	WHISTLEBLOWING POLICY	Version No.	1.0
		Page	Page 1 of 6
RASLAG CORP.			

Version	:	1.0
Effectivity Date	:	April 8, 2024
Reviewed and Endorsed by	:	Audit Committee
Approved by	:	Board of Directors
Approval Date	:	April 8, 2024

**RASLAG CORP.
WHISTLEBLOWING POLICY**

I. POLICY AND COVERAGE


RASLAG adopts this Whistleblowing Policy (the “Policy”) to empower and provide a mechanism for any concerned individual to report, without fear of retaliation, actions or omission of the Directors, Officers, and Employees of RASLAG, that are illegal, unethical, violate good governance principles, are against public policy and morals, promote unsound and unhealthy business practices or are grossly disadvantageous to RASLAG (a “Report”). This Policy shall be applicable to all officials and employees of RASLAG, whatever status of employment, whether permanent or temporary, including the members of the Board of Directors.

Whistleblowing is the disclosure of and/or giving of evidence or information that a Whistleblower reasonably believes constitutes Reportable Condition/s which is/are illegal, unethical, violate good governance principles, are against public policy and morals, promote unsound and unhealthy business practices, are grossly disadvantageous to RASLAG.

II. INFORMATION THAT MAY BE SUBJECT OF A REPORT

Each of the following constitutes a “Reportable Condition”.

1. violation of law or government regulation related to the operations of RASLAG;
2. misuse or misappropriation of RASLAG’s assets;
3. fraudulent reporting or accounting practice;
4. violation of the Securities Regulation Code (including insider trading);
5. violation of the Manual of Corporate Governance;
6. violation of the RASLAG’s Related Party Transactions ;
7. violation of the RASLAG’s Code of Business Conduct and Ethics;
8. willful failure to disclose any conflict of interest situation;
9. any conduct that poses a serious risk to public safety, health, or the environment;

	WHISTLEBLOWING POLICY	Version No.	1.0
		Page	Page 2 of 6
RASLAG CORP.			

10. any concealment, or attempt to conceal any of the above;
11. any other conduct similar or related to the foregoing.

III. PROTECTION FROM RETALIATION

The person making a Report (the “Whistleblower”) shall be protected from any retaliatory act in connection with any Report made in good faith, with a belief in the truth of the Report that a reasonable person in the Whistleblower's situation could have believed based upon the facts. Such retaliatory acts may include, but are not limited to the following:


- a. discrimination or harassment in the workplace;
- b. demotion;
- c. reduction in salary benefits;
- d. termination of contract;
- e. evident bias in the performance evaluation; and
- f. any acts or threats that adversely affect the rights and interests of the Whistleblower

If a Report was made in good faith, but proven to be untrue after due investigation, no action shall be taken against a Whistleblower. RASLAG will take all reasonable steps within its powers to ensure that a Whistleblower suffers no retaliation. If the concern was, however, made frivolously, maliciously or for personal gain, disciplinary action shall be taken by RASLAG against a Whistleblower including termination, if the Whistleblower is an employee. A Whistleblower shall be deemed to be communicating in good faith if there is a reasonable basis for communication of unethical and improper practices or any other alleged wrongful conduct. Good faith shall be deemed lacking when a Whistleblower does not have personal knowledge of a factual basis for the Report or where a Whistleblower knew or reasonably should have known that the Report about the unethical and improper practices or alleged wrongful conduct is malicious false or frivolous. This Policy may not be used as a defense by a Whistleblower against whom an adverse personnel action has been taken independent of any disclosure of information by him/her and for legitimate reasons or cause under RASLAG's rules and policies.

IV. PROCEDURES IN HANDLING WHISTLEBLOWING REPORTS

1. Any person may send or communicate a Report to the HR Manager of any party designated by the Audit Committee through any of the following channels:

Email	rvlumberio@raslag.com.ph
-------	--

	WHISTLEBLOWING POLICY	Version No.	1.0
		Page	Page 3 of 6
RASLAG CORP.			


A Whistleblower who files a Report anonymously may choose to provide a manner by which he/she can be contacted without jeopardizing his/her anonymity. Such means shall include, but not limited to using an e-mail and the like.

2. The Report must be in writing and shall contain the following:
 - i. The respondent must be clearly identified by his/her full name and position;
 - ii. The specific conditions, actions and/or omissions being complained about, as well as the corresponding laws, rules and regulations allegedly violated;
 - iii. Documentary and other evidence to support the allegations.
3. The Report shall be endorsed by the HR Manager of any party designated by the Audit Committee to the Audit Committee (the "Committee") if after initial evaluation of the HR Manager of any party designated by the Audit Committee, it is determined that the information provided may constitute a Reportable Condition. If the HR Manager of any party designated by the Audit Committee determines that such information does not qualify as a Reportable Condition, the same shall be treated as ordinary complaint which will be acted on accordingly in accordance with applicable RASLAG policy, or existing rules and regulations.

If the HR Manager of any party designated by the Audit Committee determines that a Report contains facts which will constitute a violation of Republic Act No. 11313 or the Safe Spaces Act, including any amendments thereto, the Report shall be referred to the Committee on Decorum and Investigation, for proper action.


4. The Committee reserves the right to disregard Reports that are vague, ambiguous, patently without merit, or are clearly harassment complaint against the respondent. The Committee shall communicate its initial findings on such Reports to the Whistleblower who will be given the opportunity to substantiate the same. If the Whistleblower fails to do so, the matters raised in the Reports will be considered closed and terminated.
5. If the Committee finds the Report to be sufficient in form and substance, the Committee shall conduct an investigation, part of which will involve informing the respondent of the allegations against him/her and requiring the respondent to submit comments within fifteen (15) calendar days from receipt thereof.

