



HUMAN RESOURCES DEPARTMENT POLICY MANUAL	DOC. # : HRP-061
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BUSINESS ETHICS, LABOR CODE OF CONDUCT & HUMAN RIGHTS POLICY	Revision No. : 000 Date Revised: N/A
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WORKING IN PARTNERSHIP WITH OUR SUPPLIERS

INTRODUCTION

General Tuna Corporation, core purpose is **“To nourish and delight everyone, everyday and everywhere”** in all families worldwide. It is our fundamental belief that everything is loaned to us by our Creator, to grow and develop for the good of all. As such, we respect and take care of what has been entrusted to us. It is in the spirit of “Malasakit”, our core value, which is the deepest form of commitment there is, that we will look after the welfare and interests of our stakeholders.




We will delight our Customers with products and services of uncompromising quality, great taste and value, easily within their reach. We will create value and provide fair returns on our Shareholders’ investments.

We will work hand-in-hand with our Suppliers and other Business Partners, helping them grow with us, and assure them of reasonable returns.

We will help improve the quality of life in Communities where we operate.

Collectively, we will give and do what is right and become proponents of good stewardship.

To promote awareness among employees on their avenues and their duties regarding selected sensitive issues in promoting and protecting the Core Value of Respect for Individual in the way we conduct business with our co- employees, our customers & suppliers, and the public in general;

Prepared by:	Reviewed by:	Approved by:
 JOEL S. SAAVEDRA HRD Manager	 HERMINIA B. NARCISO Plant Manager	 TEDDY C. KHO VP/GM & BU Head

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To promote the Core Value of “Malasakit” in the way we exercise prudence and diligence in using and taking care of resources entrusted to us by the Company

THE FUNDAMENTAL PRINCIPLES

The fundamental principles that create the foundation of our code of conduct are based on the regulations both Philippine and International laws that recognized standards and are embedded throughout the operations.

1. Business is conducted lawfully and with integrity.
2. Work is conducted on the basis of freely agreed and documented terms of employment with legal compliance.
3. All workers are treated equally with respect and dignity.
4. Work is conducted on a voluntary basis with no forced or compulsory labor.
5. All workers are of an appropriate age.
6. All workers are paid fair remuneration.
7. Working hours for all workers are reasonable.
8. All workers are free to exercise their right to form and/or join unions and to bargain collectively where permitted by law.
9. Our company ensures a healthy and safe working environment, assessing risk and taking all necessary measures to eliminate or reduce it to protect the workers at work. Safety is our main priority.
10. Workers have access to procedures
11. Business is conducted in a manner that embraces sustainability and reduces environmental impact.
12. Progress and compliance are monitored.

IMPLEMENTATION GUIDELINES:

General Tuna Corporation in all effort will conduct its business with integrity and respect to others. We look forward to the highest standards of behaviour from all our workers and those with whom we conduct our business. By becoming a supplier, you are stating that you share our fundamental principles.

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A. MANDATORY REQUIREMENTS FOR CONDUCTING BUSINESS WITH GENERAL TUNA CORPORATION

This section describes the mandatory requirements for our suppliers to establish and maintain a business relationship with General Tuna Corporation. We require all suppliers that work with or for general tuna corporation to confirm that all their activities comply with these mandatory requirements.

1. Business is conducted lawfully and with Integrity

CORRUPTION/EXTORTION/BRIBERY:

It is the policy of the Company to maintain morale in every department and to have efficient and productive employees and objectively and fairly deal with employee's manifestation of negative behaviour.

The company prohibits all forms of corruption, extortion and bribery such as borrowing or receiving money, commissions, offer of promises or soliciting material favours from suppliers or customer/client with which the company has business relationships for his/her own personal benefit. Entering into arrangements with suppliers, customers to obtain "kickback", or other preferential treatment or favors.

