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Subject	<b>AMENDED CONFLICT OF INTEREST POLICY</b>		

## POLICY STATEMENT


JG Summit Holdings, Inc. (“JGSHI” or the “Company”), is committed to upholding the core values of possessing an entrepreneurial mindset, stewardship, and acting with honor and integrity in all the undertakings. Accordingly, it is the duty of the Company to protect the interests of all stakeholders and ensure that procedures are in place to guide its directors, employees, on-the-job trainees, consultants and agents or representatives, (“Covered Persons”), in handling transactions where actual, potential, or perceived conflicts of interest may arise.

Also, consistent with the Company’s avowed governance principles and values of accountability, integrity, fairness and transparency, all Covered Persons are committed to ensure compliance with all applicable laws, rules, regulations and company policies, systems, practice, orders and similar official corporate issuances. In this regard, all Covered Persons shall ensure that all work-related decisions, actions, or inactions are above-board and based on sound business principles and judgment and devoid of bias or partiality.

## OBJECTIVES

This Policy aims to:

1. Strengthen the stakeholders’ confidence in the good governance of the Company by promoting the core value of integrity and reinforcing its Code of Business Conduct and Ethics, Anti-Bribery and Anti-Corruption policies and programs, Whistleblowing Policy, and other applicable Corporate Governance policies.
2. Ensure that business decisions always reflect independent judgment and discretion, and are based on the best interests of the Company.
3. Ensure that actual or potential conflicts of interest are handled and prevented by providing clear guidelines to all Covered Persons.
4. Ensure Immediate Heads and CCU Heads are aware of the activities of employees or representatives of the Company under their control and supervision in line with the Code of Business Conduct and Ethics.
5. Ensure all Covered Persons are aware that they should disclose to the Immediate Heads, CCU Heads or IECON Secretariat existing or potential conflicts of interests that they are or may become aware of.

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## SCOPE AND COVERAGE

This Policy covers and applies to:

1. All JGSHI directors and employees (“Directors and Employees”).
2. All consultants (new and current), on-the-job trainees, agents or representatives of the Company, and other similar roles (“Engaged Personnel”).
3. As appropriate, subcontractors and other external collaborators shall also comply unless their institution/company provides adequate assurance that they are in compliance with this Policy.
4. All conflicts of interest are defined herein and shall be read in conjunction with JGSHI’s Code of Business Conduct and Ethics, Anti-Bribery and Anti-Corruption Policy, Whistleblowing Policy, among other Corporate Governance policies.
5. Disclosure, review, resolution, applicable sanctions for the violation of this Policy and the exercise of necessary oversight of conflicts of interest.


## DEFINITION OF TERMS

1. **Affiliate** – refers to any person, entity, organization, business or venture with whom/which an Employee has an affiliation, personal relationship or financial involvement. These include, among others:
  - 1.1. Relatives (as hereunder defined);
  - 1.2. Associates (as hereunder defined);
  - 1.3. Corporations or firms where a Covered Person and/or his Relative holds a position as director, officer or executive of such corporations or firms;
  - 1.4. Corporations or firms where a Covered Person and/or his Relative either singly or collectively, holds/owns more than ten percent (10%) of the subscribed capital or equity of such corporations or firms;
  - 1.5. Corporations or firms wholly or majority owned or controlled by the corporation or firm where a Covered Person and/or his Relative either singly or collectively, holds/owns more than ten percent (10%) of the subscribed capital or equity of such corporations or firms;
  - 1.6. Partnerships of which a Covered Person or his Affiliate is a general partner;
  - 1.7. A co-ownership in which a Covered Person or his Affiliate is one of the co-owners of a property sold, assigned, or leased to JGSHI or any of its subsidiaries except where the sale, assignment and/or lease covers only the other co-


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owner's (who is not the Covered Person or his Affiliate) undivided interest in the property.

2. **Agents or Representatives** – refer to persons who act on behalf of, or who are authorized to perform acts or participate in transactions of the Company, its subsidiaries and affiliates.
3. **Associates** – refer to third parties with existing or previous close personal or business affiliation or relationship with a Covered Person in view of which said Covered Person's decisions or actions in the best interest of JGSHI or its subsidiaries is unduly affected or compromised.
4. **Corporate Center Unit (CCU) Head** – the manager who is the highest in rank in a CCU or group (next in line to the President and CEO) of the Company, who is responsible for overseeing and coordinating the activities of the CCU or group within the organization.
5. **Consultants** – refer to and include professional consultants, firms, partnerships, counsels, or such other professional entities or individuals rendering professional or specialized expert services to JGSHI and/or any of its subsidiaries, as well as advisors of the Company who may be appointed by the Board of Directors or the Company President and CEO, or who act as representatives of the Company's investors, shareholders, affiliates or partners.
6. **Corporate Human Resources Group (CHR)** – refer to CCU Human Resources teams of the Company that is responsible for recruiting, hiring, and training job applicants as well as handling employee terminations, and compensation and benefits, among others.
7. **Conflict of Interest (COI)** – exists if in the course of employment, a person's judgment and discretion could be influenced or is influenced by considerations of personal gain or benefit or interferes or appears to interfere in any way with the interests of the Company as a whole. It occurs when an individual is in a situation that may allow them to exploit their position for personal gain or benefit or they take actions or has interests that make or appear to make it difficult to perform his or her Company work objectively and effectively. COI can also arise when an Employee and/or his Affiliate receives or will receive improper Personal Benefit from a transaction with JGSHI and/or its subsidiaries as a result of an Employee's position in JGSHI and/or any of its subsidiaries.


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8. **Director** – refers to member of Board of Directors who is the governing body elected by the Shareholders that exercises the corporate powers of a corporation, conducts all its business and controls its properties.
9. **Employee** – refers to any individual hired by JGSHI for salaries and/or benefits provided in regular amounts at stated intervals in exchange for services rendered personally for the Company’s business on a regular basis and who does not provide such services as part of an independent business. This includes JGSHI’s officers, supervisors, rank and file, whether regular or probationary, as well as Fixed Term Employees.
10. **Fixed-Term Employee (FTE)** - refers to an Employee who retires at 60 years old and his/her employment services are re-contracted by the Company on a pre-determined period of time.
11. **Integrity and Ethics Council (IECON)** – refers to the group composed of Heads of CHR, Corporate Internal Audit (CIA) and the General Counsel Group (GCG), designated by the Company to handle any COI matter.
12. **IECON Secretariat** – refers to the group designated to assist the IECON in administrative, reportorial, and other functions.
13. **Immediate Head** - the manager in the Company to whom an Employee directly reports and who exercises control over the work performance of the latter.
14. **Manual Self-Disclosure Form (MSDF)** – refers to the document manually filled out by a Covered Person as an alternative to the Online Self-Disclosure Form (OSDF) to declare any actual or potential COI by answering guide questions therein and providing other relevant information.
15. **Mandatory Annual Self-Disclosure Activity** – the once-a-year campaign led by General Counsel Group – Compliance requiring all Directors and Employees to submit an SDF within thirty (30) working days after the end of the calendar year or from the date of the email notification from IECON Secretariat.
16. **On-Demand Self-Disclosure or Self Disclosure as Deemed Necessary** - Self-disclosures of conflict of interest that are not covered by the Mandatory Annual Self-Disclosure Activity, or those that are on-demand or to be submitted as the need arises, i.e. disclosures of newly-hired Employees, new Consultants and Agents or Representatives

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of the Company, or each time that a Covered Person would like to disclose new information to avoid potential and actual conflict of interest, or as deemed necessary by the Chairman, President and CEO, CCU Head, and/or other authorized Company representative, such as the Immediate/CCU Head, CHR, and IECON. Covered Persons may submit an On-Demand Self-Disclosure Form through the OSDF (as hereunder defined) or MSDF, as necessary.


