



**EMPIRE EAST LAND HOLDINGS, INC.
COMPANY POLICIES**

BUSINESS CONDUCT & ETHICS	DIRECTORS	SENIOR MANAGEMENT	EMPLOYEES
(a) Conflict of Interest	<p>All directors should conduct themselves with honesty and integrity in the performance of their duties and functions to ensure a high standard of best practices for the Company (Section 2.2.6, Code).</p> <p>A director should conduct fair business transaction with the Company and ensure that his personal interest does not conflict with the interests of the company [Section 2.2.7 (i), Code].</p>	<p>The Company expects each employee to observe the highest standards of business ethics. An employee cannot engage in any activity that will create conflict or interfere with the performance of his responsibilities (Company Code of Discipline).</p>	<p>The Company expects each employee to observe the highest standards of business ethics. An employee cannot engage in any activity that will create conflict or interfere with the performance of his responsibilities (Company Code of Discipline).</p>
b) Conduct of Business and Fair Dealings	<p>All directors should conduct themselves with honesty and integrity in the performance of their duties and functions to ensure a high standard of best practices for the Company (Section 2.2.6, Code).</p>	<p>The Company expects each employee to observe the highest standards of business ethics. An employee cannot engage in any activity which would create conflict or interfere with the performance of his responsibilities (Code of Discipline).</p>	<p>The Company expects each employee to observe the highest standards of business ethics. An employee cannot engage in any activity which would create conflict or interfere with the performance of his responsibilities (Code of Discipline).</p>
c) Receipt of gifts from third parties	N/A	Receipt of gifts from third parties is not allowed.	Receipt of gifts from third parties is not allowed.

<p>(d) Compliance with Laws & Regulations</p>	<p>The Board shall ensure the Company's faithful compliance with all applicable laws, regulations and best business practices (Section 2.2.6, Code).</p>	<p>The Company, thru the Board, shall ensure the Company's faithful compliance with all applicable laws, regulations and best business practices (Section 2.2.6, Code).</p>	<p>The Company, thru the Board, shall ensure the Company's faithful compliance with all applicable laws, regulations and best business practices (Section 2.2.6, Code).</p>
<p>(e) Respect for Trade Secrets/Use of Non-public Information</p>	<p>The Company respects the proprietary ownership of trade secrets and observes the confidentiality of nonpublic information.</p> <p>A director should keep secure and confidential all non-public information he may acquire or learn by reason of his position as director. He should not reveal confidential information to unauthorized persons without authority of the Board [2.2.7 (vi), Code].</p>	<p>The Company respects the proprietary ownership of trade secrets and observes the confidentiality of non-public information.</p>	<p>The Company respects the proprietary ownership of trade secrets and observes the confidentiality of non-public information.</p>
<p>f) Use of Company Funds, Assets and Information</p>	<p>The Board shall provide sound strategic policies and guidelines to the Company on major capital expenses and, establish programs that can sustain its long term viability and strength. The Board shall periodically monitor the implementation if such policies and strategies, including the business plans and operating budget (Section 2.2.6, Code).</p>	<p>All employees are advised to take care of the property of the Company and treat it like his own asset. Careless use or intentional damage to Company property shall make an employee liable for damages (Code of Discipline).</p>	<p>All employees are advised to take care of the property of the Company and treat it like his own asset. Careless use or intentional damage to Company property shall make an employee liable for damages (Code of Discipline).</p>

(g) Employment & Labor Laws & Policies	The Board shall ensure the Company's faithful compliance with all applicable laws, regulations and best business practices (Section 2.2.6, Code).		
(h) Disciplinary action	The Code provides the grounds for permanent and temporary disqualification of a member of the Board.	Disciplinary actions are initiated, processed and violations of Company rules and regulations are handled in accordance with the Company's Code of Conduct.	Disciplinary actions are initiated, processed and violations of Company rules and regulations are handled in accordance with the Company's Code of Conduct.
(i) Whistle Blower	All information received from whistle blowers and/or anonymous sources are referred to the Grievance Committee of the Company which consists of the HR, Audit, and the Legal Department Head.		
(j) Conflict Resolution	One of the functions of the Board is to establish and maintain an alternative dispute resolution system in the Company that can amicably settle conflicts or differences between the Company and its stockholders and third parties (Section 2.2.6, Code).	Misunderstandings, differences in opinion and disputes among members of the Company are referred to the Grievance Committee (Code of Conduct).	Misunderstandings, differences in opinion and disputes among members of the Company are referred to the Grievance Committee (Code of Conduct).
<p>(k) Related Party Transactions</p> <ul style="list-style-type: none"> · Parent Company · Joint Ventures · Subsidiaries · Entities Under Common Control · Substantial Stockholders <ul style="list-style-type: none"> · Officers including spouse/children/siblings/parents · Directors including spouse/children/siblings parents · Interlocking director relationship of Board of Directors 	<p>The Company, in the normal course of business, enters into transaction with related companies primarily consisting of lease of properties and advances for real estate transactions, working capital requirements and other business related purposes. Rental for lease properties and interest on interestbearing advances are within market rates.</p>		
	<p>The Company has no related party transaction with a director/officer, their family, siblings or parents.</p>		

<p>(l) Health and Safety</p> <ul style="list-style-type: none">· Health –related issues	<p>The Company provides Medical/health insurance to its employees. It requires all employees to notify the HR Department of any health-related issues. Annual physical examination is being undertaken to ensure that all employees are fit to work . A leave of absence may be granted for medical reasons or upon doctor’s advice . The Company requires doctor’s clearance before the employee is allowed to be back to work after sickness.</p>
<ul style="list-style-type: none">· Safety	<p>The Company provides information to employees through regular internal communication. Each employee is expected to obey safety rules and exercise caution in all work activities. Employees who violate the safety standards, cause hazardous or dangerous situations, or fail to report, or where appropriate, remedy such situations, may be subject to disciplinary actions. In case of accident resulting to injuries, the Company provides immediate medical attention.</p>