POLICY STATEMENT

Universal Robina Corporation ("URC" or the "Company") shall continue to uphold its commitment to the highest standards of integrity as one of its core values. It is the duty of employees to avoid acts which might adversely reflect on the Company's reputation and to honorably act in all dealings with stakeholders, consistently upholding the principle of always doing the right thing because it is the right thing to do, even when no one else is watching.

OBJECTIVES

The objectives of this Policy are:

1. To strengthen and solidify the Company's stand to maintain ethical and responsible business conduct and to avoid all opportunities for bribery and corruption;
2. To provide and promote guidelines on the prevention of bribery and corruption, anchored on the Company's Code of Business Conduct and Ethics and Conflict of Interest Policy;
3. To set out clear limitations and stipulate guidance on how to identify and deal with actual or potential bribery and corruption issues, including handling of Gifts, Entertainment and Sponsored Travel, as defined herein, (collectively referred to as "**GEST**") given to or accepted from Third Parties;
4. To assert steadfast compliance with existing laws and regulations against bribery and corruption which include:
    4.1. Revised Corporation Code (Republic Act No. 11232, s. 2019);
    4.2. Ease of Doing Business and Efficient Government Service Delivery Act of 2018 (Republic Act No. 11032, s. 2018);
    4.3. Presidential Decree on Giving Gifts to Public Officers (Presidential Decree No. 46, s. 1972);
    4.4. Anti-Graft and Corrupt Practices Act (Republic Act No. 3019, as amended, s. 1960);
    4.5. Revised Penal Code, as amended (Republic Act No. 3815, as amended, s. 1930); and
    4.6. Code of Conduct and Ethical Standards for Public Officials and Employees (Republic Act No. 6713, s. 1989)

SCOPE AND COVERAGE

This Policy covers all actual or potential acts of bribery and corruption, and handling of **GEST** given to or accepted from Third Parties likewise defined herein. This shall be read in conjunction with URC's Code of Business Conduct and Ethics, Conflict of Interest Policy, Whistleblowing Policy, Code of Discipline and Offenses Subject to Disciplinary Action (OSDA).

This Policy covers and applies to below "Covered Persons":

1. All URC directors and employees ("Directors and Employees").
    1.1. **Director** – refers to member of Board of Directors, i.e., the governing body elected by the shareholders, which exercises the corporate powers of a corporation and conducts all its business and controls its properties.
    1.2. **Employee** – refers to any individual hired by URC 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 URC's officers, supervisors, rank and file, whether regular or probationary, as well as fixed-term employees (i.e., those who retired at 60 years old and whose employment services are re-contracted for a pre-determined period of time).

2. All URC agents or representatives, consultants (new and current), on-the-job trainees, and other similar roles ("Engaged Personnel")

   2.1. **Agent or Representative** – refers to any person who acts on behalf, or who is authorized to perform acts or participate in transactions, of the Company.

   2.2. **Consultant** – refers to and includes professional consultants, firms, partnerships, counsels, or such other entities or individuals rendering professional or specialized expert services to URC, as well as advisors who may be appointed by the Board of Directors or the President and CEO.

   2.3. **On-the-Job Trainee** – refers to an individual who is undergoing training in a practical work environment to acquire specific skills or knowledge related to a job or profession. The training typically involves a combination of instruction and hands-on experience under the supervision of experienced employees or trainers.

   Coverage under this provision notwithstanding, Engaged Personnel are not under the supervision and control of the Company as employees, but are contractually subject to the requirements, standards and prohibitions provided in this Policy.

DEFINITION OF TERMS

1. **Applicable Laws** – refer to laws against bribery and corruption, as mentioned in Item 4 of the OBJECTIVES section, and in APP.02 of this Policy, including their respective implementing rules and regulations, amendments or supplements, and other laws or regulations repealing and supplanting them.

