

**EnsureMePh Insurance Broker, Inc.
(InsuranceKo)
Code of Conduct**

Purpose

Conducting ourselves in accordance with the highest legal and ethical standards is a cornerstone of our business model as a social enterprise. We greatly value our reputation for honesty and integrity and believe that this reputation is one of our competitive strengths.

This Code of Conduct sets out InsuranceKo's expectations of how each and every employee should conduct himself/herself in order to uphold the reputation of InsuranceKo and forms a fundamental part of each employee's employment contract.

Scope

This Code of Conduct applies to EnsureMePh Insurance Broker, Inc. and its employees.

Core Values

Our Core Values lie at the very heart of this Code of Conduct, and when there is any doubt as to how you would apply this Code of Conduct to any situation, you should always think about the spirit of our Core Values.

Our Core Values are: Integrity, Customer Value, Excellence, Teamwork and Innovation. These Core Values must be at the heart of everything that we do as individual employees and as a company.

Standard of Conduct

Serve our Customers

Employees must never act in a manner that will diminish the reputation of InsuranceKo or the relationships that InsuranceKo has with its customers. Our reputation as a company that our customers can trust is one of our most valuable assets and we need to do everything we can to uphold that. In order to build trust with our customers, we need to put them at the heart of all we do – from product design to service delivery – and we must be clear and honest at all times in our communications with them.

Part of serving our customers better is establishing and maintaining good relationships with our business partners, as the quality and scale of our services to our customers often rely on such relationships. We value the successful relationships which we have established with our business partners and in order to maintain that, we need to be a trusted partner which consistently shows excellence through over-delivering on our promises.

Obey the Law

InsuranceKo takes its responsibilities to comply with laws and regulations very seriously and each of us is expected to comply with applicable legal requirements and prohibitions of the country in which we live and work. While it is impossible for anyone to know all aspects of every applicable law, you should understand the major and statutory laws and regulations that apply to your work, including taxation.

Bribery and Other Corrupt Behaviour

InsuranceKo has a strict Anti-Bribery and Corruption policy, which includes restrictions on giving or receiving gifts and hospitality. All employees are expected to understand and comply with such policy. InsuranceKo has zero tolerance for any breaches of such policy.

Insurance Regulations

As InsuranceKo operates in the highly regulated insurance industry, it is often subject to strict laws and regulations on how it carries out its business, including how it sells its policies, how it processes the data of subscribers and keeps it safe, how it collects and manages premium and claims monies and what services it can actually provide in each country. Each employee is encouraged to familiarise themselves with the relevant regulations that may impact on their work as breach of such laws and regulations may result in severe penalties for InsuranceKo or even imprisonment of the offending persons.

Data Protection

InsuranceKo holds and processes information about employees and its customers for administrative and commercial purposes. When handling such information, InsuranceKo, and all staff or others who process or use any personal information, must be aware of the relevant regulations relating to the processing or use of such information, including any restrictions on the transfer of such information and any security requirements on the storage or processing of such information.

Duties of Employees

As a minimum, employees must carry out the duties set out in the Annex to this Code of Conduct – many of such duties have been further detailed in this Code of Conduct. Local laws and regulations may require employees to carry out additional duties and employees are encouraged to be aware of what these are which are set in InsuranceKo's Employees Code of Conduct.

Protect Confidential Information

Employees agree and acknowledge that all information made available or otherwise provided to him/her in his/her capacity as an employee of InsuranceKo is confidential information belonging to InsuranceKo. No employee shall disclose such information to any third party in breach of InsuranceKo's Confidentiality Agreement, either during or after such employee's term of employment.

InsuranceKo's Intellectual Property Rights

All patents, rights in inventions, registered and unregistered design rights, copyrights, database rights and all other similar rights in any part of the world ("Intellectual Property Rights") in all information, records, documents and other materials (including copies and summaries thereof) which pertain to InsuranceKo and which are made available, developed or acquired by employees in the course of their employment shall be the property of InsuranceKo.

Relevant Procedure

Breaches of this Code of Conduct

This Code of Conduct has been drawn up to provide a source of guidance to the Company's employees and forms part of each employee's contract of employment. All employees must comply with both the provisions of this code and the Company's policies and procedures, breaches of which will be taken seriously and may result in disciplinary action or even legal action.

ANNEX A: Duties of Employees

The duties of InsuranceKo employee include the following (in addition to other duties required by local law):

- to be ready and willing to work;
- to do the work for which they are employed personally (e.g. not sub-contract their work);
- to take reasonable care in the exercise of that service, including the duty to be competent at work and to take care of the Company's property;
- to not wilfully disrupt the Company's business;
- to obey reasonable orders as to the time, place, nature and method of service;
- to work only for the Company in the Company's time;
- to disclose information to the Company relevant to the Company's business: for example that they might know or discover;
- to hold solely for the Company the benefit of any invention relevant to the business on which the Company is engaged;
- to respect the Company's trade secrets;
- in general, to be of good faith and do nothing to destroy the trust and confidence necessary for employment;
- to account for all benefits – monetary or in kind -received in the course of employment;
- to not give or receive bribes or otherwise act corruptly; and
- to indemnify the employer for loss caused by the employee