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	Revision Number:	00
	Effective Date:	06-15-2020
	Document Type:	Policy
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	Department/Section:	Employee Relation/Labor Relation
	Document Title:	WHISTLE-BLOWING POLICY

PURPOSE:

The purpose of formulating the policy is to increase the awareness of maintaining internal corporate justice and regard this as a kind of internal control mechanism and to provide the employees of the company with reporting channels and guidance on whistle-blowing.

LEVEL:

Corporate Human Resources Officer, Client Relations & Communications Manager, Middle Managers, and ER/LR Manager

DEFINITION OF TERMS:

Whistle-blowing. A situation where an employee decides to report serious concerns about any suspected misconduct, malpractice or irregularity which he/she has become aware of or genuinely suspects that the Riverside Medical Center, Inc. (RMCI) has been or may become involved in.

POLICY:

This policy is intended to assist individual employees (permanent or probationary employees) to disclose information relevant to suspected misconduct, malpractice or irregularity through a confidential reporting channel. It is not designed to further any personal disputes, question financial or business decisions taken by the Riverside Medical Center, Inc. (RMCI) nor should it be used to reconsider any staff matters which have been addressed under the grievance procedure already in place. Whistle-blowing matters may include but are not confined to:

1. Malpractice, impropriety or fraud relating to internal controls, accounting, auditing and financial matters



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2. Violation of the rules and regulations of Riverside Medical Center, Inc. (RMCI)
3. Improper conduct or unethical behavior likely to prejudice the standing of Riverside Medical Center, Inc. (RMCI)
4. Breach of legal or regulatory requirements
5. Criminal offenses, breach of civil law and miscarriage of justice
6. Endangerment of the health and safety of an individual
7. Damage caused to the environment
8. Deliberate concealment of any of the above

FALSE REPORTS

If an employee makes a false report maliciously, with an ulterior motive, or for personal gain, the Company reserves the right to take appropriate actions against the employee to recover any loss or damage as a result of the false report. In particular, the employee may face disciplinary action, including dismissal, where appropriate.

ANONYMOUS REPORTS

As the Company takes reporting of misconducts, malpractices, and irregularities seriously and wants to conduct warranted investigations of both potential and actual violations, it is preferred that these reports are not made anonymously. However, it is recognized that for any number of reasons, employees may not feel comfortable reporting potential violations directly to the ER/LR Manager. In these cases, anonymous reports, subjected to verification, may be submitted to the Client Relations & Communications Manager.

RECORD RETENTION

Records shall be kept for all recorded misconducts, malpractices, and irregularities by the relevant parties in the company. In the event a reported irregularity leads to an investigation, the party responsible for leading/conducting the investigation shall ensure that all relevant information relating to the case is retained, including details of corrective action taken for a period not exceeding six years (or whatever other period may be specified by any relevant legislation).



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APPROVAL, IMPLEMENTATION AND REVIEW OF POLICY

This policy has been approved and adopted by the Company. The Employees' and Labor Relation Section has the overall responsibility for implementation, monitoring and periodic review of this Policy.

MATRIX FOR WHISTLE-BLOWING INVESTIGATION COMMITTEE

Complainee	Investigation Committee Members
RANK & FILE	1. Section/Department Head 2. ER/LR Manager 3. RMCI Corporate Legal Counsel
SUPERVISORY / MANAGERIAL	1. ManCom 2. RMCI Corporate Legal Counsel
DIVISION HEAD	1. MPHHI Group - HR 2. President & CEO 3. Corporate HR Officer 4. RMCI Corporate Legal Counsel

*Note: The matrix above is for internal investigation; External investigation may be referred to the External Auditor or form the subject of an independent inquiry as deemed appropriate by the management.
(Please refer to the Investigation Procedure under the Whistle-blowing Policy)*



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APPROVAL:

