



JG SUMMIT
HOLDINGS, INC.

POLICY

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Company	JG SUMMIT HOLDINGS, INC. (JGSHI)	Reference (Old Doc.) No. CORP 9010-Conflict of Interest Policy	Revision No. 1
Business Unit	CCU	Document / Revision Date 03 April 2023	
Chapter	CORPORATE GOVERNANCE	Effectivity (Approval Date) 28 April 2023	
Section	ANTI-CORRUPTION PROGRAM	Approved by:	
Subject	AMENDED CONFLICT OF INTEREST POLICY	(Original signed) EXECUTIVE COMMITTEE	

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, officers, employees, consultants and agents or representatives, 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, every director, employee, consultant is committed to ensure compliance with all applicable laws, rules, regulations and company policies, systems, practice, orders and similar official corporate issuances. In this regard, the Company directors, employees and consultants 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:

2. 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 Anti-Bribery and Anti-Corruption policies and programs.
2. Ensure that business decisions always reflect independent judgment and discretion, and are based on the best interests of the Company.
2. Ensure that actual or potential conflicts of interest are handled and prevented by providing clear guidelines to the Company’s directors, employees and consultants.

SCOPE AND COVERAGE

This Policy covers and applies to:

1. All JGSHI directors, employees, consultants, and those deemed covered by management of the Company, its subsidiaries or affiliates.
2. 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.



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DEFINITION OF TERMS

3. All conflicts of interest are defined herein and shall be read in conjunction with JGSHI's Code of Business Conduct, Anti-Bribery and Anti-Corruption Policy, Whistleblowing Policy, among other Corporate Governance policies.
4. Disclosure, review, resolution, applicable sanctions for the violation of this policy and the exercise of necessary oversight of conflicts of interest.
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 Director/Employee/Consultant and/or his Relative holds a position as director, officer or executive of such corporations or firms;
 - 1.4. Corporations or firms where a Director/Employee/Consultant 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 Director/Employee/Consultant 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 Director/Employee/Consultant or his Affiliate is a general partner;
 - 1.7. A co-ownership in which a Director/Employee/Consultant 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-owner's (who is not the Director/Employee/Consultant 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 Director/Employee/Consultant in view of which a



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Director/Employee/Consultant's decisions or actions in the best interest of JGSHI or its subsidiaries is unduly affected or compromised.

4. **Consultants** – refer 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 if the Company's investors, shareholders, affiliates or partners.
5. **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.
6. **Conflict of Interest** – 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. Conflict of Interest 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.
7. **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.
8. **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, executives, supervisors, rank and file and fixed term employee.
9. **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.



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10. **Handwritten Self-Disclosure Form (HSDF)** – refers to the written document that requires an employee/director/consultant to declare any conflict of interest by answering the guide questions and providing other information.
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 Conflict of Interest matter.
12. **IECON Secretariat** – refers to the group designated to assist the IECON in administrative, reportorial, and other functions.
13. **Online Self-Disclosure Form (OSDF)** – refers to the web-based application that replaces the manual process of annual self-disclosure activity. The digital and paperless Disclosure is intended to help reduce paper cost and saves time related to data administration, and information retrieval and maintenance. This online tool/portal can be accessed by Company employee who is required to declare any conflict of interest.
14. **Personal Benefit** – refers to gain or advantage, whether material or non-material, directly or indirectly provided to or received by a Director/Employee/Consultant 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.
15. **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).
16. **Relatives** – relative 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.



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GENERAL POLICY

17. **Stakeholders** – in this Policy refer to shareholders, directors, officers, employees, consultants, agents, representatives, business partners, and customers of the Company, its subsidiaries and affiliates.
18. **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.

1. As a policy, transactions which are or may have potential of being deemed as Conflict of Interest transactions are prohibited. The business decisions of all Directors/Employees/Consultants 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 Directors/Employees/Consultants have an obligation and are expected to act in the best interests of the Company.
3. All Directors/Employees/Consultants 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, Directors/Employees/Consultants are prohibited from participating in any part of the transactions, dealings or decision-making process with respect to any existing or potential supplier, contractor, business partner, or consultant 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.



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4. All employees that recommend, endorse, or approve the procurement or sale of goods and services shall make a conscious effort to avoid any conflict of interest 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 JGSHI 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 forgoing standards shall also be observed with respect to contracts and transactions between Companies within the Gokongwei Group.