The Committee shall furnish the Whistleblower a copy of the comments of the Respondent, and shall give him/her the opportunity to provide more information or controverting evidence within fifteen (15) calendar days from receipt of the

	WHISTLEBLOWING POLICY	Version No.	1.0
		Page	Page 4 of 6
RASLAG CORP.			

copy of the respondent's comments. If the Whistleblower submits additional information or evidence, the Committee shall likewise give the respondent the opportunity to submit rebutting evidence within ten (10) calendar days from receipt thereof.

6. If the Committee is satisfied that all the information and evidence necessary for the resolution/decision of the Report are ready on hand, it may proceed to draft the corresponding resolution/decision of the Report and submit its recommendation to the President, Board of Directors or HR Manager of any party designated by the Audit Committee, as applicable.
7. The final action on the Report shall be as follows:
 - a. In case of a Report filed against RASLAG's employees, the HR Manager of any party designated by the Audit Committee, in consideration of the resolution/decision and/or recommendation of the Committee, may pursue any of the following actions:
 - i. dismiss the Report for want of palpable merit or if the response of the respondent is found to be adequate;
 - ii. impose disciplinary action or sanction against the respondent pursuant to existing rules and regulations; or
 - iii. enjoin Management to comply with applicable laws or jurisprudence and/or undertake corrective measures to address the matters raised in the Report.
 - b. In case of a Report filed against any member of the Board of Directors, who is not an Independent Director, the Committee shall submit its recommendation to all of the Independent Directors forming an Ad Hoc Committee solely for that purpose for appropriate action.
 - c. In case of a Report filed against an Independent Director, the Committee shall submit its recommendation to the President for appropriate action.
 - d. In case of a Report filed against any member of the Committee, such member shall not be allowed to participate in the deliberations and decision by the Committee on the subject Report.

	WHISTLEBLOWING POLICY	Version No.	1.0
		Page	Page 5 of 6
RASLAG CORP.			

8. Any official or employee who has personal knowledge of any matter pertaining to a protected disclosure shall, if called upon, have the obligation to testify in any proceedings arising from such protected disclosure. Any official or employee who testifies in any proceedings arising from a protected disclosure shall be accorded the same protection against retaliatory actions.
9. A Whistleblower shall be entitled to commendation, promotion, and/or other form of incentive as may be deemed appropriate.

V. CONFIDENTIALITY


All Reports shall be treated in confidence by any Director, officer or employee who comes across the information relating to the Report, and the identity of the Whistleblower shall be protected and shall not be disclosed: (i) without the Whistleblower's written consent; or (ii) unless the Whistleblower's testimonial evidence is needed by any legislative or administrative proceedings or inquiry. RASLAG's duty to maintain anonymity shall cease where the Whistleblower has disclosed the Report or the information subject of the Report to third parties.

VI. ANONYMOUS REPORTS

A Report shall not be disregarded for the sole reason that the author of the Report is not identified. Reports made anonymously shall be investigated appropriately taking into consideration the gravity and credibility of the information provided in the Report and the likelihood of validating such information using other reliable sources. Persons responsible for investigating a Report shall have the duty to maintain the anonymity of the Whistleblower.

VII. REMEDIES AND SANCTIONS

1. Any person who (a) submitted a Report in bad faith containing any material false allegation; or (b) presented fabricated or falsified evidence, shall be subject to disciplinary or legal action pursuant to the policies and procedures of RASLAG.
2. Any official or employee who violates the protection of confidentiality of a protected disclosure and of the confidentiality of the proceedings shall be liable for disciplinary sanctions.
3. Any official or employee who does, causes, or encourages retaliatory actions (as stated in this Policy), against a Whistleblower, or persons believed or suspected to be one, and/or those officials and employees supporting him/her, or any of his/her relatives within the fourth civil degree of consanguinity or affinity, shall be

	WHISTLEBLOWING POLICY	Version No.	1.0
		Page	Page 6 of 6
RASLAG CORP.			

immediately subjected to administrative and/or criminal proceedings, and in appropriate cases, immediately placed under preventive suspension.

4. Any official or employee under obligation to report a disclosure under this Policy, or who fails to act thereon or cause an investigation thereof, shall be liable for disciplinary action.
5. Any official or employee, who fails or refuses to testify, or to continue to testify, or who adversely varies his/her testimony, without just cause, in any proceedings arising from a protected disclosure, shall be liable for disciplinary action.

VIII. DISSEMINATION OF THE POLICY

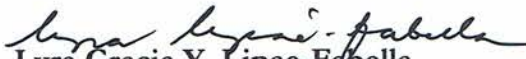
The HR Manager of any party designated by the Audit Committee shall be responsible for the dissemination and communication of this Policy, and to ensure that each employee and officer upon hiring and on an annual basis thereafter acknowledges in writing to have read the policy and to abide by the terms thereof. Management shall be responsible for the dissemination and communication of this Policy to the member of the Board of Directors and RASLAG's suppliers, business partners, contractors or sub-contractors. This policy shall be made available in RASLAG's website.



Peter G. Nepomuceno
Chairman of the Board



Daniel Gabriel M. Montecillo
Audit Committee Chairman



Lyra Gracia Y. Lipae-Fabella
Compliance Officer