



# HR POLICY AND PROCEDURE

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**POLICY TITLE:**

Whistleblower Empowerment Policy

**RATIONALE:**

SPAVI is committed to high standards of ethical, moral, and legal business conduct. In line with this commitment, this policy aims to provide an avenue for people to responsibly report malpractices done by SPAVI employees and be assured that they will be protected from retribution. The Whistleblower Policy is intended to encourage responsible reporting and give protection for people when raising reporting questionable business conduct of SPAVI employees.

**OBJECTIVE:**

The policy seeks to achieve the following:

- All reports of malpractices or violations of the Code of Conduct will be immediately attended and investigated carefully.
- Encourage and empower whistleblowers to responsibly report malpractices or violations of the Code of Conduct.

**SCOPE:**

All SPAVI Employees, suppliers, business partners, guests, and other third parties committed to responsible reporting of business malpractices or violations of the Code of Conduct.

**POLICY STATEMENT:**

1. Whistleblower, shall be protected by Management from retribution. The following are safeguards that will guarantee this:
  - Confidentiality – All whistleblower disclosures made via appropriate channels and persons indicated in this policy will be treated as confidential. The Management promises to exhaust all possible means to protect the anonymity of the whistleblower and his/her disclosure except when external legal actions require identification.
  - Protection from Harassment and Retaliation – any harassment or retaliating action made to the whistleblower shall be subject to disciplinary or legal action. This however does not preclude the Management from executing administrative and/or legal actions on people reporting out of malice or personal gain.
2. In case the whistleblower is involved or participated in the commission of an offense, the Management may be willing to provide protection provided all of the following conditions are satisfied:
  - The person does not appear to be the most guilty
  - There is no direct evidence available to substantiate the offense committed except the testimony of the person
  - If an employee has not any time been convicted of any offense punishable with termination of employment
3. Whistleblowers should promptly report actual event directly to HR Division Head. If the need arises, whistleblowers may report to the Chief HR Officer. Whistleblowers are required to identify themselves to take responsibility for the report. In return, the Company guarantees protection from retribution including non-retaliation or harassment.

4. Anonymous reports indicating suspicions of malpractice committed by a SPAVI employee or its other stakeholders will still be entertained and investigated. However, anonymous whistleblowers cannot expect updating/closure of reports and appropriate protection from Management.
5. The HR Division Head or the Chief HR Officer, as the case may be, will initiate an evaluation and submit a preliminary report to appropriate parties including the whistleblower within 5 working days from receipt of the report.
6. If the preliminary report is not to the whistleblower's satisfaction, then he/she has the option to elevate the matter to the General Manager.
7. Written reports shall be made to the HR Division Head:  
 Email: [SPAVI.whistleblower@gmail.com](mailto:SPAVI.whistleblower@gmail.com)  
 (Whistleblowers are encouraged to use your personal email address)

Mobile: 0917 579 1825

Postal address:

SPAVI Corporate Support Office, KM 15 East Service Road corner Marian Road 2, Tindalo St., San Martin de Porres, Paranaque City

Reports via email or postal should be marked Private and Confidential, with the reference "Confidential Disclosure"

**IMPLEMENTATION:**


Orientation

Responsible Person	Responsibility
ManCom Member	1. Cascade of this policy to their respective teams and ensure that everybody understands (For both new and existing employees)
HR Division Head	1. Send a copy of this policy to all employees so that everybody has access 2. Facilitate the posting in the bulletin board as proof of publication 3. Facilitate posting in the company website to inform third parties of our company's effort to ensure high ethical, moral, and legal business conduct at SPAVI

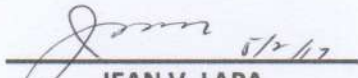
**REFERENCE DOCUMENTS & RECORDS:**

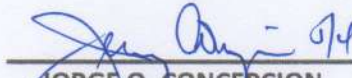
1. Code of Conduct


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