


Policy/Procedure Title WHISTLEBLOWER POLICY		Reference No. PP-LCA-008	Revision No. REV-001	Page No. 1 of 6
	Department/ Unit:	Office of the Executive Director	Date of Approval:	14 AUG 2024
	Affects:	All employees of Travellers International Hotel Group, Inc. and its subsidiaries	Date of Effectivity:	Immediately upon approval
			Supersedes:	Whistleblower Program (Ref. No. TRA-RA-ADT-001) and S.C.A.R.F. Rewards Program (Ref. No. PP-SAS-032), and all other policies and procedures inconsistent herewith

1.0 PURPOSE/OBJECTIVE

- 1.1 This Policy emphasizes the commitment of Travellers International Hotel Group, Inc. and all of its subsidiaries (hereinafter collectively referred to as the "Company") to uphold and maintain utmost integrity as its core value in the conduct of its businesses.
- 1.2 Employees, business partners, customers, patrons, and other stakeholders are strongly encouraged to cooperate in the detection and eventual resolution of illegal and anomalous practices, such as, but not limited to, actual or suspected scams, crimes, abuses, riggings, fraud, corruption or bribery, unauthorized use or misappropriation of Company funds, falsification of documents, conflict of interest situation, and all other acts which may constitute serious violations of any policy, procedure, or any Philippine law, rule or regulation. A structured program is thus hereby established which will allow any individual to report illegal and anomalous practices in a confidential and secured manner, without fear of reprisal or retaliation, by submitting verifiable information and admissible evidence that could lead to the detection, prevention and resolution of illegal and anomalous practices.

2.0 SCOPE

- 2.1 This Policy shall apply to all directors, officers and employees of the Company, who have personal knowledge of any actual or suspected illegal and anomalous practices, which he or she will voluntarily and timely disclose to the designated officers of the Company as provided herein.
- 2.2 The procedures under this Policy may also apply to former employees, contractors or sub-contractors, suppliers, agency personnel, guests or patrons, and other stakeholders that have dealings with the Company.
- 2.3 The reportable conditions under this Policy shall include all illegal and anomalous practices such as, but not limited to, actual or suspected scams, crimes, abuses, riggings, fraud, corruption or bribery, unauthorized use or misappropriation of Company funds, falsification of documents, conflict of interest situation, and all other acts which may constitute serious violations of any policy, procedure, or any Philippine law, rule or regulation.

3.0 DEFINITIONS OF TERMS

- 3.1 **"Abuse"** refers to improper usage of authority, access or information, as well as unjust or unfair treatment of an individual or entity, to obtain unwarranted gain or benefit, to the damage and prejudice of the Company.
- 3.2 **"Conflict of interest situations"** refer to situations wherein a director's, officer's or employee's financial or other personal circumstances may lead him or her to actions, transactions and relationships that compromise his or her professional judgment and may place the Company at a disadvantage.
- 3.3 **"Conspiracy"** is a private agreement or cooperation between two or more persons to commit illegal and anomalous practices.



Policy/Procedure Title	Reference No.	Revision No.	Page No.
WHISTLEBLOWER POLICY	PP-LCA-008	REV-001	2 of 6

- 3.4 **"Corruption" or "bribery"** refers to agreeing to give or receive anything of value to influence the behavior of someone to gain undue benefit.
- 3.5 **"Crime"** is an act or omission punishable under the Revised Penal Code or Special Penal Laws.
- 3.6 **"Falsification of documents"** refers to the acts specified in Article 171 of the Revised Penal Code.
- 3.7 **"Fraud"** is defined as the voluntary execution of a wrongful act, or a willful omission, knowing and intending the effects which naturally and necessarily arise from such act or omission. It refers to all kinds of deception, whether through insidious machination, manipulation, concealment or misrepresentation, that would lead an ordinarily prudent person into error after taking the circumstances into account. For purposes of this policy, the term "fraud" shall also encompass all multifarious means which human ingenuity can devise, and which are resorted to by one individual or group of individuals to secure an advantage over the Company by false suggestions or by suppression of truth and includes all surprise, trick, cunning, dissembling and any unfair way by which the Company is cheated.
- 3.8 **"Informant"** refers to a person who voluntarily and timely relays to the Company credible and verifiable information involving illegal and anomalous practices based on personal knowledge that are not generally available to, or accessible by, the public or known to the Company. The identity of an informant shall remain anonymous and any data relevant to his or her identity shall be sealed and kept confidential, unless otherwise personally waived in writing by the informant.
- 3.9 **"Rigging"** is an act of dishonesty that involves designing and installing an equipment to fraudulently obtain a particular result.
- 3.10 **"Scam"** is a fraudulent or deceptive act or operation.
- 3.11 **"Special Action and Investigation Unit"** shall consist of officers and employees as may be designated or appointed by the Executive Director of the Company and shall serve as the Company's internal investigation team on reports of illegal and anomalous practices, such as, but not limited to, actual or suspected scams, crimes, abuses, riggings, fraud, corruption or bribery, unauthorized use or misappropriation of Company funds, falsification of documents, conflict of interest situation, and all other acts which may constitute serious violations of any policy, procedure, or any Philippine law, rule or regulation subject to the provisions under this Policy.
- 3.12 **"Unauthorized use or misappropriation of company funds"** refers to the intentional, unauthorized, improper or fraudulent use of Company funds by directors, officers or employees for purposes not authorized by the Company.
- 3.13 **"Whistleblower"** refers to an employee, business partner, customer, patron, or other stakeholder who reveals, reports or makes known any illegal and anomalous practices.

