

Hospital Policies and Procedures Manual

CORPORATE GOVERNANCE		Document Code: MMC-HPP-GLD-025	Rev. Code : 00
Gifts, Donations, Sponsorship and Grants Policy		Effective Date: October 1, 2021	Page 1 of 29
Issued by: Compliance Department	☒ New	Supersedes:	
Approved by:			
<i>(original document signed)</i> Atty. German Q. Lichauco II Corporate Secretary Oct/07/2021 Date Signed (MMM/DD/YYYY)		<i>(original document signed)</i> Manuel V. Pangilinan Chair, MDI Board of Directors Oct/11/2021 Date Signed (MMM/DD/YYYY)	

Makati Medical Center (MMC) adopts this Policy on Gifts, Donations, Sponsorship and Grants (the "Policy") to reinforce its commitment to the highest ethical standards and best practices of professional conduct in terms of the provision and receipt of gifts, donations, sponsorship and grants in the course of its operation and business dealings.

Objective

This Policy recognizes that it is at times imperative for the Company to provide and/or receive Gifts, charitable Donations, Sponsorships and Grants as an important part of developing and fostering business relationships, an essential aspect of functioning as a good corporate citizen, and a good demonstration of corporate social responsibility. However, the same must be made within the limits provided and determined by MMC to prevent impropriety, the appearance of impropriety, or the creation of undue and improper obligation on the part of the recipient.

This Policy articulates the compliance requirements in relation to the provision, offering, giving, and acceptance of Gifts, charitable Donations, Sponsorships and Grants to and by the Company, MMC directors, officers, executives, medical staff (who are in the position to decide or influence MMC's commercial activities related to the third party), trainees, employees and consultants (hereafter, "Hospital Staff").

It lays down the procedure to ensure that MMC and its Hospital Staff may provide and receive Gifts, charitable Donations, Sponsorships and Grants within the limits and in compliance with high standards of integrity as provided by relevant laws, rules and regulations. It ensures that the relevant charitable activities are undertaken or accepted with fairness and are reflective of the MMC's core values and ideals. This Policy includes guidelines on the acceptance, review and approval of sponsorships and solicitation requests and proposals sent to and by MMC.

Scope

This Policy applies to and shall be implemented by all Hospital Staff as defined below.

The scope of this Policy extends across all of MMC's business dealings. Adherence to this Policy will ensure that Hospital Staff are compliant with laws, which in turn will reduce the risk of MMC

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incurring criminal liability or suffering reputational damage. It is the responsibility of each Hospital Staff to be aware of and remain compliant with this Policy.

This policy excludes individual sponsorship to a Medical Staff who are NOT in a position to affect procurement, to decide or influence MMC's commercial activities related to the third party. In dealing with Pharmaceutical and Suppliers, all Medical Staff and Healthcare Professionals are required to adhere with highest standards of ethics, including but not limited to, Philippine Medical Association Code of Ethics and Mexico principle.

Definition of Terms

For purposes of this Policy,

- a. **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.
- 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. **CONFLICT OF INTEREST** - occurs when the private interest of a Hospital Staff and/or his Affiliate interferes or appears to interfere in any way with the interest of MMC. It can arise when a Covered hospital staff has interests that may make it difficult to perform his or her work objectively and effectively regardless of whether or not he or his Affiliate receives or will receive Personal Benefit (as hereinafter defined). Conflict of interest can also arise when a covered staff and/or his affiliate receives or will receive improper Personal Benefit from a transaction with MMC as a result of the Hospital Staff's position in MMC.
- d. **CONSULTANTS** - includes professional consultants, firms, partnerships, counsels, outsourced companies or such other professional entities or individuals rendering professional or specialized expert services to MMC, as well as advisors of the Company who may be appointed by the Board of Directors or the CEO, or who act as representatives of the MMC's investors, shareholders, affiliates or partners.

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- e. **DONATION** - is a voluntary gift given by companies, its employees, or any of its hospital staff, typically for charitable purposes and/or to benefit a cause. A donation may take various forms, including cash, services, new or used goods including clothing, toys, food, and vehicles etc. It may consist of emergency, relief or humanitarian aid items, development aid support and can also relate to medical care needs. Charitable gifts of goods or services are also called gifts in kind. These resources are allocated to specific projects and programs that fit within targeted areas of interest. Charitable Donation is an act or instance of presenting or giving anything in value, whether monetary or in-kind (such as money, food, clothes, medical services, etc.), to help people or organization or society at large, in times of need.
- f. **ENTERTAINMENT** - refers to any form of hospitality such as meals for Hospital Staff given by Third Parties. It also covers spectator and participative activities (i.e., golf, music, sailing, and other similar activities).
- g. **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 limitation on common business courtesies and must be pre-cleared 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. Gifts 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 gifts given at culturally recognized occasions (e.g., weddings, funerals) or special times of the year (e.g., Christmas, New Year).
- h. **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

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also includes healthcare professionals (HCPs) who are practicing in government hospitals or any department, 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.

