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# JACKSTONES, INC.

593 Antonio Drive, Bagumbayan, Taguig City 1630

<b><u>WHISTLEBLOWER POLICY</u></b>	Version No:
	Initial Issue Date:
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## Section 1: PURPOSE

Jackstones, Inc. ("Corporation") is committed to providing fair, transparent, responsible and accountable governance procedures and ensure full compliance with the applicable laws, rules, and regulations. The Board, Key Officers, members, employees, and all other stakeholders must exemplify the behavior and professional demeanor consistent with such laws, rules, and regulations, as well as the Corporation's applicable policies and procedures.

The purpose of the Whistleblower Policy ("Policy") is to enable any concerned person to report and provide information, anonymously if he/she wishes, and even testify on matters involving the acts or omissions of the Board, Key Officers, members, employees, and all other stakeholders, that are considered illegal, unethical, or against public policy.

The Policy shall provide procedures for the reporting of any actual or suspected violation of any law, rules, regulations, policies, or procedures against the Corporation and to provide protection for such persons against any form of retaliation for reporting such violations. The Policy shall also grant persons or entities with confidential direct access to either an independent director or a unit designed to deal with whistleblowing concerns.

## Section 2: SCOPE

This policy shall be applicable to employees of the Corporation, employees of third-party business partners, and other stakeholders of the Corporation, including their subsidiaries and affiliates.

## Section 3: DEFINITION OF TERMS

- A. **Reportable Condition** are matters that are considered as violations of the Corporation's policies, procedures, or which are considered as unlawful, illegal, immoral, or corrupt, or any risk or irregularity that may have an adverse effect on the Corporation. It covers, but is not limited to, the following:
- a. Ethical concerns;
  - b. Corrupt practices;
  - c. Nonfeasance, misfeasance, or malfeasance of laws or the Corporation's policies;
  - d. Such other matters that poses a risk affecting the Corporation.
- B. **Reporting Channel** refers to any means of communication and refers to any of the following:
- a. Company Website;
  - b. Face-to-Face meetings;
  - c. E-mail;
  - d. Mail;

- e. Telephone
- C. **Respondent** refers to any person subject of a complaint in the Whistleblowing Report.
- D. **Retaliation** refers to acts carried out by a Respondent in retaliation against a Whistleblower and may include, among others, acts of discrimination, harassment, intimidation, or adverse action.
- E. **Whistleblower** refers to any person who provides truthful information in good faith about any Reportable Condition as defined under this Policy.
- F. **Whistleblowing Report** refers to a complaint filed by a Whistleblower about a Reportable Condition.

#### **Section 4: PROCEDURE IN REPORTING, INVESTIGATION, AND EVALUATION OF WHISTLEBLOWING REPORTS**

- A. **Reporting Channels** - The Corporation shall establish a system for handling Whistleblowing Reports and shall be acted upon by management and investigated expeditiously by the Corporation. Such Whistleblowing Reports may be reported through the following channels:
  - a. Company Website: <http://jackstonesinc.com/index.php/message-us>
  - b. Face-to-Face Meetings: Duly appointed officer of the Corporation
  - c. E-mail: [investorrelations@jackstonesinc.com](mailto:investorrelations@jackstonesinc.com)
  - d. Mail: 593 Antonio Drive, Bagumbayan, Taguig City 1630
  - e. Telephone: +632 633 6113
- B. **Establishment of a Whistleblowing Committee** – Upon the receipt of any Whistleblowing Report, the Board of Directors shall appoint a Whistleblowing Handling Officer which shall conduct investigations and take action in resolving the Report. Such Officer shall have the power to appoint not more than two (2) other members from the Board of Directors to constitute the Whistleblowing Committee. The Committee shall be composed of members who are not the subject of the said report and are disinterested in the outcome or the resolution of the Whistleblowing Report.
- C. **Duties and Responsibilities of the Whistleblowing Committee** – The following are the duties and responsibilities of the Whistleblowing Committee:
  - a. Review the Whistleblowing Reports submitted through any of the Reporting Channels as provided under this Policy;
  - b. Acknowledge receipt of the Whistleblowing Reports and provide updates to the Whistleblower on the status and proposed course of action in resolving the said Reports;
  - c. Investigate the truth and veracity of the Whistleblowing Reports and coordinate with the relevant officers or members of the Corporation in order to gather the information needed to decide the Committee's course of action;
  - d. Upon verification of the truth and veracity of the Whistleblowing Report, provide the Respondent with a copy of the allegations against him/her and require the Respondent to submit his/her comments on the same within a period of fifteen (15) days from the receipt of the Report.
  - e. Upon receipt of the comments of the Respondent, provide a copy of the same to the Whistleblower by providing a physical hardcopy of the Report and the comments of the Respondent and provide the Whistleblower with an opportunity to

submit a reply to the comments within a period of fifteen (15) days from the receipt of the comments.

- f. Resolve all Whistleblowing Reports based on the information gathered and the comments/ replies provided by the parties, with due consideration of the Company's welfare above all.
  - g. Monitor all Whistleblowing Reports, the actions taken, and all submissions or comments made by the parties concerned.
- D. **Anonymous Reporting** – The Corporation shall accept Whistleblowing Reports made anonymously. The Whistleblower who files a Report anonymously may choose to provide a manner by which he/she can be contacted without jeopardizing his anonymity. Such means shall include, but is not limited to using an e-mail, a prepaid mobile number, and the like. Such Anonymous Reporting shall be limited to the identity of the Whistleblower. All Respondents must still be clearly identified by their full names and positions.
- E. **Withdrawal of Whistleblower Report** – In the event that the Whistleblower withdraws the Whistleblower Report, the investigation shall continue provided that the evidence gathered is sufficient.
- F. **Resignation of Respondent Pending Investigation** – Resignation of the Respondent during the investigation stage or prior to the issuance of a resolution on the Whistleblower Report does not prevent the Whistleblowing Committee from continuing the investigation.
- G. **Confidentiality** – The Corporation shall ensure confidentiality of all information arising from the Whistleblower Report. It shall treat all reports, including the identity of the Whistleblower and the Respondent, in a confidential and sensitive manner. The identity of the Whistleblower will be kept confidential, unless compelled by law or by the Courts to be revealed, or unless the Whistleblower authorized the disclosure of his/her identity.
- H. **Protection of a Whistleblower against Retaliation** – The Whistleblower shall be protected against any form of retaliation from the moment a Whistleblower Report is filed with the Reporting Channels as provided under this policy.

Any act of Retaliation against the Whistleblower shall be taken cognizance by the management so long as the report is made in good faith.

The management shall extend all possible assistance to the Whistleblower as may be required in order to protect him/her from further acts of Retaliation.

- I. **Untrue Allegations** – If a Whistleblower makes allegations that are later on determined from investigation to be fabricated or malicious falsehoods, and/or he/she persists in making them, legal action may be taken against him by the Corporation.

## Section 5: EFFECTIVITY

This Policy shall take effect upon approval of the Board of Directors.