 <p>B.S. Aquino Drive, Bacolod City, Negros Occidental, 6100</p> <p>DR. PABLO O. TORRE MEMORIAL HOSPITAL</p>	Document Code:	DPOTMH-HW-P23
	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	1 of 31
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	THIRD-PARTY RISK MANAGEMENT POLICY

Section 1. Introduction

Riverside Medical Center, Inc. (the "RMCI" or the "Company") recognizes that, from time to time, interaction with Third Parties (as defined below) is essential in efficiently conducting the Company's business. In so doing, the Company's interactions and dealings should always be characterized by honesty, integrity, transparency, and the highest standards of ethics and good behavior. Thus, the Company adopts this Third-Party Risk Management Policy (the "Policy") to reinforce its commitment to the highest ethical standards and best practices of professional conduct in terms of the Company's dealings with Third Parties in the course of its business operations.


Section 2. Purpose and Scope

The purpose of this Policy is to define roles, responsibilities, and processes for assuring Third-Party entities (e.g., vendors, consultants, contractors, service providers, etc.) comply with the Company's internal governance requirements.

The scope of this Policy is to define the processes associated with the management of Third-Party relationships that the Company does business with. It articulates the compliance requirements in relation to dealings and interactions with Third Parties by the Company, its Directors, Employees and Consultants (hereafter, "Company Personnel").

This Policy aims to assist the Company in managing risks associated with Third Parties by:

- Defining the fundamental principles governing the management of Third-Party risks;
- Clarifying Company' expectations of Company Personnel on what they must know and adhere to before making any commitments with Third Parties; and

 <p>B.S. Aquino Drive, Bacolod City, Negros Occidental, 6100</p> <p>DR. PABLO O. TORRE MEMORIAL HOSPITAL</p>	Document Code:	DPOTMH-HW-P23
	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	2 of 31
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	THIRD-PARTY RISK MANAGEMENT POLICY

- Establishing roles and responsibilities of the key stakeholders involved in the management of Third-Party risks.

Adherence to this Policy ensures that Third-Party risks are managed in a holistic and consistent manner that enhances the Company's capability to build and protect value for its stakeholders and advances the broader interests of society as a whole.

Section 3. Applicability

A. This Policy applies to and shall be implemented by all Company Personnel.


B. The scope of this Policy extends across all of the Company's business dealings. Adherence to this Policy will ensure that Company Personnel are compliant with laws; their actions are governed by the highest ethical standards, which in turn will reduce the risk of the Company incurring criminal liability or suffering reputational damage. It is the responsibility of each Company Personnel to be aware of and remain compliant with this Policy.

C. It is the intention of the RMC Board of Directors that a similar policy shall be adopted and implemented by each RMC subsidiary and their respective subsidiaries and the respective Presidents of these companies shall recommend the adoption of this Policy (or a similar policy) to their respective Boards of Director.

Section 4. Definitions

For purposes of this Policy,

(a) **BUSINESS OWNER** – refers to the person or department that has responsibility over the project or transaction that requires the engagement of a Third Party and who has


 <p>B.S. Aquino Drive, Bacolod City, Negros Occidental, 6100</p> <p>DR. PABLO O. TORRE MEMORIAL HOSPITAL</p>	Document Code:	DPOTMH-HW-P23
	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	3 of 31
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	THIRD-PARTY RISK MANAGEMENT POLICY

the authority to direct the engagement, agree to and sign the contract, and is the main point of contact for the Company.

(b.) **EMPLOYEES** - refers to any individual hired by RMCI for salaries and/or benefits provided in regular amounts at stated intervals in exchange for services rendered personally for the Company's business on a regular basis and who does not provide such services as part of an independent business. This includes RMCI's Executive Committee, Management Committee, Middle Managers, Rank & File and Consultants, only for purposes of this Policy, other corporate officers under the Company's By-laws, fixed-term, project-based, part-time employees or Subsidiaries' employees who also work for/serve RMCI (e.g. on seconded basis).

(c.) **GOVERNMENT OFFICIAL** - all officers or employees of a government department, agency, or instrumentality; permitting agencies; customs officials; candidates for political office; and officials of public international organizations (e.g., the Red Cross). This term also includes officers or employees of government-owned or controlled commercial enterprises such as state-owned or controlled universities, airlines, oil companies, health care facilities, or other vendors. The term also includes family members and close associates of such individuals (e.g., it is not permissible to give a lavish gift to the sibling, spouse, or child of a government official if a gift to the latter would be prohibited under this Policy). This term also includes healthcare professionals (HCPs) who are practicing in government hospitals or any department, agency, or instrument of a government, when any of the following instances apply: (i) the HCP has an official decision-making role, (ii) the HCP has responsibility for performing regulatory inspections, government authorizations or licenses, or (iii) the HCP has the capacity to make decisions with the potential to affect the business of the Company or any of its subsidiaries.

