



Globe

Supplier Code of Ethics

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Version 3

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Supplier Code of Ethics

Globe Telecom, Inc. and its Subsidiaries

VISION

We see a Philippines where families' dreams come true, businesses flourish, and the nation is admired.

MISSION

We create wonderful experiences for people to have choices, overcome challenges, and discover new ways to enjoy life.

PURPOSE

In everything we do, we treat people right to create a Globe of Good.

CORE VALUES

We put customers first.
We value people and together, we make the difference.
We act with integrity.
We care like an owner.
We keep things simple.
We move fast, we are better, every day.

1. GOVERNANCE PRINCIPLES

As strong advocates of fairness, accountability, transparency, and integrity in all aspects of the business, Globe Telecom, Inc. and its subsidiaries (collectively, "Globe", "we") commit to the principles and best practices of corporate governance and responsibility in the attainment of our corporate goals and strategic direction.

2. SUSTAINABILITY GOALS

Globe recognizes the importance of institutionalizing sustainability practices in the pursuit of its goals. Guided by the Sustainable Development Goals of the United Nations and the Principles of United Nations Global Compact, Globe has initially identified three areas to focus on in order to create positive environmental and societal impacts. These focus areas are Care for Environment; Care for People; and Digital Nation.

We have embedded these thrusts into our Globe culture and we expect our vendors to have the same high standards in order to achieve sustainability throughout our value chain. We expect that this Supplier Code of Ethics ("Code") shall be accepted and supported by vendors of Globe. Globe prefers to transact business with vendors that uphold the same standards.

This Code provides the guidance and standards that we ask our vendors to support so that, together, we will be able to achieve the Globe Purpose, Governance Principles, and Sustainability Goals.

For the purposes of this Code, "suppliers" and "vendors" shall mean the same.

3. OUR COMMITMENT

Globe is committed to develop, practice, and promote supply chain policies and programs to care for the environment, care for people, and enable a digital nation. We strive to ensure that our supply chain reflects our priorities. We commit to our suppliers that we will:

- Act fairly and ethically,
- Be transparent with our processes,
- Provide equal opportunity to all suppliers,
- Enable the development and participation of local enterprises in the supply chain through upskilling, supplier development, creation of and access to appropriate business opportunities in the Globe Supply Chain,
- Collaborate with them in their sustainability journey.

4. EXPECTATIONS FROM THE VENDORS

Globe expects its vendors, including their subsidiaries or affiliate entities, to acknowledge, respect and uphold the following principles and guidelines:

4.1. HUMAN RIGHTS AND LABOR RIGHTS

Globe respects all internationally recognized human rights and labor rights such as those expressed in the Universal Declaration of Human Rights, UN Guiding Principles on Business and Human Rights, the International Labour Organization (ILO) Conventions, and the United Nations Global Compact. Globe expects its suppliers to uphold the same principles and standards and comply with applicable laws and international standards on human rights and labor rights including but not limited to following:

4.1.1 Security of Tenure - Globe expects its vendors to comply with the 1987 Philippine Constitution, Labor Code of the Philippines and other applicable laws on employee's rights to security of tenure.

4.1.2 Freely Chosen Employment - Vendors must prohibit any forced, bonded or indentured labor or involuntary labor.

4.1.3 Freedom of Association and Right to Collective Bargaining - Vendors are expected to recognize and respect the rights of employees to freely associate, organize and bargain collectively in accordance with applicable laws.

4.1.4 Child Labor - Child labor is unconditionally prohibited. Vendors are expected to comply with the applicable child labor laws and employ only workers who meet the applicable minimum legal age requirement.

4.1.5 Non-Discrimination - Vendors must comply with all applicable local laws concerning discrimination in hiring and in employment practices. There shall be no discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, or marital status in hiring and in employment practices such as promotions, rewards and access to training and career development.

4.1.6 Humane Treatment - Globe expects its vendors to support, respect, and ensure the protection of internationally proclaimed human rights and to ensure that they are not complicit in human rights abuses.

4.1.7 Wages and Benefits - Vendors must comply with the applicable laws and regulations on wages including those pertaining to minimum wages, compensation for overtime work, wages for piecework and other elements of compensation, and shall provide legally mandated benefits.

