

WHISTLEBLOWER POLICY

I POLICY STATEMENT

GLOBE is committed to comply with laws and regulations and to conduct its business in accordance with ethical standards. All officers and employees of the Company, and all suppliers and business partners of the company, are thus required to observe and practice high standards of business and personal ethics in the conduct of their duties and responsibilities.

This Policy provides a formal mechanism for employees, suppliers and third parties to submit reports of improper activities perpetrated by the company's employees, officers and directors, and suppliers and partners, that violate laws and regulations, company policies, the company's Code of Conduct, or which violate the company's ethical standards. Submitted reports will be investigated according to the protocols established in this policy, and the company shall protect the responsible submission of complaints and disclosures made in good faith.

In all instances the Company retains the prerogative to determine when circumstances warrant an investigation and, in conformity with this Policy and applicable laws and regulations, the appropriate investigative process to be employed.

II COVERAGE

This Policy provides a formal mechanism for any person, whether employed by Globe or not, to submit information or allegations of suspected conflicts of interest, misconduct or policy violations, theft, bribery, fraud or misappropriation, falsification of documents, financial reporting concerns and retaliation complaints, and unethical practices.

III Definitions

Improper Activity. Any activity by a Company officer, employee, supplier or business partner, which does not conform to approved standards of social or professional behavior, such as:

- a. Violations of the Company's Manual of Corporate Governance
- b. Violations of the Company's Code of Conduct and Anti-Corrupt Practices Policy
- c. Acts of Company asset misappropriation
- d. Fraudulent reporting practices
- e. Acts of impropriety (e.g., child labor, sexual harassment)
- f. Acts that may damage Company reputation

Disclosure. Any communication on, or allegation of, Improper Activity



Protected Disclosure. Communication made in good faith where the information disclosed provides information and evidence of the improper activity.

Whistleblower Channels: The Globe Whistleblower Network Portal (GWeN) has been set up for the purpose of receiving Disclosures. Reports received via mail, electronic mail, mobile telephone shall be redirected to the GWeN Portal for proper disposition by the Disclosure Administrator.

Disclosure Committees. The individuals identified to investigate and manage Disclosures made under this Policy.

Individuals implicated in an Improper Activity:

- a. Reports that implicate member/s of Globe Senior Management (CEO, EVP, SVP) and their Executive Assistants shall be sent to the Audit Committee Chairman,
- b. Reports that implicate member/s of Globe's Board of Directors shall be sent to the Lead Independent Director,
- c. Reports that implicate the Audit Committee Chair and/or the Lead Independent Director shall be sent to the Chairman of the Board,
- d. Reports implicating Globe employees (VP & below), suppliers/vendors, business partners shall be sent to the Globe Disclosure Committee.

Disclosure Administrator. The entity in charge of administering the Whistleblower Portal, and receiving, collating and screening submitted Disclosures, endorsing Disclosures to designated individuals for investigation and management, keeping track of the status of investigations and making reports to the Audit Committee.

IV Form and Contents of Disclosure

1. A Disclosure shall be made by accessing the GWeN Portal, which has been created to capture information and detail regarding an improper activity, preserve the anonymity of the Whistleblower and ensure escalation to Disclosure Committees for investigation and resolution. Reports received via mail, electronic mail and mobile telephone messages will be redirected to the GWeN Portal. Verbal disclosures must be reduced to some form of writing, and persons receiving verbal disclosure who wish to escalate the same for action to the Disclosure Committee/s must reduce the same into writing.
2. A Whistleblower shall have the option to identify himself and/ or sources of his information (if any), or withhold his identity and/or those of his sources.
3. Disclosures must indicate the specific facts that have lead the Whistleblower to believe that an improper activity has been or is being committed. Disclosures must be coherent, alleged facts rather than conclusions or speculations, and should contain as much specific information as possible to allow for proper assessment of the need, nature, extent, and urgency of action thereon.

V Reporting Allegations of Suspected Improper Activities

1. Any person who has knowledge of a suspected improper activity has the duty to make a Disclosure;
2. Disclosures shall be submitted or reported through the Globe Whistleblower Network facility (GWeN Portal). Whistleblowers who submit their reports through mail, electronic mail, mobile telephone shall be re-directed to the portal.
3. The Complaint Administrator shall be in-charge of administering the portal, and receiving collating and submitting all Disclosures to the proper Disclosure Committee.
4. The Disclosure Administrator shall send a notice to the Whistleblower that the report has been received and that it shall be processed in accordance with the Policy.

