MINDORO TEACHERS' MUTUAL AID SYSTEM, INC.
Marcelo H. Del Pilar St., San Vicente East Calapan City, Oriental Mindoro
0917-886-1899

CODE OF BUSINESS CONDUCT AND ETHICS

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Mindoro Teachers' Mutual Aid System, Inc. (MINMAS) was incorporated and granted juridical personality by the Securities and Exchange Commission on September 5, 2012. Its primary purpose is to foster brotherhood and mutual assistance, and to provide financial assistance to the beneficiary or beneficiaries of a deceased member.

The mission of Mindoro Teachers' Mutual Aid System, Inc. ("MINMAS" or the "Association") is to provide valuable assistance to its members and their dependents, treat all members fairly and equitably in the provision of benefits, and respond promptly to their changing needs and concerns through the continuous improvement and enhancement of its assistance and services for their welfare.

This Code of Business Conduct and Ethics (the "Code") sets forth the Association's core values and provides guidelines for applying these values in its operations and processes. It establishes standards of conduct for the Board of Trustees, officers, management, members, and employees, as well as the mechanisms for implementation and monitoring. All concerned are expected to uphold, observe, and comply with the values and provisions of this Code at all times.

The following are the fundamental standards of business conduct and ethical behavior expected within the Association:

A. COMPLIANCE WITH LAWS, POLICIES, AND GUIDELINES

The Association is committed to conducting its activities with integrity and in accordance with the laws of the Republic of the Philippines, as well as the internal policies and guidelines established by the Association.

All officers and employees are expected to understand and observe the laws, policies, guidelines, rules, and regulations applicable to their respective roles and responsibilities. If there is uncertainty as to whether an action is permitted under applicable law or Association policy, guidance should be sought from the appropriate officers or authorized representatives of the Association before proceeding.

All officers and employees share the responsibility to help prevent and promptly report any suspected or actual violation of applicable laws or Association policies through the appropriate channels.

Any officer or employee found responsible for misappropriation, falsification, or other related financial irregularities shall be subject to appropriate administrative action and/or legal remedies, in accordance with applicable laws and the Association's policies and procedures.

B. RESPECT FOR OTHERS

The Association is committed to maintaining a workplace where every individual is treated with dignity, respect, and fairness. A respectful working environment encourages personnel to contribute their abilities and perform their responsibilities effectively, supporting the continued development and objectives of the Association.

The Association upholds equal employment opportunity and is committed to providing a workplace free from discrimination, harassment, bullying, and any form of abusive, offensive, or retaliatory conduct. All personnel are expected to contribute to an environment where individuals are treated fairly and with respect.

All personnel shall conduct themselves with professionalism, courtesy, and fairness in their interactions with colleagues, members, and other individuals they encounter in the performance of their duties.

C. CONFLICTS OF INTEREST

Employees shall avoid actual, potential, or perceived conflicts between their personal interests and those of the Association. In performing their duties and dealing with members, fellow employees, and other stakeholders, employees shall always act in the best interests of the Association. Personal interests or relationships must not influence decisions affecting the Association and its members.

Employees shall not use their position, Association property, or confidential information for personal gain or take advantage of opportunities arising from their official duties without prior approval from the Board of Trustees and/or Management.

Employees are expected to protect the interests of the Association, uphold fairness in serving its members, and avoid actions that may result in personal benefit at the expense of the Association.

D. PROPER CONDUCT AND PROFESSIONAL BEHAVIOR

The Association expects all personnel to show respect toward its officers, members, colleagues, and other stakeholders. The misuse or abuse of authority or position to obtain personal benefit, favor, or an unauthorized advantage is strictly prohibited.

The Association is committed to maintaining a professional work environment. Employees are expected to avoid relationships or conduct in the workplace, including relationships involving employees, members, or personnel of affiliated entities, that may result in favoritism, a conflict of interest, or damage to the Association's reputation. Any such matter shall be addressed in accordance with applicable laws and the Association's policies and procedures.

Employees shall observe professional conduct and decorum both within and outside the workplace, particularly when acting for or representing the Association.

E. ACCURATE BOOKS, RECORDS, AND ACCOUNTS

Every employee is responsible for maintaining the accuracy and reliability of the Association's business records. These records are essential to the Association's operations and to compliance with applicable legal, regulatory, and financial reporting requirements.

Any employee who prepares, processes, or submits information for business records, regulatory reports, or financial statements shall ensure that the information is truthful, accurate, complete, legible, and submitted on time. Entries and reported information must be supported by appropriate and sufficient documentation.

F. The Board of Trustees, Management, and employees are expected to:

1. Listen to the needs and concerns of our members and make every reasonable effort to address them in accordance with the Association's mission.
2. Pursue excellence and innovation while demonstrating respect, professionalism, and prompt service to our members and stakeholders.

