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	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	1 of 17
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	CONFLICT OF INTEREST POLICY

Section 1. Introduction

Riverside Medical Center, Inc. ("RMCI" or the "Company") has a duty to its stakeholders (i.e. stockholders and investors, directors, officers and employees, customers and business partners; the public it serves, and the government and regulators) to ensure that the principles of integrity, transparency, accountability and fairness are upheld in all transactions and official actions of the Company. All Directors, Officers, Employees and Consultants (collectively "Company Personnel") are expected to execute their duties with the highest standard of ethics and integrity and adhere to the values and principles of the Company at all times. The Conflict-of-Interest Policy ("this Policy") sets out the Company's approach and guidelines on identifying and disclosing any actual or perceived conflict of interest situation that may arise during the execution of Company Personnel's duties towards the Company.

Section 2. Purpose and Objective

The objective of this Policy is to provide guidance to the Company Personnel on standards of conduct on various matters specifically with respect to conflict of interest while performing their entrusted roles and responsibilities, executing business decisions, and treating business opportunities, in the best interest of the Company and its various stakeholders. All Company Personnel are expected to adhere to this Policy and make required disclosures in the prescribed format (refer to Schedule I) and frequency (that is, in an annual basis), pertaining to their role within the Company.


Section 3. Applicability

A. This Policy applies to, and shall be implemented by all Company Personnel.

Company Personnel may become involved in situations where their private interests or those of their affiliates may conflict with the interest of RMCI and/or its subsidiaries. It is the obligation of each Company Personnel to avoid any actual or apparent Conflict of Interest

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	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	2 of 17
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	CONFLICT OF INTEREST POLICY

between RMCI and/or its subsidiaries, any Personnel and/or his affiliate. At all times, Company Personnel must be loyal to RMCI and its subsidiaries.

This Policy sets standards to govern conduct in such situations.

B. It is the intention of the RMCI Board of Directors that a similar policy shall be adopted and implemented by each subsidiary and the respective Presidents of these companies shall recommend the adoption of this Policy (or a similar policy) to their respective Boards of Director.

Section 4. Our Policy

As a policy, transactions which are or may have the potential of being deemed as Conflict of Interest transactions are discouraged and must be avoided. All business decisions of the Company Personnel must be based on the best interest of the Company and its stakeholders and must not be motivated by personal considerations and other relationships that can interfere with their independent and impartial judgment.

Section 5. Definition of Terms


For purposes of this Policy,

(a.) **AFFILIATE** – any person, entity, organization, business, or venture with whom/which a Company Personnel has an affiliation, personal relationship or financial involvement. These include among others:

- i. Relatives (as hereinafter defined);
- ii. Associates (as hereinafter defined);

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	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	1 of 21
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	GOVERNMENT INTERACTION POLICY

Section 1. Introduction

Riverside Medical Center, Inc. (the "RMCI" or the "Company") recognizes that government bodies and Government Officials (as defined below) play an important role in society and in nation-building (*i.e.* by establishing and maintaining the necessary conditions and institutions for economic stability, social cohesion, and environmental protection and in providing access to healthcare for its citizens).

To positively contribute to government's worthy endeavor, the Company participates in public-private partnerships and thereby invests in infrastructure, provides access to healthcare, and strengthens a sustainable healthcare system development for the country. Thus, the Company adopts this Government Interaction Policy (the "Policy") to reinforce its commitment to the highest ethical standards and best practices of professional conduct in terms of the Company's dealings with Government Officials and interacting with government agencies in the course of its business operations.


Section 2. General Statement of Objectives and Commitment

This Policy articulates the objectives, general behavior, limitations, and compliance requirements in relation to dealings and interactions with government agencies and Government Officials by the Company, its Directors, Employees and Consultants (hereafter, "Company Personnel"), to ensure that the Company remains independent of any political affiliation and its actions are characterized with utmost integrity.

The Company is committed to participating in a constructive, transparent, and responsible dialogue with Government Officials by providing and exchanging relevant, coherent, conclusive, and honest information.

In all its interactions with Government Officials, the Company is committed to honesty and integrity, adopting a transparent and responsible behavior, respecting all applicable local, national, and international laws as well as the provisions set forth in this

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	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	2 of 21
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	GOVERNMENT INTERACTION POLICY

Policy. The Company rejects any form of corruption or undue advantage which might influence Government Officials.

