



Code of **Business Conduct**

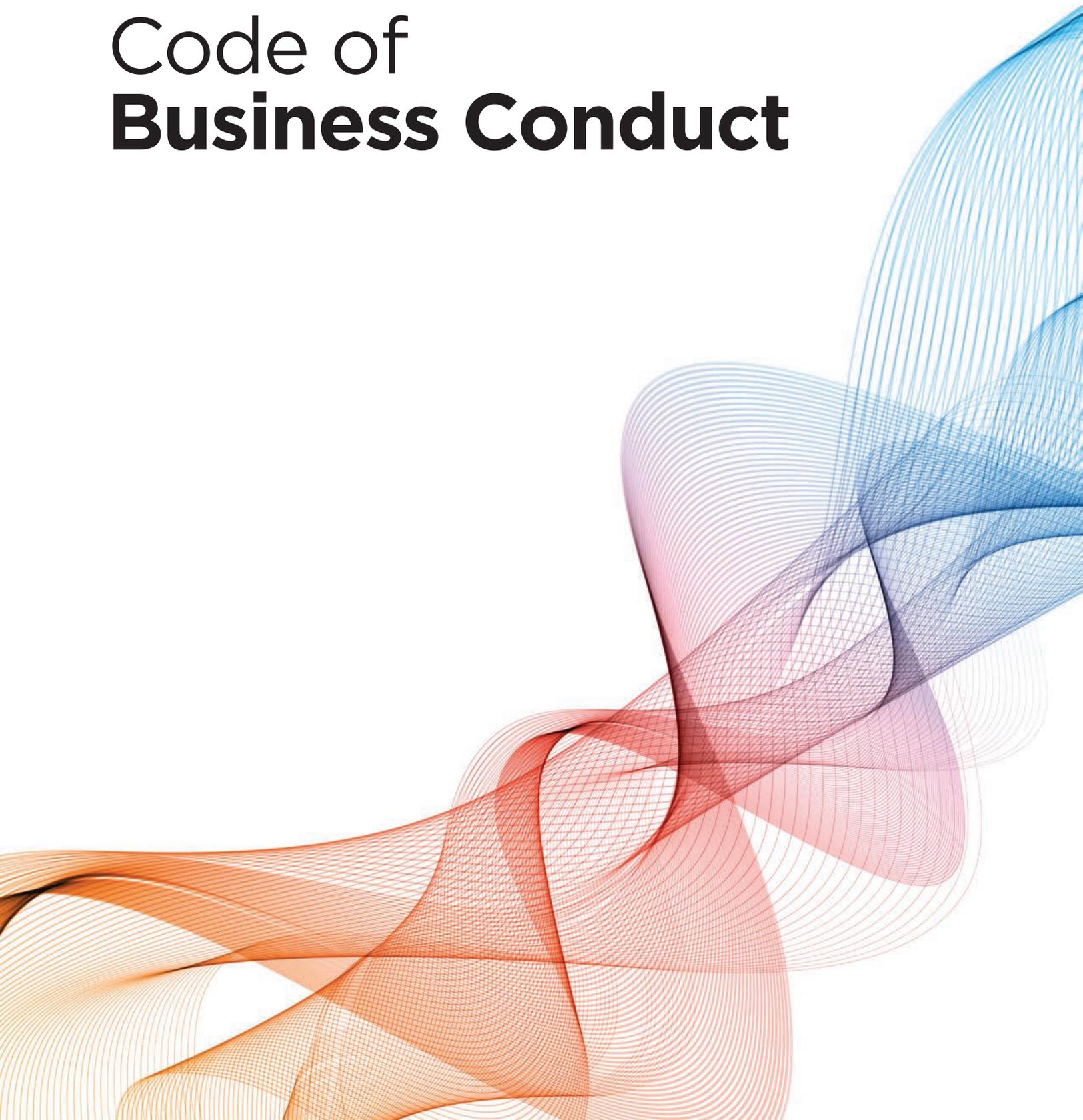


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MESSAGE FROM THE EXECUTIVE CHAIRMAN

Insular Life is a company that is proud of its history, heritage and achievements. We have reached more than a hundred years and flourished in an industry that heavily weighs on the trust of policyholders. We thrive, because we have always conducted our business with prudence, integrity, and loyalty to our Stakeholders.

