

## **WHISTLE BLOWING POLICY**

Philtrust Bank's Whistle Blowing Policy aims to improve the atmosphere of good corporate governance and transparency within the organization. Under the Policy, the Bank encourages its employees, among other stakeholders, to communicate in confidence and without risk of reprisal, possible serious violation of banking laws, rules and regulations, including the Employee Code of Conduct, which may result in reputational or financial harm to the Bank. The matters that may be reported are as follows:

1. Illegal, unethical or questionable activities or transactions;
2. Malpractices or improprieties in financial reporting, internal control, and auditing;
3. Unprofessional and unethical behavior;
4. Material violation of the Employee Code of Conduct, specifically the provisions on conflict of interest and confidentiality of information; and
5. Other acts or omissions that may raise serious concerns in the reputation of the Bank.

### **Reporting and Handling of Whistle Blowing Reports (WBRs)**

The Policy provides an independent system of reporting, receiving, investigating, and addressing legitimate concerns.

WBRs must be signed by the whistle blower and submitted in sealed envelope to the Internal Auditor of the Bank. Reports from anonymous sources shall not be entertained.

WBRs are forwarded to the Audit Committee for an impartial investigation. The Committee shall resolve the complaint either by dismissing it for lack of merit or rendering appropriate judgment based on the evidence received during investigation. The resolution must be comprehensive enough to include the facts of the case, the issues involved, the evidence gathered, and the basis or rationale for the decision rendered. Copy of the resolution shall be forwarded to the Board for its information and implementation.

In case where WBRs involve the Auditing Department or the members of the Audit Committee, reports shall be received by the Office of the President and investigated by the Corporate Governance, Nomination, and Remuneration Committee.