The Company interacts with government for the ultimate benefit of the patients it serves. To maintain its reputation and credibility, the Company is committed to ethical, bias-free, and compliant interactions with healthcare professionals in all of its business activities.

Section 3. Applicability

A. This Policy applies to all dealings and interactions with government bodies and Government Officials and shall be implemented by all Company Personnel.

B. The scope of this Policy extends across all of the Company's business dealings. Adherence to this Policy will ensure that Company Personnel are compliant with laws, their actions are governed by the highest ethical standards, which in turn will reduce the risk of the Company incurring criminal liability or suffering reputational damage. It is the responsibility of each Company Personnel to be aware of and remain compliant with this Policy.

C. It is the intention of the RMCI Board of Directors that a similar policy shall be adopted and implemented by each RMCI subsidiary and their respective subsidiaries and the respective Presidents of these companies shall recommend the adoption of this Policy (or a similar policy) to their respective Boards of Director.


Section 4. Definitions

For purposes of this Policy,

(a.) **BRIBE/BRIBERY** - the promise, offering or giving, directly or indirectly, of an undue advantage or benefit to any person who directs or works, in any capacity, for a private sector entity, for the person himself or herself or for another person, in order that he or she, in breach of his or her duties, acts or refrains from acting.

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	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	3 of 21
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	GOVERNMENT INTERACTION POLICY

(b.) **BUSINESS ADVANTAGE** - means that the company is placed in a better position financially and economically or in any other beneficial way either than its competitors or than it would otherwise have been had the Gift (which could constitute bribery or corruption) not given or received.


(c.) **CONSULTANTS** - includes professional consultants, firms, partnerships, counsels, outsourced companies or such other professional entities or individuals rendering professional or specialized expert services to RMCI and/or its Subsidiaries, as well as advisors of the Company who may be appointed by the Board of Directors or the President/CEO, or who act as representatives of the Company's investors, shareholders, affiliates or partners.

(d.) **EMPLOYEES** - refers to any individual hired by RMCI for salaries and/or benefits provided in regular amounts at stated intervals in exchange for services rendered personally for the Company's business on a regular basis and who does not provide such services as part of an independent business. This includes RMCI's Executive Committee, Management Committee, Middle Managers, rank and file, and consultants, only for purposes of this Policy, other corporate officers under the Company's By-laws, fixed-term, project-based, part-time employees or Subsidiaries' employees who also work for/serve RMCI (e.g. on seconded basis).

(e.) **ENTERTAINMENT** - refers to any form of Hospitality such as meals given to or accepted from Third Parties and/or Government Officials by the Company or any Company Personnel. It also covers spectator and participative activities (i.e., golf, music, sailing, and other similar activities).

(f.) **GIFT** - means any item with value that is transferred from one person or entity to another as a sign of appreciation or friendship without expectation of receiving anything in return. It includes cash or cash equivalents to or from any current, former or potential patient, vendor, customer, broker, or provider. Cash equivalents include checks, honorariums, money orders, stocks, and savings bonds. Gift certificates, gift cards, store cards, or gambling chips are considered cash equivalents and should be subject to the

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	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	4 of 21
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	GOVERNMENT INTERACTION POLICY

limitation on common business courtesies and must be precleared with the Compliance Department prior to its offering and/or receipt. Gifts may also include goods or items of value whether for promotional or commercial purposes. Also include any business courtesy offered such as a product discount or any other benefit if the benefit is not extended to all employees. Finally, Gifts include 'courtesy gifts', which are nominal gifts given at culturally recognized occasions (e.g., weddings, funerals) or special times of the year (e.g., Christmas, New Year).

(g.) GRATUITIES - are favors or gifts, usually without any tangible form, which include any free or discounted items or services, such as meals, entertainment event tickets, golf and travel expenses, for which payment is normally required.


(h.) HOSPITALITY - includes food, drink, accommodation, flights or other means of transport, or entertaining (including receptions, tickets to entertainment, social or sporting events) given to or offered by colleagues to initiate or develop business relationships with other colleagues or Third Parties.

(i.) KICKBACK - is a form of negotiated bribery in which a commission is paid to the bribe taker for services, advantage or favors rendered.

