

NOVO ECIJANO TEACHERS' MUTUAL BENEFIT ASSOCIATION, INC.

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**POLICY IN
ANTI-CORRUPTION**

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POLICY IN ANTI-CORRUPTION

It is imperative for the Association to conduct all of its business in an honest and ethical manner. It takes a zero-tolerance approach to bribery and corruption and is committed to act professionally, fairly, and with integrity in all of its business dealings and relationships, wherever it operates, and implement and enforce effective systems to counter bribery.

The policy applies to all individuals working at all levels, including Members, Trustees, Officers, Employees, Consultants, Independent Contractors, members of government agencies where the Association reports to.

All parties dealing with the Association shall be required to certify that they would adhere to this Policy and not indulge or allow anybody else working in their organization to indulge in corruption and bribery and would apprise it of any act or suspected act as soon as it comes to their actual or constructive knowledge.

Any concerns about any issue or suspicion of corruption and bribery shall be raised immediately to the Compliance Officer or Chief Audit Executive of Association and shall follow the procedure of either the Whistle Blowing Policy or the processes contained in the respective Company's Employees' Code of Conduct and Ethics, whichever is applicable.

Dissemination of this policy shall form part of the orientation process for all new Directors, Officers and Employees.

Any Employee caught and found guilty of violating this Anti-Corruption Policy shall be subject to appropriate disciplinary action as described in the Employees' Code of Conduct and Ethics, up to and including termination of employment.

This policy shall take effect immediately and shall supersede all existing policies inconsistent with the intention and mandate herein stated.