



## **Communication and Compliance with the Company's Code of Ethics**

SM Prime understands that the continuous growth and development of its corporate governance culture rests on the promotion and awareness of the principles of good governance. As such, the Company continues to strengthen its training and orientation programs. Through the Human Resource Department's (HRD) orientation program, new employees are given an overview of the various components of SM Prime's Corporate Governance Framework, the Code of Ethics and related policies which are also contained in an internal portal for employees' easy access and reference. It also covers the importance of ethics in the business, informs employees of their rights and obligations, as well as the principles and best practices in the promotion of good work ethics. Relative to this, the HRD, on an annual basis, requires all employees to re-take the 3-part Annual Code of Ethics program. This specifically includes the following:

- Confirmation – to confirm that employees have read and understood and agrees to comply with our Company's Code of Ethics, Code of Conduct and Matrix of Violations (including Anti-Money Laundering-specific violations), Insider Trading Policy, Conflict of Interest Policy, Guidelines on Acceptance of Gifts and Travel Sponsored by Business Partners (Anti-Corruption Policy), Information Security Guidelines, among others.
- Handling Conflict of Interest Situations (E-Learning Course) – to be familiarized with the proper disposition of actual or perceived Conflict of Interest situations.
- Disclosure Survey – to disclose each employees' affiliations, interests, relationships, and/or transactions which are relevant for full disclosure of all actual, apparent or possible conflicts of interest.

For Year 2025, the HRD has started to cascade the annual mandatory COE compliance on January 17, 2025. Attached below is the email blast of SMPH HRD.



Fri 1/17/2025 10:00 AM  
SM Prime Learning & Development  
**MANDATORY: 2025 ANNUAL CODE OF ETHICS COURSE | DEADLINE: FEBRUARY 21, 2025**

To  
 You forwarded this message on 1/17/2025 10:53 AM.

**ENROLL NOW**

# 2025 Annual Code of Ethics Course

Deadline: 21 February 2025

ALL employees, officers, and directors of SM Prime Property Group are **REQUIRED**.

### Confirmation

Confirm that you have read, understood, and agree to our Company policies.

### Handling Conflict of Interest Situations

Identify and be familiar with handling conflict of interest situations.

### Disclosure Survey

Disclose actual as well as potential conflicts of interest.

Click here to take the course

For technical concerns, you may refer to the QRG videos below or file a ticket via SMITH.

**Category:** Internal Applications

**Internal Application Name:** SM Prime's Moodle LMS.

The same was also cascaded by the HRD last January 10, 2024:



Wed 1/10/2024 2:51 PM

SM Prime Learning & Development

2024 ANNUAL CODE OF ETHICS COURSE | DEADLINE ON JANUARY 31, 2024

To

 This message was sent with High importance.



**ENROLL NOW!**  
**The 2024 Annual Code of Ethics (ACE) Course**  
**Deadline: 31 January 2024**

### 2024 Annual Code of Ethics Course

**CONFIRMATION**  
Confirm that you have read, understood and agree to our Company policies.

**HANDLING CONFLICT OF INTEREST SITUATIONS**  
Identify and be familiar in handling conflict of interest situations.

**DISCLOSURE SURVEY**  
Disclose actual as well as potential conflicts of interest.

[Click here to take the course](#)

