

POLICY ON ACCOUNTABILITY, INTEGRITY & VIGILANCE
(Whistleblowing Policy)

A. Rational and General Policy

2GO expects its director, officers, and 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. As such, the Company's various stakeholders may use the Policy on Accountability, Integrity & Vigilance (PAIV) to report questionable activity, unethical conduct, fraud or malpractice.

Everyone is expected to help and work towards creating an environment wherein concerns may be raised for possible violations of the Company's Code of Business Conduct, other relevant internal policies, and all pertinent laws, rules and regulations - so that said concerns may be resolved in a timely fashion.

B. Reporting Mandate

It is the responsibility of all directors, officers, and employees to comply with and to report violations or suspected violations of the Code of Business Conduct, other relevant internal policies, and all pertinent laws, rules and regulations, in accordance with this policy.

C. Reporting in Good Faith

Anyone filing a 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 of the Code, other relevant internal policies, and all pertinent laws, rules and regulations. 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.

Reports made in good faith are fully protected by this policy; even if the report, after investigation, is not substantiated.

D. No Retaliation

Anyone who in good faith reports a violation of the Code, other relevant internal policies, and all pertinent laws, rules and regulations shall not be retaliated upon or suffer harassment or adverse employment consequence.

E. The Escalation Process of Raising Concerns

Violations or suspected violations of Company's policies may be escalated to any of the following:

- The Head of HR
- The Head of Compliance
- The Head of Internal Audit

Aforementioned Heads shall acknowledge receipt of complaints (*in writing*) within 24 hours from receipt of same.

F. Confidentiality

Upon the request of the complainant, the Company shall 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 investigation.

Concerns raised anonymously shall not be entertained.

G. Handling of Reporting Violations

The Company's Code of Business Conduct, and other relevant rules and regulations, shall serve as guides in determining the penalties and sanctions to be imposed by HR where violations are proven and validated by the Head of Internal Audit.

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

Reports/disclosures may be sent to any of the aforementioned officers or to governance@2go.com.ph.