



POLICY

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Company	JG SUMMIT HOLDINGS, INC. (JGSHI)	Reference (Old Doc.) No. Whistleblowing Policy approved May 28, 2018	Revision No. 3
Business Unit	CCU	Document / Revision Date 12 May 2022	
Chapter	CORPORATE GOVERNANCE	Effectivity (Approval Date) 24 June 2022	
Section	ANTI-CORRUPTION PROGRAM	Approved by:	
Subject	WHISTLEBLOWING POLICY	(Original signed) EXECUTIVE COMMITTEE	

POLICY STATEMENT

The Company is committed to conduct business in accordance to the highest ethical and legal standards. In line with this commitment, the Company encourages employees, business partners and other stakeholders to raise concerns about any aspect of the business operation.

OBJECTIVES

1. To encourage employees, business partners and other stakeholders to report concerns involving actual or suspected violations of Company policies, its code of business conduct, criminal or unlawful acts or omissions, and instances when an act or omission endangers the health and safety of the employees.
2. To provide clear procedures and reporting channels for reporting any actual or suspected violation of Company policies, misconduct, malpractice, irregularities or risks against the Company.
3. To protect the Whistleblower against any form of retaliation.

SCOPE AND COVERAGE

1. This policy shall apply to all employees of the Company, employees of third-party service providers, on the job trainees, business partners and other stakeholders of JG Summit Holdings Inc. (JGSHI), its subsidiaries and affiliates unless they have established their own rules and procedures compliant with the principles and objectives herein stated.
2. This Policy shall include, but is not limited to complaints, reports or disclosure of information for acts involving actual or suspected violations of Company code of conduct (i.e. Offenses Subject to Disciplinary Actions - OSDA), Company policies, criminal or unlawful acts or omissions, and instances when an act or omission endangers the health and safety of the employees.

DEFINITION OF TERMS

1. **Complaint** – refers to the verbal or written report containing the disclosure or allegation of violation against Company policy, or any act or omission that is similar to or in the nature of a corrupt practice or unethical behavior resulting to misconduct, malpractice, irregularity or a risk affecting the Company.
2. **Integrity and Ethics Council (IECON)** – refers to the group composed of Corporate Human Resources (CHR), Corporate Internal Audit (CIA)¹ and the General Counsel

¹ Advisory Capacity



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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.

3. **IECON Secretariat** – refers to the group designated by the IECON tasked to receive, perform preliminary evaluation and endorse the Complaint to the IECON.
4. **Investigation Team** – refers to the Company resource group/s designated by the IECON or Management to further conduct the investigation and to provide a report on the results thereof to IECON.
5. **Reporting Channels** – refer to the Company’s designated tool or medium where employees across Gokongwei Group of Companies or external partners and/or stakeholders can securely share feedback, air complaints, and report on non-adherence to company values and policies:
 - 5.1. iSpeak – refers to the digital platform accessible via Employee Service Portal (ESS) and Company Website;
 - 5.2. Mail; and
 - 5.3. E-mail
6. **Respondent** – refers to the employee of the Company who is the subject of the Complaint.
7. **Retaliation** - refers to any act of retribution, discrimination, harassment, intimidation or adverse action by Company officers, executives, supervisors, or employees against a Whistleblower or a Witness.
8. **Whistleblower** – refers to an employee, business partner, other stakeholder or any third party who in good faith discloses information or files the complaint.
9. **Whistleblowing** - refers to the act of filing a verbal or written complaint, by an employee, a business partner of the Company or other stakeholder who, in good faith, reasonably believes that an employee or business partner or stakeholder violated Company policies, or committed any unlawful act or omission or one that is similar to or in the nature of a corrupt practice, unethical behavior, malpractice, misconduct, irregularity or any risk affecting the Company or is aware of any irregularity or circumstances that may have an adverse effect on the Company.



