



**WATERFRONT**  
HOTELS & CASINOS

CODE OF BUSINESS CONDUCT & ETHICS





## WATERFRONT HOTELS AND CASINOS CODE OF BUSINESS ETHICS POLICY MANUAL ON BUSINESS CONDUCT

The purpose of this Code of Business Ethics and Policy Manual on Business Conduct (the “Code and Policy Manual” or simply the “Code”) is to define the relationships, which Waterfront Hotels and Casinos, (the Company) expects to exist with its directors, officers and employees (individually, the “employees” and collectively, the “employees”) and between its employees and its clients, suppliers, competitors, stockholders and the society.

The Code and Policy Manual applies to all directors, officers and employees of Waterfront Hotels and Casinos and all of its wholly or majority owned companies. The term *officers* cover directors and managers of Waterfront Hotels and Casinos and department heads and managers, while the term *employees* include the staff of Waterfront Hotels and Casinos, the rank and file and supervisory employees of the Hotel. In addition to the Code of Business Ethics and the Policy Manual for Business Conduct, directors are expected to comply with the Corporate Governance Guidelines adopted by the Board of Directors.

All staff of Waterfront Hotels and Casinos is subject to this Code of Conduct. Any breach of the Code will give rise to disciplinary, civil and/or criminal action.

Any staff member who has any doubt, propriety or any course of action or who finds that his interest are or may be in conflict with that of the company should seek the advice of the hotel PRDD/PSM. Any queries regarding the contents of this Code of Conduct should be directed to the Corporate Peers’ Resources & Development Director (CPRDD) of Waterfront Hotels and Casinos Management.

### PERSONAL CONDUCT

It is the duty of each Waterfront peer to avoid actual or potential conflict of interest. How we act and conduct ourselves should be within the realm of professional responsibility. In conflict of interest includes conflict of opportunities such as insider trading and political involvement. When conflict of interest is present or potentially present, it should be dealt according to our penalties and disciplinary actions found in this Handbook. All business must be conducted solely for the interest of the Hotel.

### CONFLICT OF INTEREST

Directors, officers and employees are expected to make business decisions based on the best interest of the Company. A conflict of interest which exists whenever:

- A) Your independent judgment may be influenced because of a direct or indirect personal interest, benefit or gain;
- B) Misuse of your position at the Company in a way that results in a direct or indirect personal benefit or gain.

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You have the obligation to disclose a conflict of interest or any potential conflict of interest. The Compliance Officer or the Board of Directors will determine what course of action to follow depending on the nature and extent of the conflict, including whether to extend waiver or divest of the conflicting interest, return the benefit or gain received, or realign duties and responsibilities.

From time to time, the Company will solicit information from certain employees to ensure that no conflicts of interest exist.

### **NON-COMPETITION**

An Employee will not seek full time job, or be involved in any way with any of the clients or competitors of the company either directly or indirectly during his/her employment with the company and for a period of one (1) year after separation from the company. The employee is required to commit that he/she will not enter into any business of similar nature, as owner, partner, employee, significant investor, independent contractor, or any other form of line of work that makes them our competitor by using the confidential information of the company's business.

### **PERSONAL INTEREST AND OUTSIDE BUSINESS**

An employee shall avoid pursuing private interests that interfere or appear to interfere with the interest of the Hotel or restrict the performance of one's job.

Profiting or helping others to profit from confidential information or business opportunities that are available because of employment with the Hotel.

Providing service to a competitor, a proposed or present supplier or customer. Employees with full-time position in the Hotel shall make its employment to the company its primary responsibility. Other employment outside the Hotel is secondary and must not interfere with one's ability to perform its job duties or create a conflict of interest.

Ownership or interest in a competitor or any business of the company has or contemplating a relationship with, directly or indirectly is conflict of interest.

Influencing or any attempt to influence a business transaction between the Hotel and a company with whom the employee has a personal interest with or on, such as an owner, board of director, officer, partner, agent or consultant shall be regarded as conflict of interest.

