

Document Name & Number

**Whistleblower
PP-ER-0.005**

Process Owner: Employee Relations

Effectivity Date: May 4, 2026

Rev. 03

Page
1 of 8

ISO Standard:

ISO 9001, ISO 27001, ISO 22301 ▾

Information Classification:

Level 1 - Protected ▾

1.0 OBJECTIVE

Encourage Maxicare employees, management, directors or other stakeholders, who have a good reason to believe that any of Maxicare employees, management or directors have acted unethically or violated any law, regulation, or internal policies, to report their concerns.

Investigate the suspected violation or unethical behavior and take appropriate corrective action(s).

Prohibit any retaliatory action against the whistle blower for making a good faith report of a suspected unethical behavior, violation of any law, regulation, or Maxicare’s internal policy by any of its employees, management or directors or other agents authorized to act on its behalf.

Prohibit any retaliatory action against an employee, management, director or other stakeholder who has provided proof or additional information in good faith in connection with an internal investigation following a whistle-blowing report.





Take appropriate action against individuals who engage in retaliatory conduct related to items #3 & 4 above.

2.0 SCOPE

This policy is intended to establish a process by which (a) any person can report a discovered breach of a law, regulation, or code of conduct or rules of Maxicare; (b) when said act or omission is committed by an employee, officer or member of the Board of Directors; (c) where such act or omission would not otherwise have been reported due to fear of retaliation or the sensitivity of the issues or the persons involved.

History of Amendments

Revision No.	Date	Current Summary of Revisions [Change Details, Reason, and Impact]
03	May 4, 2026	1. Full revamp of policy - patterned and enhanced in accordance with JG Summit counterpart policy.

Prepared By:	Reviewed By:	Approved By:	
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Whistleblower	Process Owner: Employee Relations	Effectivity Date: May 4, 2026	Document No: PP-ER-0.005	Rev. 03	Page 2 of 8
---------------	--------------------------------------	----------------------------------	-----------------------------	---------	----------------

3.0 DEFINITION OF TERMS

- 3.1 Whistleblower - concerned individual who, in good faith, reports and provides information, anonymously, if they choose, on matters involving the actions or omissions of persons covered by this Policy which are illegal, unethical, violate good governance principles, against public policy and morals or promote unsound and unhealthy business practices.
- 3.2 Whistleblower Report (WR) - the report made by the whistleblower providing all reasonably obtainable or shareable information on the reportable act or omission.
- 3.3 Integrity and Ethics Council (IEC) - the body exercising oversight of this Policy and responsible for appointing Receiver and Investigator Teams, providing reports and recommendations to the Board and management for resolution of cases generated from WRs, and generally ensuring that the objectives of the Policy are carried out consistently and efficiently.
- 3.4 Receiver Team - the group appointed by the IEC to receive, evaluate and refer WRs that are appropriate for investigation.
- 3.5 Investigator Team - refers to the group appointed by the IEC to conduct investigations on WRs identified by the IEC for further study and verification of facts, pursuant to potential future action.
- 3.6 Witness - any person other than the whistleblower who has knowledge of the acts or events being reported in a WR, and is willing to corroborate the same or provide additional relevant information.
- 3.7 Retaliatory Action - an action intended to cause harm or inconvenience to the whistleblower as a form of revenge or retaliation for submitting a WR, or to intimidate them into withdrawing the WR or otherwise refusing to cooperate further in an investigation. Examples of retaliatory action include discrimination, harassment, intimidation or other events that would cause harm to the whistleblower or a witness.
- 3.8 Special Observer (SO) - an individual or entity outside of the Policy infrastructure who shall be granted access to all WRs as they are submitted, and may provide guidance and instruction to the IEC. The current SOs are Mr. Antonio Go, Mr. Lance Gokongwei, and Lead Independent Director Mr. Eric Cruz.