(d.) **HIGH RISK THIRD-PARTY** – refers to consultants, contractors, service providers, vendors, etc. whose engagement with the Company is of such frequency, nature, and scales that renders the Company's operation vulnerable should there be breach, violation,


 <p>B.S. Aquino Drive, Bacolod City, Negros Occidental, 6100</p> <p>DR. PABLO O. TORRE MEMORIAL HOSPITAL</p>	Document Code:	DPOTMH-HW-P23
	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	4 of 31
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	THIRD-PARTY RISK MANAGEMENT POLICY

and or abuse of trust on the part of such Third-Party. High Risk Third Parties include but are not limited to:

- those that deal with the most business-critical operations or the most sensitive data of the Company,
- Third Parties to whom the Company depends on to run its operations,
- Third Parties that deal with Government on behalf of the Company and has access to Company's sensitive corporate information or handles its financial transactions and there is high risk of information loss,
- Third Parties that are owned by a Government Official or someone related to a Government Official, Third Parties that have been associated with allegations of improper payments or corruption in the past,
- Third Parties that do not cooperate with the Company's screening process, and
- When a customer/Government Official pressures the Company to retain a particular Third Party.

(e.) **THIRD-PARTY** - an individual, entity, organization and/or its representatives that has existing and/or intended business dealings with the Company. This includes prospective or existing suppliers, contractors, consultants (including, Healthcare Providers), buyers, dealers and customers. This also covers associates (former classmates, co-workers, co-fraternity members, co-members in closed knit associations such as masonry/lodge, etc.) who are also prospective or existing suppliers, contractors, buyers, dealers or customers. This also covers partners in CSR activities, grants, sponsorships, foundations and other similar organizations.

(f.) **THIRD-PARTY DUE DILIGENCE REVIEW** – refers to the act of ensuring and documenting that there is: (i) business reason to engage the Third Party, (ii) selection

 <p>B.S. Aquino Drive, Bacolod City, Negros Occidental, 6100</p> <p>DR. PABLO O. TORRE MEMORIAL HOSPITAL</p>	Document Code:	DPOTMH-HW-P23
	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	5 of 31
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	THIRD-PARTY RISK MANAGEMENT POLICY

process, (iii) background check using the Third-Party Due Diligence Questionnaire and Certification (*See Annex "A"*), including checking whether the Third-Party is on the Company prohibited list (if any), check and resolution of any conflicts of interest, and due diligence is refreshed as appropriate to maintain adequate oversight of Third Parties.


(g.) **THIRD-PARTY RISK ASSESSMENT** – the process by which the Business Owner or the Procurement Department conducts an assessment relative to the engagement of a Third-Party and ensures that the following steps are complied with: (i) conduct of Third-Party Due Diligence Review, (ii) ensure that appropriate Anti-Bribery and Anti-Corruption (ABAC) contractual clauses are added to contracts and purchase orders, (iii) conduct compliance training to Third Parties, and (iv) monitoring of Third Parties and reporting breaches.

(h.) **THIRD-PARTY RISK MANAGEMENT ("TPRM")** - The process by which the Company manages interactions with Third Parties for the purpose of assessing and monitoring the ongoing risk that each Third-Party relationship represents.

Section 5. Detailed Policy Statements – Relationships with Third Parties

a. No indirect payments through Third-Party.

Anti-corruption laws prohibit indirect payments made through a Third-Party, including giving anything of value to a Third-Party while knowing that value will be given to a Government Official for an improper purpose. Therefore, Company Personnel should avoid situations involving Third Parties that might lead to a violation of this Policy.

 <p>B.S. Aquino Drive, Bacolod City, Negros Occidental, 6100</p> <p>DR. PABLO O. TORRE MEMORIAL HOSPITAL</p>	Document Code:	DPOTMH-HW-P23
	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	6 of 31
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	THIRD-PARTY RISK MANAGEMENT POLICY


b. Precautionary measures must be adopted when dealing with Third Parties.

Company Personnel who deal with Third Parties are responsible for taking reasonable precautions to ensure that the Third Parties conduct business ethically and in compliance with this Policy. Such precautions may include:

- conducting an integrity due diligence review of a Third-Party;
- inserting appropriate anti-corruption compliance provisions in the Third-Party's written contract (depending on the circumstances, such provisions could include representations, warranties, covenants, and may require the agent to undergo training);
- requiring the Third-Party to certify that it has not violated and will not violate this Policy and any applicable anti-corruption laws during the course of its/his/her business with the Company; and
- monitoring the reasonableness and legitimacy of the goods and services provided by and the compensation paid to the Third-Party during the engagement.

c. More detailed due diligence and pre-approval of Company's Compliance Officer required when dealing with High Risk Third Parties.


