

VERSION NO. 1	MANUAL TITLE SUSTAINABILITY POLICIES	DOCUMENT NO. SUST-POL-013
	DOCUMENT NAME ANTI-CORRUPTION & ANTI-BRIBERY POLICY	REVISION NO. 0
		EFFECTIVITY DATE SEPTEMBER 07, 2026
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1.0 INTRODUCTION

D.M. Wenceslao & Associates, Inc. (DMW) is committed to conducting business with integrity, transparency, accountability, and ethical responsibility.

DMW adopts a zero-tolerance approach to bribery, corruption, fraud, extortion, kickbacks, and other unethical business practices. The Company seeks to conduct all business activities fairly and in compliance with applicable laws, regulations, and recognized standards of ethical conduct.

This Policy establishes DMW's commitments, expectations, and controls relating to anti-bribery and anti-corruption practices and supports the Company's objective of maintaining a culture of integrity throughout its operations and business relationships.

2.0 ANTI-BRIBERY AND ANTI-CORRUPTION COMMITMENTS

2.1 General Commitment

- 2.1.1 DMW prohibits bribery, corruption, kickbacks, facilitation payments, extortion, fraud, and any improper financial or non-financial inducements.
- 2.1.2 Employees and business partners are expected to conduct business in accordance with the highest standards of honesty, integrity, professionalism, and ethical conduct.
- 2.1.3 DMW seeks to prevent actual or perceived conflicts between personal interests and Company interests.

2.2 Prohibited Conduct

- 2.2.1 DMW prohibits the direct or indirect:
 - Offering, promising, authorizing, giving, soliciting, or accepting bribes.
 - Offering or accepting money, gifts, favors, services, hospitality, or other benefits intended to improperly influence decisions or obtain unfair advantages.
 - Providing or receiving kickbacks or improper commissions.
 - Misappropriation of Company assets, funds, or resources.
 - Concealment of fraud, corruption, or unethical conduct.
 - Acts of extortion, coercion, or improper influence.

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3.0 GIFTS, HOSPITALITY, AND ENTERTAINMENT

3.1 Appropriate Business Courtesies

- 3.1.1 DMW recognizes that reasonable and customary gifts, hospitality, entertainment, and business courtesies may form part of legitimate business relationships.
- 3.1.2 Any gift, hospitality, entertainment, or business courtesy offered, received, or exchanged must be lawful, appropriate, transparent, and consistent with ethical business conduct.
- 3.1.3 Such benefits shall not be intended to improperly influence, or appear to influence, a business decision, regulatory action, procurement process, or other official activity.

3.2 Prohibited Gifts and Benefits

- 3.2.1 Employees and business partners shall not offer, solicit, or accept gifts, hospitality, entertainment, or other benefits where such actions may create an actual or perceived conflict of interest or improper advantage.
- 3.2.2 Cash payments, cash equivalents, or excessive benefits intended to influence business decisions are prohibited.

4.0 POLITICAL CONTRIBUTIONS

4.1 Political Contributions

- 4.1.1 DMW maintains political neutrality in the conduct of its business activities and does not ordinarily make political contributions on behalf of the Company.
- 4.1.2 Any political contribution, should one be contemplated, shall be subject to applicable laws, internal approvals, and appropriate governance controls.

5.0 CHARITABLE CONTRIBUTIONS AND SPONSORSHIPS

5.1 Legitimate Contributions

- 5.1.1 DMW may support legitimate charitable, environmental, educational, community, or social initiatives.
- 5.1.2 Charitable contributions and sponsorships shall be transparent, properly authorized, and consistent with the Company's values and sustainability objectives.

5.2 Prohibited Use

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5.2.1 Charitable contributions and sponsorships must not be used to obtain improper business advantages or conceal bribery, corruption, or unethical conduct.

5.2.2 Contributions shall not be made in exchange for preferential treatment or business opportunities.

6.0 CONFLICTS OF INTEREST

6.1 Disclosure

6.1.1 Employees are expected to disclose actual, potential, or perceived conflicts of interest that may affect their judgment, objectivity, or responsibilities.

6.1.2 Conflict of interest situations may include personal, financial, family, business, or other relationships that may improperly influence decision-making.

