Bank of the Philippine Islands 2023 ASEAN Corporate Governance Scorecard Questionnaire

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2018C.	Role of Stakeholders	Guiding Reference	Yes/No	Supporting Documents	
C.1	The rights of stakeholders that are established by law or through mutual agreements are to be respected.				
	Does the company disclose a policy and practices that address:				
C.1.1	Stipulates the existence and scope of the company's efforts to address customers' welfare?	OECD Principle IV (A): The rights of stakeholders that are established by law or through mutual agreements are to be respected. In all OECD countries, the rights of stakeholders are established by law (e.g. labour, business, commercial and insolvency laws) or by contractual relations. Even in areas where	Yes	ENVIRONMENTAL, SOCIAL, AND GOVERNANCE MATTERS. BPI understands that ESG issues are tied directly to a company's operations or products, or indirectly through stakeholder actions across the entire value chain, and can, thus, impact company financial performance. Volatility in the global business environment due to ESG shocks - financial	
C.1.2	Explains supplier/contractor selection practice?	stakeholder interests are not legislated, many firms make additional commitments to stakeholders, and concern over corporate reputation and corporate performance often requires the recognition of broader interests.	Yes	risks, regulatory uncertainty, extreme weather, business interruption costs, and social media, among others - demand that companies build new capabilities such as preparedness for the unknown, and the ability to	
C.1.3	Describes the company's efforts to ensure that its value chain is environmentally friendly or is consistent with promoting sustainable development?	requires the recognition of broader interests. Global Reporting Initiative: Sustainability Report (C1.1 - C.15) International Accounting Standards 1: Presentation of Financial Statements	Global Reporting Initiative: Sustainability Report (C1.1 - C.15) International Accounting Standards 1: Presentation	Yes	execute a business strategy without incurring too much risk. Left unmanaged, such ESG shocks can result in critical harm to any company's management, culture, and financial well-being. Links/Sources: 2022 INTEGRATED ANNUAL REPORT ESG Matters, pp. 36-37, 139-148
C.1.4	Elaborates the company's efforts to interact with the communities in which they operate?		Yes	Customers' welfare Customer Experience, Data Privacy; Financial Product Governance> Financial Consumer Protection Program, pp. 36,44-101, 57, 58-74, 95-96, 100-101, 136-137	
C.1.5	Describe the company's anti-corruption programmes and procedures?		Yes	Supplier/Contractor selection procedures Supply Chain Management, pp. 43, 94, 135 Environmentally-friendly value chain Environmental Sustainability, pp. 79-101	
C.1.6	Describes how creditors' rights are safeguarded?		Yes	Community Interaction Financial Inclusion & Capacity Building, pp.6-7, 11-13, 44-101, 15-17 Anti-Bribery and Anti-Corruption Policy Anti-Bribery and Anti-Corruption Policy> Code of Business Conduct and Ethics, pp.130-133 Creditors	

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C.1.7	Does the company have a separate report/section that discusses its efforts on environment/economy and social issues?	OECD Principle V (A): Disclosure should include, but not be limited to, material information on: (7) Issues regarding employees and other stakeholders. Companies are encouraged to provide information on key issues relevant to employees and other stakeholders that may materially affect the long term sustainability of the company.	Yes	Global Markets, page 136 https://www.bpi.com.ph/about-bpi/investor-relations/integrated-reports • BPI WEBSITE https://www.bpi.com.ph/about-bpi/sustainability/resource-efficiency https://www.bpi.com.ph/about-bpi/governance/financial-consumer-protection https://www.bpi.com.ph/about-bpi/governance/stakeholder/communities https://www.bpi.com.ph/about-bpi/governance/conflict-of-interest-and-other-policies/anti-bribery-anti-corruption-policy Links/Sources: • 2022 INTEGRATED ANNUAL REPORT ESG Matters, pp. 36-37, 139-148 https://www.bpi.com.ph/about-bpi/investor-relations/integrated-reports • BPI WEBSITE https://www.bpifoundation.org/ https://www.bpi.com.ph/about-bpi/sustainability/environment-risk-assessment
C.2	Where stakeholder interests are protected by law, stakeholders should have the opportunity to obtain effective redress for violation of their rights.			
C.2.1	Does the company provide contact details via the company's website or Annual Report which stakeholders (e.g. customers, suppliers,	OECD Principle IV (B): Where stakeholder interests are protected by law, stakeholders should have the opportunity to obtain effective redress for violation of their rights. The governance framework and processes should be transparent and not impede the ability of stakeholders to	Yes	For any issues and concerns, the Bank discloses on its website and annual reports, its regular customer service and venues for stakeholders to communicate directly with the Bank. For customer inquiries, comments or feedback, the Bank provides its (632) 889-10000 hotline as well as toll-free numbers providing local and international access