2. **Bribe** – refers to any item of value given with the intent or purpose of gaining improper advantages or benefits, influencing any action or decision of the recipient, especially that of a Government Office/Official, or inducing the official to act, refrain, or fail to act in violation of their legal duties. Examples include:

   2.1. **Facilitation Payment** – refers to a payment to a Government Office/Official or Third Party to get approval for permits, licenses or other business activities or to expedite the processing of certain transactions.

   2.2. **Kickback** – refers to the incentive paid to a person or third party who facilitated a transaction or for the preferential treatment in a decision-making process.

3. **Bribery** – refers to the offering, giving, receiving, or soliciting of any item of value to influence one's actions, the actions of Third Parties, as defined

hereunder.

4. **Corporate Functional Head** – refers to the highest-ranking person in the functional department or division, who is reporting directly or next in line to the President and CEO and who is responsible for overseeing and coordinating the activities of their respective department within and outside the Company.
5. **Corporate Human Resources (CHR)** – refers to the Company's Human Resources group that is responsible for recruiting, hiring, and training job applicants as well as handling employee terminations, and compensation and benefits, overseeing the donation process and gifts received from Third Parties, among others.
6. **Corruption** – refers to the misuse of entrusted power for private gain. It is the act of doing something with an intent to give some advantage inconsistent with official duty and the rights of others, a fiduciary or official use of a station or office to procure some benefit either personally or for someone else, contrary to the rights of others. This may be done through the performance of fraud, collusion, embezzlement, money laundering and other deceptive or illegal activities.
7. **Entertainment** – refers to any form of hospitality such as meals for Covered Persons given by Third Parties. It also covers spectator and participative activities (i.e., golf, music, sailing, and other similar activities).
8. **Gift** – refers to a thing, present, sponsorship, or any other personal benefit given by Third Parties to Covered Persons (and vice versa), with whom they transact, whether directly or indirectly, in relation to URC's business and other dealings, and regardless of the place where such gifts are offered to or received by a Covered Person. The following are the types of gifts in this Policy: Money – refers to physical currency, those guaranteed by a bank and treated like cash due to their assured payment, and investments or assets that are convertible to cash (i.e., cash, check, cash equivalents).

    8.1. **Token Gift** – refers to a non-monetary gift of nominal value or valued equal to or below P4,000.

    8.2. **Expensive Gift** – refers to a non-monetary gift with equivalent money value or market price above the nominal threshold at P4,000 in value. This threshold may change from time to time depending on inflation rate and acceptable industry practice.

    8.3. **Perishable Gift** – refers to any food, beverage or flowers that will expire within a month from receipt, or those requiring refrigeration, such as, but not limited to, cakes, pastries and fruits.

    8.4. **Non-perishable Gift** – includes non-food or non-beverage item, as well as any food or beverage that does not fall under the scope of perishable gifts, such as, but not limited to, gift baskets with bottled/preserved food, packed biscuits/cookies, canned goods or liquor.
9. **Immediate Head** – refers to the manager in the Company to whom an Employee directly reports and who exercises control over the work

performance of the latter.