Today, we operate in an ever-changing business environment with varying demands from customers, competitors, regulators as well as the pressure to increase profit. But as a mutual company, we are accountable to our policyholders and to our other Stakeholders and this accountability requires that our Company practices good governance at all times. The same good practices ensure that we continue to provide excellent products and services well into the future, and pursue strategic opportunities to sustain our growth.

This new Code of Business Conduct should serve as definitive guide posts to empower all our employees to act and make decisions with integrity, every day. I am confident that as InLifers, we are all aware that this is a responsibility we share, and therefore, we will ensure strict adherence to it.


Nina D. Aguas



MESSAGE FROM PRESIDENT AND CEO

Our Code of Business Conduct illustrates our commitment to doing good which is anchored on our core values of integrity and respect for individuals.

InLife is a leading insurance company. We are doing good for our policyholders by addressing their protection, investment and servicing needs in all touchpoints at all times.

InLife is a dependable employer. We are doing good for our employees by ensuring a safe, secure and healthy work environment; and implementing non-discriminatory practices in recruitment, career development and employee promotion.

InLife is a responsible corporate citizen. We are doing good for the country by complying with laws and regulations, and accomplishing development programs to help conserve a clean environment, and improve lives.

For us InLifers, doing good means bringing “A Lifetime for Good.”

mbdela Cruz

Mona Lisa B. Dela Cruz



About Us

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Instagram: [@insular_life](https://www.instagram.com/insular_life)



Mission

We are Insular Life, the pioneering and largest Filipino life insurance company. Our mission is to provide a full-range of high-value insurance products and other related services that empower families to attain financial security and fulfill their dreams, thus helping build a stronger Philippines.

We enable our professional, customer-oriented employees and agency force to render service of the highest quality.

We are experts in our core business, and we operate with excellence at all times to optimize stakeholder value.

We continuously pursue strategic opportunities, and achieve sustained growth through dynamic marketing, prudent investments, and exceptional service.

Vision

To be the market leader in the insurance industry to whom more Filipinos entrust the financial security of their families.

Our Core Values

LOVE OF GOD AND COUNTRY - We honor God by touching lives through sharing our financial, human and intellectual resources to our fellow Filipinos.

INTEGRITY - We acknowledge the confidence that the public, particularly our policyholders, places on us.

EXCELLENCE - We espouse a deep sense of responsibility for our work and seek continuous improvement of our people and processes.

PRUDENCE - We value the trust given to us and as such ensure that we exercise fiduciary care in all our dealings.

RESPECT FOR THE INDIVIDUAL - We recognize that every individual is unique and possesses a distinct worth which contributes to the organization's value.

TEAMWORK - We recognize that our success in business requires a commendable esprit de corps among our people.

OUR CODE

We, at Insular Life, do business with integrity and prudence. We value our reputation and good name. For us, striving to do the right thing to protect our stakeholders' interests is a primary concern. To do this, we follow the law, relevant regulations, company policies, and our Code of Business Conduct (Code).

Our Code provides general guidelines on how to exercise good judgment and how we translate Insular Life's Core Values into actions. THIS CODE INCORPORATES INSULAR LIFE'S POLICIES and applies to all employees of Insular Life. Thus, we are required to read, understand and abide by it.

Our Code has four main parts: Doing Good as a Corporate Citizen; Doing Good For the Business; Doing Good in the Workplace, and; Doing Good for the Stakeholders. At the end of this Code is the reporting section, Raising Concerns, showing how we can raise any concern or ask questions relating to this Code or any of the company's policies.

You may view the full text of the cited policy by clicking it. Other company policies and guidelines can be found in the E-library.



REMEMBER!

- ✓ We are all required to annually re-affirm our commitment and compliance to the Code.
- ✓ Any violation of the law, regulation, this Code or company policy shall be subject to disciplinary action.

OUR STAKEHOLDERS:

- Policyholder-Members,
- Agents,
- Employees,
- Community-at-large,
- Counterparties, and
- Regulators.