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general public etc.) can	cate and to obtain redress for the violation	https://www.bpi.com.ph/about-bpi/contact-us
use to voice their of rights.		
concerns and/or		For specific concerns of stakeholders, i.e., suppliers, investors, etc. there are
complaints for possible		assigned contact persons as disclosed on the company website and on its
violation of their rights?		annual report.
		Apart from providing online, telephone and mobile, email, social media, etc.
		touch points for any concerns, the Bank also has a Whistleblower Policy for
		reporting of violations or suspected violations or similar concerns. These
		contact details are all provided on the company website as well as through
		its Annual Report. Below are the disclosures of such contact details on the
		website and Annual Report:
		website and Annual Report.
		Corporate Information: (As of Dec.31, 2022)
		BANK OF THE PHILIPPINE ISLANDS
		Ayala North Exchange, Tower One
		6796 Ayala Avenue corner Salcedo St.,
		Legaspi Village, Makati City 1229
		(632) 889 10000
		https://www.bpi.com.ph/about-bpi/contact-us
		https://www.bpi.com.ph/
		necessity www.spinosimpity
		BPI Stock Transfer Office
		3/F BPI Buendia Center,
		372 Senator Gil Puyat Avenue,
		Makati City
		stocktransferoffice@bpi.com.ph
		BPI Investor Relations Office
		14/F Tower One, Ayala North Exchange
		6796 Ayala Avenue corner Salcedo St.,
		Legaspi Village, Makati City 1229
		(632) 8246 5860
		investorrelations@bpi.com.ph
		Office of the Corporate Secretary
		14/F Tower One, Ayala North Exchange
		6796 Ayala Avenue corner Salcedo St.,
		Legaspi Village, Makati City 1229

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	BPI Sustainability Office
	14/F Tower One Ayala North Exchange
	6796 Ayala Avenue corner Salcedo St.,
	Legaspi Village, Makati City 1229
	sustainability@bpi.com.ph
	Customer Inquiries
	(632) 889 10000
	https://www.bpi.com.ph/about-bpi/contact-us
	Supplier, Creditor Inquiries
	(632) 889 10000
	https://www.bpi.com.ph/about-bpi/contact-us
	BPI Corporate Affairs
	16/F Tower One, Ayala North Exchange
	6796 Ayala Avenue cor. Salcedo St.,
	Legaspi Village, Makati City 1229
	corporateaffairs@bpi.com.ph
	Careers
	(632) 8548-8946
	talent@bpi.com.ph
	Whistleblower Reports
	eye report@bpi.com.ph
	The Company provides venues and contact details for stakeholders to
	communicate their concerns, disclosed in the reports below, together with
	other relevant information.
	Links/Sources:
	MANUAL OF CORPORATE GOVERNANCE
	Code of Business Conduct and Ethics> Whistleblower Policy, Sec. III. A
	E., pp. 78-79
	Stockholders' Rights and Protection of Minority Stockholder Interests,
	Sec. VII., AB., pp. 98-100
	https://www.bpi.com.ph/about-bpi/governance/conflict-of-interest-
	and-other-policies/raising-integrity-concerns/manual-corporate-
	<u>governance</u>

