physical, sexual, psychological, or verbal harassment or abuse and all other forms of intimidation or harassment in the workplace.



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- **No Discrimination:** Suppliers shall not discriminate in its employment practices on the basis of race, color, religion, sex, gender, gender identity, sexual orientation, age, disability, national origin, creed, maternity, political opinion or membership, familial status, social class, or any other basis prohibited by law.
- **Freedom of Association:** Suppliers shall recognize and respect the rights of its workers to join or to refrain from joining associations of their own choosing and the right to collective bargaining in accordance with local labor laws and established practices.

Responsible Sourcing

Suppliers shall exercise appropriate due diligence in selecting their own suppliers and subcontractors in order to ensure responsible sourcing throughout the supply chain. Suppliers shall not source raw materials or components from persons or entities linked with illegal activities, human rights abuses or terrorism.

Export Sanctions/Terrorism Activities

- Suppliers must abide by all economic sanctions, trade embargoes, or export controls that the Philippines has adopted, whether the same applies to other countries, or any political or particular foreign individual and entity.
- Suppliers must not directly or indirectly engage in or support any terrorist activity.

Financial Integrity

Suppliers shall disclose their financial performance clearly and accurately in accordance with accounting principles appropriate to the size, nature, and form of their business. All commercial dealings of Supplier shall be performed transparently and recorded truthfully in its books and records. Suppliers shall establish suitable information security controls to ensure that no confidential information in the Supplier's possession related to the Company or the Company's clients is used to engage in or support insider trading. Neither any Supplier nor any of its employees shall participate in money laundering.

CONSEQUENCES OF ANY VIOLATION OF THIS CODE OF CONDUCT

Breach of this Code of Conduct may result in actions being invoked against the Supplier, in addition to any contractual or legal remedies available to the Company or the clients. The actions applied will depend on the nature and seriousness of the breach and on the degree of commitment shown by the Supplier in breach of its obligations under the Code of Conduct.

DEMONSTRATING COMPLIANCE

Suppliers must be able to demonstrate compliance with this Code upon request of the Company or the Company clients. Said compliance may be established via sworn self-certifications of the Supplier or via the conduct, through internal departments or independent third parties, of audits, on-site evaluations, and inspections of relevant facilities and locations. Suppliers shall cooperate with said audits and inspections in all respects.

VERSION UPDATE



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This Code of Conduct is posted on the Company's website at www.eaglecement.com.ph. The Company reserves the right to supplement and change this Code of Conduct at any time. Suppliers are expected to monitor the website regularly for changes to this Code.

SUBMITTING QUESTIONS OR REPORTING VIOLATIONS

If Suppliers have any question about this Code of Conduct, or become aware of any violations of this Code that is believed in good faith to be either an actual or potential violation, please send an email to info@eagle-cement.com.ph. Please submit the questions or report any suspicious behavior which may constitute a violation with your contact details.