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1.0 Objective

Pursuant to Governance Commission for GOCCs (GCG) Memorandum Circular No. 2025-01 dated 13 January 2025 otherwise known as the Whistleblowing and Integrity Program for the GOCC Sector, which repealed and superseded GCG Memorandum Circular Nos. 2014-04, 2016-02, and 2023-03, the Light Rail Transit Authority (LRTA) hereby adopts this LRTA Whistleblowing Policy establishing a secure, reliable, and effective mechanism for reporting acts or omissions that may violate or erode the integrity within the LRTA.

This Policy seeks to motivate and empower whistleblowers to report illegal or unethical acts, violations of good governance principles, acts against public policy and morals, unsound or unhealthy business practices, or matters grossly disadvantageous to the LRTA, the State, or the public.

Furthermore, this Policy promotes transparency, accountability, and institutional integrity by ensuring the proper handling, evaluation, and disposition of whistleblowing reports and by affording protection to whistleblowers. It enables any concerned individuals to report, submit information, anonymously if desired, and, when necessary, testify regarding actions or omissions of LRTA directors, officers, and employees that constitute Reportable Conditions under this Policy.


2.0 Scope

This Policy shall be applicable to all members of the LRTA Board of Directors, officers, and employees, whether permanent, temporary, or co-terminus who shall, for purpose of this Policy, be collectively referred to as Reportable Persons. It shall likewise apply to individuals engaged by LRTA under Contract of Service (COS), Job Order (JO), or consultancy arrangements, in accordance with the terms and conditions of their respective engagements.

This covers reports on acts or omissions by the foregoing individuals that are illegal, unethical, contrary to principles of good governance, violative of public policy and morals, promotive of unsound or unhealthy business practices, or grossly disadvantageous to the LRTA, the State, or the public interest.

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3.0 Definitions of Terms

- 3.1 **“Alternative Reporting Channels”** refer to reporting mechanisms or platforms not designed, established, or administered by LRTA, through which whistleblowers may lawfully submit disclosures, complaints, or reports of irregular, unethical, or improper acts. These channels operate outside the LRTA’s internal reporting system and may include those designated or maintained by oversight bodies, regulatory agencies, and other competent authorities authorized to receive and act upon Whistleblowing Reports in accordance with applicable laws, rules, and regulations.
- 3.2 **“Confidential Information”** refers to any data, document, report, identity, or communication related to a Whistleblowing Report, including the identities of the whistleblower, respondent, witnesses, and any evidence or findings obtained during evaluation or investigation.
- 3.3 **“Docketing”** refers to the process of officially recording, assigning a reference number, and entering a Whistleblowing Report or Retaliation Complaint into the registry of the Fact-Finding Committee for monitoring and tracking.
- 3.4 **“Evidence”** refers to any documentary, testimonial, digital, or physical material submitted to substantiate a Whistleblowing Report, including but not limited to photographs, recordings, files, correspondences, and verified statements.
- 3.5 **“Fact-Finding Committee”** refers to the body duly constituted by LRTA to receive, assess, and conduct the preliminary evaluation and fact-finding of Whistleblowing Reports filed under this Policy. The Fact-Finding Committee (FFC) is responsible for determining the sufficiency in form of reports, undertaking fact-finding activities when warranted, and recommending or initiating the appropriate referral, whether to the proper administrative committee, or to external authorities for criminal action, consistent with applicable laws, rules, and LRTA policies.
- 3.6 **“Good Faith”** refers to the honest and sincere intention of a whistleblower to report a perceived wrongdoing based on personal knowledge or verifiable information, without malice, ill motive, or intent to unjustly harass any person.

