


POLICIES & PROCEDURES

Policy/Procedure Title S.C.A.R.F. REWARDS PROGRAM		Reference No. PP-SAS-032	Revision No. REV-001	Page No. 1 of 4
	Department/ Unit:	Safety and Security Department		
	Affects:	All employees of Travellers International Hotel Group, Inc. or any of its wholly-owned subsidiaries such as BrightLeisure Management Inc., and Grandventure Management Services Inc.		
		Date of Approval:	March 26, 2018	
		Date of Effectivity:	Immediately upon publication	
		Supersedes:	All other policies, or specific portions thereof, that are inconsistent with this policy	

1.0 PURPOSE/OBJECTIVE

- 1.1 This Policy aims to encourage participation and full cooperation from employees, on a confidential basis, in the detection and eventual resolution of Scams, Crimes, Abuses, Riggings and Fraud ("SCARF").
- 1.2 This Policy also aims to establish a program that protects the identity of, and extend rewards to, individuals who timely provide verifiable admissible evidence or information that leads to the detection and the eventual resolution of SCARF.

2.0 SCOPE

- 2.1 This Policy shall apply to any employee of Travellers International Hotel Group, Inc. or any of its wholly-owned subsidiaries such as BrightLeisure Management Inc., and Grandventure Management Services Inc. (hereinafter collectively referred to as the "Company"), who has verifiable personal knowledge of any SCARF incident that he or she will voluntarily and timely disclose to authorized Company representatives.
- 2.2 The procedures and reward system under this Policy may also apply to former employees, contractors or sub-contractors, suppliers, agency personnel, guests or patrons, and other stakeholders on a case to case basis, upon the recommendation of the Chief Security Officer and prior approval of the President/Chief Executive Officer and the Chief Operating Officer or Chief Financial Officer.

3.0 DEFINITION OF TERMS

- 3.1 **"Fraud"** is defined as the voluntary execution of a wrongful act, or a willful omission, knowing and intending the effects which naturally and necessarily arise from such act or omission. It refers to all kinds of deception, whether through insidious machination, manipulation, concealment or misrepresentation, that would lead an ordinarily prudent person into error after taking the circumstances into account. For purposes of this policy, the term "fraud" shall also encompass all multifarious means which human ingenuity can devise, and which are resorted to by one individual or group of individuals to secure an advantage over the Company by false suggestions or by suppression of truth and includes all surprise, trick, cunning, dissembling and any unfair way by which the Company is cheated.
- 3.2 **"Informant"** refers to a person who voluntarily and timely relays credible information involving illegal, irregular or anomalous activities to the Company based on verifiable personal knowledge that are not generally available to, or accessible by, the public or known to the Company. The identity of an informant shall remain to be anonymous and any data relevant to his or her identity shall be sealed and kept confidential, unless otherwise personally waived in writing by the informant.
- 3.3 **"Conspiracy"** is a private agreement or cooperation between two or more persons to commit an illegal, irregular or anomalous activity.
- 3.4 **"Scam"** is a fraudulent or deceptive act or operation.

POLICIES & PROCEDURES

Policy/Procedure Title

S.C.A.R.F. REWARDS PROGRAM

Reference No.

PP-SAS-032

Revision No.

REV-001

Page No.

2 of 4

- 3.5 **"Crime"** is an act or omission punishable under the Revised Penal Code or Special Penal Laws.
- 3.6 **"Abuse"** refers to improper usage of authority, access or information, as well as unjust or unfair treatment of an individual or entity, to obtain unwarranted gain or benefit to the damage and prejudice of the Company.
- 3.7 **"Rigging"** is an act of dishonesty that involves designing and installing an equipment to fraudulently obtain a particular result.
- 3.8 **"Committee/Composite Group"** shall consist of the Chief Operating Officer and the designated representatives from the Legal and Corporate Affairs Department, Safety and Security Department, Surveillance Department, and Human Resource Department. The Committee/Composite Group shall manage the processing of the Rewards Program for SCARF informants.
- 3.9 **"Reward"** is something of value, either monetary or non-monetary, given to the informant in return for verifiable information that led to a successful investigation, apprehension or recovery of money or property fraudulently or illegally obtained.

4.0 POLICY ADMINISTRATION

- 4.1 The proper implementation, administration and enforcement of this policy are hereby entrusted to the Safety and Security Department, through its Special Projects, Investigations & Research (SPIR) Unit, in close coordination with the Surveillance Department, Legal and Corporate Affairs Department, Human Resources Department, and/or Hotel and Gaming Operations Departments.

5.0 GENERAL POLICIES AND PROCEDURES

5.1 General Provisions

- 5.1.1. It is the policy of Resorts World Manila to continue protecting its operational integrity and to install appropriate mechanisms designed to prevent the commission of SCARF activities. The reporting and rewards program under this Policy are thus designed to encourage full cooperation from various stakeholders towards preventing SCARF incidents in the property, thereby creating a safer and more productive environment.
- 5.1.2. In implementing this policy, the Company shall exert reasonable efforts to:
- 5.1.2.1. Reinforce detection of crimes, internal theft, fraud or conspiracy.
 - 5.1.2.2. Encourage persons with personal knowledge of any illegal, irregular or anomalous activity to provide information to Resorts World Manila openly or anonymously.
 - 5.1.2.3. Minimize, if not totally eliminate, the risks of SCARF in the property.
 - 5.1.2.4. Maximize the scope of investigative options for a more comprehensive result.
 - 5.1.2.5. Institutionalize the program envisioned by the policy and the concomitant investigation and reward system.

