



# COMPLIANCE MANUAL

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## I. OVERVIEW

Mr. John Gokongwei is the founder of **JG Summit Holdings, Inc. (“JGS” or “Company”)**, one of the largest and most diversified conglomerates in the Philippines with Universal Robina Corporation, a leading food and beverage company in the ASEAN and Oceania regions, as its largest subsidiary. Meanwhile, other corporations under its umbrella includes the following: (1) Cebu Pacific Air, the leading airline in the Philippines and one of the fastest growing low-cost carriers in the world; (2) Robinsons Land Corporation, a leading mixed-use property developer and operator of shopping malls, hotels, offices, residential buildings, as well as land and residential housing projects in key cities; (3) JG Summit Olefins Corporation, the first and only integrated petrochemical manufacturing operation in the Philippines; and (4) minority positions in PLDT, Inc., Manila Electric Company, United Industrial Corporation.

Aware of the dangers and costs of non-compliance with laws, rules, and regulations, the JGS has a Legal and Compliance Team under the General Counsel Group in order to assist the Company, and its subsidiaries and affiliates.

There are several groups handling compliance functions across the conglomerate. However, the Compliance Team under the JGS General Counsel Group (GCG-Compliance), composed of lawyers and non-lawyers, has the main role of providing expert and strategic legal advice and regulatory services to the JGS management to identify opportunities and proactive solutions that maximize legal advantage and eliminate or mitigate regulatory risks.

The function of GCG-Compliance is mainly on Corporate Governance (CG) within JGS. However, the team’s role is dynamic and adaptable, allowing it to handle a wide-range of compliance matters which depend on the plans of, and referrals it receives from, the Company, its subsidiaries, and affiliates. It conducts due diligence and assists in special projects, which cover any regulatory concern. Likewise, it conducts compliance review in targeted business units as well as areas of concern (i.e., permits, tax, labor, ownership, etc.), depending on the exigencies and demands at a particular time. The compliance review covers identifying possible issues and proposing resource-efficient options to resolve them, thus, preventing similar occurrences moving forward, and recommending the same resolutions to common issues across all the other businesses within the conglomerate, as maybe appropriate. As a result, the nature of GCG-Compliance's work evolves according to the ever-changing environment between government regulations and the needs of JGS and its businesses while ensuring that all rules and regulations, and its policies are observed.

Any work product of GCG-Compliance falls under and is protected by the Attorney-Client privilege that can be asserted against third parties because of its role.



## **II. COMPLIANCE SYSTEM**

The Compliance System is how JGS and, on a wider scale, all its businesses, learn about their compliance responsibilities and ensure that they are understood by their respective employees. The system is designed to specifically identify and mitigate business and other related risks. This includes the design and adoption of sound compliance policies and procedures and their effective implementation.

A full-time Chief Compliance Officer (CCO) is appointed by the Board to oversee the Compliance System and promote its effective implementation in JGS. The effectiveness of the JGS' compliance system relies on three (3) interdependent elements, which should be working together in managing compliance responsibilities as well as existing and potential business risks. These are: Board of Directors (Board) and Management oversight; Compliance Program; and Compliance Review.

### **A. BOARD AND MANAGEMENT OVERSIGHT**

The Board is the governing body elected by the Shareholders to exercise various corporate powers, including primarily the governance of the Company, and to provide an independent check on management. It has an oversight function and assures the continuing soundness, effectiveness and adequacy of the Company's control environment that consists of: (a) the Company that is properly and effectively managed and supervised; (b) Management that actively manages and operates the Company in a sound and prudent manner; (c) the organizational and procedural controls supported by effective management of information and risk management reporting systems; and (d) an independent audit mechanism to monitor the adequacy and effectiveness of the Company's governance, operations, and information systems, including the reliability and integrity of financial and operational information, the safeguarding of assets, and compliance with laws, rules, regulations and contracts.

The Management, also referred to as Key Officers, refers to a group of executives given the authority by the Board of Directors to implement the policies it has laid down in the conduct of the business of the Corporation. To enable the Directors to properly fulfill their duties and responsibilities, Management shall provide the Directors with complete, adequate, and timely information about the matters to be taken in their meetings.

