PAGCOR
WHISTLEBLOWING POLICY AND GUIDELINES
I. LEGAL BASIS

The PAGCOR Whistleblowing Policy (Policy) is pursuant to the Governance Commission for Government Owned or Controlled Corporations (GCG) Memorandum Circular No. 2016-02, or the Revised Whistleblowing Policy for the Government Owned or Controlled Corporations (GOCCs) Sector.¹

II. POLICY STATEMENT

PAGCOR is committed to the highest standards of ethical and legal conduct in operations, and in order to maintain these standards, PAGCOR strongly encourages any concerned individual who has genuine concerns or complaints about a Reportable Condition under this Policy to raise these concerns or complaints without fear of retaliation.

III. OBJECTIVES

This Policy:

3.1 Serves as a reporting channel for the receipt, investigation, and if warranted, prosecution of concerns or complaints about Reportable Conditions under this Policy;

3.2 Guarantees any concerned individual's freedom to raise concerns or complaints which, based on personal knowledge and/or authentic records, constitute any of the Reportable Conditions under this Policy;

3.3 Strengthens a culture of accountability, transparency and trust in PAGCOR by establishing procedures that ensures thorough and impartial investigation of all verifiable reports and irregularities;

3.4 Above all, serves as an early warning system about what may be going wrong at various levels within PAGCOR, which, in turn, will help PAGCOR in realigning various processes and in adopting corrective actions as part of good governance practice.

IV. WHISTLEBLOWERS

¹ Governance Commission for Government Owned or Controlled Corporations Memorandum Circular No. 2016-02
The following may report concerns or complaints under this Policy:

a. Directors;
b. Employees and Officers;
c. Consultants;
d. Employees of other agencies deployed for PAGCOR’s activities, whether working in any of PAGCOR’s office or workplace;
e. Contractors, suppliers or agencies providing any material, equipment or service to PAGCOR;
f. Customers of PAGCOR;
g. Any other concerned individuals.

V. SCOPE

5.1 REPORTABLE CONDITIONS – Whistleblowers may report acts/omissions that are illegal, unethical, violative of good governance principles, are against public policy and morals, promote unsound and unhealthy business practices, are grossly disadvantageous to PAGCOR, such as, but not limited to:²

1) Abuse of Authority
2) Bribery
3) Conflict of Interest
4) Destruction/Manipulation of Records
5) Fixing
6) Inefficiency
7) Making False Statements
8) Malversation
9) Misappropriation of Assets
10) Misconduct
11) Money Laundering
12) Negligence of Duty
13) Nepotism
14) Plunder
15) Receiving a Commission
16) Solicitation of Gifts
17) Taking Advantage of Corporate Opportunities
18) Undue Delay in Rendition of Services
19) Undue Influence
20) Violation of Procurement Laws

5.2 This Policy also covers irregularities that may adversely impact PAGCOR, such as, but not limited to, violations of the following:

a. Executive Order (E.O.) No. 292, s. 1987 (Administrative Code of 1987);
b. Book II, Act No. 3815 (Revised Penal Code of the Philippines);

² Item No. 4, GCG Memorandum Circular No. 2016-2 (Revised Whistleblowing Policy for the GOCC Sector)
c. Republic Act No. 10149 (GOCC Governance Act of 2011);
d. Republic Act No. 6713 (Code of Conduct and Ethical Standards for Public Officials and Employees);
e. Republic Act No. 3019 (Anti-Graft and Corrupt Practices Act);
f. Republic Act No. 7080, as amended (Plunder Law);
g. 2017 Rules on Administrative Cases in the Civil Service (2017 RACCS);
h. GCG Memorandum Circular (M.C.) No. 2012-05: “Fit and Proper Rule”;
i. GCG M.C. No. 2012-06: “Ownership and Operations Manual Governing the GOCC Sector”;
j. GCG M.C. No. 2012-07: Code of Corporate Governance for GOCCs”
k. PAGCOR Code of Conduct;
l. Revised Rules on Administrative Cases in the Philippine Amusement and Gaming Corporation (PAGCOR RRACs); and
m. Applicable laws, rules and regulations.

