



Anti-Bribery and Corruption Policy

1. COVERAGE

This Anti-Bribery and Corruption Policy (“Policy”) applies to all directors, officers, employees, third-party business partners, and other stakeholders of AREIT, Inc. (“AREIT” or the “Company”).

2. STATEMENT OF POLICY

The Company upholds the principles of honesty, integrity, and transparency in conducting business. In line with this, the Company strictly prohibits any form of corruption and bribery within the Company and dealing with its business partners, suppliers of goods and/or services, customers, and government agencies.

3. DEFINITION OF TERMS

- 3.1 **Bribery** refers to the offering, suggesting, promising, paying, authorizing, or accepting a payment to a public official or a private sector representative for their own or another’s personal gain with the intent to motivate active or passive deviation from duty or to secure the performance of an obligation.
- 3.2 **Corruption** is the state or circumstance that occurs due to offering, soliciting, authorizing, or providing a bribe. Extortion, fraud, deception, collusion, cartels, embezzlement, money laundering, and other similar activities are examples of misuse of entrusted power or authority for personal gain activities and shall likewise be considered as corruption. The preceding list is by no means exhaustive.
- 3.3 **Public Official** refers to any government official or employee, including those recruited, appointed, or elected to execute activities or functions in the name of a state or the government. Any official or agent of a public international organization, private persons performing official state functions, and officials of state-owned or government-owned and controlled corporations (“GOCCs”) are also considered Public Officials.

4. POLICIES AND PROCEDURES

- 4.1 All directors, officers, and employees must be familiar with and, at all times, act in compliance with this Policy, with Republic Act No. 3019 (Anti-Graft and Corrupt Practices Act), and will all applicable corruption laws and regulations where their work or services are performed.
- 4.2 This Policy applies to all actions and operations of AREIT and its affiliates, regardless of their jurisdiction, place of operation, or business. All covered parties must read, understand, and follow this, Policy. This Policy must be rigorously adhered to in any public and private setting, including dealing with customers, suppliers of goods and/or services, business partners, and counterparties of the Company, and the government, its agencies, and offices.
- 4.3 This Policy should be read in conjunction with the Company’s Core Values, Corporate Governance Manual, Director and Employee Codes of Business Conduct and Ethics, Conflict of Interest Guidelines, Policy on Business Gifts and Gratuities, and other Policies. Other rules within the Company, such as Whistleblowing Policy, may compel reporting of potential or actual violations of law, regulation, or Policy. Nothing in this Policy is intended to limit an employee’s rights or any possible safeguards.



- 4.4 Anyone who knowingly assists, abets, hides, or otherwise allows the conduct of any irregular, illegal, or fraudulent act intended against AREIT will be held accountable alongside the primary perpetrators of the fraud, unlawful act, or irregularity.

5. REPORTING

Any act, attempt, or allegation of Bribery or Corruption will be taken seriously and immediately dealt with, consistent and compliant with the pertinent rules/laws on procedural due process. The provisions of applicable laws, rules and regulations, and existing Company policies will guide AREIT in dealing with any case of Bribery and Corruption, including but not limited to Company's By-Laws, Corporate Governance Manual, the Employee Code of Conduct and Discipline, the Revised Penal Code, and special penal laws of the Philippines. Any act or attempt by directors, officers, employees, or third-party business partners or AREIT to commit Bribery or Corruption should be reported to any of AREIT's Business Integrity Channels as defined in the Business Integrity Program and Whistleblowing Policy.

6. EFFECTIVITY OF THE POLICY

This Business Integrity Program, approved by the Board of Directors on the 24th of February 2023 shall be effective immediately.

A handwritten signature in black ink, appearing to read 'J. H. Jalandoni'.

JOSE EMMANUEL H. JALANDONI
Chairman

A handwritten signature in black ink, appearing to read 'Ma. Teresa R. Famy'.

MA. TERESA R. FAMY
Chief Compliance Officer