Company Personnel retaining High Risk Third Parties, including Third Parties that will be representing the Company before governmental entities must conduct a more detailed due diligence and must discuss the engagement with and seek prior written approval from the Company's Compliance Officer prior to hiring the High Risk Third-Party. Any doubts regarding the scope of appropriate due diligence efforts in this regard should be resolved by contacting and consulting with the Company's Compliance Officer and President & CEO.

 <p>B.S. Aquino Drive, Bacolod City, Negros Occidental, 6100</p> <p>DR. PABLO O. TORRE MEMORIAL HOSPITAL</p>	Document Code:	DPOTMH-HW-P23
	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	7 of 31
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	THIRD-PARTY RISK MANAGEMENT POLICY

d. Awareness of red flags when dealing with Third Parties.

In addition, once a Third-Party is engaged, Company Personnel who deal with Third Parties must always be aware of potential red flags. Red flags are certain actions or facts which should alert a company that there is a possibility of improper conduct by a Third-Party. A red flag does not mean that something illegal has happened, but rather that further investigation is necessary. Red flags are highly fact-dependent, but some examples of red flags are:

- Unusual or excessive payment requests, such as requests for over-invoicing, up-front payments, ill-defined or last-minute payments, success fees, unusual commissions, or mid-stream compensation payments;
- Requests for payments to an account in a country other than where the Third-Party is located or is working on behalf of the Company;
- Requests for payment to another Third-Party, to a numbered account, or in cash or other untraceable funds;
- Requests for political or charitable contributions;
- Where the Third-Party is related to a Government Official or has a close personal or business relationship with a Government Official;
- Any refusal or hesitancy by a third party to disclose its owners, partners, or principals;
- The Third-Party uses holding companies or other methods to obscure its ownership, without adequate business justification;
- The Third-Party expresses a desire to keep his representation of the Company or the terms of his retention secret; or

 <p>B.S. Aquino Drive, Bacolod City, Negros Occidental, 6100</p> <p>DR. PABLO O. TORRE MEMORIAL HOSPITAL</p>	Document Code:	DPOTMH-HW-P23
	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	8 of 31
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	THIRD-PARTY RISK MANAGEMENT POLICY

- The Third-Party has little experience in the industry but claims to “know the right people.”

e. Immediate reporting of potential improper conduct by Third-Party.

If Company Personnel have reason to suspect that a Third-Party is engaging in potentially improper conduct, they shall report the case to Company’s Compliance Officer immediately. The Company shall conduct an investigation and stop further payments to the Third-Party if the Company’s suspicions are verified through the investigation.

Section 6. Stakeholders in the Management of Third-Party Risks and Their Roles and Responsibilities

Stakeholder name	Information on role/ responsibility
Business Owner	<ul style="list-style-type: none"> • Holds relationship with Third Parties and is responsible for the business impact of the transaction with Third Parties, other than those falling within the jurisdiction and authority of the Procurement Department. • Assumes and owns any risk(s) identified with the Third Party. • Carry out tasks such as initiating the Third-Party Risk Assessment process, providing data for information or




DR. PABLO O. TORRE
MEMORIAL HOSPITAL

B.S. Aquino Drive,
Bacolod City,
Negros Occidental,
6100

Document Code:	DPOTMH-HW-P23
Effective Date:	08-15-2021
Document Type:	CORPORATE GOVERNANCE POLICY
Page Number:	9 of 31
Department/Section:	COMPLIANCE DEPARTMENT
Document Title:	THIRD-PARTY RISK MANAGEMENT POLICY


	queries, lead remediation activities to address identified risks, and liaising with relevant parties to ensure that specific contract clauses required are included in the contract with the Third-Party.
Procurement Department	<ul style="list-style-type: none"> • Holds relationship with Third Parties and is responsible for the business impact of the transaction with Third Parties falling within the scope of its authority. • Assumes and owns any risk(s) identified with the Third Party. • Carry out tasks such as initiating the Third-Party Risk Assessment process. • Ensures that relevant provisions of this Policy are incorporated and taken into account in bidding procedures or tender for procurement.
Compliance Office	<ul style="list-style-type: none"> • Defines specific risk policies in their area of responsibility. • Liaises with Business Owners and the Procurement Department to support and ensure the proper functioning of TPRM, support in managing Third-Party risk, oversee the Third-Party Risk Assessment procedure for their risk area and ensure

 <p>B.S. Aquino Drive, Bacolod City, Negros Occidental, 6100</p> <p>DR. PABLO O. TORRE MEMORIAL HOSPITAL</p>	Document Code:	DPOTMH-HW-P23
	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	10 of 31
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	THIRD-PARTY RISK MANAGEMENT POLICY


	<p>that relevant compliance standards and requirements are contained in the Policy.</p> <ul style="list-style-type: none"> Provides ABAC training to and obtain Third-Party Compliance Affirmation on an annual basis (<i>See Annex "B"</i>) to Third Parties.
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Section 7. Principles for a Third-Party Management Policy

Principles	Details/ more information on the principles
Maintain risks at an acceptable level	<ul style="list-style-type: none"> Work with Third Parties who conduct business in a manner that is consistent with the Company's values and standards. A robust and risk-based assessment process should be in place to ensure that Third Parties operate to the same standards as the Company. In this way, the Company maintains risks at an acceptable level.
Business owns the risk	<ul style="list-style-type: none"> Business Owner owns and manages the risks identified with the Third Party. Compliance with the Third Party Risk Assessment procedure supports the Business Owner in this process by identifying, assessing, remediating and monitoring risks.

