



MANILA JOCKEY CLUB, INC.
San Lazaro Leisure Park, Brgy. Lantic,
Carmona, Cavite

WHISTLE-BLOWING POLICY

In compliance with the Securities and Exchange Commission Memorandum Circular No. 19 series of 2016, otherwise known as the Code of Corporate Governance for Publicly-Listed Companies,¹ the Board of Directors of Manila Jockey Club, Inc. adopts the following Whistle-Blowing Policy subject to the provisions of the Corporate Governance Code and all applicable laws of the Philippines

I. PURPOSE

This policy aims for the optimal regulation of the procedure for reporting any perceived malpractice and possible serious violations of the company's code of conduct and/or Philippine laws. It also aims to ensure employees that raising such information is being encouraged by the company and that this will be dealt through a thorough investigation.

II. DISTRIBUTION

This policy shall apply to all employees and consultants of the Manila Jockey Club, Inc. as well as its stakeholders (i.e. clients, suppliers, contractors, service providers).

III. WHISTLE BLOWING DEFINED

Whistle Blowing is defined as raising any information that pertains to suspected malpractice, illegal acts or violation of the Code of Conduct within the company. Information raised are seen as vital for the proper regulation of the company operations, sustaining company's good reputation and upholding the management's commitment to the highest corporate governance standards. Employees, consultants and stakeholders may disclose the involvement of any employee, executive, and consultant of the company to any of the following:

- Major or gross violation of company rules and regulation and Code of Conduct
- Corruption, malversation, and deliberate mismanagement/abuse of company funds and resources
 - Engaging in fraudulent acts
 - Abuse of authority and possible conflict of interests

¹Hereinafter referred to as the "Code."



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- Any other analogous acts

IV. ROLES AND RESPONSIBILITIES

Employees have the responsibility to uphold the highest standard of honesty and integrity by reporting witnessed/perceived malpractice, illegal acts, or violation of the Code of Conduct within the company. Employees have personal knowledge about the different circumstances and events happening inside the company that the management may overlook and this information should be reported to the management as soon as possible with as much details and evidences as they can provide in order to be dealt with immediately and thoroughly.

The management has the responsibility to provide avenues for employees, consultants and its stakeholders to be able to raise concerns with security and confidentiality and to ensure that this information will be taken seriously. Should the employees, consultants and stakeholders do report their concerns, the management has the responsibility to protect the whistle blower from possible reprisals, harassment or victimization when concerns have been raised in good faith. The management also has the responsibility to thoroughly investigate the raised concerns and to give feedback to the whistle blower regarding the status and the result of investigation.

The investigating committee, which members will be determined every time an allegation will be raised, will be responsible for the thorough investigation of the allegations and confirmation of the authenticity of evidences and information. They are also responsible for keeping the confidentiality of the identity of the whistle blower and the information gathered. Once the investigation process is completed, the committee has the responsibility to report the results to the management for proper action.

V. PROCEDURES AND GUIDELINES

a. Whistle-blowing

Employees who have observed or have personal knowledge about malpractices or violations must immediately inform the management of such acts in good faith.

Reports must be supported by factual evidences which will be of use in the investigation process and not just based on speculations.



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Reports will be taken into account and will be dealt with utmost confidentiality and gravity.

b. Investigation Process

All information received will be thoroughly investigated as soon as possible by a committee specifically created for the purpose of investigating each disclosed observed violations/malpractice.

Shall the committee determine that the allegations are true based on the results of the investigation, the matter shall be referred to the management for proper disciplinary action procedure as indicated in the company handbook.

Shall the committee determine that the allegations are false, no action will be taken against the whistle-blower for the allegations has been raised in good faith. In the event that the allegation has been found to be raised in bad faith with the intent to defame the person or group of people, the whistle-blower will be subjected to proper disciplinary action procedure as indicated in the company handbook.