The following are the duties and responsibilities of the Board and Management to demonstrate their commitment to overseeing the Company's compliance risk, maintaining an effective compliance system and in setting a positive environment for compliance, among others:



1. Board of Directors

- Ensures compliance program is in place and regularly updated;
- Ensures that compliance issues are avoided and/or resolved; and
- Appoints a Chief Compliance Officer to implement, monitor, and ensure compliance with the program.

2. Management or Key Officers

- Design and implement an appropriate compliance program;
- Ensure that employees of the Company adhere to the compliance program;
- Conduct compliance reviews to assess effectivity of the compliance program, report deviations to the Board and recommend courses of action to be taken to resolve them.

**B. COMPLIANCE PROGRAM**

**JGS** is committed in strengthening its culture of compliance throughout the Company and the conglomerate as a whole. This assurance is anchored on its leadership core value of integrity to act with honor in all its undertakings with all its stakeholders and upholding the principle of always doing the right thing because it is the right thing to do, even when no one else is watching.

Its compliance program, as approved by the Board, covers the relevant policies and procedures of JGS as well as the training, monitoring and review requirements, in order to ensure compliance with the laws, rules and regulations. It shall be updated to adapt to changes in the internal and external circumstances of the Company and new relevant regulatory issuances, as necessary.

This Compliance Program aims to ensure that all JGS employees adhere to all the relevant Philippine laws and regulations, company policies affecting corporate governance, the workplace, environment, and health and safety. It has the following components:

1. Compliance function (i.e., Revised Corporate Governance Manual (RCGM), the CCO's qualifications, reporting line, duties and responsibilities).
2. Procedures in ensuring the integrity and the accuracy of documentary submission to the regulatory agencies unless outside its function (i.e., reports from the Office of the Corporate Secretary to SEC, Office of the CFO to BIR, Data Privacy Office to NPC, etc.) provided laws or regulations do not require the submission by the CCO (i.e., Integrated Annual Corporate Governance Report [IACGR] to SEC).
3. Institutionalized compliance measures as necessary to the operations of JGS.



4. Training of employees on laws, regulations, and company policies unless such function on certain areas of compliance is already delegated to another group or business unit.
5. Monitoring level of compliance through compliance review.
6. Reporting of issues or observations and/or breaches in the compliance program to appropriate levels of management and to the designated Board-level Committee.
7. Clear and open communication process to educate employees and address compliance matters.

It is likewise the goal of JGS to have an institutionalized compliance program for every company within the conglomerate. Each business unit is encouraged to formalize its practices and have its own program, if it has not already done so, which shall suit its own requirements.

## 1. Compliance Function

The Board is assisted in its duties by the CCO. The appointment of a CCO is based on the RCGM which states that the Board may consider appointing a CCO with a rank of Senior Vice President or an equivalent position with adequate stature and authority in the Company. The CCO should not be a member of the Board and shall have direct reporting responsibilities to the Chairman of the Board. The CCO shall annually attend CG training.

The CCO has the following duties:

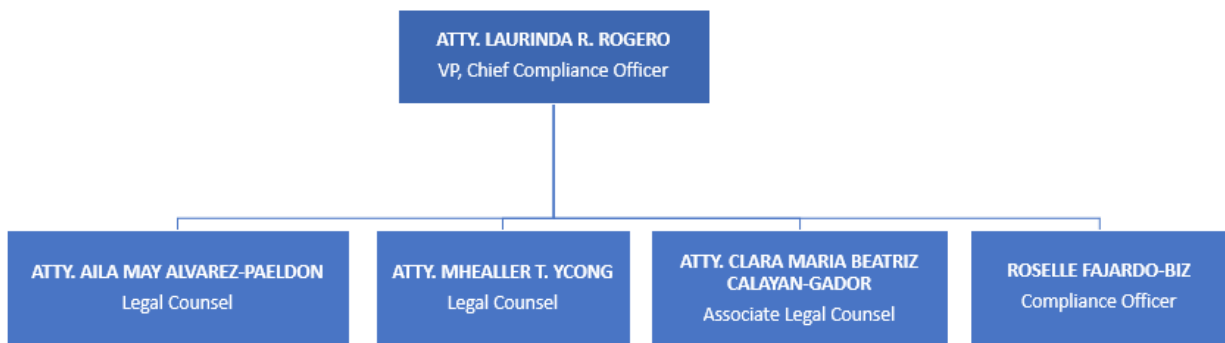
- A. Ensure proper onboarding of new Directors (i.e., orientation on the Company's business, charter, Articles of Incorporation and By-laws, among others);
- B. Monitor, review, evaluate and ensure the compliance by the Company; its Officers and Directors with the provisions and requirements of the RCGM and the relevant laws, the Code, rules and regulations and all governance issuances of regulatory agencies (i.e., through the IACGR);
- C. Report the matter to the Board if violations are found and recommend the imposition of appropriate disciplinary action;
- D. Ensure the integrity and accuracy of all documentary submissions to the regulators;
- E. Appear before the SEC when summoned in relation to compliance with the Code;
- F. Collaborate with other groups to properly address compliance issues, which may be subject to investigation;
- G. Identify possible areas of compliance issues and works towards the resolution of the same;



- H. Ensure the attendance of Board members and key Officers to relevant trainings;
- I. Assist the Board and the Corporate Governance and Sustainability Committee in the performance of the their governance functions, including their duties to oversee the formulation or review and implementation of the CG structure and policies of the Company, and to assist in the conduct of self-assessment of the performance and effectiveness of the Board, the Board Committees and individual Board members in carrying out their functions as set out in this Manual and the respective charters of the Board Committees; and
- J. Perform such other duties and responsibilities as may be provided by the Securities and Exchange Commission (SEC).

In the existing organizational structure, GCG-Compliance team is composed of the CCO, three (3) Lawyers and one (1) non-legal Compliance Officer.

## 2. Compliance Organizational Structure



All lawyers of GCG-Compliance are Legal Generalist/Multidiscipline (ALG000), providing a full range of legal advice and services. Their responsibilities are within the Legal Function as a generalist or in a combination of disciplines. However, the specific contact personnel for GCG-Compliance projects are as follows:

- a. Special Projects – Atty. Aila May Alvarez
- b. Compliance Review – Atty. Mhealler Ycong
- c. Corporate Governance – Atty. Bea Calayan-Gador

All non-lawyers or Compliance Officers are Legal Support/Generalist/Multidiscipline (ALS000) performing or supporting a variety of law-related activities that do not require a law degree, including legal or factual research, contract administration, document preparation and analysis, citation checking and trial preparation. Their responsibilities are within the Legal Support Function as a generalist or in a combination of disciplines.



### 3. Corporate Governance

Principally, GCG-Compliance's activities are focused on two areas: (1) Corporate Governance (CG); and (2) Special Projects.

In its pursuit to strengthen the culture of compliance within JGS, the following are the undertakings focused on fortifying its best practices in CG:

#### a. Integrated Annual Corporate Governance Report (IACGR)

It is an SEC Form used as a tool to disclose Publicly-Listed Companies' (PLCs) compliance or non-compliance with the recommendations provided under the Code of Corporate Governance for PLCs (CG Code) and to harmonize the CG reportorial requirements of the SEC and the Philippine Stock Exchange (PSE).

The IACGR rules follow the "comply or explain" approach. Simply, this means that companies either comply with the principles and guidelines set out by PSE or explain why these were not followed.

##### i. Requirements for Filing of the Report:

1. Three (3) copies of fully accomplished IACGR must be filed with the SEC Main Office on or before May 30 for every year that the company remains listed in the PSE.
2. At least one (1) complete copy of the IACGR shall be notarized and bear original and manual signatures.
3. The IACGR must be signed under oath by: (1) Chairman of the Board; Chief Executive Officer or President; (3) All Independent Directors; (4) Compliance Officer; and (5) Corporate Secretary.
4. The IACGR shall cover all relevant information from January to December of the given year.
5. All reports shall comply with the full disclosure requirements of the Securities Regulation Code.

