	Division	Version No 1	Policy No
		Revision Date	Effectivity Date
	Department/Section	Initiated By	Approved By
Page No. 1 of 3	Process Name WHISTLEBLOWER POLICY		

I. Purpose

The Company adopts this WHISTLEBLOWER POLICY (the “Policy”) to encourage directors, officers, and employees, and all suppliers, business partners, contractors and sub-contractors to come forward and raise serious concerns about a perceived wrongdoing, malpractice or a risk involving the Company.

II. Scope

This Policy provides a formal mechanism and an avenue for directors, officers, employees, suppliers, business partners, contractors and sub-contractors and other third parties to raise such concerns. This Policy provides an assurance that a person who will raise a concern (the “Whistleblower”) will be protected from reprisals, harassment or disciplinary action or victimization for whistleblowing.


III. General Policies and Guidelines

1. Types of Concern Covered – Concerns that may be raised under this Policy are as follows:

- a. Corrupt practices involving the Company;
- b. Misuse or misappropriation of Company’s assets;
- c. Fraudulent reporting or accounting practice;
- d. Insider trading;
- e. Violation of the Securities Regulation Code;
- f. Violation of the Manual of Corporate Governance;
- g. Conflict of interest situation;
- h. Any conduct that poses a serious risk to public safety, health, or the environment;
- i. Any unethical or illegal conduct; or
- j. Any other conduct similar or related to the foregoing.

2. Protection from Retaliation:

The Whistleblower shall be protected from reprisals, harassment or disciplinary action or victimization as a result of any disclosure or raising of a concern or relaying of information (the “Report”) where such disclosure is made in good faith believing the disclosure to be true and is not made maliciously or for personal gain. Hereafter, the disclosure or raising of a concern or relaying of information, as well as the concern raised or disclosed or the information provided, is hereafter referred to as the “Report”.

	Division	Version No 1	Policy No
		Revision Date	Effectivity Date
	Department/Section	Initiated By	Approved By
Page No. 2 of 3	Process Name WHISTLEBLOWER POLICY		

Any harassment or retaliatory action shall be subject to disciplinary or legal action pursuant to relevant policies and procedures of the Company, as well as any applicable laws.

3. Confidentiality:

All Reports shall be treated in confidence and the identity of the Whistleblower will not be disclosed if the Whistleblower so prefers, unless the Whistleblower will be required to stand as a witness in court. The Company is not accountable for maintaining anonymity where the Whistleblower has told others of the Report or the subject concern.

4. Anonymous Allegations:

Concerns reported anonymously will be investigated appropriately subject to the gravity and credibility of the concern raised and the probability of validating the concern from reliable sources.


IV. Procedures

1. The Whistleblower may send or communicate a Report through the following channels:

Reporting Channel	
E-mail	Whistleblower@_____
Mail	Office of the Compliance Officer 9 th Floor, Ortigas Building Ortigas Avenue, Pasig City 1605 Philippines
Telephone	(+63) 02 6311231
Fax	(+63) 02 6316517
Face-to-Face meetings	Any member of the Audit Committee or the Internal Audit Department

2. Investigation:

If an employee or officer is the subject of a Report, the Report shall be endorsed to the Audit Committee for evaluation. If it is determined by the Audit Committee that an investigation is warranted, the Audit Committee through the Internal Audit Department shall discreetly conduct a fact-finding investigation. Upon determination by the Internal Audit Department that there is a reasonable ground to believe that the employee or officer (the "Respondent") is committing or has committed the concern reported or disclosed, the Committee shall endorse its findings to the Company's Human Resources Department. A formal administrative investigation shall then be

	Division	Version No 1	Policy No
		Revision Date	Effectivity Date
	Department/Section	Initiated By	Approved By
Page No. 3 of 3	Process Name WHISTLEBLOWER POLICY		

conducted by the Human Resources Department in accordance with the Company's Human Resources Manual of Policies and Procedures.

If a personnel of the Human Resources Department, or a member of the Internal Audit Department or the Board of Directors or the Audit Committee is the subject of a Report, the Audit Committee shall endorse the Report to the Company's Head of the Legal Department for appropriate action.

If a supplier, business partner, contractor or sub-contractor is the subject of a Report, the existing policies of the Company shall apply.

3. False Report:

Should it be determined by the Audit Committee that a Whistleblower knowingly (a) submitted a Report containing false allegations or (b) presented fabricated evidence, the Whistleblower shall be subject to disciplinary or legal action pursuant to the policies and procedures of the Company, and any applicable laws.

4. Implementing Rules:

The Audit Committee shall provide for the Implementing Rules of this Policy, subject to the approval of the Company's Board of Directors.

5. Dissemination of the Policy and its Implementing Rules:

The Human resources Department shall be responsible for the public dissemination of this Policy. Where necessary, the Human Resources Department shall arrange the training of the members of the Audit Committee and other persons who will be involved in the implementation of this Policy.

V. Effectivity

This policy shall take effect on the date indicated above and shall supersede any and all previous practices contrary to the provisions herein. It shall remain in full force and effect until amended in writing with the approval of authorized signatories.