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HUMAN RESOURCE MANUAL

WHISTLEBLOWING POLICY

1. Objective:

- 1.1. To provide channels for any individual to report and testify against any employee for commission of acts which are illegal, unethical, and against company policy and morals.

2. Scope and Limitation:

This policy shall apply to all employees regardless of employment status of the following companies of the Anflo Group, namely:

- 2.1 Anflo Construction Corporation (ANFLOCON)
- 2.2 Anflo Management and Investment Corporation (ANFLOCOR)
- 2.3 Damosa Land Inc. (DLI)
- 2.4 Damosa Workspace Solutions, Inc. (DWSI)
- 2.5 Don Antonio O. Floirendo Sr. Foundation Inc. (AOFF)
- 2.6 Kalayaan Broadcasting System Inc. (KBSI)
- 2.7 Kensington Ventures, Inc. (KVI)
- 2.8 SECURUS Security Agency (SSAI)
- 2.9 Tagum Agricultural Development Company, Inc. - Davao-Based (TADECO – Davao)
- 2.10 United Finance Corporation (Unifinance)


3. Definition of Terms:

- 3.1. Respondent – the person who is the subject of the report filed with the Company pursuant to this Policy;
- 3.2. Whistleblower – a person who reports a Reportable Condition or events to the Corporation through this Policy.
- 3.3. Whistleblowing Report (WR) – a complaint filed by a Whistleblower about a Reportable Condition or events.

4. Reportable Conditions:

Whistleblowers may report to the company such acts that are illegal, unethical, violate good morals, are grossly disadvantageous to the Company, such as but not limited to:

- 4.1. Any provision stated in the company's Employee Code of Discipline
- 4.2. Abuse of Authority
- 4.3. Conflict of Interest
- 4.4. Malversation and/or Misappropriation of company funds
- 4.5. Receiving of Commissions

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WHISTLEBLOWING POLICY

4.6. Solicitation of Gifts from 3rd party individuals and corporations

5. Reporting Channels

Whistleblowers may submit whistleblowing reports through the following reporting channels:

5.1. Face-to-face Meetings with either of the following;

- 5.1.1. Chief Legal Officer;
- 5.1.2. Human Capital Management Manager, or;
- 5.1.3. Recruitment & Separation, and Labor Relations Team Lead
- 5.1.4. Labor Relations Officer;

5.2. Electronic mail (email):

- 5.2.1. nabanga@anflocor.com
- 5.2.2. jsuyo@anflocor.com
- 5.2.3. ggdelacruz@anflocor.com
- 5.2.4. kennard.dominic.sedo@anflocor.com

5.3. Registered Mail: Office of the Human Capital Management Manager, Unit 1601 16th Floor, Damosa Diamond Tower, Damosa IT Park, Brgy. Alfonso Angllongto Sr., Davao City

5.4. Telephone: (082) 235-2144 loc. 339 / (082) 235-2000 loc. 339


6. Handling of Whistleblowing Reports

6.1. All whistleblowing reports received through the reporting channels shall be evaluated and investigated by the Human Capital Management Office (HCMO for brevity).

6.1.1. All whistleblowing reports will be evaluated and investigated by the HCMO which reserves the right to disregard reports that are vague, without merit, or made with malicious intent to tarnish the name and reputation of the person complained of.

6.1.2. In the event that the Whistleblower withdraws his or her report, the investigation shall continue, provided that the evidence gathered is sufficient.

6.1.3. In the event that the respondent resigns prior to the final resolution of the case against him/her, the investigation shall still continue provided that the evidence gathered is sufficient.

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WHISTLEBLOWING POLICY


7. Confidentiality

The HCMO shall ensure that all information from whistleblowing reports, and the identities of the respondents shall be kept confidential, including the identity of the whistleblower, except when the whistleblower authorizes the release of his/her identity.

8. Implementation

The provisions of this policy shall take effect immediately after its approval.

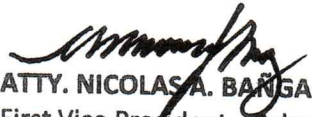
Prepared by:


GERARD MICHAEL JOSEPH G. DELA CRUZ
 Recruitment & Separation, and Labor Relations
 Team Lead
 Date: Dec. 17, 2024

Recommending Approval:


JHEANNE LEE S. JUYO
 Manager - Human Capital Management
 Date: 12/17/24

Approved by:


ATTY. NICOLAS A. BANGA
 First Vice President – Admin. Services Div.
 Date: _____