



# Millennium Global Holdings, Inc.

## CODE OF BUSINESS CONDUCT & ETHICS OF MILLENNIUM GLOBAL HOLDINGS, INC.

This Code of Business Conduct and Ethics (the “Code”) of **MILLENNIUM GLOBAL HOLDINGS, INC.** (the “Company”) shall guide the actions of the directors, officers, employees and other stakeholders of the Company in all dealings, transactions and activities involving the Company, its directors, officers, and employees.

### **I. Conflict of Interest**

- (1) A director of the Company should not use his/her position to profit or gain some benefit or advantage for himself/herself and/or his/her related interests. He/She should avoid situations that may compromise his/her impartiality, and ensure that personal interest does not affect the decisions of the Board. If an actual or potential conflict of interest may arise on the part of a director, he/she should fully and immediately disclose it and should not participate in the decision-making process.
- (2) Each employee of the Company has a responsibility to the Company to avoid situations where a conflict of interest might occur.
- (3) Employees are required to disclose to the Company any interest or benefits they have, or received, that may conflict with the business or interests of the Company.
- (4) Employees are expected to devote their full attention to their work and to the business interests of the Company. They are prohibited from engaging in any activity that interferes with the performance of their responsibilities to the Company or is otherwise in conflict with or prejudicial to the interest of the Company.
- (5) Employees are prohibited from accepting simultaneous full-time employment with another company; or with a supplier, customer, or competitor, and from taking part in any activity that promotes or aids the position of the competitor. They are strongly discouraged from accepting part-time work which will interfere with their work or which may represent a conflict of interest.

### **II. Conduct of Business and Fair Dealings**

- (1) The Company expects all employees to exercise honesty, integrity, good faith and fair judgment in the performance of their work, and in all their transactions, dealings, and communication, within or outside the business organization.

- (2) Employees are prohibited from giving and receiving bribes, kickbacks or compensation to and from government officials; government employees; business partners, such as suppliers, contractors, and customers; or other stakeholders of the Company.
- (3) Employees shall not offer, give, offer or promise anything of value, directly or indirectly, to any person or entity for the purpose of inducing any government official or employee for any illegal or improper purpose in connection with the performance of their work, and in all their dealings and transactions.
- (4) These standards apply to employees while working on company premises, at offsite locations, at company-sponsored business and social events, or at any other place where the employee is a representative of the Company.

### **III. Receipt of Gifts from Third Parties**

- (1) Under no circumstances may employees ask for, take or accept any offer, payment, service, loan, favor, money, gift, or anything of value from customers, vendors, consultants, etc. that is perceived as intended, directly or indirectly, to influence any business decision.
- (2) Any and all gifts received by an employee in his/her capacity as an officer or employee of the Company, or in due to the performance of his/her functions, must be disclosed and surrendered to the Human Resources Department (HRD) for proper disposition

### **IV. Compliance with Laws and Regulations**

- (1) The directors, officers including the managers, and employees of the Company, must have knowledge, information and familiarity of the statutory and regulatory requirements that affect the Company and its business. They must keep themselves informed and updated of any development in the laws, rules, and regulations that affect the Company and its business.
- (2) Employees are expected to comply with the Philippine laws, which include laws on employment, labor, health and safety, discrimination, environment, trade practices, intellectual property, data privacy, financial reporting, bribery, corruption, anti-money laundering, and sanctions. They are required to disclose to the Company if they are formally charged, or involved, with violating a law or are found to be guilty thereof.
- (3) Directors, officers and employees of the Company shall ensure that the operations and governance of the Company is in accordance with the national and local laws, regulations, and best business practices and good governance.
- (4) Whistle-Blowing – Any director, officer, manager, or employee of the Company may disclose in writing any concern on any violation or potential violation of the laws, policies,

standard operating procedures, business practices, accounting or auditing procedures of the Company. Any report shall be submitted the HRD or to the President of the Company. Reports and disclosures must be made in good faith and no false accusation shall be tolerated.

**V. Confidentiality**

- (1) Directors and employees should keep secure and confidential all non-public information, that he/she may acquire or learn by reason of his/her position. He/She should not disclose any confidential information without the authority of the Board of Directors of the Company.
- (2) Confidential Information includes, but is not limited to information with respect to the discoveries, ideas, concepts, designs, drawings, materials, specifications, techniques, models, data, documents, procedures, improvements, technology, intellectual property, budgets, projections, forecasts, financial data & information, customer information, business practices, personnel information, business plans, software, processes, business partners, sales and marketing and development plans and strategies, programming and engineering, methods and procedures, expressed, described or stored in any form provided by the Disclosing Party.

**VI. Use of Company Funds and Assets**

- (1) Employees are responsible for the proper utilization of the properties, monies, and assets of the Company and must safeguard the same against loss, damage, misuse, or theft.
- (2) Company properties and assets should be used for business purposes only, and shall not be used for personal purpose. Employees should likewise not allow other persons to use Company properties or assets, unless by virtue of a contractual arrangement or with the express authority of the Board of Directors.
- (3) Each and every employee is personally responsible for all Company funds over which he/she exercises control or under his/her possession. Company funds must be used only for business purposes and every employee must maintain accurate and timely records of each and every expenditure, submit proper liquidation and expense reports in accurate and timely manner. Employees must not use Company funds for any personal purpose.
- (4) Employees provided by the Company with equipment or properties necessary for the performance of their job are expected to take care of the same, use responsibly and for business purposes only. They must take precautions to protect it from theft or damage. Upon resignation or separation from employment, such properties or equipment must be surrendered to the Company.

- (5) Directors, managers and employees shall prevent the use of the facilities of the Company in furtherance of criminal and other improper or illegal activities, such as but not limited to financial misreporting, money laundering, fraud, bribery or corruption.

**VII. CONFLICT RESOLUTION**

- (1) The Company shall encourage all employees to discuss to his/her immediate supervisor or to the President his/her grievances, complaints and concerns, without fear of retaliation.
- (2) The Company, through the HRD shall ensure that all complaints or grievances are addressed, resolved, and/or settled amicably.

**VIII. DISCIPLINARY ACTION**

Violation of this Code shall be subject to corrective action in accordance with the Manual and applicable labor laws.

Effectivity

This Code shall take effect upon approval.

Approved on December 17, 2024.

**YANG CHI JEN** (Sgd.)  
Chairman/ President and CEO

**JANINE G. MANZANO** (Sgd.)  
Compliance Officer