



Whistleblowing

POLICY



Whistleblowing Policy

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Table of Contents

1. Purpose.....	3
2. Scope	3
3. Covered Concerns	4
4. Definitions.....	5
5. Policy Statements.....	6
5.1. Obligation to Report	6
5.2. Reporting Process	7
5.4. Protection from Retaliation or Harassment.....	8
5.5. Rights of a Whistleblower	8
5.6. Rights of an Investigative Subject.....	9
6. False Reports	9
7. Reporting Channels	9
8. Investigation of Disclosures	10
9. Activity Service Level Agreements	12
10. Programs.....	13
11. Roles and Responsibilities	14
12. Related document references.....	16
13. Compliance	17

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Whistleblowing Policy

Document No.: POL-SARC-QRMS-1011

Version. No. 2.0

Page 3 of 18

1. Purpose

Converge Information and Communications Technology Solutions Inc., as well as its subsidiaries **Metroworks ICT Construction Inc.** and **Pentagon Holding Co. Inc.**, and its affiliates collectively referred to herein as “Company” is committed to operate with the highest standards of ethical behavior as a publicly listed company. The Company encourages its officers, employees, consultants, suppliers, service providers, subscribers, and all concerned stakeholders to act with honesty, integrity, transparency, and accountability.

This whistleblowing policy aims to empower the Company’s stakeholders to speak up, without fear of retaliation, about any facts or events, whether from internal or external sources, related to fraud, illegal activities, dishonesty, unethical, and/or inappropriate behavior, violations of the Code of Conduct and Ethics, Anti-Bribery and Anti-Corrupt Policy and other relevant policies of the Company.

The Policy is not intended to replace existing procedures. It may be more appropriate for a particular concern to be raised by way of another policy or procedure and not under this Whistleblowing Policy. In particular, this policy should not be used for complaints relating to a member of employee’s personal circumstances, such as the way have been treated at work. In those cases, employee shall use the procedure under Employee Discipline Policy (EDP). If any member of employee has any concerns as to which policy the disclosure should be made under, they should check with the HR Department. Further this Policy is not designed to further any personal disputes, question financial or business decisions taken by the Company.

Whenever possible, employees should seek to resolve concerns by reporting issues directly to his/her manager or to the next level of management as needed until matters are satisfactorily resolved. However, if for any reason an employee is not comfortable speaking to a manager or does not believe the issue is being properly addressed, the employee may contact the HR Employee Labor Relation (ELR). If an employee does not believe that these channels of communication can or should be used to express his/her concerns, an employee may proceed to use the whistleblowing channels.

2. Scope

This policy applies to all executives, officers, employees, business partners, and stakeholders of the Company including but not limited to suppliers, service providers, consultants, distributors, shareholders, and investors. This policy likewise applies to subscribers, clients or potential customers and all other stakeholders with vested interest in the company.

The policy covers tipping off information on incidents, situations, problems, and/or issues involving unethical, dishonesty, illegal, or inappropriate behaviors and practices, violations of company policies and/or fraud.

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3. Covered Concerns

Whistleblowing concerns may include, but is not limited to, the following:

1. Misconduct, unethical behavior, or policy violations: Acts that violate moral or civil law, code of ethics, company policies, and/or contractual agreements. Actions that are illegal, unethical, and unbecoming of an employee (Examples: violation to key Company policies listed below, control overrides, acting under false or insufficient authority, abuse of authority, harassment)
 - A. Violation of the Anti-Bribery and Anti-Corruption Policy;
 - B. Violation of the Anti-Money Laundering Policy
 - C. Violation of the Employee Code of Conduct;
 - D. Violation of the Code of Business Ethics;
 - E. Violation of the Company's Manual on Corporate Governance;
 - F. Violation of the Company's Data Privacy and Information Security Policies
 - G. Violation of the Securities Regulation Code;
 - H. Violation of the Company's Insider Trading Policy;
 - I. Violation of the Company's Related Party Transactions Policy;
 - J. Violation of the Company's Conflict of Interest Policy
2. Theft, fraud, or misappropriation: Fraudulent appropriation of funds or property entrusted to one's care but owned by the employer or someone else (Examples: stealing, misappropriation of funds, false representation)
3. Falsification of documents: Counterfeiting, forging, falsifying, or making fraudulent changes to any document (Forgery, alterations, tampering)
4. Financial reporting concerns: Deliberate misstatements in recording and/or business transactions or result of operations. (Example: incorrect recording of financial transactions, irregularities in application of accounting standards, misleading reports)
5. Actions that bring risk to public safety, health, or the environment