- i. **GRANTS** - A sum of money or financial support generally provided for the purposes of research, higher study, innovation, training, planning or some other specific activity. May include money or technical support to facilitate the execution of approved projects which support high impact and innovative solutions in healthcare.
- j. **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.
- k. **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.
- l. **HOSPITAL STAFF** - any individual hired by MMC for salaries and/or benefits provided in regular amounts at stated intervals in exchange for services rendered personally for the MMC's business on a regular basis and who does not provide such services as part of an independent business. This includes MMC's officers, executives, heads, managers, rank and file, other corporate officers under the MMC's By-laws, temporary staff, casual employees, project employees, trainees, medical staff or subsidiaries' employees who also work for/serve MMC (e.g. on seconded basis).
- m. **KICKBACK** - is a form of negotiated bribery in which a commission is paid to the bribe-taker for services, advantage or favors rendered.
- n. **PERSONAL BENEFIT** - refers to gain or advantage, whether material or non-material, directly or indirectly provided to or received by a hospital staff and/or his affiliate, such as financial gain, professional advancement, travel, facilities and/or accommodation benefits, entertainment, preferential treatment in personal transactions, and other similar advantages.

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- o. RELATIVES - relatives of up to the third civil degree, by consanguinity, affinity or legal adoption, including, spouse, parents, children (and their spouses), siblings (and their spouses), nieces and nephews (limited to children of brothers and sisters) [and their spouses], grandparents, and aunts and uncles (limited to brothers or sisters of parents); and a domestic partner and his relatives of up to third civil degree, by consanguinity, affinity or legal adoption.
- p. REQUESTING DEPARTMENT/ UNIT or RDU - recipient of sponsorship or solicitation letter.
- q. SOLICITATION LETTER - a request letter received from an outside organization or sent to a third party by MMC Hospital staff asking for donations, funding, or participation in a project or event.
- r. SPONSORED TRAVEL - any travel, accommodation, and/or attendance/participation in conferences/conventions/seminars, international or domestic, whether for personal or business purposes, the costs of which are fully or partially paid for by Third Parties.
- s. SPONSORSHIP - defined as a common form of marketing involving the payment of money in exchange for access to the commercial potential associated with an event, a person, or a property. Also, money or services provided to a specific project, including financing an institution or an association, among others, with the central purpose of obtaining business benefits and advertising Company products and services.
- t. 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, independent healthcare providers (including physicians and trainees), 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 Corporate Social Responsibility activities, grants, sponsorships, foundations and other similar organizations.

Policy

General Policy on Gifts

MMC competes for and earns business through excellent quality of patient care and services by its Hospital Staff, and not with gifts or lavish entertainment. The use of MMC funds or assets for gifts,

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gratuities, or other favors to Government Officials or any other individual or entity (in the private or public sector) that has the power to decide or influence MMC's commercial activities is prohibited, unless **all** of the following circumstances are met, in which case it shall be considered a "Token Gift":

- (a) the gift does not involve cash or cash equivalent gifts (e.g., gift cards, store cards, or gambling chips);
- (b) the gift is permitted under both local law and the guidelines of the recipient's employer or approved by MMC CEO / Medical Director (if MMC Staff or department is the recipient);
- (c) the gift is presented openly with complete transparency;
- (d) the gift is properly recorded in the Company's books and records;
- (e) the gift is provided as a token of esteem, courtesy, or in return for hospitality and should comport with local custom; and
- (f) the item costs not more than PhP5,000.00 ("Nominal Value").
- (g) the gift is not from a supplier or potential supplier of MMC

Gifts that do not fall specifically within the above guidelines require advance consultation with and approval by MMC's Compliance Officer and Medical Director or President or the Chairman of the Board of Directors as indicated in this Policy.

Note that the provision of gifts, as well as the reporting requirements, in this Policy, apply even if Hospital Staff is not seeking reimbursement for the expenses (i.e., paying these expenses out of own pocket does not avoid these requirements).

Hospital Staff, likewise, must not accept or permit any member of his or her immediate family to accept, any gifts, gratuities, or other favors from any customer, supplier, or other person doing or seeking to do business with MMC, other than items of Nominal Value. Any gifts that are not of Nominal Value should be returned immediately and reported to the immediate supervisor of the Hospital Staff concerned. If immediate return is not practical, they should be given to MMC for charitable disposition within 72 hours.

General Policy on Hospitality

Common sense and moderation should prevail in business entertainment and the payment of travel, and lodging expenses engaged in on behalf of MMC. Hospital Staff should provide business entertainment to someone doing business with the Company only if the entertainment is infrequent, modest, and intended to serve legitimate business goals.

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Meals, entertainment, travel, and lodging should never be offered as a means of influencing another person's business decision. Each should only be offered if it is appropriate, reasonable for marketing and promotional purposes, offered or accepted in the normal course of an existing business relationship, and if the primary subject of discussion or purpose of travel is business. The appropriateness of a particular type of entertainment, travel, and lodging of course, depends upon both the reasonableness of the expense and on the type of activity involved. This is determined based on whether or not the expenditure is sensible and proportionate to the nature of the business relationship and the stature of the individual involved. Adult entertainment is always prohibited.