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- 3.7 **“Identity-Disclosure Breach”** refers to any unauthorized release or revelation of the identity of the whistleblower, respondent, or witness involved in the Whistleblowing process.
- 3.8 **“Interference”** refers to any act intended to obstruct, hinder, influence, threaten, intimidate, or improperly affect a whistleblower, witness, or any official involved in the handling of a Whistleblowing Report or related investigation.
- 3.9 **“Investigation”** refers to the process undertaken by the LRTA administrative or disciplinary body to ascertain facts, evaluate evidence, and determine liability following the referral of a Whistleblowing Report.
- 3.10 **“Jurisdiction”** refers to the authority of a specific LRTA committee or external agency to take cognizance of, investigate, or resolve a Whistleblowing Report based on the nature of the alleged offense.
- 3.11 **“Malicious Complaint”** refers to a Whistleblowing Report filed with intent to harass, defame, or unduly cause injury to another person, or one that contains allegations known by the whistleblower to be false or fabricated.
- 3.12 **“Non-Referable Case”** refers to a Whistleblowing Report that fails to meet the minimum requirement of sufficiency, is vague, or unsubstantiated, patently without merit, or intended merely to harass, and is therefore dismissed.
- 3.13 **“Personal Knowledge”** refers to the facts derived from direct observation, experience, or involvement of the whistleblower, and not based solely on hearsay, assumptions, or speculations.
- 3.14 **“Preliminary Evaluation”** refers to the initial assessment conducted by the Fact-Finding Committee to determine the sufficiency in form of a Whistleblowing Report and whether it should be dismissed or referred to the appropriate committee or body.
- 3.15 **“Protected Disclosure”** refers to any Whistleblowing Report made in good faith that meets the minimum requirements prescribed under this Policy and entitles the whistleblower to protection against retaliation.

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- 3.16 **“Referable Case”** refers to a Whistleblowing Report that, after preliminary evaluation, satisfies the minimum requirements and is forwarded to the appropriate internal committee or external agency for further proceedings.
- 3.17 **“Reportable Persons”** refer to individuals subject to this Policy whose acts or omissions may constitute a Reportable Condition. This includes members of the LRTA Board of Directors, Officers, and Employees whether permanent, temporary, casual, or co-terminus, individuals engaged under Contract of Service (COS) or Job Order (JO), consultants, and other persons acting for or on behalf of LRTA.
- 3.18 **“Reportable Conditions”** refer to acts or omissions that may be the subject of a Whistleblowing Report which are considered as illegal, unethical, violate good governance principles, are against public policy or morals, promote unsound or unhealthy business practices, or are grossly disadvantageous to LRTA, the State, or the public.
- 3.19 **“Reporting Channels”** refer to the official mechanisms, platforms, or means recognized under this Policy through which whistleblowers may submit disclosures, complaints, or information regarding Reportable Conditions. Reporting Channels include all designated LRTA reporting mechanisms through which Whistleblowing Reports may be validly received and acted upon. These channels shall ensure the secure, confidential, and proper receipt, recording, and transmission of Whistleblowing Reports in accordance with this Policy.
- 3.20 **“Respondent”** refers to a Reportable Person who has been formally identified in a Whistleblowing Report as the individual alleged to have committed, participated in, or contributed to a Reportable Condition, and against whom fact-finding, administrative, or disciplinary proceedings are undertaken pursuant to this Policy.
- 3.21 **“Retaliation”** refers to any adverse action, threat, harassment, discrimination, reprisal, or detrimental act taken against a whistleblower or witness on account of the filing of a Whistleblowing Report or participation in an investigation.
- 3.22 **“Third Party”** refers to any person other than the whistleblower who may have direct knowledge of a Reportable Condition or may participate as a complainant or source of

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information, but who is not entitled to protection under this Policy unless separately covered under applicable law.

3.23 **“Whistleblower”** refers to any person or group of people who submits a Whistleblowing Report which includes such acts or omissions that are illegal, unethical, violate good governance principles, are against public policy and morals, promote unsound and unhealthy business practices, are grossly disadvantageous to the LRTA, the State, or the public, such as but not limited to the Reportable Conditions enumerated in Item 4.1.8 hereof.

3.24 **“Whistleblowing”** refers to the act of reporting, whether anonymously or not, any act or omission that possibly violates or erodes the integrity in the GOCC sector. It also includes the process of revealing wrongdoings within an organization that serves to uphold ethical standards and protect public interests.

3.25 **“Whistleblowing Report”** refers to any disclosure, complaint, or submission of information, whether made anonymously or not, concerning alleged acts, omissions, or practices that constitute Reportable Conditions under this Policy.

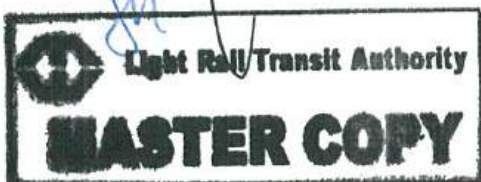
4.0 Policy


LRTA affirms that public office is a public trust and shall ensure that its affairs, operations, and business are conducted with utmost integrity, transparency, accountability, and in full compliance with applicable laws and regulations. LRTA shall institutionalize a secure, confidential, and effective mechanism for reporting, evaluating, and addressing Reportable Conditions and shall protect Whistleblowers against retaliation with GCG Memorandum Circular NO. 2025-01.

