

DAMOSALAND

CODE OF BUSINESS CONDUCT AND ETHICS



**ANFLO MANAGEMENT AND INVESTMENT CORP
HUMAN CAPITAL MANAGEMENT**

**Effective Date:
MARCH 4, 2024**

Revision No. 02-2024

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CODE OF BUSINESS CONDUCT AND ETHICS

INTRODUCTION

At Damosa Land Inc., we firmly believe that maintaining the highest standards of ethical conduct is not only a fundamental aspect of our organizational identity but also the cornerstone of our sustained success and esteemed reputation within the real estate and construction industry. This Code of Business Conduct and Ethics, hereinafter referred to as the "Code," serves as a comprehensive framework that delineates the principles, values, and behavioral standards that must guide every decision and action undertaken by individuals associated with our company. It is a testament to our unwavering commitment to uphold integrity, transparency, and respect in all facets of our business operations, ensuring that our interactions with employees, clients, partners, and communities reflect these core tenets.

This Code is universally applicable to all individuals affiliated with Damosa Land Inc., encompassing employees at all levels, officers, directors, contractors, and representatives who act on behalf of the company. Furthermore, we extend an expectation to our external stakeholders—such as business partners, suppliers, and subcontractors—to align their practices with ethical standards that mirror those outlined in this document, fostering a collaborative environment rooted in mutual respect and accountability.


By adhering to the guidelines set forth in this Code, we collectively ensure that our operations remain in strict compliance with all relevant legal requirements, safeguard the interests of our stakeholders, and actively contribute to the betterment of the communities in the regions where we operate. Should any individual encounter a situation that raises questions about the application of this Code or presents an ethical dilemma not explicitly addressed herein, we encourage them to promptly seek guidance from their supervisor, the Human Resources department, or the designated Ethics Committee to ensure consistent and principled decision-making.

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OBJECTIVES

At the heart of our organization lies a commitment to ethical conduct and integrity, which serves as the foundation for all our actions and decisions. This Code of Business Conduct and Ethics outlines our dedication to fostering a workplace that upholds the highest standards of ethical behavior, compliance, and accountability. The following objectives guide the creation of this code, ensuring that our values translate into meaningful actions that strengthen our organization and its relationships with all stakeholders:

1. Establish a framework for ethical decision-making and behavior at all organizational levels, guiding employees in aligning their actions with the company's core values.
2. Ensure compliance with applicable laws, regulations, and industry standards, mitigating legal risks and upholding organizational integrity.
3. Promote a culture of integrity, accountability, and transparency, encouraging honest and responsible conduct in all business dealings.
4. Protect the company's reputation and maintain stakeholder trust, including relationships with clients, partners, employees, and communities, by adhering to high ethical standards.
5. Provide guidance on ethical dilemmas and misconduct reporting, ensuring employees have clear processes to navigate challenges and report violations safely.
6. Foster a respectful, inclusive, and harassment-free workplace, valuing diversity and ensuring all individuals are treated with dignity and fairness.

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CORE VALUES

The actions and decisions of Damosa Land Inc. are deeply rooted in a set of guiding principles that define who we are as an organization and shape our approach to business. These core values are the bedrock upon which we build our reputation and relationships:

Our core values define who we are and how we operate. They are the foundation of our success and must guide every decision and interaction:

- **INTEGRITY**

We uphold honesty, trustworthiness, and fairness in all we do. Employees must adhere to high ethical standards, ensuring transparency and accountability in dealings with colleagues, clients, and partners.

- **PROFESSIONALISM**

We strive for high competence, delivering effective, efficient, and responsible service. Employees are expected to perform their duties with excellence, contributing to the quality and innovation that define our projects.


- **RESPECT FOR THE INDIVIDUAL**

We recognize the talents, abilities, and achievements of every person. By empowering our employees through the responsible delegation of authority, we tap into their potential, fostering growth and a supportive work environment.

- **TEAMWORK**

We embrace unity of purpose and cooperation. Working collaboratively, we achieve shared goals, leveraging collective strengths to deliver outstanding results.

These values are actionable standards that employees must embody daily.


