



The HMO Subsidiary of Insular Life Assurance Company, Ltd.

**POLICY ON WHISTLEBLOWING
& NON-RETALIATION FOR
REPORTING OF WRONGDOINGS**



The HMO Subsidiary of Insular Life Assurance Company, Ltd.

Makati City, Philippines
July 2019

Magandang araw!

We at InLife Health Care continue in the pioneering spirit of our parent company, Insular Life (InLife), the first and largest Filipino life insurance company with an unbroken service record of more than a hundred years. Like our parent company, InLife Health Care has an unbroken service record which now spans almost three decades.

Acknowledging that our continued success largely depends on our reputation, our Company is conscientious in adhering with laws and applicable rules and regulations of the industry. We also strive to maintain a culture of transparency, integrity and accountability in all our business processes and transactions involving our officers, employees, agents, member-clients, suppliers, business partners and the public.

Toward this end, this Policy on Whistleblowing is implemented to foster an ethical organizational behavior by providing mechanisms through which wrongdoings may be reported. Together with this Policy on Whistleblowing, a Policy on Non-Retaliation for Reporting of Wrongdoings is adopted to protect whistleblowers from possible retaliation.

More than sustaining an organization where we can all be proud to be part of, this is about doing the right thing.

MARIA NOEMI G. AZURA
President and CEO

Wellness for a Lifetime

I. Definition of Terms

Unless the specific context otherwise provides, the following terms shall have the respective meaning whenever they are used in this Policy:

- a. Wrongdoing – refers to an act amounting, but is not limited, to the following:
 - i. Misconduct – an act in breach of InLife Health Care’s core values, Code of Conduct, Manual of Corporate Governance or other duly implemented Company policies and procedure, particularly those relating to honesty and integrity.
 - ii. Illegal activities – an act which is in violation of duly promulgated laws, ordinances, rules and regulations of the Republic of the Philippines or any of its departments, agencies and instrumentalities.
 - iii. Concealing, attempting or allowing the commission of any of the foregoing.
 - iv. Any other conduct or act similar to the foregoing.
- b. Whistleblower – refers to any person who has personal knowledge of any data or information concerning an actual or suspected wrongdoing, and who, in good faith believes the disclosure to be true and is not made maliciously or for personal gain, and deliberately discloses and reports the same. A whistleblower may be an officer, employee, agent, applicant, supplier, business partner, member-client, or any other third-party with whom the Company has/had an actual or potential contractual relationship;
- c. Whistleblowing – is defined as:
 - i. Disclosing any irregular act of an officer, employee or agent that a person reasonably believes to be in violation of a law, rule, regulation or InLife Health Care’s policies, rules and regulations.
 - ii. Providing information to, or testifying pursuant to the conduct of an investigation, hearing or inquiry related to a wrongdoing;
- d. Retaliatory Action – any adverse action or verifiable threat to commit an adverse action taken by a person involved in a reported wrongdoing or any individual doing work for or on behalf of such person, as a response to a whistleblower report which may include, but shall not be limited to, undue dismissal or suspension, harassment, blacklisting, or gossip-mongering;
- e. Whistleblower Report – an encompassing term covering any report made in good faith, pertaining to any perceived or actual wrongdoing through the whistleblowing platforms indicated in this Policy.

II. Whistleblowing Platform

The Whistleblower Report may be communicated through any of the following platforms:

- Face to face meeting with the Compliance Officer and/or Head of Internal Audit;
- Hard copy or email addressed to the Compliance Officer and/or Head of Internal Audit;
- Telephone or mobile phone numbers of the Compliance Officer and/or Head of Internal Audit.

Adequate details of the wrongdoing should be provided in the report to facilitate its review.

III. Identity of the Whistleblower

As a general rule, the true identity of the whistleblower must be disclosed. However, a whistleblower may opt to keep his/her identity anonymous if he/she thinks that the disclosure will put his/her security at risk.