4.1 Fact-Finding Committee; Composition; Duties and Functions

4.1.1 LRTA shall constitute a Fact-Finding Committee (FFC), which shall serve as the primary body responsible for receiving, evaluating, and conducting the preliminary evaluation and fact-finding of all Whistleblowing Reports submitted under this Policy. Further, FFC shall have the primary task of implementing this Policy.

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4.1.2 The FFC shall be composed of eight (8) members, all of whom shall be officials or employees of LRTA. The composition shall be as follows:

4.1.2.1 One (1) member shall act as Chairperson who shall preside over all meetings, proceedings, and actions of the FFC;

4.1.2.2 One (1) member shall act as the Vice-Chairperson, who shall assist the Chairperson and act in his or her stead in case of absence or incapacity;

4.1.2.3 Four (4) regular members who shall participate in the receipt, evaluation, and preliminary assessment of Whistleblowing Reports; and

4.1.2.4 Two (2) employees who shall provide administrative, clerical, and technical support, including docketing, documentation, and maintenance of confidential records.


4.1.3 Members of the FFC shall serve for a term of two (2) years from the date of their appointment, unless sooner removed for cause or until their successors are duly appointed. Members may be reappointed for one succeeding term to ensure continuity and institutional memory. In the interest of uninterrupted operations, members shall continue to perform their functions in a hold-over capacity until their replacements are appointed; provided, that the hold-over shall not exceed ninety (90) calendar days from the expiration of the term.

4.1.4 The Chairperson shall convene the FFC as needed. FFC shall conduct the preliminary evaluation of Whistleblowing Reports and shall come up with a Resolution either dismissing the same or referring the same to appropriate investigating or administrative committee, body, or authority.

4.1.5 If a member of the FFC is alleged to have committed, participated in, or contributed to a Reportable Condition contained in the Whistleblowing Report, such member shall be excluded therefrom and the LRTA Administrator shall act as the FFC Chairperson.

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4.1.6 A member of the Fact-Finding Committee shall be excluded from the proceedings whether *motu proprio* or upon written request of any interested party addressed to the LRTA Administrator, on any of the following grounds:

4.1.6.1 Conflict of Interest – when the member has a direct or indirect personal, financial, or professional interest in the subject matter of the Whistleblowing Report, or stands to benefit or suffer from the outcome of the proceedings.

4.1.6.2 Relationship to Parties – when the member is related to the Whistleblower or the Respondent within the fourth (4th) civil degree of consanguinity or affinity, or has any relationship that may reasonably call into question the member's impartiality.

4.1.6.3 Bias or Prejudice – when there exist evidence or circumstance that reasonably create doubt as to the member's objectivity, neutrality, or ability to render an impartial assessment.

4.1.7 A member may be removed for any of the following causes, without prejudice to other administrative, civil, or criminal liabilities:

4.1.7.1 Breach of confidentiality or unauthorized disclosure of FFC information;

4.1.7.2 Retaliation or attempt to influence, intimidate, or interfere with a Whistleblower, witness, or official action;


4.1.7.3 Gross neglect of duty, inexcusable non-attendance;

4.1.7.4 Manifest bias or partiality, or conduct undermining the integrity or independence of the FFC;

4.1.7.5 Conflict of interest not timely disclosed or inadequately mitigated;

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4.1.7.6 Moral turpitude, dishonesty, or other acts seriously reflecting on fitness to serve; or

4.1.7.7 Violation of LRTA policies on data privacy, records management, or evidence handling.


4.1.8 Reportable Conditions

4.1.8.1 Whistleblowers may report acts or omissions that are illegal, unethical, violate good governance principles, are against public policy and morals, promote unsound or unhealthy business practices, or are grossly disadvantageous to LRTA, the State, or the public, such as but not limited to:

- a. Abuse of authority
- b. Bribery
- c. Conflict of interest
- d. Destruction/manipulation of records
- e. Fixing
- f. Inefficiency
- g. Making false statements
- h. Malversation
- i. Misappropriation of assets
- j. Money laundering
- k. Negligence of duty
- l. Nepotism
- m. Plunder
- n. Receiving a commission or bribe
- o. Solicitation of gifts
- p. Taking advantage of corporate opportunities
- q. Undue delay in rendition of service
- r. Undue influence
- s. Violation of procurement laws
- t. Sexual harassment

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- u. Illegal dismissal
- v. Retaliatory acts against whistleblowers


