



# **SBS PHILIPPINES CORPORATION**

## **Whistleblowing Policy**

This Whistleblowing policy is adopted to provide for a mechanism where genuine issues and concerns of serious wrongdoing, improprieties or risks in the conduct of the business of the Company may be raised in a confidential manner. This Policy aims to deter and uncover corrupt, illegal, unethical, fraudulent and other conduct detrimental to the interests of the Company

If an employee in good faith believes that a serious wrongdoing or impropriety exists in the workplace, this should be reported immediately to his/her service line manager. If there are reservations to raise the matter through service line managers, the concern may be raised either to the Compliance Officer or any of the Independent Directors by submitting an incident report. Subject to the gravity and credibility of the concern raised and the probability of validating the concern from reliable sources, the matter will be investigated by Company.

Identities of employees who have raised concerns will be held in confidence unless otherwise agreed. This policy protects employees from victimisation, harassment or disciplinary action as a result of any disclosure of impropriety where the disclosure is made in good faith and is not made maliciously or for personal gain. However, this assurance will not extend to someone that maliciously raises a matter that is known to be untrue. Anyone who knowingly submits a false report or have fabricated evidence shall be subject to disciplinary and/or legal action.

This policy is intended to assist individuals who believe they have discovered wrongdoing or impropriety in the conduct of the business of the Company. It is not designed to address concerns relating to employment matters which can be properly raised through the grievance procedure.

### *Adoption and Effectivity*

*This Whistleblowing Policy was adopted by the Board of Directors of the Corporation on 10 November 2015 with immediate effect.*