

AXA PHILIPPINES ABRIDGED WHISTLEBLOWER POLICY

AXA Philippines has zero tolerance on any kind of misconduct and protects any one against reprisal or recriminatory action from within the Company, including its subsidiaries and affiliates.

Objective:

The objectives of the AXA Philippines Whistleblower Policy is to:

1. Support the reporting of suspected instances of improper practices or behavior which may implicate the ethical standards or integrity of AXA and that normal investigative and/or complaint handling procedures are not considered adequate;
2. Outline the mechanisms and infrastructure in place within the AXA PH for the reporting and investigation of matters raised by a Whistleblower; and
3. Outline the measures in place to protect employees against reprisal or recriminatory action from within the organization.

Who are covered by the Policy?

The Whistleblower Policy applies to ALL employees, including its subsidiaries or associated companies.

What are types of misconduct that may be reported?

1. *Human Resource Matters* – harassment, discrimination, inadequate behavior at work, breach of labor law.
2. *Misappropriation of Assets* – theft, misuse/abuse of Company assets, data leakage.
3. *Financial Statement Fraud* – misrepresentation, falsification, concealment, misstatement or omission of financial records.
4. *Corruption, Bribery, Extortion* – gift, commission, political contribution, conflict of interest.
5. *Breach of Laws* – money laundering & financing terrorism.
6. *Other acts* – endangering health, life & safety of other employees, customer mistreatment or unprofessional conduct.

How to report the misconduct?

Email report to whistleblower@axa.com.ph.

ALL REPORTS WILL BE TREATED WITH HIGHEST DEGREE OF CONFIDENTIALITY. CONFIDENTIALITY MUST BE ENSURED AT ALL TIMES AND EVERY REASONABLE EFFORT MUST BE UNDERTAKEN TO KEEP THE WHISTLEBLOWER'S IDENTITY CONFIDENTIAL. THIS IS CRITICAL IN ENSURING THAT NO REPRISAL OR RECRIMINATORY ACTION IS TAKEN AGAINST THE WHISTLEBLOWER. REVEALING THE EXISTENCE OF AN INVESTIGATION OR DETAILS CONTRARY TO THIS POLICY MAY RESULT TO A DISCIPLINARY ACTION.

REPORTS SHOULD ALWAYS BE MADE IN GOOD FAITH.