4. Definitions

Term	Definition
Anonymity	The quality or state of being anonymous or describes situations where the acting person's identity is unknown.
CGDP Group	Corporate Governance and Data Privacy Group
Disclosure	Any disclosed report involving unethical behavior or actions in violation of the Company's policies. Such disclosure can be in the form of an anonymous tip or a formal written complaint, wherein the latter then becomes a Protected Disclosure (as defined below) when: (i) information becomes verified by the HR ELR and Investigation Team; and (ii) whistleblower discloses and verifies his/her identity.
HRBP	HR Business Partner
HR ELR	HR Employee and Labor Relations
Investigation Team	Refers to identified qualified and impartial Company employees tasked to conduct all necessary investigative proceedings, including interviews, hearings, and resolutions. The investigating team has the primary responsibility of ensuring that fairness and due process is observed and that sanctions for policy violations are well imposed.
Investigative Subject	Refers to person/s being the subject of a whistleblowing report who are the focus of any investigation. The investigative subject has the responsibility of cooperating with any investigation until a resolution has been passed, providing any and all documents or resources relevant to his/her case.
Level 1	<p>May include the first point of contact who will receive the incident report. This may be either of the following:</p> <ul style="list-style-type: none"> Supervisor/Manager – if a team member or officer participates in the reported incident Department Head – if the supervisor or manager participates in the reported incident HR – if the Department Head participates in the reported incident <p>The Level 1 shall determine whether a formal investigation is needed or not. In case formal investigation is not needed, the Level 1 is responsible to resolve the incident.</p>
Protected Disclosure	Any disclosure made in writing and in the form of a Sworn Statement or a duly notarized Affidavit. The contents of the sworn statement or affidavit shall be evaluated by the HR ELR and/or the Investigation Team, and if found to have merit, shall be treated as Protected Disclosure.
Retaliation	Refers to any act of revenge or backlash towards a whistleblower, arising from the Whistleblower's reports.

Term	Definition
Whistleblower	Refers to any person who, in good faith, makes a disclosure <i>(as defined above)</i> to the Company
Whistleblowing	Refers to the act of passing on information concerning a wrongdoing or a suspected wrongdoing, such as corruption, sexual harassment etc. This can be referred to as "blowing the whistle", "making a disclosure", "making a whistleblowing report", or otherwise.
Whistleblowing Platform	Refers to an independent system in which a whistleblower can divulge his/her disclosures without fear of retaliation or any adverse effects. This also refers to a system utilized by the Company to generate and tabulate analytics involving whistleblowing reports.

5. Policy Statements

5.1. Obligation to Report

Any person, with knowledge of, or has observed, any of the following critical acts or analogous to the same, may choose to file a primary report to the proper authorities in addition to filing a report through the whistleblowing reporting channels for immediate attention:

- Acts which are illegal or in violation of the law;
- Actual or suspected actions in violation of Company policies, rules, and regulations;
- Abuse or improper exercise of power and privileges;
- Acts that can severely affect the Company's image and/or reputation;
- Acts that may cause a violation of data privacy laws;
- Actual personal data breaches or acts that can trigger personal data breaches;
- Violation of data subject's rights as speculated by Republic Act No. 10173;
- Actions which amount to harassment, or which are unreasonable, unfair, dishonesty, fraudulent, discriminatory, unethical, or unjust;
- Other similar actions that are against the company's best interest or which are opposed to the Company's values; and
- Crimes against persons or properties (i.e., burglary, rape, assault, etc.) should be promptly reported to local authorities.

The same may still be raised to the whistleblowing reporting channels should the wrongdoing within the organization affect the public interest.

5.2. Reporting Process

5.2.1. Reports and disclosures shall be made through the Company's Whistleblowing Platform or through other channels (see 7. Reporting Channels). The Whistleblowing Platform is an independent reporting system in which a whistleblower can divulge his/her disclosures without fear of retaliation or any adverse effects. Reports within the platform will be classified based on the reporting categories defined in the system. It allows reporters or whistleblowers to check on the status of reports through the system-generated report ticket. A notification email will be received by the Corporate Governance and Data Privacy Group and/or HR ELR once a report is submitted.