5.3 Initial report of concerns or complaints which constitute any of the Reportable Conditions may be in writing, telephonically or in person. However, for purposes of further investigation and prosecution, if warranted, the concerns or complaints should be reduced in writing. The format provided in Appendix 1 may be used for such purpose.

The following will ordinarily not be acted upon:

(1) Complaints that are illegible, if handwritten;
(2) Complaints that are frivolous or trivial in nature;
(3) When the same issues are already pending before any court of law, the Civil Service Commission (CSC) or the Office of the Ombudsman or any other tribunal or agency;
(4) Career-related issues such as promotion, job performance appraisal, terms and conditions of employment, etc.

6 CONFIDENTIALITY

Except when the whistleblower does not invoke anonymity and/or confidentiality when invoking this Policy, PAGCOR shall ensure confidentiality of all information arising from concerns or complaints submitted pursuant to this Policy, including the identity of the whistleblower and the Subject of the concern or complaint. The identity of the whistleblower will be kept
confidential unless the information is provided in confidence to legal professionals for the purpose of obtaining professional advice, compelled by law or the Courts to be revealed, or unless the whistleblower authorized the release of the information or his/her identity.  

7 CONDUCT PROTECTED BY THIS POLICY

PAGCOR assures protection under this Policy to:

- One who discloses information that constitutes any of the Reportable Conditions under this Policy based on direct personal knowledge and/or authentic records;
- Officials, employees and/or other private individuals who are called upon to testify in a hearing or participate in an investigation pertaining to the concern or complaint.

8 PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

8.1 No retaliatory action shall be taken against a whistleblower by virtue of his/her report. Such retaliatory acts may include:

a. Discrimination or harassment in the workplace;
b. Demotion;
c. Reduction in salary or benefits;
d. Termination of contract;
e. Evident bias in performance evaluation; or
f. Any acts or threats that may adversely affect the rights and interests of the whistleblower.

8.2 The protection is available provided that:

a. The report is made in good faith; and
b. The information and the allegations contained therein are true based on direct personal knowledge and/or authentic records, even if the allegations are not subsequently confirmed by the investigation.

8.3 In order to protect the identity of the whistleblower, the Ethics Officer shall remove all the information pertaining to the identity of the former. The whistleblower is advised not to write his/her name on the envelope.

8.4 PAGCOR shall not tolerate the harassment or victimization of anyone raising a genuine concern or complaint. As a matter of deterrence, PAGCOR shall publicly inform employees of the final and executory

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3 Item No. 7, GCG Memorandum Circular No. 2016-2 (Revised Whistleblowing Policy for the GOCC Sector)
disciplinary action taken against any person from misconduct arising from retaliation.

8.5 A bona fide whistleblower has the defense of absolute privileged communication in any internal disciplinary action against him/her arising from a report (s) he has made.

8.6 If someone reports a concern or complaint on behalf of another, the former shall not be punished for doing so; provided that the facts of the matter are true based on direct personal knowledge and/or authentic records and that (s) he is making the report on any reportable Condition.

9 DISQUALIFICATION FROM PROTECTION

9.1 If a whistleblower makes allegations that are determined to be fabricated or malicious falsehoods, and/or (s) he persists in making them, legal action may be taken against him/her by PAGCOR.\(^4\)

9.2 Subject to the rule on "Immunity" under this Policy, whistleblowing shall not shield him/her from the adverse consequences from any involvement in another irregularity or wrongdoing.

9.3 Protection against retaliation excludes immunity from consequences arising from poor job performance and other similar undesirable conditions not related to the reported concern or complaint.

10 IMMUNITY

10.1 An employee who had been charged together with another employee and who subsequently turns into a whistleblower shall be exempt from prosecution in the administrative case(s) where his/her information and testimony are given. This contemplates a situation wherein jurisdiction is already acquired by the Vigilance Committee at the onset.

