



HUMAN RIGHTS POLICY

PLDT Inc. (the “Company”) recognizes its role in building a digital society that respects human rights and upholds the right of every Filipino to participate in economic, social, and cultural life. The Company supports internationally recognized human rights principles and ensures that business operations promote human rights.

1. OBJECTIVE

This Human Rights Policy (the “Policy”) aligns with the Company’s Code of Business Conduct and Ethics and prescribes guidelines with regard to respecting human rights in all business engagements with stakeholders in the workplace, marketplace, and community.

2. POLICY ALIGNMENT

The Company supports the principles set out in the following international instruments:

- United Nations Universal Declaration of Human Rights
- International Bill of Human Rights
- International Labor Organization’s Declaration on Fundamental Principles and Rights at Work
- International Covenant on Social, Economic, and Cultural Rights
- United Nations Global Compact Principles
- United Nations Convention on the Rights of the Child
- United Nations Declaration on the Rights of Indigenous Peoples
- United Nations Convention on the Rights of Persons with Disabilities

This Policy is not intended to replace, but shall serve as a supplement to existing Company policies and procedures, to the extent that they are not inconsistent with this Policy.

3. SCOPE

This Policy applies to all members of the Board of Directors (“Board”), officers, executives, supervisory and rank- and-file employees, consultants, and other contracted personnel. Similarly, the Company expects its suppliers, contractors, business partners, agents, representatives, distributors, and relevant joint venture stakeholders to observe the same human rights standards and principles set out in this Policy. The Company’s subsidiaries are enjoined to adopt a similar policy in their respective organizations to ensure compliance with applicable laws.

As set out in this Policy, the Company does not tolerate any form of violation of human rights. The foregoing individuals covered by this Policy shall be personally liable to any third party for any such violation, and the Company shall not in any way be responsible for such violations committed by the foregoing individuals.

4. GUIDELINES

4. 1. Operations, Products, and Services

4.1.1. Freedom of Expression

Through its products and services, the Company enables and promotes the rights of customers and end-users to freedom of expression and communication.

However, the Company shall implement the blocking or restricting of customer access to the Company's products and services in accordance with relevant laws, rules, regulations, and internal policies. Any such request should emanate from the relevant government authorities (e.g. the National Telecommunications Commission, among others) pursuant to their regulatory mandate, in aid of law enforcement, or to protect national security. The blocking of web addresses to prevent the proliferation of online sexual abuse and exploitation of children (OSAEC) and child sexual abuse and exploitation materials (CSAEM) shall be implemented in accordance with the Company's policies.

The foregoing measures are aimed to, among others, promote clean internet traffic, avoid service quality degradation and service interruption arising from cyber attacks, and combat various cyber security threats such as spam and malware.

4.1.2. Privacy Rights

The Company's [Privacy Commitment](#) sets out the general principles that govern the collection, use, and disclosure of customers' personal data and aims to ensure that the Company adopts and observes appropriate standards for customers' personal data protection in compliance with applicable privacy laws and regulations.

When the government requires sharing information of customers and other stakeholders pursuant to an ongoing investigation, the Company will comply with proper procedures for disclosure of data, i.e., disclosures are made only upon receipt of a lawful order of the court or through subpoena powers of law enforcement authorities.

4.1.3. Child Rights

Recognizing children as key stakeholders in the digital environment, the Company adopts the Children's Rights and Business Principles framework and upholds a **Child Safeguarding Policy** across its operations. This translates into institutionalized business practices, technology solutions, and strategic partnerships in pursuit of creating a safe online environment for children and preventing child labor.



The Company also maintains a Child Protection Platform solution that detects and blocks content-level access to online child sexual abuse materials within its network 24/7, consistent with the Philippine Republic Act (RA) No. 11930 or the “Anti-Online Sexual Abuse or Exploitation of Children and Anti-Child Sexual Abuse or Exploitation Materials Act.”

To continuously build its capacity and align with best practices against OSAEC and CSAEM, the Company maintains active memberships and multi-sector alliances with child rights advocates from the government, multi-lateral organizations, civil society groups, academe, and other relevant entities.

4.1.4. Safety by Design

Amid the rapidly evolving digital landscape, the Company follows internal controls and assessment procedures across the development of all products and services, and requires third party vendors developing products and services for the Company, to ensure compliance with local and global standards and relevant laws, regulations, and policies on customers’ personal data protection and welfare.

As the Company seeks to pursue and enable more digital solutions, emerging technologies, and virtual environments, including but not limited to Artificial Intelligence, the Internet of Things and the Metaverse, it continuously conducts personnel upskilling, capacity-building, consumer research, strategic partnerships, and benchmarking initiatives to fully optimize its value creation strategy and innovations design, while remaining mindful of the need to protect its customers. In accordance with the Company’s Code of Business Conduct and Ethics, risks are assessed and managed to mitigate any negative human rights impact.