The report can be generated by the CGDP Group and/or HR ELR for data analysis, investigation, and management reporting. Its features and facilities shall be adequately harmonized with the Company's business objectives. The instructions on how to report and access reports in the Whistleblowing Platform shall be cascaded by the CGDP Group.

5.2.2. The Whistleblower may file his/her disclosure or report anonymously. However, the Company encourages that the Whistleblower disclose his/her identity for the disclosure to become a Protected Disclosure to aid in clarifying and verifying facts of the case before and/or during the conduct of the investigation or fact-finding.

5.2.3. The Whistleblower must always act in good faith. While proof beyond reasonable doubt is not expected, the Whistleblower should be able to demonstrate some reasonable ground or cause of action based on verifiable information, which are required to be substantiated. A clear indication of good faith is when a Whistleblower is willing to make the disclosure a Protected Disclosure, in accordance with the provisions of this policy.

5.2.4. The Whistleblowing Platform's reports, and analysis shall be in line with the current industry best practices/ standards and shall be able to provide seamless service in accordance with Company's business needs.

5.3. Confidentiality and Independence

As mandated by the Corporate Governance Code and the Integrated Annual Corporate Governance Report (IACGR) recommendations for publicly listed companies, the Company's whistleblowing policy and platform forms part of an independent framework that enables stakeholders to freely communicate their concerns about unethical practices, without fear of animosity or retaliation. The platform can be accessed by the Corporate Governance Committee, wherein the majority members of which are composed of Independent Directors. The same platform is likewise accessible by the CGDP Group, working alongside the HR ELR to ensure that an independent whistleblowing framework is being enforced.

The identity of the Whistleblower, as well as the disclosed information, shall always be treated with strict confidentiality regardless of the outcome of the investigation. The Company shall take all necessary steps and make every effort to protect the identity of the whistleblower, unless compelled by law.

The Whistleblowing Platform is equipped with strong cyber security programs and security features in accordance with local and international standards to guard against cyber and data privacy risk. Any personal information disclosed in the Whistleblowing Platform will only be shared to the authorized third-party and to personnel with a need-to-know basis.

The Investigative Subject's identity shall likewise be treated with utmost confidentiality as well as the disclosed information on the case reported by the Whistleblower regardless of if the case is about to be heard, on-going, or decided. All the documents relevant to the case shall be stored in a secured storage that are only accessible by the Investigation Team. The storage utilized by the Investigation Team shall have technical and organizational security measures based on the requirements of the Data Privacy Act of 2012, its Implementing Rules and Regulations, the issuances of the National Privacy Commission and all other applicable privacy laws.

The documents relating to a case shall have a retention period for two (2) years from the time the case has been decided, the case lacks merit, the case has no bearing or was no longer pursued. The documents relating to a case shall be disposed in a secure manner upon reaching its retention period.

5.4. Protection from Retaliation or Harassment

The Company shall protect the Whistleblower, making a disclosure in good faith from any form of retaliation, retribution, harassment, or pressure. The Whistleblower must not be demoted, suspended, terminated, harassed, or even discriminated solely because he/she reported a possible violation with honest intentions.

Anyone who retaliates by posting, uploading, sharing commentary/content that are defamatory, libelous, or commission of acts in any way that constitute harassment, intimidation or cyberbullying of customers, co-employees, partners and alike shall be bestowed with the disciplinary action of dismissal.

5.5. Rights of a Whistleblower

In accordance with the provisions of this policy, a Whistleblower reporting in good faith shall have the following rights:

- Right to be heard promptly and thoroughly and to be taken seriously. The Investigation Team shall operate under the assumption that the report is made in good faith and considered protected activity;
- Right to be informed on the status and progress of their disclosure, barring any informational reservations from the Investigation Team or the HR ELR;
- Right to participate in an investigation or hearing;

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- Right to refuse to follow a directive from the Investigation Team to engage in conduct that employees believe to be unlawful;
- A whistleblower, in making his/her protected disclosures shall incur no breach of his/her duty of confidentiality, in relation to disclosing sensitive and confidential Company information; and
- Right to explain and respond to questions or clarifications set forth by the Investigation Team or the HR ELR.

