



PHILIPPINE INTERNATIONAL TRADING CORPORATION



ADOPTS AND IMPLEMENTS

NO GIFT POLICY

(PER GCG MEMORANDUM CIRCULAR NO. 2012-07, S. 2012)

The PITC Directors, Officers and Employees shall not solicit, nor accept, directly or indirectly, any gift, gratuity, favor, entertainment, loan or anything of monetary value (“Gift”) from any person where such Gift:

- (a) Would be illegal or in violation of law;**
- (b) Is part of an attempt or agreement to do anything in return;**
- (c) Has a value beyond what is normal and customary in the business of the Corporation;**
- (d) Is being made to influence the member of Board’s, Officer’s, or employee’s actions as such; or**
- (e) Could create the appearance of a conflict of interest.**