

POLICY STATEMENTS

Policy on Whistleblowing

Benguet Corporation (the Company) is committed to upholding the law and the highest ethical standards in conducting its business. In this regard, all employees are encouraged to raise genuine concerns on possible transgressions or violations of the Company's code of conduct in a timely manner and at the proper venue.

The Company in turn will:

- 1) provide a transparent and secure process for dealing with concerns
- 2) ensure that such concerns are treated confidentially, seriously and appropriately
- 3) guarantee that anyone who raises a serious concern in good faith will be protected from retaliation

Workplace Safety

Benguet Corporation (the Company) is committed to the preservation of health, maintenance of good housekeeping in the work place, and safety and welfare of all its employees.

The Company is also committed to provide a safe and clean environment so that everyone can conduct business in an efficient and productive manner. The Company shall ensure that protective measures are in place and workplace safety programs are implemented, followed and enforced. All employees must be active participants in these safety programs.

Trading on inside information

Benguet Corporation (the Company) is a publicly-listed company subject to various laws and regulations governing trading in its securities by its employees, directors, consultants and contractors.

It is a criminal offence to deal with the securities of a publicly listed company based on Insider Information. Insider Information are information which are not generally available to the public and which could affect the market price of a listed security.

All employees, directors, consultants and contractors of the Company are required to comply with all applicable laws on trading on inside information. Violations or non-compliance may include criminal prosecution and fines for both Benguet Corporation and the individual.

Board of Directors and Key Officers Training Policy

Benguet Corporation through its Training Policy shall provide the appropriate orientation and development programs to its Directors and Key Officers.

Trainings and/or development programs for the members of the Board of Directors may include but shall not be limited to the following:

- Strategic Planning
- Board and CEO Performance
- Mining Operations
- Governance and Ethics
- Audit and Compliance
- Leadership
- Regulatory Environment
- Risk Management

Moreover, in compliance with the Philippine Securities and Exchange Commission (SEC) Memorandum Circular 20, Series of 2013, all BC BOD and Key Officers shall undergo Corporate Governance Training and Updates once a year.