10.2 The discharge of a respondent turned whistleblower may be granted by the PAGCOR Board of Directors upon the recommendation of the Vigilance Committee following the application of the respondent-informant and before the termination of the investigation, provided that:

   a. There is absolute necessity for the testimony of the respondent-informant whose discharge is requested;

\(^4\) Item 9 (Untrue Allegations), GCG Memorandum Circular No. 2016-2
b. There is no other direct evidence available for the proper prosecution of the offense committed, except the testimony of said respondent-informant;

c. The testimony of said respondent-informant can be substantially corroborated in its material points;

d. The respondent-informant has not been previously convicted of a crime involving moral turpitude; and

e. Said respondent-informant does not appear to be the most guilty.

Evidence adduced in support of the discharge shall automatically form part of the records of the investigation. Should the Vigilance Committee or the PAGCOR Board of Directors deny the request for discharge as a witness, his/her sworn statement shall be inadmissible as evidence.

10.3 If the respondent-informant who has been granted immunity fails or refuses to testify or to continue to testify, or testifies falsely or evasively, or violates any condition accompanying such immunity without just cause, as determined by the Vigilance Committee, his/her immunity shall be cancelled and (s)he shall be prosecuted administratively and/or criminally.

11 ROLES AND RESPONSIBILITIES

11.1 Directors/ Branch Managers/ Department Heads/ General Managers

- Promoting and providing a safe environment where employees are confident to raise concerns or complaints without fear of retaliation.

- Ensuring that mechanisms are in place within the office/area/branch for those who want to raise concerns or complaints.

11.2 Line Managers

- Providing a safe environment where employees are comfortable raising concerns or complaints.

- Not deterring, bullying, isolating or otherwise victimizing anyone using this Policy, or suppressing, destroying or tampering with information about a Reportable Condition, all of which may result in disciplinary action.
11.3 Human Resource and Development Group

- Assuring the effective communication and dissemination of this Policy to employees in all offices and branches of PAGCOR.

- Furnishing the Vigilance Committee, its Secretariat and the Ethics Officers copies of 201 files and other documents pertinent to the investigation with utmost confidentiality, i.e. without the need for a formal request.

11.4 Employees

- Understanding that they have a right and a duty to raise genuine and legitimate concerns or complaints at the earliest reasonable opportunity.

- Reporting and pursuing concerns or complaints within the purview of this Policy.

- Understanding:
  - The importance of this Policy to themselves, to PAGCOR and to all who deal with PAGCOR;
  - That when faced with doubts over raising a concern or complaint, s/he should always do so;
  - That raising a genuine concern or complaint does not make one a troublemaker.

11.5 Vigilance Committee

- Conducting the inquiry in a fair and unbiased manner.

- Ensuring complete fact-finding and formal investigation.

- Reporting and pursuing concerns or complaints within the purview of this Policy.

- Maintaining strict confidentiality.

- Undertaking measures to ensure the well-being of the whistleblower.

- Deciding on the outcome of the investigation, whether a Reportable Condition has been committed, and if so, by whom.
• Recommending an appropriate course of action – suggested disciplinary action and preventive measures to the appropriate authority.

11.6 Ethics Officers

• Conducting the fact-finding and preliminary investigation promptly and seriously.

• Maintaining confidentiality of all the records and the identity of the participants in the investigation.

11.7 Investigation Participants

• Cooperating fully with the investigators.

• Maintaining confidentiality concerning the matters under investigation.

12 THE SUBJECT

12.1 The Subject shall have the right to due process and the Vigilance Committee shall give ample opportunity for the Subject to explain his/her side on the concern or complaint.

12.2 After the conclusion of the entire proceeding, the Subject shall have the right to be notified of the Board of Director's decision regarding his/her administrative case thru the Human Resource and Development Group (HRDG).

13 INVESTIGATION PANEL

13.1 Ethics Officers:

The powers, duties and functions of Ethics Officers shall be performed actually, directly and exclusively by the Corporate Investigation Department (CID) of PAGCOR.