CONFLICTS OF INTEREST

The Company respects the rights of its employees to manage their affairs and investments and does not wish to impinge upon their personal lives. At the same time, employees should avoid situations that present a potential conflict between their interests and interests of the company. Employees should pay proper attention to the Company's interests. Employee owe of the company their loyalty and should avoid any investment or association that interferes with the independent exercise of sound judgement in the Company's best interests. Also, any activities that create the appearance of a conflict of interest should be avoided.



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To protect the company from the decision of employees adverse to the interest of the Company and likewise, spare employees from any undue suspicious, the circumstances in which conflicts of interest may exist must be defined, and the manner of handling such situations must be prescribed.

All employees are to exercise sound judgment guided by honesty and integrity in all matters affecting General Tuna Corporation. They are expected to promote only actions consistent with General Tuna Corporation ethical standards and avoid any conflict of interest.

NO GIFT ACCEPTANCE POLICY

All employees are not allowed to solicit or receive gifts from suppliers, clients/ customers, service providers, business partners, and other similar entities for whatever purpose.

Specifically, gifts sent by parties above or received from these parties must be reported to the immediate superior and forwarded to Human Resource Department for action.

Appropriate penalty for the violation according to amount accepted & worst, dismissal from the company.

COMPETITION AND COMPETITOR INFORMATION

All information about General Tuna Corporation is obtained legitimately and will be used only for legitimate purposes in compliance with all relevant anti-trust and other laws and regulations. No attempt is made at any time to divulge to General Tuna any information about General Tuna's competitors that is confidential to them and not available in the public domain.

FINANCIAL RECORDS, MONEY LAUNDERING AND INSIDER TRADING

All business and commercial dealings are transparently performed and accurately recorded in the supplier's book and records. There is no actual or attempted participation in money laundering. No confidential information in the



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supplier's possession regarding General Tuna Corporation is used either to engage in our support insider trading.

SAFEGUARDING INFORMATION AND PROPERTY

It shall be the policy of the Company to maintain accurate and complete records (including tracking capability), ensure proper & documented movement/transfer and retirement/disposition of company asset.

The Company as a matter of policy entrusts Company Assets to some employees because of the nature of their job. For this reason, it shall be the duty of the employee to exercise due care and diligence in the use and safekeeping of such assets, including Compliance to the recording/documentary requirements of the assets.

Failure to exercise due care and diligence on the use and safekeeping of Company issued assets shall be charged on the account of employee to whom the assets were entrusted/issued.

PROPRIETARY INFORMATION AND CONFIDENTIALITY

All information disclosed to Employee by the Company or received by Employee during Employee's stint with the Company, and all information generated by Employee based in whole or in part upon such information, in any form, tangible, electronic or otherwise, including, but not limited to, oral, written, graphic, demonstrative, sample, product or machine recognizable forms, and including but not limited to, diagrams, flow charts, drawings, photographs, computer files, computer listings, equipment, business plans, marketing plans, patent disclosures, patent applications or other intellectual property documents, including copyright application, proposed trademarks, service marks, grant applications and contract proposals, financing sources, phone lists, customer lists, descriptions of materials, service or contract agreements, purchasing and accounting information and documents, testing, financing, selling and business methods used, belonging to or designed or developed by or for the Company, shall be referred to in this Agreement as the "Proprietary Information". Employee agrees that the Proprietary Information shall be retained in



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confidence and shall not be reproduced, used, disseminated, displayed, tested, published, or disclosed to any third party without the prior written approval of the Company President.

In consideration of employment by the Company, the Employee assigns to the Company any and all inventions, procedures, process and/or innovations which may have been conceived and/or developed by the Employee during his/her employment. The Employee hereby agrees that any invention, innovation, procedure and/or process developed and/or conceived by him/she shall become part of the Company's Proprietary Information.

PRODUCT QUALITY AND RESPONSIBLE INNOVATION

Products and services are delivered to meet the specifications; quality and safety criteria specified in the relevant contract documents and are safe for their intended use. Research and Development are conducted responsibly and are based on good clinical practice and generally accepted scientific, technological and ethical principles.