4.0 RASCI MATRIX

- 4.1 **R** - **Responsible** (the person/s who must ensure that the task is completed/ Doer of the task). At least 1 per task.
- 4.2 **A** - **Accountable** (the person who is ultimately accountable.) It should only be 1 per task.
- 4.3 **S** - **Support** (the person/s who can help/facilitate in the execution of the task).
- 4.4 **C** - **Consult or Approver** (the person/s that needs feedback and contribute to the activity).
- 4.5 **I** - **Inform** (the person/s or groups who must be kept up to date on what is happening in this task).
- 4.6 **R + A**, **A + C** - **Combined** (single role performing multiple functions).

RASCI MATRIX				
Task / Activity	Receiver Team	Investigation Team	Integrity and Ethics Council	Special Observers
Managing of Reporting Channels	R + A		I	I
Validation and Consolidation of Report	R + A		C	

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RASCI MATRIX				
Task / Activity	Receiver Team	Investigation Team	Integrity and Ethics Council	Special Observers
Handling of Whistleblower Program	R	R	A	
Investigation of Cases under Whistleblower Program		R + A	S	I
Resolution of Cases and Recommendations for Action		S	R + A	I
Appointment of Receiver and Investigation Teams			R + A	
Escalation of Case			R + A	I
Case File Repository Management	R + A		I	

Note: May add/remove rows and/or columns as needed.

5.0 GENERAL STATEMENTS

5.1 This Policy aims to provide a facility for any person to raise serious and sensitive concerns involving violations of company policies, its Code of Business Conduct and Ethics (the “Code”), unlawful or criminal acts, and any other act or omission that would endanger the health and safety of the company’s employees. The Policy further ensures that such concerns are treated seriously and appropriately, and that any person raising such concerns in good faith will be protected from reprisals or retaliation.

6.0 PROCEDURES

6.1 Party Responsibilities and Incidents

6.1.1 The Whistleblower

- A. The Whistleblower shall disclose the following information through the Whistleblower Report (WR):
- B. Date and Time the infraction/s has/have been committed; may be estimated if unable to recall or information not available
- C. Full name and position of the employee, officer or board member being reported
- D. Specific conditions/actions/omissions/incidents that constitute violations
- E. Names and details of other non-company parties who may be involved
- F. Full name of the Whistleblower, and position if the whistleblower is an employee, subject to Section 6.1.4 of this Policy.

6.1.2 The Whistleblower shall submit their report truthfully and in good faith, with a view towards apprising the company of a reportable event and not for personal gain or any desire to cause harm to a reported person. Whenever possible, the report shall be submitted with any documentation or other corroborating evidence that can support the veracity of the same.

6.1.3 The whistleblower may report through the following Reporting Channels:

- A. Email: whistleblower@maxicare.com.ph
- B. Telephone Hotline:
- C. Face to face meeting with a member of the Receiver Team

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Whistleblower	Process Owner: Employee Relations	Effectivity Date: May 4, 2026	Document No: PP-ER-0.005	Rev. 03	Page 4 of 8
---------------	--------------------------------------	----------------------------------	-----------------------------	---------	----------------

6.1.4 Anonymous Reporting and Whistleblower Confidentiality

A Whistleblower shall not be required to divulge their identity through the provided Reporting Channels.. The IEC, Receiver Team and Investigator Team shall exert all reasonable efforts to process anonymous WRs within the limitations of the same.

When the Whistleblower shares their identity, all persons or entities entrusted with said identity directly or through the WR shall maintain the strictest confidentiality of the same and the privacy of any associated details, including contact information. The whistleblower shall not be compelled through any process of this Policy to reveal their identity, confront any person who is the subject of a WR, or otherwise expose themselves to possible retaliation or reprisal.

If the Whistleblower chooses to maintain the secrecy of their identity, any person who inadvertently or intentionally discloses the identity of the Whistleblower to any person not authorized to know the same shall be subject to the appropriate disciplinary sanctions, as applicable.

6.1.5 Witnesses

In the course of the processing of a WR, persons other than the Whistleblower who are able to provide first-hand information that reinforces or corroborates the WR may come forward or be identified by the IEC or the Investigator Team. Any person so situated shall be designated as a Witness, and accorded all of the same protections and rights as a Whistleblower.