IV. Investigating Officers

The complete name and contact details of the current Compliance Officer and Chief Auditor are as follows:

Mr. GERONIMO V. FRANCISCO

Email: gvfrancisco@insularhealthcare.com.ph

Office address: 2nd floor Insular Healthcare Building,
167 Legazpi St., Legaspi Village, Makati 1229, Metro Manila
Tel. No.: 8130131 Local 8056
Mobile No.: 09178580959 / 09088829957

Ms. MARJORIE ANNE Q. LEE

Email address: mglee@insular.com.ph

Office address: 32nd floor Insular Life Corporate Centre,
Insular Life Drive, Filinvest Corporate City, Alabang, Muntinlupa 1781
Tel. No.: 85821818 Local 1310
Mobile No.: 09175526111

V. Evaluation and Investigation

Upon receipt of a report or disclosure of a wrongdoing, the Compliance Officer or Head of Audit, as the case may be, shall evaluate and investigate the same. The Company shall also take the necessary or appropriate action depending on the results of the investigations.

Should the Compliance Officer or Head of Audit, as the case may be, find the report to be meritorious, he/she shall refer the matter to the following:

- For reports concerning Company Officers with the rank of Assistant Vice President (AVP) and higher, a detailed report with recommendation shall be forwarded to the Chairman of the Board or the President & CEO for proper disposition.
- For reports concerning all other employees, a detailed report with recommendation shall be forwarded to the Head of the Human Resources and shall be treated as a formal administrative complaint where the Compliance Officer and/or the whistleblower shall be named as complainants except in cases where the latter chooses to remain anonymous. Due process, meaning sufficient notice and reasonable opportunity to be heard, shall be observed in all stages of the proceedings.

VI. Reporting and Confidentiality

Any officer, employee or agent who suspects that a wrongdoing has been committed, is being committed or is attempted to be committed, should immediately notify the Compliance Officer or Head of Audit, as the case may be, and should not attempt to personally conduct investigations, interviews and/or interrogations related thereto.

All records of the proceedings shall be kept confidential. Investigation results shall not be disclosed or discussed with anyone other than the authorized persons above-mentioned. This is important in order to avoid irreparably damaging the reputation of persons suspected but subsequently found innocent of wrongful conduct and to protect the Company from any potential liability.

VII. Protection of the Whistleblower

This policy has been written to take into account the interest of the Company as well as the welfare of the whistleblower who makes disclosures about certain matters of concern.

The Company recognizes that the decision to report a concern or irregular act can be a difficult one to make. The Company must foster a fear-free environment. Hence, the Company shall never tolerate any harassment or victimization of a whistleblower (including informal pressures) in any form and shall take appropriate action thru it's Compliance Officer, to protect the whistleblower in good faith. Any act leading to or considered to be a retaliatory action against the whistleblower in good faith, even after the reported irregularity or issue has been resolved, shall be treated as a serious disciplinary offence which shall be dealt with under the Company's disciplinary rules and procedure.

VIII. False Report

Should the Compliance Officer or Head of Audit, as the case may be, determine that a whistleblower (i) knowingly submitted a report containing false allegations or (ii) presented fabricated evidence, the whistleblower, if an officer, employee or agent of the Company, shall be subjected to disciplinary action, without prejudice to any other legal action. If the whistleblower is not part of the Company, he shall be dealt with through proper legal actions.

IX. Responsibilities

Wrongdoings within the organization are detrimental to all stakeholders. Hence, officers, employees and agents are required to comply with this Policy while member-clients, suppliers and business partners are highly encouraged to do the same, and to report perceived or actual wrongdoing through appropriate reporting channels or platforms.

X. Corporate Recording and Monitoring

The Compliance Officer and Head of Audit shall maintain a whistleblowing register containing all concerns that are brought to his/her attention for records purposes. These records may be kept as long as needed for future reference. However, these records shall be kept in utmost confidentiality and may be opened or accessed only upon good cause and upon the sound discretion of the Compliance Officer.

An annual report for all whistleblowing incidents shall be submitted to the Audit Committee and the Chairman of the Board for proper policy identification and/or changes. The report should include a summary of the concerns raised, to which department they relate, and any applicable recommendations.

In producing the Annual Report, names of the parties involved shall be anonymized.

XI. Review of the Policy

The Compliance Officer, with the assistance of the Legal Department, shall be responsible for the administration, revision, interpretation, and application of this Policy. Review and revision may be done, as needed, subject to ratification by the Company's Board of Directors.

XII. Effectivity

This Policy shall take effect immediately upon approval of the Company's Board of Directors.