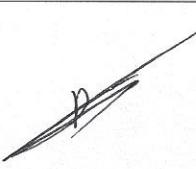
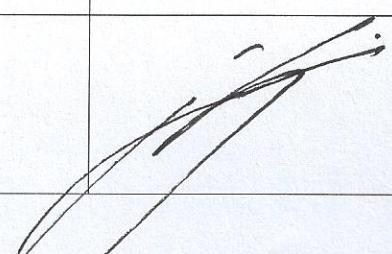


 INVESTMENTS CORPORATION	POLICIES AND PROCEDURES			
	HUMAN RIGHTS POLICY			
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Document Approval

Version	Name and Position	Signature	Date
1.0	Prepared by: Noel T. Ang		
	Reviewed by: Wellington Palmero		
	Approved by: Frederic DyBuncio		

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1.0 POLICY STATEMENTS

Respect for human rights is an essential value of *SM Investment Corporation (SMIC)*. We make every effort to respect and promote human rights in accordance with the International Bill of Human Rights, International Labor Organization Declaration on Fundamental Principles and Rights at Work, and the UN Guiding Principles on Business and Human Rights.

SMIC's Human Rights Policy aligns with our Code of Ethics, Business, and Environmental policies covering diversity, environment, health and safety, and employee relations. We are committed to the principles that all persons should be treated with respect.

2.0 OBJECTIVES

To promote and ensure the constitutional fundamental rights of all individuals are protected and respected without discrimination.

To ensure all business partners and employees of SMIC are aware that harassment and discrimination are unacceptable practices and do not reflect our company's core values.

3.0 COVERAGE

We view the following constituents as stakeholders in our Human Rights Policy, among others: shareholders, employees (whether probationary or regulars), communities, contractors, and vendors/suppliers.

4.0 VARIOUS ASPECTS ON HUMAN RIGHTS

4.1 Workplace Safety

SMIC is fully committed in providing workplaces that are safe and conducive to all our employees. Our policy is to provide a safe and healthy workplace that complies with applicable safety and health laws and regulations. We work to provide and maintain a safe, healthy, and productive workplace, in consultation with our employees, medical experts and addressing and remediating identified risks of accidents, injury and any health impact.

4.2 Workplace Security

SMIC ensures that all employees are safe and productive by providing a secure workplace with 24/7 security personnel and a mobile ambulatory service with medical specialists.

4.3 Working Hours, Compensation and Benefits

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SMIC compensates our employees competitively and fairly in relation to the industry standards. SMIC ensures full compliance with applicable wage, work hours, overtime, and benefit laws in accordance to the laws, rules, and regulation of the Department of Labor.

All employees are given equal opportunity for growth and career advancement. Compensation is meritocracy based pursuant to the performance appraisals that are conducted yearly.

4.4 *Child Labor*

SMIC will not employ child labor, consistent with the provisions of the labor laws of the Philippines.

4.5 *Freedom of Speech and Association*

We promote open communication and forums that allow our employees to bring concerns, suggestions, and ideas forward to produce and facilitate improved methods and efficiencies.

4.6 *Forced Labor and Human Trafficking*

The Company will not use slavery or involuntary labor, whether bonded, prison, military, compulsory labor, including debt servitude or human trafficking with respect to any aspect of its operations.

4.7 *Discrimination and Harassment*

SMIC believes that every employee has the right to be treated fairly and deserves a comfortable and safe working environment. SMIC prohibits discrimination based on age, race, color, religion, sex, nationality, marital status, disability, citizenship, sexual orientation, gender identity or expression, or other-protected characteristic.

Everyone has the right to work without fear or intimidation. SMIC does not accept abusive conduct or harassment – a policy made clear from the first day of employees' orientation. Employees are expected to report situations that compromise their ability to do their jobs. Formal channels are available for employees who seek advice or a solution, and our policies strictly prohibit retaliation against employees who express concerns. We manage our business operations so that employees feel they are being treated fairly and respectfully.

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Please see separate *Policy on Anti-Discrimination and Anti-Harassment*.

4.8 Diversity and Inclusion

SMIC is committed to be a high-performing organization built on the foundation of a diverse and inclusive workforce, with individuals and teams working to blend a wide range of talents, preferences, and perspectives in pursuit of shared purposes. Employees are expected to be open and open to honest dialogue and tolerant of others' differences.

4.9 Community and Stakeholders Engagement

SMIC is committed to associating with stakeholders who share our values of integrity, fairness, honesty, and respect for all individuals. Where appropriate, we engage with our communities on human rights matters that are important to them. Our aim is to ensure through dialogue that we are listening to, learning from, and considering their views as we conduct our business.

5. PROCEDURES

- 5.1 Employees can report incidents or complaints of workplace violation of the above policies verbally or in writing to the Head of Human Resource Department (HRD) or to the Compliance Officer (CO). When reporting, the reporting contact will fill out a complaint form detailing the following:
 - a) Name of the person who has allegedly experienced workplace violations of above policies and contact information.
 - b) Name of the alleged violator, position, and contact information, if known.
 - c) Names of the witness, if any, or other person with relevant information to provide about the incident, if any, and contact information, if known.
 - d) Details of what happened including date, frequency and location of the alleged incident. Any supporting documents the person who complains may have in their possession that are relevant to the complaint.
 - e) List any documents a witness, another person or the alleged violator may have in their possession that are relevant to the complaint.
- 5.2 An incident or a complaint of workplace violation should be reported as soon as possible after experiencing or witnessing an incident. This allows the incident to be investigated in a timely manner.
- 5.3 Head of HRD or CO should be immediately notified so they can ensure an appropriate investigation is conducted Depending on the nature of the allegations and the people

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involved, the report/complaint/incident may be referred to an external qualified investigator to conduct an impartial investigation.

- 5.4 All incidents or complaints of violations shall be kept confidential to the extent necessary to protect the employees, to investigate the complaint or incident, to take corrective action or otherwise as required by law.
- 5.5 The investigation must be completed in a timely manner and generally within 90 days or less unless there are circumstances (i.e. illness, complex investigation) warranting a longer investigation.
- 5.6 Within 10 days after the investigation is completed, the employee or person who allegedly experienced the violation and the alleged violator, if they are an employee of SMIC, will be informed in writing of the results of the investigation and any corrective action taken or that will be taken by SMIC to address workplace violation.