

POLICY NO. - Gen-005
EFFECTIVITY DATE - Aug 2017

ORIGINAL POLICY NO. - NEW
ORIGINAL ISSUE DATE - NEW

LAST AMENDMENT DATE - NEW
PROCEDURE FLOW NO. - NONE

POLICY TITLE: WHISTLE BLOWER

POLICY STATEMENT:

This Policy is designed to enable members of the company to raise serious and sensitive concerns that could have an adverse impact on the operations and performance of the business. These concerns are raised internally at a high level which allows members to disclose information which the member believes shows malpractice or impropriety. This policy is intended to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to the invocation of other procedures e.g. disciplinary. These concerns could include:

- Financial malpractice (accounting manipulation, misappropriation of assets or fraudulent statements) or impropriety or fraud
- Bribery (conflicts of interest, sponsorships and donations, gifts or facilitation of payments)
- Violation of competition laws (price fixing, exchange of price sensitive information, collusion with competitors)
- Dangers to Health & Safety or the environment
- Criminal activity
- Improper conduct or unethical behavior
- Attempts to conceal any of these

POLICY GUIDELINES:

I. Protection

This policy is designed to offer protection to members of the company who disclose such serious and sensitive concerns provided the disclosure is made:

- in good faith
- in the reasonable belief of the member making the disclosure that it tends to show malpractice or impropriety and if they make the disclosure to an appropriate person (see below). It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to use the procedure. In an extreme case malicious or wild allegations could give rise to legal action on the part of the persons complained about.

II. Confidentiality

The company will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

III. Anonymous Allegations

This Policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the company.

In exercising this discretion, the factors to be taken into account will include:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources

IV. False/Untrue Allegations

If a member makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that member. In making a disclosure the member should exercise due care to ensure the accuracy of the information. If, however, a member makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that member.

V. Reporting and Investigation

Each complaint or concern will be received by the FIAd Head. The FIAd Head shall (i) record all reported complaints or concerns, (ii) consider the seriousness and credibility of the complaint or concern raised and (iii) proceed accordingly in determining the appropriate action. Some complaints or concerns may be resolved without requiring investigation.

The FIAd Head will consult with the Audit Committee (which is composed of the Legl Head and OODr) and any senior members of the management to assist in the investigation and analysis of the results thereof. The conclusions of the investigation shall be submitted to the President. In case the investigation shows any violation of this policy, appropriate remedial action will be taken.

IMPLEMENTATION:

1. The FIAd Head is responsible for the strict and proper implementation of this Policy.

REPEALING CLAUSE:

1. Any policy, procedure, rules or regulations, or instructions, or part thereof, inconsistent with this Policy are hereby repealed, amended or modified accordingly.

AMENDMENT:

1. This Policy may be amended/canceled at any time. Any amendment to/cancelation of this policy must be in writing and duly approved by the President

EFFECTIVITY:

1. This policy takes effect ten (10) days after approval by the President.

POLICY WRITTEN BY:



JOGIE B. DANGAYO

APPROVED BY:



ELMER Z. ACANCE
President

Guidance on Information Required when Raising a Concern under the Whistle Blowing Policy and Procedure

Checklist

To assist us in assessing or investigating your concerns, it would be helpful if you could be clear as possible with the details. As a minimum we need to understand the following;

- Date(s) of Incident(s)
- Type of incident
- Description incident(s)/ details of concerns
- Where did it happen?
- Who has been involved?
- If possible, explain how you think the matter may be best resolved or start thinking about it in preparation for any meetings you may be required to attend (if you have shared your identity)

If you feel comfortable sharing your identity the please provide us with your name, your work location and contact details