5.6. Rights of an Investigative Subject

An Investigative Subject has the following rights:

- Right to be informed of the allegations or charges pressed against him/her, in relation to the case details;
- Right to access the complaint and all other documents against him/her;
- Right to respond verbally or in writing to the allegations or charges, as the proceedings so dictate;
- Right to invoke his/her right against self-incrimination. Such invocation will not be taken against him/her but will be carefully considered by the Investigation Team in producing case resolutions and decisions;
- Right to consult with a legal counsel. However, in case of administrative hearings, legal counsels cannot interfere, represent, or pro-actively coach the Investigative Subject. Legal counsels, at best, shall only be allowed to convey and explain to the Investigative Subject, legal matters or actions undertaken by the Investigation Team; and
- Right to erase or block the case filed against the Investigative Subject if the case is deemed lack of merit, no bearing, or was no longer pursued by the Whistleblower.

6. False Reports

In the event that disclosure/s presented to the Investigation Team and HR ELR, are:

- a. willfully fabricated or falsified, to unjustly incriminate an investigative subject;
- b. presented under bad faith: or
- c. false and betrays the trust and confidence of the HR ELR or the Investigation Team

Such false disclosure, whether a protected disclosure, shall be considered null and void, and will warrant the review and re-evaluation of the case report.

A Whistleblower in bad faith who provides false reports to the HR ELR or Investigation Team shall be subject to disciplinary or legal actions pursuant to the policies and procedures of the Company, and any applicable laws.

7. Reporting Channels

Pursuant to the principles and recommendations of the Code of Corporate Governance and the IACGR, an independent whistleblowing platform is hereby established, granting the whistleblower, direct reporting capabilities to at least one independent director, and to ensure that reports are well heard and acted upon.

The Company shall utilize an outsourced Whistleblowing Platform as its primary medium for whistleblowing reports and disclosures. This platform is carefully managed and monitored by an external service provider to maintain independence and confidentiality. Access to the Whistleblowing Platform shall be cascaded by the CGDP Group to the Corporate Governance Committee.

Stakeholders are enjoined to direct their disclosures to the Whistleblowing Platform. Disclosures made through other channels such as Corporate Governance and Data Privacy Group and HR ELR shall still be acknowledged but will be redirected to disclose the same through the platform.

The disclosures can also be reported to any one of the following:

- Face-to-face meetings:
 - The President, Chief Resource Office and/or Chief Operating Officers;
 - Executives, Officers and/or Department Head of the unit concerned;
 - Humans Resources (HR) / HR ELR, and/or the Compliance Officer)
- Email:
 - CGDP Group - cgdp@convergeict.com
 - Compliance - compliance@convergeict.com
 - Data Privacy - privacy@convergeict.com
 - HR - hremployeerelations@convergeict.com
- Other communication channels that may be applicable such as SMS, other social media (e.g., Viber), etc.

8. Investigation of Disclosures

Disclosures shall be processed in accordance with the provisions of the Employee Discipline Policy (EDP) and the Whistleblowing Procedures.

- 8.1. Disclosures received through other channels such as email and face-to-face discussions, Level 1 will determine the severity of the reported incident and check whether a formal investigation is needed.

Level 1 may be either of the following:

- Supervisor/Manager – if a team member or officer participates in the reported incident
- Department Head – if the supervisor or manager participates in the reported incident
- HR – if the Department Head participates in the reported incident

There should be adequate information to determine if the issue should be formally investigated. Additional inquiries may have to be made if additional facts are needed. The credibility of the allegations is important, and a set of questions must be considered. In addition, the risk of the reported incident may be identified using the ERM risk matrix of the Company: low risk to critical risk rating (please refer to the Whistleblowing Procedures for the detailed questions and risk rating).

In case the reported incident is relatively low-risk and can be resolved internally, then Level 1 shall perform an informal investigation and resolve the issue without an Investigating Team. Completion of the IR form is needed and shall be kept by the concerned Department Head.

- 8.2. Disclosures received through the Whistleblowing platform (e.g. If the Department Head is involved with the reported incident, the employee may directly raise the issue for a formal investigation by reporting the wrongdoing using the whistleblowing platform) shall be assessed by the CGDP Group and then evaluated for severity to determine if it would undergo either a formal investigation or informal investigation (same requirement in 8.1).

In case the reported incident is relatively low-risk and can be resolved internally, then the CGDP Group shall communicate with Level 1 to perform an informal investigation and resolve the issue without an Investigating Team. Completion of the IR form is needed and shall be kept by the concerned Department Head.

