

COMPANY NAME : BPI-PHILAM LIFE ASSURANCE (BPLAC) CORPORATION
 COMPANY STRUCTURE : CLASS 3
 FINANCIAL YEAR END : 2018
 SECTOR : INSURANCE

C. Role of Stakeholders

| C.1 | The rights of stakeholders that are established by law or through mutual agreements are to be respected. | Y/N | Reference/Source Document |
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| <i>Does the company disclose a policy that:</i> | | | |
| C.1.1 | Stipulates the existence and scope of the company's efforts to address customers' welfare? | Y | <p>BPI-Philam complies with the AIA Code of Conduct, which provides for the ethical guidelines for conducting business. It specifies, among others the Company's commitment to conduct the business in a manner that protects the health, safety and security of the employees, customers and other stakeholders.</p> <p>The Treating Customers Fairly Policy demands that customers are treated fairly at all times and that products, services, and advice are appropriate to meet customer needs.</p> <p>BPLAC also recognizes its responsibilities in protecting personal data and sensitive information of all its stakeholders, including its customers. The Board of Directors, Management and Staff of BPI-Philam commit themselves to adopt and adhere to the Policy guidelines to ensure protection of personal information and sensitive data collected by and shared with the Company.</p> <p>Source Document:</p> <ul style="list-style-type: none"> ▪ 2018 Annual Report, pages 59 to 60, Treating Customers Fairly ▪ 2018 Annual Report, page 60. Data Privacy |
| C.1.2 | Explains supplier/contractor selection practice? | Y | <p>BPI-Philam has a policy on supplier/contractor selection practice that is extensively covered by its Supplier Manual.</p> <p>BPI-Philam also complies with the AIA Code of Conduct, which provides that the Company select suppliers and vendors on the basis of performance and merit in accordance with a fair and transparent process. Appropriate due diligence is performed regarding potential agents, consultants and independent contractors prior to engaging their services.</p> <p>Like AIA, BPI-Philam seeks supplier partnerships with diverse businesses and values suppliers that share the Company's dedication and commitment to diversity and social responsibility.</p> <p>Source Document:</p> <p>2018 Annual Report, page 62, SUPPLIER SELECTION</p> |
| C.1.3 | Describes the company's efforts to ensure that its value chain is | Y | BPLAC adheres to the AIA Code of Conduct, which provides a Policy on |

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| | <p>environmentally friendly or is consistent with promoting sustainable development?</p> | | <p>Social and Environment Responsibilities, where the Company is committed to contribute positively to the social and economic development of the communities in which it operates, and reduce the impact of its operations on the environment and raising awareness about sustainability by taking part in activities that highlight these issues.</p> <p>BPLAC adheres to AIA's Policy that Ensures Environment-Friendly Value Chain. For 100 years, AIA has provided protection to individuals and families when they have needed it most. As a market leader, AIA focuses on the sustainability of our financial results, but it also focuses on helping to address the challenges faced by the markets. We believe that this focus on sustainability is integral to our long-term growth and the sustainable and inclusive development of our communities.</p> <p>BPLAC also acknowledges the direct impact of the environment on the health and well-being of its customers, our employees and the communities, the reason it values and strives to influence positive environmental practices within the country.</p> <p>AIA has released its ESG Report 2018, which sets out in detail the ESG priorities and the commitments it is making toward its promise of enabling Healthier, Longer, Better Lives across the Asia Pacific region. The report is a milestone in AIA's journey to further improve and report on our environmental, social and governance performance and impact. The ESG Report has been structured to demonstrate how we manage our impact and address priority sustainability issues. The Report includes, unless otherwise indicated, ESG data from operations in the Philippines, Hong Kong, Thailand, Singapore, Malaysia, China, Korea, and Australia, among others.</p> <p>Source Document:</p> <ul style="list-style-type: none"> ▪ AIA Code of Conduct, page 24. Social and Environment Responsibilities. ▪ AIA Website, ESG Report 2018 (http://www.aia.com/en/about-aia/esg.html) |
| C.1.4 | Elaborates the company's efforts to interact with the communities in which they operate? | Y | BPI-Philam fully support Philam Foundation by allocating a portion of its income annually for Corporate Social Responsibility (CSR). The annual donation to Philam Foundation helps |

