

POLICY

Group	GOKONGWEI GROUP OF COMPANIES	Document No. JG CGMS Bulletin No. 2021-03	Page 1 of 5
Company	JG SUMMIT HOLDINGS, INC. (JGSHI)	Reference (Old Doc.) No. NA	Revision No. 0
Business Unit	CCU	Document / Revision Date 19 November 2020	
Chapter	LEGAL	Effectivity (Approval Date): 10 December 2020	
Section	COMPLIANCE	Approved by:	
Subject	CORPORATE DISCLOSURE POLICY	(Original signed) EXECUTIVE COMMITTEE	

POLICY STATEMENT

The Company is committed to strict compliance of all regulatory obligations. When disclosing information, the Company shall be guided by the principles of accuracy, accessibility, timeliness, completeness, and regularity. The Company shall abide with the provisions of law set forth in the Securities Regulation Code and its Implementing Rules and Regulations and shall implement policies and procedures to maintain a reasonable balance between the transparency of the Company and the protection of its commercial interests.

OBJECTIVES

This policy aims to:

1. Regulate the disclosure of information by the Officers and Employees of the Company about the Company, its subsidiaries and affiliates, including their business activities and results of operations; and
2. Identify the duties of employees and responsible departments in ensuring compliance to the provisions of law and this Policy.

The objective of disclosure is to provide information to stakeholders and interested parties in order to enable such persons to determine whether to buy, sell or hold securities, or in connection with the exercise of related voting rights. It must take reasonable steps to ensure that all current and potential investors have equal access to such information.

SCOPE AND COVERAGE

1. This Policy shall apply to JG Summit Holdings, Inc. ("Company") and all types of information as defined in this Policy;
2. This policy shall cover all Officers and Employees of the Company in charge of disclosure responsibilities related to the following rules and regulations:
 - 2.1. Revised Corporation Code of the Philippines (RA 11232);
 - 2.2. Securities Regulation Code of the Philippines (RA 8799 and its Implementing Rules and Regulations);
 - 2.3. Consolidated Listing and Disclosure Rules of the Philippine Stock Exchange, Supplemental Rules and Guidance Notes;
 - 2.4. Code of Corporate Governance for Publicly-Listed Companies of the Securities and Exchange Commission; and
 - 2.5. Other relevant laws, rules, and regulations.



POLICY

Group	GOKONGWEI GROUP OF COMPANIES	Document No. JG CGMS Bulletin No. 2021-03	Page 2 of 5
Company	JG SUMMIT HOLDINGS, INC. (JGSHI)	Reference (Old Doc.) No. NA	Revision No. 0
Business Unit	CCU	Document / Revision Date 19 November 2020	
Chapter	LEGAL	Effectivity (Approval Date): 10 December 2020	
Section	COMPLIANCE	Approved by: (Original signed) EXECUTIVE COMMITTEE	
Subject	CORPORATE DISCLOSURE POLICY		

GENERAL POLICY

3. The Disclosure Controls shall involve the following:
 - 3.1. Identifying applicable continuous disclosure requirements under securities laws, rules, and policies;
 - 3.2. Identifying the authorized persons responsible for preparing reportable information and individuals, responsible for reviewing reports or portions of reports to verify any disclosure made with respect to their areas of responsibility or expertise; and
 - 3.3. Establishing timetables for the preparation and adequate review of reportable information; establishing procedures for obtaining sign-off on disclosure of reportable information and receipt of approval or consents from the concerned source Department/Proponent whose reports are included or referred to in any disclosure.

1. The Company shall disclose all Material Information affecting the financial and business operations of the Company.
2. The Company's designated Authorized Persons shall be responsible for the following:
 - 2.1. Ensuring organization, accuracy and timeliness of disclosure of the material information.
 - 2.2. Information required to be disclosed in company filings is made known to the Approvers and recorded, processed, summarized, and reported within the required time periods. It shall follow the mandated regulatory and Company's Approval Process prior filing to the SEC and PSE. The Material Information is required to be properly disclosed first to the SEC and PSE before it can be reported to third parties.
 - 2.3. Safekeeping of the Company's documents that are subject to mandatory storage, control access thereto and provide copies thereof. The Corporate Secretary shall certify copies of these documents or information when required by existing laws, policies, rules and regulations.
 - 2.4. Press releases or public statements that may have a significant impact on the Company's business activities and/or the value of its securities shall have prior approval and clearance from the Company's President and CEO and Chairman prior to disclosure to the Exchange.