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.
 - 5.1. Gifts;
 - 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. Conflict of Interest 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, Directors/Employees/Consultants shall ensure that they treat each other, as well as prospective employees/consultants, with respect, fairness, 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



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Orientation	<p>preferential treatment or discriminates against any Director/Employee/Consultant or prospective employee/consultant.</p> <p>7. All new employees shall undergo orientation of the Code of Business Conduct; 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 employees shall undergo a refresher course on the said policies, as necessary.</p>
Disclosure as Key Mechanism	<p>8. Many potential conflicts of interest transactions do not constitute actual conflicts or may be acceptable with proper oversight and safeguards. Proper disclosure is the key mechanism to bring potential conflict of interest to light for further evaluation, and for oversight, when necessary.</p> <p>9. Employees shall promptly disclose any potential relationships, actions or transactions (including those involving family members) that reasonably could be expected to give rise to a conflict of interest to the company to ensure that potential conflicts of interest are surfaced and brought to the attention of management. They are required to accomplish the OSDF, HSDF or other reporting channels deemed necessary.</p>
Required Annual Self-Disclosure	<p>10. All current employees are required to accomplish an Annual SDF within fifteen (15) working days after the end of the calendar year or from the date of the email notification from IECON Secretariat.</p> <p>11. Directors shall accomplish an Annual HSDF within fifteen (15) working days after the date of the email notification from the Corporate Secretary, unless already disclosed elsewhere.</p>
Self-Disclosure as Deemed Necessary	<p>12. Employees may submit a new SDF at any time that they would like to disclose new information to avoid potential conflict of interest. They may access and submit through the OSDF or submit the HSDF to CHR.</p> <p>13. As deemed necessary by the Chairman, President and CEO, or CCU Head, the project team members or employees involved in a project may be required to make disclosures concerning potential conflict of interest.</p>



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Procedure	<p>14. The HSDF shall form part of the documents that the Consultant shall accomplish at the start of the engagement. If there are any findings/disclosure of conflict of interest, the CCU Group shall forward the HSDF to the IECON for review and disposition.</p> <p>15. Once employees have submitted an OSDF or HSDF, they must secure approval from the Chief Human Resources Officer and IECON before they may participate in the transaction where they find themselves in a potential or actual conflict of interest.</p> <p>16. Concerned employees must inhibit themselves from any direct or indirect participation or involvement at any stage of the transaction pending approval.</p> <p>17. Concerned employees must cooperate with CHR and IECON by providing information and documents when requested.</p>						
IECON Recommendations	<p>18. IECON recommendation on conflicts of interest situations may be, but not limited, to the following:</p> <p>18.1. Allow the activity to go forward without modification;</p> <p>18.2. Require some specific type of administrative oversight or management;</p> <p>18.3. Ensure withdrawal or reduction of involvement of the concerned from the activity;</p> <p>18.4. Require divestiture of relevant personal interest;</p> <p>18.5. Suspend the project or activity;</p> <p>18.6. Endorse the concerned employee to proper law authorities; or</p> <p>18.7. Other courses of action as deemed necessary.</p>						
Disposition of Potential Conflict of Interest	<p>19. Decision on the course of action to be taken in situations of conflicts of interest, taking into consideration the recommendations of the IECON shall be made by:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="padding: 2px;">Board of Directors through its Chairman</td> <td style="padding: 2px;">For Directors</td> </tr> <tr> <td style="padding: 2px;">President and CEO</td> <td style="padding: 2px;">For Officers of JGSHI</td> </tr> <tr> <td style="padding: 2px;">Chief Human Resources Officer</td> <td style="padding: 2px;">For Employees; and Consultants</td> </tr> </table>	Board of Directors through its Chairman	For Directors	President and CEO	For Officers of JGSHI	Chief Human Resources Officer	For Employees; and Consultants
Board of Directors through its Chairman	For Directors						
President and CEO	For Officers of JGSHI						
Chief Human Resources Officer	For Employees; and Consultants						
Appeal	<p>20. Any appeal by an employee shall be directed to the IECON who shall review the appeal and make recommendations to the Company President and CEO. An appeal can only be made once, within fifteen (15) working days from receipt of notice from the IECON.</p>						



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Confidentiality of Disclosures	21. The decision on the appeal made by the Company President and CEO is deemed final.
	22. All records or information that are provided in the employee's OSDF/HSDf are confidential information.
	23. Any information disclosed as required herein shall be used solely for administering this Policy and may not be used for any other purpose.
Non-Submission of SDF	24. 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).
	25. Employees who do not submit their SDF as per Policy shall be sanctioned following the provisions of the Employee Handbook.
	26. Failure or intentional non-disclosure of information (i.e., it is discovered that employee is involved in a conflict of interest situation) as required in this Policy and Code of Business Conduct shall be sanctioned following the provisions of the Employee Handbook.
Conflict Resolution	27. In cases when a conflict of interest is deliberately concealed or when a solution cannot be found, disciplinary action may be invoked, including termination.
	28. Members of IECON, IECON Secretariat and other concerned group/s who are involved in handling the conflict of interest 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.