4.2. OCCUPATIONAL SAFETY AND HEALTH

Vendors must comply with the applicable laws and regulations on occupational safety and health. Vendors shall provide a safe working environment with the aim of preventing accidents, promoting overall well-being and minimizing exposure to health risks of its employees, agents, clients, guests and the public. When necessary, the vendor will provide personal protective equipment, appropriate tools, and training to perform their duties in a safe manner. Vendors are to strive to comply with applicable international occupational safety and health standards like ISO 45001 or its equivalent.

4.2.1 Occupational Injury, Illness and Accidental Death

Vendors shall have procedures and systems to prevent, manage, track and report occupational injuries and illnesses, accidental death, exposure of workers to chemical, biological and physical agents, and motor vehicle incidents. Such procedures and systems shall comply with all applicable laws and regulations, and include provisions to: a) encourage worker reporting; b) classify and record injury and illness cases; and c) investigate cases and implement corrective actions. Vendors shall provide its workers with appropriate treatment, welfare assistance and insurance for disability and accidental death.

4.3. ENVIRONMENT

Globe is committed to promote environmental sustainability to minimize the impact of its business operations, and by extension, the operations of its vendors, to the environment while safeguarding the health and safety of the public. Likewise, vendors are expected to align their operations with Globe's commitment in consideration of the environmental standard, as applicable, to the vendor's business. Vendors should take a precautionary approach to environmental and climate challenges, promote greater environmental responsibility, and encourage the development and diffusion of environmentally friendly technologies.

Vendors in service and manufacturing operations are expected to have in place or build a functioning Environmental Management System (EMS) in accordance with ISO 14001 or its equivalent, including strict compliance with all applicable environmental laws, permits and reporting requirements.

In line with Globe's commitment to have net zero Greenhouse Gas (GHG) emissions by 2050, vendors shall participate in Globe's goal through identifying, monitoring, and minimizing their greenhouse gas emissions. Vendors shall work to promote resource efficiency and circularity, minimize

wastes, and reduce consumption of resources including raw materials, energy and water, throughout all stages of the product life cycle.

Vendors shall mitigate environmental risks and impacts in procurement, operations/production and logistics activities.

4.4. GOVERNANCE AND ETHICS

The same standards that Globe upholds shall be expected from vendors at all times in all business interactions in the following aspects:

4.4.1. Disclosure and Privacy of Information

Vendors are expected to protect the confidentiality of information including but not limited to personal information, products, processes, technology, customers and would-be customers, financials, internal activities, and other information deemed proprietary or confidential of everyone that the vendors do business with. Vendors are expected to comply with the applicable laws on data privacy such as the Data Privacy Act of 2012 (Republic Act 10173) and its Implementing Rules and Regulations.

4.4.2. No Improper Advantage

All forms of corruption, extortion and embezzlement are strictly prohibited. Globe prohibits its employees, vendors including employees or representatives of its vendors, from offering or receiving bribe, employment, kickback, and/or any other similar incentives to/from entities they do business with in consideration of business or as an inducement for the award of business. The vendors shall comply with the Anti-Graft and Corrupt Practices Act of the Philippines (Republic Act 3019) and any other applicable anti-bribery or anti-corruption laws including rules and regulations of governmental authority.

4.4.3. Responsible Sourcing of Minerals

Vendors shall strive to take all steps within their powers, such as conducting due diligence, to ensure that tin, tungsten, tantalum, gold, and cobalt and other minerals from conflict areas do not enter their supply chain.

4.4.4. Business Integrity

Vendors are expected not to take unfair advantage through manipulation, coercion, concealment, misrepresentation of material facts or any other unethical dealing. Globe expects its vendors not to engage in collusions, price fixing or other unfair or illegal trade practices.

4.4.5. Protection of Physical and Intellectual Property

Intellectual property rights shall be respected and transfer of technology and know-how shall be done in a manner that is in accordance with the applicable laws which protects intellectual property rights. Vendors shall protect and responsibly use both the physical and intellectual assets of Globe, including its property,

technology, supplies and equipment when vendors are authorized by Globe to use such assets.

4.4.6. Conflict of Interest

Vendors shall avoid the appearance of or actual conflict of interests. Conflict of interest exists if the Vendor (a) is effectively owned or controlled by an officer or employee of Globe, or a relative within the fourth (4th) degree of consanguinity or affinity of any such officer or employee, or (b) is a former employer of an existing employee of Globe within two (2) years prior to the execution of relevant contract with Globe. If the vendor has knowledge of a conflict of interest with Globe prior to entering into agreement, the vendor shall immediately make full disclosure of the same to Globe and obtain Globe's written approval.