4.1.8.2 Whistleblowing Reports may also involve violations of the following laws:

- a. Republic Act No. 6713 or the "Code of Conduct and Ethical Standards for Public Officials and Employees"
- b. Republic Act No. 3019 or the "Anti-Graft and Corrupt Practices Act"
- c. Republic Act No. 7080 or the "Anti-Plunder Law"
- d. Title VII of Republic Act No. 3815 or the "Revised Penal Code"
- e. Executive Order No. 292, s. 1987 or the "Administrative Code of 1987"
- f. Republic Act No. 10149 or the "GOCC Governance Act of 2011"
- g. GCG Memorandum Circular No. 2012-05 or the "Fit and Proper Rule for Appointive Directors and CEOs of GOCCs"
- h. GCG Memorandum Circular No. 2012-06 or the "Ownership and Operations Manual Governing the GOCC Sector"
- i. GCG Memorandum Circular No. 2012-07 or the "Code of Corporate Governance for GOCCs"
- j. Other circulars, orders, authorizations, directives, and issuances of Governance Commission
- k. Executive Order No. 603, s. 1980, as amended
- l. Republic Act No. 112323 or the "Revised Corporation Code of the Philippines", as far as it applies to GOCCs in suppletory manner pursuant to Section 30 of Republic Act No. 10149
- m. Republic Act no. 11032 or the "Ease of Doing Business and Efficient Government Service Delivery Act of 2018"
- n. Republic Act No. 120009 or the "New Government Procurement Law"
- o. Republic Act No. 11966 or the "Public-Private Partnership (PPP) Code of the Philippines"
- p. Republic Act No. 7877 or the "Anti-Sexual Harassment Act of 1995"
- q. Republic Act No. 11313 or the "Safe Spaces Act"

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- r. CSC Resolution No. 2500357 or the "2025 Rules on Administrative Cases in the Civil Service", as revised, in case of chartered GOCCs and Governance Commission
- s. CSC Resolution No. 2500358 or the "Omnibus Rules on Appointment and Other Human Resource Actions", as revised in case of chartered GOCCs and Governance Commission
- t. Other laws, rules, and regulations applicable to government agencies as well as public officials and employees

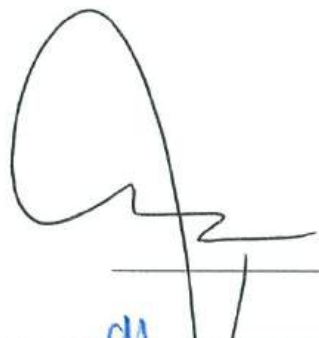
4.1.9 Reporting Channels

4.1.9.1 LRTA Internal Reporting Channels

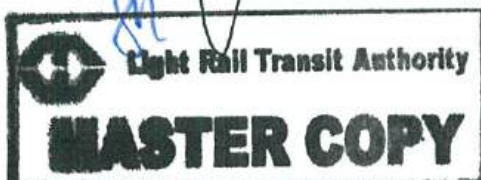
4.1.9.1.1 LRTA shall maintain confidential internal channels such as a dedicated electronic mail, secure online form, sealed drop boxes, and in-person filing with the Secretariat of the FFC that ensure secure receipt, docketing, and acknowledgment of Whistleblowing Reports. Whistleblowers may file reports through any of the following LRTA Internal Channels:


4.1.9.1.1.1 By sending an email to ffc@lta.gov.ph, provided that only the Chairperson, Vice-Chairperson, Members, and Secretariat shall have access to the mailbox of the said email address

4.1.9.1.1.2 By personally handing a printed, typewritten, or handwritten letter or other recorded communication to the Chairperson, Vice-Chairperson, Members, or Secretariat, provided that no other person shall have access to such letter or communication

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4.1.9.2 GCG Whistleblowing Portal

4.1.9.2.1 Whistleblowers may file a Whistleblower Report directly with the Governance Commission through their Online whistleblowing portal at <https://whistleblowing.gcg.gov.ph>. It shall serve as the primary channel for the submission of Whistleblowing Reports to the Governance Commission. The same may also be accessed through the LRTA website at <https://lrta.gov.ph>.