4.0 POLICY ADMINISTRATION

- 4.1 The proper implementation, administration and enforcement of this Policy are hereby entrusted to the Company's Office of the Executive Director, in close coordination with the Office of the Chairman, Office of the President, Legal, Admin & Corporate Affairs Department, Safety and Security Department, Human Resources Department and/or all other departments or units as may be warranted under the circumstances.

Policy/Procedure Title	Reference No.	Revision No.	Page No.
WHISTLEBLOWER POLICY	PP-LCA-008	REV-001	3 of 6

5.0 GENERAL POLICIES AND PROCEDURES

5.1 General Provisions

- 5.1.1 It is the policy of the Company to continue protecting its operational integrity and to install appropriate mechanisms designed to prevent the commission of illegal and anomalous practices such as, but not limited to, actual or suspected scams, crimes, abuses, riggings, fraud, corruption or bribery, unauthorized use or misappropriation of Company funds, falsification of documents, conflict of interest situation, and all other acts which may constitute serious violations of any policy, procedure, or any Philippine law, rule or regulation. The reporting procedures under this Policy are thus designed to encourage full cooperation from various stakeholders towards preventing incidents of illegal and anomalous practices within the Company, thereby creating a safer and more productive environment.
- 5.1.2 In implementing this Policy, the Company shall exert reasonable efforts to:
- 5.1.2.1 Reinforce detection of illegal and anomalous practices such as, but not limited to, actual or suspected scams, crimes, abuses, riggings, fraud, corruption or bribery, unauthorized use or misappropriation of Company funds, falsification of documents, conflict of interest situation, and all other acts which may constitute serious violations of any policy, procedure, or any Philippine law, rule or regulation.
 - 5.1.2.2 Encourage individuals with personal knowledge of any illegal and anomalous practices such as, but not limited to, actual or suspected scams, crimes, abuses, riggings, fraud, corruption or bribery, unauthorized use or misappropriation of Company funds, falsification of documents, conflict of interest situation, and all other acts which may constitute serious violations of any policy, procedure, or any Philippine law, rule or regulation to timely provide information to the Company, whether openly or anonymously.
 - 5.1.2.3 Minimize, if not totally eliminate, the risks of illegal and anomalous practices such as, but not limited to, actual or suspected scams, crimes, abuses, riggings, fraud, corruption or bribery, unauthorized use or misappropriation of Company funds, falsification of documents, conflict of interest situation, and all other acts which may constitute serious violations of any policy, procedure, or any Philippine law, rule or regulation within the Company.
 - 5.1.2.4 Maximize the scope of investigative options for a more comprehensive result.
 - 5.1.2.5 Institutionalize the program envisioned by the Policy and the concomitant investigation system.