Expenses for meals, entertainment, travel, and lodging for Government Officials or any other individual or entity (in the private or public sector) that has the power to decide or influence MMC's commercial activities may be incurred without prior approval by the Compliance Officer only if **all** of the following conditions are met, in which case it shall be considered a "*De minimis* Corporate Hospitality":

- (a) The expenses are bona fide and related to a legitimate business purpose and the events involved are attended by appropriate MMC representatives;
- (b) The cost of the meal, entertainment, travel, or lodging is not more than PhP5,000.00 per person; and
- (c) The meal, entertainment, travel, or lodging is permitted by the rules of the recipient's employer (if applicable).

For all such expenses, the reimbursement request must identify the total number of all attendees and their names, employer, and titles (if possible). All expense reimbursements must be supported by receipts, and expenses and approvals must be accurately and completely recorded in the MMC's records. In all instances, Hospital Staff must ensure that the recording of the expenditure associated with meals, lodging, travel, or entertainment clearly reflects the true purpose of the expenditure.

Note that the provision of meals, entertainment, travel, and lodging as well as the reporting requirements, in this Policy, apply even if Hospital Staff is not seeking reimbursement for the expenses (*i.e.*, paying these expenses out of one's own pocket does not avoid these requirements).

When possible, meals, entertainment, travel, and lodging payments should be made directly by the Company to the provider of the service and should not be paid directly as a reimbursement. Per diem allowances may not be paid to a Government Official or any other individual (in the private or public sector) who has the power to decide or influence MMC's commercial activities for any reason.

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Any meal, entertainment, travel, or lodging expense greater than PhP5,000.00 per person, and any expense at all that is incurred for meals, entertainment, travel, or lodging unrelated to a legitimate business purpose, must be pre-approved by the MMC Compliance Officer and the CEO / Medical Director.

Please note that in addition to traditional gifts, meals, entertainment, and travel that are provided to business relationships where Hospital Staff are not in attendance shall be considered gifts, and subject to the rules and requirements for gifts specified in this Policy.

Furthermore, Hospital Staff who have received Gifts and Hospitality from any Third Party with whom the Company does business or purposes to do business, whether directly or indirectly, shall inform their donor that these were received on behalf of the Company and shall be handled in accordance with this Policy.

Minimum Standard for Valid Donation, Sponsorship, and Grants

All transfers of value through charitable Donations, Sponsorships and Grants must always comply with the following minimum standards to be valid:

1. The transfer of value is for a legitimate and valid purpose;
2. The transfer of value is proportionate to the need/ benefit received;
3. There is no perceived or actual Conflict of Interest; and
4. The transaction/ activity and relevant records are maintained in a transparent, fair and open manner and that all transactions shall be properly recorded and supported in the financial books and records of MMC.

For the avoidance of doubt, MMC or its Hospital staff may not provide, offer, give, or accept charitable Donations, Sponsorships, and Grants which fail to comply with any of the above conditions.

Hospital Staff shall refrain from putting themselves in situations or acting in manner that could significantly affect the objective, independent or effective performance of their duties and responsibilities in Makati Medical Center (MMC).

Guidelines

Gifts and donations

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1. Solicitation of Gifts from Third Parties shall be avoided; while acceptance of Gifts from Third Parties shall be made on behalf of and surrendered to the Company, subject to the following guidelines:
 - a. Solicitation and/or acceptance of cash, cash/check gift certificates or other cash equivalents of any amount, free membership or subscription (e.g., Zoom account, journals, sport or other clubs), and any Gifts, except as otherwise provided for in the succeeding paragraphs, from Third Parties even if given on occasions of rejoicing or celebration such as Company parties, birthdays, anniversaries, or Christmas, is prohibited.
 - b. Gifts or donations solicited by and/or given to the Company for Company-authorized corporate social responsibility and continuing medical education programs or initiatives, including outreach or charitable works of the Company's officially recognized employee organizations, such as medical treatment, medicines for medical missions, food and supplies for calamities, materials for community development are acceptable; Provided, however, that in the event that not all Gifts or donations shall be accepted or entertained or not all Third Parties will be requested to make a donation, gift or pledge, the parameters, requisites or conditions for the selection shall be made transparent to all at the outset, including other relevant Third Parties.
 - c. Donations in kind such as system equipment, to be utilized for the MMC's continuing education, research and development projects may be solicited and/or accepted on behalf of the Company; Provided, however, that in the event that not all donations are accepted, the acceptance parameters and conditions for acceptance shall be made transparent to all Third Parties.
 - d. Raffle tickets (or prizes won from such raffle tickets) and other promotional items given to the Hospital Staff for their attendance to certain events, conferences or product presentations of Third Parties may be accepted; Provided, however, that the other participants are likewise entitled to such raffle tickets and given equal opportunity to win prizes.
 - e. Courtesy discounts given to Hospital Staff by Third Parties on the former's personal purchases of products and services of Third Parties are allowed; Provided, that such discounted purchases are made openly and documented and the same terms are made available to all Hospital Staff.