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COMPLIANCE WITH LAWS AND REGULATIONS

Damosa Land Inc. is steadfastly committed to operating within the bounds of all applicable laws and regulations in the Philippines, as well as in any other jurisdictions where our business activities extend. This commitment is non-negotiable and serves as a critical pillar of our ethical framework. Among the key legal frameworks, we adhere to are:

- The National Building Code of the Philippines, which governs the standards for safe and sustainable construction practices;
- The Real Estate Investment Trust (REIT) Act, which regulates real estate investment opportunities and ensures transparency in financial dealings;
- The Urban Development and Housing Act, which mandates responsible land use and affordable housing provisions;
- Environmental laws enforced by the Department of Environment and Natural Resources (DENR), ensuring our projects align with ecological preservation mandates;
- The Anti-Graft and Corrupt Practices Act, which prohibits unethical conduct in business dealings with public entities;
- The Data Privacy Act of 2012, which safeguards personal information in our custody.
- Labor Code of the Philippines
- Republic Act No. 11313: Safe Spaces Act (Bawal Bastos Law)
- RA 11058: An Act Strengthening Compliance with Occupational Safety and Health Standards and Providing Penalties for Violations Thereof
- Republic Act 7877: The Anti-Sexual Harassment Act of 1995

It is incumbent upon all employees to take proactive steps to familiarize themselves with the laws and regulations pertinent to their specific roles within the company. Should any uncertainty arise regarding compliance obligations or the interpretation of legal requirements, employees are strongly encouraged to consult the Legal Department for expert guidance and support to ensure full adherence to these standards.


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WORKPLACE CONDUCT

Damosa Land Inc. is dedicated to fostering a workplace environment that is safe, respectful, and inclusive for all individuals, recognizing that our employees are our most valuable asset and that their well-being directly impacts our success. To this end, all employees are expected to uphold the following standards of conduct:

- Treat every colleague, client, and stakeholder with respect, acknowledging the inherent worth of each individual irrespective of their position, cultural background, or personal characteristics, and fostering a culture of mutual appreciation and collaboration.
- Refrain from engaging in any form of discrimination, harassment, or bullying, whether verbal, physical, or psychological, understanding that such behaviors undermine our values and will not be tolerated under any circumstances.
- Adhere strictly to occupational safety and health standards, particularly on construction sites where risks are heightened, ensuring that all safety protocols are followed diligently to protect oneself and others from harm.
- Report immediately any unsafe conditions, incidents, or behaviors observed in the workplace, enabling swift corrective action to maintain a secure and healthy working environment for all.
- Actively support diversity and inclusion initiatives, contributing to a workplace where differences are embraced, and all employees feel empowered to bring their authentic selves to work.

Violations of these workplace conduct expectations are considered serious breaches of this Code and may result in disciplinary measures, up to and including termination, depending on the severity and circumstances of the infraction.

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OCCUPATIONAL SAFETY AND HEALTH POLICY

Damosa Land Inc. is unwavering in its commitment to fostering a safe, healthy, and supportive work environment for all employees, contractors, and visitors. We prioritize occupational safety and health as a fundamental pillar of our operations, striving not only to meet but to exceed the standards set by the *Occupational Safety and Health Standards* of the Philippines. Recognizing the inherent risks in real estate and construction, we ensure that safety is embedded in every aspect of our work.

COMPANY RESPONSIBILITIES

Damosa Land Inc. is dedicated to creating and maintaining a culture of safety. To achieve this, the company will:

- **Provide Comprehensive Safety Training:**
 - a) Deliver tailored training programs for all employees and contractors, including initial orientation, job-specific safety training, and regular refresher courses.
 - b) Ensure training covers critical areas such as emergency procedures, hazard recognition, safe work practices, and the proper use of equipment.
 - c) Conduct training sessions led by qualified safety professionals and assess employee understanding through practical demonstrations and evaluations.
- **Supply and Maintain Personal Protective Equipment (PPE):**
 - a) Provide appropriate PPE at no cost to employees and contractors, ensuring it meets industry standards.
 - b) Offer training on the correct use, maintenance, and storage of PPE.
 - c) Conduct regular inspections of PPE to ensure it remains in good condition and replace any defective equipment immediately.
- **Implement and Enforce Rigorous Safety Protocols:**
 - a) Develop and enforce safety protocols for high-risk activities, including working at heights, electrical safety, fire prevention, ergonomics, and hazardous material handling.
 - b) Regularly review and update safety protocols in consultation with safety experts, industry standards, and regulatory changes.
 - c) Ensure all safety procedures are clearly communicated and accessible to all personnel.

