WHISTLEBLOWING AND NON-RETALIATION POLICY

Reliable Insurance Brokers, Inc.

Section 1: Policy Statement

Reliable Insurance Brokers, Inc. (the "Company") upholds the highest standards of integrity, transparency, and accountability in all its business dealings. The Company encourages employees and stakeholders to report, in good faith, any suspected misconduct, fraud, corruption, or violation of laws, regulations, or internal policies.

This Policy ensures that such reports are treated seriously, handled confidentially, and investigated objectively — with full protection from any form of retaliation.

Section 2: Purpose and Objectives

The purpose of this Policy is to establish a clear and confidential process for reporting any actual or suspected wrongdoing within the Company. Its objectives are to:

(a) Encourage the disclosure of concerns involving fraud, corruption, unethical behavior, or regulatory non-compliance;
(b) Protect whistleblowers from retaliation or unfair treatment;
(c) Ensure fair, timely, and independent investigation of reports; and
(d) Strengthen corporate governance and stakeholder confidence.

Section 3: Scope

This Policy applies to all directors, officers, employees, agents, consultants, suppliers, service providers, and any other person or entity dealing with the Company.

Section 4: Definitions

- Whistleblower – Any person who, in good faith, reports a concern covered by this Policy.
- Whistleblowing – The act of disclosing information about misconduct or violations that affect the Company or its stakeholders.
- Good Faith – Honest intention to report a genuine concern, without malice or ulterior motive.
- Retaliation – Any adverse action, discrimination, or harassment taken against a whistleblower because of a report made in good faith.
- Irregularity or Misconduct – Includes, but is not limited to, fraud, corruption, bribery, theft, falsification of records, misuse of assets, conflict of interest, regulatory violations, or gross negligence.

Section 5: Guiding Principles

(a) Reports must be made in good faith and supported by sufficient details to allow proper assessment.
(b) The identity of the whistleblower and the information disclosed shall be kept confidential to the fullest extent possible.
(c) Anonymous reports may be accepted if sufficient information is provided for verification.
(d) Retaliation against any whistleblower or participant in an investigation is strictly prohibited.
(e) Malicious or knowingly false reports may result in disciplinary or legal action.

Section 6: Reporting Channels

Whistleblowers may file their reports through any of the following secure and confidential channels:

(a) **Compliance Officer** – via direct report or email at compliance@reliable-insurance.ph
(b) **President and Chief Executive Officer** – via official company correspondence
(c) **Chairperson, Audit and Risk Committee** – for serious or sensitive matters involving senior management
(d) **Compliance Email** – compliance@reliable-insurance.ph

Reports must contain the nature of the concern, names of involved persons (if known), dates or periods of occurrence, and supporting evidence, if any.

Section 7: Whistleblowing Procedure

(a) **Submission** – Whistleblower submits report via any reporting channel.
(b) **Acknowledgment** – The Compliance Officer acknowledges receipt within five (5) working days.
(c) **Preliminary Assessment** – The Compliance Officer reviews the report to determine scope, validity, and possible course of action.
(d) **Investigation** – Valid reports are investigated in coordination with relevant units (Internal Audit, HR, or Legal, as appropriate).
(e) **Reporting to the Audit Committee** – Material findings and recommendations are submitted to the Audit Committee for review and oversight.
(f) **Resolution** – Corrective actions are implemented, and the whistleblower is notified of the outcome, if contactable and appropriate.

Section 8: Confidentiality and Autonomy

All reports, records, and related communications shall be treated as strictly confidential. Disclosure of a whistleblower's identity without consent is prohibited unless required by law or necessary to conduct a fair investigation.

Section 9: Non-Retaliation Protection

Reliable strictly prohibits retaliation in any form against whistleblowers who act in good faith. This protection covers demotion, harassment, termination, or any form of discrimination.

Section 10: Investigation and Reporting

(a) The Compliance Officer shall oversee the conduct of investigations and maintain a log of all whistleblowing reports received.
(b) Complex or high-risk cases shall be referred to the Audit and Risk Committee.
(c) Results of investigations shall be documented and reported to the Board of Directors through the Audit and Risk Committee.
(d) Records shall be securely maintained and made available for regulatory review upon request.

Section 11: Roles and Responsibilities

(a) **Board of Directors** – Approves this Policy and ensures its effective implementation.
(b) **Audit and Risk Committee** – Oversees the whistleblowing framework, reviews reports, and ensures independence in handling cases.
(c) **Compliance Officer** – Administers the Policy, receives reports, conducts investigations, and maintains records.
(d) **Internal Audit** – Provides assurance and may assist in investigation or validation of reported concerns.
(e) **Human Resources** – Enforces disciplinary action when warranted and ensures non-retaliation.

Section 12: Communication and Awareness

The Company shall promote awareness of this Policy through employee orientations, compliance briefings, and corporate communications. The Policy shall be published on the Company's website under the Corporate Governance > Governance Policies section and made accessible to all stakeholders.

Section 13: Policy Review

This Policy shall be reviewed every two (2) years or earlier as may be necessary to align with updated regulations, best practices, or organizational changes. Proposed revisions shall be endorsed by the Compliance Officer and approved by the Board of Directors.

Section 14: Effectivity and Approval

This Whistleblowing and Non-Retaliation Policy is effective upon approval by the Board of Directors of Reliable Insurance Brokers, Inc.

All employees and officers are expected to familiarize themselves with and strictly observe this Policy.

This Whistleblowing and Non-Retaliation Policy of Reliable Insurance Brokers, Inc. was adopted by the Board of the Company on 25 June 2026 at Mandaluyong City.

Attest:

FELICISIMO M. NACINO, JR.
Chairman of the Board

SUSAN N. KONIG
Assistant Corporate Secretary