



ABS-CBN Corporation - Conflict of Interest Policy

GENERAL-PURPOSE

In performing their job duties, ABS-CBN employees should always act lawfully, ethically, and in the company's best interests. Our Code of Business Conduct and Ethics (the "Code of Conduct") sets out basic guiding principles that govern the expected conduct of employees. Employees who are unsure whether their conduct or the conduct of their coworkers complies with the Code of Conduct should contact their Human Resources Account Officer or the Legal Department. Employees may also report any suspected non-compliance as provided in the company's Whistleblowing Policy.

This policy provides more detail as it relates to the company's Conflict of Interest policy.

SCOPE

The Conflict of Interest Policy applies to all ABS-CBN employees.

STATEMENT OF PRINCIPLES

I. Compliance with Laws, Rules, and Regulations

Employees must follow applicable laws, rules, and regulations at all times. Employees with questions about the applicability or interpretation of any law, rule or regulation, should contact the Legal Department.

II. Conflicts of Interest

In performing their job duties, employees are expected to use their judgment to act, at all times and in all ways, in the best interests of ABS-CBN. A conflict of interest exists when an employee's personal interest interferes with the best interests of ABS-CBN.

Employees should keep in mind conflicts of interest, and employees who believe a conflict of interest may exist should promptly notify their Human Resources Account Officer or the Legal Department.

In turn, the concern may be elevated to the Conflict of Interest Committee. The Conflict of Interest Committee will consider the facts and circumstances of the situation and take appropriate action. The committee is composed of the Office of the Network Ombudsman, Legal Counsel (as appointed by the President and CEO), and the Internal Auditor.

More information on this policy is available in the Kapamilya Way – ABS-CBN Code of Ethics, Code of Conduct, and the Employee Guidelines on the Conflict of Interest Policy.

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