4.1.9.3 GCG Alternative Channels

Whistleblowers may also submit the Whistleblower Reports through the following alternative means:

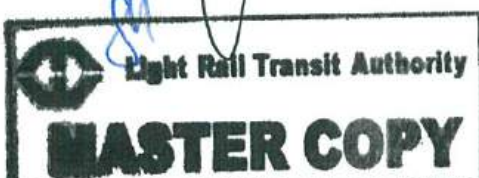
4.1.9.3.1 By sending an email to whistleblowing@gcg.gov.ph, provided that only the Chairperson, Commissioners, Executive Director, General Counsel, Integrity Division Chief, and persons authorized by the Chairperson, the Commission Proper, the Executive Director, the General Counsel, or the Integrity Division Chief shall have access to the mailbox of the said email address


4.1.9.3.2 By personally handing a printed, typewritten, or handwritten letter or other recorded communication to the Chairperson, the Commissioners, the Executive Director, the General Counsel, or the Integrity Division Chief, provided that no other person shall have access to such letter or communication unless authorized by the Chairperson, the Commission Proper, the Executive Director, the General Counsel, or the Integrity Division Chief

4.1.9.3.3 Through a face-to-face or online meeting with General Counsel, the Integrity Division Chief, or other persons

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authorized by the Chairperson, the Commission Proper, the Executive Director, the General Counsel, or the Integrity Division Chief, provided that the relevant matters reported or discussed during the meeting shall be reduced in writing or be recorded

4.1.9.3.4 By sending an email to integrity@gcg.gov.ph or by sending a printed, typewritten, or handwritten letter or other recorded communication to the office of the Governance Commission, noting that emails, letters, and other communications received through the said channels may be entered in the GCG Document Management System and, thus, do not enjoy the confidentiality offered by the GCG Whistleblowing Portal and other alternative reporting channels

4.1.9.4 Other Government Agencies/Offices

Whistleblowers are not precluded from submitting a report to another government office including, but not limited to, the following:

4.1.9.4.1 8888 Citizens' Complaint Center of the Office of the President through <https://8888.gov.ph>

4.1.9.4.2 Contact Center ng Bayan of the Civil Service Commission through <https://contactcenterngbayan.gov.ph>

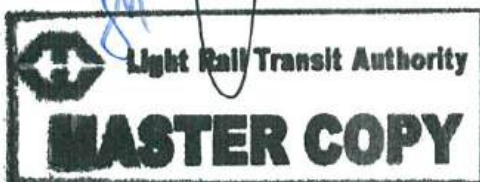
4.1.10 Procedure in Handling Whistleblowing Reports


4.1.10.1 Filing of Whistleblowing Report

At any time, Whistleblowers may file Whistleblowing Reports through designated channels mentioned in Item 4.1.9 hereof with its supporting documents. Vague or unsubstantiated reports may be dismissed without prejudice to re-filing.




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4.1.10.2 Anonymous Reporting

Anonymous Whistleblowing Reports shall be accepted provided that the same is sufficient in form as determined by the FFC. The Whistleblower may optionally provide non-identifying contact methods (i.e. anonymous email, prepaid mobile number, landline number) for follow-up without compromising anonymity.

4.1.10.3 Test of Sufficiency of Whistleblowing Report

A Whistleblowing Report, whether filed anonymously or otherwise, shall be considered sufficient in form when it contains the following:

4.1.10.3.1 Full name and position of the Reportable Person;

4.1.10.3.2 A clear and specific narration of the alleged violations, including relevant material facts such as the nature of the incident, the time and place of occurrence, the persons involved, supporting evidence, and other information necessary to reasonably establish the existence of a possible offense;

4.1.10.3.3 The corresponding laws, rules, and regulations allegedly violated; and


4.1.10.3.4 Any documents, records, or materials submitted in support of the allegations.

4.1.10.4 Preliminary Evaluation

All Whistleblowing Reports shall undergo a preliminary evaluation within a period not exceeding fifteen (15) calendar days to be conducted exclusively by the FFC for the purpose of determining whether the report

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is sufficient in form and in compliance with the minimum requirements prescribed under this Policy.

4.1.10.5 Action on the Whistleblowing Report

4.1.10.5.1 Referral of the Whistleblowing Report

If the FFC determines that the Whistleblowing Report is sufficient in form and satisfies the minimum requirements prescribed, it shall be forthwith refer the report to the proper committee and/or agency which has jurisdiction over the offense or matter complained of, including but not limited to the Committee on Decorum and Investigation of Sexual Harassment Cases (CODI), Administrative Disciplinary Committee (ADC), Grievance Committee, or any other appropriate body or office empowered to take cognizance of the case.

4.1.10.5.2 Dismissal of the Whistleblowing Report


If, however, the FFC finds the Whistleblowing Report to be insufficient, the same shall be dismissed outright, without prejudice to its refile provided that the Whistleblower may submit a new or amended Report that cures the deficiencies identified by the FFC.

