



1. COVERAGE

The Whistleblower Policy (the “Policy”) is applicable to all employees, officers, Directors of SOCResources, Inc. (hereinafter referred to as “SOC” or the “Company”), and its subsidiaries, third party business partners and other stakeholders. This Policy aims to guide individuals who come forward and raise serious concerns about perceived malpractice or wrongdoings which may pose a risk to the Company.

A “Whistleblower” as referred to in this Policy is an employee, officer, Director, contractor, or supplier who reports any covered activity.

Types of reportable covered activities:

1. Malpractice, such as illegal or unethical conduct;
2. Violation of corporate laws, Company’s Articles of incorporation, By-laws, the Corporation Code of the Philippines the Securities Regulation Code, and other pertinent laws and regulations.
3. Violation of the Company’s Corporate Code of Governance and other policies;
4. Fraudulent acts; and
5. Any other gross misconduct similar or related to the foregoing.

2. SAFEGUARDS

a) Confidentiality

All reports made to the proper Reporting Channel shall be treated as confidential. A whistleblower may opt to file an anonymous report which should, nevertheless, contain sufficient details to establish the facts of the complaint and persons involved. However, while the Company can provide internal anonymity, it cannot guarantee the same in the event an investigation is conducted, or a legal action is instituted on the strength of the disclosure. The Company is likewise not accountable for maintaining anonymity for disclosures made to persons or entities not authorized to receive a report under this

Policy. Anyone who reports a whistleblowing concern must do so in good faith. Any individual found responsible for making malicious allegations, or those made in bad faith, shall be subject to disciplinary actions which may include termination, without prejudice to any criminal or civil liability that may be determined in proper courts of law.

b) Whistleblower Protection

A whistleblower shall be protected from persecution, harassment or disciplinary actions as a result of any disclosure made in good faith. Further, the employees shall be free to report an alleged serious concern without fear of reprisals.

A whistleblower in good faith shall be protected from any retaliation against him. Retaliation complaints are those filed by the whistleblower due to any undesirable action taken against him, in direct response to the whistleblowing he made (e.g. job harassment, ostracism, unemployment, death threats, etc.). Cases of retaliation against any whistleblower may be reported through any of the Reporting Channels mentioned in Section 3. The retaliation complaint shall be dealt with in accordance with this Policy, other relevant Company policies and procedures, and any applicable laws.

c) Respondent Protection

The respondent is the person or entity against whom the whistleblowing report is made or directed. He shall be given the right to be heard and an opportunity to explain his side. Further, the members of the Whistleblowing Unit shall, before making their findings and recommendations, consider all evidence presented.

3. REPORTING CHANNELS

The following are the dedicated Reporting Channels:

Face to face meetings	Members of the Whistleblowing Unit or designated alternate officer
Email	socinfo@socres.com.ph , drbaladad@socinfo.com.ph
Mail	Office of the Corporate Information Officer 4 th Floor Enzo Bldg. 399 Senator Gil Puyat

	Avenue Makati City.
Telephone	(02) 804-1978
Telefax	(02) 804-1977

4. SUBMISSION OF WHISTLEBLOWING REPORT

Reports on any covered activity shall be made through the abovementioned Reporting Channels. The whistleblower may choose to identify himself or remain anonymous. In submitting a report, the whistleblower shall indicate his relationship with the Company (e.g. employee, customer, supplier, concerned citizen, other). In addition, the whistleblower shall state if the information subject of his report has been disclosed to anyone outside the Company and provide the details thereof, if any. The whistleblowing report shall be supported by any relevant evidence (e.g. pictures, documents, etc.).

5. CREATION OF THE WHISTLEBLOWING UNIT

The Board of Directors shall create a Whistleblowing Unit to be composed of at least one Independent Director, the Head of Human Resource Department and such other person in the Company that the Board finds competent, impartial and of good moral character.

6. WITHDRAWAL OF THE REPORT BY THE WHISTLEBLOWER

In the event that the whistleblower withdraws his report, the Whistleblowing Unit may nonetheless proceed with the investigation.

In case of insufficient information and the whistleblower fails to provide the additional information required by the Whistleblowing Unit, dismissal of the report may be recommended, and no further action shall be taken, unless the failure to provide said additional information is justified.

In the event that the respondent resigns or is otherwise separated from his employment or removed from his post for other reasons prior to the final resolution of the case, the investigation shall continue provided that the evidence gathered is sufficient.

7. FULL INVESTIGATION AND REPORTING

Upon receipt of the reports made hereunder, the members of the Whistleblowing Unit shall conduct the investigation in accordance with this Policy. After the investigation, the members of the Whistleblowing Unit shall make such findings as the evidence may warrant and submit its recommendation to the Chairman for appropriate action.

Upon approval of the final resolution, the case records shall be closed and the whistleblower shall be accordingly notified.

8. POLICY REVIEW

The Board Corporate Governance Committee shall make an annual review and assessment of the adequacy of this policy for the consideration and approval of the Board of Directors.

9. EFFECTIVITY

This Policy shall take effect immediately.