6.1.6 Report of Retaliatory Action

Any Whistleblower or Witness who becomes the subject of any Retaliatory Action, as defined in this Policy, may report the same to the Receiver Team, who shall coordinate with Human Resources, and Legal as necessary, to take appropriate action against the perpetrator, as provided in this Policy or according to relevant law.

6.2 Powers and Responsibilities of the Receiver Team

- 6.2.1 The Receiver Team shall have access to all WRs and review each one to determine whether it is valid and warrants further investigation.
- 6.2.2 If a WR is deemed valid, the Receiver Team shall conduct a preliminary evaluation and present the same to the IEC for further disposition.
- 6.2.3 The Receiver Team shall maintain the record of all WRs in a suitable repository, and manage the archives of WRs and records of any resulting investigations and resolatory actions.
- 6.2.4 The Receiver Team shall inform whistleblowers of the determination of the validity of their WR, and if valid, when the same has been turned over to the IEC for disposition.
- 6.2.5 The Receiver Team shall receive reports of Retaliatory Action from affected Whistleblowers or Witnesses and coordinate with Human Resources and Legal for further disposition.
- 6.2.6 If any WR involves a member of the IEC and is determined by the Receiver Team to be valid, the Receiver Team shall prepare the necessary report and present the same directly to the President and CEO, who shall manage the same in accordance with Section 7 of this Policy.

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Whistleblower	Process Owner: Employee Relations	Effectivity Date: May 4, 2026	Document No: PP-ER-0.005	Rev. 03	Page 5 of 8
---------------	--------------------------------------	----------------------------------	-----------------------------	---------	----------------

6.2.7 The Receiver Team shall be granted sufficient leeway and flexibility in the management of their work schedule to ensure that they are able to perform their functions without the same compromising their usual work responsibilities.

6.2.8 The Receiver Team shall exercise reasonable discretion and judgment in the evaluation of all WRs, in accordance with what it deems fair and appropriate for escalation. It shall be guided by the following standards:

- A. The veracity and completeness of the WR in substance;
- B. The presence of supporting evidence to corroborate the allegations of the WR;
- C. The plausibility of the WR given the reputation of any person accused, the processes involved, and the presence of any checks and balances or other controls;
- D. The WR actually constituting a service complaint, a performance deficiency or any other circumstance more appropriately handled as a customer service or employee output issue; and
- E. The identity and reputation of the whistleblower, if their identity is shared or revealed.

6.3 Integrity and Ethics Committee (IEC)

6.3.1 The IEC shall be constituted as the body responsible for the oversight and management of this Policy. It shall be formed within thirty (30) days following the activation of this Policy, and shall be comprised of the following persons:

- A. The Chief Human Resources Officer (CHRO)
- B. The Chief Legal, Risk and Compliance Officer (CLRCO)
- C. The Chief Audit Officer (CAO)
- D. One (1) deputy appointed by each of the foregoing executives from their respective divisions, who may be rotated periodically as the IEC deems appropriate. The deputy shall have the rank of Senior Manager or higher, or the equivalent functions of the department head or deputy head of the Division, if nobody of such rank is available.

6.3.2 The IEC shall, upon its formation, identify and appoint certain employees of the Company with a rank of Manager to comprise the Receiver Team, who shall be entrusted with the functions indicated herein. The Receiver team shall be headed by the IEC deputy appointed by the CHRO, who shall likewise be considered a member of the Receiver Team. The Receiver Team shall comprise at least three (3) persons.

6.3.3 The IEC shall, upon its formation, identify and appoint certain employees of the Company with a rank of Manager to comprise the Investigator Team, who shall be entrusted with the functions indicated herein. The Investigator team shall be headed by the IEC deputy appointed by the CAO, who shall likewise be considered a member of the Investigator Team. The Investigator Team shall comprise at least three (3) persons.