4.4.7. Gifts and Hospitality

Globe does not accept any type of gift or any offer of hospitality beyond that of nominal value. Globe will not accept any recreational trips to sporting or cultural events, theme parks or offers of holidays, transportation, accommodation or invitations to extravagant lunches or dinners. Vendors and/or its representatives shall refrain from giving Globe employees an individual gift or a combination of gifts, or providing any entertainment, that would violate the Globe Code of Conduct for its employees.

4.4.8. Insider Trading

Vendors shall not engage in insider trading by buying or selling Globe stocks or any other company's securities when in possession of information about Globe or another company that is not readily or publicly available to the investing public and that could influence an investor's decision to buy or sell stock.

4.4.9. Business Continuity

Vendors are expected to establish and maintain their respective business continuity plans or programs as appropriate to their business and corresponding to the criticality of the products and services offered to Globe. To the extent possible, vendors shall attempt to ensure that they have their Business Continuity Plans (BCP) and such BCPs are aligned with Globe's own BCP, and shall provide resources required to implement them.

4.4.10. Emergency Preparedness

Vendors shall identify and assess hazards and risks with potential emergency situations or events within their area of responsibility. Vendors shall have appropriate emergency plans and response procedures to comply with all applicable laws and regulations regarding emergency preparedness including emergency reporting, notification and evacuation and rescue procedures, training and drills, appropriate hazard detection and suppression equipment, adequate exit facilities and recovery plans.

4.4.11. Transparency

Open communication, transparency and a feedback mechanism to raise concerns on potentially unethical/unlawful behavior without fear of retribution are encouraged as this fosters integrity and, therefore, contributes to a sustainable supply chain.

4.5. ANTI-CUSTOMER BEHAVIOR

Vendors are expected to act with utmost professional courtesy towards Globe, its employees and representatives, and its customers. They are also expected to respond promptly, assist efficiently and attend to the concerns of Globe and/or its customers.

4.6. MANAGEMENT SYSTEM

The essence of this Code is in its implementation. Globe expects vendors to manifest their commitment in implementing the principles and guidelines in this Code by (a) establishing an appropriate management system to address compliance with and support to the set standards, detect and correct any non-compliance or failure to support, and (b) reporting the same to Globe. Vendors are encouraged to continually improve their environmental, social, and governance performance.

Further procedures will be issued to support this Code.

5. MONITORING AND EVALUATION

Globe may, at its sole option, appropriately assess on at least an annual basis the supplier's performance and potential risks that may arise from business practices of the supplier. Globe may conduct on-site evaluations and inspections of the vendor's facilities and records and those of their suppliers and subcontractors to review their adherence towards these standards and principles.

6. REPORTING IMPROPER CONDUCT

Vendors have the right and obligation to bring to the attention of Globe management any possible or observed pertinent violation of or failure to support this Code, Globe's policies and applicable laws. Vendors are encouraged to work with its Globe contact in resolving business practices' issues. Any questions related to this Code can be addressed to gtprocurement@globe.com.ph.

Any employee, supplier and third party may use the [Globe Whistleblower Network \(GWeN\)](#) portal or send an email to gtprocurement@globe.com.ph to raise compliance concerns or report suspected violations of this Code and other company's ethical standards by employees, officers and directors, and suppliers and partners. All reports are treated with confidentiality to ensure the safety of the whistleblower and parties involved as stipulated in our Whistleblower Policy.

Globe shall not tolerate any retribution or retaliation taken against any individual or entity who has in good faith sought advice or has reported questionable behavior or a possible violation of this Code or other company's ethical standards.



7. COMMUNICATION

Globe will disseminate this Code to all current and new suppliers for their guidance. Vendors are responsible for reading and implementing this Code.

8. RELEVANT POLICIES

Also read Code of Conduct, Human Rights Policy Commitment, Environmental Sustainability Policy, Health and Safety Policy, Sustainable Supply Chain Policy Commitment, Anti-corruption and Bribery Policy, Whistleblower Policy, Manual of Corporate Governance

Approved by: Ernest L. Cu, President and CEO
May 2023