VI Evaluation of the Protected Disclosure and Investigation of the Suspected Improper Activity

1. There are four (4) Disclosure Committees:
 - a. The Audit Committee Chairman – for reports that implicate member/s of Globe Senior Management (CEO, EVP, SVP) and their Executive Assistants.
 - b. The Lead Independent Director – for reports that implicate member/s of Globe’s Board of Directors,
 - c. Chairman of the Board – for reports that implicate the Audit Committee Chairman and/or the Lead Independent Director,
 - d. Globe Disclosure Committee comprised of the Chief HR Officer, Chief Audit Executive and the Chief Compliance Officer – for reports implicating Globe employees (VP & below), suppliers/vendors and business partners.
2. The members of each of the Disclosure Committees shall be persons of known objectivity, trustworthiness, sound judgment, and with a good working knowledge of the operations of the company.
3. Each of the Disclosure Committees shall evaluate the report from the Whistleblower and determine if an investigation is warranted. An investigation will be conducted if:
 - a. Subject of the complaint is covered by this Whistleblower Policy;
 - b. The report is supported by evidence or at least, includes sufficient details which can be validated and used as basis for conducting an investigation; and
 - c. The report and incidents stated are not patently false, malicious, intended to harass, or makes a mockery of this Whistleblower Policy, or
 - d. Any of the Disclosure Committees determines that an investigation should be made.
4. If an investigation is warranted, the Disclosure Committee shall either conduct the investigation or designate an investigations handler who will conduct a fact finding investigation. The investigations handler shall submit to the Committee of his finding

- of facts. Investigations shall be carried out in accordance with company policies and best practices in investigation, and without compromising the civil rights of any person.
5. The investigations handler shall submit to the Disclosure Committee which assigned him the investigation a Report on the results of the investigation for the imposition of the appropriate action/s, if warranted by such result.
 6. If the improper activity subject of the investigation has a significant financial and/or reputation risk impact to the Company, the Disclosure Committee shall forward the Report of the investigations handler to the Audit Committee within ten (10) days from receipt of the Report. The Audit Committee shall determine if the report shall be further escalated to the Board of Directors.
 7. If the Report of the investigations handler includes a finding of civil or criminal liability on the part of the Investigation Subject, the Disclosure Committee shall forward to the Legal Division a copy of the Report for the filing of the appropriate legal action.
 8. The Disclosure Committee shall state in its report whether or not the result of the investigation shall be included in the employee's 201 file or in the vendor accreditation files of the vendor or business partner.
 9. The Disclosure Administrator shall be responsible for keeping track of the status of investigations and actions on Disclosures and preparing a monthly report to the Audit Committee on the action taken.

VII Roles, Rights and Responsibilities of Whistleblowers, Investigation Participants, and Subject of the Investigation

Whistleblowers

1. Whistleblowers provide initial information related to a reasonable belief that an improper activity has occurred. The motivation of the whistleblowers is irrelevant to the consideration of the validity of the allegations. However, the intentional filing of the false report is itself considered an improper activity which the Company has the right to act upon.
2. Whistleblowers shall refrain from obtaining evidence for which they do not have a right of access.
3. Whistleblowers have a responsibility to be candid. They should set forth all known information regarding any reported allegations. Persons making a report of alleged improper activities should be prepared to be interviewed by investigators.
4. Anonymous whistleblowers must provide sufficient corroborating evidence to justify the commencement of an investigation. An investigation of unspecified wrongdoing or board allegations will not be undertaken without verifiable evidentiary support. Because investigators are unable to interview anonymous whistleblowers, it may be more difficult to evaluate the credibility of the allegations and therefore, less likely to cause an investigation to be initiated.

5. Whistleblowers are reporting parties, not investigators. They are not to act on their own conducting any investigative activities, nor do they have a right to participate in any investigative activities other than as requested by investigators.
6. Protection of a whistleblower's identity will be maintained to the extent possible within the legitimate needs of law and the investigation. Should the whistleblower self-disclose his or her identity, the Company will no longer be obligated to maintain such confidence.
7. Whistleblowers have a right to be informed of the disposition of their disclosure absent overriding reason as determined by the Audit Committee.

Investigation Participants

1. Company employees who are interviewed, ask to provide information, or otherwise participate in an investigation have a duty to fully cooperate with the Company-authorized investigators.
2. Participants should refrain from discussing or disclosing the investigation or their testimony with anyone not connected to the investigation. In no case should the participants discuss with the investigation subject the nature of evidence requested or provided or testimony given to investigators unless agreed to by the investigator.
3. Request for confidentiality by participants will be honored to the extent possible within the legitimate needs of law and the investigation.
4. Investigation participants have a responsibility to further the investigation and assure its timely completion. Evidence shall not be simulated, withheld, destroyed, or tampered with; testimony shall not be fabricated, altered or withheld, or intentionally made misleading; and witness shall not be influenced, coached, or intimidated. Any act in violation of this paragraph or any other attempt to obstruct the investigation, shall be considered an offense subject to disciplinary action.

