

ST. PETER LIFE PLAN, INC. WHISTLEBLOWING POLICY

POLICY GUIDELINES OF THE ST. PETER LIFE PLAN, INC. WHISTLEBLOWING POLICY:

A. KEY OBJECTIVES

1. To instill and promote integrity, accountability, ethical behavior and good governance in company culture and at all levels of the organization.
2. Encourage whistleblowing on all violations of company policies and all actions and omissions that are illegal and unethical by providing protection from retaliation or harassment and necessary assistance to whistleblowing employees and informants.

B. POLICY GUIDELINES AND PROCEDURES

1. It shall be the duty of all employees who personally witness or become aware of any attempted, ongoing, or consummated violations of Company policy or any acts or omissions that are illegal, unethical, or which constitute unsound and unhealthy business practices, to report such at the earliest possible time through any of the reporting channels as enumerated below:

Reporting Channels	
Official website	St. Peter Life Plan, Inc. Website https://www.stpeter.com.ph/
Face-to face direct reporting	St. Peter Life Plan, Inc. officers and employees
Telephone	PLDT Landline: (02) 83719999 SMART: (09190569999) GLOBE Landline: (02) 79469999
Email Address	lifeplanchapels@stpeter.com.ph
Mail	St. Peter Life Plan, Inc. St. Peter Corporate Center, 999 EDSA, Quezon City

2. Violations of Company Policy

- a. Whistleblowers may report acts or omissions that are illegal, unethical which violate good governance principles, contrary to public policy and morals, or which constitute unsound and unhealthy business practices, such as, but not limited to the following:

- 1) Abuse of authority
- 2) Bribery
- 3) Unfair favoritism
- 4) Conflict of interest
- 5) Moonlighting (personal sideline business)
- 6) Destruction/manipulation of records
- 7) Inefficiency
- 8) False statements
- 9) Falsification
- 10) Fraud
- 11) Malversation
- 12) Misappropriation of funds or assets
- 13) Misconduct
- 14) Negligence of duty
- 15) Nepotism
- 16) Receiving unauthorized commissions
- 17) Undue delay in rendition of service
- 18) Undue influence

- 19) Unethical acts, behavior, practices
- 20) Violations of company policies.
- 21) Violation of Anti-Sexual Harassment Act or Safe Spaces Act
- 22) Unfair discrimination or harassment in the workplace
- 23) Unfair demotion
- 24) Unfair reduction in salary or benefits
- 25) Acts or threats adversely affecting the rights of whistleblowers
- 26) Violation of laws, rules and regulations

3. Rights of Whistleblowers

a. Confidentiality

St. Peter Life Plan, Inc. shall ensure the confidentiality of all information arising from whistleblowing reports submitted pursuant to these guidelines. It shall treat all reports, including the identity of the whistleblower and the person/s complained of, in a confidential and sensitive manner. The identity of the whistleblower shall be kept confidential or placed under anonymity, unless compelled by law or the courts to be revealed, or unless the whistleblower authorized the disclosure of his/her identity.

b. Protection against Retaliatory Actions subject to the conditions/requisites under Provisions B.4. and B.5. hereof

- 1) No administrative action shall be entertained or pursued by the Company against a whistleblower relating to a whistleblowing report done in good faith or relating to a disclosure which is deemed protected under this policy.
- 2) Any employee who refuses to follow orders to perform an act that would constitute a violation of this provision shall likewise be protected from retaliatory actions and administrative action.

c. No Breach of Duty of Confidentiality

Subject to the provisions of this policy, a whistleblower who is under an obligation to maintain confidentiality of information shall not be deemed to have committed a breach of confidentiality if he/she makes a protected disclosure of such confidential information.