 <p>B.S. Aquino Drive, Bacolod City, Negros Occidental, 6100</p> <p>DR. PABLO O. TORRE MEMORIAL HOSPITAL</p>	Document Code:	DPOTMH-HW-P23
	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	11 of 31
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	THIRD-PARTY RISK MANAGEMENT POLICY

Use the Third Party Risk Assessment procedure	<ul style="list-style-type: none"> - The Third Party Risk Assessment procedure enables Third Party risk assessments to be managed through a risk-based approach in a single, mandatory process and system. The framework is scalable and flexible to enable the inclusion of additional risks over time. - Business Owner would initiate the Third Party Risk Assessment procedure and the outcome of the risk assessment determines whether a commitment can be made or if additional steps (e.g. remediation) are first required with the Third Party.
No Assessment, no contract	<ul style="list-style-type: none"> - No transaction with the Third Party can be made before the risk assessment is completed. - If a "No-Go" (or Red flag/unacceptable/unmitigatable) criterion is identified during the risk assessment, no contract with the Third Party will be possible.
Remain vigilant	<ul style="list-style-type: none"> - Third Parties are monitored on an ongoing basis throughout the entire relationship through Third Party audits and subsequent remediation actions, if applicable. - Effective monitoring also requires the Business Owner to share with the stakeholders any relevant information that they become aware of which may have an impact on the risk classification of the Third Party.

 <p>B.S. Aquino Drive, Bacolod City, Negros Occidental, 6100</p> <p>DR. PABLO O. TORRE MEMORIAL HOSPITAL</p>	Document Code:	DPOTMH-HW-P23
	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	12 of 31
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	THIRD-PARTY RISK MANAGEMENT POLICY

	- A re-assessment of the Third Party is triggered every three years at the latest - or earlier in certain circumstances (e.g., where the contract is extended or renewed or the nature of our relationship with the Third Party changes significantly). For High Risk Third Parties, re-assessment should be made on an annual basis.
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Section 8. Implementation of TRM

Third Party Risk Assessment requires the following processes:

- ✓ A. VENDOR SELECTION – procurement process through bidding procedures and price comparison.
- ✓ B. VENDOR SCREENING – Evaluation of Third-Party will be undertaken through: (i) requiring the filling up and submission of the Company's Third-Party Due Diligence Questionnaire and Certification (*See Annex "A"*), and (ii) risk assessment, by assigning the appropriate risk rating (low, normal, high). Based on the results of the due diligence / risk assessment, the Company will determine whether to engage in a business relationship with the Third Party.

The risk assessment will take the following into consideration:

- The information asset(s) being accessed.
- Type of access needed, such as physical access to offices, logical access to databases and information systems.
- Value, sensitivity, and criticality of the information.

 <p>B.S. Aquino Drive, Bacolod City, Negros Occidental, 6100</p> <p>DR. PABLO O. TORRE MEMORIAL HOSPITAL</p>	Document Code:	DPOTMH-HW-P23
	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	13 of 31
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	THIRD-PARTY RISK MANAGEMENT POLICY

- Accessibility needs of the Third-Party.
- Legal and regulatory requirements and other contractual obligations.
- Fair market value for services to be rendered.


C. CONTRACTING – Third-Party entities will not be engaged by the Company until:

- The due diligence / risk assessment has been completed and the information has been analyzed to determine if risks are acceptable.
- The remediation of all risks (findings) that are determined to be unacceptable.
- Completion of background checks.
- Third Party personnel have read the organization's relevant policies and procedures and signed the Third-Party Compliance Affirmation (*See Annex "B"*).

D. ABAC TRAINING AND CERTIFICATION UPON ONBOARDING

Business owners must familiarize themselves with this Policy. They shall also be trained in line with the Company-wide compliance training curriculum, if applicable. If required, additional training to High Risk Third Parties, must be undertaken by the Compliance Department.

Training must be provided to Third Parties for them to familiarize with the applicable policies and procedures.

 <p>B.S. Aquino Drive, Bacolod City, Negros Occidental, 6100</p> <p>DR. PABLO O. TORRE MEMORIAL HOSPITAL</p>	Document Code:	DPOTMH-HW-P23
	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	14 of 31
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	THIRD-PARTY RISK MANAGEMENT POLICY

E. REGULAR MONITORING

Business Owners, in coordination with the Compliance Department, will establish and carry out the monitoring of Third Parties by using surveys, questionnaires and inspections to review the compliance of Third Parties on an ongoing basis. Year-to-year comparisons can flag potential lapses in security control environments.