4.1.5. Intellectual Property Rights

The Company fosters an environment that supports, protects, and respects intellectual property rights. As it enables the rights of customers to enjoy and access the arts, as well as benefit from digital content and materials linked to cultural heritage and scientific knowledge, among others, the Company enforces parallel usage terms that warrant use of services with respect to intellectual property rights and relevant laws on copyright, patent protection, and trademarks.

4.2. Employees

4.2.1. Diversity and Inclusion

The Company fosters a workplace environment that is free of unlawful discrimination and allows every employee to be treated with respect and dignity and be given equal opportunity regardless of race, regional affiliation, ethnicity, religion, gender, gender identity or expression, sexual orientation, family or marital status, genetics, appearance, disability, age, affiliations, social origin or political views.



The Company adheres to a **Diversity and Inclusion Policy** that defines standard guidelines towards promoting diversity and collaboration within its workforce and expresses its commitment towards zero tolerance of any kind of harassment, abuse, intimidation, retaliation, or prejudice among employees.

All human resources decision-making processes, including recruitment, job assignment, remuneration and benefits, training, and promotions, are based on objective criteria and adhere to the Human Resources Manual that upholds merit, qualifications, performance, competence and potential, as aligned with the Company's values, strategic objectives and requirements.

4.2.2. Health and Safety

The Company commits to adopting occupational safety, health and environment standards, as embodied in its [Occupational Safety, Health, and Environmental Commitments](#), for a healthy, safe and positive work environment for its employees.

The Company implements relevant policies and programs that promote, among others, occupational safety, including health hazard identification, risk management and control mechanisms, emergency preparedness, a drug-free workplace, mental health awareness, disease prevention and control, and participatory and consultative engagements with employees.

The Company provides comprehensive medical benefits, first aid and emergency medical services, learning and development programs, digital tools for productivity and collaboration, flexible and hybrid work arrangements, welfare facilities, personal protective equipment, workplace signages, and other initiatives that promote employee safety and well-being.

The Company endeavors to influence its suppliers, business partners and external providers to uphold legally mandated occupational safety and health standards, and environmental standards and ensure safe and responsible workplace conditions.

4.2.3. Freedom of Association, Collective Bargaining Agreement, and the Employee Voice

The Company upholds freedom of association and expression, as well as recognizes the right of its employees to organize and engage in collective bargaining negotiations, and peaceful assembly, and make use of relevant fora to discuss and address employee concerns.

4.2.4. Anti-Slavery, Human Trafficking, Sexual Harassment

The Company adopts a zero tolerance policy towards all forms of forced labor, human trafficking, slavery, child labor, and human rights abuses within its own operations and within its supply chain, consistent with its continuous compliance with Philippine laws and regulations, including but not limited to, the Magna Carta of Women (RA 9710), Anti-Sexual Harassment Act of 1995 (RA 7877), Anti-Rape Law of 1997 (RA 8353), Rape Victim Assistance and Protection Act of 1998 (RA 8505), Anti-Violence Against Women and Their Children Act of 2004 (RA 9262), An Act Strengthening the Prohibition on Discrimination Against Women With Respect to Terms and Conditions of Employment (RA 6725), and Safe Spaces Act (RA 11313).

4.3. Suppliers

4.3.1. Supplier Code of Conduct

The Company upholds a [Supplier Code of Conduct](#) that enforces compliance of suppliers and service providers with applicable laws and regulations and enjoins their commitment to align with and abide by its corporate governance and sustainability principles, covering human rights, labor, data privacy, intellectual property rights, environment, and anti-corruption guidelines, among others. These are communicated and included as a sign-off requirement during the Company's qualification and onboarding processes for suppliers and in the covering contracts which are subject to compliance monitoring and enforcement.

4.3.2. Responsible Sourcing and Conflict Minerals

The Company maintains responsible supply chain management practices and engages its suppliers and service providers to comply with international standards and regulations on responsible sourcing of raw materials, particularly to prevent obtaining metals like tin, tungsten, tantalum, and gold from conflict areas and countries with reported human rights abuses and concerns. Towards this end, suppliers and service providers are required to make ethical sourcing disclosure as part of accreditation and onboarding processes, subject to compliance monitoring and enforcement.

4.4. Communities

4.4.1. Digital Inclusion

The Company envisions to connect and empower every Filipino to fully participate in the digital society. It thus commits to continuously democratize access to digital technology by expanding its fixed and wireless networks nationwide, making its products and services accessible, affordable, safe, and secure, and undertaking initiatives that help narrow the digital divide and foster digital inclusion, especially among vulnerable sectors of society.

4.4.2. Anti-Bribery and Corruption

The Company follows a [Code of Business Conduct and Ethics](#) that upholds the principles of accountability, integrity, fairness, and transparency in all business decisions, actions, and engagements. It enforces a Policy on Gift-Giving Activities that prohibits employees and suppliers from directly and indirectly engaging in bribery, corrupt practices, and illegal activities. As a policy, transactions which are or may have the potential of being deemed as Conflict of Interest transactions are discouraged and must be avoided.

