

CLARK INTERNATIONAL AIRPORT CORPORATION

WHISTLEBLOWING POLICY

1. **STATEMENT OF POLICY.** The Clark International Airport Corporation (CIAC) shall promote transparency, accountability and responsibility in the conduct of its operations with outmost degree of professionalism and effectiveness.

The Directors, Officers and Employees of CIAC shall conduct the affairs, operations and business of the Corporation in full compliance with applicable laws, rules and regulations. As public servants, the Directors, Officers and Employees shall exemplify the behavior and professional demeanor consistent with such laws, rules, regulations, policies and procedures.

CIAC shall also promote a reporting mechanism that would encourage employees or external parties to report serious misconduct and unethical work habit; without fear of reprisal, discrimination or adverse consequences.

2. **PURPOSE.** The purpose of this policy is to enable any concerned individuals to report and provide information, anonymously if opted to, and testify on matters involving acts and omissions of the CIAC Directors, Officers and Employees that are illegal, unethical, contrary to good governance principles, public policy and morals, promoting unsound and unhealthy business practices, and are grossly disadvantageous Corporation.
3. **COVERAGE.** This Policy shall be applicable to all CIAC Directors, Officers and Employees including those occupying co-terminus or contractual positions.
4. **REPORTABLE CONDITIONS.** Whistleblowers may report to the CIAC such acts or omissions that are illegal, unethical, contrary to good governance principles, public policy and morals, promoting unsound and unhealthy business practices, and are grossly disadvantageous to the CIAC, such as, but not limited to:

- (a) Abuse of Authority;
- (b) Bribery;
- (c) Conflict of Interest;
- (d) Destruction/Manipulation of Records;
- (e) Fixing;
- (f) Inefficiency;
- (g) Making False Statements;
- (h) Malversation;
- (i) Misappropriation of Assets;
- (j) Misconduct;
- (k) Money Laundering;
- (l) Negligence of Duty;
- (m) Nepotism;
- (n) Plunder;
- (o) Receiving a Commission;
- (p) Solicitation of Gifts;
- (q) Taking Advantage of Corporate Opportunities;
- (r) Undue Delay in Rendition of Service;
- (s) Undue Influence; and
- (t) Violation of Procurement Laws.

Whistleblowers may also report such other acts or omissions that otherwise involve violations of the following laws, rules and regulations:

- (a) R.A. No. 6713, "Code of Conduct and Ethical Standards for Public Officials and Employees";
- (b) R.A. No. 3019, "Anti-Graft and Corrupt Practices Act";
- (c) R.A. No. 7080, as amended, "The Plunder Law";
- (d) Book II, Title VII, "Crimes Committed By Public Officers, The Revised Penal Code";
- (e) Executive Order (E.O.) No. 292, s. 1987, "Administrative Code of 1987";
- (f) R.A. No. 10149, the "GOCC Governance Act of 2011";
- (g) GCG M.C. No. 2012-05, "Fit and Proper Rule";
- (h) GCG M.C. No. 2012-06, "Ownership and Operations Manual Governing the GOCC Sector";
- (i) GCG M.C. No. 2012-07, "Code of Corporate Governance for GOCCs";
- (j) Violations of the Charter of the GOCC; and
- (k) Other GCG Circulars and Orders, and applicable laws and regulations;

5. CIAC WHISTLEBLOWING WEB PORTAL. - The CIAC shall establish a whistleblowing web portal at the corporation's official website (<http://crk.clarkairport.com>) which shall serve as its primary reporting channel for whistleblowers. This reporting channel is an online-based platform by which whistleblowers may securely submit reports electronically while at the same time ensuring their anonymity and the confidentiality of their reports. Whistleblowers are encouraged to utilize this online reporting channel.