### **PERSONAL LIABILITY**

You should not incur significant personal liabilities such as money borrowings that you cannot settle. Any liability that you may incur arising from personal loans, issuance of personal guarantee and overdraft facilities from financial institutions to an extent, relative to the amount involved and your

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position in the Company that may affect the image of the company shall be considered as personal liability.

### **GIFTS AND GRATUITIES**

Giving and receiving gifts and entertainment is a common business practice. However, you should bear in mind that it is the Company policy to avoid any action that may cast doubt on the integrity or motivation of all employees, officers, directors or the Company. As a general rule, public disclosure of the acceptance of gifts/entertainment should not embarrass the Company or those receiving the gifts/entertainment. The following are basic guidelines in such events.

- A) No director, officer or employee shall either make or accept a commercial bribe in any form from suppliers and customers. Employees and officers should emphasize to potential suppliers that decisions are based on objective criteria such as price and quality as well as suppliers' reliability and integrity.
- B) No director, officer or employee shall solicit, whether verbally or in writing, gifts, donations, raffle prizes, bonuses, tips, in any form from suppliers, guests, clients and customers.
- C) No director, officer or employee shall require of any person or firm that as a condition of doing business with the Company, the person or firm must purchase the Company's goods or services.
- D) No director, officer and employee shall accept an unsolicited gift from any person or firm doing or seeking to do business with the Company if the gift is of more than nominal value. In no event will any director, officer or employee receiving a gift permit the donor to gain a business advantage because of the gift. A gift means anything of value. Consequently, tickets to the theatre, to concerts, or to sporting events are covered as well as, gift of securities, free trip, vacation or lodging /rental.

You may accept gifts of nominal value ordinarily used for sales promotion (for example, calendars, appointment books, pens, umbrellas, etc.).

Ordinary "business lunches" or reasonable entertainment consistent with local and business customs may also be permissible if these events are of reasonable nature and in the course of meeting or holding bona fide business discussions or to foster better business relations. Each employee or officer shall report all such entertainment to his/her immediate supervisors.

All employees and officers are urged to make our policy known to those with whom they deal so that these situations do not arise.



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### **DECLARATION AND UNDERTAKING**

Disclosure: Should there be any concern that an action may be potentially a conflict of interest, disclosure thereof is a must. Each employee is obligated to disclose any conflict of interest or any appearance thereof with pertinent details, preferably in writing to their supervisor or to PRDD.

Personal advantage of opportunity that may arise out of work should not be taken or adhered to. It means we don't use the company property or information for personal gain. The company shall be respected in this aspect.

There is always a blurred line as to what conflict of interest entails and may not always be obvious, thus, employees are required to use good judgment and critical thinking. A good determination is when such still allows the employee to pursue this without causing harm to the company or putting it at risk.

### **USE OF POSITION**

You should refrain from using your position influencing or persuading colleagues, client, suppliers and other business contracts to purchase non-company goods or service, buy tickets for fundraising, or to make contributions to causes no matter how worthy. Predictably, you will sometimes be asked to assist in a fund-raising project but discretion must be used to no undue pressure or influence is exerted.

### **AUTHORITY**

The authority to sign purchases, contracts, sales, discounts, and other pertinent documents given to some staff is subject to the limitations specified and determined by Management. No purchases or contracts shall be signed by a single person. It is to be countersigned by another authorized person. No member of staff shall conclude or induce such purchase, contracts, discounts, or similar transactions with himself, with members of his immediate family or with companies of which he or his family has interests.

### **LOAN CREDIT**

You and the members of your immediate family on behalf of the hotel are prohibited from borrowing or receiving credit, advances, or loans from third parties on an abnormally favoured arrangement.

### **CONDUCT OF BUSINESS**

You should not try to bribe or offer similar consideration to any person or company in order to obtain business for the company. Any commission, payments made, favourable terms conceded or other advantages given by any staff in the conduct of the company's business shall be put in writing and in accordance with the company's policies on such matters as determined and outlined by the company.

