SECTION 1: PURPOSE

The Company upholds its commitment to the highest standards of business and personal ethics in the conduct of its employees' duties and responsibilities. As such, the Company requires all employees to observe transparency, integrity, and accountability.

The Whistleblowing Policy shall provide for and encourage employees to report, in good faith, any wrongful act or omission, malpractice or irregularity committed by other employees, Senior Management personnel or Board members. The policy will also ensure that employees will be protected against harassment, threats, and any other forms of retaliation or adverse employment consequences as a result of their disclosure

The policy shall serve as a clear statement that if any covered wrongdoing by any of its employees, Senior Management personnel or Board members is identified and reported accordingly, it shall be dealt with correspondingly through an extensive investigation and proper imposition of accountability.

The Company shall also take steps to ensure that such wrongdoing is prevented in the future.

However, this policy is not designed to further any personal disputes, question legitimate financial or business decisions taken by the Company, and nor should it be used to reconsider any matters which have already been properly addressed under other Company processes or procedures.

SECTION 2: SCOPE

The Whistleblowing Policy shall cover Globe Fintech Innovations, Inc. (the Company).

SECTION 3: DEFINITION OF TERMS

Whistleblower – refers to the employee who makes a report about any suspected or actual wrongdoings defined as reportable conditions, and has a reasonable belief that the information is true at the time of reporting. Reporting has to be made to the official whistleblowing channels of the Company.

Protected Disclosure – refers to any voluntary disclosure by an employee, done in good faith, regarding an employment or company-related wrongful act or omission, malpractice, or irregularity which is based on his personal knowledge, information or belief.

Requirements for Protected Disclosures. The disclosure must be factual, specific, and material, related to a covered wrongful act or omission, malpractice or irregularity and must be supported by evidence. Moreover, the disclosing employee needs to comply with the following requirements to be entitled to the rights for Protected Disclosure under this Policy:

a. He/She discloses the information in good faith;
b. He/she discloses the information in writing, and signs the same under his/her name;
c. He/She does not knowingly make a false disclosure;
d. He/She executes a statement under oath and/or testifies, when asked to do so by the Company, in connection with the subject matter of the Protected Disclosure; and
e. He/She signifies in writing that he/she fully understands the provisions of this policy and requests the protection and remedies under this Policy.

Protected Disclosures made by any employee shall not be used as evidence by the Company in any action against such employee.

a. In cases where the party making the disclosure has a direct participation in the wrongful act or omission, malpractice, or irregularity, the disclosure shall be considered a Protected Disclosure only if the Whistleblowing Committee accepts the disclosure in writing.
b. In cases where the party making the disclosure has a direct participation in the wrongful act or omission, malpractice, or irregularity, and in case where the employee has a rank up to VP or higher but not a member of the Leadership Team, the approval of the disclosure as Protected Disclosure shall be obtained from the Whistleblowing Committee.
c. In cases where the party making the disclosure has a direct participation in the wrongful act or omission, malpractice, or irregularity, and in case where the employee is an officer, with a level of Vice-President or higher and member of the Leadership Team, the acceptance of the disclosure as a Protected Disclosure shall be elevated by the Whistleblowing Committee to the President and CEO for approval. Likewise, if the President and CEO makes the disclosure, but having a direct participation in the wrongful act or omission, malpractice, or irregularity, the acceptance of the disclosure as a Protected Disclosure shall be elevated to the Company's Board of Directors for approval in writing.

Whistleblower/ Disclosure	Approving Authority
Employees making the disclosure is not a member of the Leadership Team	Whistleblowing Committee
Employees making the disclosure is a member of the Leadership Team (Appendix A)	President and CEO
Disclosure involves loss of Company property, fraud, or any other loss of Company resources amounting to more than Five Million Pesos (P5,000,000)	President and CEO
Employee making the disclosure is the President and CEO	Board of Directors
Disclosure involves the President and CEO	Board of Directors

d. For avoidance of doubt, in cases under this Section, the disclosure shall not be considered a Protected Disclosure in the absence of a written acceptance by the Whistleblowing Committee.