- 8.3 For 8.1, in case a formal investigation is needed (i.e., Medium to Critical risk incidents) the Level 1 will escalate the incident to the HR ELR by submitting the updated IR form using Smartsheet and/or the whistleblowing platform.
- 8.4 For 8.2, in case a formal investigation is needed, the CGDP Group will escalate the incident to the HR ELR.
- 8.5. Whenever possible and appropriate, the Investigation Team will keep the person making the report, updated with the investigation, disposition and/or resolution of the issue/case.
- 8.6. Resolutions of case investigations shall be reported to the HR ELR for proper post-investigative evaluation or final decision.

To ensure that due process is being observed, the foregoing processes shall be enacted upon receipt of a disclosure report through the reporting channels:

a. **Fact Finding:** All offenses committed by an employee which are covered in the EDP, and other policies shall be investigated expeditiously. Upon receipt of a disclosure, Immediate Head/Complainant shall prepare an Incident Report (IR) or Complaint Letter of any violation of the employee of the provisions of the EDP and other policies and submit said letter to his/her Superior/Immediate Head/Group Head, furnishing a copy of the same to HR (HR ELR and HR Business Partner) within 48 hours from the date and time of commission, omission, or receiving the disclosure.

b. Notice to Explain: If probable cause is established, the Superior/Immediate Head/HR Head shall prepare a Notice to Explain (NTE) addressed to the employee requiring him to give his explanation within five (5) working days from receipt of the NTE as to why no disciplinary action should be imposed on him. To ensure consistency in application and the appropriateness of the charge, NTE must be supported by sworn statements of witnesses and/or official reports, documents, or other supporting papers.

c. Written Explanation: The Employee charged administratively shall have a period of five (5) working days from receipt of the NTE within which to file his/her sworn written explanation and other supporting counter – affidavits/documents. Failure on the part of the Employee to explain within the prescribed period shall be considered as a waiver on his part to submit his/her written explanation. Corresponding sanction shall be imposed for after non-compliance thereto.

d. Administrative Hearing: Upon receipt of Employee’s Explanation Letter, a Notice of Administrative Hearing (NOAH) may be prepared by the Superior/Immediate Head and served to the employee at least three (3) days before the scheduled meeting. Note that Administrative Hearing is not necessary to render a Decision.

The hearing shall be conducted through clarificatory questions propounded by or coursed through the Employee Discipline Committee and shall be limited to issues of facts not clear or ascertainable from the evidence at hand.

e. Decision: The Superior/Immediate Head of the concerned employee, HR COE Leader for Employee and Labor Relations, and a representative from other Groups shall compose the Employee Discipline Panel. This Panel shall be the sole judge to evaluate and decide the case based on the incident/violation report, testimonies of witnesses and other evidence, if any. As a guide, the third chair may be chosen from other Groups, depending on the nature of the charge.

Should the fact-finding team determine a report to merit no further investigation, the case shall be moved to the concluding phase or referred to the concerned department for appropriate resolution

Note: The above due process statements were lifted from the EDP. For exhaustive provisions on the same, please see refer to the actual EDP.

9. Activity Service Level Agreements

9.1. All disclosures will be properly monitored to ensure timely acknowledgment of all reported wrongdoing, the below activity service level agreements will be followed by the HR ELR and CGDP Group:

Step #	Description	SLA
1	Acknowledge Receipt of report of wrongdoing	1 working day
2	Fact Finding	2 working days
3	Determine if formal investigation is needed	
4	Escalate incident for formal investigation	
5	Selection of investigating team	1-2 working days
6	Creation of investigation plan (section 1)	1-2 working days
7	Schedule and conduct interviews	3-4 working days
8	Accomplish Notice to Explain (NTE)	5 working days
9	Request, collection, and review of Documents	3-4 working days
10	Completion of Whistleblower Incident Report (WBIR)	3-4 working days
11	Follow-up investigation (if needed)	2-3 working days



Whistleblowing Policy

Document No.: POL-SARC-QRMS-1011

Version. No. 2.0

Page 13 of 18

Step #	Description	SLA
	Total target number of days to complete the whole investigation process (SLA)	27 working days (follow-up investigation excluded)

9.2. In addition to the SLA, other success indicators shall be properly monitored to ensure whistleblowing process are executed effectively:

- Reported incidents were all addressed, and details of the investigation and resolution are properly documented on a timely manner. Information can be extracted as follows:
 - Whistleblowing Platform – list of incident reports, report category, relationship of the whistleblower to the reported company, summary of attachments submitted, status of reports and date time reported.
- Whistleblower feedback including satisfaction rating with the whistleblowing program and suggestions for improvement, to be requested and reported on an as needed basis
- Success indicators shall be reviewed and updated by the CGDP Group, if necessary

10. Programs

To ensure that the intention of this policy is well enforced throughout the enterprise, the Whistleblower Protection Program and the Anti-Retaliation Program shall be established and enacted. These programs shall serve to grant fair and equal protection to whistleblowers while upholding the company's best interest.