17. **Online Self-Disclosure Form (OSDF)** – refers to the online form of disclosing of actual or potential COI. The digital and paperless disclosure form is intended to help reduce paper cost and saves time related to data administration, and information retrieval and maintenance. This online form can be accessed by all Company Employees who are required to declare any actual or potential COI.
18. **Personal Benefit** – refers to gain or advantage, whether material or non-material, directly or indirectly provided to or received by a Covered Person and/or his Affiliate, such as financial gain, professional advancement, travel, facilities and/or accommodation, benefits, entertainment, preferential treatment in personal transaction, and other similar advantages.
19. **Project** – refers to the Company’s capital expenditure (CAPEX) undertakings that are composed of fixed assets procured per project timetable. These projects are generally revenue generating (e.g. acquisitions of investment property and property, plant and equipment during the period, including those acquired through business combination).
20. **Relatives** – relatives of up to the third degree, by consanguinity, affinity or legal adoption, including spouse, parents, children (and their spouses), siblings (and their spouses), nieces and nephews (limited to children of brother and sisters) (and their spouses), grandparents, and aunts and uncles (limited to sisters or brothers or parents); and a domestic partner and his relatives of up to third degree, by consanguinity, affinity or legal adoption.
21. **Self-Disclosure Form (SDF)** – refers to either the MSDF or OSDF, which may be filed annually or on-demand/as deemed necessary.
22. **Stakeholders** – in this Policy refer to shareholders, directors, officers, employees, consultants, agents, representatives, business partners, and customers of the Company, its subsidiaries and affiliates.

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## GENERAL POLICY

23. **Subsidiary** – refers to a Company where the Parent Company is the legal or beneficial owner of more than fifty percent (50%) of the issued and outstanding capital stock of the subsidiary company.
  24. **On-the-Job Trainee** - refers to an individual who is undergoing training in a practical work environment to acquire specific skills or knowledge related to a job or profession. The training typically involves a combination of instruction and hands-on experience under the supervision of experienced employees or trainers.
  25. **Third Party** – refers to an individual, entity, organization and/or its representatives that has existing and/or intended business dealings with the Company. This includes prospective or existing suppliers, contractors, buyers, dealers and customers.
1. As a policy, transactions which are or may have potential of being deemed as COI transactions are prohibited. The business decisions of all Covered Persons must be based on the best interest of the Company and its subsidiaries and affiliates and must not be motivated by personal considerations and other relationships that can interfere with their independent and objective judgment.
  2. All Covered Persons have an obligation and are expected to act in the best interests of the Company.
  3. All Covered Persons are enjoined from giving undue preferential treatment to any individual or entity with whom the Company and/or any of its subsidiaries does business.  
Further, they shall avoid:
    - 3.1. situations where personal interest conflicts with the interests of the Company;
    - 3.2. circumstances that could, or could be reasonably expected to, impair their objectivity in the performance of their duties and obligations to JGSHI, and/or any of its subsidiaries; and
    - 3.3. competing with the Company, nor shall he or she allow business dealings on behalf of the Company to be influenced, or even appear to be influenced, by personal or family interests.

In this regard, all Covered Persons are prohibited from participating in any part of the transactions, dealings or decision-making process with respect to any existing or


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**Areas in which  
Conflict of Interest  
May Arise**

potential supplier, contractor, or business partner of the Company in which they or their Affiliate have an interest, including any acts that may be deemed as seeking to influence any action or inaction with respect to such parties.


4. All Employees that recommend, endorse, or approve the procurement or sale of goods and services shall make a conscious effort to avoid any COI situation in transactions that they are involved in.
  - 4.1. Authorized Employees shall select and deal with suppliers, contractors, business partners, consultants and third parties doing or seeking to do business with JSGHI and/or any of its subsidiaries in an impartial manner. In this connection, authorized Employees shall award and maintain contracts or transactions on arm's length commercial terms, based only on the best interest of JGSHI and/or any of its subsidiaries and under strict rules of fairness and confidentiality. The foregoing standards shall also be observed with respect to contracts and transactions between companies within the conglomerate.
5. The areas enumerated are descriptive only and not exhaustive. Other areas not described herein shall be evaluated on a case-to-case basis within the standards and parameters set forth in the Code of Business Conduct and Ethics, and other applicable Corporate Governance policies.
  - 5.1. Gifts and Entertainment;
  - 5.2. Bribes;
  - 5.3. Personal Use of Suppliers, Contractors and Professional Service Providers;
  - 5.4. Financial Interest in Third Parties;
  - 5.5. Loans;
  - 5.6. Outside Business Activities;
  - 5.7. Competition with the Company;
  - 5.8. Confidential Information;
  - 5.9. Preservation and Protection of JG Summit's Resources; and
  - 5.10. Solicitations for Company Sponsored Employee-Related Activities
6. COI can also arise in a wide range of human resources matters, such as recruitment, selection and placement, promotion, disciplinary procedures, staff development, performance review, benefits and remuneration. In this area, Employees shall ensure that they treat each other, as well as prospective employees, with respect, fairness,



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<b>Orientation</b>	impartiality, and equal opportunity, including respect for varying views and individual ideas, regardless of rank, seniority or relationship. Employees shall avoid any action or inaction that gives undue preferential treatment or discriminates against any employee or prospective employee.
	7. All new Employees shall undergo orientation of the Code of Business Conduct and Ethics, Anti-Bribery and Anti-Corruption, Whistleblowing, Conflict of Interest, among other Corporate Governance policies upon their employment as part of the Employee-orientation program. All current Employees shall undergo a refresher course on the said policies, as necessary.
<b>Disclosure as Key Mechanism</b>	8. Many potential COI transactions do not constitute actual conflicts or may be acceptable with proper oversight and safeguards. Proper disclosure is the key mechanism to bring potential COI to light for further evaluation, and for oversight, when necessary.
	9. Covered Persons shall promptly disclose any potential relationships, actions or transactions (including those involving relatives) that reasonably could be expected to give rise to a COI to the Company to ensure that potential COI are surfaced and brought to the attention of management. They are required to accomplish the SDF or via other reporting channels deemed necessary.
<b>Mandatory Annual Self-Disclosure Activity</b>	10. All current Employees are required to annually accomplish the OSDF within thirty (30) working days after the end of the calendar year or from the date of the email notification from IECON Secretariat and submit the same to the Receiving/Initial Approving Authority listed in Item 12 of this Policy.
	11. Directors shall accomplish annually the MSDF for Directors within thirty (30) working days after the date of the email notification from the Corporate Secretary, unless already disclosed elsewhere, and submit the same to the IECON Secretariat through the Corporate Secretary.
	12. For the purpose of the Mandatory Annual SDF, the following shall receive and act on the submissions of the following individuals:



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**On-Demand Self-Disclosure or Self-Disclosure as Deemed Necessary**


Covered Person	Receiving/Initial Approving Authority
For Directors	IECON Secretariat through the Corporate Secretary <i>(for endorsement to Chairman)</i>
For CCU Heads and their Immediate Direct Reports	IECON Secretariat <i>(for endorsement to IECON)</i>
For Employees (excluding CCU Heads and their Immediate Direct Reports)	Immediate Heads

13. For disclosures that are not covered by the Mandatory Annual Self-Disclosure Activity, or those that are on-demand or to be filed as necessary, the following shall receive and act on the submitted SDF of the following individuals:

Covered Person	Receiving/Initial Approving Authority
For Directors	IECON Secretariat through the Corporate Secretary <i>(for endorsement to Chairman)</i>
For Employees	Immediate Head
Newly-hired Employees	CHR and/or Immediate Head
Engaged Personnel: New or current Consultants, On-the-Job Trainees, Agents or representatives of the Company, and other similar roles	The CCU Head of the respective CCU or group for which the Engaged Personnel renders professional service

In all cases, the IECON Secretariat may likewise receive the SDF of Covered Persons, submitted to them, and endorse the same to the appropriate Approving Authority.

14. All Covered Persons may submit a new On-Demand SDF at any time that they would like to disclose new information to avoid potential and actual COI.
15. Newly-hired Employees, shall accomplish an MSDF upon their employment, which forms part of their pre-onboarding requirements and submit the same to CHR, who shall forward the accomplished MSDF to the concerned Immediate Head, if with noted COI for the latter's review and disposition.

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**Procedure for  
Disposition of Conflict  
of Interest**

16. Engaged Personnel shall submit an MSDF to their CCU Head prior to their engagement.
17. As deemed necessary by the Chairman, President and CEO, and/or other authorized Company representatives, team members, Employees involved in a project, or Engaged Personnel may be required to make disclosures concerning actual or potential COI by submitting an SDF.

18. For the Mandatory Annual Self-Disclosure Activity, if the Initial Approving Authority rejects or denies the submitted SDF due to an actual or potential COI, the SDF will be escalated to the IECON Secretariat, who shall endorse the same to the Decision-Making Authority for resolution.