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- **Conduct Safety Audits, Inspections, and Risk Assessments:**

- Perform routine safety audits and inspections, including both scheduled and unannounced visits, led by a dedicated safety team.
- Proactively identify hazards through risk assessments and implement corrective actions to mitigate risks.
- Document all findings and track corrective actions to completion, ensuring continuous improvement.

- **Maintain Detailed Safety Records:**

- Keep comprehensive records of all safety-related activities, including training logs, incident and near-miss reports, audit findings, and corrective actions.
- Analyze records to identify trends, improve safety programs, and prevent future incidents.

EMPLOYEE RESPONSIBILITIES

Safety is a shared responsibility. All employees are expected to:

- **Actively Participate in Safety Training:**

- Complete all required safety training sessions and demonstrate understanding through assessments or practical evaluations.
- Apply learned safety practices in daily work activities.

- **Properly Use and Maintain PPE:**


- Use provided PPE correctly and consistently as instructed.
- Inspect PPE before each use and report any defects or malfunctions immediately.
- Store PPE properly when not in use to prevent damage.

- **Adhere to Safety Protocols:**

- Follow all safety procedures and use equipment only as trained.
- Participate in safety meetings, drills, and other safety-related activities.
- Refrain from taking shortcuts that compromise safety.

- **Report Hazards, Incidents, and Unsafe Conditions:**

- Immediately report all incidents, near-misses, or unsafe conditions to supervisors or

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through designated reporting channels.

- b) Report any personal health issues or conditions that may affect the ability to perform duties safely.

- **Cooperate with Safety Investigations:**

- a) Provide honest and timely feedback during safety audits, inspections, and investigations.
- b) Assist in identifying root causes of incidents and suggest improvements.

CONSEQUENCES OF NON-COMPLIANCE

Damosa Land Inc. takes violations of safety policies seriously. Non-compliance may result in disciplinary action, which could include:

- Verbal or written warnings for minor infractions.
- Mandatory retraining or suspension for repeated or moderate violations.
- Termination of employment for severe or willful disregard of safety protocols.
- Legal action in cases of gross negligence or misconduct that leads to serious harm or legal violations.

The company reserves the right to determine the appropriate level of disciplinary action based on the severity, frequency, and intent of the violation.


LEADERSHIP COMMITMENT

"At Damosa Land Inc., safety is not just a priority—it is a core value that guides every decision we make. We are committed to ensuring that every individual, from employees to contractors and visitors, returns home safely each day. This commitment is reflected in our actions, our investments in safety resources, and our culture of accountability."

MENTAL HEALTH AND WELL-BEING

Damosa Land Inc. recognizes that mental health is as critical as physical safety. To support the mental well-being of our employees, we provide:

- **Mental Health Training:**
 - a) Integration of mental health awareness into safety training programs, including strategies for stress management, resilience building, and recognizing signs of mental health issues.

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- **Supportive Workplace Culture:**

- a) An open-door policy where employees can discuss mental health concerns with HR or supervisors without fear of stigma or reprisal.
- b) Regular mental health check-ins and peer support initiatives.

- **Work-Life Balance Initiatives:**

- a) Flexible work arrangements, including remote work options and flexible hours.
- b) Paid time off for mental health days and encouragement to take regular breaks during the workday.
- c) Wellness programs promoting physical activity, mindfulness, and relaxation techniques.

Employees are strongly encouraged to utilize these resources and raise any mental health concerns early.

REPORTING MECHANISMS

Damosa Land Inc. provides multiple channels for reporting safety hazards, violations, incidents, or concerns:

- **Direct Reporting:** Speak to your immediate supervisor or contact the Integrated Safety Department directly.
- **Online Reporting:** Submit reports via the company's secure web form or email.


All reports will be investigated promptly, and appropriate actions will be taken to address the issue. Retaliation against anyone who reports a safety concern in good faith is strictly prohibited and will result in disciplinary action.

CONTRACTOR AND VISITOR SAFETY

- **Contractors:** All contractors working with Damosa Land Inc. must adhere to the same safety standards and protocols as employees. Contractors are required to complete safety training and provide their own PPE, which must meet company standards.
- **Visitors:** Visitors to company sites will receive a safety briefing upon arrival and must comply with all safety instructions, including the use of PPE where required.

