 <b>HOUSE OF INVESTMENTS</b>	<b>HUMAN RESOURCES &amp; ADMINISTRATION DEPARTMENT</b> <b>HR POLICY MANUAL</b>	Document No.	HI-AD-11
		Revision No.	003
		Effective Date	April 1, 2024
	<b>Whistleblowing Policy</b>	Last Updated	July 2023
		Page No.	Page 2 of 7
		Documentary Sensitivity	Internal Use

**I. Policy:**

As stated in the Whistleblowing Policy issued by the Human Resource Department and Legal Department on April 1, 2010 – *“The Company is committed to do business according to the highest ethical legal standards pursuant to its Code of Business Conduct and Ethics. All employees are required to practice honesty and integrity in fulfilling their duties and responsibilities and are expected to comply with applicable laws and company policies, rules and regulations, in order that the Company’s good name and interests may be safeguarded.”*

**II. Scope:**

This policy aims to:


1. Provide an avenue for the whistleblower to raise concerns such as but not limited to the following - fraud, dishonesty, and other illegal or unethical acts constituting bribery, corruption, abuse of authority or position, gross negligence or such other similar or analogous acts.
2. Provide additional guidelines on the proper handling of suspected or actual occurrences of the acts mentioned above without fear of retribution.

**III. Objectives:**

1. This policy shall cover all employees of House of Investments, Inc. and its subsidiaries (Please refer to Annex A for the list of covered companies), clients, customers, and third-party vendors.
2. This policy is intended to address the following issues:
  - a. Conduct which constitutes a breach of law;
  - b. Possible fraud, bribery, corruption, abuse of authority or position;
  - c. Acts or behavior in violation of the Company’s Code of Business Conduct and Ethics;
  - d. Acts which contravene Company policies, procedure, and practice in handling of Company funds; and
  - e. Other similar or analogous acts to the foregoing circumstances mentioned above

**IV. Definition of Terms:**


1. Whistleblowing – is the disclosure of information believed to evidence the contravention of any of the incidence under Section III. Objectives, No. 2.

 <b>HOUSE OF INVESTMENTS</b>	<b>HUMAN RESOURCES &amp; ADMINISTRATION DEPARTMENT</b> <b>HR POLICY MANUAL</b>	Document No.	HI-AD-11
		Revision No.	003
		Effective Date	April 1, 2024
	<b>Whistleblowing Policy</b>	Last Updated	July 2023
		Page No.	Page 3 of 7
		Documentary Sensitivity	Internal Use

2. Whistleblower – refers to an employee, client, customer, or third-party vendor, who comes forward and discloses information which he/she believes contains pieces of evidence that contravenes any of the instances under Section III. Objectives, No. 2.
3. Reporting channels – The initial point of contact of the whistleblower with whom he/she believes to be objective and will get fair treatment. Reporting channels can be any of the following:
  - a. Mail or eMail addressed to the Heads of HR BU, HI Legal and Compliance Department, or HI Internal Audit;
  - b. Face to face meetings with immediate head, HR BU, HI Legal and Compliance, or HI Internal Audit;
  - c. Official email specifically for the Whistleblowing Policy. Access shall be given to the authorized representatives from HR and Legal and Compliance.
4. Respondent – refers to the person who is the subject of the report filed with the Company.
5. Incident Report – pertains to a written and signed document which narrates events that occurred, including relevant information, as initially disclosed by the whistleblower through any of the reporting channels.
6. Anonymous Report – is a report received, written or oral, in which the identity of the person is not revealed.
7. BU – Business Unit

**V. Roles and Responsibilities:**

1. The Company’s Board of Directors (BOD) and/or Senior Management has the overall responsibility for the Whistleblowing Policy.
2. HI Legal and Compliance Officer:
  - a. Ensures proper implementation of the policy;
  - b. Ensures that the process of handling whistleblowing related cases is properly implemented in strict observance of the guidelines set in this policy;
  - c. Conducts administrative hearings;
  - d. Advises the HI President and CEO, the HI Chief Operations Officer (COO), and the HI Audit Committee on matters considered material and serious in nature.

 <b>HOUSE OF INVESTMENTS</b>	<b>HUMAN RESOURCES &amp; ADMINISTRATION DEPARTMENT</b> <b>HR POLICY MANUAL</b>	Document No.	HI-AD-11
		Revision No.	003
		Effective Date	April 1, 2024
	<b>Whistleblowing Policy</b>	Last Updated	July 2023
		Page No.	Page 4 of 7
		Documentary Sensitivity	Internal Use

3. Human Resource Department:

- a. Coordinates schedule of administrative hearing;
- b. Issues notice of decision to all parties involved.