Good Faith - honest intent to act without taking an unfair advantage over another person. The whistleblower must have a reasonable belief that the reported activity is true, and that the report is made with the honest intention of exposing wrongdoing or illegal activity. In other words, the whistleblower must not be motivated by personal gain or an ulterior motive.

Reportable Condition - refer to specific situations or circumstances that are considered important and should be reported to relevant parties, including management, regulatory authorities, or other stakeholders. This covers acts of negligence and acts related to performance of duties, acts of dishonesty and fraud, acts of unacceptable behavior and conduct, acts against decency and morals, criminal acts, acts against peace and order/ general safety/ health/ environment/ and security as defined in the Company's Code of Conduct, Company policies and practices, and laws of the Philippines.

Respondent - the person being charged for committing reportable conditions.

Retaliatory Action – any unjustified action taken by or on behalf of a person against a Whistleblower who reports in good faith, that causes or may cause adverse employment consequences to the Whistleblower, including but not limited to: discriminatory action; reprimand; punitive transfer; undue poor performance reviews; obstruction of the investigation; withdrawal of essential resources; adverse reports; attachment of adverse notes in the personnel file; ostracism; questions and attacks on motives; accusation of disloyalty and dysfunction; public humiliation; and denial of work necessary for promotion.

Conflict of Interest - a potential or actual conflict of interest occurs whenever a member of the Whistleblowing Committee, Investigation Team, Case Management Team or the Board of Directors has a personal or financial interest in the matter being reported, or has a relationship with the person or organization being reported that could influence objectivity. A conflict of interest exists even if no unethical or improper act results. A conflict of interest can create an appearance of impropriety that can undermine confidence in the investigation process and whistleblowing mechanism.

Hence, all persons to be involved including the Whistleblowing Committee, Board of Directors, Investigation Team and Case Management Team handling the reported incident shall accomplish a document attesting his/her freedom from potential or actual conflict of interest. Otherwise, shall not participate in any preliminary evaluation, hearing, investigation and decision on the incident which he/she has a conflict of interest.

SECTION 4: ROLES AND RESPONSIBILITIES

Audit Committee of the Board shall:

a. Approve the Whistleblowing Policy;
b. Oversee the integrity, independence and effectiveness of the Company's Whistleblowing Policy;
c. Approve request for Protected Disclosure if the President and CEO makes the disclosure, having direct participation in the wrongful act or omission, malpractice or irregularity; and
d. Oversee the investigation and decision on the whistleblowing reports.

Whistleblowing Committee shall perform its duties and responsibilities defined in the Whistleblowing Committee Charter.

The Whistleblowing Committee shall be composed of:

1. Chief People Officer (CPO)
2. Chief Compliance Officer (CCO)
3. Chief Legal Officer (CLO)
4. Chief Audit Executive (CAE)

Investigating Units shall:

a. Conduct fact-finding investigations on the whistleblowing case involving Company employee(s); and
b. Submit a written report to the Whistleblowing Committee regarding the findings on the investigation, including but not limited to the facts gathered, violations on the Code of Conduct, conclusion, and recommend actions to be taken on the case.

The units that can support the investigation and the nature of the reportable condition that can be assigned to them, but not limited to the following:

- Internal Audit
- People and Purpose
- Security
- Legal
- Compliance
- Fraud Operation
- Information Security Group

External Service Providers may also be called upon in case the concerns are assessed to be out of the expertise or capacity of the Committee members and/or Investigating Units(s).

SECTION 5: STATEMENT OF POLICIES AND GUIDELINES

1. Reporting

Reporting can be made via the following channels which access is limited to the Whistleblowing Committee:

Platform	ProActive Hotline
Email	whistleblowing@gcash.com

Any whistleblowing report must be made through the official whistleblowing channels of the Company. The Whistleblower may choose to identify himself or remain anonymous.

Whistleblowers are encouraged to include the following information, at the minimum, in the disclosure to facilitate investigation:

- description of the incident
- date, time and location of occurrence;
- duration of the incident happening;
- how the reporter become aware of the incident
- person(s) involved including their function or position in the Company;
- relationship with the person(s) involved; and
- other information to support the allegation such as documents, photos or video recording.