(j.) GOVERNMENT OFFICIAL - all officers or employees of a government department, agency, or instrumentality at all levels and subdivisions (i.e. local, regional, national); permitting agencies; customs officials; candidates for political office; officer or employee of political parties; and officials of public international organizations (e.g., the Red Cross). This term also includes officers or employees of government-owned or controlled commercial enterprises such as state-owned or controlled universities, airlines, oil companies, health care facilities, or other vendors. The term also includes family members and close associates (i.e. person representing or acting on behalf of the official in meetings and/or business partners, etc.) of such individuals (e.g., it is not permissible to give a lavish gift to the sibling, spouse, or child of a government official if a gift to the latter would be prohibited under this Policy). This term also includes healthcare professionals (HCPs) who are practicing in government hospitals or any department,

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	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	5 of 21
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	GOVERNMENT INTERACTION POLICY

agency, or instrument of a government, when any of the following instances apply: (i) the HCP has an official decision-making role, (ii) the HCP has responsibility for performing regulatory inspections, government authorizations or licenses, or (iii) the HCP has the actual or perceived capacity to influence or make decisions with the potential to affect the business of the Company or any of its subsidiaries.

(k.) **THIRD PARTY** - an individual, entity, organization and/or its representatives that has existing and/or intended business dealings with the Company. This includes prospective or existing suppliers, contractors, consultants (including, Healthcare Providers), buyers, dealers and customers. This also covers associates (former classmates, co-workers, co-fraternity members, co-members in closed knit associations such as masonry/lodge, etc.) who are also prospective or existing suppliers, contractors, buyers, dealers or customers. This also covers partners in CSR activities, grants, sponsorships, foundations and other similar organizations.


Section 5. Detailed Policy Statements and Guidance

A. Company Personnel shall not be permitted to pay or receive bribes

Company Personnel must conduct their activities in full compliance with this Policy, the Company's Anti-Bribery and Anti-Corruption Policy, the Philippine Anti-Graft and Corrupt Practices Act ("RA 3019"), the UK Bribery Act, and the United States Foreign Corrupt Practices Act ("FCPA"), and all other applicable laws relating to bribery or corruption in each jurisdiction in which Company Personnel do business.

Under this Policy, Company Personnel are not permitted to give or offer anything of value, directly or indirectly, to any Government Official or any commercial party for the purpose of improperly obtaining or retaining a Business Advantage. "Anything of value" should be broadly interpreted to include cash, Gifts to family members, forgiveness of debt, loans, personal favors, Business Advantage, Gratuities,

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	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	6 of 21
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	GOVERNMENT INTERACTION POLICY

Entertainment, meals, travel and other forms of Hospitality, political and charitable contributions, business opportunities and medical care, among other items. Company Personnel are also prohibited from making facilitation payments, those relatively insubstantial payments made to facilitate or expedite routine governmental action. Simply put, Bribes, Kickbacks or similar payments are never permitted, whether made to a Government Official or to customers, investors, clients, or other private parties. Similarly, Company Personnel may not solicit or accept such payments. Company Personnel are required to exercise common sense and judgment in assessing whether any arrangement could be perceived to be corrupt or otherwise inappropriate.


If confronted with a request or demand for an improper payment or other violation of this Policy, the request or demand must be immediately rejected and reported to the Company's Compliance Officer in writing within three (3) days from receipt/knowledge of the request/demand for improper payment (*See relevant form in Annex "A"*). Similarly, if any Company Personnel or agent knows or believes that an improper payment has been or will be made, the Company Personnel or agent must also report such payment to the Company's Compliance Officer within three (3) days from knowledge thereof (*See relevant form in Annex "A"*).

The Company's policy is that no adverse employment action will be taken against any personnel in retaliation for, honestly and in good faith, reporting a violation or suspected violation of anti-corruption laws or this Policy.

B. Political Contributions and Charitable Donations

Company Personnel may not make political or charitable donations, whether in their own name or in the name of the Company, to obtain or retain business or to gain an improper Business Advantage. Any political or charitable contributions made by the Company must be permitted under the law, permissible pursuant to the terms of this Policy, made to a *bona fide* charitable organization, and in the case of political contributions or charitable contributions connected to any Government Official or government entity, prior approval of Company's Compliance Officer and the Company's

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	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	7 of 21
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	GOVERNMENT INTERACTION POLICY

President & CEO is required. In certain instances, where there is heightened risk of corruption, Company's Compliance Officer or the Company's President & CEO may require due diligence to be conducted. The Company's Compliance Officer and the Company's President & CEO must be notified if a Government Official solicits a political or charitable contribution in connection with any government action related to the Company or any of its subsidiaries (*See relevant form in Annex "B"*). Individual Company Personnel or agents may not make political contributions on behalf of the Company or its affiliates.