COMPLIANCE WITH LAWS

The company build a culture of trust between employees and employer benefits the organization the most. The company establish a system promoting fairness, accuracy, and consistency that employees are feel secured with their employer and, as a result, are more committed to deliver and are better engaged at work.

The company comply with DOLE regulations on the payment of the right wages set forth by the RTWPB Region 12, payment of government-mandated contributions such as SSS, Pag-Ibig, and Philhealth, 13th Month Pay, Service Incentive Leave and the Security of Tenure as part of the employees benefits. These allow both employer and employees to focus on the actual job, creating opportunities to achieve results and build a better company culture.

WHISTLE BLOWER POLICY

Employees are expected to abide by the Company's Rules and Regulations. Employees are strongly encouraged to discuss with Supervisors, Managers or

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other appropriate personnel, when in doubt about the best and ethical course of action in a particular situation. Furthermore, a GTC employee cannot be compelled by a supervisor or a company official to violate a law or the Company policies, rules and regulations. In the interest of the company, employees who have knowledge of specific acts which he or she reasonably believes violate the rules and regulations must disclose those acts to the HR Manager or any of the Department Managers whom the employee is inclined to air his/her report.

2. WORK IS CONDUCTED ON THE BASIS OF FREELY AGREED AND DOCUMENTED TERMS OF EMPLOYMENT WITH LEGAL COMPLIANCE

Employment is freely chosen

- There is no forced, bonded or involuntary prison labor. Our worker/employees voluntarily agree to work/render service and exercise their right to labor which is deemed proper within the meaning of constitutional guarantees
- Our workers/ employees freely applied for work and are required to submit employment requirements, including identity papers, and submit them before starting to work. They are also free to leave or express desire to be separated from employment.
- No gender preference in every hiring and age requirement is at least 18 years old and above

3. ALL WORKERS ARE TREATED EQUALLY AND WITH RESPECT AND DIGNITY

- It is the policy and commitment of General Tuna Corporation that it does not discriminate on the basis of race, age, color, sex, national origin, physical or mental disability, or religion.

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4. WORK IS CONDUCTED ON A VOLUNTARY BASIS WITH NO FORCED OR COMPULSORY LABOR

- Forced labor is not allowed, General Tuna Corporation follow what is written in our Recruitment Ppolicy for permanent, temporary & outsourced workers.

5. ALL WORKERS ARE OF APPROPRIATE AGE

Child labor shall not be used

- The company religiously complies with the Republic Act No. 7610 known as the “Special Protection of Child Abuse, exploitation and Discrimination Act”.
- As a responsible employer, the best interest of children shall be the paramount considerations undertaken by GTC Management consistent with the provisions of the relevant ILO standards.
- Minimum age for hiring is 18 years old.

6. ALL WORKERS ARE PAID FAIR WAGES

Fair Remuneration.

- Our company respects the right of workers to receive fair remuneration regardless of position and work status.as mandated by the Philippine Law with basic minimum pay, holiday pay, rest day pay, overtime pay, night differential, service incentive leave, 13th month pay and security of tenure.

7. WORKING HOURS FOR ALL WORKERS ARE REASONABLE

Normal Working Hours

- The normal hours of work an employee has to render must not exceed eight (8) hours a day and should be exclusive of the one (1) hour daily lunch break. Philippine laws, however, do not prohibit work done for less than eight hours.
- Working hours shall include all time during which an employee is required to be on duty and/or to be at a prescribed workplace; all time during

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which an employee is permitted to work; and rest periods of short duration during working hours.

Meal Periods

- The company provides not less than sixty (60) minutes meal break to all employees as mandated by the Philippine Law.

Night Shift Differential Pay

- Every employee shall be paid a night shift premium of not less than 10% of their regular wage for each hour of work performed between 10:00 PM and 6:00 AM.

Overtime Work

- Work may be performed beyond eight hours a day provided that the employee is paid for the overtime work, which consists of an additional compensation equivalent to his regular wage plus at least 25% thereof.
- Work performed beyond eight hours on a holiday or rest day shall be paid an additional compensation equivalent to the rate of the first eight hours plus at least 30% thereof.
- Under time Not Offset by Overtime
- Permission given to the employee to go on leave for a day in a regular work week shall not exempt the employer from paying the additional compensation required for the overtime work done.