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GENERAL POLICY

Procedure in
Reporting and
Evaluation/
Investigation

10. **Witness** – refers to an employee, business partner, other stakeholder of the Company or any third party other than a whistleblower who has personal knowledge of the violation committed and is willing to participate or cooperate in the investigations or proceedings pertaining to a Complaint.
1. Employees, business partners, other stakeholders or any third party are encouraged to report any actual or suspected irregularity, unethical behavior, misconduct, malpractice, irregularity or a risk via:
 - 1.1. iSpeak;
 - 1.2. Mail; and
 - 1.3. E-mail.
 2. The Whistleblower/Witness shall:
 - 2.1. Provide sufficient information about his personal identity and the reasons for making the complaint/disclosure;
 - 2.2. Provide corroborating evidence to justify the commencement of the investigation;
 - 2.3. Provide truthful information and not act maliciously or make false accusations;
 - 2.4. Report in good faith without seeking personal gain, any suspected violations against Company policies, misconduct, malpractice, irregularity or a risk involving the Company that he believes is substantially true;
 - 2.5. Cooperate with the Investigation Team, including making available for examination all necessary records and information; and
 - 2.6. Refrain from discussing or disclosing the investigation or their testimony with anyone not connected with the investigation.
 3. The IECON Secretariat shall:
 - 3.1. Receive and have access to the reports/complaints;
 - 3.2. Assess the received reports if valid or invalid;
 - 3.3. Conduct a preliminary evaluation if the report is valid;
 - 3.4. if found to be valid, report and endorse to the IECON for their disposition (e.g.,



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investigate, invalidate report, endorse to appropriate group, etc.); and

3.5. Oversee the implementation of this policy, monitor and maintain records of the receipt, disposition and resolution of all reports/concerns and preparation of the necessary report for IECON.

4. The IECON shall:

4.1. Convene after the receipt of an endorsement from IECON Secretariat as described above;

4.2. Utilize the Company's resources from the various Groups in investigating the veracity of the report, coordinate with the relevant Groups with respect to the conduct of administrative investigations and/or the filing/prosecuting the necessary cases in relation to said report. The various Group resources shall form part of the Investigation Team; and

4.3. Ensure the appropriate reporting thereof to the SBU/BU President, JGSHI President and CEO and Audit, RPT and Risk Oversight Committee (AURROC), as may be necessary.

5. The Investigation Team shall:

5.1. Proceed to examination and investigation of the report/complaint filed after endorsement of the report by the IECON;

5.2. Coordinate and collaborate with the relevant people/groups needed in conducting the investigation (including coordination with the concerned employee's immediate superior, conduct administrative investigations, etc.) who shall assist and provide the necessary records, documents or information relevant to the complaint;

5.3. Arrange for interviews with relevant witnesses or individuals;

5.4. Establish the facts, obtain statements and collect evidence;

5.5. Maintain records of the investigation process and ensure compliance with due process procedures;

5.6. Delegate actions and elevate matters as may be necessary, including recommending the conduct of an external investigation; and

5.7. Submit an Investigation Report on its findings and recommendations to IECON.



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|-----------------|---|
| Confidentiality | <p>6. All investigations shall be conducted in accordance with applicable Company policies and requirements of due process.</p> <p>7. All Reports/Complaints, including the identity of the Whistleblower who reported and all the parties involved in the report shall be treated as confidential. The identity of the Whistleblower shall not be revealed without his/her consent, unless the Company is otherwise required by law to disclose the information, or if his testimony is required to further investigate or prosecute the matter, or as may be determined by the IECON.</p> |
| Non-Retaliation | <p>8. The Company shall ensure that the Whistleblower and/or Witness who are employee/s of the Company are protected from any form of retaliation against them.</p> <p style="margin-left: 20px;">8.1. Such retaliation or reprisal tactics include but are not limited to:</p> <ul style="list-style-type: none"> 8.1.1. punitive transfers; 8.1.2. harassment; 8.1.3. reduced duties or hours; 8.1.4. withholding of professional promotion or training; 8.1.5. discrimination and disadvantages in the workplace; 8.1.6. direct and indirect disciplinary action; 8.1.7. loss of seniority rights or benefits; 8.1.8. unfair dismissal; or 8.1.9. threats of other action. <p style="margin-left: 20px;">8.2. However, any action which is similar or analogous to any of the foregoing retaliatory acts, which are set forth as penalties in the Company's code of conduct or company policies, rules and regulations, that may be taken by the Company against an employee who is also a whistleblower/witness shall not be considered retaliation if the Company shows through clear and convincing evidence that the whistleblower/witness-employee has committed or has been involved in any act that is in violation to the Company's Code of Conduct and other policies, whether it is or in no sense connected with or motivated by the act of whistleblowing. The Company may take disciplinary action against an officer or employee who has engaged in retaliatory conduct in violation of this Policy.</p> <p style="margin-left: 20px;">8.3. In the event that an individual who believes he/she has been retaliated against in his/her support to this Policy either as a Whistleblower or as a Witness, he/she shall report the incident and form of protection/corrective action to IECON via</p> |



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email to: iecon@jgsummit.com.ph.