##### ii. Role of GCG-Compliance and of the Proponents:

Every year in the month of March or earlier, GCG-Compliance shall initiate and coordinate with the Proponents (i.e., group or individual assigned to the specific area being referred to in the CG Code) on the disclosure of compliance or non-compliance with the recommendations provided under the CG Code. The team shall evaluate and collate all the replies from the Proponents. Thereafter, it shall obtain the requisite approvals from the Board and submit the fully accomplished IACGR within the deadline





set and in compliance with SEC requirements. Annually, GCG-Compliance shall review the replies and remediate or endeavour to resolve any non-compliant items, as necessary.

Meanwhile, the Proponents shall accomplish the IACGR recommendations, agreed or assigned to be within their scope, and correctly and accurately provide the appropriate replies and information required to be disclosed. They shall collaborate with GCG-Compliance and observe the instructions and timelines set, designed to ensure timely submission of the IACGR to SEC. In addition, each group shall ensure and be responsible for the correctness and accuracy of the disclosures or replies provided.

**b. Corporate Governance Section in the Annual Report and SEC Form 17-A**

GCG-Compliance shall coordinate with Corporate Strategy and Office of the Chief Finance Officer (CFO) or Controllershship, the leads for the Annual Report (Glossy/Online) and SEC Form 17-A, respectively, on the updating of the write-up or information required to be disclosed, depending on the timelines set by the latter. The team shall, as necessary, coordinate with the various groups to obtain the information or data required for the disclosure. It shall ensure that the write-up is accurate and consistent across all reports, relevant to the Corporate Governance Section, pertaining to the specific calendar year being reported.

**c. Governance Section in the Company Website**

GCG-Compliance shall own, manage, and regularly update the website according to the write-up it submits for the Annual Report (Glossy/Online) and SEC Form 17-A. The team shall coordinate with the various groups involved and ensure that information or documents relating to the Corporate Governance section on the website is up-to-date and in compliance with regulations. It shall coordinate with the Corporate Affairs and Sustainability Group for the uploading of the necessary information to the website relevant to the Governance Section.

**d. Online Self-Disclosure of Conflict of Interest**

GCG-Compliance shall initiate the Online-Self Disclosure Form (OSDF) within fifteen (15) working days after the end of the calendar year or from the date of the email notification from the Integrity and Ethics Council (IECON) Secretariat. An email notification, requiring compliance with the disclosure of any conflict of interest involving transactions for the preceding calendar year, shall be sent to all the employees of the Company.

Likewise, GCG-Compliance shall also coordinate with the Office of the Corporate Secretary for an email to be sent to the Board containing the soft copy of and the link to



the OSDF. The Board shall be provided with the option to either use the online link or send the hard or soft copy of the filled-up OSDF to GCG-Compliance or Office of the Corporate Secretary. Thereafter, GCG-Compliance shall evaluate the, and coordinate with IECON Secretariat on, the forms submitted by employees with a disclosed conflict of interest. GCG-Compliance shall follow the procedure in the Conflict of Interest Policy in the determination and resolution of cases of actual or potential conflict of interest. GCG-Compliance shall prepare the appropriate presentation materials and report the same in the next scheduled CGS Committee or Board meeting, as may be appropriate.

#### **e. Board Self-Assessment**

At the first Board or Committee meeting of the calendar year, GCG-Compliance shall inform the Board that they will be provided with the Self-Assessment Form (SAF) and shall present to them the guidelines on how to accomplish and submit the same. GCG-Compliance shall send the SAF via email either as a link or as an attachment for ease of access and completion of the SAF. The Board has the option to either use the online link or send the hard or soft copy of the filled-up SAF to GCG-Compliance or Office of the Corporate Secretary.

Thereafter, GCG-Compliance shall tabulate the result, prepare the appropriate presentation materials, and report the same in the next scheduled CGS Committee or Board meeting, as may be appropriate. GCG-Compliance shall ensure that the result of the assessment or in the alternative, a Certification, attesting to the fact that assessment was conducted, shall be posted in the appropriate Governance Section in the website.