VI. **Guidelines:**

1. Confidentiality


- a. The Company shall ensure that all information from whistleblowing reports and the person/s complained of shall be kept confidential including the identity of the whistleblower. Any unauthorized disclosure shall be dealt with in accordance with the Company's Code of Conduct.
- b. The identity of the whistleblower will be kept confidential except in the following conditions:
  - (i) When compelled by law or the Courts to be revealed; or
  - (ii) The whistleblower authorized the release of his/her identity

2. Support for Whistleblower

- a. Retaliatory acts against whistleblowers who submit reports in good faith shall not be tolerated by Company. An employee who threatens, intimidates, or retaliates against the whistleblower, shall be subjected to disciplinary action, including and up to termination of employment after the observance of due process.
- b. The Company recognizes the troubles, distress, and obstacles that may be faced by a whistleblower; hence, Management will provide the full protection to the whistleblower.
- c. The Company will not tolerate any form of harassment by the alleged perpetrator against the whistleblower and will take appropriate action to protect the whistleblower.

3. False Accusations

- a. If the accusations or claims turn out to be frivolous, false, deceitful, or malicious, then the whistleblower will be subjected to appropriate disciplinary action, up to and including termination of employment after the observance of due process. However, if the report was made in good faith, no administrative proceedings or penalty will be imposed.

 <b>HOUSE OF INVESTMENTS</b>	<b>HUMAN RESOURCES &amp; ADMINISTRATION DEPARTMENT</b> <b>HR POLICY MANUAL</b>	Document No.	HI-AD-11
		Revision No.	003
		Effective Date	April 1, 2024
	<b>Whistleblowing Policy</b>	Last Updated	July 2023
		Page No.	Page 5 of 7
		Documentary Sensitivity	Internal Use

4. Responding to the Disclosure

- a. The administration and handling of the whistleblowing process shall be coursed through the Committee on Decorum and Investigation in coordination with the HI Legal & Compliance Officer. The composition of the committee shall follow the guidelines set forth in the policy on *Administrative Cases and Grievance Procedure*.
- b. The Company shall observe the following timelines:


Acknowledging receipt of complaint	5 working days
Initiate investigation on the whistleblower's concerns	Within a period of ten working (10) days from receipt of the claim or complaint with complete supporting documents
Resolution and Issuance of Decision	60 calendar days upon conclusion of the investigation

5. This policy is consistent with the earlier version. However, should there be any conflict in any of the provisions, this latest version shall prevail.

VII. **Procedures:**

1. The whistleblower discloses information by submitting a duly signed incident report through any of the reporting channels, supported by factual information and relevant documents. Provided, however, that a duly signed incident report shall be dispensed with in cases falling under anonymous reports.
2. Receiving party ensures completeness of documents, records, and forwards documents to the HI Legal and Compliance Department.
3. Matters raised by the whistleblower passes through further examination and validation by the HI Legal and Compliance Officer who will determine if the whistleblower is willing to testify, if the accusation has semblance of validity and/or may be corroborated by other evidence. If deemed necessary, the HI Legal and Compliance Officer, may conduct further investigation or gather additional evidence to support the claim or complaint.
4. HI Legal and Compliance Officer reserves the right to disregard/dismiss any reports that are frivolous, false, deceitful, baseless, patently unmeritorious, ambiguous, or are otherwise simply made with malicious intent to damage the name and reputation of the person complained of.

*See*

 <b>HOUSE OF INVESTMENTS</b>	<b>HUMAN RESOURCES &amp; ADMINISTRATION DEPARTMENT HR POLICY MANUAL</b>	Document No.	HI-AD-11
		Revision No.	003
		Effective Date	April 1, 2024
	<b>Whistleblowing Policy</b>	Last Updated	July 2023
		Page No.	Page 6 of 7
		Documentary Sensitivity	Internal Use

5. In the event that the Whistleblower withdraws his or her report, the investigation shall continue, provided that the evidence gathered is sufficient as determined by the HI Legal and Compliance Officer.
6. If all factors above are present, the guidelines and procedures set forth in the policy on *Administrative Cases and Grievance Procedure* shall be followed.

VIII. **Process Flow** (Annex B)

IX. **Effectivity**

This supersedes all policies, memoranda, and circulars issued related to Whistleblowing policy and this policy becomes effective as of the date of this writing unless superseded by another policy.