As much as possible, transact and consummate all purchases and contracts directly with the supplier

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and manufacturer. Avoid transacting with agents or brokers unless the latter render tangible service to the company. Request the disclosure of brokers and agents from manufacturer's supplier if any.

Any discount, commission or any favour/advantage in any form obtained while transacting business shall be reverted back to the company and not employee's personal benefit.

### **ATTITUDE IS IMPORTANT. THE 'NO FEAR' TO TELL THE TRUTH**

This concept is an augmentation to the Waterfront Whistleblowing and Goodwill policy. Its goal is to ensure the fairness and uphold the goodwill among peers and partners.

- Short cuts and easy answers often start the problem. We should reject the notion that if everybody is doing it, it must be okay. It doesn't make it right to think that everyone's doing it. Not "everyone" is doing it.
- Everyone is responsible. Managers should be able to ask their subordinates how to resolve the problem in a professional and ethical manner.
- The Hotel stand behind its peers who act in good faith. Peers should not fear to discuss solutions to the problem neither to communicate any misconduct they come across or witness.

### **PROTECTION OF HUMAN RIGHTS**

Waterfront Hotels and Casinos support the protection of human rights. We respect our employees' right to association under the law and provide a safe and healthy working environment. Likewise, we support the elimination of discrimination, promote diversity in the workplace and abhor harassment and sexual misconduct among our peers and partners. Any violation of this mandate, the company shall have the right to impose corresponding penalties under the code of conduct and applicable laws.

Correspondingly, we provide our employees with compensation and development trainings to enhance their skills and broaden their career paths. Thus, we advocate equal opportunity and employment. We promote fair competition and aim to conduct our business with honesty and integrity.

### **EQUAL EMPLOYMENT OPPORTUNITY**

The relationship between the Hotel and peers is sacred and as such is treated with utmost respect and importance. This relationship is governed by Philippine labour laws and Waterfront Hotels & Casinos Employee Handbook.

- Peers and prospective peers are to be given equal opportunities regardless of race, color, age, religion, sex, gender preference, disability, tenure, status, ancestry or national origin. This applies to employment, training, promotion, compensation, transfers, assignments, discipline,

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- terminations and all other employee actions.
- Company policies on employment relationship governed under the law shall be adhered to at all times.

## **DIVERSION AND INCLUSION**

While we tackle equal employment opportunities and non-discrimination, we also uphold and welcome diversity. Embracing diversity and being inclusive brings success to the Company as it widens its perspective allowing the company to grow efficiently forward. It allows the company to gain more exposure not only by adopting multi-lingual, multi-cultural, and multi-national among its Peers but it also helps us in serving and dealing with our global guests and partners effectively and efficiently. By having a workforce that's diverse it helps us to connect better to our guests and partners. We welcome the uniqueness of each individual and how these different perspectives, experiences and background will benefit us with their contribution.

Treat everyone with kindness, respect, and professionalism regardless of race, nationality, diversity, and unique ideas.

## **COMMITMENT TO SAFETY, HEALTH AND ENVIRONMENT**

The Company is not only concerned with protecting Company assets, but it also committed to protect the lives and properties of its workers and members of the community where it operates. It strives to eliminate potential hazards from the workplace to provide a safe, healthy and productive work environment for all its personnel and insure efficient operations.

- A) Every officer and employee should assist in maintaining a safe and healthy workplace.
- B) Every officer and employee should assist in maintaining compliance with laws concerning the environment. Any equipment or supplies used by officers and employees must be used in line with prescribed standards for safeguarding health and safety.

Business operations should be conducted in such a way as to avoid or minimize any possible adverse impact on the environment. In addition to complying with all environmental laws and regulations, the Company and all its directors, officers and employees are responsible for providing truthful and accurate information to government authorities in connection with any application for any environmental permit or any reports that may be called for under such permit.

## **COMMITMENT TO HARASSMENT-FREE WORKPLACE**

The Company fosters a work environment in which all individuals are treated with respect and dignity. It will not tolerate any type of harassment in the workplace or any form of unacceptable treatment of workers. Appropriate disciplinary action will be taken if any instances of harassment, exploitation, physical punishment and other forms of abuse are discovered.

