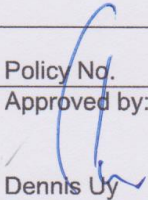
	Conflict of Interest Policy	
	Effective Date :	Policy No.
Prepared by:	Recommended by: Human Resources Department	Approved by:  Dennis Uy President & CEO

This document reiterates the company's existing policy, rules and expectations regarding Conflict of Interest.

I. SCOPE

This policy establishes rules to ensure the protection of the company's interests in business transactions or arrangements that might benefit the private interests of a director, officer or employee of the 2GO Group ("2GO"). This policy is intended to supplement the Company Code of Ethics, Conduct and any applicable laws governing conflict of interest.


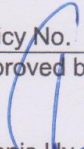
Vendors, suppliers, contractors, business partners, customers, and shareholders should align their dealings with this policy.

The 2GO Group, hereinafter called the "Company" refers to the following companies:

1. Negros Navigation Co., Inc. ("NN")
2. 2Go Group, Inc. ("2Go Group")
3. 2Go Express, Inc. ("2Go Ex")
4. 2Go Logistics, Inc. ("2Go Li")
5. Scanasia Overseas, Inc. ("SOI")
6. Special Container and Value Added Services Inc. ("SCVASI")
7. Other entities under the 2GO Group, Inc.

II. POLICY

Directors, officers and employees of 2GO in a position to exploit a professional or official capacity in any way for personal or corporate benefit or vendors, suppliers, contractors, customers and shareholders, must disclose to the company the existence of such, immediately upon becoming aware of the potential conflict of interest. Under the policy, any real or perceived conflict of interest, whether pecuniary or non-pecuniary which may affect the business of 2GO should be immediately disclosed to the company to enable the avoidance or in cases where the transaction or arrangement is deemed necessary by the company, the resolution of the conflict of interest.

	Conflict of Interest Policy	
	Effective Date :	Policy No.
Prepared by:	Recommended by: Human Resources Department	Approved by:  Dennis Uy President & CEO

III. DEFINITION OF TERMS

1. *Conflict of Interest* – a real or seeming incompatibility between one’s private interest and one’s public or fiduciary duties
2. *Pecuniary Interest* – an interest involving a potential financial gain or loss for any pertinent individual involved in a transaction.
3. *Non-pecuniary Interest* – any other vested interest not pertaining to financial gain or loss.
4. *Perceived Conflict of Interest* – the perception by an informed person that a conflict of interest exists or may exist.


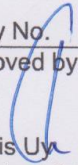
IV. DISCLOSURE OF INTEREST

All are required to disclose any financial or personal interest or benefit in any transaction involving 2GO to ensure that potential conflicts of interest are immediately brought to the attention of Management. Even the appearance of impropriety and the potential for conflict should be disclosed and avoided. Such may include but need not be limited to the following:

1. Interest in businesses of suppliers, competitors, or customers

This refers to any financial interest in the business of a supplier, competitor, or customer, whether publicly listed or privately held. Financial interest or management participation by an immediate family member needs to be disclosed as well.
2. Employment or analogous service in the business of a supplier, contractor, or customer

Engagement by such entities as a director, adviser, officer, employee, or consultant needs to be disclosed and requires approval by the Company. Engagement in such capacity of an immediate member of the family (parent, brother, sister, spouse, child) needs to be disclosed as well.
3. Engagement by other commercial enterprises or in a political office

	Conflict of Interest Policy	
	Effective Date :	Policy No. :
Prepared by:	Recommended by: Human Resources Department	Approved by:  Dennis Uy, President & CEO

Engagement in another occupation or provision of service to any other commercial enterprise, as well as holding of a concurrent position in government in addition to one's position in 2GO needs to be disclosed and requires approval by the Company.

4. Acceptance of gifts and entertainment

Gifts, entertainment, and travel of significant value may not be accepted from any supplier or customer of the company. Neither can an immediate family member or representative be designated to accept such on behalf of the employee. Significant value shall mean anything with a value of TWO THOUSAND PESOS (Php 2,000) and above.

5. Political activities

Active involvement in any political party or political campaign should be disclosed and requires permission from the Company.

6. Relatives in the same company


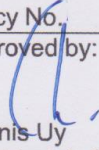
Disclosure should be made when an employee has a relative that is employed by the same company or **employed within the 2GO Group**. Management may exercise its discretion on such disclosure, but should avoid as much as possible situations where there will be relatives with a superior-subordinate relationship or in a control function exercised over the department of a relative.

In addition to the presence of relatives in such situations, employees should disclose any personal relationship when such begins to exist with another employee where one exercises a superior-subordinate relationship or control relationship with the employee.

7. Other examples of potential Conflict of Interest situations:

The following which may result in or create the appearance of using a relationship between employees, especially for supervisor-subordinate relationship, that may affect their integrity, independence and impartiality in the discharge of their functions – are disallowed:

- a. Financial accommodations through personal borrowings or requesting to be a co-maker for personal loan purposes and similar transactions;

	Conflict of Interest Policy	
	Effective Date :	Policy No.:
Prepared by:	Recommended by: Human Resources Department	Approved by:  Dennis Uy President & CEO

b. Standing as Sponsor for weddings or Godparent for baptisms.



8. PROCEDURES

In connection with any actual or possible conflict of interest, directors, officers or employees, vendors, suppliers, contractors, business partners, customers, and shareholders must disclose the existence of such and be given the opportunity to disclose all material facts to the company through a *Conflict of Interest Disclosure Form (attached)*. Upon receipt of the completed disclosure form, it is management's responsibility to determine whether there is a conflict of interest and thereupon address the conflict of interest.

9. VIOLATIONS

Those who have allegedly violated this policy, either upon failure to disclose an existing or potential conflict of interest to the company or failure to discontinue with activities comprising conflict of interest as advised by the company, will submit in writing an explanation for the reason behind the failure to disclose or discontinue the conflict of interest. Management will then evaluate the explanation and deem whether the reason be valid. Upon which, management will then decide the appropriate disciplinary and corrective action in accordance with law.

For inquiries, please contact the Human Resources Department.

	Conflict of Interest Policy	
	Effective Date :	Policy No.
Prepared by:	Recommended by: Human Resources Department	Approved by:  Dennis By President & CEO

Disclosure Form

Name:	Company/ Department:
Designation:	Date:

Please make a full account of all material information pertaining to the actual or potential conflict of interest.

This disclosure form is submitted in the interests of complete transparency and in compliance with the 2GO Conflict of Interest Policy.

By signing this Conflict of Interest Disclosure Form, I confirm that:

1. I have given a full account of the material facts;
2. The disclosures contained herein are true and correct to the best of my knowledge, information and belief; and
3. I acknowledge the authority of management to determine and impose the appropriate sanction in the event of any proven violation of or non-compliance with the 2GO Conflict of Interest Policy by me.

Signature: _____
Name: _____
Date: _____