10.1 Whistleblower Protection Program

The Company shall ensure the protection of the whistleblower, particularly in extreme cases where risk of injury, harm, damage to property, or other analogous situations is imminent and reasonably foreseeable.

For this purpose, a Whistleblower Protection Fund (fund) shall be established. This fund shall be used to cover the necessities of the whistleblower, especially when housed in a designated safehouse, until the resolution of the case, or the threat of harm or injury is no longer present.

A Whistleblower safehouse (safehouse) shall be designated to house any known whistleblower within a given period or until the resolution of the case deliberations, or the threat of harm or injury is no longer present. The location of the safehouse shall be known only to the CGDP Group, Security Team, and the management.

The HR ELR is tasked to determine if a case being investigated shall pose any actual harm or threat to the whistleblower, thereby subjecting said whistleblower to this program. The fund and location of the safehouse shall likewise be set by the HR ELR, in coordination with the Security Team, and to be approved by management.

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10.2 Anti-Retaliation Program

The Company shall enact the Anti-Retaliation Program (ARP) under this policy to ensure equality and fairness are always observed in investigative procedures. The ARP envisions to create a workplace in which employees feel comfortable voicing their concerns without fear of retaliation. This program likewise aims to mitigate circumvention of our policies, particularly the abuse on the rights of a whistleblower. The ARP is based on the premise that he/she who comes to report unethical behavior must report in good faith.

A whistleblower, who is guilty of an infraction may be subjected to the ARP, provided that his/her disclosure will serve to be pivotal and necessary for the progression of the investigations. His/her disclosure/s and cooperation shall be accounted for in determining whether the same can be a mitigating factor in terms of conferring the appropriate disciplinary action.

In no case shall the ARP be used to avoid the imposition of a disciplinary action by virtue of being a whistleblower. The HR ELR shall, on a case-to-case basis, determine whether the disclosure of a guilty whistleblower is made in good faith or otherwise.

11. Roles and Responsibilities

11.1 The Corporate Compliance Officer (CCO) shall be the lead figure in overseeing the implementation of and compliance with this policy. The CCO is responsible for:

- Ensuring observance of this policy within the Company;
- Conducting relevant trainings and awareness campaign concerning this policy;
- Participating in HR ELR deliberations in an oversight and consultative function;
- Periodically submitting a report to the President and Board of Directors; and
- Developing and further improving whistleblowing mechanisms of the Company

Accordingly, the roles and responsibilities of parties involved to a whistleblowing investigation are as follows:

11.2 CGDP Group

- Assist the CCO in his/her duties, relative to the implementation of this policy;
- Conduct relevant trainings and awareness campaign concerning this policy;
- Attend HR ELR meetings, as required;
- Direct whistleblowing concerns to the proper department for handling;
- Assist the Investigating Team in providing recommendations from a Compliance standpoint;
- Monitor movement of case investigations until resolution and closure;
- Provide oversight/summative reports to the CCO, on a periodic basis; and
- Accept relevant information to the case reported and evidence presented by the Investigative Subject in its defense.

11.3 Whistleblower

- Provide factual information about his/her disclosures, which includes presentation of evidence, resources, or putting such report into writing to become a protected disclosure;
- Provide reasonable evidence to merit the start of an investigation, even if the report was made anonymously. Absence of such evidentiary support cannot trigger any investigative proceedings; and
- Coordinate with the Investigation Team and the HR ELR and actively participate in all investigative proceedings and deliberations.

11.4 Investigation Team

- Observe fairness in all proceedings and maintain the highest ethical standards of the Company;
- Evaluate disclosures/protected disclosures of the whistleblower/s and whether the same would merit an investigative proceedings;
- Conduct interviews, administrative hearings, and facilitate processing of whistleblowing reports;
- Coordinate with whistleblowers and investigation subjects in securing all necessary documentary evidences and/or responses;
- Monitor movement of case investigations until resolution and closure;
- Ensure the timely resolution of whistleblowing reports, and conduct post-resolution actions;
- Coordinate with the HR ELR by providing reports regarding case investigations, including the collation and turnover of case data and documents; and
- Ensure that all relevant information and evidence presented are dealt with integrity.