Breaches of the Company policies and guidelines or local laws will result in remedial, corrective or disciplinary actions up to and including termination of engagement or business relationship with Third Parties. Actual or suspected incidents of misconduct should be reported. The Company guarantees non-retaliation and confidentiality, to the extent legally possible, for good-faith reports of such breaches.


All Company Personnel are encouraged to report suspected violations of law, rules and regulations related to their work. This includes reporting misconduct by other Company Personnel and with whom they do business. The Company is committed to non-retaliation and will maintain, as appropriate, confidentiality and anonymity with respect to all disclosures.

F. REFRESH DUE DILIGENCE UPON RENEWAL OF CONTRACT OR DUE DILIGENCE EXPIRY DATE, WHICHEVER IS EARLIER.

G. RETENTION OF RECORDS AND DOCUMENTS

All engagements of Third Parties must be fully documented through the Third-Party Engagement Documentation Form (*attached herein as Annex "C"*). The relevant documentation must include the following:

- How and from whom the need for acquisition originated;
- Approval by which the purchase and/or engagement was authorized;
- How the cost or compensation was determined and approved;

 <p>B.S. Aquino Drive, Bacolod City, Negros Occidental, 6100</p> <p>DR. PABLO O. TORRE MEMORIAL HOSPITAL</p>	Document Code:	DPOTMH-HW-P23
	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	15 of 31
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	THIRD-PARTY RISK MANAGEMENT POLICY

- Business justification for selecting the prospective Third-Party;
- The expertise and resources that the prospective Third-Party brings to the role that they propose to undertake;
- Third-Party Risk Assessment and due diligence report and background checks shall be documented thoroughly by the Business Owners and the Legal and Compliance Department; and
- All records for proof of supply or performance of the goods/services by the Third-Party.


The Business Owner shall maintain all records pertinent to the engagement of the Third-Party as enumerated above and such other pertinent supporting documentation for the entire duration of the engagement and for a period of no less than five (5) years from the termination of the engagement.

Section 9. Consequences of Violations

Any Company Personnel who fail to comply with this Policy shall be, upon notice and hearing, subjected to penalties and sanctions as may be determined by the Human Resource Division Officer, Compliance Officer, and the Company President & CEO. Third Parties found to have defied this Policy shall also be penalized.

Section 10. Effectivity

This Policy shall take effect immediately. All existing policies, rules, system practices, and related implementing guidelines concerning the same matters covered by this Policy are deemed superseded. In the event of any inconsistency between this Policy and guidelines contained herein and the terms of other existing policies, rules, system

 <p>B.S. Aquino Drive, Bacolod City, Negros Occidental, 6100</p> <p>DR. PABLO O. TORRE MEMORIAL HOSPITAL</p>	Document Code:	DPOTMH-HW-P23
	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	16 of 31
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	THIRD-PARTY RISK MANAGEMENT POLICY

practices and related implementing guidelines, the Policy and guidelines contained herein shall prevail.

This policy, the other Corporate Governance Policies, and the Code of Ethics and Business Conduct have supplemental application to each other.

Section 11. Approval, Amendment or Alteration of this Policy

This Policy has been approved and adopted by the Board of Directors of the Company. The Compliance Department and the Company's Board of Directors, Executive Committee, Management Committee, and Middle Managers have the overall responsibility for implementation, monitoring and periodic review of this Policy.

This Policy shall not be amended, altered or varied unless such amendment, alteration or variation shall have been approved by resolutions of the Board of Directors.




DR. PABLO O. TORRE
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B.S. Aquino Drive,
Bacolod City,
Negros Occidental,
6100

Document Code:	DPOTMH-HW-P23
Effective Date:	08-15-2021
Document Type:	CORPORATE GOVERNANCE POLICY
Page Number:	17 of 31
Department/Section:	COMPLIANCE DEPARTMENT
Document Title:	THIRD-PARTY RISK MANAGEMENT POLICY

APPROVAL:

	Name/Title	Signature	Date
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Verified:	NANCY B. HIZON, MS Psych, FPCHA Human Resources Division Officer		8/3/2021
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	SOCORRO VICTORIA L. DE LEON, CPA, MBA, PhD, FPCHA Vice President- Chief Operating Officer		08/24/21
Approval:	GENESIS GOLDI D. GOLINGAN President and CEO		9/11/2021

 <p>B.S. Aquino Drive, Bacolod City, Negros Occidental, 6100</p> <p>DR. PABLO O. TORRE MEMORIAL HOSPITAL</p>	Document Code:	DPOTMH-HW-P23
	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	18 of 31
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	THIRD-PARTY RISK MANAGEMENT POLICY