Whistleblower may report anonymously. The Whistleblower who files a report may choose to provide a manner by which he can be contacted without jeopardizing anonymity. The recipients of the report shall ensure confidentiality of information.

In the event that the Whistleblower withdraws his report, the investigation shall continue provided that the evidence gathered is sufficient.

If a Whistleblower makes allegations that are determined to be fabricated or malicious and persists in making them, a possible disciplinary or legal action may be taken against the Whistleblower, subject to relevant Company policies and procedures, and any applicable laws.

In the event that the Respondent resigns prior to the final resolution of the case, the investigation shall continue. Resignation of the Respondent is without prejudice to any appropriate action for matters committed during Respondent's tenure.

2. Preliminary Handling of the Report

The CAE and CPO shall receive the report and provide acknowledgement of receipt within three (3) business days from receipt. They shall perform initial assessment on the sufficiency of the information provided by the Whistleblower and to ascertain if the report meets the scope of this policy. The CAE and CPO may also communicate to the whistleblower via the whistleblowing channels in case additional information is needed. Results of the preliminary evaluation shall be escalated to the Whistleblowing Committee within five (5) business days from the date of report.

The CAE and CPO shall also provide the Whistleblower the status of the report via the whistleblowing channels.

A report shall be considered sufficient in form if:

- the Respondent is identified by his name and position;
- the charges are specified, including the relevant material facts (e.g. nature of incident, time and places of the incident, process involved, evidence, and other important matters necessary to establish the case);
- the report pertains to matter relevant to the business of the Company;
- It contains sufficient details and includes supporting documents to enable the Whistleblowing Committee to properly investigate the incident reported and take necessary actions.

Note that the sufficiency of the report refers solely to its format and structure, and not to the substantive content contained within.

The Committee shall review the recommendation and decide on whether it will close the case or pursue it further. The decision of the Committee including the reason behind it shall be minuted and filed.

3. Investigation

In case the Committee decides to pursue it further, the Committee may assign any of its members or the Investigating Unit(s) to gather information to establish veracity of the allegation.

Investigating Unit(s) shall conduct investigation in a discreet manner and in accordance with existing laws, rules, and regulations, applicable policies and procedures of the Company. During the investigation, the Investigating Unit shall gather evidence or probable cause that would support the case against the Respondent.

In case the Investigating Unit(s) finds the information lacking or not clear, it shall escalate to the CAE and CPO for the latter to communicate to the Whistleblower through the official whistleblowing platform or contact information provided by the Whistleblower.

The Investigating Unit(s) shall submit a report to the Whistleblowing Committee on the results of the investigation. The Whistleblowing Committee shall present to its members the report for appropriate action. The decision and reason for it shall also be minuted and filed. All supporting documentations shall be maintained and kept by the Whistleblowing Committee to ensure confidentiality.

In the event that a report involves an Employee who is a member of the Whistleblowing Committee or his/her subordinate, the said member shall not be allowed to directly handle the investigation in order to avoid the appearance of bias and conflict of interest.

4. Case Management

The Company's Code of Conduct and Company's policies on case management shall be followed in subjecting implicated employee(s) to disciplinary action and/or imposing corrective action or penalty. The Whistleblowing Committee shall be apprised on the result of case management and furnished copy of the Final Notice of Decision.

5. Reporting to the Audit Committee

The Whistleblowing Committee shall apprise the Audit Committee on a semi-annual basis the status of whistleblowing cases or more frequently as circumstances dictate. The Committee shall also report on the following statistics and other relevant matters, including but not limited to:

- Number of whistleblowing reports received
- Number of resolved whistleblowing reports
- Status of the open whistleblowing reports
- Summary of final resolutions

Additional information may be included in the report as may be necessary based on the request of the Audit Committee.

6. Protection Against Legal Action

No criminal, administrative, or civil action shall be commenced by the Company against a Whistleblower in relation to a Protected Disclosure and subject to the appropriate terms, conditions, and limitations, which shall depend on the nature of the disclosed act or omission, malpractice, or irregularity. The terms, conditions, and limitations of the protection and agreement between the Company and the Whistleblower may be agreed upon in writing.