Under this Policy, the CID shall also investigate and prosecute, upon a finding of *prima facie* evidence, any employee or officer for any retaliatory action against a whistleblower.
13.2 Vigilance Committee:

The PAGCOR Board of Directors shall appoint the members of the Vigilance Committee. One (1) officer may be appointed from each of the following:

a. Human Resource and Development Group;
b. Corporate Services Department or Legal Services Department;
c. Adjudication Secretariat and Hearing Department;
d. Anti-Money Laundering Compliance Department;
e. Security Group; and
f. Such other department(s), unit(s) or office(s) the PAGCOR Board of Directors deems fit.

The Vigilance Committee shall conduct the formal investigation. No member of the Vigilance Committee shall have a personal or professional relationship or other conflict of interest, perceived or actual, with the whistleblower or the Subject.

13.3 Secretariat:

The Corporate Services Department (CSD) or Legal Services Department (LSD) shall serve as the Secretariat of the Vigilance Committee. The designated personnel shall perform tasks, such as but not limited to the following:

a. Receive documents and pleadings filed by the parties during the formal investigation;
b. Prepare summons to secure the attendance of all the participants in the formal investigation;
c. Record the minutes of meetings, formal investigations or proceedings;
d. Secure the documents and materials relevant to the formal investigation; and
e. Assist in the preparation of the final report of the Vigilance Committee.

13.4 Funding:

Funds for the activities of the Vigilance Committee and the Committee's Secretariat shall be charged to the Legal Group.

13.5 Per Diems:

The members of the Vigilance Committee and the Committee's Secretariat shall be entitled to per diem for every meeting or proceeding they actually participated.
14 PROCEDURES

The procedures for raising and handling concerns or complaints under this Policy are set out below:

14.1 RAISING CONCERNS OR COMPLAINTS

1) Preferably, the concern or complaint should either be typed or written legibly in English or Filipino.

   It may be filed personally or mailed to –

   **THE ETHICS OFFICER**
   Corporate Investigation Department
   PAGCOR CORPORATE ANNEX
   6th Floor, Carmen Building
   U.N. Avenue corner Maria Orosa Street
   Ermita, Manila 1000

   If sent via post, the concern or complaint should be sealed in an envelope with –

   **"STRICTLY CONFIDENTIAL AND TO BE OPENED BY ADDRESSEE ONLY"**

   indicated and addressed to the above.

2) The concern or complaint may also be filed by electronic means thru the following e-mail address: Corporate.InvestigationDepartment@pagcor.ph.

3) The concern or complaint should provide original information in terms of -

   i. What happened (nature and extent of the irregularity);
   ii. When it occurred (date/s and time/s);
   iii. Where it occurred (location/s);
   iv. Who was involved (identity of the alleged wrongdoer);
   v. Witnesses, if any;
   vi. Why it occurred (if possible);
   vii. Effects on the whistleblower, if any;
   viii. Reaction of the person/s concerned at the time of the alleged incident;
   ix. The frequency of any incident;
   x. Whether the whistleblower has a personal interest in the matter;
xi. Whether the whistleblower has pursued any other concerns or complaints in connection therewith; and
xii. Other issue/s relevant to the concern or complaint raised.

4) The whistleblower may be asked to provide further clarifications and information from time to time.

5) If exceptionally, the whistleblower is not comfortable with reporting a concern or complaint to the Ethics Officer or believe that his/her disclosure is not being treated in an appropriate way, (s)he may consult with any member of the Vigilance Committee.

14.2 WHISTLEBLOWER HELPLINE

Besides face-to-face meetings, concerns or complaints may be raised via the Whistleblower Helpline. This is a confidential and secure means to enable Ethics Officers stationed at the Corporate Investigation Department (CID) to receive disclosures.

The particulars are as follows:

<table>
<thead>
<tr>
<th>Helpline:</th>
<th>(632) 7755-3775 (632) 7755-3799 Local 7193</th>
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<tbody>
<tr>
<td>Offering hours:</td>
<td>8:00 A.M. to 7:00 P.M. Mondays to Fridays (Excluding public holidays)</td>
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| Preparation required prior to calling the Helpline | To accomplish an effective call, you are expected to prepare the following information prior to calling the Helpline:
  - Nature of the alleged irregularity;
  - Date of the alleged irregularity;
  - Time and place of its occurrence;
  - The identity of the alleged wrongdoer;
  - Particulars or production of documentary evidence, if any; and
  - Other details deemed to be useful to facilitate preliminary screening and action |

The Information Technology Department (ITD), including the Communications and Network Technology Unit (CNTU), of PAGCOR shall provide facilities for the Whistleblower Helpline.