DISSEMINATION:

Communicator's Bulletin


Weekly Management Meeting

Annual Reorientation of Employees

Pre-board and Onboard Orientation

REFERENCE:

Adopted with modifications from the Metro Pacific Hospital Holdings, Inc. (MPHHI) – Corporate Governance Policy: Third-Party Risk Management Policy

 <p>B.S. Aquino Drive, Bacolod City, Negros Occidental, 6100</p> <p>DR. PABLO O. TORRE MEMORIAL HOSPITAL</p>	Document Code:	DPOTMH-HW-P23
	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	19 of 31
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	THIRD-PARTY RISK MANAGEMENT POLICY

ANNEX A:

THIRD-PARTY DUE DILIGENCE QUESTIONNAIRE AND CERTIFICATION

Dear [Third-Party Name]

As you should be aware, RIVERSIDE MEDICAL CENTER, INC. (the "Company") has set high corporate governance standards for itself and takes pride in knowing and understanding its customers and vendors. As part of the process of empaneling new vendors and continuing our relationship with existing vendors, we follow due diligence procedures consistent with our Company's standards of ethics and corporate governance.

To that end, you are requested to respond to the requests contained below within this form and to complete the certification enclosed with this letter prior to your engagement with the Company. Completion of this form and certification is a condition of your engagement with the Company.

We enclose a copy of the Company's Anti-Bribery & Anti-Corruption Policy, Gifts & Hospitality Policy, and Whistleblowing Policy for your reference (collectively, "Compliance Policies"), which set out the policies and requirements for ethical conduct of all Company stakeholders, including you.


In the meantime, if you have any questions, please get in touch with me through email or phone.

Thank you in advance for your timely response and your cooperation with this important initiative. We look forward to continuing our business relationship.

Regard,

Contact _____

Email _____

 <p>B.S. Aquino Drive, Bacolod City, Negros Occidental, 6100</p> <p>DR. PABLO O. TORRE MEMORIAL HOSPITAL</p>	Document Code:	DPOTMH-HW-P23
	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	20 of 31
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	THIRD-PARTY RISK MANAGEMENT POLICY

THIRD PARTY DUE DILIGENCE QUESTIONNAIRE


1. VENDOR DETAILS

Please provide the details below.

a)	Vendor Name (Legal Entity Name)	
b)	Registered Office Address	
c)	Corporate Office Address	
d)	Type of Service/product offered	
e)	Phone/Fax Number	
f)	Email Address	
g)	Name of Managing Director/Proprietor/Partner	
h)	Contact number of Managing Director/Proprietor/Partner	
i)	Email Address of Managing Director/Proprietor/Partner	
j)	Name of the Single Point of Contact ("SPOC")	
k)	Contact number of the SPOC	
m)	Email Address of the SPOC	

2. LEGAL REGISTRATIONS

Please provide the information below. Please provide copies of (a) and (f). In the case of (a), please provide certified copies.

 <p>B.S. Aquino Drive, Bacolod City, Negros Occidental, 6100</p> <p>DR. PABLO O. TORRE MEMORIAL HOSPITAL</p>	Document Code:	DPOTMH-HW-P23
	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	21 of 31
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	THIRD-PARTY RISK MANAGEMENT POLICY


a)	Certificate of Incorporation, partnership agreement, or other comparable foundational document depending on structure of entity.	
b)	Tax Identification Number	
c)	BIR Registration Number	
d)	SSS Registration Number	
e)	PhilHealth Registration Number	
f)	Audited Financial Statements (last two years)	

3. COMPLIANCE QUESTIONS


All questions in Section 3 must be answered as “yes” or “no” and information provided as requested¹. No question in this section may be answered “NA”.

a)	Please provide details of the ownership structure of the Vendor, including the identities of the ultimate beneficial owners.	
b)	Please indicate whether any current or former Government Official or his/her relative owns, directly or indirectly, any stake in or has any beneficial interest in the Vendor. If yes, please provide the name of the individual, the size and nature of the individual's stake in the Vendor, and describe the individual's role/former role as a Government Official.	


¹ If preferred, responses to the questions in this section may be provided in a separate written document.

 <p>B.S. Aquino Drive, Bacolod City, Negros Occidental, 6100</p> <p>DR. PABLO O. TORRE MEMORIAL HOSPITAL</p>	Document Code:	DPOTMH-HW-P23
	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	22 of 31
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	THIRD-PARTY RISK MANAGEMENT POLICY

c)	Please indicate whether any of the Vendor's officers, directors, or employees is a current or former Government Official. If yes, please provide the name of the individual, the individual's position within the Company, and describe the individual's role/former role as a Government Official.	
d)	Please indicate whether the Vendor, its officers, directors, or agents have been the subject of any regulatory or criminal investigation, inquiry, or proceedings within the past 5 years. If yes, please describe.	
e)	Please indicate whether the Vendor, its officers, directors, or employees have been the subject of any internal or external allegations relating to bribery, corruption, fraud, or money laundering within the past 5 years. If yes, please describe.	
f)	<p>Please indicate whether the Vendor has in place any of the following and, if so, please indicate whether such documents are distributed to the Vendor's employees and provide copies of the same:</p> <ul style="list-style-type: none"> a. A written code of ethics, code of conduct, or similar; b. A written anti-bribery policy; c. A written whistleblower policy; d. A written gift and entertainment policy. 	