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| | | | <p>fund programs that focus on education, health and financial well-being – Philam Paaralan, Philam Savings and Awareness and Values Education Sessions (SAVES), and Alliance for the Philippines’ Health and Advocacy (ALPHA Initiative).</p> <p>Source Document: 2018 Annual Report, page 28 - CORPORATE SOCIAL RESPONSIBILITY</p> |
| C.1.5 | Describe the company's anti-corruption programmes and procedures? | | <p>Y</p> <p>BPI-Philam adheres to the Company's Anti-Corruption & Bribery Policy, which is applied alongside the AIA Code of Conduct.</p> <p>The Anti-Corruption & Bribery Policy provides guidance on giving and accepting gifts and entertainment. The Anti-Corruption Guidelines specifies the roles, responsibilities and procedural controls for transactions involving government officials. All relevant laws countering bribery and corruption is upheld. If local laws and regulations require higher compliance standards vis-a-vis the guidelines of the AIA Code of Conduct, then BPI-Philam is required to meet the higher standards.</p> <p>The Anti-Corruption & Bribery Policy basically prohibits all employees, agent, or independent contractor in providing bribes or other benefits to another person in order to obtain or retain business or unfair advantage in any business interaction involving AIA and BPI-Philam, its customers and employees.</p> <p>Source Document: 2018 Annual Report, page 63, Anti-Corruption and Bribery & Gifts and Entertainment</p> |
| C.1.6 | Describes how creditors' rights are safeguarded? | | <p>Y</p> <p>BPI-Philam adheres to its Fair Dealing Policy, which ensures that businesses with the customers, service providers, supplier and competitors are conducted in a fair manner.</p> <p>Following AIA’s model, BPI-Philam seeks competitive advantages only through legal and ethical business practices. Every employee must conduct business in a fair manner with customers, service providers, suppliers and competitors. Disparaging competitors or their products and services is discouraged. Improperly taking advantage of anyone through manipulation, concealment, abuse of privileged information, intentional misrepresentation of facts or any other unfair practice is not and will not be tolerated at BPI-Philam much more in the AIA Group.</p> <p>It is the policy of BPI-Philam to uphold</p> |

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| | | | | <p>creditor's rights by honouring its contractual obligations with all its creditors and counterparties, in accordance with the provisions of their contracts and the law. In the conduct of its business dealings with third parties, BPI-Philam undertakes to honour all its commitments, stipulations and conditions set forth in their binding agreements.</p> <p>Source Documents:</p> <ul style="list-style-type: none"> ▪ AIA Code of Conduct, page 15 – Fair Dealing ▪ 2018 Annual Report, page 61 - Fair Dealing & Creditor's Rights |
| <i>Does the company disclose the activities that it has undertaken to implement the above mentioned policies?</i> | | | | |
| C.1.7 | Customer health and safety | OECD Principle IV (A) & Global Reporting Initiative | Y | <p>In Q1 2018, we strengthened customer loyalty through 5 major programs, namely: (1) Premium Collection Campaign which encouraged timely payment of premiums for continued insurance protection; (2) Reinstatement Campaign which provided a hassle-free opportunity for customers to reactivate their lapse or discontinued policies; (3) Anniversary Program for Preferred Segment or managed accounts; (4) Welcome and Anniversary Survey for customers who are on-the-go and prefer the digital channel; and (5) ePlan Activation Campaign to ensure utilization of the Customer Portal for policy inquiry and simple transactions.</p> <p>In the same year, we also reached a premium collection rate of 90% which is 10 basis points higher than industry standard. This result was brought by retention campaigns which influenced regular and on-time payment of premiums, as well as driving payment reminders for identified months with lowest collection activities. During these slow months, special programs were conducted to entice clients in paying premiums on time, while branch salesforce supported in re-engaging with clients for premium renewals and reinstatements.</p> <p>We also formulated a Total Weighted Premium Income (TWPI) taskforce to review premium collection systems and processes especially the electronic Auto-Debit Arrangement (eADA) facility. The taskforce reviewed the customer journey, business gaps, and address process and platform-related matters to control adverse effects of non-collection and attrition.</p> <p>We also expanded the nurturing programs to the managed accounts of BPI-Philam via the Anniversary Program. Aside from revisiting the</p> |

