

**POLICY STATEMENT**

The Company is committed to conduct business according to the highest ethical and legal standards. In line with this commitment, we encourage employees, business partners and other stakeholders to raise concerns or volunteer information involving perceived inappropriate, fraudulent, unethical or illegal actions committed by Company employees or representatives while performing their functions, tasks, duties and responsibilities.

The inappropriate, fraudulent, unethical or illegal actions may involve perceived wrongful action, negligence or misconduct committed by Company employees or representatives in any aspect of Company operations including but not limited to corruption, bribery, kickback, abuse of authority, oppression, conflict of interest in bidding or procurement of supplies, equipment, job orders or construction projects; business dealings and negotiations with investors and business partners and other related activities of the Company; falsification of financial reports and unauthorized payment/s or remittance/s; unauthorized alteration of company contracts, documents, vouchers, receipts, statement of accounts or reports; concealment or cover-up of misconduct, fraud, theft or misuse of company funds, equipment or assets; breach of Company code of conduct and other analogous activities committed either inside or outside Company premises.

**OBJECTIVES**

1. To encourage employees, third party service providers, business partners and other stakeholders to report concerns or matters involving actual or suspected violations of Company policies, its code of conduct, illegal or unlawful acts or omissions, inappropriate behavior, fraudulent, unethical or illegal actions, negligence or misconduct committed by Company employees or representatives.
2. To provide clear procedures and reporting channels for reporting the acts as described in the above-policy statement;
3. To protect the Whistleblower against any form of retaliation, intimidation, harassment or unfair treatment;
4. To ensure that the complaints or reports are properly investigated and addressed.

**SCOPE AND COVERAGE**

1. The policy shall apply to all employees of the Company, consultants, third party service providers, including their employees, on the job trainees, business partners and other stakeholders of the Company, its subsidiaries and affiliates unless they have established their own rules and procedures compliant with the principles and objectives herein stated.
2. The Whistleblowing Policy (WBP) shall include, but is not limited to complaints, reports or disclosure of information as described in the above-policy statement.

**DEFINITION OF TERMS**

1. **Complaint** – refers to the written document, report or statement containing the disclosure or information as described in the above-policy statement as made or submitted by the Whistleblower.
2. **Conflicts of Interest Committee (CICOM)** – refers to the group composed of (1) Office of the Compliance Officer; (2) Human Resources Department; (3) Internal Audit Department (advisory capacity), and (4) Legal Department designated by the Company

to process the received Complaints, conduct or endorse the investigation and to provide a report on the results thereof.

3. **CICOM Chairman** – refers to the Company’s Chief Compliance Officer who shall preside in all meetings of the Committee. The Chairman shall also assist in ensuring compliance of this policy.
4. **CICOM Secretariat** – refers to the group designated by the CICOM tasked to receive, perform preliminary evaluation and endorse the Complaint to the CICOM.
5. **Investigation Team** – refers to the resource group/s designated by the CICOM or Management to further conduct the investigation and to provide a report on the results thereof to the CICOM. Members of the team shall be independent from the Business Unit (BU) where the complaint came from. Members shall also have the technical knowledge to conduct the investigation.
6. **Reporting Channels** – refer to the Company’s designated tool or medium where employees or external partners and/or stakeholders can securely share feedback, submit complaints, and report on non-adherence to company values and policies:
  - 6.1 iEcho – refers to the digital platform accessible via Employee Service Portal (ESS) and Company Website;
  - 6.2 Mail; and
  - 6.3 Email
7. **Respondent** – refers to the employee of the Company, consultants, third party service provider, who is / are the subject of the Complaint.
8. **Retaliation / Retaliatory Acts** - refers to the intimidation, threat, pressure or coercion directed towards or against the Whistleblower and/ or the corroborative witness. It includes, but is not limited to, civil, administrative or criminal proceedings commenced or threatened to be commenced against the Whistleblower and/ or the corroborative witness, such as but not limited to forcing or compelling the Whistleblower and / or the corroborative witness to withdraw the complaint, resign, retire and/or transfer, negative performance appraisals, fault-finding, undue criticism, alienation, blacklisting,, and such other similar acts.
9. **Whistleblower** – refers to an employee, individual, third party service provider, business partner or other stakeholders who in good faith and without malicious intent, discloses, voluntarily reports, or files a complaint against a Company employee. The Whistleblower may or may not be an employee of the Company or of its subsidiaries and affiliates. The Whistleblower in his complaint shall allege any of the circumstances as described in the above-policy statement.

10. **Whistleblowing** - is the act of reporting or disclosing information about wrongdoing, misconduct, unethical behavior within an organization by a person (the Whistleblower) who has access to such information, in any of the circumstances as described in the above-policy statement, usually as an employee, contractor, or stakeholder.