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- A) Directors, officers and employees shall work together in maintaining an atmosphere free of racial, sexual, or other forms of harassment and abuse.
- B) Each employee should cooperate fully with management in maintaining a workplace free of employment discrimination on the basis of race, sex, religion, national origin, age, handicap, disability, or other bases prohibited by law.
- C) No employee, officer or director should retaliate against any other employee, officer or director for exercising rights granted by law.

### COMMITMENT TO DRUG-FREE AND SMOKE-FREE WORKPLACE

- A) No employee or officer shall use or be in possession of any illegal drug or drink intoxicating beverage on Company property, except in the case of Company sanctioned events (for alcoholic beverage only).
- B) Employees and officers are also prohibited from being on Company property under the influence of alcohol or any controlled or illegal substance and from smoking in prohibited areas within the Company premises.

### COMPETITIVE PRACTICES

Directors, officers and employees must deal fairly with the Company's customers and competitors. Advertising, and public releases, service and product claims are creative and competitive but should be, at the same time, current, accurate, balance, complete and not misleading. Employees, officers and directors should never intentionally misrepresent information to a customer.

Directors, officers and employees must avoid actions that might be construed as anti-competitive or anti-trust like agreements with competitors as to pricing and customer practices and other forms of unfair conduct that may tend to create a monopoly.

- A) The Company observes a standard of commercial fairness in devising advertising programs in such a way that products and services of the Company would succeed on the strength of their own qualities. Directors, officers and employees should not disparage or make any false statements about any products, services or employees of any competitors of the Company. If employees, officers and directors engage in any comparison of products and services with those of our competitors, such comparison should be fair, accurate and also supported by substantial evidence.
- B) Employees should not acquire information about a competitor by unlawful means.
- C) Employees should not use promotional allowances, gifts, excessive entertainment or any other means to improperly influence the customers or potential customers. The products and services will be marketed on the basis of price, quality and service.
- D) The Company will not pay any bribe, gratuity, kickback or similar payment to anyone,



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including agents or employees of our customers or members of their families, in connection with the sale of any products or services. Should any payments be requested, the Company's legal counsel should be contacted immediately. Company policy is to forego any business that can only be obtained by improper or illegal means.

- E) Employees should avoid communications with competitors about pricing, marketing, product development or about any other matter which suggests price fixing or anti-competitive activities in violation of the law.

### **COPYRIGHTS/COMPUTER SOFTWARE**

Business names, trademarks, service marks and marketing collateral assets (i.e company website, social media accounts, etc.) of the Company are valuable Company assets and only authorized directors and officers may negotiate or enter into any agreement regarding any of the Company's trademarks and service marks.

The Company also respects intellectual property rights of others and observes the terms and conditions of any license agreements to which the Company is a party. As a rule, directors, officers and employees, must not copy, modify transmit or distribute all copyrighted materials, unless authorized by concerned parties.

### **SOCIAL MEDIA RESPONSIBILITY**

Waterfront recognizes every person's right to his/her opinion; nonetheless, the Company believes that employees should separate personal and professional relationships in online communities and platforms. Employees shall be aware that the Company may observe the content and information made available by employees through social media. Thus, all our Peers should use their best judgment in posting material that is neither inappropriate nor harmful to the Company, its employees and customers.

This policy is intended to regulate the use of social media by employees, including employees' personal use of social media. The following are circumstances that are prohibited and applicable to postings of any form but not limited to commentary, content or image;

- Interferes with and disrupts work.
- Creates a hostile working environment.
- Harms the good will and reputation of the Company.
- Violates the Law and Company policies, rules and regulations.
- Facilitates inappropriate contact with Company partners and clients.
- Defamatory, pornographic, improprietary, harassing, obscene, libellous.
- Harasses or discriminate co-workers, partners, and clients. The content that employees post can become public and may have impact to the Company and its employees. Therefore, employees may not post and make an opinion regarding the Company and its employees that could harm and destroy work relationship, goodwill, reputation and atmosphere. Employees must be aware that existing policies and behaviour guidelines extend to Company related

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activities in the online environment apart from the Company premises.