7. Protection Against Retaliatory Action

Cases of retaliation against any Whistleblower may be reported through the Company's whistleblowing channels.

A Whistleblower shall be entitled to protection against any retaliatory action insofar as the protection or remedy is within the control of the Company and that the report was made in good faith. The protection does not extend to civil, criminal, or administrative actions by the Company or third parties. Further, GXI reserves the right to also report the said incident to relevant or appropriate regulatory authorities, if so warranted.

Any employee who attempts, performs, causes, or encourages any retaliatory actions against a Whistleblower who made the disclosure in good faith will be subjected to disciplinary action, including preventive suspension of up to thirty (30) days and/or dismissal, depending on the gravity of the case, without prejudice to other legal actions the Company may take.

The provisions of Company Code of Conduct including its penalties may also apply to all retaliatory actions, and may be considered as an aggravating circumstance.

8. Confidentiality

Except in cases where there is a necessity for the testimony of the Whistleblower or the disclosure of the identity of the Whistleblower is required under the law, a Whistleblower is entitled to absolute confidentiality as to his/her identity and the subject matter of the disclosure.

No person shall divulge any information that shall identify or tend to identify a Whistleblower nor reveal the subject matter of any disclosure to any unauthorized individuals or entities. A violation of this prohibition shall be punishable by either suspension of thirty (30) working days or dismissal, depending on the gravity of the case, without prejudice to other legal actions the Company may take.

The Whistleblowing Committee shall ensure confidentiality of the information and shall treat all reports including the identity of the Whistleblower and the Respondent confidentially and sensitively. The Whistleblower's identity will be kept confidential unless compelled by law to be revealed.

9. No Breach of Duty of Confidentiality

A Whistleblower who has an obligation to maintain confidentiality of confidential information, as defined by the Company, shall not be deemed to have committed a breach of such duty if he/she makes a disclosure in good faith of such confidential information to the Whistleblowing Committee.

10. Limitation on Rights and Protection for Whistleblowers

This policy shall not protect the Whistleblower from any actions which may be taken against him/her by the Company for wrongful conduct, poor work performance, or any other disciplinary action which is independent from or unrelated to the disclosure he/she has made pursuant to this Policy.

11. Data Retention and Disposal

All data, documents and reports in hard and electronic copies related to a whistleblowing report shall be turned over to the Whistleblowing Committee. It shall be maintained and safely stored for five (5) years from the date of report. If a case has been filed in court resulting from a whistleblowing report, records must be retained and safely kept beyond the 5-year retention period, until it is officially resolved, decided or terminated with finality.

Data retention, archival and disposal shall also comply with the Company's Data Retention, Archival and Disposal Guidelines.

12. Awareness and Education Campaign on Whistleblowing Policy

The Whistleblowing Committee shall ensure this policy will be cascaded to all employees of the Company after its approval, to ensure that they understand how to report concerns and protection provided under this Policy. Annual awareness campaign shall also be held for all Company employees.

13. Review of the Policy

The Whistleblowing Committee shall ensure this policy will be reviewed at least annually or as necessary. Significant changes shall be endorsed to the Audit Committee for approval.

Appendix I: Members of the Leadership Team

BANGIT, WINSLEY ROYCE FETROS / Wins
GONZALES, ROBERT CONRAD ORDANEZ / Robert
OLAÑO, JAN LESTER OCAMPO / Tek
ISIDRO, ANTHONY MARCELINO / Tony
REYES, OSCAR ENRICO AUDENCIAL JR. / Ren-ren
SY, MA. AURORA LIM / Pebbles
ZAMORA, ROWENA PARUNGAO / Rowie
TESTA, RONALD CABANTOG / Ron
ADRIANO, MARIA CORAZON / Atty. M / Maricor
CARAIG, ROLANDO VIRREY / Olan
SISON, MA. CEFERINA MACALINO / Atty. Cef
LAYUG, EDGARDO RIVERA JR./ Jong
TRINIDAD, ALBERTO CURNELIUS TIU / Neil