4. Conditions/Requisites for Protected Whistleblower's Report/Disclosure

Whistleblowers shall be entitled to all rights, protection and assistance under this policy after due evaluation made by the Company shows a valid basis, and if all the following conditions/requisites are fulfilled:

- a. The whistleblower's report or disclosure is made voluntarily, in writing, and under oath (**See attached Whistleblower's Report Form**).
- b. The whistleblower's report or disclosure pertains to a matter which is not yet the subject of a pending complaint or company case or ongoing investigation, except if the disclosure is necessary for the effective and successful prosecution or investigation which is forthcoming, or would constitute material evidence not yet in the possession of the Company of a forthcoming case or investigation.
- c. The whistleblower is expected and required to assist and participate in proceedings or investigations which were commenced in connection with the subject matter of the whistleblower's report or disclosure.
- d. The whistleblower should have personal knowledge of facts and information covered by the report or disclosure.
- e. The information given by the whistleblower contains sufficient particulars and details and, he/she submits or undertakes to submit material evidence that may be in his/her possession.

5. Verification and Evaluation of Whistleblower's Report or Disclosures

- a. Whistleblower reports or disclosures shall be subject to a thorough verification, validation and evaluation to determine whether or not these constitute a protected whistleblower's report or disclosure under this policy. The diligent evaluation shall consider the following factors, among others:
 - 1) Whether or not the veracity of the whistleblower's report or disclosure is doubtful and there is no corroborative evidence to support it.
 - 2) Whether or not the facts, details or figures given in the disclosure appear erroneous or inconsistent after proper examination.
 - 3) Whether or not the documents attached to the disclosure appear to be spurious or contradictory to or inconsistent with the information in the whistleblower's report or disclosure.
 - 4) Whether or not the whistleblower's report or disclosure substantially varies with or contradicts the facts or details contained in official information and authentic documents which were determined to be truthful.
 - 5) Whether or not there is undue delay in divulging the information or offense alleged to have been committed and the delay is not sufficiently explained or justified and there are material omissions, discrepancies of facts and details which tend to deviate from the natural and logical flow of facts and circumstances.
 - 6) Whether or not there is a retraction, refusal, or clear hesitation on the part of the whistleblower to submit material evidence in his/her possession and/or to swear under oath to the truth thereof.
 - 7) Whether or not the whistleblower's report or disclosure appears incredible or improbable considering logic, knowledge, ordinary observation, and common experience of man.
- b. An employee who makes a whistleblower's report or disclosure which is determined as unprotected or not qualified herein shall not be entitled to any immunity, or other right or privilege accorded under this policy.

6. Whistleblower is a Party to or is Involved in an Illegal or Unethical Act or Omission

A whistleblower's report or disclosure made by an employee who is a party to or is involved in an act or omission or violation referred to under Provision B.2 of this policy may be considered a protected whistleblower's report or disclosure and be entitled to the rights and assistance due to a whistleblower, provided that the following are complied with:

- a. The whistleblower complies with the conditions under Provision B.4 of this policy.
- b. The whistleblower should not appear to be the most guilty.
- c. The whistleblower testifies in accordance with his/her disclosures in accordance with this policy.
- d. The disclosure is necessary for a proper prosecution or investigation of the act or omission or violation.
- e. The whistleblower's testimony can be substantially corroborated on material points in conformity with Provision B.4.e of this policy.

7. Procedures for Protected Whistleblower's Report or Disclosure

- a. Upon receipt of a whistleblower report or such similar disclosure, report or communication, an evaluation shall immediately be made if it qualifies as a protected whistleblower's report or disclosure under this policy.
- b. The evaluation and the whistleblower report shall then be immediately referred to the proper officers for a fact-finding investigation and/or the Internal Audit Group for special audit, depending on the circumstances.

- c. Upon completion of the investigation and/or audit, the final reports shall be submitted to the proper officers for decisions/actions immediately or not later than fifteen (15) calendar days in accordance with applicable rules and regulations.
- d. The whistleblower's report and other related documents shall be compiled and labeled as "confidential" at all times and properly filed for confidential safekeeping.
- e. The Audit Committee, as the oversight body of the whistleblowing policy, shall prepare and present to the Board of Directors an annual status report of the current whistleblower reports within the first (1st) quarter of the succeeding year.