- Breaches confidentiality obligations of Waterfront employees and those within the interest of the Company including partners and clients (guests). Employees should not disclose by posting personal information and information contained in confidential records from and about the Company or pertaining thereto. Further, employees are not allowed to disclose or post information that is protected by law or that is confidential and proprietary to the Company and its employees. If there are questions relating to what are confidential matters, employee shall check with its direct supervisor or manager or the Peers' Resource and Development Dept. (PRDD). Also, reference to Data Privacy Office shall be made.

Further, the Company should well remind the employees the following social media conduct:

- Should an employee find a situation in the Company social media account to be hostile or antagonistic, the employee shall disengage and withdraw from the conversation politely and seek the advice of the supervisor or manager. Conversations and postings in the Company social media should always be within the foundation of our Code of Conduct, dealt with respect, decency, discretion and professionalism.
- After-hour Activity
  - Subject to our policies and applicable laws, after-hours online activity that violates Company's Code of Conduct shall be subject to applicable disciplinary action or termination.
  - Subject to our policies and applicable laws, after-hours online activity that involves work or subject in relation with the Company, a disclaimer should be posted such as "postings on this site are my own and may not represent the Company's positions, strategies, or opinions".
- Company Social Media networks, blogs, and other type of online content that shall generate press and media attention or legal questions should refer these inquiries to authorized Company representative and the Hotels' Peers Resource and Development Department or PRDD.
- Use of Company Logo. Employees are prohibited to use Company logo and other images and iconography on personal media sites unless to share official marketing promotions and programs of the Company to help promote the Hotel's product and services.
- Employees should get appropriate permission before posting images of current or former employees, members, vendors or suppliers, or the use of third party copyrights, copyrighted material, trademarks, service marks or other intellectual property.
- Work time and property. Employees are prohibited to use computers and time at work, personal electronic devices during working hours to access social media sites for reasons unrelated to work. Further, employees may not use their company email accounts to access or identify them when engaging in any social media activity that is unrelated to their work and are encouraged to use their personal email account and use personal time for such activity.
- Ethical responsibilities. Online behaviour should reflect the same as one would when dealing in person. It should still be made with the highest professional standards and discretion.
- Disciplinary action. Any violation thereof shall be subject to disciplinary actions which may

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include, but not limited to, termination of employment, legal action, and/or referral to law enforcement as appropriate.

- It is recommended that employees keep personal social media accounts separate from Company related ones.

## **ELECTRONIC MESSAGING PROTOCOL**

Electronic Messaging can be considered as but not limited to email, text messaging and video conferencing using Company issued tools and network. These are called business communication tools that provide efficiency and faster means to communicate and give information which will help the Company achieve its business objectives. The Company's electronic messaging systems are to be used for business purposes which however can be used on a limited personal use and permitted if it does not have an adverse impact on the company business and in compliance with the company policies.

Acceptable electronic messaging includes;

- Correspondence with clients, contractors, suppliers and vendors.
- Accurate communication of information within the Company and affiliates.
- Distribution of approved memos and documents of company related materials and activities.
- In using social messaging application such as but not limited to Whatsapp, Viber, Messenger, Telegram, etc. and where company chat rooms are made, it is recommended to limit attaching confidential documents or materials containing personal and sensitive information in relation to the Company as these messaging tools are unsecured. Referral to the Company's Data Privacy policy shall be observed in the distribution of this information.
- Employees are prohibited to use the Company electronic messaging system and network to download any material that would otherwise promote copyright infringement. Employees are not allowed to access or download material that are sexually explicit, obscene, bullying, racially or ethnically offensive, pornographic, or otherwise unlawful.
- Supplementary and occasional personal use of electronic messaging is permitted as long as it is only occasional, limited and does not interfere with work and professional responsibilities nor diminish productivity. It is understood that these messages shall be subject to the Company's policies on company behaviour and can therefore be under Company property.

