

## **WHISTLE-BLOWING POLICY**

### Policy Statement

The Company is committed to detecting and correcting any fraud, misappropriation, discrimination, sexual harassment, illegal acts and other wrongful conduct (collectively “Wrongful Conduct”). The Company has policies addressing certain Wrongful Conduct and each designate the means by which employees can report violations of these policies. This particular policy establishes a reporting mechanism for employees who become aware of Wrongful Conduct committed by employees and former employees.

### Coverage

This policy applies to locally hired, full-time employees of the Company and its subsidiaries. It is the responsibility of all employees to follow the policies and procedures described herein. The Human Resources Department is responsible for ensuring that employees understand and accept this policy, and for fairly and consistently applying the same.

### Definition

This specific policy pertains to “whistle-blowing”, which refers to the disclosure by covered employees who have personal knowledge of Wrongful Conduct by employees at the Company.

### Guidelines

1. Mechanism. The Company shall designate a dedicated e-mail address for employees to freely communicate any Wrongful Conduct committed by employees while working at the Company. The reporting employee may report the Wrongful Conduct anonymously. This reporting mechanism is in addition to the existing system of reporting to a supervisor, a manager at a higher level, or in the Office of the Chairman, or others as specified in the individual policies.
2. Confidentiality. Allegations of Wrongful Conduct will be taken seriously, and the Human Resources Department will direct the conduct of the investigation of such allegations. Reports will be kept confidential to the greatest extent possible, consistent with the need to conduct an investigation. The identity of the individual making the allegation will 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.
3. Wrongful Conduct to be Reported. Reporting must be made in good faith. This policy is not intended to be a mechanism to communicate grievances against other employees of the Company, unless such grievance is a Wrongful Conduct under existing policy.
  - (a) Violations of existing policies and any other unlawful or questionable actions may be reported through the dedicated whistle-blowing e-mail address on the matters such as, but not limited to:
    - (i) Loss and fraudulent act or suspected fraudulent act;
    - (ii) Criminal activity;
    - (iii) Discrimination and sexual harassment;

- (iv) Violation of the code of conduct and accountability;
- (v) Acceptance of gifts or other inducements;
- (vi) Conflict of interest;
- (vii) Ill treatment of a customer/client;
- (viii) Dangerous act affecting health and safety;
- (ix) Act causing damage to the environment;
- (x) Breach of standing financial instructions;
- (xi) Showing undue favor to a vendor or client or to a job applicant; or
- (xii) Information on any of the above that has been, is being, or is likely to be concealed.

(b) This list is not exclusive and is merely a guide.

(c) It should be emphasized that this policy is intended to assist employees who reasonably believe that they have personally witnessed any of the foregoing violations. It is not designated to question financial or business decisions taken by management, and it should not be used to reconsider the decision on any matter that had already been rendered under the formal disciplinary and grievance procedures. Once the whistleblowing procedures are in place, it is reasonable to expect employees to use them rather than air their complaints outside the Company.

4. **No Harassment of Whistle-blower.** No employee who, in good faith, reports a violation will suffer harassment, retaliation or bullying. The Company will not tolerate any harassment or victimization in whatever form or manner of a whistle-blower and will treat such harassment as a serious disciplinary offense, which will be dealt with under the Company's existing disciplinary rules and regulations.
5. **Untrue Allegations.** If an employee makes an allegation in good faith, which allegation was proven to be false by subsequent investigation, no action will be taken against such employee. In making a disclosure, the employee should exercise due care to ensure veracity of the information. If, however, an employee makes malicious allegations or retaliations, disciplinary action may be taken against that individual.
6. **Sanction.** The Human Resources Department will be primarily responsible for imposing the sanction to employees who have been found guilty of violating this policy. The appropriate sanction shall be based on the Company's Code of Conduct.
7. **Amendment and/or Termination.** At any time, and at its sole discretion, the Company may amend, modify, suspend or completely withdraw this policy, in whole or in part.
8. **Approvals.** All approvals for any amendment to this policy are vested with the President upon the recommendation by the Human Resources, Internal Audit and Legal Departments.

#### Effectivity

This policy supersedes any and previous policy directives concerning whistle-blowing and is effective 7 November 2014.

#### End of Policy