For On-Demand Self-Disclosures, the Initial Approving Authority shall forward rejected or denied disclosures with potential or actual conflicts submitted to them, to the IECON Secretariat, who shall then forward the same to the following Decision-Making Authority for final decision. Similarly, disclosures submitted directly to the IECON Secretariat, including those submitted by the Board, will be endorsed by the Secretariat to the applicable Decision-Making Authority for final resolution:

Covered Person	Decision-Making Authority
For Directors	Board of Directors through its Chairman
For Employees and Engaged Personnel	IECON

If, however, the Initial Approving Authority approves the submitted SDF despite it having a potential or actual COI, the former shall provide a reason thereto and furnish a copy to the IECON Secretariat.

19. Covered Persons who submitted an SDF (annual or on-demand) whose submissions were denied by the Initial Approving Authority for having actual or potential COI must secure approval from the applicable Decision-Making Authority listed in Item 18 of this Policy, before they may participate in the transaction where they find themselves in an actual or potential COI.



JG SUMMIT  
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### IECON Recommendations


20. Concerned Covered Persons must inhibit themselves from any direct or indirect participation or involvement at any stage of the transaction pending approval.
21. Concerned Covered Persons must cooperate with the Immediate or CCU Heads, CHR, IECON Secretariat and/or IECON, or other authorized bodies, by providing information and documents when requested.
22. IECON recommendation on COI situations may be, but not limited to the following:
  - 22.1. Allow the activity to go forward without modification;
  - 22.2. Require some specific type of administrative oversight or management;
  - 22.3. Ensure withdrawal or reduction of involvement of the concerned from the activity;
  - 22.4. Require divestiture of relevant personal interest;
  - 22.5. Suspend the project or activity;
  - 22.6. Endorse the concerned Employee to proper law authorities; or
  - 22.7. Other courses of action as deemed necessary.

### Appeal


23. The remedy of appeal is available to Employees whose submitted disclosures were denied by the Decision-Making Authority.
24. Any appeal by an Employee shall be directed to the IECON who shall review and decide on the appeal. The IECON shall exercise discretion on appealed cases that will be endorsed or recommended to the President and CEO for final resolution. An appeal can only be made once, within fifteen (15) working days from receipt of notice from the IECON.

### Confidentiality of Disclosures

25. All records or information that are provided in the Employee's SDF are confidential information.
26. Any information disclosed as required herein shall be used solely for administering this Policy and may not be used for any other purpose.
27. Unauthorized use of disclosed information aside from administering this Policy shall be deemed unethical and shall be sanctioned following the Employee Handbook (i.e., OSDA).

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<b>Non-Submission of SDF</b>	<p>28. Employees who do not submit their SDF as per Policy shall be sanctioned following the provisions of the Employee Handbook.</p> <p>29. Failure or intentional non-disclosure of information (i.e., it is discovered that Employee is involved in a COI situation) as required in this Policy and Code of Business Conduct and Ethics shall be sanctioned following the provisions of the Employee Handbook.</p>
<b>Conflict Resolution</b>	<p>30. In cases when a COI is deliberately concealed or when a solution cannot be found, disciplinary action may be invoked, including termination.</p> <p>31. Members of IECON, IECON Secretariat and other concerned group/s who are involved in handling the COI disclosure/report and have a personal interest due to inter-departmental relationships, such as collaboration with the Employee whose case is under consideration or have fiscal interest, shall inhibit themselves from discussion of a particular case.</p>
<b>Inquiries/Guidance</b>	For inquiries or guidance regarding this Policy, or for assistance in determining whether a COI exists in any particular situation, concerned covered person is encouraged to approach or email the <b>IECON or IECON Secretariat</b> at <a href="mailto:iecon@jgsummit.com.ph">iecon@jgsummit.com.ph</a> .
<b>SBU/BU's Reference</b>	This Policy may serve as a guide and reference for other SBUs/BUs, who have the discretion to adopt this as is or develop their own version, subject to approval by their authorized signatories.

 <div style="display: inline-block; vertical-align: middle;"> <b>POLICY</b> </div>			
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Company	JG SUMMIT HOLDINGS, INC. (JGSHI)	Reference (Old Doc.) No. JG CMS Bulletin No. 2023-01	Revision No. 2
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Chapter	CORPORATE GOVERNANCE	Effectivity (Approval Date) 13 November 2024	
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Subject	<b>AMENDED CONFLICT OF INTEREST POLICY</b>		

#### APPENDICES

APP. 01 – Responsibilities

APP. 02.1 – Mandatory Annual Online Self-Disclosure Activity for Employees Process

APP. 02.2 – Self-Disclosure (On-Demand or Deemed Necessary) Process

APP. 03.1 – Manual Self-Disclosure of Conflict of Interest Form for Employees and Engaged Personnel (On-Demand or Annual)


APP. 03.2 – Manual Self-Disclosure of Conflict of Interest Form for Directors (On-Demand or Annual)

The appendices attached hereto form integral parts of and are deemed approved with this Policy.

#### EFFECTIVITY

These Guidelines shall take effect immediately after approval date and shall continue to be in full force unless superseded by new policies and guidelines.

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 <div style="display: inline-block; vertical-align: middle;"> <b>POLICY</b> </div>			
Group	GOKONGWEI GROUP OF COMPANIES	Document No. APP.01	Page 1 of 5
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### 1. The Corporate Human Resources (CHR) shall:

- 1.1. Ensure that all new employees, upon their employment and as part of their employee-orientation program, undergo training on the following policies: Code of Business Conduct and Ethics, Anti-Bribery and Anti-Corruption, Whistleblowing, Conflict of Interest, and other Corporate Governance policies;
- 1.2. Require newly-hired employees, including FTEs, to submit an MSDF prior to their employment;
- 1.3. Assist IECON Secretariat in the Annual Online SDF (OSDF) of employees, as necessary;
- 1.4. Review all MSDFs submitted by the newly-hired employees and evaluate replies, as necessary;
- 1.5. Endorse to the concerned Immediate Head the submitted MSDF of employees, if with noted COI;
- 1.6. Assist the IECON Secretariat in investigating COI matters as necessary;
- 1.7. Safekeep, file in the 201 files of employees and keep confidential all SDFs directly received and those with noted actual or potential COI endorsed by Immediate Heads, CCU Heads or IECON Secretariat, and the notice of decision from the IECON in case of rejected SDFs or appealed submissions, as necessary;
- 1.8. Discipline or sanction employees that refuse to provide SDFs; and
- 1.9. Require any Covered Person to make a disclosure as deemed necessary.

### 2. The Directors and Employees shall:

- 2.1. Submit an Annual SDF within thirty (30) working days after the end of the calendar year or from the date of the email notification from IECON Secretariat;
- 2.2. Submit an SDF at any time that they would like or deemed necessary to disclose new information to avoid potential COI;
- 2.3. After submitting an SDF, secure approval from the Approving or Decision-Making Authorities in this Policy, before they may participate in the transaction where they find themselves in actual or potential COI;
- 2.4. Inhibit themselves from any direct or indirect participation or involvement at any stage of the transaction pending approval;

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- 2.5. Accomplish an SDF at any time directed by the Chairman, President and CEO, and/or other authorized Company representatives and at any time a new actual or potential COI occurs;
- 2.6. Report in good faith and provide truthful information in the SDF and other documents;
- 2.7. Cooperate with their Immediate Head or CCU Head, CHR, IECON and its Secretariat by providing information and documents when requested; and
- 2.8. Assist their Immediate Head or CCU Head, CHR, IECON and its Secretariat in matters relating to COI, as necessary.


**3. The Engaged Personnel (i.e. Consultants, Agents or Representatives, etc.) shall:**

- 3.1. Accomplish an SDF at any time as directed by the Company Chairman, President and CEO, and/or its authorized representatives; and
- 3.2. Cooperate with the Company by providing information and documents when requested.