As of July 2023 Page 5 of 15 BPI WEBSITE Contact Us https://www.bpi.com.ph/about-bpi/contact-us Governance > Conflict of interest and other policies > Insider Trading Policy, etc. https://www.bpi.com.ph/about-bpi/governance/conflict-of-interestand-other-policies/insider-trading Governance>Board and governance> Code of business conduct and ethics https://www.bpi.com.ph/about-bpi/governance/board-andgovernance/business-conduct-ethics Who We Are https://www.bpi.com.ph/about-bpi/overview/who-we-are 2022 INTEGRATED ANNUAL REPORT Corporate Information, page 334 https://www.bpi.com.ph/about-bpi/investor-relations/integratedreports **C.3** Performance-enhancing mechanisms for employee participation should be permitted to develop. Does the company **OECD Principle IV (C):** C.3.1 Yes For its Employees: Performance-enhancing mechanisms for employee explicitly disclose the participation should be permitted to develop. In the context BPI discloses on its website, its Annual Corporate Governance Report and health, safety, and of corporate governance, performance enhancing on various annual reports which are likewise posted on the company welfare policies and mechanisms for participation may benefit companies website and/or on PSE EDGE the Bank's health, safety and welfare policies directly as well as indirectly through the readiness by practices for its employees to invest in firm specific skills. for its employees. Relevant information on all health, safety and welfare employees? programs of the Bank are likewise regularly issued on company bulletins or C.3.2 Does the company Yes Firm specific skills are those skills/competencies that are broadcast through electronic mail to employees and made available on the explicitly disclose policies related to production technology and/or organizational company intranet database. These are as follows: aspects that are unique to a firm. and practices on training and development

Examples of mechanisms for employee participation BPI strives to be an employer of choice by providing a safe, secure and programs for its include: employee representation on boards; and conducive working environment for its employees. It continually safeguards employees? governance processes such as works councils that consider their rights and provides equal opportunity for people to realize their fullest employee viewpoints in certain key decisions. With respect C.3.3Does the company have a Yes potential and make them agents of change for their communities. This drive to performance enhancing mechanisms, employee stock reward/compensation ownership plans or other profit sharing mechanisms are to to be recognized as an employer of choice leads us to implement best policy that accounts for be found in many countries. workplace practices and continue to engage our employees so that they in the performance of the turn give our customers a more positive experience. company beyond shortterm financial measures?

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	Welfare
	Recognizing that its employees are core to the Bank's success, BPI ensures the welfare and safety of its employees through competitive compensation packages as well as safe, secure, and non-discriminative working environments.
	To remain the employer of choice among Philippine banks, BPI offers competitive compensation packages benchmarked within industry standards.
	Additionally, BPI has a flexible benefits program where employees can upgrade the coverage of their existing benefits or avail additional benefits such as gym memberships.
	Bank employees undergo regular performance evaluations based on their individual accomplishments vis-a-vis their responsibilities, as well as that of the business unit or the Bank. This takes into consideration our earnings performance, asset quality, business volume, customer satisfaction, and corporate governance, among other things. From 2015 onwards, career planning and progression has also been made faster – employees may now be promoted regardless of time in rank. Employees who have been at the same level for at least five years will be regularly evaluated for promotion. Promotion criteria have likewise been revised such that previous automatic disqualifiers (for example, tardiness) are now given due consideration in the promotion evaluation.
	Regular employees are also provided with a comprehensive pay and benefits package, which includes a quarterly bonus (inclusive of the required 13th month pay), overtime pay, and leave credits (vacation, sick, emergency, and maternity/paternity). Our compensation package is reviewed regularly.
	In 2015, the job levels of our information systems group were restructured and rationalized to compete more effectively with the compensation structure of the IT industry. Some non-cash benefits to the IT professionals were also monetized in line with industry practice.