Company Personnel may, of course, exercise their personal right to make charitable donations from their own resources, providing this does not give rise to any actual or apparent conflict of interest or appearance of impropriety for the Company.

C. Commercial Contracts with Government Agencies

Doing business and interacting with Government agencies and Government Officials are regulated and typically follow stricter rules than those in the commercial marketplace.


If the Company has any business or contracts with Government Officials or a Government-owned (or partially owned) company/entity, it has a special duty to know and comply with all applicable laws and regulations, adhere to the highest standards of integrity and avoid even the appearance of impropriety.

Discounts or rebates for any business transactions with Government bodies must reflect a business need. They must comply with the Company's discount and rebates policy, if applicable, and pre-approved in writing by the Company's Compliance Officer.

D. Summary of good practices when interacting with Government Officials ("Dos and Don'ts" Guidelines)

In all its interactions with Government Officials, the Company is committed to honesty and integrity, adopting a transparent and responsible behavior, respecting all

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	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	8 of 21
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	GOVERNMENT INTERACTION POLICY


applicable local, national, and international laws as well as all relevant company policies, including, but not limited to the Company's Anti-Bribery and Anti-Corruption Policy (ABAC Policy), other applicable Company policies, and the provisions set forth in this Policy. The Company rejects any form of corruption or undue advantage which might influence Government Officials.

The following principles underpin responsible and transparent interactions by Employees with Government Officials:

- Interact ethically and with integrity.
- Employees are expected to act ethically, honestly and with professionalism always when engaging with Government Officials.
- Employees are expected to apply professional judgement in circumstances that are not covered by laws, regulations, or the Company's Policies.
- Gifts of cash or cash equivalent (e.g. cash vouchers, prepaid coupons or gift cards), regardless of value, must never be offered to Government Officials (or their related parties).
- Payments for legitimate government related expenses (e.g. permits, licenses) should be made directly to the Government agency. Official receipts from the relevant Government agency must be retained.

Any relationship with Government Officials must be in strict compliance with the rules and regulations they are subject to (i.e., any applicable rules or regulations in the particular country relating to public officials or that have been imposed by their employer) and any benefit conveyed to a Government Official must be fully transparent, properly documented, and accounted for.

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	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	9 of 21
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	GOVERNMENT INTERACTION POLICY


- **DOs:** The following are good practices in relation to interaction with Government Officials include the following:

- 1) Interactions with Government Officials should usually be expected to occur during business working hours and in the Government Official's or at the Company's office.
- 2) Interactions with Government Officials should be attended by at least two employees and individual one-on-one meetings with Government Officials outside of office hours need prior approval, which must be documented by an official email or text message from the Immediate Superior of the Company Personnel concerned or of the Compliance Officer and Company's President & CEO.
- 3) Provision of Hospitality is to be kept modest and limited to only food and non-alcoholic drinks, to avoid the appearance of impropriety.
- 4) Government Officials should be informed of the Company's Policy on Interaction with Government Officials, and in specific around the dos and don'ts.

- **DON'Ts:** The following are practices to be avoided in relation to interaction with Government Officials:

- 1) Never offer, promise or give (either directly or indirectly) anything of value to induce or influence a Government Official.
- 2) Do not pay for a Government Official's travel, accommodation, or other expenses pertaining to any Company interaction, unless it relates to business operation needs such as site visits/ audits to the Company premises and is explicitly allowed under local regulations.

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	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	10 of 21
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	GOVERNMENT INTERACTION POLICY


- 3) Do not allow or agree with Government Officials to invite guests (family or friends) to Company interaction/ functions. Under no circumstances should the company cover any costs associated with a guest's involvement.
- 4) As a general rule, Third Parties should not be used for interactions with Government Officials. Should it be necessary to engage the services of a Third Party to interact with Government Officials, such Third Party must accomplish and submit a Third Party due diligence questionnaire and the engagement must be pre-cleared with the Company's Compliance Officer.
- 5) Avoid situations, interactions and actions by employees that could give rise and result in the appearance of conflict of interest.
- 6) Never use Company assets and resources for personal use of Government Officials.