 <p>B.S. Aquino Drive, Bacolod City, Negros Occidental, 6100</p> <p>DR. PABLO O. TORRE MEMORIAL HOSPITAL</p>	Document Code:	DPOTMH-HW-P23
	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	23 of 31
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	THIRD-PARTY RISK MANAGEMENT POLICY

g)	How many times has the Vendor conducted anti-corruption training for employees within the past year?	
h)	Does the Vendor have in place an internal or external audit function? If yes, does the audit function include anti-corruption monitoring (e.g., periodic review of expenses for potential bribery issues)?	
i)	Does the Vendor maintain a petty cash box or account? Does the Vendor have written policies with respect to the use of petty cash? If yes, please provide copies and indicate whether such policies are distributed to the Vendor's employees.	
j)	Does the Vendor intend to use any sub-contractors in connection with the services to be provided to the Company? If yes, please identify that sub-contractor.	
k)	Does the Vendor offer meals, entertainment or gifts to Government Officials other than de minimis items such as branded pens, coffee, etc.?	

 <p>B.S. Aquino Drive, Bacolod City, Negros Occidental, 6100</p> <p>DR. PABLO O. TORRE MEMORIAL HOSPITAL</p>	Document Code:	DPOTMH-HW-P23
	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	24 of 31
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	THIRD-PARTY RISK MANAGEMENT POLICY


l)	In the last 5 years, has the Vendor appeared on, employed any individual who appeared on, or done business with any entity or individual who appeared on any economic sanctions lists maintained by the government of India, or the United States, or the United Kingdom, or the European Union, or other applicable regulator?	
m)	Does the Vendor engage in any business in, or with parties located in, Syria, Cuba, Sudan, the Crimea Region of Ukraine, Iran, or North Korea?	

4. REFERENCES

a)	Attach your list of top 5 Clients and provide the following information	
b)	Number of years in Service	
c)	Name	
d)	Address	
e)	Contact Person	
f)	Contact Number Email	

Note:

1. All information in the form is to be provided. All questions must be answered yes or no with explanation, provided, or if answered "NA," vendor must provide explanation as to why the question is not applicable to vendor's services.
2. While filling out the form, the Vendor is required to provide accurate and factual information. If subsequently it is determined by the Company that any information furnished was inaccurate or


 <p>B.S. Aquino Drive, Bacolod City, Negros Occidental, 6100</p> <p>DR. PABLO O. TORRE MEMORIAL HOSPITAL</p>	Document Code:	DPOTMH-HW-P23
	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	25 of 31
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	THIRD-PARTY RISK MANAGEMENT POLICY

any information was suppressed, the Company reserves the right to terminate the relationship with the vendor immediately.

3. If the form is not properly filled out or the required documents are not attached, the Company reserves the right to not proceed with any business transactions with the vendor.

Defined Terms:

“Government Official” means all officers or employees of a government department, agency, or instrumentality; permitting agencies; customs officials; candidates for political office; and officials of public international organizations (e.g., the Red Cross). This term also includes officers or employees of government-owned or controlled commercial enterprises such as state-owned or controlled universities, airlines, oil companies, health care facilities, or other vendors. The term also includes family members and close associates of such individuals (e.g., it is not permissible to give a lavish gift to the sibling, spouse, or child of a government official if a gift to the latter would be prohibited under this Policy). This term also includes healthcare professionals (HCPs) who are practicing in government hospitals or any department, agency, or instrument of a government, when any of the following instances apply: (i) the HCP has an official decision-making role, (ii) the HCP has responsibility for performing regulatory inspections, government authorizations or licenses, or (iii) the HCP has the capacity to make decisions with the potential to affect the business of the Company or any of its subsidiaries.

 <p>B.S. Aquino Drive, Bacolod City, Negros Occidental, 6100</p> <p>DR. PABLO O. TORRE MEMORIAL HOSPITAL</p>	Document Code:	DPOTMH-HW-P23
	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	26 of 31
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	THIRD-PARTY RISK MANAGEMENT POLICY

CERTIFICATION

I, [Authorized officer], declare on behalf of [Vendor Name], having its principal /registered office at [complete address], that the information provided in this form is correct and accurate to the best of my belief and knowledge.