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APPENDICES

APP. 01 – Responsibilities

APP. 02.1 – Conflict of Interest Process – Annual Self-Disclosure Activity

APP. 02.2 – Conflict of Interest Process – Self-Disclosure

APP. 03 – Handwritten Self-Disclosure Form (HSDF)

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

EFFECTIVITY

This 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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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; Anti-Bribery and Anti-Corruption; Whistleblowing; and Conflict of Interest;
- 1.2. Assist in the conduct of an annual refresher course of the above-mentioned policies for all employees;
- 1.3. Require Newly-hired employees and consultants to submit their Handwritten SDF (HSDF) prior at the start of employment;
- 1.4. Assist IECON Secretariat in the Annual Online SDF (OSDF) of employees, as necessary;
- 1.5. Review all MSDFs submitted by the newly-hired employees and evaluate replies, as necessary;
- 1.6. Endorse to IECON Secretariat any transaction or matter involving conflict of interest requiring approval or resolution;
- 1.7. Assist the IECON Secretariat in investigating conflict of interest matters as deemed necessary;
- 1.8. Safekeep and file all HSDFs in the 201 files of employees, as necessary; and
- 1.9. Discipline or sanction employees that refuse to provide SDFs.

2. The Directors/Employees/Consultants shall:

- 2.1. Submit an Annual OSDF within fifteen (15) working days after the end of the calendar year or from the date of the email notification from IECON Secretariat in coordination with CHR;
- 2.2. Submit a HSDF to CHR or an OSDF to the IECON Secretariat (iecon@jgsummit.com.ph), at any time that they would like or deemed necessary to disclose new information to avoid potential conflict of interest;
- 2.3. Once employees have submitted a HSDF or OSDF, they must secure approval from the IECON Secretariat before they may participate in the transaction where they find themselves in a potential or actual conflict of interest;
- 2.4. Concerned employees must 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 MSDF/OSDF at any time directed by the JGSHI Chairman, President and CEO, Group Head, SBU Head, Project Head, or IECON;
- 2.6. Report in good faith and provide truthful information in the HSDF/OSDF and other documents;
- 2.7. Cooperate with CHR and IECON including its Secretariat by providing information and documents when requested; and
- 2.8. Assist CHR, IECON and its Secretariat in matters relating to conflict of interest, as necessary.

3. The Agents and Representatives shall:

- 3.1. Accomplish a HSDF/OSDF at any time as directed by the Company and its authorized representatives (e.g., CHR, IECON, etc); and
- 3.2. Cooperate with the Company by providing information and documents when requested.

4. The IECON Secretariat shall:

- 4.1. Receive and have access to conflict of interest reports and disclosures submitted by employees;
- 4.2. Assist the IECON in assessing and reviewing conflict of interest matters endorsed by CHR or received directly from employees;
- 4.3. Coordinate and collaborate with the relevant groups in collecting necessary information and documents relevant to the conflict of interest referrals;
- 4.4. Submit reports to the IECON on relevant conflict of interest matters received; and
- 4.5. Assist in any other matter assigned by the IECON relating to conflict of interest.

5. The IECON shall:

- 5.1. Convene after receipt of an endorsement from IECON Secretariat;
- 5.2. Review relevant OSDF information and determine the proper level of management of conflicts;
- 5.3. Ensure that due process is undertaken in reviewing actual or potential conflict of interest situations;



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- 5.4. Utilize the Company’s resources from the various groups and direct the former to provide further information, investigate, or prosecute any conflict of interest matter, as necessary;
- 5.5. Adjudicate and recommend the course of action to be taken on all matters relating to conflicts of interest 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. IECON shall endorse to the following for approval its final decision on conflicts of interest cases:

Board of Directors through its Chairman	For Directors
President and CEO	For Officers of JGSHI
Group Head	For Employees under his/her supervision; and Consultants
 - 5.5.3. Any appeal by an employee can be made only once and within fifteen (15) days from receipt of notice of decision by IECON.
 - 5.5.4. IECON shall review the appeal and make a recommendation to the President and CEO for final decision.
- 5.6. Ensure appropriate reporting of conflicts of interest to the SBU/BU President, JGSHI President and CEO, and Corporate Governance and Sustainability Committee or any other board or management committee, as may be necessary.