11. **Witness** – refers to an employee, business partner or other stakeholder of the Company or any third party other than a Whistleblower who has personal knowledge of the violation committed and is willing to participate or cooperate in the investigations or proceedings pertaining to a Complaint.

#### GENERAL POLICIES

#### Procedure in Reporting and Evaluation/ Investigation

1. Employees, business partners, other stakeholders or any third party are encouraged to report any actual or suspected irregularity, unethical behavior, misconduct, malpractice, irregularity or a risk via:

- 1.1. iEcho;
- 1.2. Mail; and
- 1.3. E-mail

JSGHI IECON may also forward to APVI CICOM all complaints and reports pertaining to APVI as received in their own whistleblower reporting channel.

2. Qualification of a Whistleblower / witness:

- 2.1. Must have personal knowledge of the wrongdoing or have direct or credible information (not third hand information) about the circumstances as found in the above-mentioned policy;
- 2.2. Must be made with the genuine belief that the information shared is absolutely true and necessary to prevent or correct a wrong doing committed or about to be committed by the Company employee;
- 2.3. Must be acting in good faith and not be motivated to embarrass, defame, retaliate or gain personal advantage against the employee complained of;
- 2.4. The complaint or report should clearly describe the alleged act including the persons involved, date / time, description of the violation and should attach supporting evidence and name/s of witnesses (if available);
- 2.5. Cooperate with the Investigation Team, including making available for examination all necessary records and information; and
- 2.6. Refrain from discussing or disclosing the investigation or their testimony with anyone not connected with the investigation.

3. The Whistleblower/Witness shall:

- 3.1. Provide sufficient information about his/her personal identity and the reasons for making the complaint/disclosure;

- 3.2. Provide corroborating evidence to justify the commencement of the investigation;
- 3.3. Provide truthful information and not act maliciously or make false accusations;
- 3.4. Report in good faith without seeking personal gain, any suspected violations against Company policies, misconduct, malpractice, irregularity or a risk involving the Company that he believes is substantially true;
- 3.5. Cooperate with the Investigation Team, including making available for examination all necessary records and information; and
- 3.6. Refrain from discussing or disclosing the investigation or their testimony with anyone not connected with the investigation.

4. The CICOM Secretariat shall:
  - 4.1. Receive and have access to the Complaint / report;
  - 4.2. Review and assess the Complaint / report if it is credible based on the following criteria:
    - a. verifiable identity (Anonymous tips can be acted upon if credible, but identified whistleblowers carry more evidentiary weight);
    - b. substantial allegations (Complaints or reports must state specific act, individuals involved, dates and evidence (documents, pictures, emails, text messages, screen shots) rather than vague general allegations / accusations);
    - c. *prima facie* case where there must be substance to warrant a formal or fact finding or administrative investigation; and
    - d. good faith on the part of Whistleblower who must act without malice and primarily to expose wrongdoing and not for personal revenge.
  - 4.3. Conduct a preliminary evaluation if the report is valid;
  - 4.4. Report and recommend to the CICOM for their disposition (e.g. investigate, invalidate report, endorse to appropriate group, etc.);
  - 4.5. Oversee the implementation of this policy, monitor and maintain records of the receipt, disposition and resolution of all reports/concerns and preparation of the necessary report for CICOM; and
  - 4.6. Update the whistleblower periodically on the status of the complaint.
5. The Conflicts of Interest Committee (CICOM) shall:
  - 5.1. Convene after the receipt of an endorsement from CICOM Secretariat as described above;
  - 5.2. Utilize the Company's resources from the various groups (e.g. business units, corporate center units, affiliates, subsidiaries, etc.) in investigating the veracity of the report, coordinate with the relevant groups with respect to the conduct of administrative investigations and/or the filing/prosecuting the necessary cases in

relation to said report. The various group resources shall form part of the Investigation Team;

- 5.3. Evaluate, review, approve or disapprove the Investigation Report;
- 5.4. Ensure the appropriate reporting thereof to the Company President and CEO and Audit Committee, as may be necessary; and
- 5.5. Report to JSGHI IECON Secretariat the status, results or resolution for all complaints and reports they have forwarded for investigation.

6. Upon endorsement, the Investigation Team shall:

- 6.1. Proceed to examining and investigating the report/complaint filed;
- 6.2. Coordinate and collaborate with the relevant people/groups needed in conducting the investigation (including coordination with the concerned employee's immediate superior, conduct administrative investigations, etc.);
- 6.3. Arrange for interviews with relevant witnesses or individuals;
- 6.4. Establish the facts, obtain statements and collect evidence;
- 6.5. Maintain records of the investigation process highly confidential and ensure compliance with due process procedures;
- 6.6. Delegate actions and elevate matters as may be necessary, including recommending the conduct of an external investigation or referral to the National Bureau of Investigation (NBI) or the Philippine National Police (PNP) if needed under the circumstances and shall be concurred by the CICOM; and
- 6.7. Submit an Investigation Report on its findings and recommendations to CICOM within a reasonable time set by CICOM and Investigation Team.