3. Foster an inclusive working environment that promotes diversity, fairness, equal opportunities, and active participation.
4. Value and recognize the individual efforts, contributions, and achievements of our employees.
5. Maintain the confidentiality of sensitive information concerning the Association, its members, stakeholders, Board of Trustees, and employees.
6. Observe and comply with applicable Philippine laws, rules and regulations, and fiduciary responsibilities to uphold transparency and accountability in all Association operations.
7. The Board of Trustees shall exercise sound, objective, and independent judgment, free from personal interests or bias, and provide proper oversight of the Association's operations.
8. Refrain from soliciting or accepting commissions, gifts, payments, loans, promises of future benefits, or anything of value from individuals or entities seeking or receiving benefits from the Association, except for nominal gifts or tokens consistent with customary business courtesy and Filipino hospitality.
9. Uphold and comply with the governing documents, By-Laws, and established policies of Mindoro Teachers' Mutual Aid System, Inc.
10. Take responsibility for complying with this Code and provide full cooperation in any internal investigation, examination, or audit.
11. Conduct oneself with integrity and uphold the highest ethical standards at all times, always acting in the best interests of the Association, its members, employees, and other stakeholders.
12. Give proper recognition and acknowledgment to individuals and organizations whose contributions support the achievement of the Association's objectives.
13. Refrain from using misleading, deceptive, or dishonest practices in recruiting prospective members.
14. Avoid engaging in lobbying activities that may compromise the integrity, independence, or reputation of the Association.

G. COMPLIANCE, MONITORING, AND REPORTING

The Association shall ensure that this Code of Business Conduct and Ethics is properly communicated to the Board of Trustees, officers, management, employees, and other individuals covered by its provisions. Management shall oversee the implementation of this Code and monitor compliance with its requirements. All covered individuals are expected to understand their responsibilities under the Code and observe its provisions in the performance of their respective roles.

H. REPORTING OF VIOLATIONS AND WHISTLEBLOWER PROTECTION

All individuals covered by this Code are expected to promptly report any actual or suspected violation of this Code, applicable laws, or the Association's policies and procedures through the reporting channels or to the authorized officers or representatives designated by the Association.

Reports should be made in good faith and, whenever possible, include sufficient details to allow the concern to be assessed. The Association shall handle reports discreetly and protect the identity of individuals who report concerns in good faith to the extent practicable and permitted by law. Retaliation, intimidation, harassment, or other adverse action against a person for making a good-faith report or participating in an authorized inquiry is prohibited.

I. INVESTIGATION AND DISCIPLINARY ACTIONS

Reports of alleged violations shall be assessed and, when warranted, investigated by persons or offices duly authorized by the Association. Investigations shall be conducted fairly, objectively, impartially, and with due regard for confidentiality. Individuals concerned shall be given a reasonable opportunity to explain their side, consistent with applicable laws and the Association's established procedures.

If a violation is substantiated, the Association may impose appropriate corrective or disciplinary action, taking into account the nature and seriousness of the violation and the circumstances involved. Any action shall be imposed by the authority duly authorized under the Association's governing documents, applicable laws, and internal policies and procedures.

J. CONFIDENTIALITY AND DATA PRIVACY

All individuals covered by this Code shall safeguard confidential, proprietary, financial, operational, and personal information obtained or accessed in connection with the Association. Such information shall be accessed, used, stored, retained, disclosed, and disposed of only for legitimate and authorized purposes and in accordance with applicable laws and the Association's policies.

Personal information relating to members, beneficiaries, employees, and other stakeholders shall be handled with due care and shall not be disclosed to unauthorized persons or used for personal purposes. The obligation to protect confidential information continues after an individual's employment, service, or other relationship with the Association ends, subject to applicable law.

K. GIFTS, BRIBERY, AND IMPROPER BENEFITS

Individuals covered by this Code shall not offer, solicit, give, or accept bribes, kickbacks, commissions, or other improper payments or benefits intended to influence, or that may reasonably appear to influence, a decision or action involving the Association.

Gifts, favors, entertainment, or other benefits shall not be offered or accepted when they may create an actual, potential, or perceived conflict of interest, impair impartial judgment, or result in an improper advantage. Any customary or nominal business courtesy must be consistent with the Association's policies and must not compromise the integrity or independence of the recipient.

L. EQUAL APPLICATION OF THE CODE

This Code applies to the Board of Trustees, officers, management, employees, and other individuals covered by its provisions, according to their respective roles and responsibilities within the Association. All covered individuals are expected to observe its standards of honesty, integrity, accountability, and ethical conduct.

No individual shall be exempt from compliance with this Code by reason of position, length of service, personal relationship, or authority. The Code shall be applied consistently and fairly, without favoritism, and in accordance with the Association's governing documents, applicable laws, and established policies and procedures.

AMENDMENTS

This Code may be amended or revised by the Board of Trustees whenever necessary. Any changes shall be properly approved and communicated to all concerned.

EFFECTIVITY

This Code of Business Conduct and Ethics shall take effect immediately and shall remain in force unless subsequently amended, revised, or repealed.