6.2 Management of Conflicts

6.2.1 Identified conflicts of interest shall be appropriately reviewed and managed in accordance with Company procedures.

6.2.2 Undisclosed conflicts of interest may result in disciplinary or corrective actions.

7.0 TRAINING AND AWARENESS

7.1 Employee Awareness

7.1.1 DMW seeks to promote awareness of anti-bribery and anti-corruption expectations throughout the organization.

7.1.2 Employees may receive communications, awareness activities, guidance, or training relating to:

- Anti-bribery requirements
- Anti-corruption obligations;
- Ethical business conduct;
- Conflicts of interest;
- Reporting obligations; and
- Applicable Company policies

8.0 REPORTING CONCERNS AND INVESTIGATIONS

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8.1 Reporting Violations

- 8.1.1 Employees and stakeholders are encouraged to report suspected bribery, corruption, fraud, conflicts of interest, unethical conduct, or related concerns through the Company's reporting and whistleblowing mechanisms.
- 8.1.2 Managers and supervisors are expected to take appropriate action or report suspected violations of this Policy.

8.2 Investigation

- 8.2.1 Reported concerns may be reviewed and investigated in accordance with the Company's Whistleblowing Policy and other applicable procedures.
- 8.2.2 Investigations shall be conducted fairly, objectively, and confidentially.
- 8.2.3 Appropriate functions may participate in investigations depending on the nature of the matter involved, and corrective actions may be implemented where necessary.

9.0 CORRECTIVE ACTIONS AND DISCIPLINARY MEASURES

9.1 Corrective Actions

- 9.1.1 Where violations or weaknesses are identified, DMW may implement corrective actions, process improvements, control enhancements, remediation measures, or other management actions.

9.2 Disciplinary Measures

- 9.2.1 Violations of this Policy may result in disciplinary action, contractual remedies, suspension, termination of employment, termination of business relationships, legal action, or other measures as appropriate.
- 9.2.2 Suppliers and business partners found to have engaged in bribery, corruption, fraud, or other serious ethical violations may be subject to sanctions, including termination of contracts or business relationships.

10.0 SUPPLIERS AND BUSINESS PARTNERS

10.1 Suppliers and Contractors

- 10.1.1 DMW expects suppliers, contractors, consultants, intermediaries, and service providers to comply with applicable anti-bribery and anti-corruption laws and regulations.

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10.1.2 Suppliers and contractors shall not directly or indirectly offer, solicit, or accept improper payments, gratuities, kickbacks, or other benefits intended to influence business decisions.

10.2 Business Partners

10.2.1 DMW seeks to promote ethical business conduct among tenants, joint venture partners, investors, consultants, customers, and other business partners.

10.2.2 Business partners are encouraged to support standards consistent with this Policy and other relevant governance documents.

11.0 GOVERNANCE AND ACCOUNTABILITY

11.1 Responsibility

11.1.1 Relevant departments are responsible for supporting implementation of this Policy within their respective areas of responsibility.

11.1.2 Relevant departments may contribute to implementation, awareness, monitoring, investigations, and corrective actions.

11.1.3 Senior Management oversees implementation of this Policy and supports the promotion of ethical business practices throughout the organization.

12.0 GOVERNANCE AND REVIEW

12.1 Legal Compliance and Best Practice

DMW complies with applicable anti-bribery, anti-corruption, anti-fraud, and ethical conduct requirements and seeks to adopt recognized governance best practices where appropriate.

12.2 Monitoring and Continuous Improvement

The Company periodically reviews anti-bribery and anti-corruption controls, practices, awareness initiatives, and related governance mechanisms to support continual improvement.

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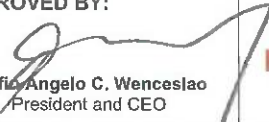
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12.3 Management Oversight

Senior Management oversees implementation of this Policy and promotes a culture of integrity, accountability, transparency, and responsible business conduct.

12.4 Annual Review

This Policy shall be reviewed annually and updated as necessary to reflect changes in business operations, legal requirements, governance expectations, and emerging best practices.

PREPARED BY:  Antoinette Marie M. Baltazar Asst. Sustainability Manager	APPROVED BY:  Delfio Angelo C. Wenceslao President and CEO	MASTER COPY	
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