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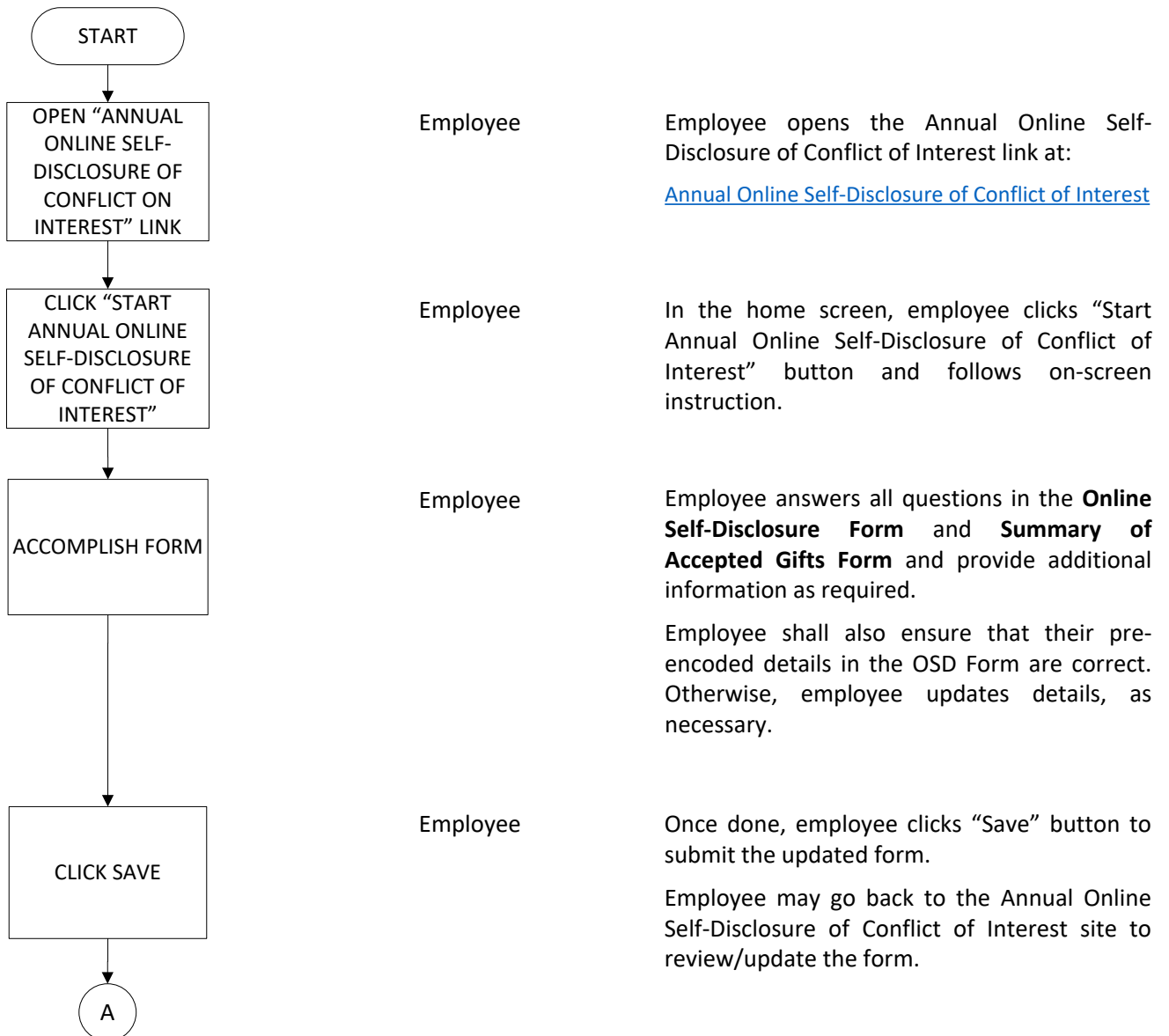
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Chapter	CORPORATE GOVERNANCE	Effectivity (Approval Date) 28 April 2023	
Section	ANTI-CORRUPTION PROGRAM	Approved by:	
Subject	AMENDED CONFLICT OF INTEREST POLICY - ANNUAL SELF-DISCLOSURE ACTIVITY	(Original signed) EXECUTIVE COMMITTEE	

PROCEDURAL FLOW

RESPONSIBLE

DETAILED ACTIVITIES





JG SUMMIT HOLDINGS, INC.