ETHICAL CONDUCT AND COMMITMENTS

Our ability to meet the expectations of our Stakeholders depends on upholding high standards of conduct. We are expected to always do the right thing, make decisions based on what is right and not what is simply easy or expedient. Thus, as an InLifer, we must:

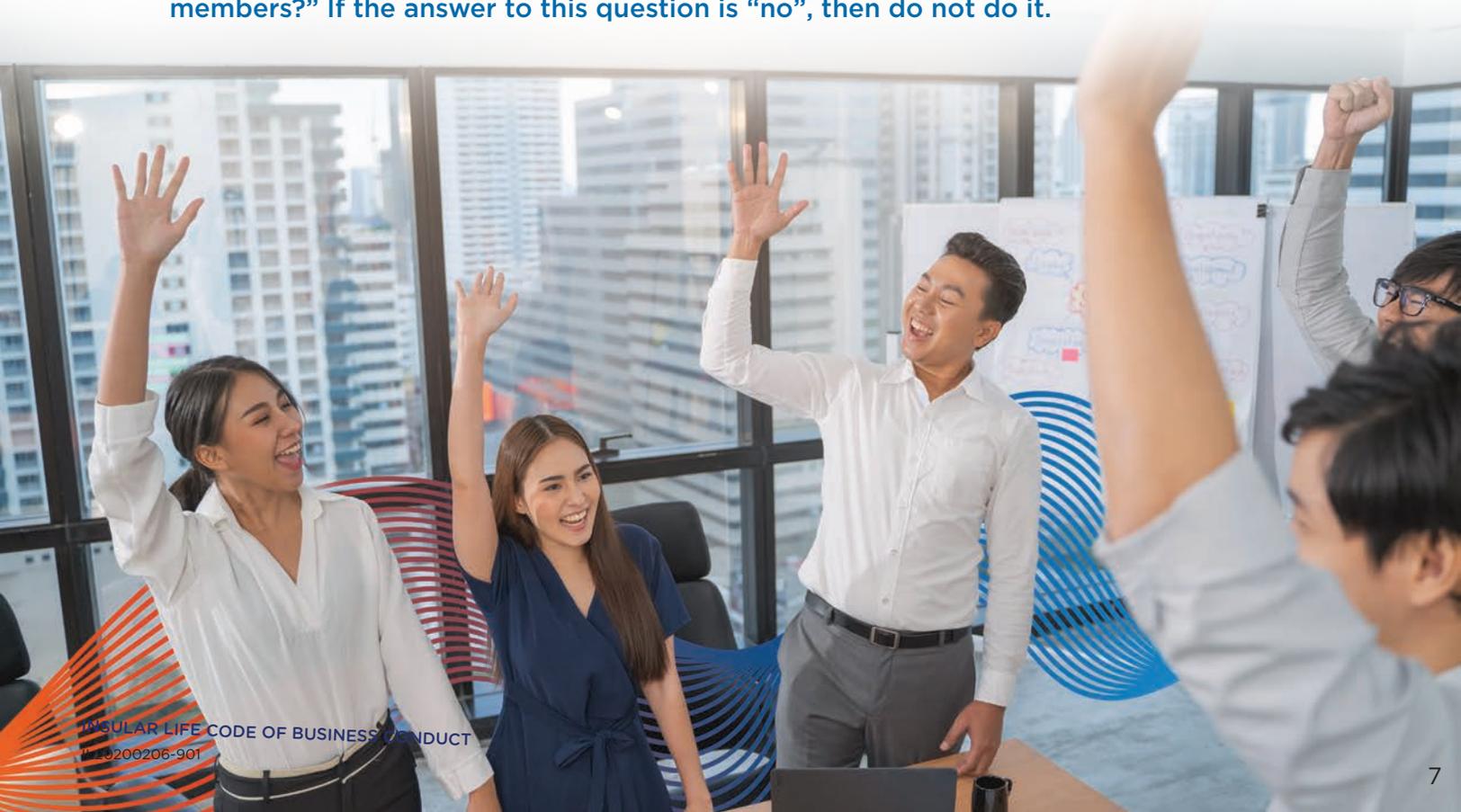
- ✓ Follow the law, regulations, this Code and company procedures.
- ✓ Use our Core Values to help us “do the right thing”.
- ✓ Make sure we are familiar with the Code and know how it applies to our roles.
- ✓ Speak up if we think the Code or the law has been breached in any way.
- ✓ Always attend and participate in Code-related trainings and learning sessions.
- ✓ Ask questions if we are not sure.

Those in supervisory positions play an additional role in promoting a work environment that upholds the Core Values of Insular Life. Thus, People Managers can help set the tone by:

- ✓ Serving as a model in practicing our Core Values.
- ✓ Understanding the Code and communicating its messages.
- ✓ Ensuring all supervised personnel are familiar with and understand the Code.
- ✓ Deciding based on facts and fairness regardless of internal or external pressures.
- ✓ Acting responsibly if a colleague tells you that our Code has been breached.
- ✓ Speaking up and raising concerns if you believe, detect or evaluate that others are breaching our Code or are not demonstrating our Core Values.