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by offering our employees and their families our products and services at affordable terms. These include low-interest rates for auto and housing loans, emergency loans, medical and group term insurance, salary and emergency loans. In addition, we provide financial security to employees even after their retirement from the Bank through our retirement benefit plan. The plan defines an amount that employees will receive which is dependent on the employee's age, years of service and compensation.

The Bank also continues to strictly comply with labor laws and regulations and implement best practices in our workplace. The Bank recognizes the existence of company union(s) and the rights to freedom of association and collective bargaining. The Bank does not discriminate on gender, religion, age, race, color, political stand or social background. It strictly enforces nonemployment of minors and is against forced compulsory labor.

We maintain harmonious relations with our labor unions. The Bank also has an open-door communications policy to address concerns among

As a requirement in their certification process, the Bank also trains and retrains security personnel, who are not formally part of our workforce and belong to third-party agencies, every two years on human rights-related topics. This is to ensure that they uphold the rights not only of our employees but also of our clients, suppliers and other stakeholders that do

The Bank also has various interest clubs to allow employees to pursue their passions and explore talents outside of work while building camaraderie

The Bank also looks after its retiring employees through the conduct of annual seminars on estate planning, investment opportunities in the Bank and outside, and transition from being an employee to an entrepreneur. There are also counseling programs that help employees face life during retirement. The Bank's off-boarding program has also been strengthened to further equip BPI retirees as they transition to the next chapter of their lives - among other improvements, processing of documents has been made more convenient and employees who are suffering from ailments

Page 8 of 15 may now advance a portion of their retirement funds to help defray medical

expenses.

Health

The Bank believes it must create an environment where its employees have opportunities for development in tandem of their mind and body. Hence, the Bank provides a comprehensive medical program which provides for inpatient and out-patient benefits for employees and dependents. Yearround, there also are sports, recreational, health and wellness programs and physical activities, i.e., running, bowling, basketball, badminton, aerobics and dancing, etc., for all employees.

We run education and training programs regarding serious illnesses. Examples of programs implemented are seminars on cancer awareness, prevention of stroke, and basic life support. Aside from health education, we also have risk-control programs in place to assist workforce members and their families regarding serious diseases. This was done through wellness fairs conducted in the head offices and provincial business centers where employees and their families avail of free or discounted services such as vaccinations, bone screening and physical examinations.

In 2022 **Annual Physical** In partnership with the Bank's Health Maintenance Organization (HMO) provider, APEs were held at the BPI Examinations (APE) offices and satellite locations to fit in the busy schedule of the employees and ensure their safety. Webinars 13 webinars aired via the official BPI Facebook Group exclusively for employees, #BePartoflt, covering a wide range of health topics, from the COVID-19 Omicron virus, mental health, laughter therapy, obesity, stroke, hormonal acne, and diabetes which were delivered by engaging physicians well-known in their fields of expertise. Active Lifestyle Online and face-to-face Zumba sessions after office hours at the BPI Buendia Center. Work-Life Balance BPI acknowledges and respects the different facets of employees' lives and promotes a work environment that aims to bring fulfillment in each employee's professional and personal lives Non-Discrimination BPI fosters a work environment that encourages respect, equal opportunity and non-discrimination