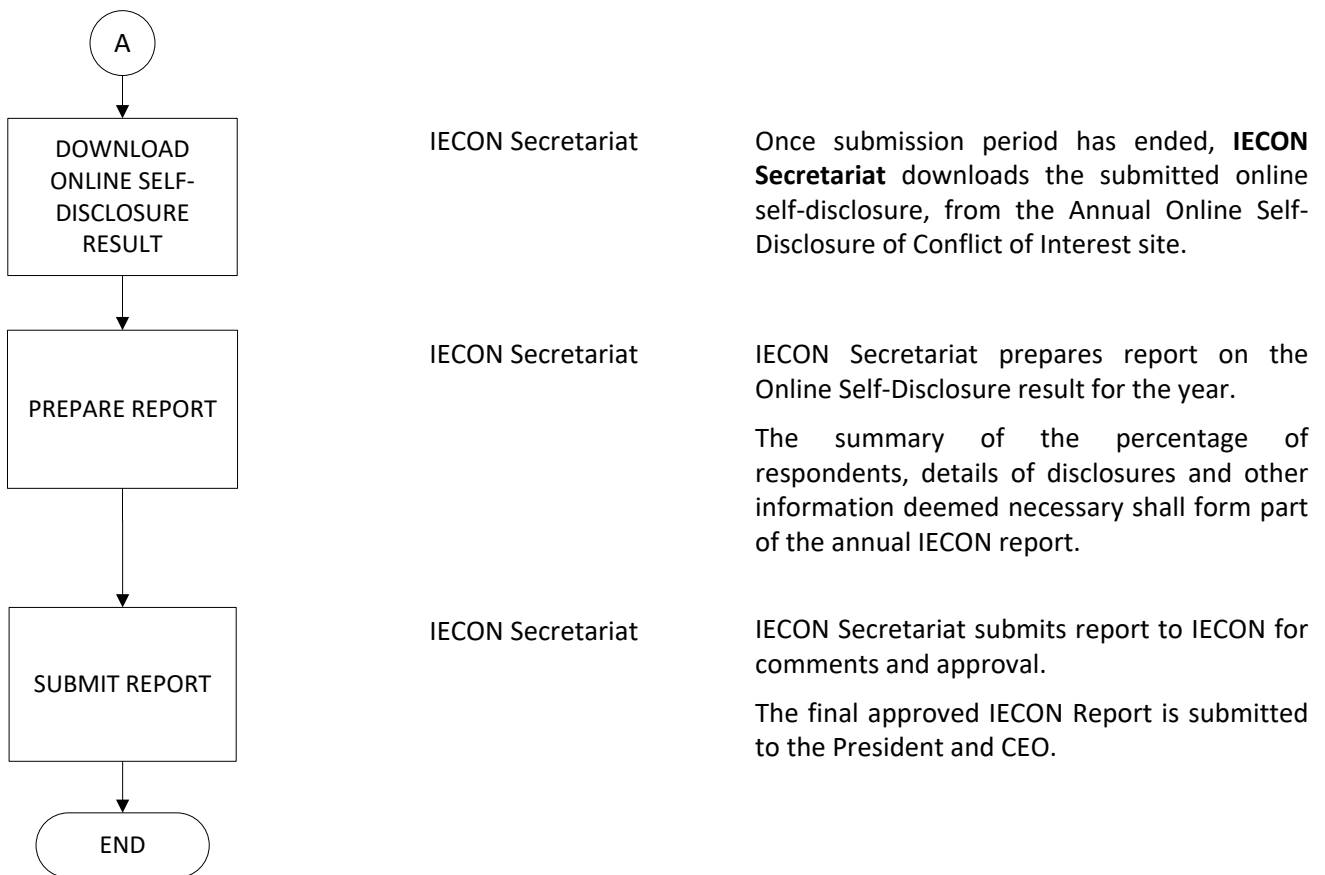
POLICY

Group	GOKONGWEI GROUP OF COMPANIES	Document No. APP.02.1	Page 2 of 2
Company	JG SUMMIT HOLDINGS, INC. (JGSHI)	Reference (Old Doc.) No. CORP 9010-Conflict of Interest Policy	Revision No. 1
Business Unit	CCU	Document / Revision Date 03 April 2023	
Chapter	CORPORATE GOVERNANCE	Effectivity (Approval Date) 28 April 2023	
Section	ANTI-CORRUPTION PROGRAM	Approved by:	
Subject	AMENDED CONFLICT OF INTEREST POLICY - ANNUAL SELF-DISCLOSURE ACTIVITY	(Original signed) EXECUTIVE COMMITTEE	