**4. The IECON Secretariat, shall:**

- 4.1. Receive, have access to and keep a record of all submitted COI reports and disclosures, including those with noted actual or potential COI endorsed by Immediate Heads, CCU Heads or CHR, and shall keep them confidential;
- 4.2. Prepare a report on the disclosures with noted actual or potential COI and submit said report to IECON;
- 4.3. Receive submitted SDFs of CCU Heads and their immediate direct reports during the Mandatory Annual Self-Disclosure Activity and endorse the same to IECON;
- 4.4. Assess and review COI matters endorsed by CHR, Immediate or CCU Heads, or those received directly from Covered Persons;
- 4.5. Coordinate and collaborate with the relevant groups in collecting necessary information and documents relevant to the COI referrals;
- 4.6. Submit reports to the IECON on relevant COI matters received, and assist the IECON in their review;
- 4.7. Handle questions received, and any other matter assigned by the IECON relating to COI; and



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4.8. Furnish a copy of all SDFs with noted COI to CHR and Immediate or CCU Heads, as applicable, for filing in the concerned employees' 201 files, as necessary; and


4.9. Safekeep and keep confidential all SDFs directly received and those with noted actual or potential COI endorsed by Immediate Heads, CCU Heads or CHR.

#### 5. The IECON shall:

- 5.1. Convene after receipt of an endorsement from IECON Secretariat regarding submitted disclosures with actual or potential COI;
- 5.2. Review relevant SDF information and determine the proper level of management of conflicts;
- 5.3. Ensure that due process is undertaken in reviewing actual or potential COI situations;
- 5.4. Utilize the Company's resources from the various groups and direct the former to provide further information, investigate, or prosecute any COI matter, as necessary;
- 5.5. Adjudicate and recommend the course of action to be taken on all matters relating to COI endorsed by CHR or reports received directly from stakeholders.
  - 5.5.1. Recommendations from the IECON shall be by unanimous vote or agreement of the quorum attending the meeting.
  - 5.5.2. Review and decide on an appeal made by an employee, and exercise discretion on appealed cases that will be endorsed to President and CEO for final resolution.
- 5.6. Notify the concerned Covered Person, the CHR and their Immediate or CCU Heads, as applicable, regarding the final decision on a noted actual or potential COI;
- 5.7. Ensure appropriate reporting of COI to the Company President and CEO, and Governance, Remuneration, Nomination and Sustainability Committee or any other board or management committee, as may be necessary;
- 5.8. Address questions received relating to the COI Policy; and
- 5.9. Require any Covered Person to make a disclosure as deemed necessary.

#### 6. The Immediate Heads shall:

- 6.1. Be the first point of contact to receive, approve or deny submitted SDFs of employees under their control and supervision;

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- 6.2. Furnish CHR and IECON Secretariat a copy of SDFs with actual or potential COI, and escalate the same to IECON Secretariat for IECON's decision if denied;
- 6.3. Notify IECON Secretariat of reason for approving an SDF with potential or actual COI;
- 6.4. Coordinate with CHR, IECON and its Secretariat in matters relating to noted COI of their direct reports, as necessary.
- 6.5. Safekeep and keep confidential all SDFs directly received and those with noted actual or potential COI endorsed by IECON Secretariat or CHR, and the notice of decision from the IECON in case of rejected SDFs or appealed submissions; and
- 6.6. Require any Covered Person to make a disclosure as deemed necessary.

**7. The CCU Heads shall:**

- 7.1. Be the first point of contact to receive, approve or deny submitted SDFs of their direct reports and Engaged Personnel they are dealing with;
- 7.2. Receive and act on the report from IECON Secretariat regarding their direct reports' and Engaged Personnel's SDF with noted actual or potential COI, as the case may be;
- 7.3. Furnish CHR and IECON Secretariat a copy of SDFs with potential or actual COI, and escalate the same to IECON Secretariat for IECON's final decision, if denied;
- 7.4. Notify IECON Secretariat of reason for approving an SDF with potential or actual COI;
- 7.5. Coordinate with CHR, IECON and its Secretariat in matters relating to COI of their direct reports and Engaged Personnel they are dealing with, as necessary.
- 7.6. Safekeep and keep confidential all SDFs directly received and those with noted actual or potential COI endorsed by IECON Secretariat or CHR, and the notice of decision from the IECON in case of rejected SDFs or appealed submissions; and
- 7.7. Require any Covered Person to make a disclosure as deemed necessary.

**8. The Corporate Secretary shall:**

- 8.1. Send an email notification to the Directors for the Annual Self-Disclosure of COI campaign; and
- 8.2. Receive Directors' SDF and forward them to the IECON Secretariat.

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**9. The President and CEO shall:**

- 9.1. Review the recommendations by the IECON in case an employee appeals the IECON's decision denying a submitted disclosure of COI;
- 9.2. Decide on appealed COI cases endorsed by IECON, with finality; and
- 9.3. Require any Covered Person to make a disclosure as deemed necessary

**10. The Chairman of the Board shall:**

- 10.1. Require any Covered Person to make a disclosure as deemed necessary; and
- 10.2. Decide on the course of action to be taken in disclosures with noted COI of Directors.

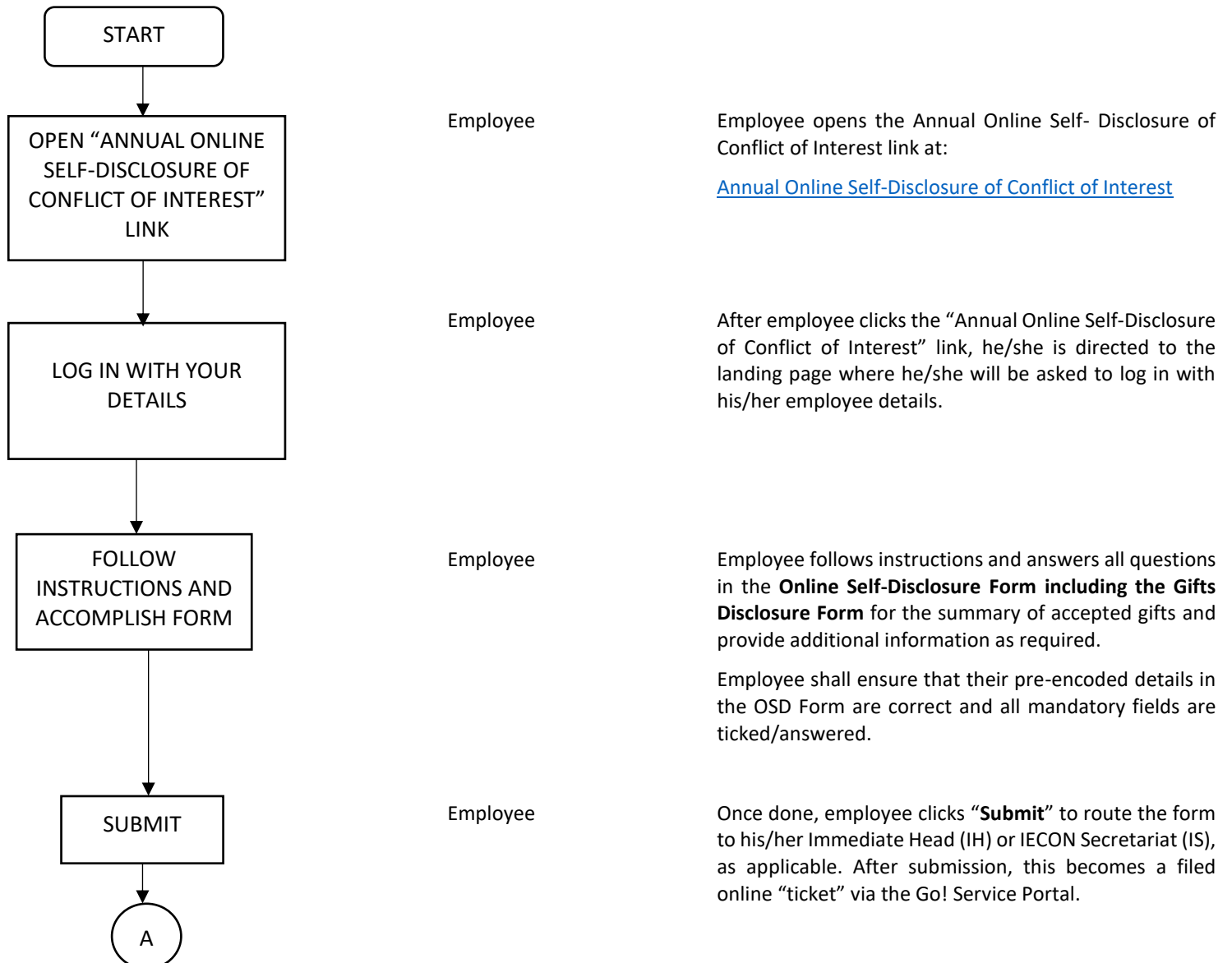
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Section	ANTI-CORRUPTION PROGRAM	Approved by:  (Minutes of Board Meeting) <b>BOARD OF DIRECTORS</b>	
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#### PROCEDURAL FLOW

