

Company Name BPI / MS Insurance Corporation.	Manual Title Guideline	Document Code G-Com-05
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Document Title Anti-Bribery Measures		Revision No.00 Revision Date:

REVISION HISTORY				
Issue No.	Rev No.	Description of Change	Approved by	Effective Date
01	00	Initial Issue	DMS Tort	August 24, 2017

1. Definition of Bribery

- 1.1 Bribery is an inducement or reward (such as money, gifts or services) offered, promised or provided to civil service employees or politicians in contravention of laws, regulations and normal social conventions in order to gain any commercial, contractual, regulatory or personal advantage.
- 1.2 These guidelines include and apply not only to bribery with respect to above-mentioned civil service employees or politicians but also to any activities similar to bribery with respect to third parties other than civil service employees or politicians.
- 1.3 These guidelines should be read together with Conflict of Interest (R-Com-04).

2. Prevention of Bribery

- 2.1 Prohibit bribery in any form, activities similar to bribery and activities which could give rise to bribery allegations, whether direct or indirect, whether with respect to civil service employees or other third parties, and by or on behalf of the overseas base.

Prepared By: MARY ANN STA. MARIA	Date August 24, 2017
Reviewed & Approved By: ATTY. DANIELLE SALES-TORT	Date

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- 2.2 Demonstrate a strong top-level commitment against bribery with respect to the above (1.0).
- 2.3 Communicate a clear anti-bribery message to all employees and foster an environment whereby bribery is not acceptable.