PROCEDURAL FLOW

RESPONSIBLE

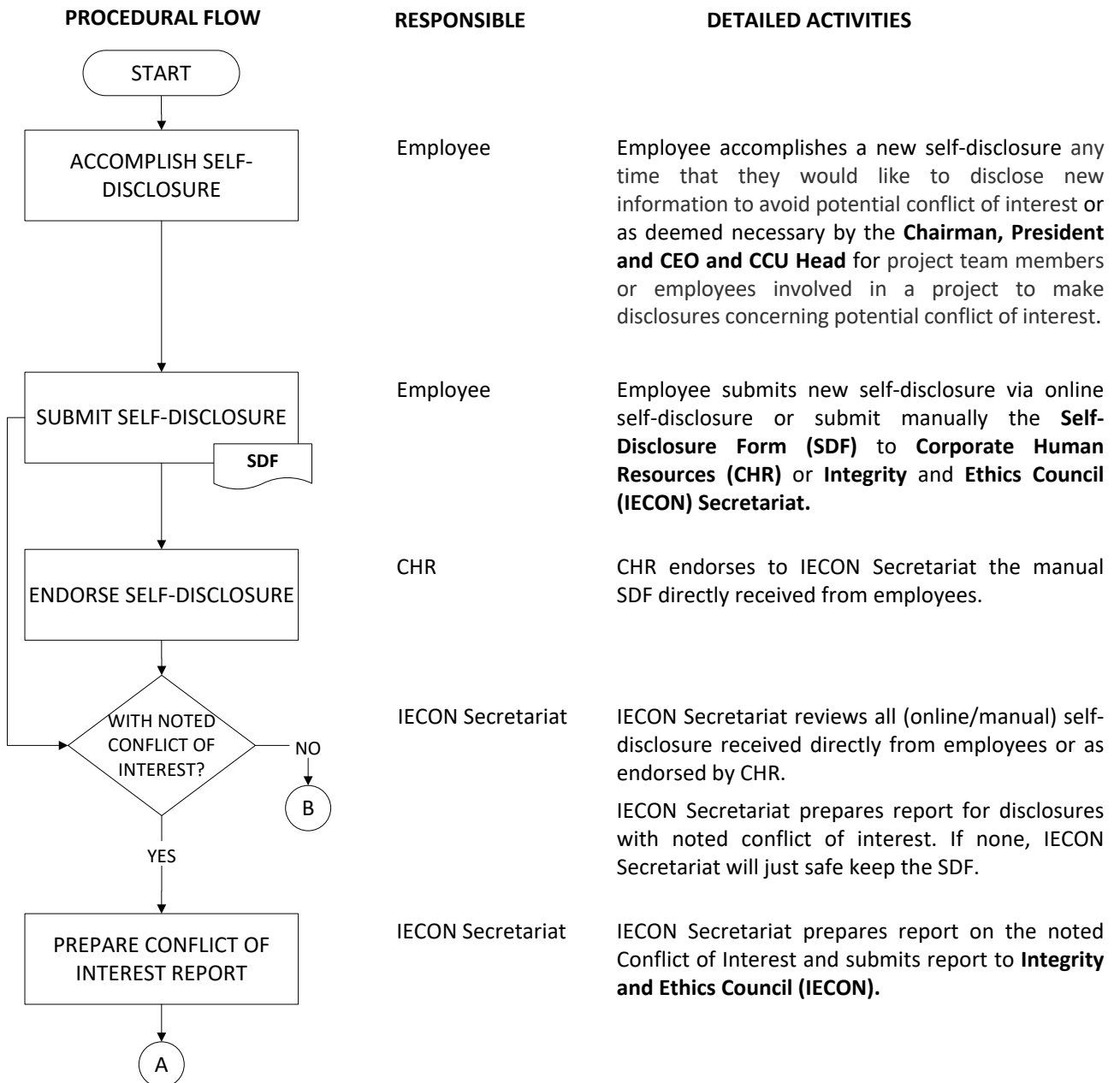
DETAILED ACTIVITIES





POLICY

Group	GOKONGWEI GROUP OF COMPANIES	Document No. APP.02.2	Page 1 of 2
Company	JG SUMMIT HOLDINGS, INC. (JGSHI)	Reference (Old Doc.) No. CORP 9010-Conflict of Interest Policy	Revision No. 1
Business Unit	CCU	Document / Revision Date 03 April 2023	
Chapter	CORPORATE GOVERNANCE	Effectivity (Approval Date) 28 April 2023	
Section	ANTI-CORRUPTION PROGRAM	Approved by: (Original signed) EXECUTIVE COMMITTEE	
Subject	AMENDED CONFLICT OF INTEREST POLICY – SELF-DISCLOSURE (DEEMED NECESSARY) PROCESS		