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2. Gifts offered to or received by Hospital Staff from Third Parties in connection with such Hospital Staff's acceptance of an invitation or actual participation as speaker, facilitator, or reactors in conferences or seminars sponsored or organized by such Third Parties may be kept by the recipient; Provided, that the other speakers, facilitators and/or reactors are also given similar gift/tokens of appreciation by relevant Third Parties, and Provided further that the cost of Gift does not exceed Php10,000.00 in any single occasion, and the total Gifts (from all Third Parties) received by a Hospital Staff under this circumstance should not exceed Php30,000.00 in any given year.
In contrast, for MMC employees, speaking engagements where a speaker receives fee which should be set in accordance to fair market value along with signed engagement contracts and the speaker has to pay relevant personal income tax from receiving that income. This should be included in the Disclosure of Outside Interest.
3. MMC employees and Staff with procurement making decision shall not be eligible to receive Gifts or freebies (except training/education directly related for the use of the equipment or device) as part of any purchase made by the Company.
4. The direct or indirect offer, payment, solicitation and/or acceptance of Bribes in any form by a Hospital Staff from a Third Party and vice-versa, is prohibited.
5. All gifts received by the Department are logged in the hospital's registry (refer to Appendix A: Gift Registry Form).

Hospitality - Entertainment

1. Hospital Staff shall use his best judgment in determining the propriety and frequency of accepting various forms of Entertainment offered by Third Parties. The following questions may be used as guidelines for a Hospital Staff in deciding whether an Entertainment is acceptable:
 - a. Is it related to the conduct of business?
 - b. Would I feel comfortable telling others about this Entertainment? How would it appear to other employees or people outside the Company?
 - c. Do I feel compelled to reciprocate or grant special favors as a result of this Entertainment (or am I trying to constrain Third Parties to reciprocate or grant favors)?

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d. Am I certain the Entertainment does not violate any law, local or business rules and regulations, this Policy, the Anti-Bribery and Anti-Corruption (ABAC) Policy of the Company, or any other Company rule?

e. Is it contrary to morals or good customs?

- Meals during business meetings are acceptable.
- Business meetings in locations that do not conform to accepted standards of propriety and are not conducive for business purposes shall be avoided.
- Acceptance of invitations to theater, concerts or social/sporting events are permissible; Provided, however, that such invitations are generally available to others in the same community, category or industry. Further, due regard to the frequency of attendance and benefit for the Company shall be considered at all times.
- Hospital Staff shall not use property belonging to Third Parties, their employees, agents, and/or representatives such as, but not limited to, vehicles, beach houses, resorts and vacation houses whether for their personal benefit or Company purpose.
- Hospital Staff shall refrain from requesting for or soliciting any form of Entertainment from a Third Party including sponsorship of MMC activities, non-Company supported charitable works, and/or personal events such as birthdays, weddings, baptisms, etc., or from accepting such Entertainment where such acceptance could impair their objectivity in the performance of their duties and obligations to the Company.

Hospitality – Sponsored Travel

- Sponsorship of MMC or Hospital Staff's attendance, which may include travel, accommodation and/or registration expenses in conferences, conventions, and exhibits is acceptable; Provided, that the sponsor is an industry/professional organization (e.g., Japan International Cooperation Agency, International Telecommunications Union, etc.) not associated with any Third Party.
- Hospital Staff may accept free travel and / or accommodation to conferences, conventions, exhibits, product presentation or other similar events from Third Parties, if such activity is part of the Professional's continuing medical education, provided however, that this is in compliance to the Mexico principle and the Professional's code of conduct. Acceptance should be approved

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by the Division Director and Medical Director for the Medical Group or CEO for the Corporate Group.

3. Hospital Staff is obliged to refuse offers of free travel and/or accommodation to conferences, conventions, exhibits, product presentations or other similar events from Third Parties not related to the Professional's continuing medical education (CME) requirement. Attendance at such conferences, conventions, exhibits, product presentations or other similar events shall be allowed only if: (i) it will benefit MMC, (ii) is approved by the appropriate approving authority as provided below and (iii) MMC pays for all expenses associated with such travel. However, in exceptional and justified cases as may be determined in writing by the applicable approving authority as indicated below, Hospital Staff may be allowed to accept sponsored travel to conferences, conventions, and such events from Third Parties.
4. Complimentary travel and accommodation for trainings from Third Parties may be permitted if these are part of an approved/existing contract and are deemed to benefit MMC.
5. There are instances when Third Parties provide Sponsored Travel to Hospital Staff to local and/or international business/industrial site to demonstrate actual performance of their products/systems (i.e., Proof of Concept). Acceptance of such sponsored invitation should be justified by the following:
 - a. The purpose of the travel should be business in nature and has a direct benefit to the future performance and business of the Company.
 - b. Knowledge of Hospital Staff assigned/chosen for the travel would be valuable to the evaluation of the system and directly related to his/her job function.

What Needs to be Done

It is the duty of Hospital Staff who is offered or receives a Gift and/or Hospitality to immediately disclose the offer or receipt thereof to his/her respective superior. These shall be handled in the following manner:

D. Gifts and Sponsorship

Type of Gift	Disposition
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1. Gifts, including cash, cash/check certificates or other cash equivalents of any amount	Shall be politely refused and/or returned to the Third Party. If not possible (for cultural reasons), third party should be informed that the gift will be forwarded to Compliance Department and will await final disposition from Gifts, Donations, Sponsorship and Grants Committee
2. Token Gifts	May be kept by the recipient after filling out Gift Registry form
3. Other gifts	May be kept once approved by Division Head and Compliance Officer (after filling out attached Gift Registry Form)

A copy of Gift Registry Form should be submitted to Compliance Department within 3 business days upon receipt of gift.