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| | | | <p>client to review his BPI-Philam policy, the program encouraged Preferred clients to share improvement areas in service handling and review current financial state through a financial and wellness needs analysis meeting. Clients who completed the Anniversary Program were entitled to a raffle entry for surprise tokens.</p> <p>Last year, we also rolled out the Customer Journey Mapping programs together with our BPI partners and Philam Life Stakeholders through the guidance of our AIA Group Customer Experience representatives. During this 2-day event, the participants were guided to an introduction of Design Thinking or Human-Centered Design and the AIA prescribed mapping of a customer's journey from brand discovery to onboarding and claims. As a result, the teams completed three (3) customer journey maps for defined segments of BPI-Philam: (a) Sea-based Overseas Filipino Workers; (b) Millennial and employees working in BPOs; and (c) Entrepreneurs.</p> <p>Source Document: 2018 Annual Report, page 16 – CUSTOMER EXPERIENCE</p> |
| C.1.8 | Supplier/Contractor selection and criteria | Y | <p>BPI-Philam also complies with the AIA Code of Conduct, which provides that the Company select suppliers and vendors on the basis of performance and merit in accordance with a fair and transparent process. Appropriate due diligence is performed regarding potential agents, consultants and independent contractors prior to engaging their services.</p> <p>Like AIA, BPI-Philam seeks supplier partnerships with diverse businesses and values suppliers that share the Company's dedication and commitment to diversity and social responsibility.</p> <p>Business partners serve as extensions of BPI-Philam to the extent that they operate within contractual relationships. Business partners are expected to adhere to the spirit of the AIA Code of Conduct and to any applicable contractual provisions.</p> <p>Business partners must not act in a way that is prohibited or considered improper for a BPI-Philam employee. Employees must ensure that customers, agents, and suppliers do not exploit their relationship with BPI-Philam or use BPI-Philam's name connection with any fraudulent, unethical or dishonest transaction.</p> |

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| | | | <p>Suppliers and vendors are selected on the basis of performance and merit in accordance with a fair and transparent process. Requirements for suppliers and vendors to follow the standards in the Code must be included in the vendor management programme.</p> <p>The total expenditure on goods and services from third party suppliers form a significant part of BPI-Philam’s operating cost. Any activity by a line of business to acquire goods/services must be undertaken in a professional manner to ensure BPI-Philam is able to maximize the value and manage risks associated with use of external suppliers.</p> <p>The local Sourcing Policy, which took effect in November 2013, sets out the framework within which BPI-Philam must engage external suppliers for goods/services and is supplemented by BPI-Philam’s Sourcing Practice Guide. This provides BPI-Philam the standard processes and document templates in engaging suppliers that should be read in conjunction with the policy document.</p> <p>The BPI-Philam Sourcing Policy, with the AIA Group Sourcing Policy as a model, was defined with the primary objective to establish standardized sourcing procedures.</p> <p>As set out in the AIA Group Sourcing Policy, a Local Sourcing Lead (LSL) or a designate is appointed and will be responsible for ensuring implementation, execution, update and compliance of the local policy. This person should closely work with the AIA Group Sourcing (GS) team.</p> <p>Source Document: 2018 Annual Report, pages 61 to 62 – Supplier Selection and Sourcing Policy</p> |
| C.1.9 | Environmentally-friendly value chain | Y | <p>Similar to Philam Life, BPLAC has also implemented various activities to promote an environment-friendly value chain and sustainable development.</p> <p>Source Document: Environmentally Friendly Value Chain Activities</p> |
| C.1.10 | Interaction with the communities | Y | <p>BPI-Philam beyond bancassurance continuously include corporate social responsibility initiatives. BPI Foundation and Philam Foundation built 16 new fully-furbished classrooms in 2018 under the program Philam Paaralan, which builds in calamity hit and underserved areas in the country. This project was made possible with BPI-Philam’s</p> |

