

FILIPINO FUND, INC.

ANTI-CORRUPTION AND BRIBERY POLICY

Filipino Fund, Inc. (the "Corporation") upholds the principles of honesty, integrity, and transparency in all its business dealings. In line with this, the Corporation strictly prohibits any form of bribery and corruption within the Corporation, as well as in conducting affairs with its business partners, service providers, stockholders, and governmental agencies and instrumentalities. The Corporation is committed to maintaining the highest possible ethical standards and complying with all applicable laws.

The Corporation recognizes and is proud of the Filipino values of hard work, kindness, and cooperation. Guided by these policies, the Corporation stands by the principle of making sure that customary gifts obtained in the ordinary course of business are only received during appropriate occasions.

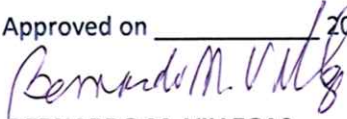
The following acts shall be considered acts of bribery and corruption:

1. Directly or indirectly offering, giving, requesting or receiving money, gifts or anything of value for the purpose of influencing decisions or to gain unfair advantage in the Corporation's transactions;
2. Persuading, inducing or influencing another director/officer/employee to perform an act constituting a violation of any of the rules and regulations of the Corporation or a criminal offense in connection with the official duties of the latter, or allowing himself to be persuaded, induced, or influenced to commit such violation or criminal offense;
3. Using or performing official functions for personal gain;
4. Performing or neglecting to perform any of the director/officer/employee's functions in exchange for receiving favors or benefits in the course of business;
5. Entering, on behalf of the Corporation, into any contract or transaction manifestly and grossly disadvantageous to the same, whether or not the director/officer/employee profited or will profit thereby;
6. Divulging valuable information of a confidential character, acquired by an director/officer/employee on account of one's position to unauthorized persons, or releasing such information in advance of its authorized release date; and
7. Any other similar acts to those stated above.

Any act, attempt or allegation of bribery and corruption shall be treated seriously and dealt with haste. In handling any case of bribery or corruption, the Corporation shall be guided by the Manual on Corporate Governance, the Revised Penal Code, and other relevant laws and regulations.

Any act or attempt by a Corporation's director/officer/employee to commit bribery or corruption should be reported through the Corporation's normal reporting channels or with their human resources contact. The procedure for reporting and protection afforded by the Corporation's Whistleblowing Policy shall apply in each instance of reported bribery and corruption.

Approved on _____/2017 in Makati City.


BERNARDO M. VILLEGAS
Chairman


MARGARET G. ANG
President





FRANK S. GAISANO
Director

JOHN G. TAN
Director



EDWARD S. GO
Director



ALIM C. JAMANDRE
Director



VINCENT E. TOMANENG
Director