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		based on gender, religion, age, race, ethnicity, skin or color, disability, political views or social background.
	Grievance Mechanism	Promptly addresses and amicably settles grievances, if any. More information on this can be found in the BPI Code of Business Conduct and Ethics on the BPI website.
	Safety	
	offices and branches, employees. In 2022, being of employees. initiatives that ensure	afe and secure working environment in its corporate ascertaining the physical and mental well-being of its the BPI BeWell program targeted the holistic well-The HR Safety and Disaster team leads the Bank's the occupational health and safety in our work sites.
	In 2022 Natural and Man- Made Hazards	Regular work safety briefings and capacity building through training and drills, awareness campaigns, and monthly branch visits. Preparations before impact of natural disasters such as strong typhoons through weather bulletins and published emergency contact details in case needed, providing assistance up to recovery period. Regular assessment and upkeep of facility to prevent workplace accidents and damage to property.
	Transportation Services	Provision of highly subsidized shuttle services for 26 routes from Metro Manila and nearby provinces such as Laguna, Bulacan and Rizal to its Makati and Intramuros work sites, servicing over 3,000 unique employees since it was offered in March 2020.
	Security Protocols	Robust protocols and safeguards on potential terrorist attacks in branches and corporate offices • Mandatory training on physical security
	Employee Welfare, H	ealth, and Safety.
	in-class customer exp trusted partner and fi choice among Philippi	competent employees is BPI's goal for delivering best- eriences and for achieving its vision of being the most nancial advisor. The Bank strives to be an employer of ine financial institutions. With strengths in three main nt drivers of career development and opportunities,

goal clarity, and leadership, the Bank introduced more initiatives to boost

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]	competency	development	among	its officers	and	staff,	worked	to
			accelerate p	romotions, and	d identifie	ed the righ	t metri	cs to	better a	lign

accelerate promotions, and identified the right metrics to better align human resource measures with corporate strategy. Moreover, BPI strives to provide a safe, secure, and conducive working environment for its employees, to continually safeguard their rights and provide equal opportunity for everyone. (Recommendation 2.9 of the SEC CG Code for PLCs)

Employee Training and Development

Every year in January is the schedule for annual performance appraisals based on pre-determined key result areas (KRAs) linked to each team's respective business objectives. This facilitated performance feedback conversations with the aim of developing a unique and enriched development plan for the employee being assessed.

The Individual Development Plan (IDP) documents the employee's intentions and support needed to meet his/her growth goals. It complements the annual performance appraisal as it encourages employees to invest in their work and growth, contributing to greater job satisfaction.(Recommendation 15.1 of the SEC CG Code for PLCs)

In June 2022, the BPI University Hub was launched as an online one-stop shop for all employees' training and development needs. It features several types of training material covering leadership skills, functional skills, as well as new skills aligned with emerging global trends such as data analytics and digital transformation. The courses are made available through internal resources and online platforms. Employees underwent a total of 973,446 training hours in 2022. Training platforms included: Granite, Percipio, Degreed and Coursera.

Leadership Academy	Functional Academy	Future Tech Academy	
Provides opportunities	Develops and	Provides employees	
for leaders to lead,	strengthens specific	with skills and	
inspire, and motivate	functional and technical	capabilities needed to	
their team members	competencies that allow	future-proof	
and the rest of the	employees to perform	the organization	
organization	their tasks effectively		
Build Organizational	 Accounting 	Agile Methodology	
Talent	 Admin Services 	BPI F.L.A.G.S. Program	
 Coaching for Success 	Branch	(Data	
Customer Focus	Operations	Fundamentals, Lifecycle	

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Pirve Strategy Execution I.ead Change I.ead Self I.ead Teams Management 101 Officer Training Program Pro						
Management			 Execution Lead Change Lead Self Lead Teams Management 101 Officer Training 		Marketing, and Communications Business Intelligence Business Support Credit Customer Excellence Facilities Management Finance Governance Human Resources Information Technology Investment Product Management Project Management Relationship Management	& Storytelling, Governance, and Standards) DaPP General Modules Data Awareness Week Design Thinking Digital Transformation OTP Data Literacy Topics OTP Innovation
				•	Relationship Management Sales Top	
			Reward/Compensation	Polic		n Financial Measures:

The Bank, in aligning management's interest with shareholders, has an equity-linked incentive plan to its all its officers, including junior officers from Assistant Manager and up (with eligibility requirements): Executive Stock Purchase Plan (ESPP). A major initiative of the Bank under its longterm incentive program, the Executive Stock Purchase Plan (ESPP) was launched in 2013. The ESPP gives the officers the opportunity to buy shares of stock in BPI, at a discounted price based on the volume weighted average of BPI's share price for the past 30 days. Management believes that this stronger alignment between the interests of BPI officers and interests of shareholders will benefit all stakeholders, i.e., more robust earnings and a healthier balance sheet will be reflected in a stronger and higher stock valuation. (Source: Human Resources Management Group)