10. **Integrity and Ethics Council (IECON)** – refers to the group composed of Chief Compliance Officer (CCO), Chief Human Resources Officer (CHRO), and Chief Legal Officer (CLO) and Head of Internal Audit, designated by the Company to handle any Conflict of Interest (COI) matter.
11. **IECON Secretariat** – refers to the group designated to assist the IECON in administrative, reportorial, and other functions.
12. **Mandatory Annual Self-Disclosure Activity** – the once-a-year campaign led by IECON and HR, requiring all Directors and Employees to submit a Self-Disclosure Form (SDF) within thirty (30) working days after the end of the calendar year or from the date of the email notification from CHR.
13. **Manual Self-Disclosure Form (MSDF)** – refers to the document manually filled out by a Covered Person as an alternative to the Online Self-Disclosure Form (OSDF) to declare any actual or potential COI by answering guide questions therein and providing other relevant information, used under certain conditions allowed under this Policy.
14. **On-Demand Self-Disclosure or Self Disclosure as Deemed Necessary** – Self-disclosures of conflict of interest that are not covered by the Mandatory Annual Self-Disclosure Activity, or those that are on-demand or to be submitted as the need arises, i.e., disclosures of newly-hired Employees, new Consultants and Agents or Representatives, or each time that a Covered Person is required to, or would like to, disclose new information concerning potential and actual COI, or as deemed necessary by the Chairman, President and CEO, MDs/GMs, and/or other authorized Company officers, such as the Corporate Functional Head, and IECON. Covered Persons shall submit an On-Demand Self-Disclosure Form through the OSDF (as hereunder defined) or MSDF, where applicable or as necessary.
15. **Online Self-Disclosure Form (OSDF)** – refers to the online form accessible to all Covered Persons, who are required to disclose actual or potential COI, The digital and paperless disclosure form is intended to help reduce paper cost and to save time related to data administration, and information retrieval and maintenance.
16. **Relative** – refers to relatives of up to third degree, by consanguinity, affinity or legal adoption, including, Covered Person's spouse, parents, children (and their spouses), siblings (and their spouses), nieces and nephews (limited to children of a brother or sister, and their spouses), grandparents, and aunts and uncles (limited to brothers or sisters of a parent), and domestic partner and his/her relatives of up to third degree, by consanguinity, affinity or legal adoption.
17. **Sponsored Travel** – refers to any travel, accommodation and/or attendance/participation in conferences, conventions, seminars, trainings, international or domestic, whether for personal or business purposes, the costs of which are fully or partially paid for by Third Parties.
18. **Third Party** – refers to any individual or organization and/or their

representative who has potential, existing and/or intended business dealings with the Company, that a Covered Person may encounter during the course of an official business, including, but not limited to, the following:

18.1. **Business Partner** – refers to private non-governmental entities, persons and/or their representatives, with whom the Company does or intends to do business directly or indirectly, including suppliers, contractors, customers and dealers.

18.2. **Customer** – refers to an individual or entity that avails products and/or services, or support from URC.

18.3. **Government Office** – refers to any government entity, including any department, agency, or instrumentality of a government entity, government-owned or government-controlled entities.

18.4. **Government Official** – refers to public officials and employees or any person working at or on behalf of a government office as defined above.

18.5. **Supplier or Contractor** – refers to a third-party stakeholder who receives payment for the sale of goods or performance of service to URC, including their agents or representatives, and subcontractors.

18.6. **Another Covered Person** – refers to any person who may also be a Covered Person as defined herein, who would fall under the conditions described in this section.

GENERAL POLICY

1. URC does not tolerate any form of bribery or corruption.
2. Covered Persons shall observe caution in giving to or receiving GEST from Third Parties.
3. All Covered Persons as well as the Third Parties shall be responsible for the prevention, detection and reporting of bribery offenses and other forms of corruption, and are required to avoid any activity that may lead to a breach of this Policy.

ACTS OF BRIBERY AND CORRUPTION

4. The direct or indirect offer, payment, solicitation and/or acceptance of bribes in any form by a Covered Person from a Third Party, and vice-versa, is prohibited.
5. The following shall be considered as prohibited acts of bribery and corruption:

5.1. Directly or indirectly seeking, accepting, offering or giving any payment, fee, loan, service or gift from or to Covered Persons or Third Parties intended to influence judgment or create a feeling of obligation or as a condition or result of doing business with URC;

5.2. Expediting a routine procedure or performing official function for personal gain (e.g. accepting of kickbacks);

5.3. Neglecting to perform official function or avoiding to perform standard procedure in exchange of receiving gifts; and

5.4. Engaging in any activity that might lead to a breach of this Policy.

6. The following scenarios may indicate possible existence of corruption while dealing with Third Parties, particularly Suppliers and Contractors, thus, concerned groups are advised that the following shall be monitored:

