



Anti-Bribery and Corruption Policy

I. OVERVIEW

- 1.1 The Company adopts a zero-tolerance policy on all offenses against honesty and integrity, including acts of corruption, extortion and bribery.
- 1.2 Globe employees (“Employees”) are expected to maintain the highest standards of honesty, integrity and professional conduct. Employees are bound not to betray that trust by seeking to gain any undue personal or pecuniary advantage (other than the rightful proceeds of employment) from their dealings with, or for and on behalf of the Company.
- 1.3 The Company and Employees are bound to adhere to all relevant anti-bribery and corruption laws in the Philippines, including the Anti-Graft and Corrupt Practices Act¹, the Revised Penal Code of the Philippines², and other similar anti-bribery laws where we do business.
- 1.4 This Anti-Bribery and Corruption Policy (this “Policy”) covers both Employees, members of the Board of Directors, and all third parties representing or transacting with the Company, and is to be read in conjunction with all other related policies of the Company including the [Globe Code of Conduct](#), which promulgates policies governing the following matters: (i) Conflict of Interest, (ii) Whistleblowers, (iii) Insider Trading, (iv) Related Party Transactions, and (v) Health and Safety. These policies promulgated pursuant to the Code of Conduct serve as guide to matters involving work performance, dealings with employees, customers and suppliers, handling of assets, records and information, avoidance of conflict of interest situations and corrupt practices, as well as the reporting and handling of complaints from whistleblowers.

II. CORRUPTION, EXTORTION, AND BRIBERY

- 2.1 Corruption, extortion and bribery occurs when an an Individual directly or indirectly facilitates, demands, requests, solicits, receives, or accepts any commission, share, or consideration, monetary or otherwise, for himself or for another person, in connection with any contract or transaction entered into by the Company, or in connection with the performance of his duties, or by reason of his position or office.³
- 2.2 The following are specific instances, but do not limit the definition, of corruption, extortion and bribery:
 - 2.2.1 Gifts, hospitality, travel and entertainment: It is the responsibility of the person extending or receiving such gift, hospitality or travel and entertainment benefit to ensure that it is within a nominal threshold, does not facilitate illicit action, and is in strict compliance with [Globe’s Practice on Gift Disclosure](#), this Policy and other relevant Company policies.
 - 2.2.2 Illicit payments: Payments to government officials to facilitate access to goods, services, and/or information to which the public is not entitled, to deny the public access to goods

¹ Republic Act No. 3019, otherwise known as the “Anti-Graft and Corrupt Practices Act,” 17 August 1960.

² Republic Act No. 3815, otherwise known as the “Revised Penal Code,” 08 December 1930.

³ Globe Code of Conduct.

and services to which it is legally entitled, or prevent the application of rules and regulations in a fair and consistent manner.

- 2.2.3 Training, testing and seeding devices: The receipt of any devices (handsets, tablets, laptops or accessories) shall be for a specific purpose, such as but not limited to training, testing and seeding, and in strict compliance with this Policy and other relevant Company policies.
 - 2.2.4 Charitable contributions: Charitable contributions shall not in any manner be used as a means of concealing a bribe or other form of corruption, and shall be made and/or received in strict compliance with this Policy and other relevant Company policies.
 - 2.2.5 Political contributions: Company resources, including funds or facilities, shall not be used to provide support for, or contribute to, any partisan or political organisation, or individual candidate. The Company shall continue to support digital and connectivity efforts of the Philippine government as a non-partisan and apolitical institution. Participation in any partisan political activities by Employees shall strictly remain as a personal matter, and shall be done in strict compliance with this Policy and other relevant Company policies.
 - 2.2.6 Sponsorships: The provision of sponsorships by the Company shall be in strict compliance with the Policy and other relevant Company policies.
- 2.3 Vendors and suppliers, contractors and other parties with whom Globe does business are also covered and expected to comply with the Policy, the [Supplier Code of Ethics](#), the [Sustainable Supply Chain Policy Commitment](#), and contractual documents.

III. COMPLIANCE AND PROCEDURES

- 3.1 Employees, in full compliance of the Policy, are expected to:
 - 3.1.1 Not give or offer to give or authorize to give anything of value that could be considered to be a bribe;
 - 3.1.2 Not request or accept or authorize the request or acceptance of, directly or indirectly, anything of value that could be considered to be a bribe;
 - 3.1.3 Know what the Policy means and comply with it, always exercising good sense;
 - 3.1.4 Report as soon as possible any suspected breaches of the Policy.
- 3.2 Leaders of the Company, in implementing and enforcing the Policy, are expected to:
 - 3.2.1 Ensure that all employees in their respective teams and departments have completed the relevant training, are aware of the need to comply with the Policy, and receive regular reminders to comply;
 - 3.2.2 Act upon reports as soon as possible to address any suspected breaches of the Policy in their respective teams and departments in accordance with the processes and policies in place;
 - 3.2.3 Assist and cooperate with the relevant teams, departments and government authorities, as applicable, in the implementation and enforcement of the Policy and applicable laws, rules and regulations;

- 3.3 All records relating to commissions, travel and entertainment shall be retained by the Human Resources Group - Official Records, who shall ensure that all records are up-to-date, accurate, complete and accessible for review.
- 3.4 Employees are reminded through internal communications channels to fill out [gift disclosures](#). The form is then submitted to Employees' respective group heads who will decide whether the gift shall be returned, kept by the Employee, or be surrendered to Human Resources Group for possible use during company events.

IV. CONSEQUENCES OF VIOLATION

- 4.1 Violations of the Policy shall be subject to the highest level of disciplinary action, where substantiated offenses are subject to the penalty of dismissal in accordance with the Code of Conduct, and possible criminal and civil action, as warranted by circumstances.

V. MONITOR AND REVIEW

- 5.1 The Policy will be regularly reviewed and updated as needed to ensure it continues to be adequate and effective.
- 5.2 The Company shall periodically monitor and review its overall compliance as an institution with the Policy.

VI. RELEVANT POLICIES

- 6.1 Also read [Code of Conduct](#); [Practice on Gift Disclosure](#); [Supplier Code of Ethics](#); [Whistleblower Policy](#); [Manual of Corporate Governance](#).

Approved by:

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