#### RESPONSIBLE

#### DETAILED ACTIVITIES

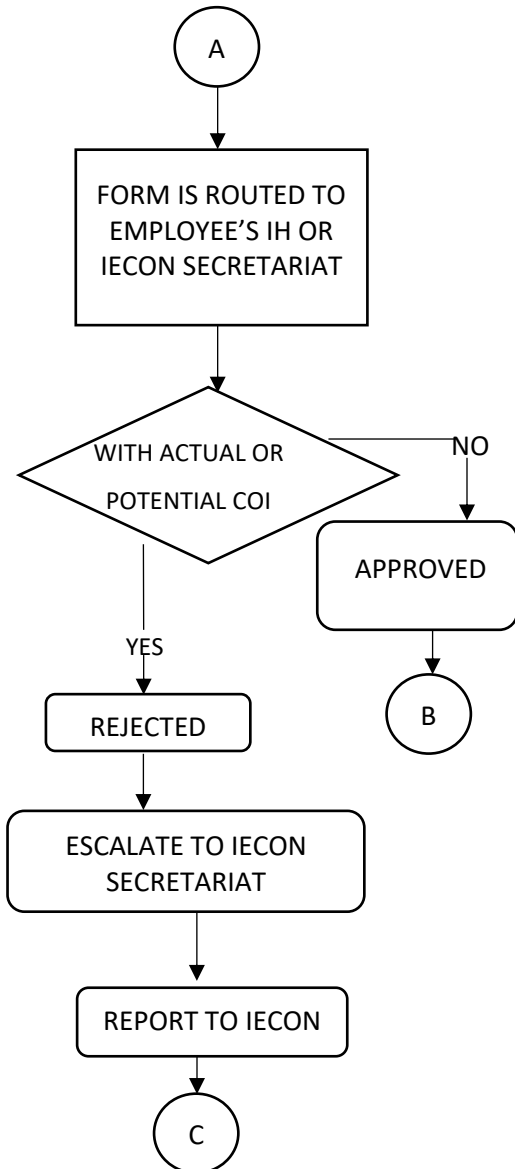


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#### PROCEDURAL FLOW

#### RESPONSIBLE

#### DETAILED ACTIVITIES



Receiving/ Initial Approving Authority in Item 12 of COI Policy

Once employee clicks “Submit”, the form is routed to the employee’s IH or to the IS (for submissions of the CCU Heads and their immediate direct reports under Item 12 of the COI Policy) for appropriate action – within three (3) business days from submission.

Receiving/ Initial Approving Authority in Item 12 of COI Policy

If employee submitted all “No” responses, IH/IS should approve.

If, however, an employee submitted a “Yes” response (with potential COI), IH/IS shall assess and provide a reason in the comment box before clicking “**Approve**” or “**Reject**.”

If an employee submitted all “No” responses or there is no COI, IH/IS is to “**Approve**”.


Tickets of approved OSDFs will be closed.

IECON Secretariat (IS)

If there is an actual or potential COI and IH rejects the form, the OSDF will be escalated to the IS.

IECON Secretariat (IS)

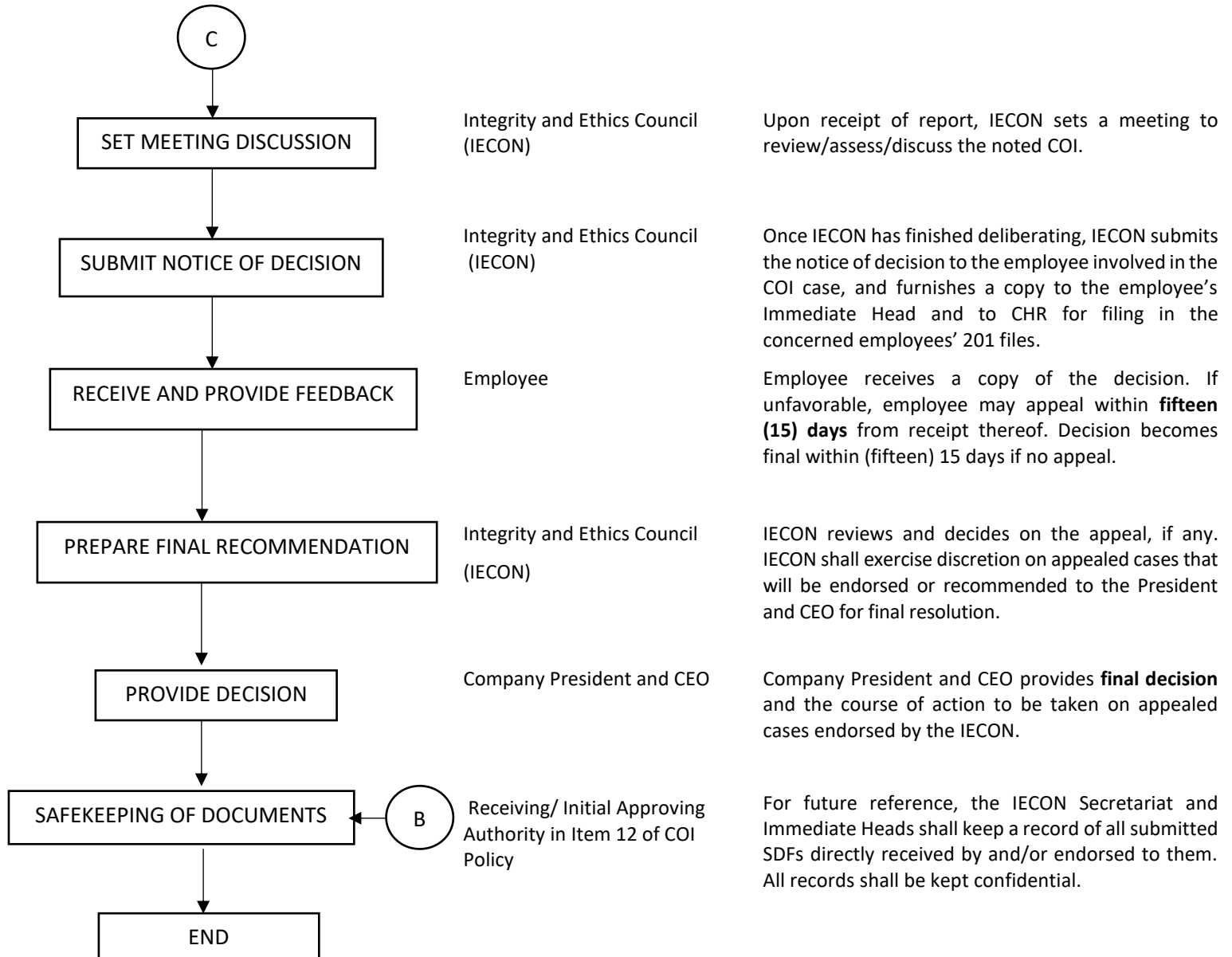
IS prepares a report on the noted actual or potential COI and submits said report to **Integrity and Ethics Council (IECON)**.