6.1. Use of a product or dealing with Suppliers with previous record of poor quality or performance;

6.2. Transactions with unaccredited Suppliers;

6.3. Acceptance of inadequate or incomplete documents to support recommendation for Supplier accreditation or awarding of project;

6.4. Unexplained or unreasonable preference for certain Suppliers or Contractors; and

7. Invitation from a Third Party for a private meeting hoping to tender for contracts.

Common Threats

8. The following common threats shall be evaluated:

8.1. Covered Persons have personal relationships with Third Party/ies;

8.2. Requests for payment from a Third Party involve, using "cash" or bank account not under the name of the Third Party or its owner's authorized representatives;

8.3. Government Offices, which the Company does business with (e.g. getting permits; filing a document for regulatory compliance; etc.) recommend or insist on the use of a particular Supplier;

8.4. Third Parties insist on unusual transacting procedures, refuse to identify its owners or request to falsify information; and

8.5. Third Parties do not have qualifications adequate to perform the required services.

Reporting

9. Covered Persons shall immediately report any known bribery or corruption to their Immediate Head, Functional Head, a representative of CHR, IECON Secretariat or IECON, or through the different methods stated in the Whistleblowing Policy.

10. Immediate Heads, Functional Heads and the IECON Secretariat who received reports for bribery or corruption shall endorse the same to the IECON who shall monitor, investigate and resolve complaints received.

11. The procedures provided in the existing Whistleblowing Policy for reporting of incidents shall apply in each instance of reported bribery and corruption. A copy of the Whistleblowing Policy can be found on the URC website at https://www.urc.com.ph/corporate-governance/company-policies.

12. Covered Persons are enjoined to cooperate with any investigation in relation to this Policy.

GIFT-RECEIVING GUIDELINES

13. General Rule: Solicitation or acceptance of Gifts by a Covered Person from a Third Party, directly or indirectly, shall not be allowed.

14. Exception:

    14.1. Token Gifts voluntarily given during seminars, conferences, conventions (provided that, the other attendees, speakers, facilitators and/or reactors are also given similar Token Gifts of appreciation by said Third Parties), or those given on any special occasion, i.e., Christmas, birthdays, work anniversaries;

    14.2. Raffle tickets (or prizes won from such raffle tickets or games of chance) and other promotional items, regardless of the value, given to Covered Persons for attending certain events (including but not be limited to athletic or social events, or Christmas parties and the like), conferences or product presentations of Third Parties; Provided, that the other participants are likewise entitled to such raffle tickets/prizes and given equal opportunity to win prizes;

    14.3. Courtesy discounts given to Covered Persons by Third Parties due to personal purchases of products and services of Third Parties; Provided, that such discounted purchases are made openly and the same terms are made available to other buyers or customers;

    14.4. Gifts authorized by the Chairman of the Board (for Directors) or the President and CEO (for Covered Persons other than Directors), as recommended by the IECON; and

    14.5. Personal Gifts received from Relatives, friends, co-workers, and colleagues or entities within the Gokongwei Group, as long as it is not given in relation to any transaction with the Company.

15. Acceptance of Gifts or donations for the Company's Corporate Social Responsibility (CSR) programs or initiatives may be allowed and shall be coursed through the CHR.

16. Solicitation of Gifts from Third Parties for authorized Company activities may be allowed, subject to approval of the CHR Head and endorsement by the relevant Functional Head, where applicable.

17. Gifts offered or given by Third Parties shall be handled in the following manner:

Type of Gift	Disposition
1. Money (Cash, check, or cash equivalents of any amount)	Shall be politely refused and/or returned to the Third Party; However, if not possible to return due to the surrounding circumstances of how the Gift was given, Gift must be turned over to CHR for inclusion in a Company raffle
2. Token Gift	May be kept by recipient
3. Expensive Gift	Shall be politely refused and/or returned to the Third Party; However, if not possible due to the nature of

	the Gift or surrounding circumstances of how the Gift was given, see guidelines below for Perishable and Non-Perishable Gifts:
a. Perishable Gift	Shall be shared and consumed among the Functional/team to which the recipient belongs (NOTE: If Perishable Gift is bundled with Non-Perishable goods, rules on handling of Perishable Gift will apply.)
b. Non-perishable Gift	Shall be turned over to CHR for inclusion in a Company raffle