POLICY

Group	GOKONGWEI GROUP OF COMPANIES	Document No. JG CGMS Bulletin No. 2021-03	Page 3 of 5
Company	JG SUMMIT HOLDINGS, INC. (JGSHI)	Reference (Old Doc.) No. NA	Revision No. 0
Business Unit	CCU	Document / Revision Date 19 November 2020	
Chapter	LEGAL	Effectivity (Approval Date): 10 December 2020	
Section	COMPLIANCE	Approved by:	
Subject	CORPORATE DISCLOSURE POLICY	(Original signed) EXECUTIVE COMMITTEE	

3. The Corporate Secretary and Chief Financial Officer and Compliance Officer shall authorize their Groups in the filing of the corporate disclosures to the SEC and uploading the same in the PSE EDGE. Approval to disclose the said information to the SEC and PSE shall follow the set Decision Authority and shall be secured the most efficient method possible to ensure timeliness of the disclosures.
4. The Handling Teams shall fully inform the Authorized Persons of the Company's business activities and results of operations that might be of interest to the business community for the purposes of:
 - 4.1. determining the materiality and timing of the disclosure of the information;
 - 4.2. ensuring the proper understanding of the current operations of the Company that may be of interest to investors; and
 - 4.3. preventing situations where the Company might inadvertently deny the occurrence of any significant events, despite the fact that they actually occurred;
 - 4.4. ensuring that all other disclosures not falling under the above-mentioned categories to follow the protocols set in this Policy. They shall coordinate with the Corporate Secretary's Office and/or other Authorized Persons in drafting and timely filing of the disclosures as deemed necessary.
5. In case of emergencies or extraordinary circumstances, where none of the Authorized Persons are available to make the disclosure to the public, Authorized Persons may designate other officers or employees of the Company to act on their behalf and respond to any inquiries within their competencies. However, no person other than the Company's duly authorized and appointed Authorized Persons may comment upon or answer any questions, or respond to any inquiries regarding the Company's business activities and results of operations, without special authorization or order of an Authorized Person.
6. If any Officer or Employee of the Company participates in any public activity, as part of his or her official or other duties, such Officer or Employee shall ensure that any disclosure of information regarding the Company is made in strict compliance with this Policy.
7. The Company shall provide the documents containing Material information when requested by those governmental and law enforcement authorities entitled to have access to such information pursuant to applicable laws of the Philippines, as well as

POLICY

Group	GOKONGWEI GROUP OF COMPANIES	Document No. JG CGMS Bulletin No. 2021-03	Page 4 of 5
Company	JG SUMMIT HOLDINGS, INC. (JGSHI)	Reference (Old Doc.) No. NA	Revision No. 0
Business Unit	CCU	Document / Revision Date 19 November 2020	
Chapter	LEGAL	Effectivity (Approval Date): 10 December 2020	
Section	COMPLIANCE	Approved by: (Original signed) EXECUTIVE COMMITTEE	
Subject	CORPORATE DISCLOSURE POLICY		

when requested by employees of the Company following existing policies on disclosure. This shall follow the existing Company's related Decision Authority Matrix.

8. In addition to the means of disclosure required by law, the Company shall:
 - 8.1. Through the Corporate Affairs and Sustainability Group:
 - 8.1.1. publish information about the Company in the mass media or issue press-releases when in the opinion of the Authorized Person, the information or the situation requires such publication; and
 - 8.1.2. update the Company's website regularly to ensure that the latest press releases, news, results of operations or briefings are uploaded in the website
 - 8.2. Through the Investor Relations Team, conduct regular meetings with shareholders, potential investors and other market participants; and
 - 8.3. Conduct any other means of disclosure as established by the Board of Company.
9. All structured, unstructured and corporate governance reports submitted to the SEC and PSE must be uploaded to the Company's website by the Corporate Affairs and Sustainability Group:
 - 9.1. The Company must only upload the disclosures submitted to the PSE on the websites upon receipt of the approval email from the Exchange or upon posting of the disclosures in the PSE EDGE website.
 - 9.2. Only the employees delegated by the Authorized Persons shall request the uploading of filed documents with SEC and PSE to the Disclosure section of the Company's website. They shall also be responsible in checking the completeness and accessibility of disclosures uploaded to the website of the company.
10. The Company shall take all necessary steps and actions to protect its Confidential Information. Only the following have access to Confidential Information:
 - 10.1. The Board Members;
 - 10.2. Authorized Persons;
 - 10.3. Other officers of the Company other than the Authorized Persons; and
 - 10.4. Any officers as may be authorized by the foregoing persons.