Don't forget, we are responsible for our own conduct.

If you are uncertain about the right course of action, ask this: “If I do the action, would I be comfortable if it came to the attention of my colleagues, friends or family members?” If the answer to this question is “no”, then do not do it.



Remember:

- Follow the law
- Act with integrity
- Comply with the Code
- Be accountable

DOING GOOD AS A CORPORATE CITIZEN

COMPLIANCE WITH LAWS, RULES AND REGULATIONS

As a business imbued with public interest, we are accountable to our Stakeholders. All of us must observe and comply with applicable laws, rules and regulations. As an insurance company, we are primarily governed by the Insurance Code of the Philippines and the regulatory issuances of the Insurance Commission. We also follow this Code, company procedures and guidelines.



What are the other laws that affect our operations?



Among others, the Revised Corporation Code, the Labor Code of the Philippines, the Anti-Money Laundering Act, The Counter Terrorist Financing Act, the Intellectual Property Code, the Data Privacy Act of 2012, Philippine Competition Act, and any amendment or supervening laws issued from time to time.

COMMITMENT TO COMMUNITY WELFARE AND ENVIRONMENTAL STEWARDSHIP

Insular Life is more than a business. We take great pride in generously sharing our talent, time, and compassion with others. We reach out to our less fortunate but deserving Filipino brothers and sisters. We care about the Filipino youth who are the nation's builders, we invest in their future through educational scholarships, grants, and financial literacy programs.

We also promote environmental stewardship through sustainable use of our natural resources to preserve them for future generations.



As an Inlifer, how can I demonstrate helping the community or caring for the environment?



I can volunteer and actively participate in community activities sponsored by Insular Life. I can also be a part of the programs of Insular Foundation, Inc.

DOING GOOD FOR THE BUSINESS

WORK EXCELLENCE

Ours is a business imbued with public interest. Thus, we are required to give our utmost dedication and commitment to our work for the benefit of our insuring public.

We are expected to demonstrate professionalism and accountability in everything we do. We continue to develop our skills to contribute in the achievement of our corporate goals. We ensure the delivery of commitments the Company made to its clients and partners. We strive to excel in all work-related activities.

FOR MY PART, I CAN DEMONSTRATE WORK EXCELLENCE BY:

- prudently exercising the authorities given to me.
- knowing the applicable and updated regulatory and operational requirements of my work and role.
- maintaining professional licenses and certifications.
- actively participating in achieving the Company's short and long-term objectives.
- setting higher goals.
- thinking big and never being satisfied with my achieved goals.
- accurately and timely submitting reports or requirements.
- courteous treatment of our customers.
- preventing occurrence of errors, delays or losses on the part of the Company in performing my job.
- making employment decisions - employment, promotion and career development - solely on the basis of job-related skills, achievements and performance.

MANAGEMENT AND HANDLING OF INLIFE ASSETS



Our Brand Promise

Our brand represents who we are and our purpose as an institution. It affirms our mission, commitment, and vision. The InLife brand shows our dynamism and capability to deliver insurance and financial solutions. It is one of our most valuable assets and strategic tools for achieving our business objectives. We must therefore use it with proper care.

For me, this means:

- Always following Company Guidelines on Insular Life's brand and seeking approval from the appropriate committee.
- Including the Insular Life name or brand in business communications.

For me, this means never:

- Using Insular Life letterhead on personal matters.
- Using Insular Life's brand in personal e-mails.



Upholding Fiduciary Responsibility

Insular Life as an insurance business has fiduciary obligations. We are required to operate our business with utmost honesty, integrity, and transparency for the benefit of our Stakeholders. We ensure that all company funds, properties, and other resources are properly protected and appropriately used at all times.

For me, this means:

- Timely, truthfully, and accurately stating, recording and accounting all Company transactions and company funds.
- Transferring or depositing cash/collection within the prescribed time.
- Timely, truthfully, and accurately liquidating expenses/cash advances.
- Recording all time and leave occurrences promptly and accurately.
- Prudently investing funds entrusted to us by our policyholders.
- Properly using all furniture, fixtures, and appliances in the company premises including staff houses.
- If my functions relate to the access to non-public/proprietary information, using the Company's facilities, time and resources solely for the benefit of the Company.
- Raising my concern if I have reason to believe that inaccurate or falsified records are being done or kept by other employees or they are misappropriating company funds.