	Name/Title	Signature	Date
Prepared by:	KARLOTA L. SUMUGAT Acting OD Specialist		06-03-20
	RONEL JAY Y. FERRER Acting ER/LR Supervisor		6-4-20
	GERONIMO TEOFISTO P. ESTRELLA Client Relations & Communications Manager		6/5/2020
Reviewed:	DENNIS C. ESCALONA, MN, FPSQua Quality Assurance Supervisor		06/05/2020
Recommending Approval:	NANCY B. HIZON, MS Psych, FPCHA Corporate Human Resource Officer		6/9/2020
	HENRY F. ALAVAREN, MD, FPSMID Total Quality Division Officer		6/9/20
Approved:	GENESIS GOLDI D. GOLINGAN President and CEO		12/23/2020



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PROCEDURE:

1. Reporting Channel for the Company


Employee who has a legitimate malpractice concern can raise the matter directly with the Employees' and Labor Relations (ER/LR) Manager. The ER/LR Manager will review the complaint and decide how the investigation should proceed. Depending on the circumstances, the ER/LR may refer the matter to the Whistle-blowing Investigation Committee in coordination with the Corporate Human Resource Officer concerning to the policy statements above.

2. Reporting Format and Supporting Documentation

Disclosures can be made in writing by using the standard form (Whistleblower Report Form). While the Company does not expect the employee to have absolute proof or evidence of the misconducts, malpractices or irregularities reported, the report should show reasons for the concerns and full disclosure of any relevant details and supporting documentation.

The disclosure can be passed to the ER/LR Manager in a sealed envelope clearly marked "Strictly Private and Confidential – to be opened by Addressee Only" to ensure confidentiality, or to the Client Relations & Communications Manager through sending emails to clientrelationsriverside@gmail.com. Employees should ensure all the attachments to the emails should have passwords in order to ensure confidentiality. Employees are required to put their name to any disclosures they make. Anonymous complaints are usually not considered, though subject to verification.

The Company will hold it a serious disciplinary offense for any person who seeks to prevent a communication of malpractice concerned reaching to the designated person, or to impede any investigation which he or anyone on his behalf may make.

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3. Investigation Procedure

The format and length of an investigation will vary depending upon the nature and particular circumstances of each complaint made. The matters raised may:

- i. be investigated internally;
- ii. be referred to the External Auditor; and/or
- iii. form the subject of an independent inquiry

The ER/LR Manager, or an authorized Whistle-blowing Investigation Committee Member as designated to investigate the complaint will write to the complainant whenever reasonably practicable of the concern being received:

- i. acknowledging that the concern has been received;
- ii. advising whether or not the matter is to be investigated further and if so what the nature of the investigation will be;
- iii. giving an estimate of how long the investigation will take to provide a final response telling the complainant whether any initial inquiries have been made, and whether further investigation will take place, and if not, why not.
- iv. Whistle-blower shall be protected from any form of retaliation pending the resolution of the case. If so desired by the Whistle-blower, he/she may bring a representative to assist during the hearings.
- v. If claims are later proven or shown to be false, the Whistle-blower shall be liable unless shown that the filing is not malicious.
- vi. If case involves the HRD or the Client Relations & Communication Staff, the President & CEO may, at his discretion, form a separate & independent committee to investigate the case.