5.2 Procedures

- 5.2.1 Appropriate notices shall be posted and disseminated by the Corporate Communications Department to inform the employees, contractors or sub-contractors, suppliers, agency personnel, guests or patrons, and other stakeholders of the reporting channels contemplated by this Policy.
- 5.2.2 Reports of illegal and anomalous practices shall be submitted to any of the following reporting channels:
- 5.2.2.1 Tipster Hotline: +63917-1155980
 - 5.2.2.2 Dedicated e-mail address: myreport@newportworldresorts.com
 - 5.2.2.3 Dedicated mail address: Office of the Executive Director, 10/F NECC Building, Newport Boulevard, Newport City Cyber tourism Zone, Pasay City, Philippines.
- 5.2.3 The whistleblower or informant may submit a verifiable report of any illegal and anomalous practices such as, but not limited to, actual or suspected scams, crimes, abuses, riggings, fraud, corruption or bribery, unauthorized use or misappropriation of Company funds, falsification of documents, conflict of interest situation, and all other acts which may constitute serious violations of any policy, procedure, or any Philippine law, rule or regulation anytime by phone, text message, e-mail, or ordinary or registered mail.

Policy/Procedure Title	Reference No.	Revision No.	Page No.
WHISTLEBLOWER POLICY	PP-LCA-008	REV-001	4 of 6

No specific format shall be required and the report may be made in English or Filipino. He or she may also choose to disclose his/her identity or remain anonymous.

The following information must be included in the report:

- (a) Name of the person/s involved; and
 - (b) Detailed facts, including the time and place of the incident or activity (if possible), the nature of the illegal and anomalous practice, any evidence in support thereof, and other relevant information.
- 5.2.4 The Executive Director shall have primary access to all reports and information received through the reporting channels mentioned in Section 5.2.2 above.
- 5.2.5 The Executive Director will screen and assess the following:
- 5.2.5.1 Veracity and timeliness of the information relayed by the whistleblower or informant.
 - 5.2.5.2 Source and credibility of the information.
 - 5.2.5.3 Additional information or pieces of evidence needed.
 - 5.2.5.4 Relevance and type of issue/s involved.
- 5.2.6 After screening and assessment, the Executive Director shall determine whether to:
- 5.2.6.1 Act on the case upon consultation with and concurrence of the Chairman and the President/CEO;
 - 5.2.6.2 Refer the case to the Company's Special Action and Investigation Unit or external resources, for further investigation and gathering of additional information and evidence;
 - 5.2.6.3 Refer the case to the Legal, Admin & Corporate Affairs Department, for institution of administrative proceedings or filing of appropriate civil and/or criminal cases, as may be warranted;
- 5.2.7 Referral to Special Action and Investigation Unit
- 5.2.7.1 The Special Action and Investigation Unit shall conduct an investigation on the reported information and shall submit a full report of the results thereof, together with the recommended courses of action, to the Executive Director who shall then determine the subsequent actions in accordance with Section 5.2.6.3 above.
 - 5.2.7.2 If, based on its assessment, a more comprehensive investigation is necessary to promptly resolve the case, the Special Action and Investigation Unit shall promptly inform the Executive Director of such recommendation, for appropriate action/s in accordance with Section 5.2.6.2 above
 - 5.2.7.3 All reports and recommendations of the Special Action and Investigation Unit shall be submitted, within fifteen (15) calendar days, or any mutually agreed extension thereof, to the Executive Director, who shall then make a final decision on the subsequent actions to be taken.
 - 5.2.7.4 The Special Action and Investigation Unit shall be in charge of records/Information management and maintain a record of:
 - 5.2.7.4.1 The report date
 - 5.2.7.4.2 The source, if provided
 - 5.2.7.4.3 If anonymity is desired or waived
 - 5.2.7.4.4 Contact information, if provided
 - 5.2.7.4.5 Details of the allegation, including the suspect(s) involved

Policy/Procedure Title	Reference No.	Revision No.	Page No.
WHISTLEBLOWER POLICY	PP-LCA-008	REV-001	5 of 6

5.2.7.4.6 Any additional information provided, such as the location of evidence

5.2.7.4.7 Recommended action based on the initial assessment of the report

5.2.8 Referral to Legal, Admin & Corporate Affairs Department

5.2.8.1 If the Executive Director determines that the reports are legitimate and supported by substantial evidence, the case may be immediately referred to the Legal, Admin & Corporate Affairs Department, for institution of administrative proceedings or filing of appropriate civil and/or criminal cases, as may be warranted.

5.2.8.2 The Legal, Admin & Corporate Affairs Department shall, from time to time, update the Executive Director of the progress of the case and all actions taken in relation thereto.

5.2.9 Other appropriate action

5.2.9.1 The Executive Director reserves the right to take any other appropriate action and use all available internal or external resources that may aid in the gathering of additional information or evidence.