Section 6. Government Interaction Log

Transfers of value (modest meals, Hospitality, Gifts) should be recorded in a Government Interaction Log maintained by each department of the Company. Such documentation should clearly indicate business purpose and decisions taken, if any, during such interactions.

It is the responsibility of the Middle Managers that such a log be maintained and updated for each such transfer of value (*See relevant form in Annex "C"*). This Government Interaction Log must be submitted by all departments of the Company to the Compliance Officer on a monthly basis not later than the fifth (5th) day of each succeeding month.



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	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	11 of 21
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	GOVERNMENT INTERACTION POLICY

Section 7. Consequences of Violations

Any Company Personnel who fail to comply with this Policy shall be, upon notice and hearing, subjected to penalties and sanctions as may be determined by the Human Resource Division Officer HRD Industrial Relations Manager, and Compliance Officer, and the Company President & CEO. Third Parties found to have defied this Policy shall also be penalized.

Section 8. Effectivity

This Policy shall take effect immediately. All existing policies, rules, system practices, and related implementing guidelines concerning the same matters covered by this Policy are deemed superseded. In the event of any inconsistency between this Policy and guidelines contained herein and the terms of other existing policies, rules, system practices and related implementing guidelines, the Policy and guidelines contained herein shall prevail.


This policy, the other Corporate Governance Policies, and the Code of Ethics and Business Conduct have supplemental application to each other.

Section 9. Approval, Amendment or Alteration of this Policy

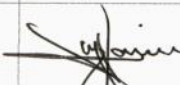

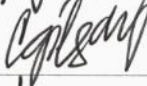




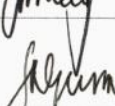
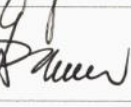


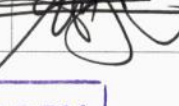

This Policy has been approved and adopted by the Board of Directors of the Company. The Compliance Department Office and the Company's Board of Directors, Executive Committee, Management Committee, and Middle Managers have the overall responsibility for implementation, monitoring and periodic review of this Policy.

This Policy shall not be amended, altered or varied unless such amendment, alteration or variation shall have been approved by resolutions of the Board of Directors.




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	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	12 of 21
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	GOVERNMENT INTERACTION POLICY

APPROVAL:

	Name/Title	Signature	Date
Prepared:	JHAZEL V. JAVIER, CPA Compliance Officer – Developmental Assignment		8/03/2021
Verified:	NANCY B. HIZON, MS Psych, FPCHA Human Resources Division Officer		8/11/2021
	CHARMAINE G. ILEJAY Sales & Marketing Division Officer – Developmental Assignment		8/11/21
	RICKY G. SALIDO Logistics Division Officer – Developmental Assignment		8/12/2021
	JULIE ANNE CHRISTINE J. KO, CPA, MBA, FPCHA Chief Finance Officer – Developmental Assignment		8/15/2021
	ENGR. NOEL P. GARBO Engineering & General Services Division Officer		8-20-2021
	ROSARIO D. ABARING, RN, MAN, PhD, FPCHA Ancillary Division Officer		8-20-2021
	PRINCESS M. ABELLON, MBA Pharmacy Division Officer – Developmental Assignment		8-11-21
	MARIA LIZA C. PERAREN, RN, MN Nursing Division Officer – Developmental Assignment		8-29-2021
	HENRY F. ALAVAREN, MD, FPSMID, FPSQua Total Quality Division Officer		8/25/2021
Recommending Approval:	MA. ANTONIA GENSOLI, MD, FPPS, FPCHA Vice President- Chief Medical Officer and Medical Director		8/26/2021
	SOCORRO VICTORIA L. DE LEON, CPA, MBA, PhD Vice President- Chief Operating Officer		08/26/21
Approval:	GENESIS GOLDI D. GOLINGAN President and CEO		9/11/2021

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	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	13 of 21
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	GOVERNMENT INTERACTION POLICY

DISSEMINATION:

Communicator's Bulletin

Weekly Management Meeting

Annual Reorientation of Employees


Pre-board and Onboard Orientation

REFERENCE:

Adopted with modifications from the Metro Pacific Hospital Holdings, Inc. (MPHHI) – Corporate Governance Policy: Government Interaction Policy.

