

HUMAN RESOURCES AND ORGANIZATION DEVELOPMENT	Page No. 1 of 2	
	Policy No. HROD-6.6.0-0	<u>New Addition</u>
	Date of Issuance July 29, 2011	Date of Effectivity August 15, 2011
Subject: <u>Gifts</u>		

#### I. POLICY STATEMENT

STI upholds fairness and credibility in all its transactions. As a matter of policy, STI prohibits Employees from obtaining anything of value, opportunities, or privileges from any person or entity with whom STI has official/potential business transactions.

#### II. OBJECTIVE

STI adopts this policy to provide guidelines and a standard approach on handling gifts.

This policy aims to enable Employees of STI to respond appropriately to situations involving gifts in any form or amount.


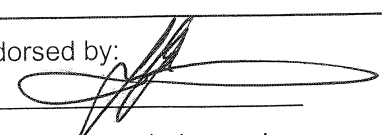
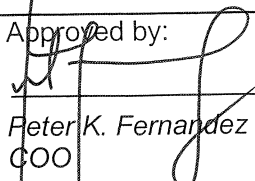
#### III. COVERAGE

This policy applies to all Employees of STI.

#### IV. GENERAL RULES

All employees who represent the company shall be beyond reproach, hence the following rules must be observed:

1. No Employee or member of his/her immediate family by consanguinity/affinity and friends (e.g. spouse or domestic partner, parents, children, siblings, mother-in-law, father-in-law, sons-in-law, daughters-in-law, sisters-in-law, brothers-in-law, uncles/aunts, nephews/nieces, cousins up to the first degree, paramours and/or concubines, classmates, neighbors, friends, etc.), shall solicit or accept from any person or entity, nor offer, nor give to any person or entity, anything of value or any other special consideration while doing or seeking to do business with STI.
2. No Employee who is offered anything of value is allowed to accept it. Gifts must be refused or returned to the person or entity in a tactful manner. In cases where it is inappropriate to refuse a gift, the Employee may accept it. In both cases, the Employee must inform the Supplier in writing of the company policy prohibiting its acceptance.
3. No Employee shall allow any influence, which could conflict with the best interest of the company or prejudice the company's reputation.

Prepared by:  Liezel Diego-Matias HR Manager	Endorsed by:  Atty. Jay Joseph Jamandre HR Head	Approved by:  Peter K. Fernandez COO
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#### V. GENERAL GUIDELINES

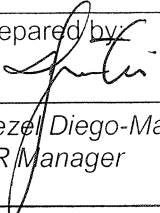
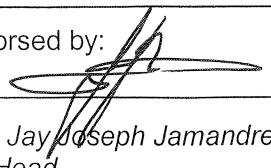
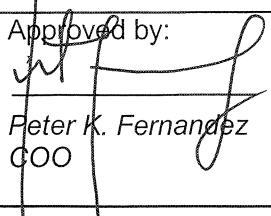
1. Though STI recognizes that business meetings may be necessary in establishing favorable business relationships, luncheons, dinners, and/or meetings with current and/or potential external suppliers, and/or business partners are discouraged to keep STI free from any unwarranted obligation. In such cases, Employees are encouraged to conduct meetings and conferences within company premises.
2. Promotional premiums and discounts from travel agencies, hotels, transportation companies and restaurants may be accepted if these shall ultimately result in a benefit to the company. Promotional items such as, but not limited to, desk calendars, diaries, pen holders or other items with value may also be accepted provided the items are clearly intended for promotional purposes.
3. All corporate gifts, including those which cannot be professionally refused, shall be surrendered to HROD.
4. Perishable items like vegetables, fruits and food items voluntarily offered and cannot be refused may be accepted provided that all information are disclosed to HROD.
5. Raffle/Game Prizes won while representing STI during events/functions shall be surrendered to HROD.

#### VI. Breach of Policy

Any Employee proven to have violated any of the provisions of this policy shall be accorded procedures, sanctions, and penalties as may be deemed proper based on appropriate company rules and the Company's Code of Conduct.

#### VII. POLICY REVISION

Policies, rules, and regulations not in accordance with this policy are deemed amended. STI reserves the right to adopt revisions to this policy if and when deemed necessary by management.

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