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POLICY STATEMENT

The Company is committed to undertake all reasonable steps to ensure the health, safety and welfare for the best interest of our stakeholders and the communities where we live and work by complying with the provisions of law, industry rules and regulations, standards of independent accreditation bodies where the Company obtained accreditation, and contractual obligations.

OBJECTIVES



1. To provide the guiding principles to ensure health, safety and welfare of the Company's stakeholders.
2. To identify responsibility and accountability of every personnel and department in the organization to ensure the health, safety and welfare of stakeholders.
3. To integrate health and safety practices in all activities to ensure efficiency and quality of products and services.


SCOPE AND COVERAGE

This policy shall define the guiding principles and responsibilities for managing health, safety and welfare of the stakeholders of Robinsons Retail Holdings, Inc. (RRHI), its subsidiaries and affiliates.

DEFINITION OF TERMS

1. Ergonomics – an applied science concerned with designing and arranging things people use so that the people and things interact most efficiently and safely; also called biotechnology or human engineering.
2. Health – a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity;
3. Health and Safety Team – a team composed of qualified members determined and appointed by the Business Unit (BU) Head, Corporate Center Head, Corporate Human Resources (CHR) /BU Human Resources (BUHR) Head that will be created to help in the implementation and compliance monitoring of the policies and procedures on health, safety and welfare.
4. Residual risk – a threat that remains after an organization has implemented security controls to comply with legal requirements.
5. Safety – the state of being safe; freedom from the occurrence or risk of injury, danger, or loss;
6. Stakeholders – the Company's customers, employees, suppliers, financiers, government and business partners, including the communities and environment it

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operates in, all of whom are important to a successful business.

7. Welfare – availability of resources and presence of conditions required for reasonably comfortable, healthy, and secure living and work conditions;

GUIDING PRINCIPLES

1. The Company shall establish policies and procedures on managing health and safety compliant with the provisions of law, industry rules and regulations, standards of independent accreditation bodies where the Company has secured accreditation as well as contractual obligations for the welfare of its stakeholders.

2. Health, safety and welfare shall be integrated in the management of the Company such that all activities are considered with the perspective of prevention of all types of accidents and protection of stakeholders.

3. Systematic identification of hazards and risk assessments shall be performed to ensure that appropriate actions are taken to prevent or mitigate the same.

4. The Company shall establish emergency and contingency plans to address residual risks, to minimize threats and protect the interest of stakeholders.

5. Based on monitored health and safety performance and analysis of incidents, the Company shall undertake continuous improvement by designing and adapting processes, systems and work practices for better ergonomics and safety.


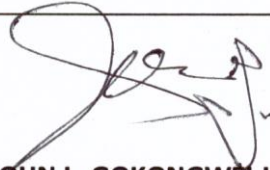
6. Employees regardless of management level shall promote the safety culture and shall be accountable for ensuring and managing workplace health and safety.


7. Safety culture shall be promoted by educating, training and equipping employees to ensure that they are empowered to avoid unsafe situations and be able to respond to unexpected events.

8. Goods and services shall be procured from accredited suppliers that have health and safety management in place.

9. Contractors and other third parties engaged by the Company should have sufficient relevant information and training and should be equipped to ensure health and safety.

10. To the extent practicable, health and safety information regarding the Company's operations shall be provided to the local communities where the Company operates.


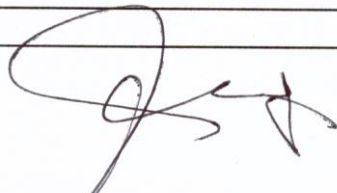
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11. In view of the diverse nature and organizational structure of businesses across the conglomerate, each Business Unit (BU) shall:
 - 11.1. Establish and monitor implementation of their respective guidelines and standards related to the delivery of products and services aligned and compliant with the Enterprise Policy;
 - 11.2. Ensure compliance and satisfaction of health, safety and welfare obligations required by the provisions of law and related to their industry, line of business and certifications from independent bodies.
12. The policy shall be reviewed and amended as necessary to take account of new legislation, advances in technology, and change in approaches to managing safety in a range of settings.