7. All investigations shall be conducted in accordance with applicable Company policies and in accordance with the requirements of due process.

8. The Investigation Team shall submit an Investigation Report on its findings and recommendations to CICOM, which in turn shall ensure that the same is reported to the President and to the Audit Committee of the Company. Recommendation may include but is not limited to the following:

- a. Disciplinary action in accordance with Company's human resource department procedure;
- b. Referral or filing of a complaint before the Philippine National Police (PNP), National Bureau of Investigation (NBI), the Office of the City Prosecutor or Municipal / City / Regional Trial Court;
- c. Internal process review or re calibration.

***Non-Retaliation***

9. The Company shall adopt measures that the Whistleblower and/or witness who are employee/s of the Company are protected from any form of retaliation against them.

9.1. Such retaliation or reprisal tactics include but are not limited to:

- a. Termination or dismissal after filing a report;
- b. Supervisor or Peer harassment;
- c. Demotion or removal from key responsibilities;
- d. Denial of promotion or salary increase when already due;
- e. Unjust poor performance evaluations;
- f. Transfer or reassignment to an undesirable post;
- g. Discrimination in availment of Company benefits, trainings, travels etc.
- h. Unwarranted disciplinary measures without valid cause;
- i. Non-renewal of contract (for contractual or project-based workers);
- j. Pressure or harassment from Respondent or other employees:
  - Verbal abuse, threat, bullying or humiliation at work;
  - Being isolated or excluded from meetings or team meetings;
  - Undermining credibility or rumor mongering to discredit the Whistleblower;
  - Filing of counter-complaint;
  - Ostracism by co-workers;
  - Backstabbing;
  - Social media shaming, bullying or bashing

9.2. However, any action which is similar or analogous to any of the foregoing retaliatory acts, which are set forth as penalties in the Company's code of conduct or company policies, rules and regulations, that may be taken by the Company against an employee who is also a Whistleblower or witness shall not be considered retaliation if the Company shows through clear and convincing evidence that the Whistleblower or witness-employee has committed or has been involved in any act that is in violation to the Company's Code of Conduct and other policies, whether it is or in no sense connected with or motivated by the act of whistleblowing. The Company may take a separate disciplinary action against an officer or employee who has engaged in retaliatory conduct in violation of this Policy.

9.3. In the event that the Whistleblower, witness or non-party believes he has been retaliated against in his support to this Policy either as a Whistleblower or witness, he shall report the incident and form of protection/corrective action to CICOM via email to: [apviiecho@altuspropertyventures.com.ph](mailto:apviiecho@altuspropertyventures.com.ph)

9.4. Request for protection from retaliation shall be subject to evaluation and shall be granted once the retaliatory act is proven valid. This shall be endorsed by CICOM for approval of the President and CEO or his designated representative.

***Confidentiality  
and Malicious  
Reporting***

10. All Reports/Complaints, including the identity of the Whistleblower and the witness, including his personal information and circumstances and all the parties involved in the report shall be treated as confidential.

- 10.1. The identity of the Whistleblower shall not be revealed without his consent, unless the Company is otherwise required by law to disclose the information, or if his testimony is required to further investigate or prosecute the matter, or as may be determined by the CICOM.
- 10.2. This Policy shall not apply when, after due investigation, it is found that the Whistleblower intentionally made a false/malicious statement, or that the report

made was frivolous or vexatious or made with ill-intent. In such case the whistleblower may be subjected to sanctions under Company policy, or appropriate law, rule or regulation.

11. The right of the Whistleblower to protection under the Policy against retaliation does not include immunity for any personal liability that maybe later discovered as a result of the investigation. Hence, baseless, simulated, fabricated, false or malicious allegations or reports as may be determined by CICOM or the Investigation Team, shall be dealt with in accordance with pertinent Company code of conduct, policies and rules and/or applicable laws.

12. Whether the withdrawal of the complaint by the Whistleblower was made voluntarily or the result of retaliation against him/her, the investigation shall continue provided that the evidence gathered is sufficient.

***Withdrawal of Complaint*****APPENDICES**

APP.01 Reporting Channels Contact Details  
APP.02 Process Flow

**POLICY VIOLATION**

Any Violation of this policy shall be dealt with in accordance with the appropriate provision of Offenses Subject to Disciplinary Action (OSDA).

**EFFECTIVITY CLAUSE**

This policy shall take effect upon approval and shall continue to be in full force unless superseded by new policies and guidelines.

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