

## **Whistleblowing Policy and Form**

### **1.0 Objectives**

- 1.1 To encourage employees and other stakeholders to raise serious and sensitive concerns that could have adverse impact on operations and performance of the business which due to its nature cannot be reported through the normal reporting line
- 1.2 To provide the policies and procedures to ensure such concerns are treated seriously in an appropriate and confidential process
- 1.3 To reassure that any person raising a serious concern in good faith will be protected from reprisals or retaliation

### **2.0 Scope**

- 2.1 The policy covers situations that deal with fraudulent activity, malpractice or wrongdoing that materially affects the Company, its employees, its clients, its suppliers, its contractors/sub-contractors, its business partners or public interest.
- 2.2 The policy does not include complaints or personal grievances which should be pursued through the line managers (e.g., breach of individual employment rights, bullying or seeking justice for themselves).
- 2.3 This policy applies to everyone who carries work within the Company, including:
  - Board of Directors;
  - Executive Officers;
  - All employees (managerial and rank-and-file);
  - Contractors and sub-contractors;
  - Agency staff;
  - Consultants; and
  - Trainees

### **3.0 Definition of Terms**

- 3.1 Whistleblowing – the confidential disclosure by an employee of a concern encountered in the workplace relating to a perceived risk, fraud, malpractice or wrongdoing
- 3.2 Whistleblower – the individual who raises concern about a perceived risk, fraud, malpractice or wrongdoing within the workplace

### **4.0 General Policies**

- 4.1 The company considers wrongdoing to include:
  - General malpractice, such as immoral, illegal or unethical conduct;
  - Failure to comply to the Company's existing policies;
  - Health and safety risks, including risks to the public as well as other employees; or
  - Actions which are unprofessional, inappropriate or in conflict with a general understanding of what is right and wrong.
- 4.2 Whistleblower is encouraged to present supporting evidence for the allegations. Concerns shall be raised at the earliest opportunity.

4.3 The identity of the whistleblower as well as his/her statement shall be treated as confidential to ensure that the whistleblower will be protected at all stages. However, concerns raised by individuals who refuse to reveal their identity or wish to remain as anonymous shall be considered unfounded and will not be processed, if the testimony of the whistleblower is the only evidence of the perceived risk, fraud, malpractice or wrongdoing.

4.4 Whistleblower shall be protected from victimization and harassment. If determined that the whistleblower is an accessory to the incident, disciplinary actions would still be applied, but such whistleblowing act may be considered as a mitigating factor, on a case to case basis.

## 5.0 Procedures

### 5.1 Raising the Concern

Concerns may be raised through the Compliance Officer, except when the Compliance Officer is involved, in which case the matter shall be elevated to the Governance Committee.

The whistleblower may send their concern thru a **drop box**, where letters are sealed, located at the employee entrance, to be checked regularly by the Compliance Officer.

If the whistleblower has reported to the Compliance Officer but no feedback given within one (1) week, he/she may ask assistance thru the Legal Department.

### 5.2 Handling the Concern

The Compliance Officer will be the one responsible in handling issues arising from whistleblowing and be guided by the disciplinary procedures as stated in employees' handbook.

Disclosures made by whistleblower shall be investigated fully (including interviews with witnesses) to carefully consider all relevant matters. The Compliance Officer may consult the senior management or engage the services of the Internal Auditor/s or Legal Department in the investigation and analysis of the complaint or concerns raised.

### 5.3 Progress of the Investigation

The whistleblower will be kept informed of progress and the outcome of the investigation, within the constraints of maintaining confidentiality and/or observing legal restrictions.

### 5.4 Disciplinary Actions

The following actions may be taken after investigation of the concern:

- Disciplinary action in accordance with the employees' handbook against the wrongdoer depending on the results of the investigation; or
- Disciplinary action in accordance with the employees' handbook against the whistleblower if the claim is found to be malicious or otherwise in bad faith; or
- No action if the allegation proves unfounded.

## WHISTLEBLOWING FORM

Name/Whistleblower (*Pangalan*): \_\_\_\_\_

Designation/Department (*Posisyon/Departamento*): \_\_\_\_\_

Contact numbers (*Numero ng Telepono*): \_\_\_\_\_

E-mail address: \_\_\_\_\_

**I. Nature of Perceived Risk, Fraud, Malpractice or Wrongdoing (*Uri ng Pagkakamaling Ginawa*)**

**II. Name of the Person Suspected of the Perceived Risk, Fraud, Malpractice or Wrongdoing (*Pangalan ng Pinaghihinalang Gumawa ng Kamalian*)**

**III. Statement of Facts (*Paglalahad ng mga Pangyayari*)**

(List the events in chronological order / *Isulat ang mga pangyayari ayon sa pagkakasunud-sunod*)

1.

2.

3.

4.

5.

**IV. Recommendation/s (*Mungkahi*)**

(Optional / *Opsyonal*)

**V. Sworn Statement (*Sinumpaang Salaysay*)**

I hereby declare that the above statements are true and correct to the best of my knowledge and belief, and do not include personal grievances or complaints against the person suspected.

(*Ako ay sumusumpa na ang aking mga salaysay ay totoo at tama sa abot ng aking mga nalalaman at paniniwala, at walang halong pansariling hinanakit o reklamo laban sa taong pinaghihinalaan.*)

\_\_\_\_\_  
Signature over Printed Name

(*Pangalan at Lagda*)

\_\_\_\_\_  
Date

(*Petsa*)

Enclosures: Supporting Documents

(*Nakapaloob: Mga mahahalagang dokumento o katunayan*)