6. ALTERNATIVE REPORTING CHANNELS. Whistleblowers may also submit whistleblowing reports to the CIAC through the following alternative reporting channels

- (a) Face-to-Face Meeting: with CIAC Officers and Employees
- (b) Email: publicaffairs@clarkairport.com
- (c) Mail: Corporate Office Bldg., Civil Aviation Complex, Clark Freeport Zone, Pampanga, Philippines 2023
- (d) Telephone: (+63) 45 599-2888 to 92; (+63) 45 599-2895 to 97; (+63) 45 499 - 4467 to 68

7. CONFIDENTIALITY. Except when the whistleblower does not invoke anonymity and/or confidentiality when invoking this policy, the CIAC shall ensure confidentiality of all information arising from whistleblowing reports submitted pursuant to this Policy. It shall treat all reports, including the identity of the whistleblower and the person/s complained of, in a confidential and sensitive manner. The identity of the whistleblower will be kept confidential, unless compelled by law or the Courts to be revealed, or unless the whistleblower authorized the release of his/her identity.

8. PROTECTION OR A WHISTLEBLOWER AGAINST RETALIATORY ACTS. Retaliatory acts against whistleblowers who submit whistleblowing reports in good faith shall not be tolerated by the CIAC which shall extend all possible assistance to the whistleblower under the law and given the circumstances. 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 adversely affect the rights and interests of the whistleblower.

9. UNTRUE ALLEGATIONS. If a whistleblower makes allegations that are determined to be fabricated or malicious falsehoods, and/or he/she persists in making them, legal action may be taken against him by the CIAC.

10. HANDLING OF WHISTLEBLOWING REPORTS.

10.1 Filing of Whistleblowing Reports. All whistleblowing reports must be submitted to the CIAC through the whistleblowing web portal at the CIAC website <http://crk.clarkairport.com> or through any of the Alternative Reporting Channels identified in paragraph 6 of this Policy.

10.2 Investigation by the CIAC Administrative Committee. All whistleblowing reports will be evaluated and investigated by the CIAC Administrative Committee (AdCom) which reserves the right to disregard reports that are vague, ambiguous, patently without merit, or are simply made with malicious intent to tarnish the name and reputation of the person/s complained of.

The CIAC AdCom shall have the primary task of implementing the provisions of this Policy and investigating all whistleblowing reports submitted pursuant thereto.

The CIAC AdCom is hereby authorized to promulgate such regulations and protocols that will facilitate the full implementation of this policy.

11. CIAC ACTION ON WHISTLEBLOWING REPORTS.

11.1 In case the respondent is a Assistant Vice President, Manager, Assistant Manager, Supervisor or Rank-and-File Employee of CIAC, the AdCom shall submit its report to the MANCOM who shall either dismiss the case for want of palpable merit or enforce the appropriate sanctions against the respondent.

11.2 In case the respondent is a Vice President, the AdCom shall submit its report to the MANCOM who shall review and endorse the same to the Board of Directors who may either dismiss the case for want of palpable merit or enforce the appropriate sanctions against the respondent.

11.3 In case the respondent is a member of the Board of Directors, the AdCom report shall be coursed through the MANCOM and submit it to the Board of Directors who shall either dismiss the case for want of palpable merit or endorse it to the DOTC Secretary for appropriate action.

12. DUTY OF CIAC MIS/GIS DEPARTMENT & the ADCOM. The CIAC MIS/GIS Department is hereby directed to establish until October 2016 an online link between the web portals for whistleblowing of both CIAC and GCG. The AdCom, on the other hand, is required to recommend within the year 2016 the appropriate systems, working environment, and regulations that would promote whistleblowing, as well as the protection of whistleblowers against retaliatory actions mentioned in paragraph 8 of this Policy.

13. SEPARABILITY CLAUSE. In case any provision in this Policy shall be declared invalid, illegal, unenforceable, or inconsistent with the GCG Memorandum Circular on Whistleblowing, the validity, legality and enforceability of the remaining provisions shall not in any way be affected or impaired.

14. EFFECTIVITY CLAUSE. This Policy shall take effect immediately upon approval by the CIAC Board of Directors and its publication in CIAC website.