For me, this means never:

- Using Insular Life staff, services, supplies, equipment, facilities or opportunities for private gain or for personal purposes or allowing others to do so.
- Using Insular Life's phone and e-mail systems for personal reasons.
- Using Insular Life's information systems to access, send, view, or download inappropriate, offensive, or illegal material.
- Destroying, removing or inappropriately using records, documents or properties of Insular Life.
- Conducting private business using Insular Life's time or resources.

At Insular Life, we do not tolerate:

- Robbery or theft committed against the Company, its employees, policyholders, agents, and other clients.
- Fraudulent conduct of bidding and/or awarding of contracts.
- Misappropriation or unauthorized use of Company funds and properties.
- Forging, altering or falsifying any personal or Company record/document used in business transactions/completion of requirements.
- False representation as to person or authority to the prejudice of the Company or any of its policyholders, agents, employees or other clients.



Keeping Information Secure

We work with information and materials which are confidential in nature. Some of them are even trade secrets. Our Company uses or relies upon them when making business decisions. Thus, it is very important to properly safeguard them and not disclose them to the public or outside parties unless properly authorized.

For me, this means:

- Always keeping my passwords secret and never sharing them with colleagues or others.
- Locking my screen or any devices when I leave my desk.
- Avoiding disclosure of proprietary or confidential information, unless specifically allowed to do so.
- Using a shredder when disposing confidential or official documents.
- Keeping confidential documents under lock and key.
- Abiding by the Company's POLICY ON CONFLICT OF INTEREST.
- Speaking up and filing a report whenever I see a colleague mishandling confidential or proprietary Insular Life information or document.

For me, this means never:

- Using public file sharing websites.
- Sharing Insular Life's confidential documents and information with or through the media or social network or similar platforms.
- Sharing Insular Life's confidential information without prior written approval from the concerned Group or Division Head.
- Sharing proprietary vendor information with other vendors or third parties unless there is a business "need to know" and with proper approval.
- Securing the promise of a future job based on what I learned working with Insular Life.



Intellectual Property

At Insular Life, we proudly create and develop exciting products and services. Our innovations give us a competitive edge. We must always take care and protect our intellectual property rights – designs, copyright, trademarks and trade secrets. We ensure that what is ours isn't copied or used by others without our agreement.

If we're involved in creating new product designs or ideas for Insular Life, we must always understand our brand guidelines and respect the intellectual property rights of others.

For me, this means:

- Always creating or sourcing original ideas, designs and products.
- When creating or developing new ideas, keep them confidential and talk to the Head of Legal about how to protect them.
- Consulting with the Head of Legal before allowing third parties to use our brands or other intellectual properties.
- My inappropriate use of works that are subject to intellectual property rights protection may result in disciplinary action.
- Raising my concerns if I see or know that another business has infringed upon our intellectual property rights.

For me, this means never:

- Copying or using other people's ideas without citing or crediting them or seeking permission if needed.
- Forgetting that examples of work that may be subject to copyright protection include logos, print and online publications, television and radio programs, videotapes, music performances, photo graphs, training materials, manuals, documentation, presentations, artworks, software programs and web pages.

FIGHTING FRAUD

Fraud is commonly used to describe causing injury or damage through a wide variety of dishonest behaviors such as deception, forgery, lying, and concealment of material facts. It is a serious crime that harms our business and can have a significant impact on our reputation and image.

As a fiduciary business, we must be alert to the risks associated with fraud. We act with integrity whenever and wherever we do business. It is also important that everyone understands our zero-tolerance approach to fraud. Everyone who works with us must also adopt the same zero-tolerance approach.



For my part, I can help prevent and detect fraud by:

- never doing business with companies with a reputation for fraudulent activity.
- conducting due diligence on our partners before engaging them, especially those that perform services on our behalf.
- immediately reporting fraudulent activities.

If I suspect that a fraudulent activity is taking place, I can report it in accordance with the Whistleblowing Policy of the Company.



Guide questions to check if fraud has been committed:

- Was there abuse of position for personal gain?
- Did the act involve dishonesty or deceit?
- Was there improper handling or reporting of money or financial transactions?