ENTERTAINMENT GUIDELINES

18. General Rule: Covered Persons shall not accept Entertainment or any form of hospitality from Third Parties, including:

    18.1. The use of property belonging to Third Parties, their employees, agents and/or representatives, including but not limited to, vehicles, beach houses, resorts and vacation houses whether for their personal benefit or Company purpose;

    18.2. Sponsorship for non-Company-supported initiatives, and/or personal events such as birthdays, weddings, baptisms, etc.

19. Exception: Covered Persons may accept the following forms of Entertainment offered by Third Parties as long as they exercise their best judgment in assessing the propriety of accepting said Entertainment and adhere to the conditions below:

    19.1. Meals during business meetings may be accepted; Provided, that the business meals are within the bounds of good taste and valid business purpose, not excessive in scale, expense or frequency, not against any law or known business practice, and that the meeting takes place in a location that meets accepted standards of propriety and is appropriate for business purposes.

    19.2. Invitations to theater, concerts or social/sporting events, and other similar activities, are allowed; Provided, that such invitations are generally available to others within the same community, category, or industry, and provided further, that the frequency of attendance and benefit to the Company are always taken into account.

20. The following questions may serve as guidelines for determining whether an Entertainment is acceptable:

    20.1. Is it related to the conduct of business?

    20.2. Would I feel comfortable telling others about this Entertainment? How would it appear to other employees or individuals outside the Company?

    20.3. Do I feel obligated to reciprocate or grant special favors as a result of

this Entertainment or am I attempting to pressure Third Parties into reciprocating?

20.4. Am I confident that the Entertainment does not violate any law, local or business rules and regulations, this Policy, or any other Company policy or rule?

20.5. Is it contrary to morals or good customs?

20.6. Will it impair my objectivity in the performance of my duties and obligations to the Company?

SPONSORED TRAVEL GUIDELINES

21. General Rule: Acceptance of Sponsored Travels from Third Parties shall not be allowed.

22. Exception:

22.1. In exceptional and justified cases, Sponsored Travels may be accepted upon recommendation of the IECON and upon written approval of the Chairman of the Board (for Directors) or the President and CEO (for Covered Persons other than Directors);

22.2. The following Sponsored Travels may be allowed even without prior recommendation of the IECON and approval of the Chairman or President and CEO:

22.2.1. If part of an approved/existing contract and are deemed beneficial to the Company;

22.2.2. If required to showcase the actual performance of their products/systems (i.e., Proof of Concept), the purpose of the travel is business-related and provide direct benefit to the Company, and the knowledge to be gained by Covered Persons for the travel would be valuable to the Company's business and is directly related to his/her job function.

This arrangement involves the Company specifically requesting the vendor to prove that the item being offered for testing will meet the Company's requirements. If demonstration procedure needs to be done outside the country, such must be included in the vendor's offer, proposal or quotation to prove the item's applicability or capacity. This may be manifested through the Company-issued Request for Proposal (RFP) and part of the Company's evaluation procedure.

Disclosure Mechanism

23. GEST accepted by Directors and Employees, including Gifts turned over by Covered Persons to CHR, shall form part of the Mandatory Annual Self-Disclosure Activity and shall be disclosed in the Online Self-Disclosure Form (OSDF) or Manual Self-Disclosure Form (MSDF), as applicable. The Directors and Employees shall accomplish the OSDF or MSDF within thirty (30) working days after the end of the calendar year or from the date of the email notification from CHR. Engaged Personnel who accepted GEST or turned over Gifts to CHR, may likewise disclose the same through the On-Demand SDF.

24. GEST received by the Covered Person after accomplishing the Mandatory

Annual Self-Disclosure Activity, if required to be disclosed under this Policy, shall be disclosed via On-Demand Self-Disclosure within fifteen (15) days from receipt.

