



Home Guaranty Corporation

HGC Whistleblowing Policy

In line with the State's policy that the governance of the Government owned and controlled Corporations (GOCCs) shall be carried out in a transparent, responsible and accountable manner and with the utmost degree of professionalism and effectiveness, the Home Guaranty Corporation adopts the [GCG Memorandum Circular No. 2014-04 "Whistleblowing Policy for the GOCC Sector"](#).

In particular, HGC adhere to the procedures **Procedure on Handling Whistleblowing Reports** as found in Sec. 10 of GCG Memorandum Circular No. 2014-04:

XXX

10. Procedure on Handling Whistleblowing Reports

10.1. Filing of Whistleblowing Reports – All WRs must be submitted to the Governance Commission through any one of the Reporting Channels enumerated in Section 6.2

While WRs may be filed anonymously, the Whistleblower, whenever applicable, must state his/her connection to the GOCC concerned, as well as his/her general relationship to the Respondent, if any (e.g. Board Member, Officer, Employee, Customer, Supplier, Investor, Creditor or Concerned Citizen).

To aid the GIMC in evaluating and investigating the WRs, it is the duty of the whistleblower to include all relevant documents, files, photographs, videos, records, recordings, news clippings, and articles among others to support his/her reports and complaints.

10.2. Handling Initial Receipt of Whistleblowing Reports – the following GCG Officials will handle the receipt of WRs from the different Reporting Channels:

| Reporting Channel | Concerned GCG Official |
|---------------------------|-------------------------------|
| (a) Website | MIS |
| (b) Face-to-face meetings | Any Division Chief and Higher |
| (c) E-mail | Office of the General Counsel |
| (d) Mail | Office of the General Counsel |
| (e) Telephone | Any Division Chief and Higher |
| (f) Fax | Office of the General Counsel |



Home Guaranty Corporation

It is the duty of the concerned GCG Official in the cases of face-to-face meetings and teleconferences, to refer and fully disclose the WR to GIMC. The concerned GCG officials shall ask the Whistleblower if he is willing to sign the transcript of the discussions between them.

10.3. **Preliminary Evaluation of Whistleblowing Reports** – The concerned GCG Officials receiving WRs shall coordinate with the Office of the General Counsel for an initial evaluation of the information provided therein.

The information in a WR, whether anonymously filed or not, may be considered sufficient in form if:

- The GOCC of GCG Office concerned is identified;
- The Respondent is identified by his full name and position;
- Violations and/or charges are specified, including the relevant material facts (e.g. nature of the incident, time and places of the incident, persons involved, evidence, if any, and other important matters necessary to establish a case);
- The corresponding law, rules or regulations or Memorandum Circular provisions violated are specified; and
- Documents in support of the allegations are submitted.

The Office of the General Counsel will make the initial determination of whether or not information provided may be considered as a Reportable Condition, in which case the General Counsel will refer the same to the GICM for Appropriate Action.

If a General Counsel determines that such information does not qualify as a Reportable Condition, the same may be treated as an ordinary complaint which will be acted on in accordance with the rules of the Office of the General Counsel on ordinary complaints.

The Office of the General Counsel reserves the right to disregard WRs that are vague, ambiguous, patently without merit, or are clearly harassment complaints against the Respondent/s. The General Counsel shall communicate his/her findings on such WRs to the Whistleblower who will be given opportunity to substantiate the same, failing in which matters raised in the WR will be considered closed and terminated.

10.4. **Full Investigation** – if the GIMC finds the WR sufficient in form and substance, the GIMC shall conduct an investigation, part of which will involve informing the Respondent of the allegations against him/her and requiring the Respondent of the allegations against him/her and requiring the Respondent to submit comments within fifteen (15) days from receipt thereof. The GIMC may also seek the assistance of other government agencies in the conduct of investigation of the WRs.



Home Guaranty Corporation

The GIMC shall then furnish the Whistleblower a copy of the comments of the Respondent, and gave him/her opportunity to provide more information or controverting evidence. If the Whistleblower submits additional information or evidence, the GIMC shall likewise give Respondent the opportunity to submit rebutting evidence.

If the GIMC is satisfied that all information and evidence necessary for the resolution of the WR are already on hand, it may proceed to draft the corresponding resolution of the WR, and submit its recommendation to MANCOM.

10.5. Monitoring – The GIMC shall submit to MANCOM a quarterly status report of all WR with the corresponding actions taken thereon.

XXX