Hospitality - Entertainment and Sponsored Travel

Whenever a Hospital Staff receives offers of Hospitality, other than *De minimis* Corporate Hospitality, he/she shall discuss such offer for approval of the relevant superior (refer to the Table below) before acceptance. In all events, however, proper documentation, disclosure, reporting, approval and liquidation procedures, as required under the MMC's systems practice and implementing guidelines, shall be followed.

In cases where a relative of Hospital Staff solicits and/or accepts Gifts or Hospitality from Third Parties without adhering to the parameters set forth in this Policy, the Hospital Staff shall promptly, upon his/her discovery or awareness of such fact, disclose the same in writing to his/her relevant superior.

The superior with respect to the following shall be:

Position	Superior
a. Director	Board of Directors through its Chairman and Chair of Board Compliance Committee

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b. Officers (VPs and Head of Division)	CEO / Medical Director and Compliance Officer
c. Rank & File, Supervisors, and Consultants	Head of the Department, Division Head and Medical Director (for medical group) and CEO (For corporate group)

Charitable Donations

Required Approvals. In general, all provision and/or receipt of charitable Donations shall be approved by MMC Gifts, Donations, Sponsorship and Grants Committee specifically designated for such purpose.

Additional approval from the Compliance Officer should be obtained for charitable Donations to, or charitable events undertaken in partnership with public sector institutions, Government agencies, or any government linked third parties.

The Compliance Officer and the Chief Executive Officer (CEO) must be notified if a Government Official solicits a political or charitable contribution in connection with any government action related to MMC or any of its subsidiaries (Please see Notification Form for Political Contribution, Charitable Donation and/or Discount in the Company's Government Interactions Policy).

Eligibility Criteria For a valid charitable Donation, it is necessary to ensure that: (a) the charity is a legitimate charity incorporated under applicable law; (b) payment will not be diverted to or otherwise benefit the official or his or her relatives; (c) Donation is transparent and will be properly recorded in the financial records; (d) arrangement complies with all applicable laws; (e) Donation is not given in exchange for a favorable decision by the requestor; and (f) charitable Donations are duly approved.

Provision of Charitable Donations. All charitable donations to be provided by MMC should meet the following additional eligibility criteria:

- i. Due diligence report on the intended recipient or purpose must be accomplished by the Hospital staff or department concerned and must be submitted to the Gifts, Donations, Sponsorship and Grants Committee for evaluation.

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- ii. Due diligence report must contain a description of the purpose of the Donation which must be valid and legitimate; the need being addressed which should be proportionate to the value of the Donation; description of what will be donated; and the personnel involved in the Donation activity who must adequately show that no Conflict of Interest or the appearance thereof, arises from his/her/their involvement.
- iii. Must be approved by the following:

Type of Donation	Approval/Notification Required
Provision of all Donations in General	Gifts, Donations, Sponsorship and Grants Committee
Donations to, or charitable events undertaken in partnership with public sector institutions, Government agencies or any government linked third parties	Gifts, Donations, Sponsorship and Grants Committee and Compliance Officer
Solicitations made by a Government Official of any political or charitable contribution in connection with any government action related to the MMC or any of its subsidiaries	CEO and Compliance Officer
Donations e.g. real estate (listed as “unacceptable donation”)	Donations, Sponsorship and Grants Committee, Legal Counsel, Compliance Officer, CEO and MDI Board of Directors

Acceptance and/or Receipt of charitable Donations. Acceptance and/or receipt of charitable Donations by MMC should meet the following eligibility criteria:

- (i) The item to be donated should be of such nature and kind that is acceptable to MMC. The following are acceptable items for Donation to MMC: cash transfer or cheque, endowment, pledges, bequests, in kind donations which are related to medical sector like medical services by medical professionals, medical equipment, medical supplies, hospital beds, etc. Example of unacceptable donations to the MMC include shares of companies, real estate, etc. Exceptions to “unacceptable donations” is if the donation is made for the purpose of

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expanding MMC's own charitable activities like a new wing or building to service patients.

(ii) The Gifts, Donations, Sponsorship and Grants Committee should be responsible for the following aspects in relation to receipt, acceptance, and recording of donations:

- Review for acceptance or refusal; including approvals on agreeing on restrictions, if any, on the use of donations received in kind (example- medical equipment to be used only for child patients; donations received for specific building or ward; etc.);
- Any item identified as Donation received should not be accepted if the intent of the donor is to link to future benefit or influence operations or decisions of the Company; or which would involve unlawful discrimination, etc.);
- Decision on whether the Donation received are to be kept in the form in which they are donated or encashed;
- Appropriate controls shall be implemented to ensure transparent and fair practices for when Donations in kind are encashed; and
- Decision on whether Donation/ gift in kind may be acknowledged with a naming opportunity. However, if such naming opportunity result in material benefit to the donor (i.e. substantial free advertising) then that may be considered sponsorship, with relevant taxation implications.

(iii) MMC acknowledges and documents the receipt of the Donation (if possible) which will at the least include a Certificate of Donation to the donor and appropriate recording in MMC's financial statements (if in cash) and Logbook of gifts / donations.

