



## WHISTLE BLOWING POLICY

### I. INTRODUCTION

The Company is committed to achieving and maintaining a culture of openness, honesty, and accountability. Employees and agents at all levels are expected to conduct themselves with integrity, impartiality and honesty. It is every employee's responsibility and in all interest of the Company to ensure that any inappropriate behavior or action that compromises the interest of the shareholders, investors, customers and the wider public does not occur. It is also critical to maintain a good corporate image and raise the standard of corporate governance of the Company.

To support this, the Company has established this Whistle Blowing Policy (the "Policy").

### II. OBJECTIVES

The objectives of formulating the Policy are as follows:

- (1) Provide the employees of the Company with secure reporting channels and guidance on whistleblowing
- (2) Encourage employees to raise serious concerns internally, in a responsible and effective manner. However,

### III. DEFINITION OF TERMS

The term "whistleblowing" refers to a situation where an employee reports to the Company serious concerns about any suspected misconduct, malpractice, irregularity or illegality which they have become aware of or genuinely suspects that the Company has been or may become involved in. The reportable acts under this Policy shall include, but not limited to, the following:

- Activity against Clients; agent misconduct
- Bribery, corruption or kickbacks
- Conflict of interest
- Discrimination
- Diversity, equity and inclusion issues
- Fair treatment of client concerns
- Harassment
- Harm to people (including human trafficking, forced labour or child labour) or property
- Improper gifts or gratuities
- Insider trading
- Intimidation and retaliation (whistleblower protection)
- Manipulation or falsification of data
- Misuse of assets (IT, information, property)

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- Fraud, malpractice, or irregularities in finance, audit, or internal controls
- Violations of laws, regulations, or Company policies
- Unethical conduct or behavior that could damage the Company's reputation
- Health, safety, or environmental risks
- Criminal acts or breaches of civil law
- Any attempt to conceal the above

#### IV. PROCEDURES

##### A. HOW TO REPORT CONCERNS

###### 1. Reporting Channel

Employees with legitimate concerns should report directly to the Corporate Governance Committee through the Compliance Officer. Reports may be submitted in writing using the Whistleblower Report Form and sent in a sealed envelope marked "Strictly Private and Confidential – to be opened by Addressee Only" to: **Chairman, Corporate Governance Committee 10<sup>th</sup> Floor, STI Holdings Center, 6764 Ayala Avenue** or via secure email to **EthicsComm@philplans.com.ph** (attachments must be password-protected).

###### 2. Report Format and Supporting Documentation

The report or complaint shall be filed by emailing the same to [insert email address] narrating all relevant facts and attaching all supporting evidence of the reportable acts. While the Company does not expect the employee to have absolute proof or evidence of the misconduct, malpractice or irregularity reported, the report should show reasons for the concerns and full disclosure of any relevant details and supporting documentation.

Reports can be made anonymously. However, providing the reporter's identity may help in conducting a thorough investigation.

##### B. PROTECTION OF WHISTLEBLOWERS

Whistleblowers will not be subject to retaliation, harassment, or any adverse employment consequence as a result of making a report in good faith.

Any act of retaliation should be reported and will be treated as a serious disciplinary offense.

##### C. INVESTIGATION PROCESS

1. Each report will be handled based on its nature and seriousness. The Company will acknowledge the report and review it.
2. The whistleblower will be advised whether or not the matter is to be investigated further and give an estimate of how long it will take to provide a final response or action.

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3. Depending on the circumstances, the Corporate Governance Committee may consider nominating an appropriate investigating officer or create a special committee to investigate the matter independently.

#### **D. PROTECTION AND CONFIDENTIALITY**

All reports will be treated confidentially. Employees who report in good faith are protected from retaliation, including dismissal, or disciplinary action, even if concerns are not proven.

Retaliation against whistleblowers will lead to disciplinary action.

#### **E. FALSE OR MALICIOUS REPORTS**

Reports made in bad faith or for personal gain or revenge may result in disciplinary action, including possible dismissal, and liability for any damage caused.

#### **E RECORD KEEPING**

All reports and investigations will be documented and kept securely for up to six years or as required by law.

#### **F. APPROVAL, IMPLEMENTATION, AND REVIEW OF POLICY**


This Policy has been approved and adopted by the Board of the Company. The Corporate Governance Committee has overall responsibility for implementation, monitoring and periodic review of this Policy. In addition, the Audit and Risk Oversight Committee has delegated the day-to-day responsibility for administration of the Policy to the Chairman of the Corporate Governance Committee.

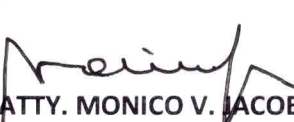
  
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**ATTY. CRISTE GIESEL MISALANG**  
 Corporate Legal Counsel  
 Group Legal & Compliance Officer

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 President & CEO

  
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 Vice-Chairman

  
**JOSEPH AUGUSTIN L. TANCO**  
 Chairman

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Shri Gauri Singh

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