EMERGENCY PREPAREDNESS

Damosa Land Inc. maintains robust emergency preparedness plans, including:


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- Evacuation procedures for fire, natural disasters, and other emergencies.
- First aid and medical response protocols, with trained personnel on-site.
- Regular emergency drills to ensure readiness.

Emergency plans are reviewed annually and updated as necessary to reflect changes in operations or risks.

POLICY ACCESSIBILITY AND REVIEW

This policy is available to all employees in both digital and print formats and will be provided in multiple languages if required. It will be reviewed annually to ensure it remains aligned with legal requirements, industry best practices, and the evolving needs of our workforce.


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CONFLICTS OF INTEREST

A conflict of interest arises whenever an individual's personal interests, relationships, or activities have the potential to interfere with their ability to perform their duties at **Damosa Land Inc.** in an objective and impartial manner. To prevent and manage such situations effectively, employees must:

- Disclose promptly any financial interests or investments held in competitors, suppliers, subcontractors, or clients that could influence their decision-making or create the perception of bias in their professional responsibilities.
- Refrain from using company resources, including time, equipment, or proprietary information, for personal gain or benefit, ensuring that all company assets are utilized solely for legitimate business purposes.
- Avoid engaging in situations where family ties, close personal relationships, or external affiliations could unduly influence business decisions, such as hiring, contracting, or project approvals, to maintain fairness and impartiality.
- Seek prior approval from a supervisor or the Human Capital Management before accepting gifts, hospitality, or other benefits from business partners, ensuring that such actions do not compromise independence or create obligations that could affect company interests.

If an employee suspects that they may be involved in or exposed to a potential conflict of interest, they are obligated to disclose the matter immediately to their supervisor or the Human Capital Management for review and resolution, ensuring transparency and alignment with company values.


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CONFIDENTIALITY AND DATA PROTECTION

Protecting sensitive information is a critical responsibility at Damosa Land Inc., given the trust placed in us by our clients, partners, and stakeholders. Employees are entrusted with safeguarding confidential data and must adhere to the following guidelines:

- Handle with utmost care all client data, financial records, proprietary designs, and other sensitive information entrusted to the company, recognizing that breaches of confidentiality can damage our reputation and relationships irreparably.
- Utilize secure, company-approved methods for storing, transmitting, and disposing of confidential information, ensuring that such data is protected from unauthorized access, loss, or misuse at all times.
- Comply fully with the provisions of the Data Privacy Act of 2012, which mandates the responsible handling of personal data, including obtaining consent where required and limiting its use to legitimate business purposes.
- Report immediately any suspected or actual breaches of confidentiality or data security to the appropriate supervisor or IT department, enabling swift action to mitigate risks and address vulnerabilities in our systems.

Unauthorized disclosure, whether intentional or negligent, of confidential information constitutes a grave violation of this Code and may result in disciplinary action, legal liability, and damage to the company's standing in the industry.


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ETHICAL BUSINESS PRACTICES

Damosa Land Inc. is committed to conducting its business operations with fairness, honesty, and ethical rigor, ensuring that our practices uphold the trust of our stakeholders and the integrity of the marketplace. To achieve this, we require all employees to:

- Prohibit and refrain from offering, soliciting, or accepting bribery, corruption, or facilitation payments in any form, recognizing that such actions undermine fair competition and violate both company policy and applicable laws.
- Compete fairly in the marketplace by adhering to antitrust laws and regulations, avoiding any agreements or practices that could restrict trade, manipulate pricing, or disadvantage competitors unfairly.
- Provide accurate, truthful, and transparent information in all marketing materials, sales representations, and client communications, ensuring that our promises align with our capabilities and deliverables.
- Ensure that all business transactions, including contracts, payments, and project documentation, are conducted with full transparency and are accurately recorded in accordance with company policies and legal standards.
- Adhere to the highest quality standards in construction and development activities, delivering projects that meet or exceed regulatory requirements and client expectations without cutting corners or compromising safety.

Employees must neither engage in nor tolerate unethical practices, and any observed deviations from these principles must be reported promptly to uphold our commitment to ethical excellence.