RESPONSIBILITIES


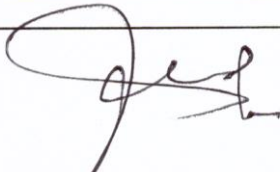
1. The Company recognizes and accepts its statutory responsibility to provide safe and healthy working conditions for employees, customers and other stakeholders who use and visit the Company's premises, patronize its establishments, shop or dine in its stores or may be affected by its activities. In general terms, this includes but is not limited to the provision and maintenance of:
 - 1.1. Plant, equipment and systems that are safe and without risks to health;
 - 1.2. Safe use, handling, storage and transport of raw materials and finished goods;
 - 1.3. Information, instruction, training and supervision that enables all employees to avoid risks and contribute to their own safety and health at work;
 - 1.4. A safe place to work, with safe means to enter and leave premises;
 - 1.5. A healthy working environment;
 - 1.6. Adequate welfare facilities.
2. Business Unit and Corporate Center Heads together with CHR and BUHR shall be responsible for ensuring that:
 - 2.1. Safe working practice is based on a sensible and proportionate risk assessment approach;


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approach;

- 2.2. Accident/incident procedures are followed;
- 2.3. Fire precautions and first aid provision are adequate and readily available;
- 2.4. Emergency procedures are well considered and enacted;
- 2.5. Information, instruction, training and supervision provided meets the needs of individuals to enable them to minimize risks and contribute to their safety and health and other stakeholders;
- 2.6. Statutory and other necessary examinations of equipment and installations are carried out;
- 2.7. Necessary certifications by independent accredited bodies are secured and provisions thereof are complied with;
- 2.8. Health, safety and welfare conditions and standards are monitored and reviewed in accordance with the requirements and guidelines set out in the Enterprise Policy.
- 2.9. A Health and Safety Team shall be created, should there be a need, to:
 - 2.9.1. Assist in the promulgation of safety awareness as well as implementation of Health and Safety policies and procedures;
 - 2.9.2. Provide periodic reports on the status implementation and compliance.
 - 2.9.3. Ensure proactive links with the enforcing authority, company unions, senior management;
 - 2.9.4. Ensure that key information is exchanged and passed on;
- 2.10. Recommendations and improvements in the Enterprise Policy are communicated to responsible personnel.
- 3. Health and safety is a shared responsibility. Everyone plays a part and all employees are required, as a condition of employment, to:
 - 3.1. Have a clear understanding that each employee has a responsibility for their own health and safety and that of others who could be affected by what they do or

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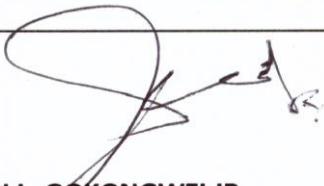
fail to do;

- 3.2. Have sufficient information, instruction and training about health and safety policies and procedures;
- 3.3. Take personal responsibility for their own safety, including correct use of protective equipment or safety work items in accordance with instructions, training and standards;
- 3.4. Become actively involved in programs that can help improve health and safety performance in the workplace;
- 3.5. Bring to the attention of their immediate superior any concerns or conditions detrimental to health and safety;
- 3.6. Report to their immediate superior or responsible person accidents and significant incidents as soon as possible;
- 3.7. Comply with the Company's health and safety policies and procedures;
- 3.8. Practice health and safety every day.
4. Corporate Internal Audit Department shall be responsible for checking, evaluating and ensuring that health, safety and welfare policies and procedures are adequate, efficient, observed and implemented as designed by management.

EFFECTIVITY CLAUSE

This policy shall take effect upon approval and shall continue to be in force unless superseded by new policies and guidelines.

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