The FFC may disregard Reports that are vague, ambiguous, patently without merit, or appear to be intended merely to harass the Reportable Person concerned.

The determination of the FFC hereunder shall be final for purposes of the preliminary evaluation and shall be duly recorded in the FFC's proceedings.

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4.1.10.6 Endorsement of the Whistleblowing Report

Having found the Whistleblowing Report to be sufficient in form and complies with the prescribed minimum requirements set forth under this Policy, the FFC shall undertake the appropriate action based on the nature of the possible offense, as follows:

4.1.10.6.1 For Administrative Disciplinary Matters

4.1.10.6.1.1 For those involving sexual harassment as defined under CSC Resolution No. 2100064, s. 2021, CSC Memorandum Circular No. 11, s. 2021, and the 2025 Rules on Administrative Cases in the Civil Service, the FFC shall endorse the Whistleblowing Report to the CODI for further proceedings.

4.1.10.6.1.2 For Whistleblowing Reports involving acts which constitutes violation of the provisions of the 2025 Rules on Administrative Cases in the Civil Service, but not falling under the preceding Item, the FFC shall endorse the same to the ADC for appropriate action.

4.1.10.6.1.3 For matters falling under Section 6 of CSC Memorandum Circular No. 02, s. 2021, but outside the ambit of the preceding Items, the same shall be endorsed to the Grievance Committee for further proceedings.




4.1.10.6.2 For Criminal Actions

When the facts preliminary gathered indicate the possible commission of a criminal offense included in Reportable

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Condition under Item 4.1.8 hereof, the FFC shall refer the matter to the Administrator, with copy furnished to the Legal Department, for the filing of appropriate criminal action with the proper courts, law-enforcement agencies, or other authorities vested with jurisdiction over such offense such as, but not limited to, the Office of the Ombudsman, National Bureau of Investigation, Philippine National Police, or appropriate judicial forum.

Such referral shall be without prejudice to the conduct of any parallel administrative proceedings arising from the same set of facts.

4.1.10.7 Protection of Whistleblowers

LRTA ensures full protection to all Whistleblowers who submit Reports in good faith. Retaliatory acts in any form shall be strictly prohibited and shall warrant appropriate administrative, civil, or criminal action in accordance with applicable laws, rules, and regulations.

Retaliation refers to adverse action, whether direct or indirect, taken against a Whistleblower as a consequence of, or in reprisal for, the filing of the Whistleblower Report or for participating in any related proceeding. Prohibited retaliatory acts include, but are not limited to:

- 4.1.10.7.1 Unjust or unauthorized dismissal, demotion, or suspension;
- 4.1.10.7.2 Discrimination or harassment in any form;
- 4.1.10.7.3 Unjust reduction in salary, benefits, or privileges;
- 4.1.10.7.4 Non-renewal or termination of contract without valid cause;
- 4.1.10.7.5 Negative or biased performance evaluation;
- 4.1.10.7.6 Threats, intimidation, or any act that adversely affects the rights or interests of the Whistleblower; and
- 4.1.10.7.7 Any other act or omission intended to discourage or punish whistleblowing.


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Upon receipt of a Whistleblowing Report alleging retaliation, LRTA shall promptly implement appropriate protective or mitigating measures, which may include, among others: temporary transfer or reassignment, modification of reporting lines, restricted contact orders, or any safeguard necessary to prevent further harm or intimidation.

Any Reportable Person found to have engaged in retaliatory acts shall be subject to disciplinary action, without prejudice to civil or criminal liabilities. LRTA shall likewise monitor for potential retaliation throughout the pendency and after the conclusion of the investigation to ensure continuous protection of the Whistleblower.

4.1.10.8 Monitoring of Whistleblowing Reports

The FFC shall maintain a comprehensive record of all Whistleblowing Reports, including those under preliminary evaluation endorsed to the ADC, CODI, Grievance Committee, or other relevant bodies, and their respective status and outcomes.

FFC shall prepare and submit quarterly progress reports on all whistleblowing cases to the LRTA Governance Committee (or the Board Committee designated for corporate governance and compliance matters). These reports shall include:

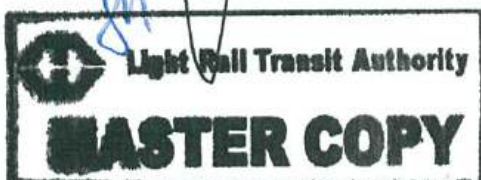
- 4.1.10.8.1 Number and nature of Whistleblowing Reports received;
- 4.1.10.8.2 Status of each case (i.e. under preliminary evaluation, endorsed, resolved, or closed);
- 4.1.10.8.3 Actions taken or recommended, including any disciplinary, administrative, or remedial measures;
- 4.1.10.8.4 Any instances of retaliation or protection measures implemented; and
- 4.1.10.8.5 Recommendations for policy enhancements or preventive actions to strengthen integrity within LRTA.


