

SSI Group, Inc. Code of Business Conduct and Ethics

Compliance

All directors, officers and employees shall conduct business in accordance with all applicable Philippine laws and regulations.

All directors, officers and employees shall also adhere to all rules and standards contained in the Company's written policies, rules and manuals.

All directors, officers and employees are also enjoined to align their decisions and actions with the Company's core values of service, synergy, integrity, leadership, innovation, faith and excellence.

Fair Dealing

All directors, officers and employees shall act in good faith and with integrity at all times. Directors, officers and employees shall deal fairly amongst themselves and with the Company's customers, suppliers, partners, regulators and competitors.

Conflict of Interest

No director, officer or employee should use his position to profit or gain some benefit or advantage for himself and/or his related interests, or to have an interest adverse to that of the Company. Directors, officers and employees should avoid situations that may compromise their impartiality or loyalty to the Company. If an actual or potential conflict of interest arises on the part of a director, officer or employee, this must be fully disclosed by the individual involved and by any others who are aware of this conflict.

Securities Trading and Material Non-Public Information

Directors, officers and employees must maintain the confidentiality of material non-public information. Any director or employee in possession of material non-public information must not buy, sell or otherwise trade in SSI securities, until at least two (2) days after such material non-public information has been disclosed to the public.

Disclosure of material non-public information to the public shall be made through SSI's designated senior officers.

Anti-Bribery Policy

Directors, officers and employees of the Company shall not offer, promise or give bribes, whether monetary or in kind, in order to obtain or facilitate favors or business for the Company. Also, directors, officers and employees shall not request or accept bribes, whether monetary or in kind, from any person or organization. All directors, officers and employees shall comply with all applicable anti-bribery laws and regulations.

Gender Equality

The Company upholds the principle of gender equality in the workplace and in all areas of its operations by ensuring that all persons have the same opportunities, resources, benefits, rights and respect, regardless of gender, ethnicity or religion.

Whistle Blower Policy

An employee may discuss or disclose in writing any concern or potential violation of the Code of Business Conduct and Ethics or any concern or potential violation of the Company's Rules and Regulations, or any potential illegal acts with the Company's Compliance Officer and/or the Head of the Human Resources Department. Complaints may be brought up with the Compliance Officer and/or the Human Resources Department through a face to face meeting, or via e-mail, or anonymously, via letter addressed to those Offices.

All information received shall be held in strict confidence and all reports will be investigated. Any violations will be dealt with in accordance with the Company's Rules and Regulations.