(iv) In the case of in-kind Donation, donors must be requested to provide a fair market value of the Donation (if possible). For all high value donations, help of external expert may be taken.

(v) In cases of real estate donations, safeguards to ensure that the donation is not given to circumvent any existing laws or policies must be in place, e.g. all

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donations of real property must be covered by a contract that include ABAC clauses. The donation must be reviewed by Legal Counsel and Compliance Officer to check the parameters for exception have been met. Acceptance of donation should be approved by the Board.

a. Regular Monitoring and Auditing Mechanism

All Donations must be documented including the intended recipient, eligibility, and payment terms as relevant. The Donations must be made in a fully transparent manner. If a contract is signed in relation to the Donation made, the parties must include standard Anti-Bribery and Anti-Corruption ("ABAC") clauses in such contracts; and ABAC acknowledgment forms must be obtained from the foundations/beneficiaries for high ABAC risks arrangements.

The Compliance Department has a regular monitoring and auditing mechanism for charitable donations made. Documents in relation to recipient due-diligence, approval, execution and follow-up processes (to ensure that the donations have reached and benefited the intended recipients) shall be used for audit and compliance review where necessary.

A report listing Charitable donations (including purpose, entity and due diligence results) shall be maintained by the Gifts, Donations, Sponsorship and Grants Committee who has approved such donations. Likewise, all donations should be logged in the Gifts, Donations, Sponsorship and Grants Logbook. The report must be submitted for review and audit by the Compliance Department.

b. DOs: The following are good practices in relation to the grant or receipt of charitable Donations:

- Charitable Donations made by the Company have to be for a legitimate purpose; should not be linked to business needs and should comply with all applicable laws, regulations and code of conduct.
- All charitable Donations should be aligned with overall values, vision, and mission of the Company. The Company must only support projects, events, or activities that are most relevant to the Company or to the Group.

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- Product or in-kind donations are encouraged. Monetary donations should be occasional and require additional approvals.
- Purchase of items, if any, required for in-kind donations should be procured centrally within the Company and not reimbursed as Covered Personnel claims.
- c. **DON'Ts:** The following are practices to be avoided in relation to the grant or receipt of charitable Donations:
 - The Company must not give social contributions and donations with the intent of receiving any benefits in exchange. No charitable donations shall be made with the intent to obtain or retain any business or secure any improper advantage. Charitable donations shall NEVER be offered in connection with any bid, contract renewal or business opportunity.
 - Donations should not be made to individuals and any entity or organization whose primary purpose is to influence legislature or support political parties or candidates for public office.
 - Individual Company Personnel or agents may not make political contributions on behalf of the Company or its affiliates.

Solicitation and Sponsorships

All solicitation letters (including request for sponsorship) received by the department or hospital are forwarded to the Creative, Communications, and Sales Services Division (CCSSD). Considerations in approving sponsorships include documentation of the benefit, assessment of the fair value of the sponsorship and annual monitoring whether such benefit was received or not. Due diligence / background check should be conducted on recipient of the sponsorship to determine any relation with government. If the recipient has relation with decision making government officials / department that have direct role and can influence decisions related to MMC operations, there should be a documented evaluation whether giving sponsorship to such recipient will create bribery and corruption risk / issue / perceived favor to a government official. All Requests for Sponsorship and Solicitation letters from government entities or if private entities but written and sent for and in behalf of a government agency or office, are forwarded to the Compliance Officer for disposition.

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All solicitation letters sent by any MMC department must have terms of sponsorship attached to the letter indicating the purpose of the request and terms of reference for the liquidation of funds. These letters should be approved by the Medical Director for the clinical group or by the Division Head / CEO for the corporate group.

All sponsorship received by an employee or trainee is forwarded to Department Head/Manager, then to Division Head for recommendation prior to submission to Gifts, Donations, Sponsorship and Grants Committee. If sponsorship is received by the Department, the letter and memorandum of understanding should be forwarded to Medical Director for the medical group or Division Head for the corporate group for recommendation prior to submission to Gifts, Donations, Sponsorship and Grants Committee.

This excludes individual sponsorship to a Medical Staff (guided by PMA Code of Ethics and Mexico Principle) who are not in a position to affect procurement.

If sponsorship is received by individual from Procurement or any Officer of MMC that decide or may influence MMC's commercial activities related to the third party, recommendation will be given by Compliance Officer and final disposition will be given by the Gifts, Donations, Sponsorship and Grants Committee.

Solicitation from third party

1. The hospital, through the different Clinical Departments and Corporate Divisions, receives solicitations letters (including solicitation for private events or activities of government agencies) from third party or external groups.
2. The Clinical Department/ Corporate Division provides review and recommendation to CCSS within 7 days. Letters related to government agencies are forwarded to Compliance Officer. Clinical group under OMD seeks endorsement and approval from OMD prior to sending to CCSS.
3. CCSS reviews documents for approval or refusal prior to endorsing to the Compliance Officer (if from Government agencies or third party with relationship to Government agency).
4. Compliance Officer decides (refusal or approval), as indicated in # 3.
5. CCSS endorses to the originating Department or Division for processing.

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Solicitation from MMC Department to Third Party

When Departments request third party to sponsor continuing medical education activities, solicitation letter should be signed by the Department Chair / Head and approved by the Medical Director or Division Head / CEO, as appropriate.

