
	WHISTLEBLOWING POLICY	
	Effective Date: October 1, 2016	Prepared by: Valerie Amante
	Revision No:01	Reviewed by: Global Ethics Council: William Tan Untiong, <i>Chairman</i> Arsenio Sabado, <i>Chief HR Officer</i> Frank Sheng, <i>Global Internal Audit Head</i> Valerie Amante, <i>Global General Counsel &amp; Ethics Head</i>
<b>Document Code:</b> GLET-ETGL-P001	Owner: Global Legal & Ethics	Approved by: William Tan Untiong,  <i>Chairman, Global Ethics Council</i>
<b>Document Applicability:</b> JFC Group		
<b>Reason for Revision:</b> Upgraded Whistleblowing Hotline, Updated Policies		

## 1. Rationale

This Whistleblowing Policy (“Policy”) formalizes the mechanism by which any party within or outside the organization with concerns about possible violations of the Code of Business Ethics (“CoBE”) may report such concerns to Jollibee Foods Corporation/the relevant subsidiary (each, a “Company”) anonymously and without fear of reprisal.

## 2. Coverage

This policy applies to Jollibee Foods Corporation and subsidiaries (the “JFC Group”).

## 3. Definition of Terms

“**Whistleblower**” refers to a person within or outside the JFC Group who reports in good faith any suspected past, present, or imminent activity, or an attempt to conceal an activity, that violates the CoBE. Examples of reportable violations of the CoBE are in paragraph 4.

“**Hotline**” means the third party reporting channel specified in paragraph 5, which may be reached via website, email, or toll-free number.

## 4. Protection to Whistleblowers

Whistleblowers who report in good faith are entitled to choose to remain anonymous. To this end, the JFC Group has engaged the services of an impartial third party hotline provider to receive and process whistleblower

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reports which will be treated with confidentiality, which will then be reported to the JFC Group without identifying information, should this be the Whistleblower's preference.

Whistleblowers who file reports pursuant to this Policy in good faith are entitled to protection from retaliation in any form, including without limitation discrimination, harassment, unwarranted disciplinary action, or unfair dismissal. The Company shall take appropriate action against anyone who initiates or threatens retaliation against those who have raised concerns under this Policy, including without limitation disciplinary action and dismissal (for internal parties) or appropriate legal actions (for internal or external parties) .

## 5. **Reportable Matters**

Employees have the duty to report in good faith any suspected past, present or imminent activity, or an attempt to conceal an activity, that violates the CoBE or other JFC Group or Company policies. Non-employees may also report violations to the Hotline. Reportable matters include but are not limited to:

- Bribery and Corruption
- Conflict of Interest
- Unauthorized Gifts
- Fraud and Embezzlement
- Substance Abuse
- Criminal Activity
- Harassment and/or Discrimination
- Information Security violations
- Privacy violations
- Violence and/or Abuse
- Workplace Health and/or Safety violations
- Breach of Legal Obligations
- Fraudulent Financial Reporting and Accounting
- Violation of the CoBE and other company policies and/or procedures
- Noncompliance with Company approval limits
- Misuse or misappropriation of company resources
- Retaliation
- Other similar violations

## 5. **Reporting Channels**

Whistleblower reports (other than for Smashburger) may be made to the Hotline as follows:

- *Website:* <https://www.integritycounts.ca/org/jollibeeigroup>
- *Email:* [jollibeeigroup@integritycounts.ca](mailto:jollibeeigroup@integritycounts.ca)
- *Toll Free Telephone Numbers:*
  - Philippines - 1800 1 322 0363

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- United Kingdom - 0-800-092-3586
  - Italy - 00-800-2002-0033
  - Spain - 900 876 122
  - Vietnam - 120-85-2329
  - USA - 1-866-921-6714
  - Canada - 1-866-921-6714
  - China - 400-120-8514

Smashburger shall continue to receive reports through its current hotline's channels provided below:

- *Website: <http://www.lighthouse-services.com/smashburger>*
- *Email: [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com) (must include company name with report)*
- *Telephone Numbers:*
  - English speaking USA and Canada: 844-640-0022 (not available from Mexico)
  - Spanish speaking North America: 800-216-1288
- *Fax alternative for written documents:*
  - 215- 689-3885 (must include company name with report)

Other contact channels may be provided by the Global General Counsel and Ethics Head in a supplement to this policy.

An employee who receives information that is reportable under this Policy must not act on the matter on his/her own, but report the matter to the Hotline.

## 6. **Investigation**

Upon receipt of a report from a Whistleblower, the matter shall be investigated by the appropriate internal office, depending on the nature of the report. The Company shall also have the discretion to engage the services of external investigators. Based on the results of such investigation, the Company shall determine the appropriate Company response, which shall at all times be subject to the requirements under applicable laws.

## 7. **False Reports**

Should it be determined, after due investigation, that a person knowingly made false allegations and/or presented fabricated evidence, such person shall be subject to disciplinary action pursuant to the Company's rules and/or subject to legal action pursuant to applicable laws.

## 8. **Implementation**

The Global General Counsel & Ethics Head of the JFC Group may, from time to time, update this Policy, and/or issue supplements and/or implementing guidelines.