POLICY

Group	GOKONGWEI GROUP OF COMPANIES	Document No. JG CGMS Bulletin No. 2021-03	Page 5 of 5
Company	JG SUMMIT HOLDINGS, INC. (JGSHI)	Reference (Old Doc.) No. NA	Revision No. 0
Business Unit	CCU	Document / Revision Date 19 November 2020	
Chapter	LEGAL	Effectivity (Approval Date): 10 December 2020	
Section	COMPLIANCE	Approved by: (Original signed) EXECUTIVE COMMITTEE	
Subject	CORPORATE DISCLOSURE POLICY		

The possessor of such information shall be responsible for taking steps to protect its confidentiality.

11. All the Officers and Employees who shall possess such information shall:
 - 11.1. be required to sign Confidentiality Agreements as deemed necessary; and
 - 11.2. not disclose such information to third parties for business purposes nor use such information for entering into any business transactions.
12. Employees of the Company who have illegally obtained such information and who have disclosed the same in violation of their employment contracts, and to any other contracting parties disclosing such information in violation of their contractual agreement shall be subject to Offenses Subject to Disciplinary Action (OSDA).
13. Employees should not discuss internal Company matters or developments with anyone outside the Company, except as required in the performance of their regular employment duties, nor should Company matters be discussed in public or quasi-public areas where conversations may be overheard.
14. Inquiries about the Company, which may be made by the financial press, investment analysts or others in the financial community should be directed or referred to the designated individuals authorized by the Company.
15. Confidentiality of non-public information should be strictly observed.
16. The Company President and CEO, Compliance Officer and Corporate Secretary of the Company shall be responsible for ensuring compliance with applicable laws and any special requirements provided for in the Company's Articles of Incorporation and By-Laws, policies and other internal documents to prevent conflicts of interest the improper use of Material Non-Public Information by the employees and business units of the Company.
17. The Company shall ensure that shareholders have access to the documents and information as set forth in the Company's Corporate Governance Manual.
18. All shareholders shall have the right to review documents bearing Public Information at the official principal address of the Company. The Company shall provide copies of any such documents upon the request of any shareholder.

POLICY

Group	GOKONGWEI GROUP OF COMPANIES	Document No. JG CGMS Bulletin No. 2021-03	Page 6 of 5
Company	JG SUMMIT HOLDINGS, INC. (JGSHI)	Reference (Old Doc.) No. NA	Revision No. 0
Business Unit	CCU	Document / Revision Date 19 November 2020	
Chapter	LEGAL	Effectivity (Approval Date): 10 December 2020	
Section	COMPLIANCE	Approved by: (Original signed) EXECUTIVE COMMITTEE	
Subject	CORPORATE DISCLOSURE POLICY		

19. Requests to review or receive copies of documents shall be made in writing to the attention of the Corporate Secretary and be sent to the official Company's business address. The request shall state the full name of the shareholder (for legal entities, their names and location), the number and category (class) of shares owned by the shareholder and the title of the document requested. The request is to be accompanied by an extract from the share register as issued by the Company's stock transfer agent.
20. The Corporate Secretary of the Company shall be required to verify the share ownership of the person requesting information.
21. The documents shall be made available for inspection free of charge within ten (10) business days after the date of request.
22. Copies of the documents shall be made available within ten (10) business days after the relevant request and after receipt of payment from the shareholder for the copy and postage costs incurred by the Company. If copies of the documents are sent to the requesting party by mail, the date of dispatch shall be considered the date of providing the documents.

-o0o-