	CHAPTER	CORPORATE GOVERNANCE
	SECTION	POLICY AND PROGRAMS
	SUBJECT	ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

I. POLICY STATEMENT

JG Summit Holdings, Inc. (“JGSHI” or the “Company”) shall continue to uphold its commitment to the highest standards of integrity as set out in the Company’s core values. It is the duty of the Company employees to avoid acts which might reflect adversely upon the integrity and reputation of the Company and to act with honor in every undertaking with all the stakeholders, upholding the principle of always doing the right thing because it is the right thing to do, even when no one else is watching.

II. OBJECTIVES

The objectives of this Policy are:


1. To strengthen and solidify the Company’s stand to maintain appropriate ethical and responsible business conduct and avoid all opportunities for bribery and corruption.
2. To provide and promote guidelines anchored on the Code of Business Conduct and Conflicts of Interest Policies of the Company so as to prevent the commission of bribery and corruption.
3. To set out clear limitations and stipulate guidance for Company employees on how to identify and deal with bribery and corruption issues.
4. To assert steadfast compliance with existing laws and regulations against bribery and corruption which include, but are not limited to:
 - 4.1. Revised Corporation Code (RA 11232);
 - 4.2. Ease of Doing Business and Efficient Government Service Delivery Act of 2018 (RA 11032);
 - 4.3. Presidential Decree on giving gifts to public officers (PD No. 46); and
 - 4.4. Anti-Graft and Corrupt Practices Act (RA 3019) and Revised Penal Code, as amended (Act No. 3815).

III. SCOPE AND COVERAGE

This Policy covers all acts of bribery and corruption as defined herein and shall be read in conjunction with JGSHI’s Code of Business Conduct, Conflict of Interest Policy and Whistleblowing Policy. This policy applies to all employees of JGSHI, as well as to their agents and representatives.

IV. DEFINITION OF TERMS

1. **Agent or Representative** – refers to any person who acts on behalf of, or who is authorized to commit a participant in a covered transaction.
2. **Bribery** – refers to the offering, giving, receiving, or soliciting of any item of value to influence his or her actions, the actions of the other employees or third party. This includes the offering or paying of facilitation payments.

	CHAPTER	CORPORATE GOVERNANCE
	SECTION	POLICY AND PROGRAMS
	SUBJECT	ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

3. **Corruption** – refers to the misuse of entrusted power for private gain. It is the act of doing something with an intent to give some advantage inconsistent with official duty and the rights of others, a fiduciary or official use of a station or office to procure some benefit either personally or for someone else, contrary to the rights of others. This may be done through the performance of fraud, collusion, embezzlement, money laundering and other deceptive or illegal activities.
4. **Employees** – in this Policy, refer to JGSHI employees, consultants, directors and officers.
5. **Kickback** – refers to the incentive paid to a person or third party who facilitated a transaction or for the preferential treatment in a decision-making process.
6. **Facilitation Payment** – refers to a payment to a public officer or third party to get approval for permits, licenses or other business activities or to expedite the processing of certain transactions.
7. **Suppliers or Contractors** – refers to third-party stakeholders who receives payment for the sale of goods or performance of service to JGSHI, including their agents or representatives.
8. **Third Party** – in this Policy, refers to an individual or organization (e.g. suppliers, contractors, distributors, agents, government officials and potential customers) that a JGSHI employee may encounter during the course of an official business.

V. GENERAL POLICY

1. JGSHI does not tolerate any form of bribery or corruption.
2. JGSHI employees shall observe caution regarding the giving, or receiving of gifts or hospitality.
3. All JGSHI employees as well as the Company’s contracted third party shall be responsible for the prevention, detection and reporting of bribery offenses and other forms of corruption, and are required to avoid any activity that may lead to a breach of this Policy.

4. Acts of Bribery and Corruption

The following shall be considered as prohibited acts of bribery and corruption:

- 4.1. Directly or indirectly seeking, accepting, offering or giving any payment, fee, loan, service or gift from or to another JGSHI employee or third party intended to influence judgment or create a feeling of obligation or as a condition or result of doing business with JGSHI;
 - 4.2. Expediting a routine procedure or performing official function for personal gain (e.g. accepting of kickbacks);
 - 4.3. Neglecting to perform official function or avoiding to perform standard procedure in exchange of receiving gifts or money; and
 - 4.4. Engaging in any activity that might lead to a breach of this Policy.
5. Only gifts consistent with JGSHI’s Code of Business Conduct and Ethics are permitted.

