

ANTI-SEXUAL HARASSMENT POLICY

This Anti-Sexual Harassment Policy aims to protect the people in our Company from unwanted sexual advances and give them guidelines on how to deal with such incidents.

Our directors, officers, employees and subsidiaries where we have management and operational control are covered by this policy, regardless of their gender, sexual orientation, level, function, seniority or status.

Policy

We do not tolerate sexual harassment in our workplace in any shape or form. Our culture is based on mutual respect and cooperation, and we consider sexual harassment a serious violation of these principles.

The HR departments under the DMCI group of companies should try to prevent sexual harassment by building a culture of dignity, trust and respect within their respective companies. This includes providing trainings, mechanisms and other guidelines for preventing and addressing sexual harassment in the workplace.

Under Philippine law, sexual harassment is committed when a person who, having authority, influence or moral ascendancy over another demands, requests or otherwise requires any sexual favor from the other, regardless of whether the demand, request or requirement for submission is accepted by the object.

Furthermore:

(1) The sexual favor is made as a condition in the hiring or in the employment, re-employment or continued employment of said individual, or in granting said individual favorable compensation, terms of conditions, promotions, or privileges; or the refusal to grant the sexual favor results in limiting, segregating or classifying the employee which in any way would discriminate, deprive or diminish employment opportunities or otherwise adversely affect said employee;

(2) The above acts would impair the employee's rights or privileges under existing labor laws; or

(3) The above acts would result in an intimidating, hostile, or offensive environment for the employee.

In addition, we consider the following as a form of sexual harassment:

- Stalking
- Inappropriate touching
- Sending or displaying sexually explicit objects or messages
- Commenting on someone's looks, dress, sexuality or gender in a derogatory or objectifying manner or a manner that makes them uncomfortable
- Making obscene comments, jokes or gestures that humiliate or offend someone
- Pursuing or flirting with another person persistently without the other person's willing participation

Reporting Procedure

Victims of sexual harassment have two ways to report the incident:

- Request an urgent meeting with the HR Department. Once in the meeting, explain the situation in as much detail as possible. If you have any hard evidence (e.g., emails), forward it or bring it with you to the meeting.
- Send your complaint via email. If you address it to your immediate superior, copy furnish the HR Department in your email and attach any evidence or information

that can be used in the investigation. The HR Department and your supervisor will discuss the issue and contact you as soon as possible.

Disciplinary Action

Depending on the severity and frequency of the incident/s, a person found guilty of sexual harassment may:

- Be reprimanded
- Get transferred
- Receive a poor performance review
- Become ineligible for promotions, bonuses and/or salary increases for a specified period
- Be terminated from their position