In the interest of transparency, the Company regularly discloses related party transactions and all employees are required to disclose conflict of interest on areas in which it may arise on an annual basis, and as frequently as the occurrence of a conflict of interest situation.

4.4.3. Indigenous Peoples Rights

The Company recognizes the diversity of cultures, customs, and values of all Indigenous Peoples (IPs) across the Philippines. It respects and acknowledges the rights of IPs towards preserving their cultures, traditions, institutions, and ancestral domains.

As the Company expands its network infrastructure, facilities may entail location and passage in areas inhabited and managed by IPs and Indigenous Cultural Communities (ICCs). Recognizing its potential operational impact on host ICCs, the Company conducts legally mandated dialogues, community consultations, and due diligence processes in the construction and operations activities of its network facilities in ancestral lands and domains.

4.4.4. Stakeholder Engagement

The Company follows a [Stakeholder Engagement Policy](#) that provides guidance for effective, strategic, and ethical conduct of business engagements, operations, and activities with key stakeholders. Such Policy acknowledges relevant interests and concerns of each stakeholder group and outlines corresponding engagement methods that uphold the Company's principles of accountability, integrity, fairness, and transparency.

Recognizing its vital role in the communities where it operates, the Company endeavors to maintain active engagement and consultations with the government and regulators, investors, customers, creditors, suppliers, civil society partners, and other stakeholder groups to fulfill its human rights commitments. Particularly in the context of rolling out its network facilities and conducting business activities across the country, the Company engages with stakeholders like homeowners, homeowners' associations, people's organizations, non-governmental organizations, and other local stakeholders that form part of the decision-making process when acquiring permits and access to sites. These engagements are all undertaken in compliance with the Company's corporate governance policies and sustainability principles.

5. CONTROLS AND GOVERNANCE

5.1. Due Diligence and Assessment

As a signatory to the United Nations Global Compact (UNGC), the Company commits to supporting the UNGC's Ten Principles on Human Rights, Labor Rights, Environment, and Anti-Corruption. The Company's human rights due diligence approach is aligned with the UN Guiding Principles on Business and Human Rights, which identifies and prioritizes the most salient human rights issues in connection with the Company's products, services, technologies, as well as creating strategies to manage risks and mitigate their adverse effects. The Company observes due diligence processes, including impact assessments, control measures, mitigation and tracking, employee training, and continuous stakeholder engagement, in accordance with applicable Company policies.



5.2. Communication

The Company values accountability, integrity, fairness, and transparency in its human rights work, reporting annually on its human rights impact and efforts, following its due diligence processes. To ensure that all its employees, partners, and other stakeholders are aware of this Policy, the Company seeks to identify, create, and support opportunities to promote better understanding of the Policy, both internally and externally, encourages them to act in a manner consistent with its human rights commitments, and discloses on its human rights progress in its Sustainability Report and other communication channels, e.g., e-mail, website, and annual reports.

5.3. Remediation and Grievance Mechanisms

The Company has established a standard reporting procedure through the line heads, supplemented by a Corporate Governance Whistleblowing Reporting Facility for the employees' confidential reporting of actual or potential Policy violations and human rights abuses. For external parties, in addition to official channels for customers, investors, media, and suppliers/contractors, it also maintains an email at CGOHotline@pldt.com.ph, accessible to external partners, including suppliers/contractors, to send in complaints and reports on potential human rights violations committed in course of the Company's business engagements and activities. These grievances undergo corresponding internal processes and mechanisms for investigation, due diligence, and enforcement.

The Company prohibits retaliation against reporters/whistleblowers and witnesses for raising concerns in good faith or cooperating in investigations.

5.4. Roles and Responsibilities

The Company endeavors to work across the entire business value chain to help meet the commitments in the Policy. The Governance, Nomination, and Sustainability Committee (GNSC) has overall strategic oversight for Management's implementation of the Policy. The GNSC is supported by a core Human Rights Working Group ("HR Working Group"), which consists of representatives from the Corporate Sustainability Office, the Corporate Governance Office, and the People Group, who shall collaborate with other responsible organizational units of the Company to ensure regular monitoring, assessment, mitigation, management, and disclosures of actual and potential risks and impacts on human rights, and as appropriate, the implementation of related initiatives or remediation measures by the organizational units under their respective areas of responsibility. The HR Working Group may be expanded to include representation from other functional units, as necessary.

5.5. Effectivity, Review and Amendment

5.5.1. This Policy shall take effect immediately, as approved by the Board of the Company on 30th January 2024.

5.5.2. The GNSC will review and recommend amendments to this Policy, as it deems appropriate, and any such amendments shall be subject to approval by the Board.

MANUEL V PANGILINAN (SGD.)

Chairman of the Board
President and CEO