Received calls shall be recorded in a logbook containing the following information:

- Date and time received;
- Details of call; and
- Identity of caller (if applicable).
The logbook should be kept under lock and key and may be accessed only by the assigned custodian of the Corporate Investigation Department (CID). The Vigilance Committee could request for a copy of the logbook entry whenever necessary.

14.3 ALTERNATE REPORTING CHANNELS

<table>
<thead>
<tr>
<th>a. Face-to-face meetings:</th>
<th>with GCG Officers and Employees</th>
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<tbody>
<tr>
<td>b. E-mail:</td>
<td><a href="mailto:feedback@gcg.gov.ph">feedback@gcg.gov.ph</a></td>
</tr>
<tr>
<td>c. Mail:</td>
<td>3rd Floor Citibank Center</td>
</tr>
<tr>
<td>d. Telephone:</td>
<td>(632) 5323-2030 to 33</td>
</tr>
<tr>
<td>e. Fax:</td>
<td>(632) 5323-2030 to 33</td>
</tr>
</tbody>
</table>

14.4 HANDLING OF CONCERNS OR COMPLAINTS

A. SCREENING AND ASSESSMENT

The Ethics Officer(s) shall determine whether the concern or complaint falls under this Policy. Otherwise, the same shall be referred to the appropriate investigating body and will be treated as ordinary concern or complaint which will be dealt with in accordance with the procedure of the investigating body.

The Ethics Officer(s) shall:

a. evaluate the allegations in the complaint;

b. determine whether an investigation is justified; and

c. notify the whistleblower in writing whether, in his judgment, a reasonable basis exists for commencing an investigation.

If the whistleblower’s concern or complaint involves an Ethics Officer, a member of the Vigilance Committee, or the Committee’s Secretariat, the Subject shall be excluded from performing the functions described in this Policy.

B. PRELIMINARY ACTION

1. The Ethics Officer(s) shall make a decision, including but not limited to any of the following:

1.1 Reject the whistleblower’s concern or complaint and refer to the appropriate investigating body if it falls under any of the circumstances mentioned hereunder:

   i. It is not based on direct personal knowledge and/or authentic records;

   ii. It does not fall within the scope of the Reportable Conditions;
1.2 Proceed to investigate the concern or complaint pursuant to its internal rules; or

2. The Ethics Officer(s) shall liaise with the Vigilance Committee to determine the next course of action on the calls/reports received. This may include:
   - Scope and nature of investigation;
   - Means, method and manner of investigation;
   - Level of involvement of other departments or units of PAGCOR, or external authority;
   - Time frame to complete the inquiry/investigation.

3. In the event the concern or complaint is given due course, the Subject shall be informed of the allegations and given ample opportunity to explain his/her side.

C. WITHDRAWAL OF THE REPORT/INFORMATION BY THE WHISTLEBLOWER

The withdrawal of the concern or complaint does not result in its outright dismissal or discharge of the Subject from any administrative liability.

D. INVESTIGATION

1. A preliminary investigation shall be conducted through the issuance of show cause memorandum or by requiring the submission of counter affidavit or comment from the Subject within three (3) days from receipt thereof.

2. The investigation may have to be conducted under strict confidentiality, i.e. by not informing the Subject of the concern or complaint until it becomes necessary to do so.

3. The Subject shall be accorded due process, and his identity shall be kept confidential to the extent possible given the legitimate needs of the investigation.

4. The Subject has the duty to cooperate fully during the investigation without prejudice to the right against self-incrimination under the Constitution and applicable laws.

5. The Subject shall not interfere with the investigation and may be preventively suspended in accordance with the 2017 Rules on Administrative Cases in the Civil Service.
6. In the event the whistleblower is implicated or discovered to be or had been involved in the same wrongdoing, (s)he may also be investigated in accordance with this Policy.

