



WHISTLEBLOWING POLICY

Rationale

In pursuit of the highest standards of fairness, transparency, accountability, and ethical conduct, Phoenix Petroleum Philippines, Inc. (PPPI) shall establish clear procedures that enable all employees and stakeholders to raise concerns regarding internal controls, accounting or auditing matters, and any malpractice or wrongdoing that may affect the Company, its stockholders, or its stakeholders.

The Whistleblowing Policy is designed to ensure that such concerns are properly addressed through appropriate channels, fostering a culture of integrity and responsibility across the PPPI Group of Companies. At the same time, PPPI commits to safeguarding whistleblowers by providing protection against victimization, harassment, or undue disciplinary action, thereby encouraging the responsible reporting of issues without fear of reprisal.

Communication and Reporting

As a matter of procedure, all concerns relating to internal controls, accounting and audit matters, malpractice or wrongdoing, shall be communicated directly or anonymously, in writing or otherwise, in person or thru electronic mail, to the Internal Audit Department:

Internal Audit Department

Phoenix Petroleum Philippines, Inc.

Phoenix Petroleum Corporate Headquarters, Stella Hizon Reyes Road

Lanang, Davao City, Philippines

internalaudit@phoenixfuels.ph

The report may be made in any language widely used and understood in the place of employment or business relevant to the subject matter of the Whistleblower Report. It is highly recommended for the whistleblower to submit or attach any documents that serve as proof or evidence on the allegation/s mentioned in the report. The Internal Audit Department will report to the Audit Committee, as soon as the alleged reported matter was validated and supported. Should the concern involve the Compliance Officer or the Chief Audit Executive/ Head of Internal Audit/ Internal Audit Manager, then, communication may be directed to the Chairperson of the Audit Committee.

For clarity and to minimize misdirected communications or those reports that involve employee complaints or employment disputes, which will be handled directly by the Human Resources Department, shall be resolved following the processes contained in the Employees' Code of Conduct and Ethics.



Scope and Coverage

All the employees, management officials, suppliers, contractors, and business partners are covered by this policy.

The following concerns shall be considered subject to this policy:

- a. Gross mismanagement and resource wastage;
- b. Unsafe and grossly negligent work practices that may result in personal injury and/or death;
- c. Workplace bullying or abuse of authority;
- d. Human rights violations and exploitation of employees;
- e. Material financial misconduct, forgery or alteration of any document, account or financial instrument, money laundering or insider trading;
- f. Willful suppression of facts/deception in matters of appointment, placements, submission of reports, committee recommendations, which results in a wrongful gain or loss to the parties involved;
- g. Utilizing funds and resources of any of the PPPI Group of Companies for personal purposes;
- h. Authorizing or receiving payments for goods not supplied or services not rendered;
- i. Misconduct that defrauds any of the Companies within the PPPI Group and its stakeholders;
- j. Wrongdoing which threatens or damages other people besides the Employee;
- k. Activities undertaken by supervisors, managers, BU Heads, management officials of the Companies within the PPPI Group, which may be unlawful, against Company policies, fall below established standards or practices tantamount to improper conduct;
- l. Severe offenses that will expose any of the Companies within the PPPI Group into legal and/or reputational risks.

Confidentiality

All communications received by the Internal Audit Department/ Audit Committee of PPPI shall be kept confidential. The said Department and Committee will ensure that the identity of the whistleblower is protected when the latter so desires. It must be appreciated, however, that the investigation process may reveal the source of the information and a statement by the individual may be required as part of the evidence gathering. In case the whistleblower is not willing to furnish a written statement, the Internal Audit Department shall record the details in writing, as narrated.

Any processing of personal information carried out pursuant to this policy shall be carried out in accordance with the provisions of the Data Privacy Act of 2012 and its implementing rules and regulations, the issuances of the National Privacy Commission (NPC).



Responsibility

It is the responsibility of all the employees and the management officials to comply with the rules and regulations of the PPPI, and to report violations or suspected violations in accordance with this policy. All employees and management officials have a duty to cooperate with investigations initiated under this policy.

The PPPI encourages its management officials, employees, business partners, contractors, and suppliers to provide information for those unsafe, unlawful, unethical, fraudulent or wasteful practices observed.

Investigation

Upon receipt of the report from a whistleblower, the Internal Audit Department shall acknowledge the receipt of the report to the whistleblower within seven (7) working days. The Internal Audit Department shall conduct a preliminary audit investigation within fifteen (15) working days to determine whether there is sufficient evidence to support the allegation/s raised. The audit investigation report shall be submitted/ presented to the Management and/or the Audit Committee. If the report warrants further thorough investigation, the Management and/ or the Audit Committee shall then appoint an investigating body to conduct a thorough investigation. A written report which includes recommendations to the Management and the Audit Committee for evaluation and approval on ways forward.

The conduct of the investigation shall follow best practice in investigations and be fair and independent of either the employee, the business unit concerned, the whistleblower or any person being the subject of the reportable conduct.

Investigation results will not be disclosed or discussed with anyone other than those who have a legitimate need to know. This is important in order to avoid damaging the reputation of persons suspected but subsequently found innocent of wrongful conduct, and to protect PPPI and the Companies under the PPPI Group from potential civil liability. If the whistleblower decides to be identified, he/she shall have the right to be kept informed of the progress and the outcome of the investigation, within the constraints of maintaining confidentiality or observing legal restrictions. The applicable laws, rules and regulations shall be observed in any investigation arising out of a whistleblower report. As such, the person against whom the allegation is made shall be given the right to due process, including the opportunity to present evidence to disprove the allegation.

The Audit Committee shall determine whether any action or response is necessary or appropriate in respect of a communication, and it will take or direct such action as it deems appropriate.

Protection

The Audit Committee and the Board of Directors of any of the PPPI Group of Companies shall not tolerate any retaliation, in any form, against any employee who, in good faith, raises a concern or reports a possible legal or ethical violation. However, any employee or management official found responsible for making allegations maliciously or in bad faith shall be subject to disciplinary action as described in the Employees' Code of Conduct and Ethics, up to and including termination of employment. In case of an external whistleblower, the PPPI reserves the right to take appropriate action against him/her to recover any loss or damage as a result of a false report.

Effectivity

This policy shall supersede all existing policies inconsistent with the intention and mandate herein stated. This shall be reviewed periodically to ensure its effectiveness.

This policy was reviewed and endorsed by the members of the Audit Committee during its quarterly meeting.

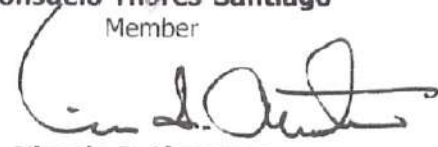

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This policy takes effect immediately upon approval of the Board of Directors during its meeting.

Prepared by: **Internal Audit Department**

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