X AyalaLand	MANUAL OF PERSONNEL POLICIES	
POLICY TITLE:	EMPLOYEE RELATIONS	
BUSINESS GIFTS AND GRATUITIES	CHAPTER 4 Section 3	ER 03
	DATE REVISED:	October 1, 2015

1. COVERAGE

All personnel

2. STATEMENT OF POLICY

The company recognizes the Filipino culture of giving and accepting gifts as part of its way to express gratitude to other persons. However, the value of such gift should be within reasonable limits of propriety.

Gifts offered to an employee by clients or suppliers and the like due to their position in the Company should be received in the name of the Company duly acknowledged with gratitude.

3. POLICY PROVISIONS

In connection with an employee's affiliation or position with ALI, he or she may receive gifts or invitations to luncheons or dinners from clients or suppliers.

- 3.1. In general, ALI employees may accept a gift or an invitation if:
 - It is unsolicited.
 - It does not violate any laws
 - It does not discredit ALI
 - It is directly attributable to personal or familial relationships
 - It is promotional item or token of nominal value made available under the client's or supplier's customer or public relations program
 - It is a part of business meetings or discussions e.g. invitation to lunch or dinner by Company clients or suppliers
 - It is not given to influence judgment.
- 3.2. The gift should be inexpensive. In monetary terms, the value of such a gift should be not more than reasonable limits of propriety. The amount of substantial value shall be defined by management and reviewed



periodically. Such substantial value shall be applicable once per giver per year.

Otherwise, if the gift is more than the defined reasonable limits of propriety, and meets all the conditions stated above (3.1), then the employee should accept it with gratitude on behalf of the Company and turn it over to the Human Resources Group for proper disposition.

- 3.3. Employees are not allowed on any occasion to receive cash or gift certificates from business partners.
- 3.4. Under no circumstances should employees accept, directly or indirectly, payments, loans, kickbacks, special privileges, favors, or services from anyone.
- 3.5. It is unacceptable and contrary to ALI's policies to offer money, favors, inappropriate gifts or promises of gifts, or anything else of unusual value to influence direct, obtain or retain business in ALI's favor. Such payments or favors may be considered bribery which violates Company policy as well as existing laws. It is equally unacceptable for any employee to take bribes in any form.

1. ADMINISTRATION

All employees, especially those who transact business with other firms and customers, are responsible for the strict observance of this policy.

AYALA LAND, INC.

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EMILIO # TUMBOCON

Group Head

Human Resources and Public Affairs