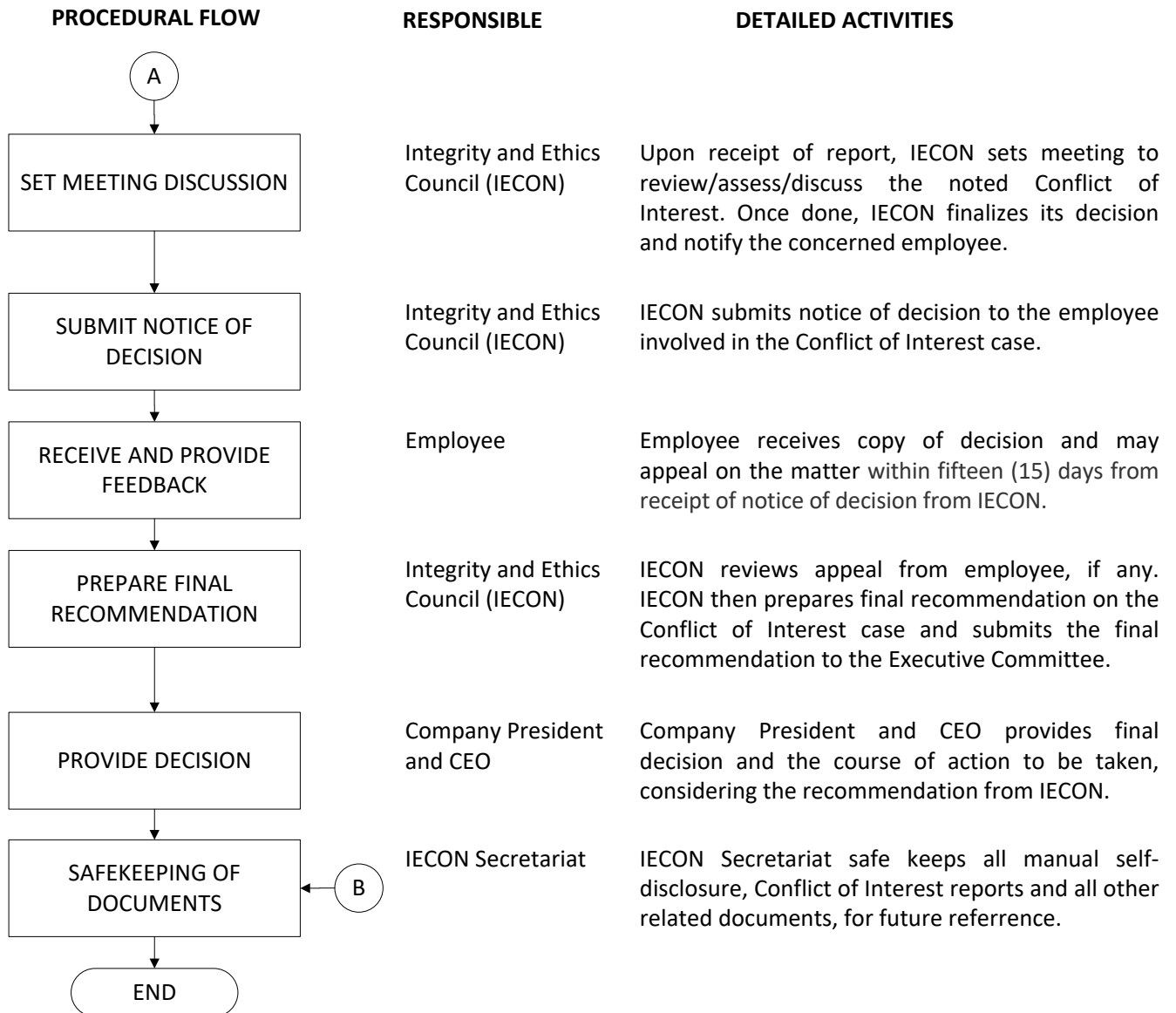




JG SUMMIT HOLDINGS, INC.