25. Procedures for the Mandatory Annual Self-Disclosure Activity and the On-Demand Self-Disclosure are found in the Conflict of Interest Policy, a copy of which may be found on URC website at: https://www.urc.com.ph/corporate-governance/company-policies

26. GEST solicited or accepted by Relatives from Third Parties, regardless of circumstance, shall also be disclosed upon knowledge or discovery as provided above, and handled in accordance with the Conflict-of-Interest Policy.

GIFT-GIVING GUIDELINES

27. Giving of Gifts (including Entertainment and Sponsored Travel) to Government Offices/Officials and Business Partners (collectively referred to as "Third Parties") for or on behalf of the Company may be allowed as long as it adheres to the Company's Donation Policy and other applicable Company policies, and the following conditions are met:

    27.1. For Government Offices/Officials:

    27.1.1. The Government Office/Official is not prohibited by Applicable Laws from soliciting or receiving any gifts;

    27.1.2. The Gift is not a bribe*;*

    27.1.3. The Gift is for a public, legitimate and/or valid purpose; and/or

    27.1.4. Government-prescribed limits on the value of such gifts or tokens of nominal or insignificant value, offered as a customary gesture or token of gratitude or friendship, and allowed in accordance with Section 14 of Republic Act No. 3019 and Sections 3(c) and 7(d) of Republic Act No. 6713, are observed.

    27.2. *For Business Partners*:

    27.2.1. Gifts to be given are appropriate for the occasion, reasonable, and not frequent or extravagant, so as not to suggest improper or corrupt intent;

    27.2.2. The Gift is not a bribe; and

    27.2.3. The recipient Third Party's own rules and policies regarding gifts, including the recipient's gift threshold amount, must be respected. In absence thereof, the Company's own guidelines on receiving gifts shall apply.

IMPLEMENTATION AND SAFEGUARDS

28. Business Unit Managing Directors, General Managers and Corporate Functional Heads shall have full authority in the implementation of this Policy within their group. The measures shall be proportionate to the risks associated with their areas of responsibilities but may include:

28.1. Ensuring that Covered Persons are aware of this Policy;

28.2. Ensuring that Covered Persons participate in the anti-bribery and anti-corruption trainings;

28.3. Implementing or maintaining internal controls that may ensure ways to detect and prevent any attempts of bribery and corruption, as well as to promote a culture of integrity within their groups.

29. Groups involved in dealing with Third Parties shall prepare and maintain documents and records (e.g. business proposals, expense report, quotations, etc.) relating to such dealings with strict accuracy and completeness. These documents and records shall be kept secured and available for inspection or future audit.

30. Sufficient due diligence shall be conducted to ensure compliance with this Policy.

INQUIRIES/ GUIDANCE

31. For inquiries or guidance regarding this Policy, and in case of doubt about whether the Gift offered by or given to a Third Party is permitted under this Policy, or if it could potentially violate Applicable Laws or Company Policies, the Covered Person concerned should consult the IECON or IECON Secretariat at feedback@urc.com.ph.

POLICY VIOLATION

This Policy shall be considered as part of the Company's Code of Discipline, and is considered as the Company's official orders and/or instructions, and part of established protocols. Any violation of this Policy shall be dealt with in accordance with the appropriate provision/s of the Company's Code of Business Conduct and Ethics, Code of Discipline, and Offenses Subject to Disciplinary Action (OSDA). Penalties may include suspension, dismissal and/or reimbursement for any financial or goodwill loss or damages incurred by the Company as a result of the violation, and/or any other penalties allowed by policy, law and regulation. Any penalty imposed by URC shall not prejudice any legal action or case which may be filed against the erring Covered Person or Third Party.

AWARENESS AND EDUCATION

Trainings on this Policy shall be conducted by the Company. This Policy, along with other Corporate Governance Policies of URC, shall likewise form part of the onboarding materials for new Directors, newly hired employees, including other concerned Covered Persons as appropriate, to promote greater awareness of this Policy's objectives, as necessary.

