

1. What are the ALI Business Integrity Channels and why were these established?

**Answer:**

The ALI Business Integrity Channels refer to facilities, systems or set of procedures that enable someone to freely report fraud, violations of laws, rules and regulations or misconduct to people of authority without fear of Retaliation.

There are 6 reporting channels that a whistleblower may choose from. These are:

- face-to-face meetings with colleagues/management
- website
- email
- mail
- telephone
- Fax

2. If I want to remain anonymous, which channels can I use?

**Answer:**

The ALI Ethics Committee shall ensure that your anonymity is protected should you wish to remain unknown. In this case, you may choose from any of the following channels when reporting a concern:

- website
- e-mail (via an anonymous e-mail address)
- mail
- telephone
- fax

3. What types of concerns can I report to these channels?

| Reportable Condition                   | Definition                                                                                                                                                                                                                       | Examples                                                                                                                                                                           |
|----------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Conflicts of Interest</b>           | Conflicts of interest, subject to ALI’s policies, may refer to situations which may impair the objectivity of a person because of the possible incompatibility of the person’s self-interest and professional or public interest | <ul style="list-style-type: none"> <li>▪ inappropriate relations or questionable transactions with clients or suppliers</li> <li>▪ misuse of client/company information</li> </ul> |
| <b>Misconduct or Policy Violations</b> | Misconduct or policy violations refer to acts that violate moral or civil law, Code of Ethics, company policies, and/or contractual agreements                                                                                   | <ul style="list-style-type: none"> <li>▪ violation of Code of Ethics</li> <li>▪ control overrides</li> <li>▪ acting under false/insufficient authority</li> </ul>                  |

|                                          |                                                                                                                                                                                                     |                                                                                                                                                                                                  |
|------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Theft, Fraud, or Misappropriation</b> | Theft, fraud, or misappropriation refers to fraudulent appropriation of funds or properties entrusted to the Employee’s care but actually owned by the employer or someone else in the organization | <ul style="list-style-type: none"> <li>▪ stealing</li> <li>▪ misappropriation of funds</li> <li>▪ false representation</li> </ul>                                                                |
| <b>Falsification of Documents</b>        | Falsification of documents refers to counterfeiting, forging, falsifying or making fraudulent changes to any document                                                                               | <ul style="list-style-type: none"> <li>▪ forgery</li> <li>▪ alteration</li> <li>▪ tampering</li> </ul>                                                                                           |
| <b>Financial Reporting Concerns</b>      | Deliberate misstatements in recording and/or reporting business transactions or result of operations                                                                                                | <ul style="list-style-type: none"> <li>▪ incorrect recording of financial transactions</li> <li>▪ irregularities in application of accounting standards</li> <li>▪ misleading reports</li> </ul> |
| <b>Retaliation Complaints</b>            | Retaliation complaints are those filed by a Whistleblower due to any undesirable action taken against him — and in direct response to the Whistleblowing — because he reported wrongdoing           | <ul style="list-style-type: none"> <li>▪ job harassment</li> <li>▪ ostracism</li> <li>▪ unemployment</li> <li>▪ threat to security</li> </ul>                                                    |

4. What is the role of the ALI Ethics Committee and who are its members?

**Answer:**

The Committee shall be chaired by the ALI Human Resources Division (“ALI HRD”) and will be composed of the ALI Internal Audit Division (“ALI IAD”), ALI Risk Management Division (“ALI RMD”), and Ayala Group Legal (“AG Legal”).

The Committee shall investigate Whistleblowing Reports through ALI IAD. AG Legal, as the Committee’s prosecution arm, shall coordinate with ALI IAD. It shall provide legal advice to aid the Committee during the investigation process.

ALI HRD, as the administrator of justice, shall ensure that the decisions made by the Committee on every investigation are enforced. It shall coordinate with AG Legal.

The Compliance Officer and ALI RMD shall use final reports of investigations as inputs during their implementation of improvements in ALI’s control processes.

The Committee shall report to ALI Audit and Risk Committee in accordance with the provisions of Section 10.10.2 of the revised Whistleblowing Policy of ALI and its Subsidiaries.

