



MANILA TEACHERS' MUTUAL AID SYSTEM, INC.

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CODE OF BUSINESS CONDUCT AND ETHICS

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CODE OF BUSINESS CONDUCT AND ETHICS

The mission of the **Manila Teachers' Mutual Aid System, Inc.** ("**MTMAS**", "**Association**") is to be a performance-driven and customer-focused financial institution, providing diverse and high-quality financial products and services to its members.

This **Code of Business Conduct and Ethics** (the "**Code**") sets forth the Association's core values, outlines specific guidelines in applying the values in MTMAS' processes as a code of conduct for its Board, members, management, and employees, and lays down implementing structures and monitoring mechanism. All of MTMAS' Board, management, and employees and members unanimously and whole-heartedly agree to abide by the core values and provisions of this Code. They shall uphold, observe and enforce the same at all times.

The following are the basic code of business conduct and ethical behavior that includes the following:

A. COMPLIANCE TO LAW, POLICIES AND GUIDELINES

Our commitment to integrity begins with faithful compliance with the laws of the Republic of the Philippines, as well as internal policies and guidelines set by the Association.

Each of us must know and understand the policies, guidelines, rules and regulations that apply to our respective functions. If uncertain whether a contemplated act is permitted by law or company policy, we should seek guidance from our immediate supervisor, the Compliance Officer, or the Legal Department.

We are responsible for preventing and reporting any violation of law and company policy.

The Association shall impose appropriate administrative and/or legal sanction against any officer or employee found guilty of misappropriation, falsification or any related financial irregularities.

B. RESPECT TO OTHERS

We all deserve to work in an environment where we are treated with dignity and respect. Manila Teachers' Mutual Aid System, Inc. is committed in creating such environment because it brings out the full potential in each of us and we will contribute directly to the development and advancement of the Association.



Manila Teachers' Mutual Aid System, Inc. upholds equal employment opportunity and is committed to providing a workplace is free of discrimination, harassment, bullying, or any form of abusive, offensive or retaliatory conduct.

All personnel must act with professionalism, courtesy, and fairness in dealing with colleagues and members.

C. CONFLICT OF INTEREST

Employees shall avoid any situation that may create a conflict or appearance of conflict between their personal interests and the interest of the Association. When dealing with other employees, current or potential members, suppliers, contractors and stakeholders, employee shall act in the best interest of the Association as a whole. Employees must not allow personal relationships or advantages to influence business decisions.

No employee may take for themselves opportunities that are discovered through the use of company property, information, or position without the prior consent of the Board of Trustees and/or the Management.

Employee owe a duty to advance the Association's legitimate interest and are prohibited from using those opportunities for their own benefit. No employee shall use company property, information, or position for improper personal gain.

D. PROPER CONDUCT AND BEHAVIOR

As an Association, we promote high respect toward authority, members and other stakeholders of the Association. Abuse of power or authority for personal gain of favor is prohibited.

Manila Teachers' Mutual Aid System, Inc. maintains a professional work environment and prohibits any unlawful or extra-marital relationship between employees, between employees and members, and between employees and other personnel within the company or any of its affiliates, subsidiaries, and agencies, that may lead to favoritism, conflict of interest, or reputational damage to the Association.

Employees are expected to demonstrate professional decorum both inside and outside the workplace, especially when representing the Association.

E. ACCURATE BOOKS AND ACCOUNTS

It is the duty of every employee to maintain the accuracy and reliability of the company's business records. These records are crucial for compliance with



regulatory, legal, and financial reporting requirements.

Any employee who prepares or submits information for any records, regulatory reports, or financial statements, shall ensure that entries are truthful, accurate, legible, timely and supported by proper documentation.

F. Board of Trustees, Management and Employees should:

1. Listen to our members and make all reasonable efforts to satisfy their needs and concerns within the scope of our mission.
2. Strive for excellence and innovation, and demonstrate respect and professional responsiveness to members, and stakeholders.
3. Promote an inclusive workplace that values diversity, equity, and participation.
4. Recognize the value of individual contributions of our employees.
5. Respect the confidentiality of sensitive information about the Association, its members, stakeholders, board and personnel.
6. Comply with applicable Philippine laws, existing rules and regulations, and fiduciary obligations to ensure transparency and accountability in our operations.
7. For the Board of Trustees, exercise sound and independent judgement free from personal bias, and provide effective oversight of the Association's operations.
8. Not accept commissions, gifts, payments, loans, promises of future benefits or other items of value from anyone who has or may seek a benefit from the Association, except nominal tokens consistent with customary business courtesy and Filipino generosity.
9. Abide by the governing documents, by-laws, and policies of the Manila Teachers' Mutual Aid System, Inc.
10. Be accountable for adhering to this Code of Business Conduct and cooperate fully in any internal investigation or audit.
11. Act at all times in accordance with the highest ethical standards and in the best interest of the Association its members, employees and other stakeholders.
12. Appropriately acknowledge contributions from other individuals and organizations who help facilitate our goals.
13. Refrain from deceptive acts in recruiting new members.
14. Not engage in lobbying in a manner that compromises the integrity of the



Association.

G. COMPLIANCE, MONITORING, AND REPORTING

The Manila Teachers' Mutual Aid System, Inc. management is responsible for communicating this Code of Business Conduct and Ethics to all members of the Board of Trustees, Management, Members, and Employees, and for ensuring its adherence at all times.

This Code of Business Conduct and Ethics shall take effect immediately upon approval.

Approved and adopted by the Board of Trustees on October 22, 2025 (Board Resolution No. 60-2025)