

## CODE OF CONDUCT AND BUSINESS ETHICS

PHILCOMSAT HOLDINGS CORPORATION (“PHC”) recognizes the importance of institutionalizing its policies and practices on proper conduct and business ethics, as it applies to its directors, officers, consultants and employees. This Code of Conduct and Business Ethics encourages PHC’s culture of good governance and serves as a guide to PHC’s corporate values.

1. All directors, officers, consultants and employees play a role in promoting good governance practices, and shall perform their duties and responsibilities with professionalism, compliance, integrity, fairness, accountability and transparency.
2. All directors, officers, consultants and employees contribute to the success of PHC by understanding their duties and responsibilities and undertake to enhance the skills and knowledge necessary to perform their duties and responsibilities.
3. All directors, officers, consultants and employees shall continuously update their knowledge on laws, rules and regulations applicable to PHC, and shall familiarize themselves with PHC’s Articles of Incorporation, By-Laws, Manual on Corporate Governance and committee charters.
4. All directors, officers, consultants and employees shall always have the best interest of PHC and its stakeholders in mind when making decisions.
5. All directors, officers, consultants and employees shall only engage in fair business transactions and ensure that personal interest does not affect the exercise of their duties.
6. All directors, officers, consultants and employees shall avoid situations where conflicts of interest may arise. If the same is unavoidable, they shall immediately make the appropriate disclosure and refrain from participating in the discussions to keep the transaction on an arms-length basis.
7. In all matters requiring judicious action, all directors, officers, consultants and employees shall act with fairness by thoroughly evaluating the information available to them and seeking clarification on issues when necessary.
8. All directors, officers, consultants and employees shall observe the confidentiality of non-public information acquired by their position and may not disclose such information without the appropriate authority to do so.

This Code of Conduct and Business Ethics is immediately effective and shall be implemented in accordance with the Manual on Corporate Governance and the Code of Discipline of the Philcomsat Group of Companies.