

WHISTLEBLOWING POLICY RESPONSIBILITIES

APP.01

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Following are the roles and responsibilities of the concerned Groups:

1. **Reporting Channels** shall be responsible for:

- 1.1. Acknowledging receipt of the report and update the informant/employee on the status and manner the report/concern is being handled;
- 1.2. Utilizing the Company's resources from its various Groups in investigating the veracity of the report, coordinating 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; and
- 1.3. Overseeing the implementation of this Policy.
- 1.4. Referring the report to the CICOM for further investigation.

2. **Conflicts of Interest Committee (CICOM)** shall be responsible for:

- 2.1. Receiving, conducting a preliminary evaluation and endorsing the Complaints to the Investigation Team for further handling and investigation;
- 2.2. Updating the Whistleblower on the status and manner by which his/her report is being handled;
- 2.3. Monitoring and maintaining records of the receipt, disposition and resolution of all Complaints and ensuring the appropriate monthly reporting thereof to the Audit Committee; and
- 2.4. Overseeing the implementation of this policy.

3. The Investigation Team shall be responsible for:

- 3.1. Coordinating and collaborating with the relevant people/groups needed in conducting the investigation (including coordination with the concerned employee's Immediate Superior, conducting administrative investigations, etc.);
- 3.2. Arranging individual interviews with relevant witnesses or individuals;
- 3.3. Establishing the facts, obtaining statements and collecting documentary evidence;
- 3.4. Maintaining detailed records of the investigation process;
- 3.5. Making any recommendation for action to be submitted to the CICOM and to the Audit Committee.

4. Whistleblower/Witnesses shall be responsible for:

- 4.1. Providing sufficient information about his personal identity and the reasons for making the complaint/disclosure;
- 4.2. Whistleblowers must provide sufficient corroborating evidence to justify the commencement of the investigation;
- 4.3. Reporting 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;
- 4.4. Providing truthful information and not acting maliciously or making false accusations;
- 4.5. Cooperating with the Investigation Team, including making available for examination all necessary records and information;
- 4.6. Refraining from discussing or disclosing the investigation or their testimony with anyone not connected with the investigation.

Robinsons Land Corporation Whistleblowing Policy