If the answer to any of these questions is “yes,” quickly report the matter to your Immediate Superior or use any of our Whistleblower platforms.

CONFIDENTIALITY AND DATA PRIVACY



Information and data are at the core of our business. They are confidential in nature and are owned by the Company. They include records of policyholders, agents, employees, as well as data from and relating to medical underwriting, claims, investigations, and audit.

Since these data or information are vital to the Company, used as bases for Management decisions, or are considered trade secrets, they are to be strictly safeguarded by all employees. We handle them carefully and do not disclose them without authority or written permission from our Group/Division Head.

How do I demonstrate compliance with data privacy principles?

I do this by:

- Always keeping my passwords secret and never sharing them with colleagues or others.
- Locking my computer or laptops when I leave my desk.
- Respecting the personal property of my co-workers.
- Never using collected data for personal benefit.
- Never disclosing confidential information to anyone else unless I am authorized to do so.
- Discussing any confidential information entrusted to me, only with co-employees who need to know it for the successful conduct of the Company's business.
- Abiding by the Company's DATA PRIVACY POLICY, INFORMATION SECURITY POLICY and INFORMATION TECHNOLOGY POLICY.
- Raising concerns if I believe that any type of information or data might have been misused, lost or be the subject of an unauthorized access or disclosure, following the Company's policy on Information Security and Data Privacy.



REMEMBER!

Our confidentiality obligation is perpetual and shall survive the termination of our employment with the Company.

The protection of confidential/proprietary information is one of the major bases for the continuing relationship, anchored on trust and confidence, between the Company and its employees.

CONFLICT OF INTEREST

Conflict of interest occurs when an employee is able to exploit his own professional or official capacity in some way for personal benefits.

Thus, all actions and decisions of an employee in the conduct of his day-to-day affairs, most especially as they relate to the Company's business operations, must be made solely in the best interest of the Company.

Avoiding all situations where the appearance of a conflict might exist and asking myself how an outsider would view it.

Tell my Immediate Superior, as soon as possible, if I feel that I might have a potential conflict of interest.

Disclosing my conflict of interest and removing myself from the decision-making process.



REMEMBER!

Having a conflict of interest does not necessarily mean you've done something wrong. However, you must promptly disclose the conflict to avoid potentially serious consequences. Thus, you should always be aware of any personal interests, activities, or relationships that might give rise to a conflict of interest.



SAMPLES OF CONFLICTS OF INTEREST

- Employment outside of Insular Life.
- Assumption of Government Position.
- Having a business interest that competes with the business of the Company.

ANTI BRIBERY AND CORRUPTION

Here in Insular Life, we do not tolerate bribery and corruption. We ensure that all our business dealings are honest, above-board, transparent, and in accordance with law.

How do I demonstrate compliance with the Company's Anti-Corruption Policy?

- I never accept gifts or entertainment that might influence my business decisions.
- I refuse gifts or entertainment that may be construed as a bribe or carry an expectation in return.
- I am mindful of the bribery/corruption risks posed by engaging with public officials and I make sure that our engagements with them are always open, honest, and transparent.
- I will abide by the Company's POLICY ON CONFLICT OF INTEREST and ANTI-CORRUPTION POLICY.
- I forward to my Group Head for evaluation/approval any invitation for orientation and courses required in a business relationship.



PROPER USE OF TECHNOLOGY

Modern technology tools, such as internet, information systems, computers, laptops, or wi-fi, bring plenty of business opportunities for Insular Life. They allow us to innovate and adapt, thereby ensuring our competitiveness. We take advantage of technology to facilitate and deepen our relationships with our Stakeholders. We are, therefore, careful and prudent in using these business tools.

I demonstrate proper use of technology by:

- Never sharing my passwords.
- Installing only Company-licensed software.
- Using Insular Life's technology tools mainly for business reasons.
- Never using Insular Life's information systems to access, send, view, or download inappropriate, offensive, or illegal material.
- Using Insular Life's information only for approved and work-related purposes.
- Following our INFORMATION SECURITY POLICY and IT POLICY.
- Helping prevent unauthorized access to, or disclosure of, information.

MANAGING BUSINESS RISK

Risk management is an integral part of our operations. As we explore opportunities and initiatives to create and develop products and improve our customer service, everyone strives to maintain the balance between the risks and the returns of all our undertakings.



DOING GOOD IN THE WORKPLACE

PROPER OFFICE DECORUM

As representatives of Insular Life, we conduct ourselves in a professional manner.