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The LRTA Governance Committee shall review these reports and escalate significant matters, summaries, or policy recommendations to the Board of Directors for appropriate oversight and decision-making. Reports shall be submitted within fifteen (15) working days after the end of each quarter, or more frequently as required by the LRTA Governance Committee, Board of Directors, or the GCG.

4.1.11 Untrue Allegations

4.1.11.1 Good-Faith Reports Protected

A Whistleblower who submits a Whistleblower Report in good faith, that is, with an honest belief, based on reasonably available facts, that a Reportable Condition may have occurred, shall not be penalized even if subsequent proceedings do not substantiate the allegation.

4.1.11.2 Bad-Faith or Malicious Filings

Submissions shall be deemed in bad faith when the Whistleblower knowingly makes false statements, willfully withholds material facts, or files a report with malicious intent, or with reckless disregard of whether the allegations are true or false. The following, among others, may indicate bad faith: fabrication or alteration of evidence; repeated filings of the same baseless accusations to harass a respondent; or knowingly accusing the wrong person.

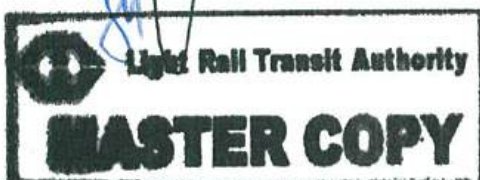
4.1.11.3 Consequences of Bad-Faith or Malicious Filings


Where bad faith is established after due process:

4.1.11.3.1 Directors, Officials, and Employees of LRTA may be held administratively liable under applicable civil service or internal disciplinary rules, without prejudice to civil or criminal proceedings as may be warranted by law.




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4.1.11.3.2 Non-employees may be subject to appropriate legal action (i.e. for damages or other remedies available under the law).

4.1.11.3.3 LRTA may disregard or dismiss the Whistleblowing Report and bar repetitive malicious refiling while still accepting any new filings that cures defects and presents good-faith, material information.

4.1.11.4 Procedural Safeguards

Prior to any adverse action based on bad faith, the Whistleblower shall be afforded notice of the grounds and a reasonable opportunity to explain and present evidence. Findings shall be written, indicate the factual bases, and be duly approved by the proper authority identified in this Policy.

4.1.11.5 Preservation of Parallel Proceedings

A determination that a Whistleblowing Report does not by itself constitute bad faith and shall not preclude the LRTA from pursuing any administrative, civil, or criminal action against the Reportable Person concerned if independent evidence warrants such action.

4.1.12 Confidentiality

4.1.12.1 FFC shall treat as strictly confidential the identity of the Whistleblower, the contents of the Whistleblowing Report, and all records generated in connection therewith. Access to such information shall be limited on a strict need-to-know basis for case intake, preliminary evaluation, fact-finding, or referral pursuant to this Policy.

4.1.12.2 Confidential information includes, but is not limited to: (1) the name and identifying details of the Whistleblower and witnesses; (2) the


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Whistleblower Report and attachments; (3) internal memoranda, minutes, notes, and correspondence; (4) evidence, working papers, and interim findings; and (5) recommendations and draft dispositions prior to issuance of a final action by the proper authority.

4.1.12.3 Permitted Disclosures

Disclosures of confidential information may be made only in the following instances, and must be the minimum necessary to achieve the stated purpose:

- 4.1.12.3.1 With the express written consent of the Whistleblower;
- 4.1.12.3.2 When required by law, regulation, or a lawful order of a court, quasi-judicial body; or competent authority;
- 4.1.12.3.3 When necessary for the institution of criminal or civil actions or referral to proper authorities as provided in this Policy; or
- 4.1.12.3.4 For inter-agency coordination with oversight bodies, i.e. GCG reporting or Ombudsman referrals, subject to equivalent confidentiality safeguards.


4.1.12.4 Handling and Security Measures

FFC Secretariat shall establish and enforce document control protocols, including docketing, secure storage (physical and electronic), role-based access, encryption for electronic submissions, and auditable logs of access and transmission. Copies and extracts shall be limited, numbered, and recalled when no longer necessary.