Sponsorships

- a. Required Approvals.** In general, all provision of Sponsorships shall be approved by the Donations, Sponsorship and Grants Committee. Each Sponsorship proposal should be assessed in a transparent and accountable way.

Additional approval of the Compliance Officer should be obtained for Sponsorships to or undertaken in partnership with public sector institutions, government agencies or government linked third parties.

The Compliance Officer and the CEO must be notified if a Government Official solicits any Sponsorship in connection with any government action related to MMC or any of its subsidiaries.

b. Eligibility Criteria

All Sponsorships to be provided/received by MMC should meet the following eligibility criteria:

- i. MMC should receive meaningful and fair market value for its commercial sponsorship payments. To avoid having a payment characterized as a gift, there should be clear identifiable benefits and no indication of donative intent.
- ii. Sponsorship proposals should be assessed against transparent criteria that are publicly available and there should not exist any real or apparent conflict between the mission and objectives of the Company and the entities being sponsored.
- iii. All Sponsorships should support the achievement of MMC goals and objectives, be closely linked to key themes and priorities and ensure value for money.

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- iv. All sponsorship activity must include requirement of due diligence for intended recipients and end-user beneficiaries of the sponsorship, and approval limits should be set up to facilitate the process.
- v. All sponsorships be documented in a written agreement which includes the consideration and business benefits to be received. These written agreements must include standard ABAC clauses and ABAC acknowledgment forms must be obtained from the foundations/beneficiaries for high ABAC risks arrangements.
- vi. A sponsorship arrangement should not impose or imply conditions that would limit, or appear to limit, the MMC's ability to carry out its functions fully and impartially.
- vii. Sponsorship activities should demonstrate ethical, impartial and fair principles.
- viii. All Sponsorship activities should target audiences with key messages, increase effectiveness of Company programs and be evaluated on conclusion.
- ix. All sponsorships are entered in the Gifts, Donations, Sponsorship and Grants logbook of MMC that is accessible to the Gifts, Donations, Sponsorship and Grants Committee members and Compliance Department.

c. Regular Monitoring and Auditing Mechanism

The Compliance Department conducts regular monitoring and auditing mechanism for Sponsorships. Documents in relation to recipient due-diligence, approval, execution and follow-up processes (to ensure that the expected business benefits were evaluated on conclusion) shall be used for audit and compliance review where necessary.

Grants

- a. **Required Approvals.** In general, all provision and/or receipt of Grants shall be approved by the Gifts, Donations, Sponsorship and Grants Committee.

Additional approval of the Compliance Officer should be obtained for Grants in favor of public sector institutions, Government agencies or government linked third parties.

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The Compliance Officer and the CEO must be notified if a Government Official solicits Grants in connection with any government action related to the Company or any of its subsidiaries.

b. Eligibility Criteria.

All Grants to be provided by the MMC should meet the following eligibility criteria:

- i. Grants shall be provided only in the areas specifically designated by MMC. Each grant shall be based on review of proposals received, published guidelines and a competitive application process.
- ii. Grants shall be provided with the intent to develop knowledge that will benefit patients and advance science and medicine.
- iii. Every Grant awarded must have a contract which includes a specific purpose of the Grant along with terms and conditions of such grant. These contracts must include standard ABAC clauses and ABAC acknowledgment forms must be obtained from the foundations/beneficiaries for high ABAC risks arrangements.
- iv. Grants are not promotional activities and in order to avoid any connection with promotion, staff with sales/marketing function should not lead the review/approval process for Grants and they should not deliver Grants.
- v. Grants to organizations and entities are encouraged, and Grants to individuals should be occasional and require additional approvals from Compliance Department.
- vi. Specific eligibility criteria including requirement of due diligence for intended recipients and end-user beneficiaries of the Grant, review of proposals and selection of recipient of Grant should be set up to facilitate the process.
- vii. The Donations, Sponsorship and Grants Committee, with the help of the Medical Director, should ensure that the Grant is provided to achieve a specified scope of work or provide a specific product or service as agreed within a specified period of time.

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- viii. The contract for the Grants should specify how the funds of the Grants are to be used or put restrictions on the use of funds for certain expenses. Any changes from the originally approved budget items and disallowance of certain costs must require prior approval from the Gifts, Donations, Sponsorship and Grants Committee.
- ix. All grants are logged in the Gifts, Donations, Sponsorship and Grants Logbook of MMC.

c. Regular Monitoring and Auditing Mechanism.

The Compliance Department should develop regular monitoring mechanisms and receive regular reports on compliance with terms and conditions of the Grants provided.

The Company's legal should consider other aspects including publication restrictions, rights to tangible and intangible assets, protection of proprietary or confidential information, modifications, penalties, remedies, termination etc.