We are reliable and competent and dedicated to our work. We treat our colleagues, policyholders, customers, agents and partners with courtesy, fairness and professionalism.



I also demonstrate proper office decorum by:

- Respecting my colleagues.
- While in company premises, not engaging in a fight or instigating a fight, threatening, assaulting or inflicting harm or injury to others, or doing any act of physical or verbal violence committed against another person.
- Not loitering or selling merchandise during office hours.
- Not gambling in whatever form.
- Smoking or vaping only in designated areas.
- Never spreading malicious rumors or gossip.
- Never making false and malicious statements.
- Observing proper work hours and break periods. Refer to the Company's Time and Attendance Policy.
- Wearing the proper uniform or office attire during official work hours on regular business days.
- Refraining from entertaining personal visitors during office hours in Company premises.
- Being accountable for my own actions and taking appropriate steps to rectify my lapses.
- Speaking up when I see a colleague failing to demonstrate proper office decorum.



PROMOTING SAFE, SECURE AND HEALTHY WORK ENVIRONMENT



Personal Safety and Security

Here in Insular Life, we ensure the safety, security and general well-being of every employee because we believe these boost work productivity. We ensure personal safety and security by complying with health and safety laws, continuing to improve the company's wellness programs, and pro-actively engaging employees to be a partner in guaranteeing our safe, secure and healthy work environment.

Harassment-Free Work Environment

We are a company that treats everyone with respect. We have zero-tolerance for abusive or inappropriate behavior in the workplace in any form. We all share in the responsibility for making sure that Insular Life offers a safe and dignified work environment.

Dangerous Drug and Alcohol-Free Work Environment

Dangerous drugs or alcohol can impair one's ability to perform one's job safely, efficiently and with respect for colleagues and customers. The use of such substances may result in injury or damage to another or members of the public. We want an employee to attend work in a fit state and not under the influence of alcohol or dangerous drugs. Also, we do not tolerate involvement with the manufacture, possession, use, distribution, sale, purchase, or transfer of dangerous drugs.

As an InLifer, I will:

- never bring any weapon or explosives in the office.
- understand, practice and follow OCCUPATIONAL SAFETY AND HEALTH STANDARDS.
- participate in fire and earthquake drills.
- Report any health or safety concern to the OSHS Committee or to a safety officer.

- treat everyone as I would like to be treated.
- refrain from making inappropriate jokes or comments.
- practice gender sensitivity.
- never spread malicious rumors or gossip.
- never make false and malicious statements.
- make sure that my conduct is respectful when I attend events and social outings.
- report if I know someone might be responsible for an abuse or harassment.

- never come to work or perform work related activities under the influence of alcohol, or dangerous drugs (unless it is considered a health requirement).
- participate in company-initiated drug testing.
- ensure that counterparties do not use or possess alcoholic beverages or dangerous drugs in Company premises.
- abide by the Company's POLICY ON DRUG-FREE WORKPLACE.
- report if someone is violating this rule on dangerous drug and alcohol-free work environment.

Sexual Harassment-Free Work Environment

We value and respect the dignity of every individual. To this end, we have zero-tolerance towards all forms of sexual harassment in the work environment.

At Insular Life, we take allegations of sexual harassment seriously. Anyone experiencing and reporting such unwelcome behavior is assured that the matter will be handled with the utmost sensitivity and confidentiality.



THE ROLE OF MANAGERS AND SUPERVISORS:

- Clearly communicate in words and deed that sexual harassment is not acceptable.
- Never excuse or minimize sexually harassing behavior.
- Take reasonable measures to ensure that your colleagues aren't placed in situations where they might be sexually harassed.
- Abide by the Company's POLICY ON ANTI-SEXUAL HARASSMENT.
- Bring complaints and concerns of sexual harassment to the attention of Human Resources Division.
- Support staff members who express concerns about sexual harassment, including those committed by counterparties.



Promoting Fairness and Diversity in the Workplace

We treat everyone fairly and value the contribution of every employee, regardless of age, gender, disability, religion, or political belief. Our positive attitude on diversity and inclusivity applies to our interactions with policyholders, customers, agents, partners, and the communities we serve.