11.5 Investigation Subject

- Cooperate with the Investigation Team should he/she be called for hearings, case deliberations, and proceedings;
- Provide the Investigation Team with documents, resources, and responses relevant to the defense of his/her case;
- Conduct him/herself with honesty and integrity regardless of outcome of investigative proceedings; and
- Comply with summons and attend all hearings/deliberations.

11.6 HR ELR

Function as primary oversight for handling whistleblowing reports, verifying, monitoring, and acting on the same until resolved; The oversight responsibilities of the HR ELR include ensuring that due process is being observed and all relevant groups/individuals are informed of the case details and development.

- Safeguard the records of any investigative proceeding and ensure that all data are being stored/disposed in accordance with Data Privacy Rules and Regulations.
- Observe fairness in all proceedings and maintain the highest ethical standards of the Company; and
- Part of the Employee Discipline Panel (Panel), evaluate and decide the case based on the incident/violation report, testimonies of witnesses and other evidence, if any. Providing recommendations to case investigations and provide process improvement initiatives.
- Select the appropriate team to investigate the whistleblowing cases.
- Assist, together with the Superior/Immediate Head concerned, HR Business Partner (HRBP) and representatives from other Groups, whenever needed to convene a Fact-finding Committee to immediately conduct an inquiry to determine the validity of the whistleblowing report and whether there are grounds to lodge an administrative charge

12. Related document references

- Code of Business Ethics
- Employee Code of Conduct and Discipline
- Whistleblowing Procedure
- Employee Discipline Policy
- Code of Corporate Governance – SEC Memorandum Circ. 19 -2016

13. Compliance

Upon approval of the Whistleblowing Policy, Compliance is tasked to immediately disseminate and to enforce this policy company wide. Any support or further guidance on the whistleblowing process may be coursed through cgdp@convergeict.com.

Non-Compliance - An employee found to have violated the provisions of this Whistleblowing Policy may be subject to disciplinary action, up to and including termination of employment. Please refer to the table below as aligned with the Employee Discipline Policy.

OFFENSE/S	PENALTIES		
	1 st	2 nd	3 rd
Non-compliance with Whistleblowing Policy	Minimum 5 days suspension	Warning of Dismissal with minimum 10 days suspension	Dismissal
EMPLOYEE CODE OF CONDUCT AND DISCIPLINE - Threatening, intimidating, coercing, or inducing a fellow employee or officer of the Company to violate Company rules and regulations, or for whatever purpose or reason, within Company premises. <i>*(Prescription period is one year from date of last commission.)</i>	Warning of Dismissal with minimum 5 days suspension	Dismissal	
EMPLOYEE DISCIPLINE POLICY - Posting, uploading, sharing commentary/content that are defamatory, libelous, or commission of acts in any way that constitute harassment, intimidation or cyberbullying of customers, co-employees, partners and alike.	Dismissal		

Note: If the offenders outweigh the offense/s stated on the table above, the offenders should be punished in proportion to the gravity/seriousness of their offenses as aligned in the Employee Discipline Policy, see table below:



Whistleblowing Policy

Document No.: POL-SARC-QRMS-1011

Version. No. 2.0

Page 18 of 18

OFFENSE/S	PENALTIES			
	MINOR	MODERATE	MAJOR	GRAVE
Non-compliance with Whistleblowing Policy				X
EMPLOYEE DISCIPLINE POLICY - Threatening, intimidating, coercing, or inducing a fellow employee or officer of the Company and/or third party to violate Company rules and regulations, or for whatever purpose or reason.		X		
EMPLOYEE DISCIPLINE POLICY - Posting, uploading, sharing commentary/content that are defamatory, libelous, or commission of acts in any way that constitute harassment, intimidation or cyberbullying of customers, co-employees, partners and alike.				X

	MINOR Level 1	MODERATE Level 2	MAJOR Level 3	GRAVE Level 4
1st Offense	Written Reprimand	5 Days Suspension	30 Days Suspension	Dismissal
2nd Offense	5 Days Suspension	15 Days Suspension	Dismissal	
3rd Offense	15 Days Suspension	Dismissal		
4th Offense	Dismissal			

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