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	The Company discloses activities, data and information with respect to its
	activities on recognition and protection of the rights of its employees in the
	reports below, together with other relevant information.
	Links/Sources:
	BPI WEBSITE
	Governance> Role of Stakeholders
	https://www.bpi.com.ph/about-bpi/governance/financial-consumer-
	protection/clients
	https://www.bpi.com.ph/about-
	bpi/governance/stakeholder/employees
	https://www.bpi.com.ph/about-bpi/governance/stakeholder/suppliers
	https://www.bpi.com.ph/about-
	bpi/governance/stakeholder/stockholders
	https://www.bpi.com.ph/about-bpi/governance/stakeholder/minority-
	stockholders
	https://www.bpi.com.ph/about-bpi/governance/stakeholder/investors
	https://www.bpi.com.ph/about-bpi/governance/stakeholder/creditors
	https://www.bpi.com.ph/about-
	bpi/governance/stakeholder/communities
	https://www.bpi.com.ph/about-
	bpi/governance/stakeholder/environment-friendly-value-chain
	bpi/governance/stakenoider/environment-mendiy-valde-chain
	Commence Code of Durings Conduct and Ethio
	Governance> Code of Business Conduct and Ethics
	https://www.bpi.com.ph/about-bpi/governance/board-and- governance/business-conduct-ethics
	governance/business-conduct-etnics
	Sustainability
	https://www.bpi.com.ph/about-bpi/sustainability
	2022 INTEGRATED ANNUAL REPORT
	Employee Health, Safety and Welfare, pp. 86-93
	https://www.bpi.com.ph/about-bpi/investor-relations/integrated-
	reports
	• SEC Form 17-A (for the year ended December 31, 2022)
	Employee Health, Safety and Welfare, page 70
	https://www.bpi.com.ph/about-bpi/investor-relations/disclosures/sec-
	filings
C.4 Stakeholders including	
individual employee and	
their representative	

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C.4.1	bodies, should be able to freely communicate their concerns about illegal or unethical practices to the board and their rights should not be compromised for doing this. Does the company have a	G20/OECD Principle IV (E):	Yes	The Dealt established and supports a Missels below 200 feet and 200 fe
C.4.2	Does the company have a whistle blowing policy which includes procedures for complaints by employees and other stakeholders concerning alleged illegal and unethical behaviour and provide contact details via the company's website or annual report Does the company have a policy or procedures to protect an employee/person who reveals illegal/unethical behaviour from retaliation?	G20/OECD Principle IV (E): Unethical and illegal practices by corporate officers may not only violate the rights of stakeholders but also be to the detriment of the company and its shareholders in terms of reputation effects and an increasing risk of future financial liabilities. It is therefore to the advantage of the company and its shareholders to establish procedures and safeharbours for complaints by employees, either personally or through their representative bodies, and others outside the company, concerning illegal and unethical behaviour.	Yes	The Bank established and supports a Whistleblower Policy and program, an important mechanism for preventing and detecting fraud or misconduct, and enabling fast and coordinated incident responses as we establish cause, remedial actions, and damage control procedures. The Bank remains committed to integrity and ethical behavior by helping to foster and maintain an environment where all personnel can act appropriately without fear of reprisal and be treated with utmost confidentiality. A separate and distinct reporting and investigation process beyond the normal reporting lines are in place. Any violation of the bank's policies and procedures may be reported in writing, in person or through a dedicated and confidential BPI e-mail that has been established for this purpose. The Policy covers all employees of the BPI group and all wrongful acts that adversely impact the Bank and its stakeholders. Under the Policy, it is the responsibility of all personnel to comply with the rules and regulations of the BPI group and to report violations or suspected violations in accordance with the Whistleblower Policy. Anybody who knowingly aids, abets, or conceals or otherwise deliberately permits the commission of any irregular or fraudulent act directed against the BPI group shall be considered as guilty as the principal perpetrators of the fraud or irregularity. Hence, all employees of the BPI Group have a duty to cooperate with investigations initiated under the policy. The policy also presumes that the employees of the BPI group act in good faith and will not make any false accusations when reporting the wrongdoing done by another employee. An employee who knowingly or recklessly makes statements or disclosures that are not in good faith shall be subject to disciplinary action/s, which may include termination. (1) Employees can report any violation of policies, procedures and applicable laws and regulations which include, but are not limited to,
				the following: Fraud, Sexual Harassment, Theft, Stealing, Conflict of Interest Information Security Violation, Violation of Bank Policies,