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| | | | <p>commitment to allocate a portion of its income for CSR annually. This annual donation to Philam Foundation help fund programs that focus on health, education and financial well-being namely the Philam Savings Awareness and Values Education Sessions (Philam SAVES) and Alliance for the Philippines' Health and Advocacy (ALPHA Initiative).</p> <p>BPI-Philam through Philam Foundation will continue to work towards making better lives possible among our countrymen through its programs that make each Filipino "Healthy, Wealthy, and Wise". At the celebration of its 20th Founding Anniversary, the Foundation received an institutional donation in the amount of P35 Million from the Philam Group of Companies to support the Foundation in implementing its programs for health, education and financial literacy.</p> <p>To date, Philam Foundation's Philam Paaralan Program has built 133 classrooms nationwide. The Foundation also began the implementation of two more programs that address issues that matter to the Philam Group: financial literacy and health, bringing life to the three pillars, Healthy, Wealthy, and Wise.</p> <p>BPI-Philam also strengthened the backbone of the program by incorporating the Financial Literacy Sessions for adults with the assistance of our Financial Advisors. Philam Life was able to conduct eight sessions, attracting and educating more than 400 schoolchildren and 300 adults.</p> <p>Source Document: 2018 Annual Report, page 28, CORPORATE SOCIAL RESPONSIBILITY</p> |
| C.1.11 | Anti-corruption programmes and procedures | | <p>Y</p> <p>The Policy is applied alongside the AIA Code of Conduct. It provides guidance on giving and accepting gifts and entertainment. The Anti-Corruption Guidelines specifies the roles, responsibilities and procedural controls for transactions involving government officials. All relevant laws countering bribery and corruption must be upheld. If local laws and regulations require higher compliance standards vis-a-vis the guidelines of the AIA Code of Conduct, then BPI-Philam must meet the higher standards.</p> <p>The Anti-Corruption & Bribery Policy prohibits all employees, agents, or independent contractors in providing bribes or other benefits to another person in order to obtain or retain business or unfair advantage in any business interaction involving AIA and</p> |

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| | | | | <p>BPI-Philam, its customers and employees.</p> <p>The company is not allowed to use improper means to influence another person's business judgement. All employees and officers are required to report to the Compliance Officer any gift/entertainment provided to Government organizations and/or any of its officials.</p> <p>Philam Group conducts a Code of Conduct Annual Certification Program, which requires all employees to confirm and certify their knowledge of, and compliance to the AIA Code of Conduct, which includes the Policy on Anti-Corruption and Bribery Policy.</p> <p>Source Document:</p> <ul style="list-style-type: none"> ▪ 2018 Annual Report, page 63, Anti-Corruption & Bribery & Gifts and Entertainment ▪ Compliance Trainings for 2018 |
| C.1.12 | Creditors' rights | | Y | <p>It is the policy of BPI-Philam to uphold creditor's rights by honouring its contractual obligations with all its creditors and counterparties, in accordance with the provisions of their contracts and the law. In the conduct of its business dealings with third parties, BPI-Philam undertakes to honour all its commitments, stipulations and conditions set forth in their binding agreements. As of to date, BPI-Philam does not have outstanding loans from banks/credit institutions.</p> <p>In October 2018, the Company has also adopted its Guidelines on Contract Management, which aims to support the Philam Group in developing a sound, consistent and effective approach to manage its diverse range of contracts. It deliberately focuses on the activities associated with the operational phase of the contract from negotiations period up to after the contract has been awarded and is up and running. To facilitate proper implementation, the Guidelines was cascaded to our records coordinators and contract managers.</p> <p>Source Document:</p> <ul style="list-style-type: none"> ▪ 2018 Annual Report, page 61 – FAIR DEALING POLICY AND CREDITORS RIGHTS ▪ 2018 Annual Report, page 61 - RECORDS MANAGEMENT |
| C.1.13 | Does the company have a separate corporate responsibility (CR) | OECD Principle V (A): | Y | <p>Foundation by allocating a portion of its income annually for CSR. The annual donation to Philam The Annual</p> |