SUMMARY OF ACTIVITIES

Gifts and Hospitality – No expectation of Receiving Anything in Return		
<u>Sign of appreciation/friendship</u> - from patients (potential or former) - from suppliers/vendors - from societies (honorarium) - from community	<u>Goods</u> product discount	<u>Cash equivalent – for final disposition by Gifts, Donations, Sponsorship & Grants Committee (with Compliance Officer)</u> - checks - honorarium - money orders - stocks - saving bond - gift certificates - store cards - gambling chips
Donation		
for charitable purpose and to a benefit or cause		

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- Allocated to a specific project and programs to help people or organization in times of need
- is a form of gift

Sponsorship

- form of marketing by providing financial support or provision of goods or services associated with an event, person or property, or specific project with main purpose of obtaining business benefits and advertising company products and services

Grants

- financial support for purpose of research, higher study, innovation, training, or some other specific activity
- Money and technical support – for high impact and solutions in healthcare

Gifts / Donations / Sponsorship / Grants	Required Approvals for Acceptance			
	Gifts, Donations, Sponsorship and Grants (GDSCG) Committee	Division Head	Compliance Officer (CO)	Medical Director / CEO
Gifts compliant to A-F (acceptable list)				
- from patients	x	x	x	x
- from supplier	x	x	/	x
Charitable Donations	√			
- if for government institution	√	/	√	CEO
- if solicited by government institution	√		√	CEO
Gifts NOT compliant to A-F				
- from patients	/	/	√	x
- from supplier	/	/	√	x
Sponsorship				
- clinical departmental activities (post-graduate, monthly department CME activities)	/	x	x	/
- hospital-wide activities	√	/	x	x
Grant	√	x	x	/

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Consequences of Violations

Any Hospital Staff who fail to comply with this Policy shall be, upon notice and hearing, subjected to penalties and sanctions as may be determined by the Compliance Department and the Medical Director / President and CEO. Third Parties found to have defied this Policy shall also be penalized.

Roles and Responsibilities

ROLE	RESPONSIBILITIES
Recipient/Giver of Gifts/ Hospitality	Accomplishes and submits a Gift Registry Report Form within three (3) days from receipt of Gift/Hospitality. The report must provide complete information as laid down in Appendix "A".
Department Chair / Head / Manager	Managers and supervisors are responsible in ensuring that all their staff are aware and implement this policy consistently. In the review of any violation of this policy, managers and supervisors may be held liable for failure to instruct adequately their subordinates or for failure to detect noncompliance with applicable policies and legal requirements, where reasonable diligence would have led to the discovery of any violations or problems and prevent loss for the company.
HRMDD	- Actively promotes awareness of this Policy - In proper cases, in cases of noncompliance, imposes corrective measures in accordance with applicable laws, rules and regulations, policies after thorough investigation. - If the summary of investigation and sanction is appealed or if immediate head recommends for a higher or lower sanction, HRMDD shall conduct further investigation.
Compliance Department	Approves and endorses for approval of either the Head of the Division, the CEO, or the Chairman of the Board (as the case may be) any gift or provision of any hospitality to any Hospital Staff.

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	• Approves, recommends, revises and amends any changes to the Policy. • Approves and reviews all transactions involving provision and acceptance of Gift/ Hospitality. • Determines the giver and the recipient as well as the amount and kind of Gifts/Hospitality in case donor does not specify recipient of gift/hospitality. • Recommends to Gifts, Donation, Sponsorship and Grants Committee Gifts/Hospitality made by MMC to Third Parties specifically those falling beyond the applicable threshold set by this Policy • Oversees the record of all Gifts and Hospitality received or given to the Company or Hospital Staff. • In the event that there is non-compliance to this Policy, recommends imposition of appropriate penalties and remedial actions.
President and CEO	• Approves any gift or provision of any hospitality given to a Company Officer that is pre-cleared by the Compliance Officer.
Chairman of the Board of Directors	• Approves any gift or provision of any hospitality given to Company Director that is pre-cleared by the Chair of Board Compliance Committee.

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.

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, Division Heads and the MDI Board of Directors has the overall responsibility for implementation, monitoring and periodic review of this Policy.

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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.

Training

Upon initial roll-out of the Policy, all current personnel, trainees and medical staff should be trained and complete attached form and deliver the completed forms to Human Resources / Medical Services / Medical Education and Research in an envelope labeled Employee Policy Training Certification."

New personnel, trainees and Medical Staff should be trained immediately upon hiring and complete this form and kept in their respective 201 file in Human Resources, Medical Services or Medical Education.

Responsibilities:

Compliance Department regularly reviews, and modify as necessary, this policy at least every 3 years and recommend to Leadership and MDI Board of Directors any modification.

Human Resources - Learning and Development Department / Department Manager or Quality, Safety and Compliance Officer of concerned department in coordination with Compliance Department provides regular training and annual refresher course to hospital personnel and third party services within their area of responsibility.

Managers and supervisors are responsible in ensuring that all their staff are aware and implement this policy consistently. In the review of any violation of this policy, managers and supervisors may be held liable for failure to instruct adequately their subordinates or for failure to detect noncompliance with applicable policies and legal requirements, where reasonable diligence would have led to the discovery of any violations or problems and prevent loss for the company.

Attachment: Appendix A: Gift Registry Form

Reference/s: Adopted from MPHHI Donations, Sponsorships and Grants Policy.

Adopted from MPHHI Gift and Hospitality Policy.

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Signatories:

(original document signed)

Author (s) **Mary Milagros D. Uy, MD**
Compliance Officer

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Reviewed and Recommended for Approval,

(original document signed)

Atty. Pilar Nenuca P. Almira
President and CEO

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