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4.1.12.5 Data Privacy

The collection, processing, retention, and disposal of personal data under this Policy shall comply with applicable data privacy requirements. Personal data shall be retained only for as long as necessary to fulfill the purposes of the evaluation or as required by government records-management standards, after which it shall be securely disposed of or archived in accordance with LRTA policies.

4.1.12.6 Breach of Confidentiality

Any LRTA Director, Official, or Employee who knowingly or negligently breaches confidentiality, attempts to obtain unauthorized access, or improperly discloses confidential information shall be subject to administrative disciplinary action, without prejudice to civil or criminal liabilities under applicable laws, rules, and regulations.

5.0 Other Details

5.1 Separability

If any of the provision, section, or part of this Policy is declared invalid, unconstitutional, or unenforceable by a court or authority of competent jurisdiction, such invalidity shall not affect the remaining provisions, which shall continue in full force and effect, provided that the fundamental intent of this Policy is not defeated or substantially impaired.


5.2 Non-Waiver

Failure of LRTA to strictly enforce any provision of this Policy at any time shall not be construed as a waiver of its right to enforce the same or any other provision thereafter. No act, omission, or grant of leniency shall constitute a precedent or create vested rights against future enforcement.




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5.3 Amendment and Revision

This Policy may be amended, revised, or supplemented as may be necessary to ensure continuous alignment with applicable laws, rules, and regulations, including issuances of the GCG, the Civil Service Commission, and other competent government authorities. Amendments shall take effect upon approval by the LRTA Board of Directors and compliance with applicable publication or posting requirements.

5.4 Suppletory Application of Laws and Rules

In matters not expressly provided in this Policy, the relevant provisions of existing laws, rules, regulations, and issuances, including, but not limited to, the 1987 Constitution, Republic Act No. 10149, the Revised Penal Code, the Administrative Code of 1987, 2025 Rules on Administrative Cases in the Civil Service, and GCG Memorandum Circular 2025-01, shall apply in a suppletory or supplementary manner.

5.5 Relationship with other LRTA Policies

This Policy shall be read in harmony with LRTA's internal policies. In case of conflict, the provision that affords greater protection to Whistleblowers, or that more effectively promotes transparency, accountability, and integrity, shall prevail.

5.6 Retention and Disposal of Records

All documents, files, reports, evidence, and records arising from Whistleblowing Reports shall be retained, preserved, or disposed of in accordance with LRTA records management policies, government archival regulations, and applicable data privacy laws. Confidentiality obligations shall survive the closure of any case or the separation of any personnel involved in its handling.


5.7 Effectivity

This Policy takes effect immediately upon approval by the LRTA Administrator and upon publication. LRTA shall ensure ongoing compliance and review as needed per GCG updates.

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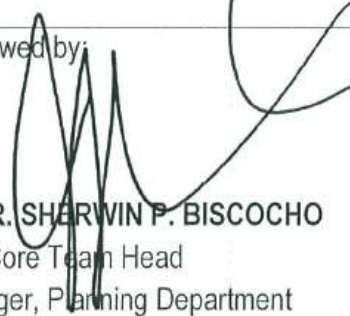

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The FFC may recommend to the LRTA Board of Directors the promulgation of relevant issuances, including the revision or amendment of this Policy.

5.8 References

- 5.8.1 GCG Memorandum Circular No. 2025-01 dated 13 January 2025
- 5.8.2 Code of Ethics and Business Conduct
- 5.8.3 Revised Manual on Corporate Governance
- 5.8.4 Republic Act NO. 10149
- 5.8.5 1987 Constitution
- 5.8.6 Other relevant laws, rules, and regulations

<p>Prepared by:</p> <div style="text-align: center; margin-top: 10px;">  LEO A. MANGAMPO Office-in-Charge, Administrative Department </div> <div style="text-align: center; margin-top: 20px;">  ENGR. LORELIE L. REYES Manager, Internal Audit Department </div> <div style="text-align: center; margin-top: 20px;">  ATTY. DON CHRISTIAN E. SANTIAGO Legal Researcher, Legal Department </div>	<p>Reviewed by:</p> <div style="text-align: center; margin-top: 10px;">  ENGR. SHERWIN P. BISCOCHO IMS Core Team Head Manager, Planning Department </div>	<p>Approved by:</p> <div style="text-align: center; margin-top: 10px;">  ATTY. HERNANDO T. CABRERA Administrator </div>
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