Right to Weekly Rest Day

- The company shall provide employees a rest period of not less than twenty-four (24) consecutive hours after every six (6) consecutive normal work days.
- The company has the right to determine and schedule the weekly rest day of the employees in a week.
- In case unavoidable circumstances when the employee is requested to report for duty. He/she is entitled for a Rest Day pay of 30%.

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Right to holiday pay

- The company shall pay holiday pay to all employees.

Right to service incentive leave

- The company provides employees who has rendered at least one year of service shall be entitled to a yearly service incentive leave of five days with pay.
- When an employee is made or permitted to work on their scheduled rest day, they shall be paid an additional compensation of at least thirty percent (30%) of their regular wage. They shall be entitled to such additional compensation for work performed on Sunday only when it is their established rest day.
- When the nature of the work of the employee is such that they have no regular work days and no regular rest days can be scheduled, they shall be paid an additional compensation of at least thirty percent (30%) of their regular wage for work performed on Sundays and holidays.
- Work performed on any special holiday shall be paid an additional compensation of at least thirty percent (30%) of the employee's regular wage. When such holiday work falls on an employee's scheduled rest day, they shall be entitled to an additional compensation of at least fifty percent (50%) of their regular wage.

8. ALL WORKERS ARE FREE TO EXERCISE THEIR RIGHT TO FORM AND/OR JOIN TRADE UNIONS AND TO BARGAIN COLLECTIVELY WHERE PERMITTED BY LAW.

Freedom of Association and the right to Collective Bargaining are respected

- All workers/ employees have the right to self-organize or form trade union as well as the right to collective bargaining.
- GTC recognizes the constitutional rights of worker to self-organization and peaceful concerted activities, including the right to strike in accordance with the law.

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- Workers participation and representation in policy and decision making processes affecting their rights, duties, welfare, and benefits as maybe provided by law are well present at GTC. We have good grievance procedure and voluntary mode of settling disputes.
- The right to self-organization, collective bargaining and negotiation are well founded in our Labor Code of the Philippines. Hence, these statutory and constitutional requirements made employer to comply and enhance better relationship in its compliance and these enable workers to bargain with the management on more or less equal footing.

9. WORKERS HEALTH AND SAFETY ARE PROTECTED AT WORK

Working Conditions are safe and Hygienic

- We have our active and efficient Health and Safety Committee who regularly conduct and assure compliance of all safe and healthful practices.
- All workers are given proper orientation on Safety/Health, GMP/SSOP and Hygienic practices before they start working. A quarterly health and safety training / re-orientation are conducted to all workers both old and new. Seminars on First Aid/ Fire Brigade, proper grooming, are reinforced to this cause.
- We have sufficient, clean, and safe toilet/ sanitary facilities with enough supply of potable water.
- We have clean and hygienic food court facilities, and resting areas for our workers convenience and comfort.
- The Safety and Health Committee is headed by our Safety & Health Manager composed of different representative from all functional departments. GMP/Hygiene Group is headed by the QC Manager. Both are reporting to the Plant Manager on these programs.
- Management is strictly implementing the same sex pat-downs inspection prior entering production entrances to ensure 100% body frisking as part of our ethical compliance.

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10. WORKERS HAVE ACCESS TO FAIR PROCEDURES

- GENERAL TUNA CORPORATION has establish mechanisms to promote fair, fast and efficient resolution of workplace issues such as suggestion boxes, open communication and call or text communications.
- Employees and volunteers should feel comfortable discussing issues with their manager or supervisor in accordance with the procedures outlined below.
- All formal avenues for handling of grievances will be fully documented and the employee/volunteer's wishes will be taken into account in determining the appropriate steps and actions.
- No employee will be intimidated or unfairly treated in any respect if they utilize this Policy to resolve an issue.
- This Policy applies to permanent and Service Provider's workers including volunteers, suppliers, neighbouring community and others.

