

	POLICY	Governance & Corporate Affairs	Policy No. GOV 2017–007	
			Reference: Annual Corporate Governance Report	
	ACCOUNTABILITY, INTEGRITY AND VIGILANCE (WHISTLE-BLOWING)		Effective Date as approved by BOD on 07.29.2013	Amended on 01.01.2017 Ver.1, Rev. 1

1. Objectives

- 1.1. To encourage everyone to participate and work towards creating an environment where concerns can be freely raised for possible violations of our Code of Business Conduct and Ethics, policies and laws without fear of retaliation.
- 1.2. To provide guidelines on reporting violations or potential violations of policies.

2. Scope / Coverage

- 2.1. This policy covers all Directors, Officers and Employees, as well as:
- 2.2. Consultants, suppliers who act on behalf of Belle collectively, hereinafter referred to as “Employees”

3. Definition of Terms

- 3.1. Accountability – The obligation of an individual or organization to account for its activities, accept responsibility for them, and to disclose the results in a transparent manner. It also includes the responsibility for money and other entrusted property. (Ref. www.businessdictionary.com)
- 3.2. Integrity – Strict adherence to a moral code, reflected in transparent honesty and complete harmony in what one thinks, says and does. (Ref. www.businessdictionary.com)
- 3.3. Vigilance – Alert watchfulness (Ref. www.thefreedictionary.com)

4. Policy

Consistent with Belle Corporation’s commitment to professional ethics and traditional values, the Company expects its directors, officers, employees, consultants, suppliers who act on behalf of Belle, hereinafter referred to as the “Employees” to observe high standards of business and personal ethics in the conduct of their duties and responsibilities at all times inside and outside the Company.

Everyone is expected to participate and work towards creating an environment where concerns can be freely raised for possible violations of our Code of Business Conduct and Ethics, policies and laws so they can be resolved sooner than later.

5. Guidelines

- 5.1. **Reporting Mandate** – It is the responsibility of all Employees to comply with and to report violations or suspected violations of the Code of Business Conduct and Ethics, policies, or laws in accordance with this policy.
- 5.2. **Reporting in Good Faith** – All Employees are encouraged to report violations or potential violations of this policy. Anyone filing a complaint concerning this must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code, policies, or law. Any allegations that prove not to be substantiated and have been made maliciously or with knowledge that they were false will be treated as a serious disciplinary offense. Any good faith report, concern or complaint is fully protected by this policy, even if the report, question or concern is, after investigation, not substantiated.

 BELLE CORPORATION	POLICY	Governance & Corporate Affairs	Ref. Policy No. GOV 2017-004	
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5.2.1. Reporting may be done in writing or verbally and anonymously through the Employee’s Manager, or the Human Resources, or the Governance and Corporate Affairs, Departments.

5.3. No Retaliation – Anyone who in good faith reports a violation of the Code or policies, or law shall not be retaliated upon or suffer harassment or adverse employment consequence. Belle expressly disapproves of acts of retaliation, intimidation and other harmful actions.

5.4. The Escalation Process – Violations or suspected violations of Company policies can be escalated to any of the following members of the Ethics Committee:

- The Head of Human Resources
- The Head of Governance & Corporate Affairs
- The Head of Internal Audit

5.4.1. Above member shall acknowledge receipt of complaints in writing within 24 hours from receipt of the same.

5.5. Confidentiality – Upon the request of the complainant, the Company will use its best efforts to protect the confidentiality of the complainant for any good faith report. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate and immediate investigation.

5.6. Handling of Reported Violations – The Company’s Code of Business Conduct and Ethics, Code of Discipline, and other relevant rules and regulations, shall serve as guide in determining the penalties and sanctions to be imposed where violations are proven and validated by the Ethics Committee.

5.6.1. The principle of due process shall be observed in the handling of all cases.

5.6.2. The Corporate Governance Committee, as it is in charge of monitoring compliance with the Code of Business Conduct & Ethics and applicable laws, etc., shall be informed of all such complaints or reports and their status to be rendered by the Ethics Committee.