7. The confidentiality of all participants in the investigation shall be maintained to the maximum extent possible throughout the investigation.

8. If the Ethics Officer determines that there is *prima facie* evidence to warrant the prosecution of the Subject, then (s)he shall take steps leading to the issuance of the formal charge by the disciplining authority, and the formal investigation before the Vigilance Committee in accordance with the procedure under the 2017 Rules on Administrative Cases in the Civil Service.

9. If the Ethics Officer concludes that there exists no *prima facie* case against the Subject, the investigation shall be terminated and a preliminary investigation report shall be submitted to the Chairperson and the Chief Executive Officer (CCEO) recommending for the dismissal of the case.

10. The Vigilance Committee has the power to perform acts such as but not limited to the following:

   a. Issue summons to the Subject and all concerned individuals to secure attendance during the formal investigation, meetings or other relevant proceedings;

   b. Examine the Subject and all witnesses relevant to the concern or complaint;

   c. Order the Subject and all concerned individuals to produce documents and things relevant to the case;

   d. Request records from any office/department of PAGCOR;

   e. Obtain legal or expert opinion in relation to the concern or complaint;

   f. Seek the assistance of the Internal Auditor and/or the Commission on Audit (COA); and

   g. Call for information/document(s) from any employee or other person(s) as the Committee may deem necessary for the purpose of investigation.
11. Unless there is an imminent threat to life or safety, the whistleblower may be compelled to testify if his/her testimony is, in the Ethics Officer's determination, indispensable to the successful prosecution of any case. However, the Vigilance Committee shall adopt ways and means to protect the identity of the whistleblower.

E. FINAL REPORT

The conclusions and recommendations of the investigation before the Vigilance Committee shall be documented in a formal investigation report. This shall be submitted directly and exclusively to the PAGCOR Board of Directors. It shall contain findings of fact, a list of persons interviewed, an analysis of the evidence, and a detailed description of the investigative process.

F. REPORTING OF OUTCOME

The PAGCOR Board of Directors shall inform the Human Resource and Development Group (HRDG) of its decision of the case. It shall be the responsibility of the HRDG to notify the respondent.

15 ACTIONS ARISING FROM INVESTIGATIONS

15.1 DISCIPLINARY ACTION

Persons who are adjudged guilty of an offense shall be dealt with in accordance with the 2017 Rules on Administrative Cases in the Civil Service. In addition, where appropriate, the Vigilance Committee shall refer the case to the Legal Group with a view to initiating criminal prosecution.

15.2 CHANGES TO SYSTEM OF CONTROLS

Whenever there is a finding related to any stage of the proceeding by the Vigilance Committee, the same may recommend improvements to the system.

15.3 RECOVERY OF LOSSES

In cases where the person is found guilty of depriving the government of money or property, restitution shall be required before the PAGCOR Board of Directors can favorably recommend the removal of administrative penalties or disabilities.

16 RECORD RETENTION
All information, documents and other relevant materials collected as part of the investigation shall be retained by the Company for a minimum period of five (5) years or whatever other period may be specified by any applicable law.

17 COMMUNICATION OF THE POLICY

17.1 This Policy shall be disseminated by the Human Resource and Development Group (HRDG) through but not limited to the following channels:
   a. PAGCOR website (pagcor.ph)
   b. PAGCOR bulletin boards

17.2 All employees, consultants and contractors shall be informed whenever amendments or revisions to this Policy are made.

18 AMENDMENTS TO THIS POLICY

The PAGCOR Board of Directors is vested with full power to review, update and amend this Policy at any time without prior notice, and to delegate such power to any person it deems fit.

While PAGCOR has exerted best efforts to define detailed procedures for implementation of this Policy, there may be certain matters that were not addressed or there might be ambiguity in the procedures. Such difficulties or ambiguities shall be resolved in line with the broad intent of this Policy. In addition, PAGCOR may establish rules and procedures from time to time to give effect to the intent of this Policy and further the objective of good corporate governance.