Other forms of information campaign shall be conducted periodically in order to raise awareness among all concerned personnel, which includes keeping the Policy available in the Company website and regular email reminders.

BUSINESS UNITS' REFERENCE

This Policy establishes a global policy framework and serves as a primary reference for all Business Units (BUs). International markets, in particular, are encouraged to translate and adapt this guideline into their local language to ensure it is clearly understood and compliant with regional laws and cultural norms, pending approval from their authorized signatories.

REFERENCE	This Policy shall be read and implemented in conjunction with all other relevant Company policies to ensure consistency and alignment: • Conflict of Interest Policy, • Code of Business Conduct and Ethics Policy • Insider Trading Policy, • Corporate Disclosure Policy, • Whistleblowing Policy, • Code of Discipline and Offenses Subject to Disciplinary Action (OSDA), among others.
APPENDICES	APP. 01 – Responsibilities APP. 02 – Applicable Laws Against Bribery and Corruption The appendices attached hereto form integral parts of and are deemed approved with this Policy.
EFFECTIVITY CLAUSE	The Code shall take effect upon approval and shall continue to be in full force unless superseded by provisions of law or adoption of new policies and guidelines. The IECON and Investigation Team shall formulate and finalize their respective internal rules of procedure for acting on matters and endorsements arising from this Policy, without prejudice to responsibility of other units with respect to initiation of disciplinary processes or actions/cases as provided herein. Failure of said units to finalize said rules of procedure shall not suspend the effectivity of this Policy.

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1. **CODE OF CONDUCT AND ETHICAL STANDARDS FOR PUBLIC OFFICIALS AND EMPLOYEES (Republic Act No. 6713, s. 1989)**

Prohibited Acts and Transactions. – xxx Solicitation or acceptance of gifts. - Public officials and employees shall not solicit or accept, directly or indirectly, any gift, gratuity, favor, entertainment, loan or anything of monetary value from any person in the course of their official duties or in connection with any operation being regulated by, or any transaction which may be affected by the functions of their office. (Sec. 7)

Definition of Terms. – xxx "Gift" refers to a thing or a right to dispose of gratuitously, or any act or liberality, in favor of another who accepts it, and shall include a simulated sale or an ostensibly onerous disposition thereof xxx. (Sec. 3)

Penalties. – xxx Private individuals who participate in conspiracy as co-principals, accomplices or accessories, with public officials or employees, in violation of this Act, shall be subject to the same penal liabilities as the public officials or employees and shall be tried jointly with them. (Sec. 11)

Exception: - Unsolicited gift of nominal or insignificant value not given in anticipation of, or in exchange for, a favor from a public official or employee. (Sec. 3)

2. **ANTI-GRAFT AND CORRUPT PRACTICES ACT (Republic Act No. 3019, as amended, s. 1960)**

Corrupt practices of public officers (Sec. 3). xxx The following shall constitute corrupt practices of any public officer and are hereby declared to be unlawful: xxx

(b) Directly or indirectly requesting or receiving any gift, present, share, percentage, or benefit, for himself or for any other person, in connection with any contract or transaction between the Government and any other part, wherein the public officer in his official capacity has to intervene under the law.

(c) Directly or indirectly requesting or receiving any gift, present or other pecuniary or material benefit, for himself or for another, from any person for whom the public officer, in any manner or capacity, has secured or obtained, or will secure or obtain, any Government permit or license, in consideration for the help given or to be given, without prejudice to Section thirteen of this Act.

(d) Accepting or having any member of his family accept employment in a private enterprise which has pending official business with him during the pendency thereof or within one year after its termination. Xxx

The person giving the gift, present, share, percentage or benefit referred to in subparagraphs (b) and (c); or offering or giving to the public officer the employment mentioned in subparagraph (d); xxx shall, together with the offending public officer, be punished xxx.