GCG-Compliance shall ensure the inclusion in the budget of a provision for the engagement of a third (3<sup>rd</sup>) party service provider (e.g., Good Governance Advocates and Practitioners of the Philippines [GGAPP]) to conduct the assessment every three (3) years starting year 2022.

#### **f. CG Council Meeting**

Annually, GCG-Compliance shall initiate holding a meeting for all the CG representatives of the conglomerate. It shall discuss, among others, recommendations to strengthen CG compliance of the Gokongwei Group; training of the Board and Key Officers; changes in any law, rules and regulations; or any other matter relevant to CG.

#### **g. Training and Development of Board and Key Officers**

##### **i. Orientation for New Directors**



Every Director shall receive appropriate orientation when he/she is first appointed to the Board of Directors, to ensure that incoming Directors are appropriately apprised of their duties and responsibilities before beginning their Directorships. The orientation program shall include SEC-mandated topics on Corporate Governance (CG) and an introduction to the Company's business, Articles of Incorporation, and Code of Business Conduct.

Likewise, Management or Key Officers shall receive appropriate orientation on their duties as management executives and how to discharge these duties when they are first appointed to the Company. This will ensure that incoming Key Officers are familiar with the Company's business and governance processes.

### **ii. Mandatory Continuing Education**

Each Director and key Officer shall be required to attend a training program on CG and relevant topics every year. The training program shall ensure that Directors and Key Officers are continuously informed of the developments in the business and regulatory environments, including emerging risks relevant to the Company as well as CG matters including audit, internal controls, risk management, sustainability and strategy.

GCG-Compliance shall ensure that the Board and Key Officers comply with the orientation and mandatory continuing education or four (4) hours annual training requirement of SEC. It shall coordinate with all the subsidiaries of JGS to ensure they are given the opportunity to attend trainings conducted by the parent company. It shall be the responsibility of GCG-Compliance to coordinate with the Office of the Corporate Secretary for the scheduling of the training and to ensure that proper SEC accreditation and completion requirements for its Board and Key Officers are complied with. The application for accreditation of non-accredited speakers shall be submitted to the SEC at least one (1) month before the scheduled training date. After the training, GCG-Compliance shall assist the Office of the Corporate Secretary in the preparation of the completion requirements and submission to SEC within ten (10) days from the date of the training.

### **iii. Anti-Bribery and Anti-Corruption Training**

The ethical and behavioral standards that are expected of directors, officers and employees are set out and embodied in the Company's Code of Business Conduct (Code of Conduct), Anti-Corruption Programs, Company Policies and Offenses Subject to Disciplinary Action (OSDA), among others. The same are disseminated to all employees across the Company through trainings and advisories to embed them in the Company culture.



GCG-Compliance shall establish an annual training program either for live online training, video refresher on the Code of Conduct or any other activity that may comply with this requirement.

**h. Updating of Revised Corporate Governance Manual (RCGM), Code of Business Conduct and Other Relevant Policies**

GCG-Compliance shall coordinate with the Corporate Management Services to periodically review or update this Compliance Manual, RCGM, the Code of Conduct and other relevant policies (e.g., Anti-Bribery and Anti-Corruption, Board Diversity, Board Nomination and Election, Conflict of Interest, Insider Trading, Succession Planning, Whistleblowing) as necessary.

**i. iSpeak System Management**

The CCO, as part of the Integrity and Ethics Council (IECON) Secretariat shall coordinate the management of the iSpeak System (iSpeak) of JGS. iSpeak is the digital platform of JGS which is one of its designated tools or medium, where employee across the Gokongwei Group or external partners and/or stakeholders can securely share feedback, air complaints, and report on non-adherence to company values and policies. It is accessible via Employee Service Portal (ESS) and the Company website.