6.3.4 The IEC may change the composition of the Receiver Team or the Investigator Team as it sees fit at any time, to add to its number or replace members, provided that its number shall always comprise at least three (3) persons.

6.4 Powers and Responsibilities of the IEC

6.4.1 The IEC shall convene within three (3) business days after receiving an endorsement from the Receiving Team of any WR, and decide within three (3) business days thereafter whether to submit the same to the Investigator Team for further analysis and discovery, or to provide a recommendation for further remedial action.

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Whistleblower	Process Owner: Employee Relations	Effectivity Date: May 4, 2026	Document No: PP-ER-0.005	Rev. 03	Page 6 of 8
---------------	--------------------------------------	----------------------------------	-----------------------------	---------	----------------

- 6.4.2 When the IEC deems it necessary to assign a WR to the Investigator Team, it shall exercise oversight as needed to ensure that the investigation is conducted efficiently and comprehensively,, and provide appropriate support to ensure that the investigation is given full support by all relevant groups within Maxicare.
- 6.4.3 The IEC shall be empowered to utilize resources from and coordinate with the Human Resources; Legal, Risk and Compliance; and Internal Audit divisions in order to conduct administrative disciplinary actions against errant employees, and file the necessary criminal or civil cases against perpetrators.
- 6.4.4 The IEC shall, at least once a quarter or as otherwise deemed appropriate by the President and CEO, prepare a summary report of all WRs that have been identified as valid, which shall include all significant details that would enable the reader to (a) understand each reported case thoroughly; (b) identify causes and areas of improvement to prevent further such incidents; and (c) evaluate whether the remedial actions taken were appropriate to the circumstances of each case. The report shall be provided to the President and CEO, the Special Observers, and the Board Audit Committee.
- 6.4.5 If the IEC receives a report that a case may potentially implicate or involve a member of the Board or an executive with a rank of Vice President or higher, it shall immediately inform the President and CEO and the Special Observers. The IEC shall then act under the direct guidance of the President and CEO or the Special Observers, as appropriate, subject to Section 7 of this Policy.

6.5 Powers and Responsibilities of the Investigator Team

- 6.5.1 The Investigator Team shall be empowered to take all reasonable measures to verify the facts of a WR assigned for its handling, and to determine the extent of any activities that may be related to the WR, even if not originally part of the report. For this purpose, the Investigator Team shall be empowered to interview employees or request responses to written queries, review documents that may be significant to a case, and utilize other such lawful and proportionate measures to obtain information.
- 6.5.2 If the Investigator Team discovers, in the course of its investigation, that any WR case may implicate or involve a member of the Board of Directors or any executive with a rank of Vice President or higher, they shall make a report of the same to the IEC, which shall manage the same further in accordance with Section 7 of this Policy.
- 6.5.3 If the Investigator Team discovers, in the course of its investigation, that any WR case may implicate or involve a member of the IEC, it shall report the same directly to the President and CEO, who shall manage the same directly in accordance with Section 7 of this Policy.
- 6.5.4 The Investigator Team shall be granted sufficient leeway and flexibility in the management of their work schedule to ensure that they are able to perform their functions without the same compromising their usual work responsibilities.

7.0 EXCEPTION HANDLING / ESCALATION

7.1 Exceptional Matters

7.1.1 High-Level Corruption

- A. Any WR that implicates or otherwise points to the involvement of a member of the Board or an executive with the rank of at least Vice President shall be brought to the attention of the President and CEO and the Special Observers for further guidance. That IEC shall, unless otherwise

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Whistleblower	Process Owner: Employee Relations	Effectivity Date: May 4, 2026	Document No: PP-ER-0.005	Rev. 03	Page 7 of 8
---------------	--------------------------------------	----------------------------------	-----------------------------	---------	----------------

instructed, continue to utilize all resources to complete the report, provided that it shall treat the subject WR case with appropriate weight and sensitivity. If the WR involves the President and CEO, they shall be excluded from this process and the IEC shall coordinate directly with the Special Observers only.

