

FIRST GEN CORPORATION
Policy on Conflict of Interest

First Gen Corporation (the “Company”) is one with the Lopez Group of Companies in upholding the principles of honesty, integrity, and transparency in conducting business. In line with this, the Company expects its directors, officers and employees to act in a fair and judicious manner, and keep the Company’s interests in mind at all times.

Since the Company directors, officers and employees owe a duty of loyalty to the Company and its shareholders, they shall ensure that they do not have any business interest or activity that will tend to interfere with the proper performance of their duties and functions. Any potential conflict of interest shall immediately be disclosed.

A conflict of interest shall be considered material if the personal or business interest is or tends to be disadvantageous to the Company, such as when a director, officer or employee stands to personally acquire or gain financial advantage at the expense of the Company.

If an actual or potential material conflict of interest should arise, the matter should be immediately reported to the following persons for proper investigation and resolution, and the implementation of corrective action:

- a. immediate supervisors, in the case of employees;
- b. senior management, in the case of officers; or
- c. the board of directors, in the case of senior management and directors.

Any act or attempt to act in violation of this policy shall be treated seriously and dealt with appropriately and swiftly. In handling any case of such nature, the Company shall be guided by the Company Manual on Corporate Governance, Company Code on Employee Discipline, and other relevant laws and regulations pertaining to the said subject.

The procedure for reporting and the protection afforded by the Company Whistleblower Policy shall apply in each reported instance of violation of this policy.

APPROVED:



FRANCIS GILES B. PUNO
President & COO