As an InLifer, I practice inclusiveness by:

- Helping create an environment of collaboration and promoting teamwork.
- Demonstrating respect for others, regardless of social or cultural differences.
- Confidently voicing our views and concerns through appropriate and relevant channels so that we can all work together to make Insular Life a great place to work.
- Reviewing performance based on merit and business considerations. Being constructive.
- Supporting initiatives to improve employment levels and skills where this is needed.
- Reporting if I see a colleague who is not practicing fairness and inclusiveness in the workplace.

Discrimination-Free Workplace

Discrimination is the unjustifiable differentiation between individuals based on age, gender, language, physical ability, religion, political opinion, social background. Examples of discrimination include:

- Using slurs, cultural jokes, negative stereotyping.
- Denying equal access to employment or career development opportunities.
- Creating or allowing a hostile or offensive work environment.



Avoidance of acts of discrimination and harassment is a continuing condition of employment for every employee.

DOING GOOD FOR THE STAKEHOLDERS

FAIR AND PROFESSIONAL DEALINGS WITH OUR SALES AGENTS

Our Sales Agents are vital to our business. They are our ambassadors in providing full range of high-value insurance products and in rendering professional service of the highest quality. We treat them with respect and professionalism, regardless of rank, age, gender, disability, religion, or political belief.

FAIR AND TRANSPARENT DEALINGS WITH BUSINESS PARTNERS AND SUPPLIERS

We only work with capable and competent business partners and suppliers who share our commitment to our Core Values and to the principles of good corporate governance. Accordingly, we screen our business partners and suppliers to ensure competency and genuineness of their commitment. Adherence to our Anti-corruption, Related Party Transactions and Data Privacy Policies are conditions of our supplier agreements.



For me, these mean:

- Following the company policies on Anti-corruption and Related Party Transactions.
- Being courteous but firm in dealing with partners and suppliers.
- Carefully considering which suppliers I place business with - price should not be the only factor: quality, reliability and ethical responsibility are important considerations too.
- Ensuring that they are aware of our core values, anti-corruption policy, bidding procedures and Related Party Transaction policy.
- When talking to or visiting counterparties, being alert to potential problems such as unsafe working conditions or abusive behavior.

FAIR AND PROFESSIONAL TREATMENT OF CUSTOMERS

At the heart of our business is our customers. Their trust and loyal patronage are invaluable to Insular Life. We provide them with quality high-value insurance products and we fulfill our contractual agreements. We treat them with professionalism and excellent customer service. In providing service, our customers trust us with their information. It is our duty to safeguard their information as required by law.



For me, it means:

- Never engaging in unfair, deceptive or misleading practices.
- Always presenting Company products in an honest and professional manner.
- Never acting in any way that may be perceived as improper or as giving you or the Company an unfair advantage.
- Keeping all information confidential.
- Raising concerns if I know anyone who is not treating our customers as they should be treated.



RAISING CONCERNS

When our colleague breaches this Code or our workplace environment does not embody Insular Life's Core Values, we undermine stakeholder relationships, we contribute to the lowering of general morale among InLifers, promote operational inefficiency and even damage Insular Life's good reputation.

To prevent or to minimize any damage resulting from these consequences, Insular Life employees are strongly encouraged to ask questions, speak up, and raise concerns. InLifers have the responsibility to report suspected, attempted or actual breach of the law, regulation, this Code or company policies.

Unless specifically stated elsewhere in this Code, any employee can raise any concern or report any breach of this Code or company policy to any of the following:

1. Immediate Superior
2. Head of Legal
3. Compliance Officer
4. Head of Audit

WHISTLEBLOWER PROTECTIONS

Insular Life's WHISTLEBLOWING POLICY provides a safe environment for reporting and addressing suspected or actual wrongdoing. The Company ensures, to the extent legally possible, that all reports, the identity of the Whistleblower - if known, and the result of any investigation are kept confidential.

PROTECTION AGAINST RETALIATION

Retaliatory action is any adverse action by the company against a whistleblower which includes undue dismissal, undue suspension, harassment, blacklisting or other adverse employment-related actions. Any employee who in good faith raises a concern and is not the most guilty is protected from retaliation. However, abuse of the retaliation protection extended by the company to malign any person's reputation will be actionable.



By the way...

failure to read the Code does not excuse an employee from compliance with the Code.

Sometimes ignorance or a simple lack of knowledge results in wrongdoing. If in doubt, always seek guidance.



Confirm and be Counted!

To confirm that you've read and understood the Code, please click this [link](#).



www.insularlife.com.ph