## **CONFIDENTIAL INFORMATION**

Waterfront Hotels and Casinos in the conduct of its business hold client information and those proprietary to the Company with utmost confidentiality and discretion. The important information that is entrusted by clients and partners to the Company are understood to be within a nature of relationship which requires maintenance of confidentiality. Information that brings the Company its competitive edge is managed with utmost discretion not only through the Company's policies on confidentiality and document control but also to the adherence of the Data Privacy Act.

Prohibited information pertains but not limited to confidential financial data or other non-public



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proprietary company information that would otherwise be held confidential being a publicly listed company and confidential information regarding our partners, concessionaires and clients shared with those who are not in the need-to-know basis.

The Company at the beginning of employment is required to execute a Confidentiality and Non Disclosure Agreement to employees to protect the Company's proprietary information and that of its clients, suppliers and contractors during the course of employment and even after. The Company shall impose the necessary disciplinary action should there be an overriding of these policies that has the potential of damaging the Company in any way. Disciplinary action can equate up to termination of employment depending on the degree of seriousness and damage caused by mishandling the confidential information.

Further, only authorized employees may speak in behalf of the Company. Truthful, honest and sincere communication is the only way our stakeholders and clients will trust us in doing the business well. Therefore, the Company sees to it that we only communicate in the highest standard of honesty and transparency. We only authorize certain individuals within the Company to speak on the Company's behalf. We take seriously the responsibility to protect the Company's confidential information and not use it inappropriately nor give false information.

### **NON DISCLOSURE OF INFORMATION**

An employee shall not disclose any information, know-how, data, process, technique, program, design, drawing, formula, test, work in process, engineering, manufacturing, marketing, books of accounts, financial statements, accounting ledgers, accounting journals, financial or personnel matter, or sales, supplier, customer, employee, investor, or business information, information on its branches (if applicable), or the like, whether in oral, written, graphic, magnetic, electronic, or other form, that is learned by or disclosed to him/her in the course of his/her employment whether disclosed in writing or orally.

Information covers any communication or data, in any form, including, but not limited to tangible, intangible, oral, written, graphic or electronic form that is delivered in connection with or relating to the business of the company.

### **USE OF INFORMATION**

- **Insider Trading.** The Company adheres to the laws on insider trading. Waterfront is a publicly listed company and thereby follows laws related to insider trading. No employee shall disclose information that can influence the buying and selling of securities. Employees should *beware discussing or giving others material information about the Company's financial or material business information that has not been announced in the public.*
- You are prohibited during employment or after termination of your employment with the company (except in the proper course of your duties or with the company's written



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consent) from divulging in or making use of any secrets or of any correspondence, accounts, connections or dealings of the company or of any knowledge gained during employment. You shall not in any way use the information to obtain financial gain. The Company will often have access to confidential and sensitive information. All matters which are confidential in nature acquired by you in the course of your employment must be considered highly classified.

- Political Affiliation or involvement. Waterfront respects political participation but should remain separate from the Company. Any employee who seeks office shall inform PRDD and should be allowed to work in accordance to Administrative Law on political positions permissible to hold both private and public office at the same time. Likewise, no company funds shall be used nor solicited to support any political undertakings of the employee without express authorization by management. While at work, no solicitation of political support should be done, only during personal time should any political activity or solicitation should be done and is clear that employees' political views are its own and not the view of the company.

## **RECORD**

All requests for consent and actual approvals or disapprovals must be filed in the employee's 201 file for record purposes.

## **USE AND PROTECTION OF COMPANY FUNDS AND ASSETS**

No director, officer or employee may use or remove from Company premises any Company property or services for any personal benefit or for the benefit of anyone else. Each director, officer and employee should ensure that Company funds and assets are used only for proper Company purposes and are protected from loss or damage. The terms "funds and assets" are all inclusive. They cover both tangible and intangible property. For example, buildings, equipment and supplies are covered, as are money, contracts, computer software, data held on computers, and the goodwill of the Company.