11. BUSINESS IS CONDUCTED IN A MANNER THAT EMBRACE SUSTAINABILITY AND REDUCES ENVIRONMENTAL IMPACT.

- Operations, sourcing, manufacture, distribution of products and the supply of services are conducted with the aim to protect and preserve the environment and comply with environmental legislation and regulation.
- All necessary legal permits are held for its operations training is provided to all personnel to ensure knowledge of and compliance with all necessary legal permits. Effective environmental management plan should be in place.

12. PROGRESS AND COMPLIANCE ARE MONITORED

- The supplier will authorize General Tuna Corporation and its designated agents to engage in monitoring activities to confirm compliance with this Business Ethics and Code of Conduct including unannounced on-site inspections of manufacturing facilities and employer-provided free accommodation, review of books and records relating to employment matters; and private interviews with employees. The company will

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maintain on site all documentations that may be needed to demonstrate compliance with the Code of Conduct. General Tuna Corporation will seek to work with its suppliers to resolve non-compliances as first response to non-compliance.

B. REPORTING ON BREACHES.

These provisions apply to all suppliers contracted by General Tuna Corporation. Suppliers shall ensure that these provisions are also applied to/by sub-suppliers or outsourcing companies if the product(s) sold/services provided to General Tuna Corporation require(s) services outsourced or carried-out by suppliers of the Supplier.

1. Any failure to comply with this Policy including any failure by an employee of General Tuna Corporation or anyone acting on behalf of General Tuna Corporation, of which the supplier is aware, should be immediately reported to General Tuna Corporation. The failure to do so will be a breach of this Code of Conduct.
2. We strongly support a culture of speaking up for both suppliers and their workers without any fear of retaliation against those who report actual or suspected breaches.
3. General Tuna Corporation will investigate any reported non-conformity made in good faith and discuss findings with the supplier. The supplier shall assist with any such investigation and provide access to any information reasonably requested.
4. If remediation is required, the supplier will be expected to inform General Tuna Corporation and implement a corrective action plan and timeline to effectively and promptly resolve the failure.
5. Suppliers, their employees or contractors may report actual or suspected breaches of this Code of Conduct to General Tuna Corporation by phone or online. Reports can be submitted confidentially and anonymously (where permitted by law).
6. Failure to comply with this Code of Conduct or recommended remedial action will result in supplier contract termination and legal actions, without recourse.

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C. LAND RIGHTS & WATER RESOURCES

We recognize the significant implications regarding respect for human rights that land use and water use across our value chain may have, which we address through specific policy and action. While we do not typically purchase ingredients directly from farms, we are compelled, based on our values as a major buyer of several agricultural commodities, to take action and to use our influence to help protect the land rights of local farmers and communities.

We respect the human need for sustainable water supplies, safe drinking water, and protection of both ecosystems and communities through proper sanitation. Through our water stewardship program, we pursue a rights-based approach to water that mitigates risk by assessing local water risks, consulting and partnering with governments, communities and other stakeholders to develop water stress solutions where and when needed, and also implementing source water protection plans at our facilities.

CHANNELS FOR REPORTING ON BREACHES

The channels for reporting on breaches are as follows:

CONTACT

GENERAL TUNA CORPORATION
Purok Lansong, Barangay Tambler, General Santos City
9500 South Cotabato, Philippines
Telephone No +6383 554-4192 t0 94
Fax No. +6383 552-0134
Website : centurypacific.com.ph
Acknowledgment and Acceptance

This is to certify that I have fully read and understood the General Tuna Corporation Business Ethics and Labor Code of Conduct. As an authorized representative of my company, I hereby commit myself and my company to serve this Code of Conduct and to progress towards full compliance with all of its principles.



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Supplier : _____

Address : _____

Representative : _____

Signature : _____

Date : _____

HISTORY OF REVISIONS

REVISION #	DATE OF REVISION	REASONS
00	03/15/2020	Created Business Ethics, Labor Code of Conduct & Human Rights Policy