Prohibition on private individuals (Sec. 4):

(a) It is unlawful for any person to take advantage of family or close personal relation with a public official, by requesting for a gift, or gain benefit or undue advantage from any other person having business or transaction with the government in which said official has to intervene.

(b) It is unlawful for any person knowingly to induce or cause any public official to commit any of the offenses defined in Section 3 hereof.

Exception. Unsolicited gifts or presents of small or insignificant value offered or given as a mere ordinary token of gratitude or friendship according to local customs or usage, shall be excepted from the provisions of this Act. (Sec. 14)

3. REVISED PENAL CODE (Republic Act No. 3815, as amended, s. 1930)

Direct bribery. — Any public officer who shall agree to perform an act constituting a crime, in connection with the performance of his official duties, in consideration of any offer, promise, gift or present received by such officer, personally or through the mediation of another shall be liable for direct bribery.

Penalty is also imposed if the gift was accepted by the officer in consideration of the execution of an act which does not constitute a crime; if the said act shall not have been accomplished; or if the object for which the gift was received or promised was to make the public officer refrain from doing something which it was his official duty to do. (Art. 210)

Indirect bribery. — Any public officer who shall accept gifts offered to him by reason of his office shall be liable for indirect bribery. (Art. 211)

Corruption of public officials. — The same penalties imposed upon the officer corrupted, except those of disqualification and suspension, shall be imposed upon any person who shall have made the offers or promises or given the gifts or presents as described in the preceding articles. (Art. 212)

4. **REVISED CORPORATION CODE (Republic Act No. 11232, s. 2019)**

Acting as Intermediaries for Graft and Corrupt Practices; Penalties. – A corporation used for fraud, or for committing or concealing graft and corrupt practices as defined under pertinent statutes, shall be liable for a fine ranging from One hundred thousand pesos (P100,000.00) to Five million pesos (P5,000,000.00).xxx (Sec. 166)

Engaging Intermediaries for Graft and Corrupt Practices; Penalties. – A corporation that appoints an intermediary who engages in graft and corrupt practices for the corporation's benefit or interest shall be punished with a fine ranging from One hundred thousand pesos (P100,000.00) to One million pesos (P1,000,000.00). (Sec. 167)

Tolerating Graft and Corrupt Practices; Penalties. – A director, trustee, or officer who knowingly fails to sanction, report, or file the appropriate action with proper agencies, allows or tolerates the graft and corrupt practices or fraudulent acts committed by a corporation's directors, trustees, officers, or employees shall be punished with a fine ranging from Five hundred thousand pesos (P500,000.00) to One million pesos (P1,000,000.00). (Sec. 168)

5. **EASE OF DOING BUSINESS AND EFFICIENT GOVERNMENT SERVICE DELIVERY ACT OF 2018 (Republic Act No. 11032, s. 2018)**

Violations and Persons Liable. – Any person who performs or cause the performance of the following acts shall be liable:

"(h) Fixing and/or collusion with fixers in consideration of economic and/or other gain or advantage." (Sec. 21)

- *Fixer* – any individual whether or not officially involved in the operation of a government office or agency who has access to people working therein, and whether or not in collusion with them,

facilitates speedy completion of transactions for pecuniary gain or any other advantage or consideration [Sec. 4 (e)]

6. PRESIDENTIAL DECREE ON GIVING GIFTS TO PUBLIC OFFICERS (Presidential Decree No. 46, s. 1972)

Presidential Decree No. 46 "makes it punishable for any public official or employee, whether of the national or local governments, to receive, directly or indirectly, and for private persons to give, or offer to give, any gift, present or other valuable thing on any occasion, including Christmas, when such gift, present or other valuable thing is given by reason of his official position, regardless of whether or not the same is for past favor or favors or the giver hopes or expects to receive a favor or better treatment in the future from the public official or employee concerned in the discharge of his official functions. Included within the prohibition is the throwing of parties or entertainments in honor of the official or employee or his immediate relatives."