	CHAPTER	CORPORATE GOVERNANCE
	SECTION	POLICY AND PROGRAMS
	SUBJECT	ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

6. The following scenarios may indicate possible existence of corruption while dealing with third party particularly suppliers and contractors, thus, concerned groups are advised that the following shall be monitored.
 - 6.1. Frequent use of a product or dealing with suppliers with previous record of poor quality or performance;
 - 6.2. Transactions with unaccredited suppliers;
 - 6.3. Acceptance of inadequate or incomplete documents to support recommendation for supplier accreditation or awarding of project;
 - 6.4. Unexplained or unreasonable preference for certain suppliers or contractors; and
 - 6.5. Invitation from a third party for a private meeting hoping to tender for contracts.

7. Managers or Department Heads shall have full authority in the implementation of this Policy within their group. The measures shall be proportionate to the risks associated with their areas of responsibilities but may include:
 - 7.1. Ensuring that employees are aware of this Policy;
 - 7.2. Ensuring that employees participate in the anti-bribery and anti-corruption training;
 - 7.3. Implementing or maintaining internal controls that may ensure ways to detect and prevent any attempts of bribery and corruption, as well as to promote a culture of integrity within their groups.

8. Groups involved in dealing with third parties shall prepare and maintain documents and records (e.g. business proposals, expense report, quotations, etc.) relating to such dealings with strict accuracy and completeness. These documents and records shall be kept secured and available for inspection or future audit.

9. Sufficient due diligence shall be conducted to ensure compliance with this Policy. The following common threats shall be evaluated:
 - 9.1. JGSHI employees have personal relationships with a third party/ies;
 - 9.2. Requests for payment from a third party involve the use of cash or bank account not under the name of the Company or its owner authorized representatives;
 - 9.3. Government agencies which the Company does business with (e.g. getting permits; filing a document for regulatory compliance; etc.) recommend or insist on the use of a particular supplier;
 - 9.4. Third parties insist on unusual transacting procedures or refuses to identify its owners or request to falsify information; and
 - 9.5. Third parties do not have qualifications adequate to perform the required services.

10. **Reporting**

JGSHI employees shall immediately report any known bribery or corruption to their immediate supervisor, department head, a representative of Corporate Human Resources (CHR) or Conflicts of Interest Committee (CICOM) directly or through the different methods stated in the Whistleblowing Policy.

	CHAPTER	CORPORATE GOVERNANCE
	SECTION	POLICY AND PROGRAMS
	SUBJECT	ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

11. The procedures provided in the existing Whistleblowing Policy for reporting of incidents shall apply in each instance of reported bribery and corruption. A copy of the Whistleblowing Policy can be found on the JGSHI website at <https://www.jgsummit.com.ph/whistleblowingpolicy>.
12. JGSHI employees are enjoined to cooperate with any investigation in relation to this Policy.

VI. POLICY VIOLATION

Any violation of this Policy shall be dealt in accordance with the appropriate provision/s of the Company's Code of Conduct i.e., Offenses Subject to Disciplinary Action (OSDA). Any penalty imposed by JGSHI shall not prejudice any legal action or criminal case which may be filed against the erring employee or third party.

VII. AWARENESS AND EDUCATION

Trainings on anti-bribery and anti-corruption shall be regularly held by management. This will also form part of the onboarding materials of newly appointed directors and newly hired employees. This promotes JGSHI's thrust to greater awareness and extensive compliance of all employees to the Policy's objectives.

Other forms of information campaign shall be conducted in order to raise awareness among all concerned personnel, which includes keeping the Policy available in the Company website and regular email reminders.

This document and all related policies shall be posted in the Company's website, which can be readily accessed by any interested party.

VIII. EFFECTIVITY CLAUSE

This Policy shall take effect upon approval and shall continue to be in full force unless superseded by new policies and guidelines. The CICOM and Investigation Team shall formulate and finalize their respective internal rules of procedure for acting on matters and endorsements arising from this Policy. Failure of said units to finalize said rules of procedure shall not suspend the effectivity of this Policy.