

Section:	SUPPORT	Document Code:	SUP-HRD-001
Sub-section:	HUMAN RESOURCES	Effectivity Date:	July 01, 2025
Title:	CONFLICT OF INTEREST POLICY	Revision No:	01
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I. RATIONALE

A conflict of interest arises when personal interests interfere—or appear to interfere—with an employee’s ability to act in the best interests of the company. This can undermine decision-making, cause reputational damage, or lead to legal and compliance issues. It is the objective of this policy to encourage employees and related parties to prioritize the company's interests over personal interests, safeguard integrity and ensure that all employees uphold professional objectivity and loyalty.

II. SCOPE

The company’s conflict of interest policy applies to all employees current or prospective including independent contractors, consultants and all other persons acting in behalf of the company. The relationship of the company with its employees should be based on mutual trust. As the company is committed to preserve the interests of people under its employment, it expects its employees and partners to act only towards the protection of the company’s interest as well.

Conflict of interest may occur whenever an employee’s and/or partner’s interest in a subject may lend them to action, activities or relationships that undermine the company and may place it to a disadvantage and this includes:

- Employees ability to use their position with the company for their personal advantage;
- Employees and their relatives up to the fourth degree either of affinity or consanguinity, who is engaged in activities that will bring direct or indirect profit to a competitor, supplier, business partner, to the detriment of the company;
- Employees using connections obtained through the company for their own or their relatives private purposes;
- Employees using company equipment or means to support an external business;
- Employees acting in ways that may compromise the company’s legal personality.

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The possibility that a conflict of interest may occur can be addressed and resolved before any actual damage is done. Therefore, an employee who suspects that a conflict of interest exist must bring this matter to the attention of Management for the necessary corrective action to address it.

The statement of disclosure/questionnaire requires all employees/partners/consultants to provide information with respect to certain parties that are related to them by affinity or consanguinity which includes the following:

- a. Spouse, domestic partner, child, father, mother brother, sister;
- b. Any corporation or organization of which you are a board member, an officer, a partner, participate in the management, an employee, directly or indirectly or a beneficial owner;
- c. Any trust or other estate of which you have a substantial beneficial interest, act as its trustee or any similar capacity.

The Vitarich Corporation Integrity Monitoring Committee (VCIMC) is tasked to review and resolve these issues, if there are any, from the submitted disclosure forms. Rest assured that this report will be treated with utmost confidence and shall not be taken against you. However, any incident/activities not declared/elevated or deliberately concealed shall be dealt with the appropriate disciplinary action as provided for in our Company Rules and Regulations (CRR) not excluding dismissal if warranted.

In general, employees are enjoined to refrain from partaking in personal and/or financial interests and external activities that are against the company's fundamental interests.

III. POLICY REVIEW AND MODIFICATION

Vitarich Corporation reserves the right to modify or terminate this policy at any time with appropriate notice.



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PERSONAL DEALINGS DISCLOSURE FORM

Name of Employee: _____

Position/Department: _____

Date: _____

Personal: Relative: If relative, indicate relationship _____

Type of Disclosure

Engagement/Employment Holdings Business Transaction

Others: _____

Description of engagement, holdings or asset

Employee or relative's role

By signing this form, I am attesting that all information are accurate and that dealings detailed in this form does not in any way effect my responsibilities in Vitarich and is not in conflict with the company's interests.

Signature of Employee/Date

Department Head Signature Over Printed Name/Date

RICARDO MANUEL M. SARMIENTO

President/CEO

Have you or any person related/affiliated to you provided services or property or employed in any



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APPENDIX A

REVISION HISTORY

Revision Date	Revision No.	Supersedes Issue No. / Date	Reasons for Revision	Affected Section / Page
July 01, 2025	01	SUP-HRD-001	Policy Update- Replaced Objective with Rationale	Page 1 Section I- Rationale

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Prepared by:	Reviewed by:	Approved by:
NERISSA MAE L. SANTOS Legal Assistant	ATTY. LILIBETH R. CARAO AVP-Legal and Compliance/HRAD Manager	MA. DIANA M. CUNA SVP-Chief Human Resource Officer
Date	Date	Date: