

CENTRO ESCOLAR UNIVERSITY

WHISTLEBLOWING POLICY

I. Statement of Policy

Centro Escolar University (“the University”), in line with its policy of Science and Virtue, shall at all times uphold the core values of accountability, integrity, and trustworthiness. This Whistle Blowing Policy is hereby promulgated in order to provide another avenue for checks and balances in the operations of the University.

II. Definition of terms

“Administrative Council” – shall refer to the central administrative and management body of the University.

“Audit Committee” – shall refer to the duly elected committee in the Board of Directors.

“Board of Directors” - the governing body elected by the stockholders that exercises the corporate powers of a corporation, conducts all its business and controls its properties.

“Commission” – shall refer to the Securities and Exchange Commission.

III. Reporting Mechanism and Corrective Measures

University stakeholders may report any matter regarding the legitimacy, integrity, regularity, and legality of any University transaction, action, or process.

The report shall be in writing. So as not to defeat the purpose of this policy, however, there is no format required other than that it is properly signed and should pertain to matters relevant to the affairs of the University. In order to promote transparency and for proper communication with the complainant for updates, anonymous complaints are discouraged.

All reports shall be treated with utmost confidentiality.

There shall be a three (3) person panel exclusively consisting of Independent Directors and Non-Executive Directors. This panel shall take cognizance of all reports, and after verification, shall refer the matter to the appropriate body for action.

The University shall safeguard against any retaliation in any manner against an employee who reports in good faith violations or suspected violations of this policy. Aware of possible abuse, however, irresponsible and indiscriminate accusations shall be dealt with accordingly in accordance with University Policies.

Should a particular University transaction, action, or process be found to be irregular, the University is empowered to take all the necessary steps in mitigating any and all adverse effects of said transaction, action, or process.

IV. Self-Assessment and Periodic Review of Policy

The University Administration shall conduct a periodic review of the effectiveness of the University's system and internal controls assess consistency with the board-approved policies and procedures.

This policy shall be reviewed and evaluated annually and shall be updated regularly to remain consistent with the law and current best practices.

This Whistle Blowing Policy is approved by the Board of Directors on _____ and shall take effect immediately.