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HOUSE OF INVESTMENTS  
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 HR POLICY MANUAL

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 <b>HOUSE OF INVESTMENTS</b>	<b>HUMAN RESOURCES &amp; ADMINISTRATION DEPARTMENT</b> <b>HR POLICY MANUAL</b>	Document No.	HI-AD-11
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Effective Date		April 1, 2024	
Last Updated		July 2023	
Page No.		Page 7 of 7	
Documentary Sensitivity		Internal Use	

**Annex A**

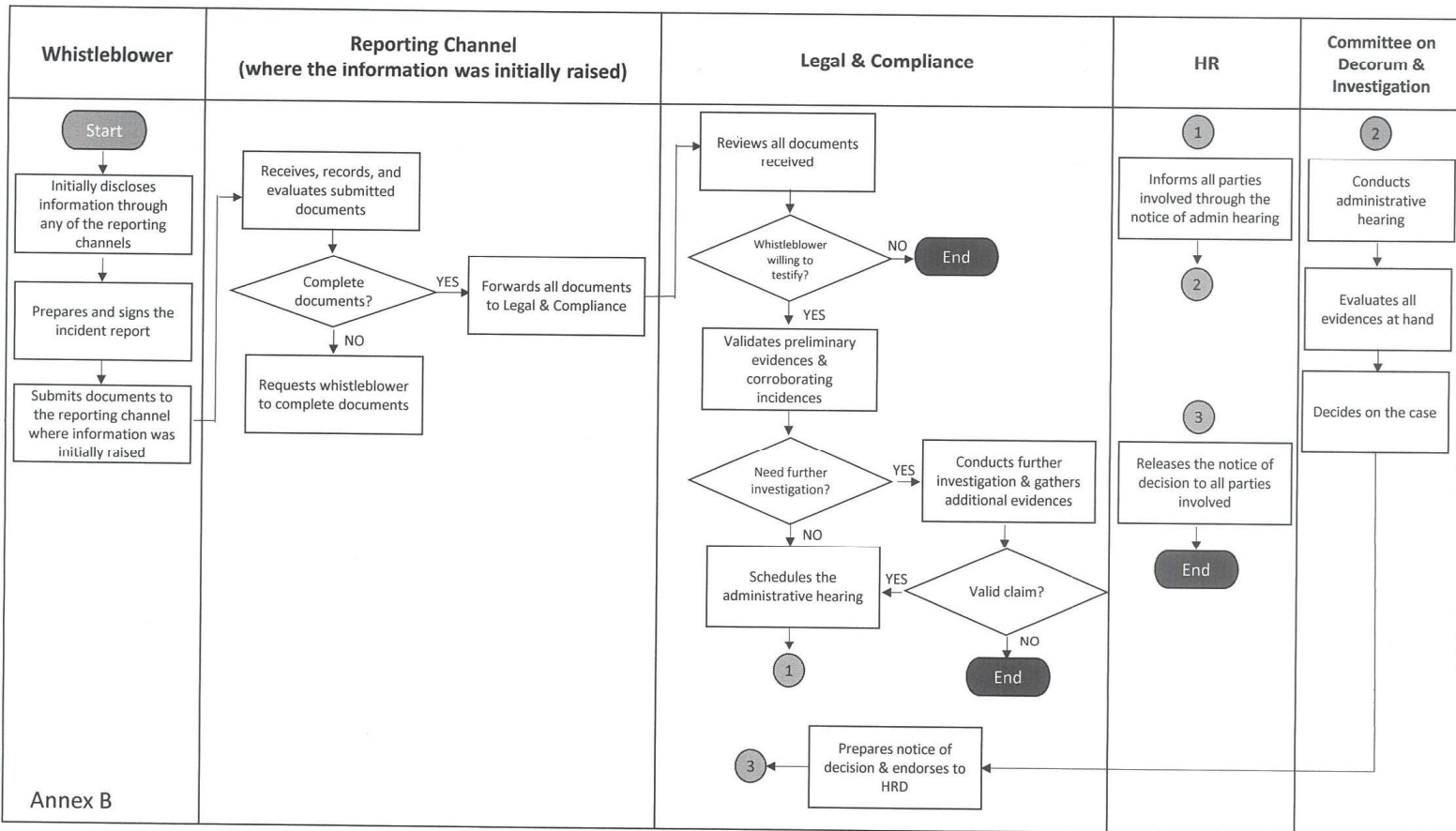
**List of Covered Companies**

1. House of Investments, Inc.
2. HI Cars, Inc.
3. Landev Corporation and Subsidiaries
4. Investments Managers, Inc.
5. RCBC Realty Corporation
6. ATYC, Inc.
7. San Lorenzo Ruiz Investment Holdings and Services, Inc.
8. Tarlac Terra Ventures, Inc.

House of Investments



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Annex B

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