



C O N C E P C I O N

**POLICY ON WHISTLEBLOWING**



## TABLE OF CONTENTS

1. PURPOSE / OBJECTIVE .....	3
2. SCOPE.....	3
3. DEFINITION OF TERMS.....	3
4. POLICY PROVISIONS.....	4



**1. PURPOSE/OBJECTIVE**

Concepcion Industrial Corporation (“Company” of “CIC”) is committed to the highest standards of corporate ethics and legal compliance. To this end, the Company is adopting this Policy to encourage all stakeholders of the Company to make good faith reports of actual or suspected impropriety, fraud, misconduct, abuse, health and safety concerns, conflicts of interest and any other wrongdoing, free from fear or retaliation.

**2. SCOPE**

This Policy applies to all directors, officers, employees regardless of employment status, and third parties that include contractors, agents and suppliers that deals with the Company or any of its subsidiaries or affiliates (CIC Subsidiary).

It is the intention of the Board of Directors of the Company to require the adoption and implementation of a similar policy by each CIC Subsidiary and their respective subsidiaries, and the presidents of each CIC Subsidiary shall recommend the adoption of this Policy or a similar policy to their respective boards of directors.

**3. DEFINITION OF TERMS**

“*CG Rules*” means the Corporate Governance Manual, Code of Ethics, Conflict of Interest Policy, Policy on Business Gifts, other Company policies and applicable laws, rules and regulations related to corporate governance as may be issued from time to time by the Company or any governmental or regulatory body having jurisdiction.

“*Discipline Policy*” refers to the policy that establishes the standards of professional conduct of CIC employees and sets the guidelines and procedures for employee discipline.

“*Ethics Committee*” means the committee composed of the President & Chief Executive Officer, the Chief Finance Officer, the Chief Human Resources Officer, and the Ethics and Compliance Officer.

“*Report*” means any disclosure or exposure of a suspected or actual impropriety, misconduct, dishonesty, health and safety concern, fraudulent or unethical act, or any conflict of interest.



## POLICY ON WHISTLEBLOWING

“*Retaliation*” pertains to an act of reprisal, discrimination, harassment, intimidation or adverse personnel action by Company directors, officers, executives, supervisors, or employees against a Whistleblower.

“*Whistleblower*” means any person who in good faith discloses or reports an actual or suspected misconduct involving the Company.

### 4. POLICY PROVISIONS

#### 4.1 Confidentiality

All Reports, including the identity of the Whistleblower and person named in the Report as well as any investigations conducted pursuant to a Report shall be treated in a confidential manner and will not be disclosed unless necessary to comply with requirements under the law.

#### 4.2 Anonymous Reporting

Reports made anonymously must contain sufficient details to establish the fact of the complaint and the persons involved. It will be investigated appropriately subject to the gravity of concerns raised, the credibility of the disclosure, and the likelihood of validating the concerns from other sources.

#### 4.3 Reporting Channels

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

Website/Dialog	<a href="http://grantthorntonsolutions.ph">ProActive Hotline (grantthorntonsolutions.ph)</a>
Face-to-Face	Ethics and Compliance Officer
Email	<a href="mailto:celeste.lambo@cic.ph">celeste.lambo@cic.ph</a> <a href="mailto:legalandgovernance@cbsi.ph">legalandgovernance@cbsi.ph</a>
Telephone	(0998) 968 – 3529

#### 4.4 Investigation

The Report shall be endorsed to the Ethics Committee of the Division or Subsidiary concerned for evaluation. If it is determined by the Ethics Committee that an investigation is warranted, the Ethics Committee through the Ethics Officer shall discreetly conduct a fact-finding investigation. Upon



## POLICY ON WHISTLEBLOWING

determination by the Ethics Officer that there is reasonable ground to believe that the employee or officer (the “Respondent”) is committing or has committed the concern reported or disclosed, the Ethics Committee shall endorse its findings to the Company’s Human Resources Group (HR) if it involves a violation of the Discipline Policy or the Head of Legal, Compliance and Governance if it involves a violation of the CG Rules. A formal administrative investigation shall then be conducted by the HR or Legal in accordance with the Company’s Policies and Procedures.

If a personnel of HR or a member of the Board of Directors is the subject of a Report, the Report shall be handled by the Ethics Committee for appropriate action. If a member of the Ethics Committee is the subject of a Report, the Ethics Committee shall endorse the Report to the Board of Directors 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.

### 4.5 Good Faith Reports

Any Report made in good faith is fully protected by this Policy, even if after investigation the Report is not substantiated. Anyone filing a Report must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a possible irregularity.

### 4.6 False Reports

Should it be determined by the Ethics Committee that a known 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.

### 4.7 Non-Retaliation

The Whistleblower will be protected from Retaliation as a result of any Report made in good faith believing the disclosure to be true and is not made maliciously or for personal gain. Any Retaliation shall be subject to disciplinary or legal action pursuant to relevant policies and procedures of the Company, and any applicable laws. Any Whistleblower who believes he or she is being retaliated against must contact the Ethics Officer or the Head of Legal, Compliance and Governance immediately.