8. Protection and Assistance Given to Whistleblower and Witnesses


- a. In cases involving grave threats to the life and/or safety of the whistleblower, the appropriate or necessary actions may be taken by the Company for the protection and support of the whistleblower.
- b. Any employee who testifies in any proceeding arising from whistleblower reports or a protected disclosure shall be accorded the same protection against retaliatory actions as provided hereunder.
- c. All necessary and appropriate assistance or support (e.g. legal assistance, counseling services, access to employee assistance programs, physical security, etc.) as may be warranted under the circumstances shall be provided to a whistleblower and similar witnesses upon approval by the Management.

C. PENALTIES/SANCTIONS

- 1. Any employee who violates the protection of confidentiality of a protected disclosure or whistleblower reports shall be subject to disciplinary and/or criminal action as may be provided under Company policy and under existing pertinent, relevant laws and rules and regulations of other regulatory agencies.
- 2. Malicious whistleblower reports or disclosures or those which are made with malicious intent or with the sole objective of damaging an employee and/or his/her reputation, shall be sufficient grounds for the termination of the protection or assistance to whistleblowers under these guidelines, including the termination of their immunity from administrative cases, civil and/or criminal actions as may be appropriate.
 - a. In case a whistleblowing allegation is found to be incorrect but the whistleblower's accusation was founded on a reasonable cause or was made without malice or ill intent or deliberate bad faith, the whistleblower will not be liable.
 - b. However, if the accusation of the whistleblower report is determined to be malicious, made with ill intent, or in deliberate bad faith with the intent to cause damage to the reputation of the target of the whistleblower report, the matter will be subject to appropriate investigation and administrative disciplinary action.
- 3. Any employee who commits or causes or encourages retaliatory actions as defined under these guidelines against a whistleblower and/or employees supporting the whistleblower shall be subjected to administrative, civil, and/or criminal proceedings.

D. EFFECTIVITY

This policy shall take effect upon approval.


VICTOR JOSE R. TANCINCO
 Chairman of the Board


JONATHAN B. VITANGCOL
 President and Chief Executive Officer

Date signed: May 18, 2026

WHISTLEBLOWER'S REPORT FORM

I. PERSONAL INFORMATION	
1. Full Name of Complainant/Informer	
2. Position/Designation	
3. Department/Branch/Business Unit	
4. Contact Number	
5. Email Address	
6. Address	
II. EMPLOYEE(S) BEING COMPLAINED OF	
1. Full Name of Employee(s) Being Complained of	
2. Position/Designation	
3. Department/ Branch/Business Unit	
III. COMPLAINT	
1. Nature of the Complaint	
2. Statement of Relevant and Material Facts (Provide a detailed statement of relevant and material facts pertaining to the whistleblower report or complaint or disclosure. Include dates, locations, specific incidents and other witnesses, if any.)	
3. Supporting Documents / Documentary Evidence (List of Supporting Documents / Documentary Evidence Submitted)	
4. List of Other Witnesses	
IV. DECLARATION	
<ul style="list-style-type: none"> • I hereby declare that this whistleblower report/complaint/disclosure is made voluntarily and under oath and I have personal knowledge of the facts and information covered by this disclosure. • I formally undertake to assist and participate in proceedings or investigations commenced in connection with the subject matter of this disclosure. • I undertake to submit material evidence that may be in my possession in connection with this whistleblower report/complaint/disclosure. 	

IN WITNESS WHEREOF, I hereunto affixed my signature this ___ day of _____ at _____.

Signature over Printed Name

SUBSCRIBED AND SWORN to before me, a duly authorized notary public for and in _____ this ___ day of _____ at _____, I HEREBY CERTIFY that I have personally examined the herein affiant and I am satisfied that they voluntarily executed and understood their given affidavit.

Doc. No. ____;
Page No. ____;
Book No. ____;
Series of 20__.