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ENVIRONMENTAL AND COMMUNITY RESPONSIBILITY

As a real estate and construction company, Damosa Land Inc. recognizes its profound responsibility to protect the environment and uplift the communities impacted by our projects. We are committed to the following principles:

- Obtain and comply with all necessary environmental clearances, such as Environmental Compliance Certificates (ECC), prior to commencing any development or construction activities, ensuring that our projects meet stringent ecological standards.
- Incorporate sustainable materials, energy-efficient designs, and eco-friendly practices into our projects whenever feasible, striving to reduce resource consumption and promote long-term environmental stewardship.
- Minimize waste, pollution, and environmental disruption during construction and operational phases, implementing proactive measures to mitigate our impact on air, water, and land resources.
- Engage actively with local communities by listening to their concerns, incorporating their feedback into project planning, and contributing to their well-being through initiatives such as infrastructure improvements or community programs.
- Support local economies by prioritizing the hiring of local workers and sourcing materials from local suppliers where possible, fostering economic growth and resilience in the areas we serve.

Employees are encouraged to report any environmental hazards, community grievances, or sustainability concerns to the Sustainability Officer, ensuring that we address these issues promptly and responsibly.

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REPORTING AND ENFORCEMENT

Damosa Land Inc. relies on the vigilance and integrity of its employees to uphold this Code, and it is the duty of every individual to report any witnessed or suspected violations. The following reporting mechanisms are available:

- Notify your immediate supervisor, who can provide initial guidance or escalate the matter as needed;
- Contact the Human Capital Management, which is equipped to handle personnel-related concerns confidentially;

The company strictly prohibits retaliation against anyone who reports a violation in good faith, ensuring that whistleblowers are protected from harassment, discrimination, or adverse employment actions. All reported incidents will be investigated thoroughly, promptly, and confidentially by the appropriate internal authorities.

Violations of this Code may lead to disciplinary action, which could range from warnings and retraining to suspension or termination, depending on the nature and severity of the breach. In cases where violations involve illegal activities, the company may pursue legal action, and employees could face civil or criminal consequences as determined by applicable laws.


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ACKNOWLEDGMENT AND TRAINING

To ensure that this Code is not merely a document but a living set of principles integrated into our daily operations, ***Damosa Land Inc.*** requires all employees to actively engage with its contents. Every employee must formally acknowledge that they have read, understood, and agree to abide by the standards outlined in this Code, typically through a signed acknowledgment form submitted to Human Capital Management Department through its Labor's Relation Section.

New employees will receive comprehensive training on the Code as part of their onboarding process, equipping them with the knowledge and tools necessary to apply its principles from the outset of their tenure. Additionally, all employees will participate in annual refresher training sessions to reinforce their understanding of the Code, address any updates or revisions, and discuss real-world scenarios that illustrate its application.

Supervisors and managers bear an additional responsibility to lead by example and ensure that their teams fully comprehend and adhere to the Code's expectations. They must foster an environment where ethical behavior is the norm and provide support to employees who seek clarification or guidance on ethical matters.

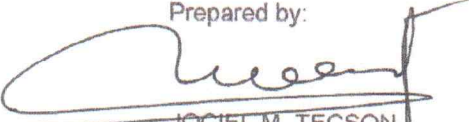
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REFERENCES


The following legal and industry standards inform the policies and expectations outlined in this Code:

- **National Building Code of the Philippines:** Governs construction safety and quality standards.
- **Real Estate Investment Trust (REIT) Act:** Regulates real estate investment frameworks.
- **Urban Development and Housing Act:** Mandates responsible urban planning and housing provisions.
- **Anti-Graft and Corrupt Practices Act:** Prohibits corrupt practices in business and government dealings.
- **Data Privacy Act of 2012:** Protects personal data and regulates its handling.
- **Occupational Safety and Health Standards:** Ensures workplace safety, especially in construction.
- **Philippine Green Building Council Standards:** Promotes sustainable building practices.
- **Labor Code of the Philippines**
- **Republic Act No. 11313: Safe Spaces Act (Bawal Bastos Law)**
- **RA 11058: An Act Strengthening Compliance with Occupational Safety and Health Standards and Providing Penalties for Violations Thereof**
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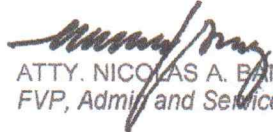
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