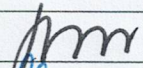
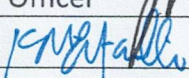
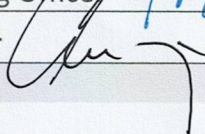


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Reviewed by: Sheila Marie Sepulveda, Chief Human Resources Officer 	
Concurred by: Karlo Marco Estavillo, Chief Operating Officer 	
Approved by: Wolfgang Krueger, Executive Director 	

1. Policy Statement

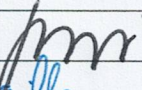
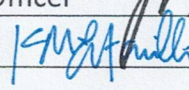
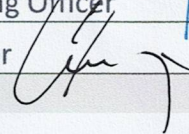
1.1 Shang Properties, Inc. (the "Company") is committed to achieving and maintaining the highest standards of transparency, integrity, and accountability. However, all organizations face the risk of things going wrong from time to time, or of unknowingly harboring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations from occurring or to address them when they occur.

1.2 The company provides clear channels for employees to report any concerns related to unethical or illegal behavior. This includes a confidential reporting system, as well as a process for reporting to Immediate Superior, Department / Division Heads, the Chief Human Resources Officer, Executive Committee, or the Executive Director. However, even the best systems of controls cannot provide absolute safeguards against irregularities. We have the responsibility to investigate and report to appropriate parties, allegations of suspected serious ethical misconduct or improper activities and to take appropriate actions.

2. Objective

2.1 The intended aims of this policy are:

- a. To encourage and facilitate the reporting of concerns related to unethical or illegal behavior in a timely and efficient manner.
- b. To provide assurance to employees and other stakeholders that they can raise concerns without fear of retaliation or negative consequences.
- c. To ensure that all reports are taken seriously and investigated in a fair and impartial manner.
- d. To promote a culture of transparency and accountability within the organization.
- e. To protect the reputation and interests of the organization by addressing concerns promptly and appropriately.

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f. To comply with legal and regulatory requirements to whistleblowing, where applicable.

3. Definition

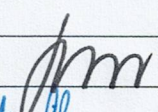
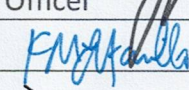
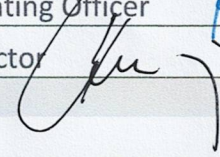
“Whistleblowing” refers to the act of disclosing and reporting of information by an Employee (“Whistleblower”) of any wrongdoings, violations/infractions of any governing laws of the Philippines, Company policies, guidelines, and procedures which they have become aware of or where they reasonably believe that such matters have occurred, or is occurring, or may occur.

Whistleblowing matters include, but are not limited the following matters in relation to the Company:

- a) Violation of the Code of Conduct and Business Ethics Policy of the Company including Conflict of Interest;
- b) Breach of legal or regulatory requirements;
- c) Criminal offenses and breach of civil law;
- d) Malpractice, impropriety or fraud in financial reporting, internal control or other financial matters of the Company;
- e) Endangerment to health and safety of an individual or a property;
- f) Damage caused to SPI property or to the environment;
- g) Acts of bribery and corrupt practices;
- h) Acts of theft;
- i) Gross negligence leading to a material loss or damage;
- j) Sexual harassment;
- k) Discrimination on grounds of race, age, sex or disability;
- l) Improper conduct or unethical behavior that is likely to damage our reputation;
- m) Unauthorized disclosure of confidential information;
- n) Deliberate concealment of any of the above matters.

4. Protection and Confidentiality

The Company will treat all Reports in a confidential manner. The identity of the Employee acting in good faith and with reasonable grounds, in making the Reports will not be divulged without the

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Employee's consent. Employees acting under this Policy are assured of fair treatment and

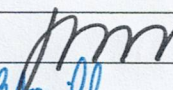
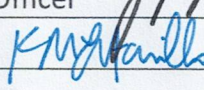
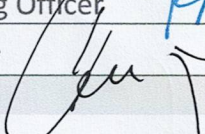
protection against unwarranted disciplinary action even if the Report/s turn out to be unsubstantiated. However, there may be circumstances in which the Company may be legally obliged to reveal the Employee's identity.

5. False Reports Made in Bad Faith

If a Whistleblower makes a false Report maliciously, with an ulterior motive or for personal gain and without reasonable grounds that the information in the Report is accurate or reliable or if the Report is found merely to foment mistrust/distrust, the Company reserves the right to take disciplinary action against the concerned Employee/s.

6. Guidelines and Procedures

- a) To ensure a culture of transparency and accountability, the organization shall establish a confidential whistleblower hotline at **local 339** where employees and stakeholders can report any suspected illegal, unethical, or inappropriate conduct **without fear of retaliation**.
- b) The Whistleblowing Form must be submitted in writing using the Whistleblowing Form (**Annex A**). The name of the Employee must be indicated in the form together with his/her signature. A report from an anonymous source shall not be considered.
- c) The Executive Director may authorize the Chief Human Resources Officer or the Executive Committee **to reply** to the Whistleblower, **conduct investigation, and submit** its findings to the Executive Director at least seven (7) days upon receipt of the report.
- d) The appropriate Management decision to impose disciplinary action/s shall adhere to the Company's Code of Conduct and the provision of the Labor Code of the Philippines.

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This policy supersedes any handbook or policy statements, whether written or in practice. Any subsequent revisions will form part of this policy.

The Company reserves the right to update and/or amend any provision under this Policy as it deems necessary.

***** END OF POLICY *****



For Management Use Only

Date:

Ref No.:

Received by:

**WHISTLEBLOWING FORM
(ANNEX A)****PERSONAL INFORMATION**

Name:

Employee ID:

Job Title:

Div./Dept.:

Mobile No.:

Reported to:

1. Your Disclosure:

Please indicate details of the person(s) involved, nature of allegation, where and when the alleged improper conduct took place. (Use additional sheet if necessary)

2. Additional Information:

Including supporting documents/information such as but not limited to witnesses, or evidence to substantiate your disclosure (if any) to facilitate investigation. You may also attach relevant documents. (Use additional sheets if needed)

I hereby declare that all information given herein are made voluntarily and are true to the best of my knowledge and I will ensure that my participation in this matter will be kept confidential. I do understand that the Company will use the information and material provided throughout the process.

Signed by:**Employee Name and Signature****Date:**

Handwritten initials: KM and jh.

For Management Use Only	
Date:	
Ref No.:	
Received by:	

MANAGEMENT ACTION

3. Action Taken After Investigation:

Include next steps or solutions made by the management.

Conducted by:

Name and Signature

Date:

Approved by:

Executive Director

Date:

KM

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