

POLICY STATEMENT	Robinsons Retail Holdings, Inc. (“RRHI”, the “Company”) is committed to conducting business with integrity compliant with all applicable laws and regulations of the Philippines. The Company takes a strict stance against corruption and recognizes that it is a threat to its reputation, operations, sustainability, and success.
OBJECTIVE	This “Anti-Corruption Policy” provides general guidelines and expectations for preventing and addressing corruption in all its forms, including bribery, extortion, and money laundering.
SCOPE AND COVERAGE	This policy shall apply to all employees and officers of RRHI and its subsidiaries and affiliates, covering all business activities and transactions. The Company shall endeavor to encourage its suppliers, partners, and other stakeholders to likewise adopt this policy. This policy shall complement the Company’s other existing policies including, but not limited to, the Code of Business Conduct and Ethics, the Conflict of Interest Policy, the Whistleblower Policy, the Material Related Party Transactions Policy, and the Supplier Accreditation Policy.
GENERAL POLICIES	
<i>Prohibited Conduct</i>	1. The Company prohibits all forms of corruption including bribery, extortion, and money laundering. Employees are not allowed to offer, promise, give, demand, or accept anything as a condition for a favorable consideration or undue advantage for themselves or for others.
<i>Due Diligence</i>	2. The Company shall conduct due diligence on third parties including business partners, vendors and suppliers, and service providers to ensure that they comply with this policy, other related policies, and applicable anti-corruption laws.
<i>Gifts and Hospitality</i>	3. Employees are allowed to offer and receive reasonable and appropriate gifts and hospitality as provided for in the Company’s Code of Business Conduct and Ethics. However, employees must avoid at all costs any actions that could be perceived as corrupt or unethical.
<i>Reporting Violations</i>	4. Employees are encouraged to report any suspected violations of this policy to their immediate supervisor, or their Business Unit HR representative, or through the Robinsons Ethics Hotline. The Company shall take prompt and appropriate action to address any reported violations.
<i>Training and Awareness</i>	5. The Company shall provide regular training and awareness sessions for all employees on anti-corruption laws and best practices.
<i>Whistleblower Protection</i>	6. The Company shall protect whistleblowers from retaliation and maintain their confidentiality to the extent possible, as provided for in its Whistleblower Policy.
<i>Compliance Monitoring</i>	7. The Company shall monitor and assess compliance with this policy and relevant anti-corruption laws on a regular basis.
EFFECTIVITY	This policy shall take effect upon approval and shall continue to be in force unless superseded by new policies and guidelines.