I/we undertake to update RIVERSIDE MEDICAL CENTER INC. (the "Company") of any changes in the information provided above.

Furthermore, by signing this Declaration, [Vendor Name] undertakes to comply in connection with the provision of services to the Company with all:

- (i) applicable laws and regulations, including but not limited to the US Foreign Corrupt Practices Act, and all applicable laws related to bribery and corruption, and
- (ii) the Company's Anti-Bribery & Anti-Corruption Policy, Gifts & Hospitality Policy, and Whistleblowing Policy.

For (Name of legal entity)


By (Title)

Place

Date

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	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	27 of 31
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	THIRD-PARTY RISK MANAGEMENT POLICY


ANNEX B:

THIRD-PARTY COMPLIANCE AFFIRMATION

I, [Name of the authorized representative], the authorized representative of and on behalf of [Name of the vendor / third party], confirm the following:

- a) I and/or my company (herein referred to as "we") understand and agree to abide by RIVERSIDE MEDICAL CENTER, INC.'s (the "Company") Anti-Bribery & Anti-Corruption Policy, Gifts & Hospitality Policy, and Whistleblowing Policy (collectively, the "Compliance Policies").
- b) We understand the requirements and responsibilities in relation to the Compliance Policies and applicable regulations and agree to abide by them.
- c) We have not paid, offered or promised to pay money or anything of value, on behalf of the Company, to:
 1. Any Government Official (as defined in the Compliance Policies), to influence that Government Official to secure an improper business advantage for the Company; and
 2. Any private entity or individual to influence that entity/individual to carry out any activity to secure an improper business advantage for the Company.
- d) We have not accepted or agreed to receive/ accept money or anything of value on behalf of the Company in exchange for any improper performance on our part to secure an improper advantage for us or any entity/individual connected to us.
- e) We have not undertaken any activity, on behalf of the Company or by our own accord that would cause the Company to violate any applicable anti-bribery, anti-corruption, or other compliance-related laws as detailed in the Compliance Policies.
- f) We understand that any violation of the Compliance Policies could be regarded as serious misconduct and may result in termination of contract or initiation of legal action against us.

(Signature page follows.)

 <p>B.S. Aquino Drive, Bacolod City, Negros Occidental, 6100</p> <p>DR. PABLO O. TORRE MEMORIAL HOSPITAL</p>	Document Code:	DPOTMH-HW-P23
	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	28 of 31
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	THIRD-PARTY RISK MANAGEMENT POLICY


Signed:

Name:

Designation:

Authorized representative of:


Date:

 <p>B.S. Aquino Drive, Bacolod City, Negros Occidental, 6100</p> <p>DR. PABLO O. TORRE MEMORIAL HOSPITAL</p>	Document Code:	DPOTMH-HW-P23
	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	29 of 31
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	THIRD-PARTY RISK MANAGEMENT POLICY

ANNEX C:

THIRD-PARTY ENGAGEMENT DOCUMENTATION FORM

Third-Party Engagement Documentation Form			
THIRD PARTY INFORMATION			
Name:			
Company Affiliated with:		Company Address:	
Country:		Business Sector:	
Phone No:		Email Address:	
HOW AND FROM WHOM THE NEED FOR ACQUISITION/ENGAGEMENT ORIGINATED			
APPROVAL BY WHICH THE PURCHASE/ENGAGEMENT WAS AUTHORIZED			
HOW THE COST OR COMPENSATION WAS DETERMINED OR APPROVED			
Cost / Compensation	Basis	Approver	
BUSINESS JUSTIFICATION FOR SELECTING THE PROSPECTIVE THIRD PARTY/VENDOR			
EXPERTISE AND RESOURCES THAT THE PROSPECTIVE THIRD PARTY BRINGS TO THE ROLE THEY PROPOSE TO UNDERTAKE			

 <p>B.S. Aquino Drive, Bacolod City, Negros Occidental, 6100</p> <p>DR. PABLO O. TORRE MEMORIAL HOSPITAL</p>	Document Code:	DPOTMH-HW-P23
	Effective Date:	08-15-2021
	Document Type:	CORPORATE GOVERNANCE POLICY
	Page Number:	30 of 31
	Department/Section:	COMPLIANCE DEPARTMENT
	Document Title:	THIRD-PARTY RISK MANAGEMENT POLICY

Expertise		Resources
RISKS ASSOCIATED WITH THE THIRD PARTY		
Risks Identified with the Engagement	Level of Risk Impact	Mitigating Measures
DECISION		
<p>_____ For Further Investigation _____ Approved _____ "No Go" [Remarks*: _____]</p> <p style="text-align: right;">* Red Flag / Unacceptable / Unmitigable</p>		
SIGNATORIES		
Prepared by:	Reviewed by:	Approved by:
Name: _____	Name: _____	Name: _____
Designation: _____	Designation: _____	Designation: _____
Date: _____	Date: _____	Date: _____