

Whistle-blowing Policy

The Company promotes an environment of trust and camaraderie amongst its various stakeholders. Nevertheless, in the pursuit of its commitment to ethical service, COL provides several avenues by which these persons can, confidentially, air personal grievances, or to report actions of their peers or superiors which are, or which in good faith they suspect to be, contrary to ethics, laws, or regulations.

Conflict of Interest Policy

A “conflict of interest” situation may arise when a person’s private interests interferes with the best interests of the Company.

All affiliated persons must ensure that his personal interest does not conflict with the interests of the Company. In particular, no employee shall engage in the same or similar line of business or function as that carried on by the Company. Financial interests held by an employee or by his immediate family members in another company with the same or similar business interest must be disclosed immediately to the Company so that a determination can be made as to whether a conflict of interest exists. It shall be at the sole discretion of the Company to either dismiss or continue with the employment of an employee who has engaged in activities that are in conflict with the Company’s business interest.

Insider Trading Policy

An affiliated person shall not buy or sell COL shares while in possession of material information about the Company that is not generally available to the public. Said affiliated person may only trade in COL shares two (2) trading days after the price-sensitive information is disclosed to the public.

Neither may the affiliated person concerned pass on material nonpublic information to others.

Related Party Transactions Policy

Transactions between related parties must be based on terms similar to those offered to nonrelated parties. The transactions are done in the normal conduct of operations and are recorded in the same manner as transactions that are entered into with other parties.

Health and Safety Policy

The Company provides a clean, safe, and healthy work environment. As part of its thrust to promote the well-being of its employees, the Company provides all regular employees with health insurance.

All affiliated persons are likewise expected to behave in accordance with the Company’s prescribed standards while within Company premises or during Company-sponsored events, regardless of the location where such events are being held.

For security reasons, the Company’s premises are monitored using CCTV cameras.