A director, officer or employee engaging or attempting theft of any property of the Company, including documents, equipment, intellectual property and personal property of other employees, may face immediate summary dismissal and possible criminal proceedings against him/her. All of you have the responsibility to report any, loss, misuse and theft or attempted theft to the PRDD or to the Security Department or to your manager as soon as they come to your attention.

It is Hotel policy to protect and conserve, within reasonable limits, the assets and properties of guests, clients and customers from loss or damage. As a consequence thereof, officers and employees are obliged to act with due diligence at all times.

There may be dire circumstances (e.g. natural disasters, fire, emergency situations) in which funds

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and assets simply cannot be saved. In such situations, however, officers and employees are obliged to protect and conserve Company assets to the extent that any such acts of protection will not put human life and limb in peril.

With respect to computers or computerized equipment and software, the following principles apply:

- 1) The purchase of hardware and software must be according to Company policy;
- 2) All manufacturers and suppliers' operating and security instructions must be strictly observed at all times;
- 3) Employees who use computers or computerized equipment shall exercise reasonable care of both hardware and software;
- 4) Computer equipment, software or gadget/device used for saving data may not be removed from the work site for any purpose not directly connected to the employees' duties;
- 5) Only software approved by the Company may be used on computers and other rules applicable to its use.

### REPORTING OF FINANCIAL CONDITION

The Company maintains accurate and transparent records and financial reports. The Company's records will be kept in accordance with generally accepted accounting principles, and with established finance and accounting policies. Accrual and reserve entries and the capitalization of costs will be used only for legitimate business purposes. All Peers shall cooperate fully with internal and external auditors during their examinations of the Company's books, records and operations. Being a publicly listed company, it adheres to applicable laws and abides to its reporting and administrative compliance in a timely manner.

### GOVERNMENT INVESTIGATIONS

It is the policy of the Company to readily cooperate with any government investigation. However, the company should have the opportunity to be adequately represented by its own legal counsel. If you have any information that would lead you to reasonably believe that a government investigation or inquiry is underway, such information should be communicated to your superior officer and/or the Officer for Corporate Affairs. A written subpoena or written request for information from the government should be submitted immediately upon receipt to the Officer for Corporate affairs and the Company's legal counsel before any action is taken or promised.

Employees should never, under any circumstances:

- A) shred or destroy documents which the court or any government agency may request for inspection in connection with any pending or threatened litigation;

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- B) alter any Company records or documents except consistent with Company procedures and applicable law;
- C) make any false statements to any government agent;
- D) attempt to restrain any other Company employee, officer or director to provide information to government authorities.

## SUSTAINABILITY

Waterfront Hotels and Casinos shall continue to create sustainable value to our stakeholders. We believe in the brand and therefore shall pursue all business engagements that will further the company's interests by following all business legitimacy requirements, fostering environmentally sound structures and community building.

The Company's success is in its capacity to evolve and be dynamic. Our success hinges in our ability to develop strategies where both industry and society benefit. We shall continue to uphold our Mission and Vision and remain relevant in the market as the leading local hospitality brand.

We shall address our economic, social and environmental challenge holistically to create long term value. Our foresight is emphasized in our corporate management programs on business development planning and business continuity program. Our annual, 5-year and 10-year business plan is a yardstick to our performance incentive and to which our progress is monitored annually. We focus our reporting around topics of high-value to our stakeholders and high impact on business. The business plans are presented during the Corporate Management Committee Meeting whereby these plans are assessed by an integrated process following each Hotel per Departments' contribution in coming up with projects that attains the Company's established KRA's and approved by senior management.

## CORPORATE SOCIAL RESPONSIBILITY

Waterfront understands and upholds the importance of keeping the best interest of the wider society in mind. It is in this outlook that the Company participates to support in any way it can the community to which it belongs to and champion certain advocacies to help maintain the community, in particular and the society, in general. The development and advancement of society in the long run is part of the responsibility the Company understands to support. We create a platform and strategy built to understand our actions and responsibilities to create a long term value to the communities we work and the people we engage with, not forgetting the importance of keeping the environment safe and clean.