

	<b>POLICY IN WHISTLE BLOWER</b>		Doc. No.	HRD -	
			Rev. No.		
			Eff. Date	Immediately	
			Page	1	of

**POLICY:**

All employees have a moral obligation to disclose to the management all illegal or dishonest acts that they may have discovered; or employees who is a party to a commission of the said illegal acts and wanted to redeem themselves.

**OBJECTIVE:**

To prevent an illegal or dishonest acts from occurring, if already existing, to end the said illegal activities; consequently, to take legal actions against these misguided elements.

**DEFINITION OF TERM:**

ILLEGAL ACTS is an act as defined in our Revised Penal Code, therefore, these are criminal offenses punishable by law. These illegal acts are comprised of qualified theft, misappropriation, embezzlement, falsification and other illegal acts as defined by law.

**PROCEDURE:**

1. The employee who has personal knowledge of the illegal acts must immediately inform his immediate superior by submitting a written report and to attached therein pieces evidence available. The immediate superior must conduct a discreet internal investigation to ensure that the disclosure of the whistleblower is solid and devoid of any malicious intent to just discredit the person being reported. Any fabricated report shall be subject to a disciplinary action. If information after validation hold a truthfulness, the report shall be cascaded to the Human Resources Manager by submitting the written report of the whistleblower and the result of the internal investigation conducted by the immediate superior.
2. The HRD shall initiate an investigation by interviewing the whistleblower (identity must be protected) and this does not preclude the discreet disclosure of information in order to collect all pertinent information related to the case.
3. Thereafter, the HRD shall prepare a complete report for submission to the office of the COO, stating all the facts and circumstances. To make a recommendation on which directions will be pursued.
4. After approval of the recommendation, the HRD shall request an explanation in writing from the person who allegedly committed the said illegal acts. This explanation must be provided within Five (5) days from receipt thereof. However, in observation of the lawful rights of the employee to know his accuser, the identity of the whistleblower shall be disclosed.
5. This explanation shall be assessed by the HRD.

6. The evaluation shall be prepared by the HRD based on the written explanation and other testimony presented during the Administrative Conference. For the purpose of this policy, Administrative Conference shall refer to a venue wherein the concerned employee can further defend his/her side before any penalty or fine is being imposed against him/her resulting from the reported complaint of verbal abuse.
7. Any penalty decided shall be in accordance with the existing company rules and regulations and recorded on the offending individual's 201 or personnel file.
8. However, should it become imperative to institute legal action against the employee in protection of the company's interest due to the considerable damage the company has suffered resulting from the illegal acts, the company may file a criminal case against the employee's involved.

**RECORD:**

All reports, notes and decisions shall be maintained in confidential file to protect the interest of all parties.


**COVERAGE:**

All employees of Value Care Health Systems, Inc.

*Effectivity: Immediately*

*Date prepared: December 2019*

*Recommending approval:*

  
Reynaldo M. Magdulot  
Head – Operations and ACCUSA

*Approved by:*

  
Armando S. Macalino  
EVP/COO