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| | report/section or sustainability report/section? | 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. | | Report contains the Corporate Responsibility Report of Philam Foundation, the corporate social responsibility arm of Philam Life. Source Document: 2018 Annual Report, page 28 – CORPORATE SOCIAL RESPONSIBILITY |
| 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, general public etc.) can use to voice their concerns and/or complaints for possible violation of their rights? | 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 communicate and to obtain redress for the violation of rights. | Y | BPI-Philam makes sure that all its stakeholders (i.e. customers, suppliers, general public etc.) have the avenue to voice their concerns and/or complaints. In its Contact Us section in the Company Website, BPI-Philam provides its stakeholders different channels through which stakeholders can get in touch with the Company. The contact details include an e-mail address, the head office telephone number, and each branch's address and telephone number. There is also a form, which the stakeholder can fill out. Any employee (or anyone else) may also raise concerns of misconduct or wrongdoing within AIA and BPI-Philam through multiple means provided in the AIA Code of Conduct. The report may also be made by using the AIA Group Ethics and Compliance Hotline Hotline 1010-5511-00 + 800-245-4179. Source Document: <ul style="list-style-type: none"> • 2018 Annual Report, page 82 – Contact Details • https://www.bpi-philam.com/en/help-support.html |
| C.3 | Performance-enhancing mechanisms for employee participation should be permitted to develop. | | | |
| C.3.1 | Does the company explicitly disclose the health, safety, and welfare policy for its employees? | OECD Principle IV (C): Performance-enhancing mechanisms for employee participation should be permitted to develop. In the context of corporate governance, performance enhancing mechanisms for participation may benefit companies directly as well as indirectly through the readiness by employees to invest in firm specific skills. Firm specific skills are those skills/competencies that are related to production technology and/or organizational aspects that are unique to a firm. | Y | BPI-Philam conducts its business in a manner that protects the health, safety and security of its employees and customers. The Company thus not only promotes health and well-being of its employees, but a safety and healthy workplace as well. Source Document: <ul style="list-style-type: none"> ▪ 2018 Annual Report, page 59 – CREATING A SAFE AND HEALTHY WORKPLACE ▪ 2018 Annual Report, page 26 – PROMOTING HEALTH AND WELL BEING |
| C.3.2 | Does the company publish relevant information relating to health, safety and welfare of its employees? | | Y | BPI-Philam, thru its internal web platform, the PhilamWebmaster, regularly updates the employees about various policies and developments relating to employee |

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| | | <p>Examples of mechanisms for employee participation include: employee representation on boards; and governance processes such as works councils that consider employee viewpoints in certain key decisions. With respect to performance enhancing mechanisms, employee stock ownership plans or other profit sharing mechanisms are to be found in many countries.</p> | <p>welfare. The Company thus not only promotes health and well-being of its employees, but a safety and healthy workplace as well.</p> <p>Source Document:</p> <ul style="list-style-type: none"> ▪ 2018 Annual Report, page 59 – BPI-PHILAM IS A SAFE, HEALTHY AND SECURE WORKPLACE ▪ 2018 Annual Report, page 26 – PROMOTING HEALTH AND WELL BEING |
| C.3.3 | Does the company have training and development programmes for its employees? | | <p>Y</p> <p>In 2018, initiatives to drive effective leadership were implemented nationwide to guide managers to explore, enhance and refine understanding of their people’s workplace need and use available resources to address them. All people managers were invited to undergo a workshop designed to help them understand, measure and create engagement. As a way to empower our leaders to take charge of their team’s engagement, toolkits were provided to remind managers of the things vital to employee engagement and help them celebrate important occasions and milestones within the team.</p> <p>We also launched I Make It Possible, a leader-led workshop that introduced the 4 steps to make any circumstance possible as we want to instil the culture of creative thinking, innovation and collaboration within the organization. This initiative took us a step closer to achieving our goals.</p> <p>Apart from the regular developmental courses, the Leadership Accelerator Program (LEAP) was launched to pave the way and accelerate development of future leaders. The LEAP program enabled and prepared 29 individual contributors to transition to their managerial roles by undergoing several learning programs and revalida.</p> <p>Our employees are at the cornerstone of our business. It is our responsibility to ensure that our employees are engaged, motivated and committed so that the organization can achieve its goals. We have launched a program called Stellar Awards to recognize team members for their outstanding leadership, for providing service that is above and beyond what is expected and for demonstrating exemplary behaviour that contributed to achieving our strategic priorities. Moreover, we also opened the retirement plan voluntary contribution for employees last March 2018 as we fully support</p> |