8.4. Request for protection from retaliation shall be subject to evaluation and shall be granted once the retaliatory act is proven valid. This shall be endorsed by IECON for approval of the President and CEO or his designated representative.

False/Malicious Statement

9. This Policy shall not apply when, after due investigation, it is found that the whistleblower intentionally made a false/malicious statement, or that the report made was frivolous or vexatious. In such case the whistleblower may be subjected to sanctions under Company policy, or appropriate law, rule or regulation.

APPENDIX

APP 1 - Reporting Channels Contact Details

EXHIBIT

EXH 1 - Complaint and Disclosure Form

POLICY VIOLATION

Any Violation of this policy shall be dealt with in accordance with the appropriate provision of Offenses Subject to Disciplinary Action (OSDA).

EFFECTIVITY CLAUSE

This policy shall take effect upon approval and shall continue to be in full force unless superseded by new policies and guidelines.



JG SUMMIT
HOLDINGS, INC.

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Below are the reporting channels and their contact details:

Contact Details	
Email Address:	iecon@jgsummit.com.ph
Mailing Address:	Integrity and Ethics Council (IECON) JG Summit Holdings, Inc. 40th Floor Robinsons Equitable Tower ADB Avenue, Cor., Poveda Road, Pasig City Note: Must be sent in sealed envelope clearly marked "Strictly Private and Confidential-To Be Opened by Addressee Only"
iSpeak:	Home - Employee Service Portal (service-now.com)

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JG SUMMIT HOLDINGS, INC.

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STRICTLY CONFIDENTIAL

 COMPLAINT/DISCLOSURE FORM				
NOTE: PLEASE PROVIDE DETAILED INFORMATION AS MUCH AS POSSIBLE				
COMPLAINANT'S INFORMATION				
NAME:		OFFICE ADDRESS:		
SIGNATURE / DATE	EMPLOYEE NO.	E-MAIL ADDRESS:		
COMPANY/DEPARTMENT	DESIGNATION	PHONE NO.	MOBILE NO.	FAX NO.
INFORMATION CONCERNING THE COMPLAINT				
What is the major issue involved?				
<input type="checkbox"/> Violations of Corporate Governance Rules <input type="checkbox"/> Financial and Procedural Malpractice <input type="checkbox"/> Violations of the Code of Discipline <input type="checkbox"/> Others (Please specify)				
What happened? (Please attach additional sheet(s) if necessary)				
How did you know about the subject of the complaint(s)?		Please indicate the physical evidences/ documentations that may support your disclosure.		
<input type="checkbox"/> Personal or direct knowledge <input type="checkbox"/> Others have told me about it <input type="checkbox"/> Others (Please specify)		Documents attached:		No. of Pages
		1.		
		2.		
		3.		
Who is/are the person(s) involved? (Respondent/s) (Please attach additional sheets if necessary)				
NAME	DESIGNATION	COMPANY	DIVISION/GROUP/DEPT.	NATURE OF INVOLVEMENT
Who is/are the possible Witness(es)? (Please attach additional sheets if necessary)				
NAME	DESIGNATION	COMPANY	DIVISION/GROUP/DEPT.	NATURE OF INVOLVEMENT
When did the incident take place? Date/Time/Frequency				
Since when has this been occurring?		Location of evidence:		
How much is involved? Please provide an approximate figure.				
Why are you making this disclosure? (Please attach additional sheet if necessary)				
DISCLOSURE HISTORY		PLEASE ADVISE ON HOW WE MAY CONTACT YOU		
Was the disclosure previously reported to a management level? If yes, to whom was it reported?		<input type="checkbox"/> BY PHONE <input type="checkbox"/> THROUGH E-MAIL <input type="checkbox"/> OTHERS (SPECIFY)		
What do you think was the reason for lack of immediate action?				