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#### PROCEDURAL FLOW

#### RESPONSIBLE

#### DETAILED ACTIVITIES

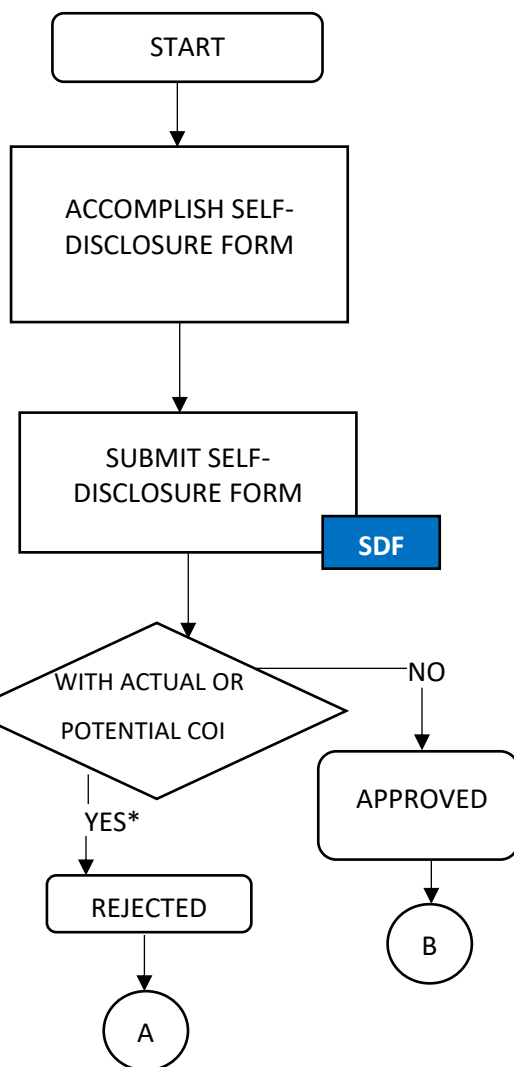


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Group	GOKONGWEI GROUP OF COMPANIES	Document No. APP.02.2	Page 1 of 3
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Subject	<b>AMENDED CONFLICT OF INTEREST POLICY – SELF-DISCLOSURE (ON-DEMAND OR DEEMED NECESSARY) PROCESS</b>		

#### PROCEDURAL FLOW

#### RESPONSIBLE

#### DETAILED ACTIVITIES



Covered Person

Engaged Personnel shall submit an MSDF prior to their onboarding or engagement. A Covered Person who would like to disclose new information to avoid potential COI, or those as deemed necessary by the **Chairman, President and CEO, CCU Head, and/or other authorized Company representatives** shall likewise accomplish an SDF.

Covered Person


The Covered Person submits the SDF to the **Integrity and Ethics Council (IECON) Secretariat, Immediate Head, CCU Head or Corporate Human Resources (CHR)**, as applicable.

Receiving/ Initial Approving Authority in Item 13 of COI Policy

Initial approving authority listed in Item 13 of the COI Policy shall assess before approving or rejecting the SDF.

\* For Directors, the decision on the course of action to be taken in disclosures with noted COI shall be made by: Board of Directors through its Chairman.

