

**JOLLIBEE FOODS CORPORATION
AND SUBSIDIARIES**

Anti-Bribery and Corruption Policy

Jollibee Foods Corporation

Internal Use

The information contained within is to be used solely by authorized employees and should not be disclosed to others nor distributed outside of the Jollibee Foods Corporation. Only signed and updated documents are to be used and circulated within the organization and/or by appropriate personnel.

Jollibee Foods CORPORATION	ANTI-BRIBERY AND CORRUPTION POLICY	
	Effectivity Date: 01-Sep-2021	Prepared by: VFA
	Revision No:000	Reviewed by: Region Counsels/Global Ethics Council/ETM/TTC
Document Code: CHR 68	Owners: Global HR and Global Legal and Ethics	Approved by: Global Ethics Council
Document Applicability: This policy covers the JFC Group and persons acting on its behalf.		Internal Use
Reason for Revision: New		

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1. Policy Title

The **Policy on Anti-Bribery and Corruption** formalizes and operationalizes the JFC Group's policy on compliance with laws on anti-bribery and corruption.

2. Policy Statement/Overview

Our Code of Business Ethics ("CoBE") provides that Jollibee Foods Corporation (together with its Subsidiaries, the "JFC Group") conducts business with integrity, and is committed to doing business lawfully. Bribery and corruption are not only contrary to the JFC Group's values, but will also expose both the employee and the JFC Group to fines, penalties, and/or imprisonment to the extent that these are prohibited by applicable laws, as well as reputational damage.

3. Purpose

This policy supports the implementation of JFC Group's COBE and the Company's compliance with anti-bribery and corruption laws.

4. Responsibility and Scope

All Global Heads and all Region Heads shall ensure the effective implementation of this ABC Policy.

1. All employees have the duty to report violations of this policy through any of the channels authorized under the CoBE and to cooperate with investigations initiated under this policy. Confidentiality shall be respected in accordance with the CoBE and its implementing processes.
2. This ABC Policy shall be reviewed and, if necessary, updated by Global Legal & Ethics, subject to the review and approval of the Global Ethics Council.
3. Global Internal Audit shall conduct periodic reviews to determine whether appropriate measures are in place to detect and deter bribery and corruption, assess the effectiveness of such measures, and recommend needed improvements.

As with other policies and procedures of the JFC Group, compliance with this Policy is required of all employees, and noncompliance shall be deemed a violation of company policy for which the relevant JFC Group entity may impose appropriate sanctions, including termination, without prejudice to criminal prosecution if applicable.

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5. Terms and Definitions

“ABC Policy” means this Policy on Anti-Bribery and Corruption.

“CoBE” has the meaning ascribed thereto in paragraph 1, General Statement of Policy.

“JFC Group” has the meaning ascribed thereto in paragraph 1, General Statement of Policy.

“Subsidiary” shall mean an entity in which Jollibee Foods Corporation has a direct or indirect controlling interest of more than 50%.

6. Guidelines

1. In accordance with our company values and following the highest level of ethical standards, the JFC Group does business, builds relationships, and makes decisions based on merit. We do not seek to influence others or obtain any advantage or allow ourselves to be influenced or give to others any advantage, on the basis of gifts or favors.

Without limiting the generality of the foregoing, the following are strictly prohibited:

- (a) making, offering, promising, or authorizing the payment of money or giving of anything of value directly or indirectly to any person, for the purpose of influencing their decisions or actions in order to facilitate, obtain or retain business; or
- (b) accepting any offer, promise, or gift of money or anything of value directly or indirectly from a party with whom the JFC Group does business or that seeks to do business with the JFC Group, for the purpose of influencing the recipient’s decisions or actions in order to facilitate, obtain, or retain business.

The foregoing is further subject to JFC Group’s Policy on Gifts.

2. The JFC Group requires its directors, officers and employees to comply with anti-bribery and corruption laws applicable in the regions where they respectively do business and that may be applicable to them regardless of location. Any violation of applicable laws shall likewise be a violation of this ABC Policy. Where applicable laws are stricter than this ABC Policy, the applicable laws shall prevail.

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3. No payment by or on behalf of any JFC Group entity shall be approved or made if any portion thereof is intended to be used, directly or indirectly, for purposes contrary to applicable anti-bribery and corruption laws or this ABC Policy.

4. The JFC Group shall take appropriate measures towards making its directors, officers and employees aware of this ABC Policy as well as applicable anti-bribery and corruption laws in a particular region. Anti-bribery and corruption topics shall form part of the regular Ethics mandatory training for the JFC Group's employees. This ABC Policy shall likewise be posted in the JFC Group's external website as well as the relevant internal information portal.

5. The JFC Group shall inform the parties with whom it does business of its commitment to compliance with anti-bribery and corruption laws and shall likewise require them to comply with anti-bribery and corruption laws applicable to them. This requirement shall be expressly stated in JFC Group's standard contracts.

6. This Policy shall be read in conjunction with other JFC Group policies, including without limitation the *CoBE*, *Policy on Conflict of Interest*, and *Policy on Gifts*.

7. Any person who knowingly aids, abets, conceals, or permits the violation of any applicable anti-bribery or corruption law or this ABC Policy, shall likewise be in violation of this ABC Policy.

7. Related Documents

Document Name	Document Type
CoBE	Standards
Policy on Conflict of Interest	Policy
Policy on Gifts	Policy

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