**j. Integrity and Ethics Council (IECON) Secretariat**

The IECON refers to the group composed of Corporate Human Resources (CHR), Corporate Internal Audit (CIA) and the General Counsel Group (GCG), designated by the Company to process the received complaints, conduct or endorse the investigation and to provide a report on the results thereof. The IECON Secretariat refers to the group designated by the IECON tasked to receive, perform preliminary evaluation and endorse the complaints to the IECON. The CCO, as part of the IECON Secretariat shall manage together with the designated IECON Secretariat members, the complaints or reports that are received from various channels of reporting. The IECON Secretariat shall provide a report as necessary to the IECON on the complaints received and assist the IECON in investigation and resolving the same. It shall also provide a report annually to the appropriate Board Committee on the activities of the IECON for the previous calendar year.

**4. Special Projects:**

**a. Referrals**



All regulatory concerns not related to CG shall be considered as a special project for purposes of this Compliance Manual. GCG-Compliance shall accept and handle compliance matters or regulatory concerns as may be referred by the General Counsel or by other companies in the conglomerate requesting for assistance, provided it is a legal and not a commercial issue and provided further that the same is within the scope of its authority and expertise.

GCG-Compliance shall regularly apprise the General Counsel, companies in the conglomerate, or requestors of the status of the referrals or request for assistance received until the same is resolved and considered closed or completed. It shall endeavour to resolve referrals to the best of their ability and within the agreed deadline.

#### **b. Use of the Legal Referral Portal**

The Legal Referral Portal (LRP) shall be used when there is a compliance referral. The LRP may be accessed through this link: [https://jgsummit.service-now.com/legal?id=sc\\_cat\\_item&sys\\_id=e02a0509dbf0f3007957f2adbf9619c3](https://jgsummit.service-now.com/legal?id=sc_cat_item&sys_id=e02a0509dbf0f3007957f2adbf9619c3).

Handling lawyers shall either request the requestor to submit a referral in the LRP or, in the alternative, initiate the opening of a case therein to ensure proper documentation and record keeping, provided that the referral is not classified as highly confidential and necessitates off-line handling.

The General Counsel and Compliance Head (CH) or CCO (if the function or title does not reside in one person) shall have the discretion to determine whether a referral should be entered in the system considering all relevant factors (e.g., replying to minor queries, participation in the referral is minor or only involves coordinating with other groups, current referral is only a part of a bigger referral that is already in the LRP, or any other consideration). After the resolution or completion of the referral, the handling lawyer shall close the same in the LRP subject to the approval of the CH/CCO.

#### **c. Use of the Teams Calendar**

The Teams Calendar (Calendar) shall be used when there is a referral. Access to the Calendar shall be granted to GCG-Compliance only and shall be restricted to ensure confidentiality. Members of GCG-Compliance shall use the Calendar to track the tasks assigned for its special projects and for record-keeping of files. They shall regularly update the status of the Tasks or Special Project in the Calendar to ensure accurate reporting of its monthly activities. Using the Calendar, the Compliance Officer shall provide the CCO of the consolidated accomplishment report of GCG-Compliance every month.



## C. COMPLIANCE REVIEW

Testing and monitoring are an indispensable part of an effective compliance program. These ensure that laws, rules, regulations, and policies are consistently complied with across all business units of JGS and that its compliance level is adequately monitored and reported to the appropriate levels of management and the Board.

The program shall include a guide on the areas of review for the compliance function to measure effectiveness. In collaboration with Corporate Internal Audit, GCG-Compliance shall check the adequacy and soundness of governance practices, and compliance with applicable laws and regulations and company policies. The results of the review will be reported to the Board or its assigned Committee and to the governing body which ensures the Company's faithful compliance with all applicable laws and regulations and adherence to recognized best business practices.

GCG-Compliance shall conduct a regular compliance review for CG and other targeted compliance reviews (classified as a Special Project) to detect lapses or non-compliance with laws, rules, regulations, and policies of the Company. These reviews shall enable GCG-Compliance to identify, monitor, and address compliance observations or deviations. In performing a targeted and representative compliance review, the scope of compliance review activities shall be based upon the demands, needs, and requirements of JGS and its subsidiaries.