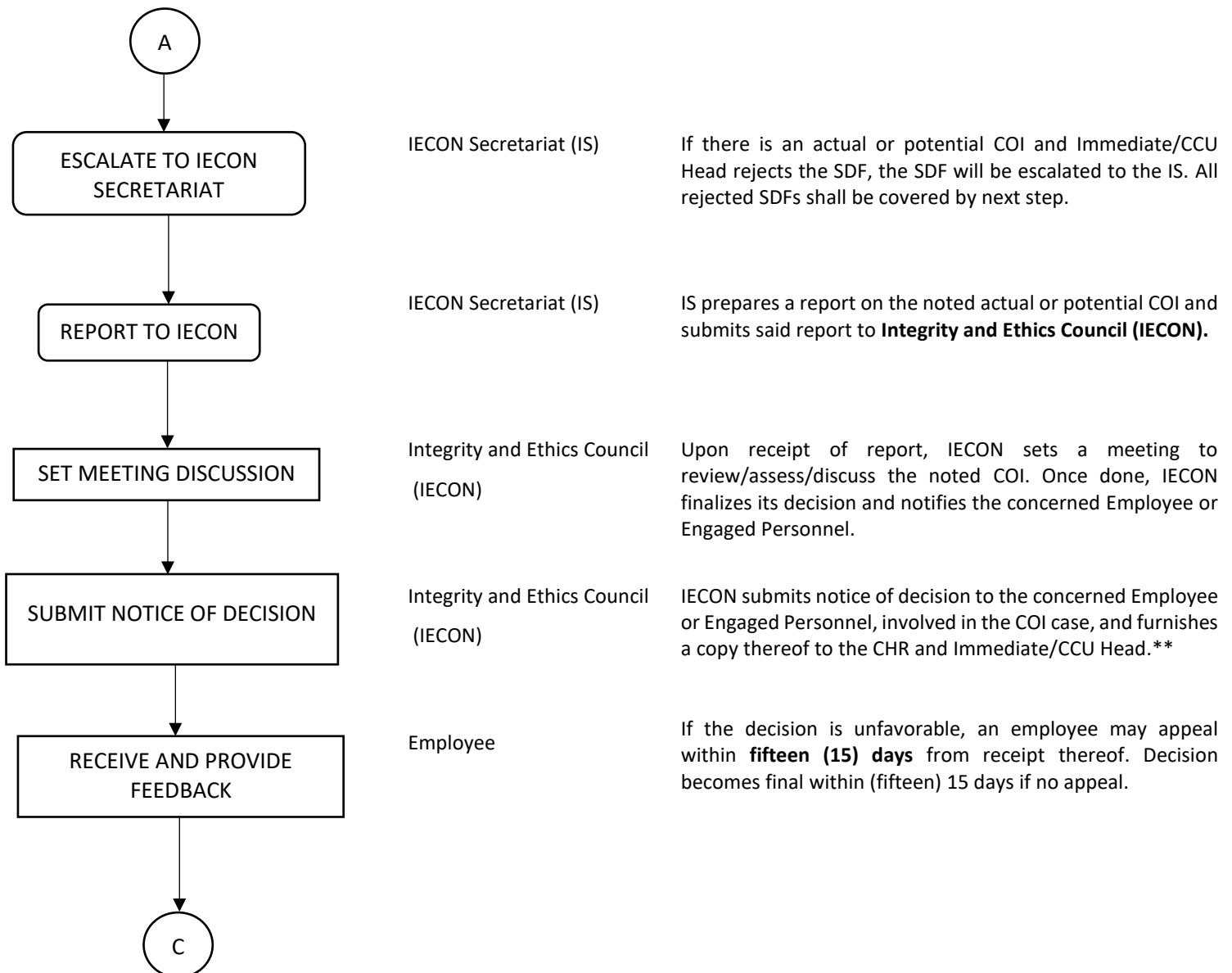



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#### PROCEDURAL FLOW

#### RESPONSIBLE

#### DETAILED ACTIVITIES

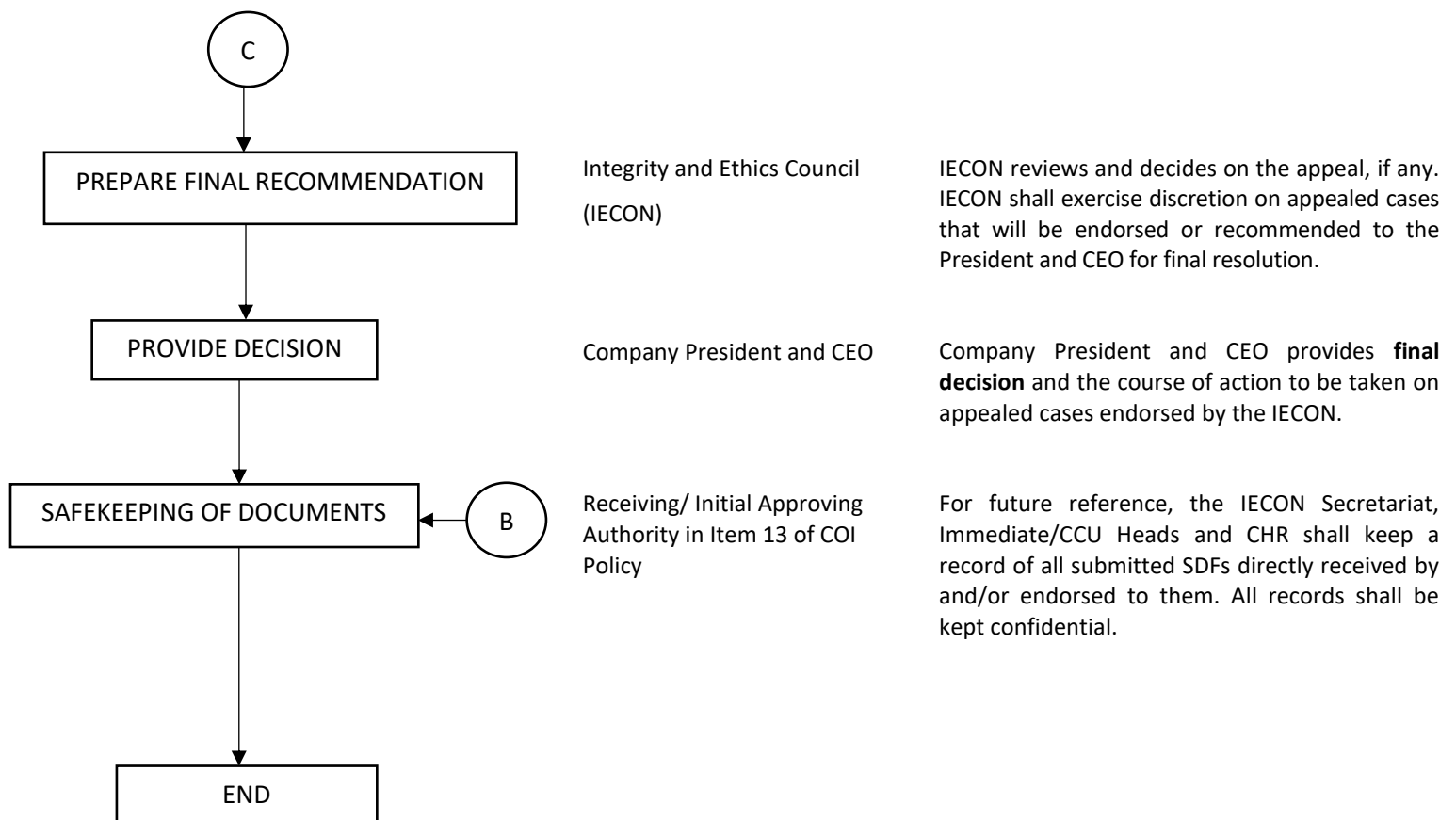


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#### PROCEDURAL FLOW

#### RESPONSIBLE

#### DETAILED ACTIVITIES



\*\*For Engaged Personnel, it is the IECON who ultimately decides on the course of action to be taken in disclosures with noted COI.



JG SUMMIT  
HOLDINGS, INC.

## POLICY

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Chapter	CORPORATE GOVERNANCE	Effectivity (Approval Date) 13 November 2024	
Section	ANTI-CORRUPTION PROGRAM	Approved by:	
Subject	AMENDED CONFLICT OF INTEREST POLICY – MANUAL SELF-DISCLOSURE OF CONFLICT OF INTEREST FORM FOR EMPLOYEES AND ENGAGED PERSONNEL (ON DEMAND OR ANNUAL)	(Minutes of Board Meeting) BOARD OF DIRECTORS	

### MANUAL SELF-DISCLOSURE OF CONFLICT OF INTEREST FORM

Name:  Date Submitted:

INSTRUCTIONS: Read each question carefully. Answer by ticking either "YES" or "NO" in each answer box. If you answered YES to any of the questions, please provide the necessary details on the space provided. If more space is required, use another sheet, duly signed & attached to this form. Italicized terms are defined at the bottom of this Form.

#### II. Dealings/Transactions with a Business Enterprise which is a **Major, Direct or Significant Customer, Supplier or Competitor** of the Company, including its subsidiaries and affiliates ("Subject Enterprise"):

1. Are you or any of your **relatives** a director, officer, owner, partner, employee, agent, consultant, or advisor to any Subject Enterprise?  
☐ Yes ☐ No

If you answered "YES" to the question, please provide the following details **relevant to you, and/or your Relative (if applicable), and to the Subject Enterprise**:

Name of Relative (if applicable): \_\_\_\_\_

Business Name of Subject Enterprise	Employee Details	Relative Details (if applicable)
Position:		
Business Type:		
% of Direct Ownership:		
% of Indirect Ownership:		
Details of participation in any transaction with the Subject Enterprise:		

2. Do you or your **relatives** have a **significant financial interest** in any Subject Enterprise?

☐ Yes ☐ No

If you answered "YES" to the question, please provide the following details **relevant to you, and/or your Relative (if applicable), and to the Subject Enterprise**:

Name of Relative (if applicable): \_\_\_\_\_

Business Name of Subject Enterprise	Employee Details	Relative Details (if applicable)
Position:		
Business Type:		
% of Direct Ownership:		
% of Indirect Ownership:		
Details of participation in any transaction with the Subject Enterprise:		

#### II. Business Dealings/Transactions Similar to the Work Performed in the Company, including its subsidiaries and affiliates

3. Do you or your **relatives** have a **significant financial interest** in any business enterprise ("Subject Enterprise") that engages in any business or activity or provides services identical or in any way similar to the work you are charged to perform for the Company, **including its subsidiaries and affiliates**?

☐ Yes ☐ No

If you answered "YES" to the question, please provide the following details **relevant to you, and/or your Relative (if applicable), and to the Subject Enterprise**:

Name of Relative (if applicable): \_\_\_\_\_

Business Name of Subject Enterprise	Employee Details	Relative Details (if applicable)
Position:		
Business Type:		
% of Direct Ownership:		

% of Indirect Ownership:		
Details of Work Performed Similar to Subject Enterprise:		
Details of participation in any transaction with the Subject Enterprise:		

#### III. Work Outside the Company, including its subsidiaries and affiliates

4. Aside from your employment with the Company, do you engage in the practice of profession outside of work?

☐ Yes ☐ No

If you answered "YES" to the question, please provide the following details:

Third Party Company Name:	
Business Type:	
Days and time when outside work is performed:	
Nature of work performed:	

#### IV. Relatives in the Company, including its subsidiaries and affiliates

5. Is any of your **affiliate** a director, employee, agent, consultant, or advisor in the Company, **including its subsidiaries and affiliates**?

☐ Yes ☐ No

If you answered "YES" to the question, please provide the following details:

Name of Affiliate:	
Name of Company (indicate whether in JGSHI, or subsidiary/affiliate of JGSHI):	
Position:	

Does the affiliate work under your direction, control and supervision, vice versa?

Do you and said affiliate work together or collaborate within the Group? Please provide details:

#### V. Other Conflict of Interest Areas

6. Do you have personal **transactions** (i.e., obtained a **loan**, hired the services, etc.) with any supplier, contractor or business associate of the Company, **including its subsidiaries and affiliates**?

☐ Yes ☐ No

If you answered "YES" to the question, please provide the following details:

Third Party Company Name:	
Name of Supplier, Contractor, Business Associate:	

Details of personal **transactions** (if applicable, including amount/benefit involved):

#### Gifts Disclosure:

1. Did you accept a **gift** from **third-party** donor/s with estimated retail value of OVER P=2,000.00 (OVER PESOS TWO THOUSAND) during Christmas season?

☐ Yes ☐ No

If you answered "YES" to the question, please provide the following details **relevant to the THIRD-PARTY DONOR**:

Name of Third-Party Donor:	
Third Party Company Name:	
Position in his/her Company:	
Nature of Transaction with Third-Party Donor:	
Gift Item & Description:	
Estimated Retail Value:	

I acknowledge and warrant that my personal information and disclosures in this form are accurate and provided voluntarily. I have read and fully understood the Code of Business Conduct and Ethics ("Code") and all related policies as well as undertaken the Business Conduct Refresher Course. I have complied with all my obligations under the Code and disclosed all relevant information herein. I undertake to update my Self-Disclosure Form in case any change occurs within the calendar year. Further, I authorize the Company to verify and investigate any and all of my disclosures. I accept that any misrepresentation that I made may be sufficient cause for my dismissal.

Name and Signature

**DEFINITION OF TERMS**  
1. **Relative** – refers to relative up to the third degree by consanguinity, affinity or legal adoption, including spouse, parents, children and their spouses, siblings (and their spouses), nieces and nephews (limited to children of brother and sisters) (and their spouses), grandparents, and aunts and uncles (limited to sisters or brothers or parents), and a domestic partner and his relatives of up to third degree by consanguinity, affinity or legal adoption.  
2. **Significant Financial Interest** – at least 10% direct or indirect ownership of a business organization. Financial interest also includes employment and contractual relationships.  
3. **Participation** – refers to involvement in a transaction on behalf of the company, if you have acted directly or have recommended, directed, authorized or approved the action of another who has acted for the company in the transaction, or if you have been involved in the selection or specification of the property purchased, sold or leased or the services procured, even though you have not been involved in the actual negotiation or transaction.  
4. **Transactions** – refer to purchases, sales, leases, and contracts for the purchase, sale or lease of property, goods or services of any kind.  
5. **Loan** – refers to a loan of money, property, or services other than a bank loan at prevailing interest rates.  
6. **Affiliate** – refers to any person, entity, organization, business or venture with whom/which an Employee has an affiliation, personal relationship or financial involvement. See full definition in the Conflict of Interest Policy. <https://www.jgsummit.com.ph/corporate-governance/company-policies/conflict-of-interest-policy>  
7. **Third party** – an individual, entity, organization and/or its representatives that has existing and/or intended business dealings with the Company. This includes prospective or existing suppliers, contractors, buyers, dealers and Customers.  
8. **Gift** – a thing(s), present, sponsorships, or any other personal benefit given by Third Parties to Directors, Employees, Consultants with whom they transact, whether directly or indirectly, in relation to Company business dealings, and regardless of the place where such gifts are offered to or received by a Director, Employee or Consultant.  
9. **Subsidiary** – refers to a Company where the Parent Company is the legal or beneficial owner of more than fifty percent (50%) of the issued and outstanding capital stock of the subsidiary company.