- B. Any WR that implicates or otherwise points to the involvement of a member of the IEC shall not be referred to the IEC as a body, but presented instead to the President and CEO, who shall convene a special investigation committee for the purpose of processing the case. This committee may still comprise members of the IEC, who shall be approached in their individual capacity and duly advised of the highly sensitive nature of the matter. The committee shall be empowered to act with the same capabilities as the IEC, though with an additional layer of confidentiality.

7.1.2 Rewards and Incentives

Certain WRs that lead to significant savings for Maxicare, or expose a substantial source of potential or actual losses, may be rewarded accordingly. The mechanics and value of any rewards shall be formulated separately from this Policy by the President and CEO and other executives that they may designate, with a view towards ensuring that the proposed system shall not encourage frivolous or malicious reporting.

7.2 Violations of this Policy and Penalties

- 7.2.1 Retaliation - any Retaliatory Action taken against a Whistleblower or a Witness by an employee shall be penalized by suspension to termination, depending on the gravity of the action and its reported effects. Provided that any act that would normally be considered a Retaliatory Action shall not be penalized if it is discovered to be a legitimate response to a violation of Maxicare's Code of Conduct or other relevant policy.
- 7.2.2 False Report - any Whistleblower who files a false or misleading WR shall be penalized by suspension if the report was made negligently, and with suspension to termination if the report was made maliciously, or with deliberate intent to damage the reputation and position of the reported person.
- 7.2.3 Disclosure of Anonymous Identity - any person who, having been made aware of the identity of a Whistleblower or a Witness in connection with the processing of a WR, divulges the same to a person not authorized to receive said information, shall be penalized with a written warning up to suspension, depending on whether the disclosure was done negligently or with intent to harm the person so exposed.
- 7.2.4 Obstruction of Investigation - any person who deliberately withholds valuable information that is being requested for the investigation of a WR, or otherwise acts in a manner to frustrate the efforts of the IEC or an Investigator Team, shall be penalized by a written warning up to termination, depending on the intentions of the person committing said act, including whether the same is being done to conceal a WR violation or protect a perpetrator.
- 7.2.5 The administrative actions and penalties associated with this Section shall be without prejudice to the filing by Maxicare of appropriate civil and criminal cases against perpetrators, as well as other actions that may be taken against persons not covered by employee disciplinary procedures.

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Whistleblower	Process Owner: Employee Relations	Effectivity Date: May 4, 2026	Document No: PP-ER-0.005	Rev. 03	Page 8 of 8
---------------	--------------------------------------	----------------------------------	-----------------------------	---------	----------------

8.0 REFERENCE DOCUMENTS

8.1 External

None

8.2 Internal

None

9.0 PROCESS WORKFLOW

None

10.0 HISTORY OF AMENDMENTS

History of Amendments			
Rev. No	Date	Approver Name & Designation	Previous Summary of Revisions [Change Details, Reason, and Impact]
02	December 1, 2021	Joe Meritto P. Buot Chief HR & Administration Division	<ol style="list-style-type: none"> Removed “Alternative Channels” under 3.5 Definition of terms. Updated the RASCI Matrix.
01	July 30, 2020	N/A	<ol style="list-style-type: none"> Remove: 4.2 Remedial Action “In case an investigation shows any violation of this policy, appropriate remedial action will be taken.” and Retention of Records “The Ethical Standards Office shall retain a copy of complaints or concerns, investigation reports and all relevant documentation. The Ethical Standards Office, with the approval of the Group Vice Chairman, shall decide the period of retention of all these records taking into consideration applicable laws and regulations on record safekeeping”. Addition of RASCI Matrix and Definition of Terms 3.1 to 3.6. Inclusion of 6.1 Reporting Channels; 6.2 Anonymous Reporting; 6.3 Handling; 7.1 Confidentiality and Protection from Retaliation; 7.2 Credibility of the Report and 8.0 Reference Documents.
00	October 30, 2018	N/A	New

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