Investigation Subjects

1. A subject is a person or persons who is/are the focus of investigation as a result of a Disclosure. The decision to conduct an investigation is not an accusation; it is to be treated as a neutral fact finding process. The outcome of the investigation may or may not support a conclusion that an improper act was committed and, if so, by whom.
2. The identity of a subject should be maintained in confidence to the extent possible given the legitimate needs of law and the investigation.
3. The Disclosure Committee shall determine the opportune time to inform Subjects of the allegations. Once informed, they shall have opportunities for input during the investigation.
4. Subjects have a duty to cooperate with investigators. They should be informed, however, that they have a right against self-incrimination under the law.
5. Subjects have a right to consult with a person or persons of their choice. This may involve representation, including legal representation.

6. Subjects are free at any time to retain their own counsel to represent them with regard to the investigation.
7. Subjects have a responsibility not to interface with the investigation and adhere to admonitions from investigations in this regard. Evidence shall not be simulated, withheld, destroyed or tampered with by the subject; testimony shall not be fabricated, altered or withheld, or intentionally made misleading by the subject; and witnesses shall not be influenced, coached, or intimidated by the subject. Any act in violation of this paragraph or any other attempt to obstruct the investigation, shall be considered an offense subject to disciplinary action.
8. Evidence shall not be withheld, destroyed, or tampered with, and witnesses shall not be influenced, coached, or intimidated, and any act of destruction or tampering, withholding of evidence, or any other attempt to obstruct the investigation, shall be considered an offense subject to disciplinary action.
9. Unless there are compelling reasons to the contrary, subject should be given the opportunity to respond to material points of evidence contained in an investigation report.
10. Subjects have a right to be informed of the outcome of the investigations.
11. Any disciplinary or corrective action initiated against the subject as a result of an investigation pursuant to this shall adhere to applicable personnel conduct and disciplinary procedures.

VIII Whistleblowers Protection Policy

1. A Disclosure shall be deemed Protected Disclosures if they are made in good faith and with a reasonable belief that there has been an improper activity committed, or that one is being or about to be committed. A complaint made in good faith with a reasonable basis for belief shall be deemed a Protected Disclosure even if it subsequently turns out to be untrue. However, complaints which are patently false, simulated, malicious, intended to harass, slur or cast aspersions on the character or service record of a person, or disrupt to company's operations, without any reasonable basis for a belief that an improper activity has been committed, or make a mockery of this Whistleblower Policy, shall not be deemed a Protected Disclosure.
2. The Disclosure Administrator shall evaluate if a Disclosure is a Protected Disclosure or not, and shall endorse evaluated Protected Disclosures to the Disclosure Committee for confirmation.
3. A Whistleblower making a protected Disclosure shall be entitled to the protection of this policy provided that he himself is not complicit to the improper activity reported. In particular, he shall not be subject to dismissal, demotion, any form of harassment or discrimination, or current or future bias in performance evaluation, by virtue of his having made a Protected Disclosure.

4. If the Whistleblower is not an employee, but a vendor, supplier or business partner, the Whistleblower shall not be denied future business of the company solely on the basis of his having made a Protected Disclosure; unless it also appears from the facts of the case that the Whistleblower participated in the prohibited conduct with sufficient knowledge that the same was illegal, prohibited, unethical, or would be to the detriment and prejudice of Globe.
5. The Disclosure Committee may, under exceptional circumstances, with the endorsement of the President and with the approval of the Board of Directors, grant immunity to a Whistleblower who has participated in the improper activity reported. In any event, immunity may only be granted to a Whistleblower under the following conditions: *first*, the Whistleblower whose immunity is being sought is not the most guilty of the subjects of the investigation; *second* that his testimony is absolutely indispensable to the investigation and without it, the company would not be able to take appropriate action; and *third*, that he extends full cooperation to the investigation.
6. A whistleblower who subsequently withdraws his Disclosure shall not be entitled to the protection of this Policy.
7. The Disclosure Committee shall designate a representative of the Human Resources Group as a Whistleblower Protection Officer to ensure that Whistleblowers are accorded the proper protection under this policy.
8. The members of the Disclosure Committees shall likewise be protected in the reasonable exercise of their functions under this Policy, and shall be indemnified by the company on the event of suit or claims for all actions taken by them in accordance with this policy.

IX Dissemination and Amendment of the Policy

The Human Resources Group shall be responsible for the public dissemination of this Policy across the company. Where necessary, HRG shall arrange for appropriate training to be given to members of the Disclosure Committee and to persons who will be involved in the implementation of this policy.

The Company may amend the provisions of this Whistleblower Policy. Any amendment, however, shall be effective after due notice is given to the officers and employees of the Company.