5.2.9.2 The Executive Director may likewise determine, if necessary and upon consultation with, and concurrence of, the Chairman and the President/CEO, to extend a reward, either monetary or non-monetary, to whistleblowers and informants who shall provide admissible evidence that will lead to the successful resolution of the case; Provided, the following conditions are present:

5.2.9.2.1 There is no other direct evidence available to the Company in relation to the illegal, irregular or anomalous acts reported, except the information based on verifiable personal knowledge of the informant.

5.2.9.2.2 The information relayed by the informant can be substantially corroborated in its material points;

5.2.9.2.3 The whistleblower does not appear to be the most guilty;

5.2.9.2.4 The whistleblower has not misrepresented or concealed any fact to the Company in relation to the illegal, irregular or anomalous acts reported; and

5.2.9.2.5 If the whistleblower is an employee, the disclosure of information should not be part of his or her normal duties and responsibilities.

5.2.10 Existing employees and those who will henceforth be hired will be oriented and informed of the salient provisions of this Policy.

5.3 Protection against Retaliation (*Safe Harbour Clause*)

5.3.1 Whistleblowers and informants shall not suffer any negative repercussions for reporting, in good faith, actual or suspected illegal and anomalous practices.

5.3.2 Attempts to intimidate or threaten a whistleblower to prevent disclosure under this Policy, or any form of retaliation against or harassment of a whistleblower following a disclosure made under this Policy, are strictly prohibited and will be subject to appropriate disciplinary action under the Company's Code of Conduct, without prejudice to appropriate legal actions that may be taken by the Company in accordance with applicable laws.

5.4 Confidentiality

5.4.1 All whistleblower tips, reports, and disclosure received under this Policy and all information provided or discovered in the course of an investigation will be treated with utmost confidentiality. Every effort shall be

Policy/Procedure Title	Reference No.	Revision No.	Page No.
WHISTLEBLOWER POLICY	PP-LCA-008	REV-001	6 of 6

made to protect the identity of the whistleblower or informant. At appropriate times and at the proper forum, however, a whistleblower or informant may be required by law to act and testify as a witness.

5.5 Intentional Submission of False, Frivolous or Misleading Whistleblower Complaints

- 5.5.1 Intentional submission by a whistleblower of false, frivolous or misleading reports may result in the institution of appropriate administrative proceedings against the erring employee in accordance with the Company's Code of Conduct, if the whistleblower is an employee; or, appropriate legal actions against the erring business partner, customer, patron, or other stakeholder, if the whistleblower is such. This is without prejudice to appropriate legal actions that may be taken by the Company against the erring whistleblower in accordance with applicable laws for any loss or damage as a result of the false report.
- 5.5.2 Disclosures which are fabricated, made in bad faith, or with the sole intent to be malicious, vindictive, or merely disruptive, will not be tolerated and will be subject to appropriate legal actions that may be taken by the Company in accordance with applicable laws.

6.0 VIOLATION OF THE POLICY

- 6.1 Violation of any provision hereof shall result in the institution of administrative proceedings under Title I, Section 1.4.6 of the Company's Code of Conduct on *insubordination and deliberate refusal to abide by lawful orders and policies of Newport World Resorts*, among other Level 4 offenses that merit termination of employment.
- 6.2 Manpower agencies engaged by the Company shall be required to apply and strictly implement this Policy to all agency personnel deployed to the Company. Violation of any provision hereof shall result in the institution of administrative proceedings under the appropriate code of conduct of the employer of the agency personnel, and cessation of deployment in the Company or substitution of the concerned agency personnel as may be required by the Company. For the avoidance of doubt, any disciplinary action against an agency personnel shall be processed by their agency employer.

7.0 REVISIONS/AMENDMENTS

- 7.1 This Policy supersedes the Whistleblower Program (Ref. No. TRA-RA-ADT-001) dated 01 April 2012, S.C.A.R.F. Rewards Program (Ref. No. PP-SAS-032) dated 26 March 2018, and any existing policy, agreement, prior communication and/or instructions on matters covered herein, insofar as they may be inconsistent herewith, that may have been issued or discussed prior to the effectivity hereof.
- 7.2 Exceptions to the strict application of the terms of this Policy shall be of legal effect only upon the written approval of the Chairman, President and Chief Executive Officer, and Executive Director.
- 7.3 The Company reserves the right to modify, alter, amend, add and/or delete any provision of this Policy.
- 7.4 This Policy shall be effective immediately upon publication.

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