19 TRANSITORY PROVISION

19.1 This Policy shall be applied prospectively to concerns or complaints filed after its date of effectivity.

19.2 This Policy supersedes Article 217 and other provisions of the Revised Rules on Administrative Cases in the Philippine Amusement and Gaming Corporation (i.e. PAGCOR RRACs) inconsistent herewith.

19.3 Pursuant to the directive of the PAGCOR Board of Directors, the Information Technology Department (ITD) shall make the necessary action for the establishment of an online link in the PAGCOR website to GCG's
Whistleblowing Policy and Guidelines
PAGCOR

Whistleblowing Web Portal. A link of which is found in the PAGCOR website.

20 EFFECTIVITY

This Policy shall take effect immediately upon approval by the Board of Directors of PAGCOR.
APPENDIX “1”

WHISTLEBLOWER REPORT FORM

CONFIDENTIAL

PAGCOR is committed to the highest standards of openness, probity and accountability. In line with that commitment, we expect employees who have concerns about any suspected or actual irregularity within PAGCOR to come forward and voice those concerns.

It is recognized that in most cases, the person raising concerns wishes that it be dealt with on a confidential basis. All reasonable efforts will therefore be made to avoid revealing the person’s identity.

If you want to submit a report on the following matters, you can accomplish this Report Form. Once completed, this becomes confidential and your identity shall be protected.

Accomplishment of this Report Form does not guarantee that your complaint will be taken under the Whistleblowing Policy and Guidelines; it may be referred to the appropriate investigating body.

Your Name / Contact No. and E-mail

PAGCOR encourages you to provide your name with this report

Name:

Address:

Tel. No.:

E-mail:

Date:
Please select the applicable incident type(s) from the list below that best describes the issue(s) you are reporting. Multiple issues may be selected.

- Abuse of Authority
- Bribery
- Conflict of Interest
- Destruction/Manipulation of Records
- Fixing
- Inefficiency
- Making False Statements
- Malversation
- Misappropriation of Assets
- Misconduct
- Money Laundering
- Negligence of Duty
- Nepotism
- Plunder
- Receiving a Commission
- Solicitation of Gifts
- Taking Advantage of Corporate Opportunities
- Undue Delay in Rendition of Services
- Undue Influence
- Violation of Procurement Laws
- Others

Please provide name, position and department of the person(s) involved:

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<thead>
<tr>
<th>NAME</th>
<th>POSITION</th>
<th>DEPARTMENT/BRANCH</th>
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</table>

What concern/complaint occurred?

When and where did the incident occur?

Where did the incident take place?

How did you find out about this incident?
APPENDIX “2”

WHISTLEBLOWING FLOW CHART

Whistleblowing Policy and Guidelines
PAGCOR

Screening and assessment of whistleblower's concern/claim prepared by the Ethics Officer

a.irable conditions
b. personal knowledge

either a or b
Rejection and endorsement to appropriate investigating body [include in quarterly report to the Vigilance Committee]

both a and b

Preparation of evaluation report of basis for commencing investigation or rejecting the claim

Facilitating investigations: interview of whistleblower, subject and witnesses, taking of sworn statements, such as inspection and gathering of evidence

Preliminary Investigation
Service of show-cause memo to subject

Submission of concerns or issues identified by subject and witnesses upon receipt

Evaluation of existence and permanence of the existence of prima facie case

Yes

No

Disclaimer of existence and permanence of the existence of prima facie case

Yes

Existence of prima facie case

No

Submission of preliminary investigation report and sworn affidavit by the Ethics Officer to the OED and the Legal Group

Approval of sworn affidavit by the OED and the Legal Group

No

Yes

Resume to Ethics Officer for issuance of formal charges to respondent

Submission of respondent's Answer within 10 days upon receipt

Yes

No

Disclaimer of affidavit

Formal investigation hearing by the Vigilance Committee within 30 days from issuance of formal charge

Submission of formal investigation report with recommendations to the BOD

Approval of recommendations by the BOD

No

Yes

Issuance of final decision by the BOD to the HROG

Service of statement of the BOD's decision to respondent by the HROG