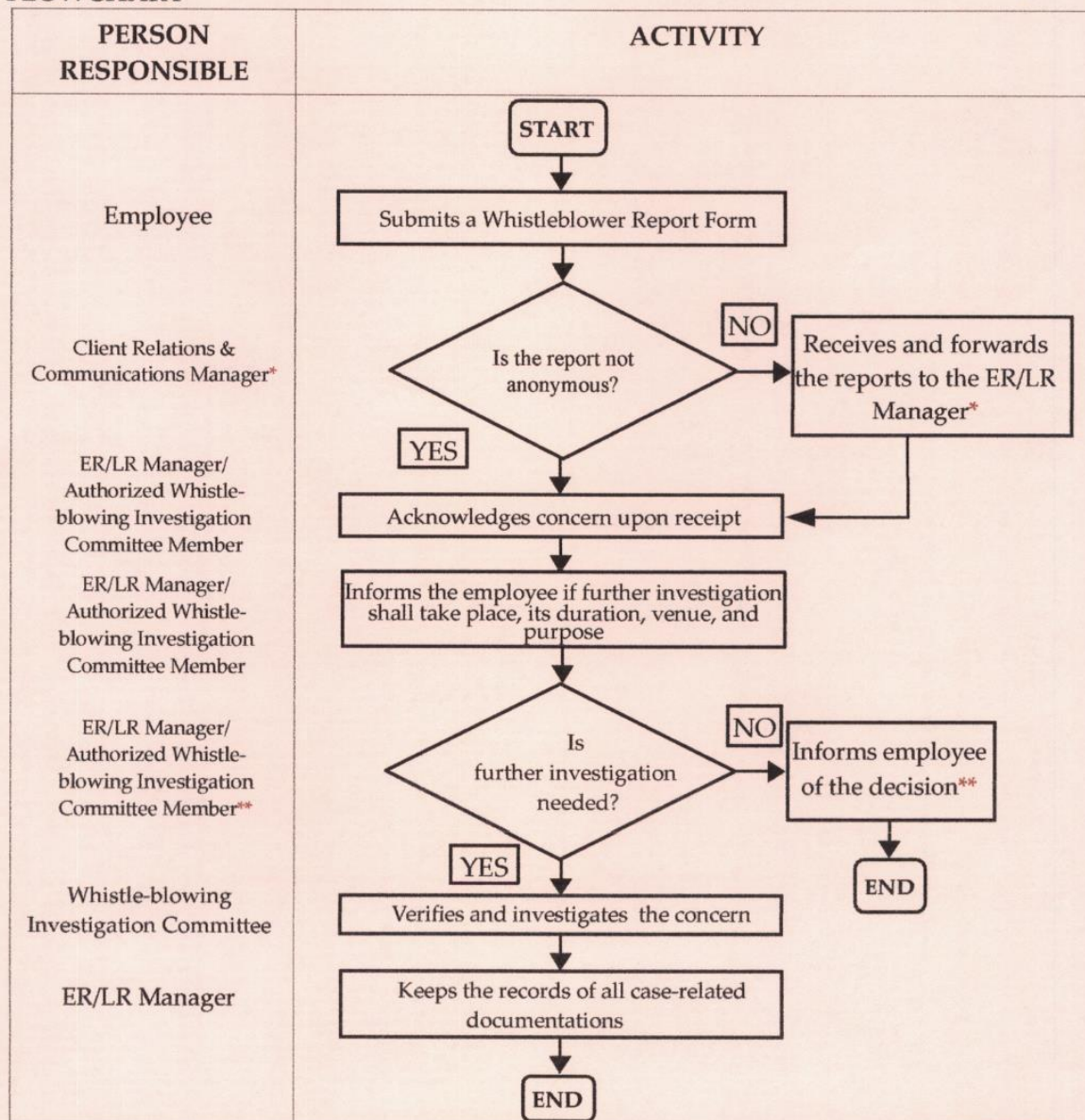


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FLOWCHART



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WORK INSTRUCTION:

Employee:

1. Disclosure of information relevant to suspected misconduct, malpractice or irregularity through a confidential reporting channel

Client Relations & Communications Manager:

1. Receipt of the reports through email
2. Forwards the reports to the ER/LR Manager for the review of the complaints.

ER/LR Manager

1. Receipt of the reports sent to the HRD
2. Review of the legitimate malpractice complaints and decide how the investigation should proceed
3. In-charge of communicating with the Whistle-blower
4. Record keeping of all the case-related documents

Whistle-blowing Committee:

1. Investigates the raised concerns

DOCUMENTATION:

1. Whistleblower Report Form
2. All case-related documents

DISSEMINATION:

Through updates during a Weekly Management Meeting and posting on the Communicator Bulletin Board

REFERENCE:

Policy: Metro Pacific Investments Corporation's Company Policies under Corporate Governance

Form: https://www.mnrb.com.my/sites/default/files/Whistleblowing_E_Form.pdf

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