	Document Title	Whistleblower Policy			
	Organizational Unit	AC Logistics Group of Companies			
Document No.	ACL-WBP	Restriction	Confidential	Page 1 of 4	
Last Revision Date	31 July 2023 (AHI) 9 August 2023 (ACL)	Effective Date	1 January 2025	Version	01

1.0 Introduction

INTEGRITY is a core value of AC Logistics Holding Corporation (the “Company”) and its subsidiaries (collectively, the “Group”). It means doing the right thing and being accountable for one’s actions. The Group uses transparency to pursue integrity and is committed to the highest standards of openness, probity, and accountability. The Group has zero tolerance for unethical business practices or conduct.

In line with this, the Group adopts this **WHISTLEBLOWER POLICY** (the “Policy”) to encourage directors, officers, employees, suppliers, business partners, contractors, and sub-contractors to raise serious concerns about perceived wrongdoing, malpractice, or risk involving the Group.

2.0 Purpose of the Policy

2.1 The purpose of this Policy is to raise awareness among AC Logistics employees about the importance of integrity in all corporate transactions and matters. It promotes adherence to Corporate Governance policies and values and the overall well-being of the Group.

2.2 This Policy encourages employees to responsibly raise serious concerns internally, rather than ignoring issues or whistleblowing publicly.

2.3 It provides guidance on whistleblowing and outlines the procedure for reporting concerns about misconduct, inappropriate behavior, or irregularities that could harm the Group’s interests and reputation, using a confidential reporting channel.

2.4 The Policy establishes a formal mechanism for directors, officers, employees, suppliers, business partners, contractors, sub-contractors, and other third parties to raise concerns. It assures that whistleblowers acting in good faith will be protected from reprisals, harassment, disciplinary action, or victimization.


2.5 It is not designed to further personal disputes or question financial or business decisions made by the Group in good faith. It should not be used to reconsider staff matters already addressed under existing grievance procedures.

3.0 Scope and Coverage

The Policy applies to all the Company personnel, including the Board of Directors, officers, permanent and temporary employees, advisors, consultants, third party business partners, suppliers, service providers, and other stakeholders of the Group, its subsidiaries, and affiliates, as it pertains to the activities of the Group and its representatives.

4.0 Types of Concern Covered

- (a) violation of the Corporation’s policy against corrupt practices;
- (b) misuse or misappropriation of Corporation’s assets;
- (c) fraudulent reporting or accounting practice;
- (d) violation of the Corporation’s policy against unlawful insider trading;
- (e) violation of the Securities Regulation Code;
- (f) violation of the Manual of Corporate Governance;
- (g) conflict of interest situation;
- (h) any conduct that poses a serious risk to public safety, health, or the environment;
- (i) any unethical or illegal conduct; or
- (j) any other conduct similar or related to the foregoing.

	Document Title	Whistleblower Policy			
	Organizational Unit	AC Logistics Group of Companies			
Document No.	ACL-WBP	Restriction	Confidential	Page 2 of 4	
Last Revision Date	31 July 2023 (AHI) 9 August 2023 (ACL)	Effective Date	1 January 2025	Version	01

5.0 Confidentiality

The Group shall make every effort to maintain the confidentiality of the Whistleblower's identity unless disclosure is required by law, regulation, or legal proceedings. Whistleblowers are encouraged to report concerns directly through the Group's official channels to ensure confidentiality and protection.

6.0 Protection from Retaliation

The Whistleblower will be protected from reprisals, harassment or unwarranted disciplinary action or victimization for raising genuine or relaying information (the "Report") in good faith, believing the disclosure to be true and not made maliciously or for personal gain. Hereafter, the disclosure, raising of a concern, or relaying of information, as well as the concern raised or disclosed or the information provided, is hereafter referred to as "Report".

Any harassment or retaliatory action shall be subject to disciplinary or legal action according to the Group's relevant policies and procedures, and applicable laws, even if the concerns raised are later dismissed.

If a whistleblower experiences retaliation, they may report it to the Ethics Committee through the same whistleblowing channels. The Ethics Committee shall prioritize such complaints, conduct a separate investigation, and implement appropriate measures to prevent further retaliation.

7.0 Reporting Channels


The Whistleblower may send or communicate a Report through the following channels:

Channel	Operator
Face-to-face meetings	<ul style="list-style-type: none"> Any member of the AC Logistics Ethics Committee Any responsible Officer of the Company or Mancom Members.
E-mail	<ul style="list-style-type: none"> whistleblower@aclogistics.com.ph or the proper superior officer, department head, or Mancom members of Subsidiary's Whistleblowing Investigative Group's email address
Mail	<ul style="list-style-type: none"> Office of the AC Logistics President and CEO, Penthouse, Makati Stock Exchange Building, Ayala Triangle, Ayala Avenue, Makati City, Metro Manila 1226
QR Code	<ul style="list-style-type: none"> The QR code will be made available in all whistleblower communication materials, including posters, email advisories, and information bulletins, as part of the dissemination of the WB policy to guide reporters. Scanning the QR code directs users to the Whistleblower Report Form, which is also available in our website.

Note: For mail and email reporting, the Whistleblower Report Form is available on the AC Logistics Company website (<https://www.aclogistics.com.ph>) and the GreatDay System (for employees).

8.0 Investigation

Investigations must be conducted fairly and without prejudice to establish facts and determine the validity of accusations of wrongdoing, fraud, and corruption. The interests and reputations of the accused,

 ACLogistics <small>An Ayala Company</small>	Document Title	Whistleblower Policy			
	Organizational Unit	AC Logistics Group of Companies			
Document No.	ACL-WBP	Restriction	Confidential	Page 3 of 4	
Last Revision Date	31 July 2023 (AHI) 9 August 2023 (ACL)	Effective Date	1 January 2025	Version	01

employees, and the Group must be protected.

The Committee is responsible for evaluating and verifying initial accusations in cooperation with relevant departments and business areas. During the initial investigation, the Internal Audit Department may review documents, emails, and other relevant information, and interview whistleblowers.

If sufficient grounds for suspicion are established, the Ethics Committee must inform the authorized person in the Company or administrative area to form an investigating unit. Exceptions include breaches of the Code of Conduct, which are reported to the Management Committee and Human Resources for administrative investigation as stipulated in the Code of Conduct.

If the estimated damage exceeds five hundred thousand pesos or harms the Group's reputation, the head of the Internal Audit Department must inform the Group's President and CEO and Audit and Risk Committee immediately.

9.0 Disciplinary and Legal Actions

The Group will consider disciplinary actions based on work and employment regulations. Disciplinary actions may include verbal or written warnings, work suspension, or dismissal. The Group may also pursue disciplinary actions against superior officers or employees found negligent in their duties and responsibilities.

Disciplinary decisions are to be made by the authorized individuals as stipulated by this policy and the code of conduct.

The Ethics Committee shall consult with the Legal and Human Resources Departments to ensure that recommended disciplinary actions align with applicable labor laws and company policies.

10.0 False/Malicious Reports

Should the Committee determine that a Whistleblower knowingly submitted a Report with false allegations or fabricated evidence for ulterior motives or personal gain, the Whistleblower will be subject to disciplinary and/or legal action accordance to Group policies and applicable laws.


11.0 Anonymous Reports

Concerns reported anonymously will be investigated appropriately subject to the gravity and credibility of the concern raised and the probability of validating the concern from reliable sources.

While anonymous reporting is accepted, whistleblowers are encouraged to provide a secure contact method (e.g., email or phone number) to facilitate updates on the investigation without compromising their anonymity. This helps the CGO and/or Internal Audit gather necessary facts to assess the nature and merit of the violation or offense.

12.0 Due Process

Personnel who are the subject of a whistleblowing report will be afforded due process in accordance with applicable laws and company policies.

 ACLogistics <small>An Ayala Company</small>	Document Title	Whistleblower Policy			
	Organizational Unit	AC Logistics Group of Companies			
Document No.	ACL-WBP	Restriction	Confidential	Page 4 of 4	
Last Revision Date	31 July 2023 (AHI) 9 August 2023 (ACL)	Effective Date	1 January 2025	Version	01

13.0 Record Retention

Records of all reported misconduct, malpractice, and irregularities shall be maintained by the relevant parties in the Group. If an investigation is initiated, the Internal Audit Department, in coordination with the Group's Legal Department, shall oversee the retention and security of records to ensure compliance with this policy and relevant legislation. A periodic audit of retained records will be conducted to verify compliance.

14.0 Implementation and Review of Implementing Rules

The Ethics Committee is responsible for implementing, monitoring, and periodically reviewing the implementing rules of this Policy, subject to the approval of the Group President and CEO.

15.0 Dissemination of the Policy and Its Implementing Rules

HR, in coordination with Corporate Communications, is responsible for the public dissemination of this policy. Where necessary, HR will arrange training for Ethics Committee members and others involved in implementing this policy.