As of July 2023 Page 14 of 15 Rules and Regulations and any other acts which are inimical to the interests of the BPI group. (2) The whistleblower may approach any of the following Officers who shall be the designated contacts for the Bank and the primary reporting line: a. Head of Human Resources Management Group (HRMG) or b. Chief Internal Auditor or c. Chief Risk Officer Under extraordinary circumstances, the whistleblower can also course the complaint through other reporting lines (President or Chairman of the Bank's Audit Committee). (3) Upon receipt of the whistleblowing report, the Personnel to whom the report was disclosed shall then immediately initiate the investigation upon receipt of the report by turning over the details, documents, if any, of the reported case to the Investigating Unit of the Bank. (4) The investigation of the whistleblowing report shall follow the due process as stipulated in the standards in handling fraud and irregularities. Under the Whistleblower Policy, there are provisions on non-retaliation: (1) An individual who makes a "protected disclosure" shall not suffer harassment, retaliation, or adverse employment consequences. Any person who retaliates against any individual who makes a protected disclosure shall be subject to discipline up to an including termination. (2) The right of a whistleblower for protection against retaliation does not include immunity for his/her wrongdoing or participation in the reported irregularity and such participation was eventually verified and proven during the course of the investigation. (3) In case the whistleblower believes he has been retaliated against for whistleblowing, he may seek redress or file a formal complaint to the HRD Group Head, Chief Internal Auditor, or the Chief Risk Officer. The Bank's Code of Conduct also encourages employees to report any unethical behavior or activities, following the Whistleblower Policy. (Source: Human Resources Management Group, Code of Business Conduct and Ethics, Personnel Policy Manual, Manual of Corporate Governance and

Company website)

Information on the Whistleblower Policy appropriate infrastructure as well as the engagement with its employees and all other communicate their concerns or complaints disclosed in the reports below, together with the Whistleblower Policy and procedures, disclosed in the Annual Report as well as the Links/Sources: MANUAL OF CORPORATE GOVERNANCE	Page 15 of 15
	the Bank's stance of active ther stakeholders to allow them to nts without fear of retaliation, as with other relevant information. es, including contact details, are
Code of Business Conduct and Ethics> Wh pp. 78-89; Stockholders' Rights and Prot Interests, Sec. VII., AB., pp. 98-100 https://www.bpi.com.ph/about-bpi/gove and-other-policies/raising-integrity-conce governance BPI WEBSITE Contact Us https://www.bpi.com.ph/about-bpi/cont Governance> Conflict of Interest and o Concerns-Whistleblower Policy https://www.bpi.com.ph/about-bpi/gove and-other-policies/raising-integrity-conce Who We Are https://www.bpi.com.ph/about-bpi/over Governance, Role of Stakeholders https://www.bpi.com.ph/about- bpi/governance/stakeholder/stockholder https://www.bpi.com.ph/about- bpi/governance/stakeholder/stockholder	Whistleblower Policy, Sec. III. AF., rotection of Minority Stockholder overnance/conflict-of-interest-incerns/manual-corporate- ontact-us other policies> Raising Integrity overnance/conflict-of-interest-incerns everyiew/who-we-are