

MANUAL TITLE
HUMAN RESOURCES MANAGEMENT SYSTEMS MANUAL

DOCUMENT NO.
HRMSM- ____

DOCUMENT NAME

WHISTLEBLOWING POLICY

REVISION NO.

EFFECTIVITY DATE

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1. OBJECTIVES

- 1.1. To set down the Company's policy on employees who report illegal or wrongful acts committed in the course of or in relation to the business operations of the Company.
- 1.2. To establish guidelines and procedures on such reporting of illegal or wrongful acts.

2. SCOPE

This policy shall apply to all employees of the Company, whether regular, probationary, project or directly hired casual.

3. GUIDELINES

For the purposes of this policy, an incident is reportable if the misconduct by a person (or persons) connected with the Company, which, in the view of the whistleblower acting in good faith, is:

- Misappropriation of company's funds, including premiums collected;
- Receiving kickbacks/money in return for favors from intermediaries, suppliers, consultants, amongst others;
- Giving kickbacks/money to employees of clients, contractors, vendors, etc. in return for business contracts awarded;
- Fraudulently disposing assets of company without proper authorization, including salvage disposals;
- Colluding with others to cheat the company;
- Forging documents or signatures, including those of clients, intermediaries or staff;
- Engaging in illegal activities (including illegal drug use, threatened violence against another person);
- Unethical conduct (including sexual harassment); and
- Any other conduct which may be detrimental to the interests of the Company.

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Role of The Management Committee

- Support and actively promote the reporting of all actual or suspected cases of inappropriate activity
- Provide the necessary support for employees or others who make such valid reports, whether they are subsequently proven true or not; and
- Ensure that the whistleblowing process is effectively implemented which acts as an effective deterrent to cases of inappropriate activity.

Role of the Human Resources Department

- Review and update the Whistleblowing Policy annually, or following a material change to the governance structure of the company's operations and carry out regular refresher training to all employees on the whistleblowing process outlined in this policy.

Role and Duty of All Employees

- Adhere to the Company's rules and regulations;
- Have a due responsibility to protect business assets, including information, goodwill and physical property;
- Be vigilant for any unusual signs and patterns which may suggest that inappropriate activity is taking place;
- Undertake regular refresher training conducted by the ERM team, and be familiar with the entire whistleblowing process;
- Adhere to the whistleblowing process set out in this Policy when reporting any cases of inappropriate activity.

Basis of Whistle blowing

All employees have the duty and obligation to report while undertaking duties pertaining to their role. Employees who come across an incident which they believe is either illegal or contrary to Company's guidelines, including the rules and regulations can report such an incident to management.

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All reports or complaints should be made in good faith and with the reasonable belief that inappropriate activity has occurred or may occur in the future.

If the complaint is found to have been made maliciously or in bad faith, the employee who made the report will face appropriate disciplinary action from the Company. This is to avoid any undue injustice to any individual person.

Whistleblowing procedures

All employees are required to report actual or suspected cases of inappropriate activity to their respective Department Heads, who will then prepare an incident report for submission to the Management Committee.

In the case where the employee's Department Head is suspected to be involved in the inappropriate activity itself, the employee shall make a direct report to the President & CEO, who will then prepare an incident report in consultation with him or her for submission to the Board of Directors.

The incident report should include full details of the alleged conduct and any relevant documents.

Anonymous Reporting

Employees may also submit a report or complaint anonymously if they so choose through:

- a) Head of HR Department
- b) Head of Risk Management
- c) Executive Officers
- d) Board of Directors

All reports or complaints should be marked "Confidential" or "Private" where possible and should contain as much factual information and of information of personal knowledge as much as practical to avoid any mere speculation and guessing.

The anonymous report or complaint should include at a minimum the details of the parties involved, dates or period, the type of concern and evidence substantiating the complaint, where possible.

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Escalation and Investigation Procedures

Upon the receipt of an incident report, an investigation will be undertaken. The investigation could be handled by designated persons depending on the case in question as follows:

The key roles and responsibilities of the personnel involved in the investigation procedure are stated below.

- Conduct a proper investigation of the alleged reportable misconduct.
- Handle all related documentation confidentially, taking care not to divulge sensitive information inappropriately.
- Observe the law of natural justice to ensure a fair and reasonable determination of conduct and parties involved in the incident.
- Maintain a file on the incident report with the relevant details and outcome of the investigations.

Confidentiality and Protection of Whistleblower

The protection of any employee making a whistleblowing report will be treated in the **strictest confidence** and be dealt with expeditiously in a sensible and sensitive manner.

With the Policy Statement above, no personal disadvantage will occur to any employee who reports an inappropriate activity in which they themselves are not a participant of.

The term "disadvantage" here refers to the dismissal, demotion, discrimination, harassment, or prejudice of the employee. It also includes any threats of any such conduct directly or indirectly, to the employee or any member of the employee's family.

If the employee has any concerns about his or her treatment because of making the report or complaint, he or she should contact the Head of HR, the Management Committee or the Board of Directors.

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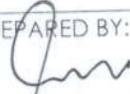


4. EFFECTIVITY

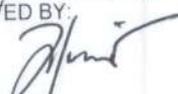
This policy shall be effective immediately upon approval and shall remain in force unless otherwise changed, modified or altered.

This Whistleblowing Policy was approved on December 1, 2020.

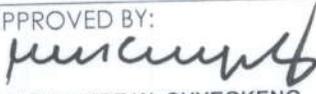
PREPARED BY:


RINA C. SABENORIO
HR & Admin Manager

NOTED BY:


MANUEL R. DEL ROSARIO
Head, Human Resources

APPROVED BY:


IAN PHILIPPE W. CUYEGKENG
EVP & COO


ROSARIO W. CUYEGKENG
President & CEO