### 1. Conduct of Compliance Review

Annually, GCG-Compliance shall plan and identify areas in **CG** (e.g., compliance with the duties under the manuals or charters, website, annual reports, etc.) and in **Compliance** (e.g., tax, property, permits, environmental regulation, etc.) where compliance reviews are necessary and appropriate. The determination of areas for review shall consider factors such as risk level, amount of exposure, actual or potential known violations, among others.

GCG-Compliance may conduct a compliance review on its own or through a request or directive from Management or General Counsel. Generally, the review shall be initiated by requesting approval through a Memorandum addressed to the General Counsel and/or the President and CEO (Chief Executive Officer). It may also be initiated without a Memorandum, if the same is directly assigned by Management.

The corporate center unit (CCU) of the Company or other companies in the Conglomerate (BU) requesting (or directed to be the subject of) a compliance review shall formalize the request by creating a referral in the LRP, as necessary, after the required approval Memorandum has been obtained or secured. The LRP may be



accessed through this link: [https://jgsummit.service-now.com/legal?id=sc\\_cat\\_item&sys\\_id=e02a0509dbf0f3007957f2adbf9619c3](https://jgsummit.service-now.com/legal?id=sc_cat_item&sys_id=e02a0509dbf0f3007957f2adbf9619c3).

GCG-Compliance may initiate one or more reviews depending on necessity and considering the availability of personnel and resources to conduct the same.

## **2. Closure of Compliance Review:**

GCG-Compliance shall discuss the observations with the CH/CCO once initial observations are completed, then discuss the observations with the CCU/BU concerned to confirm the correctness of its assumptions and initial report. GCG-Compliance and the CCU/BU shall agree on the relevant issues, observations, and concerns, as well as the reasonable, practicable, and feasible remediation procedures and timeline that will be included in the report to Management.

Once all relevant issues, observations, and concerns have been resolved and completed, GCG-Compliance shall close the compliance review. Any new similar issue, observations, and concerns after the closure shall be treated as a new concern or matter but may be linked to the previous review to facilitate tracking.

## **III. CONTINUING EDUCATION / TRAINING PROGRAM**

### **A. Compliance Training**

A key element to the success of having a compliance culture is the knowledge and awareness of all employees of the laws, regulations, policies, and ethical standards pertaining to their respective role in the Company. If the Company's employees are not adequately trained in compliance matters, mistakes and deviations can happen. Thus, to strengthen awareness among all employees, the compliance training shall be integrated into the various training programs of the Company and its subsidiaries.

GCG-Compliance shall help Management educate all employees on compliance issues and act as a contact point within the company for compliance queries. It shall not only provide education programs for new hires but also ongoing or refresher training for other employees to reinforce their knowledge of laws, regulations and policies as well as make them aware of any updates thereof.

Compliance training methods can be through classroom type training, Webinars, E-Learning Facility of the company, or any other method, which could serve as a training guide for everyone within the company. Examples of these training programs are:



1. **Employees Orientation Program for New Hires** – Training includes JGS history, purpose, core values and ambition; human resources group's policy and employee benefits; business etiquette; Code of Conduct; and Data Privacy, among others.
2. **GCG Learning Series** – training provided by various departments of the General Counsel Group to educate employees regarding the laws, rules and regulations relevant to both their work and personal life.
3. **E-Learning Training through LinkedIn Learning** – repository of training materials that allow employees to independently create and establish their own development program and customize their training needs.

#### IV. RELEVANT AND APPLICABLE LAWS AND REGULATIONS

1. Revised Corporation Code
2. Securities Regulation Code
3. Code of Corporate Governance
4. Environmental Laws (i.e., EISS, Clean Air and Water Acts, Solid Waste Management Act, Hazardous Waste Management Act, or Water Code)
5. Anti-Graft and Corrupt Practices Act

#### V. RELEVANT POLICIES OF THE COMPANY

1. Code of Business Conduct
2. Anti-Bribery and Anti-Corruption
3. Conflict of Interest
4. Insider Trading
5. Material Related Party Transactions
6. Protection of Creditors' Right
7. Related Party Transaction Policy
8. Stakeholders Health Safety and Welfare
9. Whistleblowing Policy