POLICY

Group	GOKONGWEI GROUP OF COMPANIES	Document No. APP.02.2	Page 2 of 2
Company	JG SUMMIT HOLDINGS, INC. (JGSHI)	Reference (Old Doc.) No. CORP 9010-Conflict of Interest Policy	Revision No. 1
Business Unit	CCU	Document / Revision Date 03 April 2023	
Chapter	CORPORATE GOVERNANCE	Effectivity (Approval Date) 28 April 2023	
Section	ANTI-CORRUPTION PROGRAM	Approved by: (Original signed) EXECUTIVE COMMITTEE	
Subject	AMENDED CONFLICT OF INTEREST POLICY – SELF-DISCLOSURE (DEEMED NECESSARY) PROCESS		





JG SUMMIT
HOLDINGS, INC.

POLICY

Group	GOKONGWEI GROUP OF COMPANIES	Document No. APP.03	Page 1 of 1
Company	JG SUMMIT HOLDINGS, INC. (JGSHI)	Reference (Old Doc.) No. CORP 9010-Conflict of Interest Policy	Revision No. 1
Business Unit	CCU	Document / Revision Date 03 April 2023	
Chapter	CORPORATE GOVERNANCE	Effectivity (Approval Date) 28 April 2023	
Section	ANTI-CORRUPTION PROGRAM	Approved by:	
Subject	AMENDED CONFLICT OF INTEREST POLICY - HANDWRITTEN SELF-DISCLOSURE FORM (HSDF)	(Original signed) EXECUTIVE COMMITTEE	

HAND WRITTEN SELF-DISCLOSURE FORM

Name	<input type="text"/>	Date Prepared	<input type="text"/>	
Position	<input type="text"/>	BU/CCU	<input type="text"/>	
Department	<input type="text"/>	Company/Division	<input type="text"/>	
Employment Status	<input type="checkbox"/> Regular	<input type="checkbox"/> Fixed Term	<input type="checkbox"/> Probationary	<input type="checkbox"/> Consultant

INSTRUCTIONS: Read each question carefully. Answer by printing either "YES" or "NO" in each answer box. All terms **IN BOLD FONT** are defined at the bottom of this Form.

1. Are you or is any member of your **relatives** a director, officer, sole owner, partner, employee, agent, consultant, or advisor to any business enterprise that to your knowledge or belief is a **MAJOR, DIRECT OR SIGNIFICANT CUSTOMER or SUPPLIER or COMPETITOR** of the Company?
2. Do you or does any member of your **relatives** have a **significant financial interest** in any business enterprise that to your knowledge or belief is a **MAJOR, DIRECT OR SIGNIFICANT CUSTOMER or SUPPLIER or COMPETITOR** of the Company?
3. Do you or does any member of your **relatives** have a **significant financial interest** in any business enterprise that to your knowledge or belief 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?
4. Is any member of your **relatives** a director, officer, employee, agent, consultant, or advisor of the Gokongwei Group?
5. Will you participate on behalf of the Company in any transaction with any of the business enterprises that you have named in your answers to question 1, 2, 3 or 4?
6. Aside from your employment with the company, will you engage in the practice of profession outside of work?

If you answered YES to any of the above questions, please give details (such as company name, name of the relative/s, position, type of business, & the like). If more space is required, use another sheet, duly signed & attached to this FORM.

I acknowledge that I have completed the Business Conduct and Ethics refresher course and have fully understood the Code of Business Conduct, and all other policies therein. I hereby certify that I am not engaged in any activity that conflicts with the said Code. I affirm to the best of my knowledge and belief that all answers to the foregoing are true and correct. I understand and accept my obligation to disclose in a timely fashion any interest that I, or my relatives, might have. I also authorize the company to make inquiries to the above without liability arising therefrom. I will comply with any conditions or restrictions imposed by the company to manage conflicts of interests. I understand that I am responsible for full and continuous compliance with these policies in my activities on behalf of the Company. Except as otherwise specified and noted in the Annual Online Self-Disclosure, I have been, I am presently, and will continue to be in full compliance with the policies in the Code of Business Conduct. Furthermore, I acknowledge that any misrepresentation in the foregoing answers and data, which may be subsequently found, shall be sufficient cause for my dismissal. Should the above statements change during the calendar year that require change in my answers on any of the above questions, I agree to update this Disclosure Form.

Employee's Signature/Date

DEFINITION OF TERMS

- Relative** – refers to relative 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.
- Significant Financial Interest** – at least 10% direct or indirect ownership of a business organization. Financial interest also includes employment and contractual relationships.
- Transactions** – refer to purchases, sales, leases, and contracts for the purchase, sale or lease of property, goods or services of any kind.

Reviewed by BU/CHR/Date

Reviewed by IECON/Date