

## Code of Business Conduct and Ethics

| Business Conduct & Ethics                                   | Directors  | Senior Management | Employees |
|---|--|-------------------|-----------|
| (a) Conflict of Interest                                    | <p>LFM directors, senior management and employees are mandated to avoid positioning themselves in situations in which they may be a possible conflict of interest. All are reminded that their judgment and discretion should not be influenced by considerations of personal gain and benefit.</p> <p>It is the duty and responsibility of a director to conduct fair business transactions with the Company, and ensure that his personal interest does not conflict with the interest of LFM.</p>   |                   |           |
| (b) Conduct of Business and Fair Dealings                   | <p>LFM directors, senior management and employees are directed towards a liberal and progressive entrepreneurship. LFM espouses the reconciliation of the profit motive with services to the nation and humanity in general. LFM integrates its goals with the collective aspirations of the individual members of society so that both may fill the needs of the country and contribute progress of the human race. Thus, in all its dealings- it acts with fairness and integrity.</p>   |                   |           |
| (c) Receipt of gifts from third parties                     | <p>LFM allows the acceptance of gifts only during the Christmas Season. There is no restriction on the value of gifts received.</p>  |                   |           |
| (d) Compliance with Laws & Regulations                      | <p>LFM complies with the relevant and applicable laws and regulations, as imposed by the various governmental bodies, agencies and instrumentalities. Any deficiencies are immediately rectified. Moreover, the LFM directors, senior management and employees are directed to steer away from any and all overt and covert acts of bribery.</p>   |                   |           |
| (e) Respect for Trade Secrets/Use of Non-public Information | <p>LFM directors, senior management and employees who possess trade secrets and/or material non-public information are properly informed not to release any and all information with respect thereto to ensure that all non-public information will not be released to the public until the appropriate disclosures have been made to the SEC and PSE, in accordance with the SRC.</p> <p>Employees are expected to keep confidential data on products, business processes, strategies, systems or other important information during or even after employment with the Company.</p> |                   |           |
| (f) Use of Company Funds, Assets and Information            | <p>LFM directors, senior management and employees are directed to utilize LFM resources and assets with honesty and integrity. LFM ensures that the funds, assets and information of LFM are maximized and used for the furtherance of the Company.</p>  |                   |           |

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|  | <p>Employees are required to safeguard the Company's resources and assets with honesty and integrity. They must ensure that these assets are efficiently, effectively and responsibly utilized.</p>  |
| (g) Employment & Labor Laws & Policies | <p>The LFM Human Resource Department complies with the Philippine labor laws.</p> <p>The relationship between the directors and the Company is not covered by the Philippine labor laws.</p>   |
| (h) Disciplinary action                | <p>Disciplinary actions and sanctions are put into place and implemented when violations have been committed.</p> <p>Grounds for the removal or disqualification of directors are dealt with by the Board.</p> <p>The violation of company rules and regulations may result in the appropriate disciplinary action. If necessary, a violation may result in legal action against the employee, or otherwise, its referral to the appropriate government authorities.</p> |
| (i) Whistle Blower                     | <p>An employee may discuss or disclose any concern regarding a potential violation with the appropriate company officer.</p> <p>LFM does not tolerate retaliation (in any form) which increases or is an attempt to increase the suffering of work against an LFM director, senior management and employee who reports honesty and in good faith.</p>  |
| (j) Conflict Resolution                | <p>Any conflict concerning one or more directors is dealt with by the Board.</p> <p>Any conflict concerning Senior Management is dealt with by the appropriate officer, or if necessary, by the Board.</p> <p>Conflict resolution for employees is dealt with by management through the organizational and procedural structures including a grievance machinery.</p>  |

The Code of Ethics and Conduct has been disseminated to LFM directors, senior management and employees.