5. What are my options if I want to file a report? When can I access these channels?

| Channel                                          | Details                                                                                                                                                                                                                                                                                                                                                                                                             | Availability                            |
|--------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|
| <b>Website (ProActive Hotline for ALI Group)</b> | Option 1 – Type this link in the address bar:<br><a href="https://services.punongbayan-araullo.com/extdata/proactive.nsf/goto/aligroup">https://services.punongbayan-araullo.com/extdata/proactive.nsf/goto/aligroup</a><br><br>Option 2 - Search “ProActive Hotline” in Google; Click the “Submit a Report” button; Type in “ALI Group” in the search field; Start reporting your concern.                         | 24/7                                    |
| <b>Face-to-face Meetings</b>                     | At the option of the whistleblower, he can meet with any member of the ALI Ethics Committee or employees of ALI/Subsidiary.<br>However, it is the responsibility of the Operator of face-to-face meetings to refer and fully disclose the Whistleblowing Report to ALI IAD. The Operator of a face-to-face meeting shall ask the Whistleblower if he is willing to sign the transcript of discussions between them. | Official business hours<br>(8am to 5pm) |
| <b>Email</b>                                     | <a href="mailto:myreport@ayalaland.com.ph">myreport@ayalaland.com.ph</a>                                                                                                                                                                                                                                                                                                                                            | 24/7                                    |
| <b>Telephone</b>                                 | (02) 988-2208                                                                                                                                                                                                                                                                                                                                                                                                       | Official business hours<br>(8am to 5pm) |
| <b>Fax</b>                                       | (02) 886-5506 local 208                                                                                                                                                                                                                                                                                                                                                                                             | Official business hours<br>(8am to 5pm) |
| <b>Mail</b>                                      | Makati City PO Box Number 1375<br>Attention to: ALI Business Integrity Channel                                                                                                                                                                                                                                                                                                                                      | 24/7                                    |

6. Who shall receive and process my report?

**Answer:**

The Operator designated by the ALI Ethics Committee shall receive and process all whistleblowing reports.

The Operator can refer to the Third-Party Service Provider (in this case Punongbayan & Araullo or P&A), staff and management of ALI IAD, colleagues or management within ALI and Subsidiaries.

The Operator shall depend on the Reporting Channel that the Whistleblower used to file a Reportable Condition, in accordance with Section 10.2 of the revised Whistleblowing Policy of ALI and Subsidiaries.

| Channel                                   | Operator                                                              | Final Repository of Reports* |
|-------------------------------------------|-----------------------------------------------------------------------|------------------------------|
| Website (ProActive Hotline for ALI Group) | ALI IAD                                                               | Website                      |
| Face-to-face Meetings                     | Colleagues or management officials at the option of the whistleblower | Website                      |
| Email                                     | P&A                                                                   | Website                      |
| Telephone                                 | P&A                                                                   | Website                      |
| Fax                                       | P&A                                                                   | Website                      |
| Mail                                      | P&A                                                                   | Website                      |

*\*All Whistleblowing Reports shall be logged in the Website being maintained by ALI Internal Audit Division.*

7. How can I ensure that the confidentiality of the report is protected?

**Answer:**

- The Website (ProActive Hotline for ALI Group) is an encrypted database equipped with Firewalls and Intrusion Prevention Systems. The website cannot be accessed without an authorized Lotus ID and cannot be ran/operated on an unauthorized server/machine. It is also resistant against SQL injection and all transactions are encrypted using SSL. The ticket numbers generated by the website are complex to prevent outside parties from guessing and accessing encoded information.
- Reports received and processed by Punongbayan & Araullo (i.e., e-mail, mail, telephone, fax) are governed by the confidentiality agreement documented in the contract signed by both Punongbayan & Araullo and ALI.

8. How can I ensure that my report is given due process?

**Answer:**

- The ALI Ethics Committee has established and approved the revised Whistleblowing Policy. As such, all reports shall be processed in accordance with the said policy and applicable laws.
- A whistleblower may follow up on the status of his/her report by logging in the Website and entering the ticket number previously issued to him/her by the Operator.