



## **CONFIDENTIALITY OF INFORMATION POLICY**

All Employees are required to maintain the integrity, confidentiality and privacy of any information obtained and provided to them in the course of their employment in any of the Companies under Phoenix Petroleum Philippines, Inc. (PPPI). Disclosure of confidential information is allowed only when it is authorized by the President and CEO of PPPI or his duly designated alternate, and/or required by law or regulatory agencies.

Confidential information includes not only information about the people that any of PPPI deal with, but also non-public information about any of the Companies in the Group, that if released, may be of use to competitors or harmful to its customers, employees, directors, and other stakeholders.

Confidential information includes but is not limited to the following:

- a. Information entrusted to any of the Companies under PPPI such as Employee Information and details contained in Employee Records or 201 Files;
- b. Undisclosed corporate plans, objectives, and projects;
- c. Stockholder personal records;
- d. Board of Directors and/or Management classified materials and business transactions;
- e. Internal corporate reports;
- f. Government reports;
- g. Company resources;
- h. Organizational structures;
- i. All non-public information where disclosure to third parties may not be in the best interest of any and all Companies under PPPI.; and
- j. Other information obtained from the records, reports, forms, and files of any of the Companies under PPPI, which if disclosed, will constitute unwarranted invasion of privacy to any of the employees, directors, shareholders and stakeholders of the Group.

Any Employee caught and found guilty of violating this Confidentiality of Information Policy shall be subject to disciplinary action as described in the Company Code of Conduct and Ethics, from suspension without pay to termination from employment, depending on the gravity of the offense, regardless whether the act results in losses to any of the Companies under PPPI.

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