



Whistleblowing Policy

1. Introduction

AIB Money Market Mutual Fund, Inc. (the “Corporation”) Whistleblowing Policy outlines the procedures and protections for employees of the Fund Manager, stakeholders, and third parties to report concerns regarding unethical behavior, misconduct, fraud, or any other wrongdoing within Investment Companies in the Philippines. This policy is designed to encourage the reporting of such issues and provide safeguards for whistleblowers.

2. Objective

The objective of this policy is to establish a mechanism that enables individuals to report concerns and to ensure that appropriate action is taken promptly to investigate and address any reported wrongdoing within Investment Companies. It aims to foster a culture of integrity, transparency, and accountability within the organization.

3. Procedure

3.1 Reporting Channel for the Corporation

a. Internal Reporting

Employees of the Fund Manager, contractors, and stakeholders are encouraged to report concerns through designated internal channels. These channels may include reporting to the immediate supervisor, human resources department, or compliance officer. It is recognized that for any number of reasons, employees may not feel comfortable reporting potential violations. In these cases, anonymous reports may be submitted to the Compliance Officer.

b. External Reporting

In cases where individuals feel uncomfortable reporting internally or believe that internal reporting would be ineffective, they may report their concerns to external authorities such as regulatory bodies, industry associations, or law enforcement agencies.

3.2 Reporting Format and Supporting Documentation

Disclosures may be made orally or in writing (using the Whistleblower Report Form) attached to this policy. While the Corporation does not anticipate the employee of the Fund Manager to have absolute proof or evidence of the misconducts, malpractices or irregularities reported, the report must include a thorough disclosure of all pertinent information and supporting records.

4. Protection of Whistleblowers

a. Confidentiality

The identity of the whistleblower will be treated as confidential to the fullest extent possible, consistent with a thorough and fair investigation. Confidentiality will be maintained unless required by law or necessary for the investigation.

b. Non-Retaliation

The Corporation strictly prohibit retaliation against individuals who report concerns in good faith. Any form of retaliation, including but not limited to harassment, demotion, termination, or discrimination, will not be tolerated. Whistleblowers who experience retaliation should report it immediately.

c. Anonymous Reporting

The Corporation provide mechanisms for anonymous reporting to encourage individuals who wish to maintain their confidentiality while reporting concerns. Anonymous reports may be submitted to the Compliance Officer. Anonymous reports will be treated with the same level of seriousness and addressed promptly.

5. Investigation Procedure

Upon receipt of a whistleblower report, the Corporation will promptly initiate an investigation. The investigation will be conducted impartially, objectively, and with due respect to the rights of all parties involved. Whistleblowers will be informed of the progress and outcome of the investigation to the extent permitted by law.

The format and length of an investigation will vary depending on the nature and particular circumstances of each complaint made. The matters may:

- i. be investigated internally;
- ii. be referred to the External Auditor; and/or
- iii. form the subject of an independent inquiry

The Chairperson of the Corporate Governance Committee or the person designated to investigate the complaint will write to the complainant whenever reasonably practicable of the concern being received:

- i. acknowledging that the concern has been received;
- ii. advising whether or not the matter is to be investigated further and if so what the nature of the investigation will be;
- iii. estimating the time it will take to complete the investigation and deliver a final answer informing the complaint of any initial inquiries made, if additional investigation will be conducted, and, if not, why.

6. Disciplinary Actions

If an investigation substantiates the reported wrongdoing, appropriate disciplinary action will be taken against the individuals involved, which may include but is not limited to warnings, retraining, suspension, termination, or legal actions as deemed necessary.

7. Training and Awareness

The Corporation will provide regular training and awareness programs to employees of the Fund Manager, stakeholders, and relevant parties about this whistleblowing policy, the importance of reporting concerns, and the protection available to whistleblowers.

8. Review and Updates

This policy will be reviewed periodically to ensure its effectiveness and compliance with relevant laws and regulations. Updates will be made as necessary to address emerging challenges or changing circumstances.

9. Legal Compliance

This Whistleblowing Policy is in accordance with the laws, regulations, and guidelines governing Investment Companies in the Philippines. AIB Money Market Mutual Fund, Inc. will ensure compliance with the applicable legal requirements and cooperate with regulatory authorities as required.

By implementing this Whistleblowing Policy, the Corporation aims to create a safe and transparent environment that promotes ethical conduct and upholds the integrity of the industry.

**WHISTLEBLOWER REPORT FORM
(CONFIDENTIAL)**

AIB Money Market Mutual Fund, Inc. is dedicated to upholding the greatest standards of transparency, honesty, and responsibility. In keeping with that commitment, the corporation encourages staff members to voice concerns and report improper behavior or other anomalies in any situation involving the corporation.

The purpose of the whistleblowing policy is to (as much as is practical) encourage and support whistleblowers in providing information pertinent to misconducts, malpractices, or irregularities through a confidential reporting channel. The Corporation will handle this report with care and will treat the Whistleblower's concerns fairly and properly.

If you wish to make a written report, please use the report form below. Once completed, this report becomes confidential. You may send the report, marked "Strictly Private and Confidential – to be opened by Addressee Only" and addressed to the Compliance Officer, by post to the relevant address below or by email to "complianceofficer@aibaami.com"

To: AIB Money Market Mutual Fund, Inc.
11F Multinational Bancorporation Centre, 6805 Ayala Avenue, Makati City 1226

Your Name/Contact Number and Email

We encourage you to provide your name with this report. Concerns raised in an anonymous manner are significantly less powerful but they will be considered as far as practicable.

Name:

Address:

Tel. No.:

Email Address:

Date:

The names of those involved (if known):

Details of concerns:

Please provide full details of your concerns: Names, dates and places and the reasons for the concerns (continue on separate sheet if necessary) together with any supporting evidence/documents.