ACGS Level 1 PRIMARY CGS SECTIONS

C. Role of Stakeholders

 $C_{.1.1}$

Does the company disclose a policy and practices that address: the existence and scope of the company's efforts to address customers' welfare?

Response

YES. ICTSI continues to implement projects aimed at improving services for its customers.

Sources:

Company Website

Investor Relations click to open

Corporate Governance click to open

Policies and Practices click to open

Annual Corporate Governance Report

H. Role of Stakeholders, Customers' welfare, page 70 click to open

 $C_{1.2}$

Does the company disclose a policy and practices that address: supplier/contractor selection procedures?

Response

YES. In the selection of suppliers, ICTSI ensures that suppliers are selected based on their ability to meet contract requirements including quality system and any specific quality assurance requirements.

Source:

Annual Corporate Governance Report

H. Role of Stakeholders, Supplier/contractor selection practice, page 72

$C_{.1.3}$

Does the company disclose a policy and practices that address: the company's efforts to ensure that its value chain is environmentally friendly or is consistent with promoting sustainable development?

Response

YES. ICTSI (MICT)'s Integrated Management System (IMS) was reconfirmed by ISO 9001:2008 and ISO 14001:2004 issued by Certification International Philippines, Inc. (CI).

Source:

Annual Corporate Governance Report

H. Role of Stakeholders, Environmentally friendly value-chain, page 72 click to open

$C_{.1.4}$

Does the company disclose a policy and practices that address: the company's efforts to interact with the communities in which they operate?

Response

YES. ICTSI has sought ways to help communities where ICTSI terminals operate. These corporate social responsibility (CSR) policy, initiatives and program were institutionalized and expanded when ICTSI Foundation was established in 2010.

Among ICTSI's community projects were: solid waste management projects, medical missions, potable water system projects, assistance to the victims of Typhoon Lawin, scholarship programs, and disaster preparedness program.

Sources:

2016 Annual Report

Corporate Citizenship, page 22 click to open

Annual Corporate Governance Report

L. Corporate Social Responsibility Initiatives, page 98 click to open

$C_{.1.5}$

Does the company disclose a policy and practices that address: the company's anti-corruption programmes and procedures?

Response

YES. ICTSI strictly prohibits and penalizes the acts of receiving and/or soliciting or exacting monetary consideration from port users, company clients or the public in consideration of work.

Sources:

Annual Corporate Governance Report

7) Change/s in existing policies, Anti-Bribery Compliance Policy and Procedure (Policy), page 51

click to open

H. Role of Stakeholders, Anti-corruption programs and procedures, page 75 click to open

Company Website

Corporate Governance, Policies and Practices, page 2 click to open

$C_{.1.6}$

Does the company disclose a policy and practices that address: how creditors' rights are safeguarded?

Response

YES. ICTSI Group manages its liquidity profile to be able to finance its working capital and capital expenditure requirements including the timely servicing of debt, payment to suppliers and other corporate payables.

Sources:

Annual Corporate Governance Report

H. Role of Stakeholders, Safeguarding creditors' rights, page 75 click to open

Corporate Website

Corporate Governance, Policies and Practices, page 10 click to open

$C_{.1.7}$

Does the company disclose a policy and practices that address: does the company have a separate report/section that discusses its efforts on environment/economy and social issues?

Response

YES. ICTSI disclosed the activities and practices in addressing environment/economy and social issues.

Sources:

Annual Corporate Governance Report

L. Corporate Social Responsibility Initiatives, page 98 click to open

$C_{.2.1}$

Does the company provide contact details via the company's website or Annual Report which stakeholders (e.g. customers, suppliers, general public etc.) can use to voice their concerns and/or complaints for possible violation of their rights?

Resnonse

YES. ICTSI provides contact details via the company's website and Annual Report, which the stakeholders can use to voice their concerns and/or complaints.

Sources:

Company Website

Contact Us

click to open

2016 Annual Report

Investor Relations

click to open

$C_{.3.1}$

Does the company explicitly disclose the health, safety, and welfare policy for its employees?

Response

YES. ICTSI expressly discloses the health, safety and welfare policies for its employees, such as the proper wearing of uniforms and protective equipment.

Sources:

Company Website

Corporate Governance, Policies and Practices, page 11 click to open

Annual Corporate Governance Report

H. Role of Stakeholders, (a) Health and Welfare, page 76 click to open

$C_{.3.2}$

Does the company explicitly disclose the policies and practices on health, safety and welfare for its employees?

Response

YES. ICTSI publishes relevant information relating to training and development programs to its employees.

Sources:

Annual Corporate Governance Report

Dafety Training and Development, page 77 click to open

$C_{.3.3}$

Does the company have a reward/compensation policy that accounts for the performance of the company beyond short-term financial measures?

Response

YES. ICTSI's reward/compensation policy that accounts for the performance of the company beyond short-term financial measures ICTSI is driven by an organization of competent and dedicated workforce who are in partnership with their customers/clients and other stakeholders. These dimensions result in a decisive difference in the pursuit of service excellence and professionalism. To recognize this, ICTSI is committed to provide fair, timely and equitable compensation that values the comparable worth of jobs and the contribution of individuals.

Source:

Annual Corporate Governance Report

3) Performance - enhancing mechanisms for employees participation, (d) Company's reward/ compensation policy, page 82 click to open

Policies and Practices

ICTSI's Reward and Compensation Policy click to open

$C_{.4.1}$

Does the company have a whistle blowing policy which includes procedures for complaints by employees and other stakeholders concerning alleged illegal and unethical behaviour and provide contact details via the company's website or annual report?

Response

YES. If any employee or stakeholder has any concerns or become aware of any breaches of ICTSI's Code of Business Conduct or any other violations, he/she can report the violation immediately to his/her line manager, in case of an employee. For other stakeholders, he/she may send his/her complaint to the online platform provided in the ICTSI and MICT websites. The employee or the stakeholder may also notify the Corporate Legal Affairs or the Compliance Officer.

A complaint shall be taken cognizance of and due process shall be strictly observed giving the respondent every opportunity to explain his side and adduce evidence on his behalf. If the person being complained of is an employee, substantive and procedural due process shall be strictly observed prior to issuance of any disciplinary action.

Sources:

ICTSI Code of Business Conduct

3. Responsibility, page 4 click to open

Annual Corporate Governance Report

Whistle Blower click to open

4) Company's procedures for handling complaints, page 83 click to open

Form for Complaints and Online Inquiries

ICTSI Website click to open

Manila International Container Terminal (MICT) Website click to open

Glossy Annual Report click to open

C.4.2

Does the company have a policy or procedures to protect an employee/person who reveals illegal/unethical behavior from retaliation? Response

YES. Once a complaint is received, ICTSI conducts an administrative due process, which a separate investigation and does not rely solely on the report of an employee. Thus, the identity of the reporting employee is protected.

Sources:

Company Website

Corporate Governance, Policies and Procedures, page 14 click to open

Annual Corporate Governance Report

B. Code of Business Conduct & Ethics, (i) Whistle Blower, page 43 click to open