Approved by:

(BU Head/CHR, as applicable)/Date

(IECON Secretariat/IECON, as applicable)/Date



JG SUMMIT  
HOLDINGS, INC.

## POLICY

Group	GOKONGWEI GROUP OF COMPANIES	Document No. APP.03.2	Page 1 of 1
Company	JG SUMMIT HOLDINGS, INC. (JGSHI)	Reference (Old Doc.) No. JG CMS Bulletin No. 2023-01	Revision No. 2
Business Unit	CCU	Document / Revision Date 13 November 2024	
Chapter	CORPORATE GOVERNANCE	Effectivity (Approval Date) 13 November 2024	
Section	ANTI-CORRUPTION PROGRAM	Approved by:	
Subject	<b>AMENDED CONFLICT OF INTEREST POLICY – MANUAL SELF-DISCLOSURE OF CONFLICT OF INTEREST FORM FOR DIRECTORS (ON DEMAND OR ANNUAL)</b>		

(Minutes of Board Meeting)  
**BOARD OF DIRECTORS**

### MANUAL SELF-DISCLOSURE FORM OF CONFLICT OF INTEREST For the Board of Directors

Name: \_\_\_\_\_ Date Submitted: \_\_\_\_\_

**INSTRUCTIONS:** Read each question carefully. Answer by ticking either "YES" or "NO" in each answer box. If you answered YES to any of the questions, please provide the necessary details on the space provided. If more space is required, use another sheet, duly signed & attached to this form. Italicized terms are defined at the bottom of this Form.

**I. Dealings/Transactions with a Business Enterprise which is a Major, Direct or Significant Customer, Supplier or Competitor of the Company, including its subsidiaries and affiliates ("Subject Enterprise"):**

1. Are you or any of your **relatives** a director, officer, owner, partner, employee, agent, consultant, or advisor to any Subject Enterprise?

☐ Yes ☐ No

If you answered "YES" to the question, please provide the following details relevant to you, and/or your Relative (if applicable), and to the Subject Enterprise:

Name of Relative (if applicable): \_\_\_\_\_

Director Details	Relative Details
Business Name of Subject Enterprise	
Position	
Business Type	
% of Direct Ownership	
% of Indirect Ownership	
Details of participation in any transaction with the Subject Enterprise	

2. Do you or your **relatives** have a **significant financial interest** in any Subject Enterprise?

☐ Yes ☐ No

If you answered "YES" to the question, please provide the following details relevant to you, and/or your Relative (if applicable), and to the Subject Enterprise:

Name of Relative (if applicable): \_\_\_\_\_

Director Details	Relative Details
Business Name of Subject Enterprise	
Position	
Business Type	
% of Direct Ownership	
% of Indirect Ownership	
Details of participation in any transaction with the Subject Enterprise	

**II. Business Dealings/Transactions Similar to the Work Performed in the Company, including its subsidiaries and affiliates**

3. Do you or your **relatives** have a **significant financial interest** in any business enterprise ("Subject Enterprise") that engages in any business or activity or provides services identical or in any way similar to the work you are charged to perform for the Company, including its **subsidiaries and affiliates**?

☐ Yes ☐ No

If you answered "YES" to the question, please provide the following details relevant to you, and/or your Relative (if applicable), and to the Subject Enterprise:

Name of Relative (if applicable): \_\_\_\_\_

Director Details	Relative Details
Business Name of Subject Enterprise	

Position	
Business Type	
% of Direct Ownership	
% of Indirect Ownership	
Details of Work Performed	
Similar to Subject Enterprise	
Details of participation in any transaction with the Subject Enterprise	

**III. Directorships Outside the Company, including its subsidiaries and affiliates**

4. Aside from the JG Summit Holdings, Inc., do you hold directorships outside the Company, including its **subsidiaries and affiliates**?

☐ Yes ☐ No

If you answered "YES" to the question, please provide the following details:

Third Party Company Name/s	
Business type/s	
Type of Directorship (Executive Director/ Non-Executive Director/Independent Director/Lead Independent Director)	

**IV. Relatives in the Company, including its subsidiaries and affiliates**

5. Is any of your **affiliate** a director, employee, agent, consultant, or advisor in the Company, including its **subsidiaries and affiliates**?

☐ Yes ☐ No

If you answered "YES" to the question, please provide the following details:

Name of Affiliate	
Name of Company (indicate whether in JGSHI, or subsidiary/affiliate of JGSHI)	
Position	

Does the affiliate work under your direction, control and supervision, vice versa?

Do you and said affiliate work together or collaborate within the Group? Please provide details.

**V. Other Conflict of Interest Areas**

6. Do you have personal **transactions** (i.e., obtained a **loan**, hired the services, etc.) with any supplier, contractor or business associate of the Company, including its subsidiaries and affiliates?

☐ Yes ☐ No

If you answered "YES" to the question, please provide the following details:

Third Party Company Name	
Name of Supplier, Contractor, Business Associate	

Details of personal **transactions** (if applicable, including amount/benefit involved)

**Gifts Disclosure:**

1. Did you accept a **gift** from **third-party** donor/s with estimated retail value of OVER Php 2,000.00 (OVER PESOS TWO THOUSAND) during Christmas season?

☐ Yes ☐ No

If you answered "YES" to the question, please provide the following details relevant to the **THIRD-PARTY DONOR**:

Name of Third-Party Donor	
Third Party Company Name	
Position in his/her Company	
Nature of Transaction with Third-Party Donor	
Gift Item & Description	
Estimated Retail Value	

☐ I acknowledge and warrant that my personal information and disclosures in this form are accurate and provided voluntarily. I have read and fully understood the Code of Business Conduct and Ethics ("Code") and all related policies as well as undertaken the Business Conduct Refresher Course. I have complied with all my obligations under the Code and disclosed all relevant information herein. I undertake to update my Self-Disclosure Form in case any change occurs within the calendar year. Further, I authorize the Company to verify and investigate any and all of my disclosures. I accept that any misrepresentation that I made may be sufficient cause for my dismissal.

☐ I authorize the Company to collect, use, store, disclose, modify, transfer, retain and/or otherwise process any personal data stated in this form or I have provided to the Company. I acknowledge that such information may be processed for purposes of evaluating potential or actual Conflict of Interest situations, determining if such are allowed, and/or issuing opinions or advice to concerned Directors to ensure mitigation measures are in place, pursuant to the Company's Conflict of Interest Policy, Manual on Corporate Governance, By-Laws, Code of Business Conduct, or other Company policy or guidelines. I understand that I have a right to access, correct and restrict use of certain personal information upon written notice to the Company, provided the same is still under the control and management of the Company. And that when the Company no longer has any need for my personal information, it will return and/or destroy the same in accordance with relevant investigations.

\_\_\_\_\_  
Name and Signature

#### DEFINITION OF TERMS

- Relative** – refers to relative up to the third degree by consanguinity, affinity or legal adoption, including spouse, parents, children and their spouses), siblings (and their spouses), nieces and nephews (limited to children of brother and sisters) (and their spouses), grandparents, and aunts and uncles (limited to sisters or brothers or parents), and a domestic partner and his relatives of up to third degree by consanguinity, affinity or legal adoption.
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- Subsidiary** – refers to a Company where the Parent Company is the legal or beneficial owner of more than fifty percent (50%) of the issued and outstanding capital stock of the subsidiary company.

Submitted to/Approved by:

\_\_\_\_\_  
(Corporate Secretary/IECON)/Date

\_\_\_\_\_  
(Chairman of the Board, as applicable)/Date