5.2 Procedures

- 5.2.1. Appropriate notices shall be posted and disseminated by the Safety and Security Department or the Human Resources Department, as the case may be, to inform the employees of the availability of the Program contemplated by this policy.
- 5.2.2. The following are the communication methods to be utilized by informants:

POLICIES & PROCEDURES

Policy/Procedure Title

S.C.A.R.F. REWARDS PROGRAM

Reference No.

PP-SAS-032

Revision No.

REV-001

Page No.

3 of 4

- 5.2.2.1. RWM Tipster Hotline: 09178728261 / + 63 (2) 908-8222
- 5.2.2.2. In-person reporting
- 5.2.2.3. Dedicated e-mail address: whistleblower@rwmanila.com
- 5.2.2.4. Dedicated mail address (SPIR Office, 10F NECC Building, Newport Boulevard, Newport City, Pasay)
- 5.2.3. An informant may submit an anonymous tip anytime by phone, text message, e-mail, ordinary or registered mail or by personally talking to an authorized SPIR personnel. All information received will be treated with strict confidentiality.
- 5.2.4. An informant who voluntarily relays information on illegal, irregular or anomalous activities will be given a case number/code for subsequent inquiries and communication.
- 5.2.5. The SPIR Unit of the Safety and Security Department will be responsible for screening and assessing the:
 - 5.2.5.1. Veracity and timeliness of the information relayed by the informant;
 - 5.2.5.2. Source and credibility of the information.
 - 5.2.5.3. Additional information needed.
 - 5.2.5.4. Relevance and type of issue/s involved.
- 5.2.6. Legitimate claims or high-risk reports shall then be escalated, through an Evaluation Report, indicating the reported information/facts and the results of preliminary inquiry/verification, to the Committee/Composite Group, through the Chief Security Officer, for further assessment.
- 5.2.7. If the Chief Security Officer recommends further action on the matter, the SPIR Unit shall act/investigate accordingly and prepare a full report of the results thereof together with the recommended courses of action. This full report shall be submitted to the Committee/Composite Group, through the Chief Security Officer.
- 5.2.8. The SPIR Unit shall be in charge of records/Information management and maintain a record of:
 - 5.2.8.1. The report date
 - 5.2.8.2. The source, if provided
 - 5.2.8.3. If anonymity is desired or waived
 - 5.2.8.4. Contact information, if provided
 - 5.2.8.5. Details of the allegation, including the suspect(s) involved
 - 5.2.8.6. Any additional information provided, such as the location of evidence
 - 5.2.8.7. Recommended action based on the initial assessment of the report
- 5.2.9. Existing employees and those who will henceforth be hired will be oriented and informed of the salient provisions of the SCARF Program under this policy.
- 5.2.10. Intentional submission of false, frivolous or misleading reports may result to the institution of appropriate administrative proceeding against the erring employee in accordance with the Company's Code of Conduct. This is without prejudice to appropriate legal actions that may be taken by the Company in accordance with applicable laws.

POLICIES & PROCEDURES

Policy/Procedure Title

S.C.A.R.F. REWARDS PROGRAM

Reference No.

PP-SAS-032

Revision No.

REV-001

Page No.

4 of 4

5.2.11. An informant may be given a reward/s, either monetary or non-monetary, upon the recommendation of the Chief Security Officer and express approval of the simple majority (50%+1) of the members of the Committee/Composite Group.

5.2.12. All of the following conditions must be present before an informant may be deemed eligible by the Committee/Composite Group to receive a reward, to wit:

5.2.12.1. There is no other direct evidence available to the Company in relation to the illegal, irregular or anomalous acts reported, except the information based on verifiable personal knowledge of the informant.

5.2.12.2. The information relayed by the informant can be substantially corroborated in its material points;

5.2.12.3. The informant does not appear to be the most guilty;

5.2.12.4. The informant has not misrepresented or concealed any fact to the Company in relation to the illegal, irregular or anomalous acts reported; and

5.2.12.5. If the informant is an employee, the disclosure of information should not be part of his or her normal duties and responsibilities.

5.2.13. Upon determination of the existence of all of the conditions set forth in the immediately preceding paragraph, the SPIR Unit will prepare a summary of the investigation report and suggest a reward/s that will be extended to the informant, for the approval of the Committee/Composite Group in accordance with Paragraph 5.2.11 hereof.

6.0 VIOLATION OF POLICY

6.1 Violation of any provision hereof shall result to the institution of administrative proceedings under Section 1.4.6 of the Company's Code of Conduct on *insubordination and deliberate refusal to abide by lawful orders and policies of Resorts World Manila*, among others.

7.0 REVISIONS/AMENDMENTS

7.1 This Policy supersedes any existing policy, agreement, prior communication and/or instructions on matters covered herein, insofar as they may be inconsistent herewith, that may have been issued or discussed prior to the effectivity hereof.

7.2 Exceptions to the strict application of the terms of this Policy shall be of legal effect only upon the written approval of the President and any of the Company's Chief Operating Officer and Chief Financial Officer.

7.3 No person shall earn any vested right over any reward that may be granted under the policy. The Company retains the sole and exclusive right to discontinue or cancel the reward program herein, which, for all intents and purposes, shall not constitute diminution of benefits.

7.4 The Company reserves the right to modify, alter, amend, add and/or delete any provision of this Policy.

7.5 This Policy shall be effective immediately upon publication.

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