

 <p>SMC STENIEL MANUFACTURING CORPORATION</p>	DOCUMENT	DOCUMENT NO	SMC-HRM-POL-2023-01-010
	POLICIES & PROCEDURE	DATE OF EFFECTIVITY	Nov. 13, 2023
	SUBJECT WHISTLEBLOWING POLICY	REVISION DATE	N/A
	This is a controlled document. Should a revision be issued, please return the superseded document and replace it with the updated document.		5 Pages

1. POLICY OBJECTIVE

1.1 **Steniel Manufacturing Corporation “SMC”** is committed to operate in compliance with all applicable laws, rules, and regulations, including those concerning accounting and auditing, and prohibits fraudulent practices by any of its board members, officers, employees, or volunteers.

1.2 **Steniel Manufacturing Corporation**, is governed by its core values on integrity, loyalty, excellence, accountability and discipline in the pursuit of conducting its business both within and outside the organization.

1.3 The policy is intended to assist employees and third parties who directly engages with the Company to disclose information relevant to the suspected misconduct, malpractice or irregularity through a confidential reporting channel. Also, this policy is not crafted to further any personal dispute, question financial or business decision taken by the Company nor reconsider any employee matters that have been addressed under employee discipline or case management procedure.

2. COVERAGE

This policy shall apply to all employees of the Company, regardless of classification, rank and status and shall strictly comply and adhere with all the applicable laws, rules, regulations, ethical standards, and corporate policies.

3. REPORTABLE CONDITIONS

3.1 Whistleblowers may report acts or omissions of malpractice, or irregularity that violates the Company’s values and ethical standards and business practices as such as but not limited to the following:

- 3.1.1 Malpractice, impropriety or fraud relating to internal controls, accounting, auditing, and other financial matters
- 3.1.2 Violation of the rules and regulations of the Company or the Code of Conduct
- 3.1.3 Workplace discrimination or abuse of authority
- 3.1.4 Gross incompetence

- 3.1.5 Engaging in transactions that are evidently disadvantageous to the Company
- 3.1.6 Undue delay in the rendition of service
- 3.1.7 Gross or habitual negligence or duties and responsibilities
- 3.1.8 Willful suppression of facts or deception in matters of appointment, placements, submission of reports, committee recommendations, which would result in wrongful gain or loss to the parties involve; and
- 3.1.9 Other analogous cases

4. REPORTING CHANNEL

- 4.1 If an employee or whistleblower has a reasonable belief that an employee has engaged in any action that violates any applicable law, or regulation, including those concerning accounting and auditing, or constitutes a fraudulent practice, the employee is expected to immediately report such information to the Immediate Superior and/or Department Head.
- 4.2 If the employee does not feel comfortable reporting the information to the Immediate Superior and/or Department Head, he or she is expected to report the information to the HR Department and/or Assistant General Manager/ General Manager.
- 4.3 E-mail : Human Resources Manager
- 4.4 Registered Mail : SMC – 9118 SL Delos Reyes St., Gateway Business Park, Brgy. Javalera, General Trias, Cavite, Philippines
 - 4.4.1 A witness may also prepare a letter and sent it to the Company’s official address and address to office of the Human Resources Head – in a sealed envelope which indicates “STRICTLY PRIVATE AND CONFIDENTIAL – TO BE OPENED BY ADDRESSEE ONLY” to ensure confidentiality.
- 4.5 All reports and complaints shall be handled discretely and in strict confidentiality.

5. PROTECTION OF WHISTLEBLOWER AGAINST RETALIATION

- 5.1 The Company ensures that all whistleblowers who submitted complaints and/or reports in good faith shall be protected against any act of retaliation and will provide all possible assistance under law at any given circumstances. In addition to the retaliatory acts in the Anti-Retaliatory Policy, such retaliatory acts may also include:
 - 5.1.1 Discrimination or harassment in the workplace
 - 5.1.2 Demotion or reduction of Salary and benefits
 - 5.1.3 Employment or contract termination
 - 5.1.4 Evident bias in Performance Review or Evaluation

5.1.5 Any acts or threats that adversely affect the rights and interest of the whistleblower

5.2 Any retaliatory acts against a whistleblower or witness are strongly prohibited and will be dealt with in accordance with this policy and other rules and regulations established by the Company. Any employees who have identified themselves as a whistleblower or witness shall be reported.

6. ANONYMOUS REPORT

6.1 The Company takes reporting misconducts, malpractice, and irregularities seriously and will conduct investigation of both potential and actual violations without bias and prejudice to the respondent. Hence, the Company prefers that all reports are not made anonymously. However, employees or complainants may choose to identify him/herself or not for purposes of protecting one's identity and possible discrimination or retaliation as provided in Section 5 of this policy.

7. POLICY PROCEDURE

7.1 Submission of Complaints/Reports

7.1.1 Any complaints or reports must be filed and submitted to the Good Governance Affairs Committee or Top Management through the reporting channels identified in this policy (Section 4).

7.1.2 The whistleblower may elect to identify him/herself or remain anonymous. In the event that the whistleblower chooses to remain anonymous, he/she should provide a contact number for the purpose of evaluation of the report.

7.1.3 For verbal or face-to-face meetings, the HRD Manager shall solicit and document as much information and details from the whistleblower including supporting documents and evidence, written statements and/or witnesses which shall be duly signed.

7.2 Evaluation of the Complaint

7.2.1 Prior to proceeding with the investigation and endorsing the complaint or report to the top management, the HR shall review the following:

7.2.1.1 The report or complaint must contain the following:

7.2.1.1.1 The full name and position of the person complained/reported (respondent)

7.2.1.1.2 Specific charges or violations

7.2.1.1.3 Brief statement of relevant facts, time and place of the commission of the act or omission complained of, the person

involved or witness that could aid in identifying the nature of the violation or offenses;

7.2.1.1.4 Any pieces of evidence that the complainant may have, which includes but not limited to signed affidavits of witnesses and/or third parties, logbooks, email threads, photos, and other documents relevant to the case

7.2.1.2 After evaluation of the complaint or report, an investigation to further gather information and supporting documents shall be conducted by the HR Department.

7.2.2 If the Good Governance Affairs Committee (or Top Management) finds the complaint or report insufficient due to the failure of the Whistleblower to provide sufficient information according to Section 7.2, the whistleblower will be informed through HR Manager, whether identified or anonymous, using the contact details provided, that such insufficiency may constrain the Top Management in taking appropriate action and closing the case as the lack of information prevents the proper conduct of investigation.

8. CASE MANAGEMENT

8.1 After evaluation and endorsement of the complaint or report to the appropriate committee, it shall follow the process established on the Employee Case Management and Code of Conduct.

9. UNTRUE ALLEGATIONS

9.1 Said complainant or whistleblower may be subject to disciplinary action.

10. CONFIDENTIALITY

10.1 It is the intention of the Company to ensure that the rights of the parties are protected. At the same time, dignity and honor shall be preserved for all parties concerned by keeping as confidential at all times, even after the resolution and decision, all the information gathered through the investigation and hearing process.

11. UPDATE AND NOTIFICATION

11.1 The Company shall periodically review the implementation of this policy and may change, modify, or amend any provisions, as may be necessary and appropriate to support business goals and to comply with legal requirements.

11.2 Employees are responsible for understanding or seeking clarification of any guidelines outlined in this document and for familiarizing themselves with its current version.

12. REPEALING CLAUSE

Other standards, guidelines and policies contrary to, or inconsistent with, the provisions of this document are hereby repealed, modified, or amended.

13. EFFECTIVITY

This Policy shall be made known to every working member and shall take place effective immediately.

For our common information and guidance.