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	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	14 of 21
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	GOVERNMENT INTERACTION POLICY


ANNEX:

ANNEX A: IMPROPER PAYMENT DISCLOSURE FORM

IMPROPER PAYMENT DISCLOSURE FORM					
<p>Note: Disclosing Party must provide all relevant information. This must be accomplished and submitted to the Legal and Compliance Department within three (3) days from the incident or knowledge of the incident being reported.</p>					
PERSONAL INFORMATION					
Name:					
Signature:		Email Address:	Date of Report:		
Office/ Department:		Designation:			
Phone No:		Email Address:			
REQUEST OR DEMAND FOR IMPROPER PAYMENT					
Name of Requesting Party	Government Agency/Position	Details of the Request for Improper Payment <i>(Must include the total amount involved and the form of payment)</i>	Date of Request	Action Taken by the Company Personnel	Remarks from the Chief Compliance Officer

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	Page Number:	15 of 21
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	GOVERNMENT INTERACTION POLICY

DISCLOSURE OF IMPROPER PAYMENT MADE

Recipient	Giver	Details of Improper Payment <i>(Must include the total amount involved and the form of payment)</i>	Date of Payment	Remarks from the Chief Compliance Officer


DISPOSITION

Please check which applies:

☐ Duly Noted
 ☐ For Further Investigation
 ☐ Approved
 ☐ Denied
 ☐ Others: _____

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	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	16 of 21
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	GOVERNMENT INTERACTION POLICY

SIGNATORIES		
Received by:	Reviewed by:	Approved by:
Name: _____	Name: _____	Name: _____
Designation: _____	Designation: _____	Designation: _____
Date: _____	Date: _____	Date: _____

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	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	17 of 21
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	GOVERNMENT INTERACTION POLICY

**ANNEX B: NOTIFICATION FORM FOR POLITICAL CONTRIBUTION,
CHARITABLE DONATION, AND/OR DISCOUNT**

NOTIFICATION FORM ON POLITICAL CONTRIBUTION, CHARITABLE DONATION, AND/OR DISCOUNT					
Note: Disclosing Party must provide all relevant information. This must be accomplished and submitted to the Legal and Compliance Department within three (3) days from the incident or knowledge of the incident being reported.					
PERSONAL INFORMATION					
Name:					
Signature:		Email Address:	Date of Report:		
Office/ Department:		Designation:			
Phone No:		Email Address:			
REQUEST FOR POLITICAL CONTRIBUTION, CHARITABLE DONATION, AND/OR DISCOUNT					
Name of Requesting Party	Recipient	Details of the Request <i>(Must include the total amount involved and the form of payment)</i>	Date of Request	Purpose	Remarks from the Chief Compliance Officer


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	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	18 of 21
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	GOVERNMENT INTERACTION POLICY

DISPOSITION		
Signature of Approving Authority:		
SIGNATORIES		
Received by:	Reviewed by:	Approved by:
Name: _____	Name: _____	Name: _____
Designation: _____	Designation: _____	Designation: _____
Date: _____	Date: _____	Date: _____


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	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	19 of 21
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	GOVERNMENT INTERACTION POLICY

ANNEX C: GOVERNMENT INTERACTION LOG

GOVERNMENT INTERACTION LOG					
<p>Note: This Government Interaction Log must be accomplished by all departments of the Company and must be submitted to the Legal and Compliance Department on a monthly basis, not later than the fifth (5th) of each succeeding month. Covered departments must submit this form on a monthly basis even if no interaction took place in any given month.</p>					
DETAILS ON REPORTING ENTITY					
Name of Person Accomplishing the Report:				Date of Report:	Covered Period:
Office/Department:					
Phone No:		Email Address:			
GOVERNMENT INTERACTION LOG					
Date of Transfer	Recipient (Include the name of the Government Official, position and the department concerned)	Details on the Item of Value Transferred	By Whom / Giver	Business Purpose	Date of Approval and Name of Approver, if applicable

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	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	20 of 21
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	GOVERNMENT INTERACTION POLICY

SIGNATORIES		
Prepared by:	Received by:	Reviewed by:
Name: _____	Name: _____	Name: _____
Designation: _____	Designation: _____	Designation: _____
Date: _____	Date: _____	Date: _____

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Document Type:	CORPORATE GOVERNANCE POLICY
Page Number:	21 of 21
Department/Section:	COMPLIANCE DEPARTMENT
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REVISION HISTORY

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