



**Simbag sa Emerhensya asin Dagdag Paseguro
Mutual Benefit Association Inc. (SEDP MBA)**

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SEDP MBA Whistleblower Protection Policy

Simbag sa Emerhensya asin Dagdag Paseguro Mutual Benefit Association Inc. (SEDP MBA) requires Board of Trustees, Management and Employees to observe high standards of service and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of SEDP MBA we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that SEDP MBA can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of SEDP MBA's code of ethics or suspected violations of law or regulations that govern SEDP MBA's operations.

No Retaliation

It is contrary to the values of SEDP MBA for anyone to retaliate against any Board of Trustees member, Officer or Employee who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of SEDP MBA. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Reporting Procedure

SEDP MBA has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their immediate superior. If you are not comfortable speaking with your immediate superior or you are not satisfied with your immediate superior's response, you are encouraged to speak with the MBA Manager, or to a Board of Trustees member. Immediate Superior or MBA Manager are required to report complaints or concerns about suspected ethical and legal violations in writing to SEDP MBA's Anti-Fraud/Compliance Officer or Audit Committee Chair, who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to the Anti-Fraud/Compliance Officer.

Anti-Fraud/Compliance Officer

The SEDP MBA's Anti-Fraud/Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved¹. The Anti-Fraud/Compliance Officer will advise the Manager and/or the Board of Trustees through the Audit Committee of all complaints and their resolution which will then later on report to the Board en banc on compliance activity relating to accounting or alleged financial improprieties.

¹ See Process Flow for reporting Fraudulent Activity – Anti-Fraud Plan

Accounting and Auditing Matters

The SEDP MBA's /Anti-Fraud/Compliance Officer shall immediately notify the Board Audit Committee of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The SEDP MBA's Anti-Fraud/Compliance Officer will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Approved by the Board of Trustees this _____ day of _____ 2018