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| | | | | <p>financial preparedness most especially for our employees.</p> <p>Source Document:</p> <ul style="list-style-type: none"> ▪ 2018 Annual Report, page 24 – EMPLOYEE ENGAGEMENT ▪ Email Announcements on Employee Training |
| C.3.4 | Does the company publish relevant information on training and development programmes for its employees? | | Y | <p>BPLAC provides relevant information on the training and development programmes for its employees.</p> <p>In 2018, initiatives to drive effective leadership were implemented nationwide to guide managers to explore, enhance and refine understanding of their people’s workplace need and use available resources to address them.</p> <p>We also launched I Make It Possible, a leader-led workshop that introduced the 4 steps to make any circumstance possible as we want to instil the culture of creative thinking, innovation and collaboration within the organization. This initiative took us a step closer to achieving our goals.</p> <p>Apart from the regular developmental courses, the Leadership Accelerator Program (LEAP) was launched to pave the way and accelerate development of future leaders. The LEAP program enabled and prepared 29 individual contributors to transition to their managerial roles by undergoing several learning programs and revalida.</p> <p>We have launched a program called Stellar Awards to recognize team members for their outstanding leadership, for providing service that is above and beyond what is expected and for demonstrating exemplary behaviour that contributed to achieving our strategic priorities.</p> <p>Moreover, we also opened the retirement plan voluntary contribution for employees last March 2018 as we fully support financial preparedness most especially for our employees.</p> <p>Source Document:</p> <ul style="list-style-type: none"> ▪ 2018 Annual Report, page 24 – EMPLOYEE ENGAGEMENT ▪ Email Announcements on Employee Training |
| C.3.5 | Does the company have a reward/compensation policy that accounts for the performance of the company beyond short-term financial measures? | | Y | <p>The Company also has long-term incentive programs that provides executives certain rewards depending on the performance of the company. The Long Term Incentive (LTI) Plan is a discretionary scheme provided by AIA to motivate and reward executives who have not only made a significant contribution to AIA’s and Philam Life’s</p> |

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| | | | | <p>performance and success, but also have the potential to contribute more in the future. It operates through the grant of Restricted Share Units (RSU).</p> <p>Source Document:</p> <ul style="list-style-type: none"> ▪ 2018 Annual Report, page 54 – REWARDING PERFORMANCE |
| C.4 | Stakeholders including individual employee and their representative 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. | | | |
| C.4.1 | Does the company have procedures for complaints by employees concerning illegal (including corruption) and unethical behaviour? | | Y | <p>BPI-Philam has and follows its procedures for complaints concerning illegal and unethical behaviour. Employees in BPI-Philam are required to report any illegal and unethical behaviours including corruption. The procedures are disclosed in the AIA Code of Conduct and the Whistleblower Protection Policy.</p> <p>Source Document:</p> <p>2018 Annual Report, page 68 – The Whistleblow Program</p> |
| C.4.2 | Does the company have a policy or procedures to protect an employee/person who reveals illegal/unethical behavior from retaliation? | | Y | <p>BPI-Philam complies with the AIA Code of Conduct, which provides for the general provision regarding the protection extended to employees who reported or is going to report any illegal or unethical behaviour. It specifically pointed to the AIA Group Whistleblower Protection Policy. To reinforce the AIA Code of Conduct, there is also the AIA Group Compliance Whistleblower Programme Standard Operating Procedure which particularly mentions the protection program including protection from retaliatory acts from the alleged erring employee. Speak up culture is being encouraged and widely promoted in BPI-Philam. Posters are displayed and brochures are distributed to promote reporting whenever employees see or suspect potential misconduct or fraud. An AIA Ethics line was developed to support the program wherein an employee may choose to be anonymous. It is an independently managed website and hotline (telephone) service, receiving reports in local language, 24 hours a day, and 7 days a week.</p> <p>Source Document:</p> <p>2018 Annual Report, page 68 – The Whistleblow Program</p> |