

# SECURITIES AND EXCHANGE COMMISSION

## SEC FORM 17-C

### CURRENT REPORT UNDER SECTION 17 OF THE SECURITIES REGULATION CODE AND SRC RULE 17.2(c) THEREUNDER

1. Date of Report (Date of earliest event reported)  
Jan 17, 2017
2. SEC Identification Number  
PW538
3. BIR Tax Identification No.  
000-225-442
4. Exact name of issuer as specified in its charter  
FAR EASTERN UNIVERSITY, INC.
5. Province, country or other jurisdiction of incorporation  
Philippines
6. Industry Classification Code(SEC Use Only)

7. Address of principal office  
Nicanor Reyes Street, Sampaloc, Manila  
Postal Code  
1015
8. Issuer's telephone number, including area code  
(632) 735-8686
9. Former name or former address, if changed since last report  
-

10. Securities registered pursuant to Sections 8 and 12 of the SRC or Sections 4 and 8 of the RSA

| Title of Each Class | Number of Shares of Common Stock Outstanding and Amount of Debt Outstanding |
|---------------------|---|
| COMMON              | 16,477,023  |

11. Indicate the item numbers reported herein  
1

*The Exchange does not warrant and holds no responsibility for the veracity of the facts and representations contained in all corporate disclosures, including financial reports. All data contained herein are prepared and submitted by the disclosing party to the Exchange, and are disseminated solely for purposes of information. Any questions on the data contained herein should be addressed directly to the Corporate Information Officer of the disclosing party.*





# Far Eastern University, Incorporated

## FEU

**PSE Disclosure Form 4-30 - Material Information/Transactions**  
*References: SRC Rule 17 (SEC Form 17-C) and  
Sections 4.1 and 4.4 of the Revised Disclosure Rules*

### Subject of the Disclosure

Approval of Policy on Whistle Blowing

### Background/Description of the Disclosure

The Board of Trustees of Far Eastern University, Inc. at its meeting held on 17 January 2017 approved the attached policy on Whistle Blowing.

### Other Relevant Information

-

### Filed on behalf by:

|                    |                          |
|--------------------|--------------------------|
| <b>Name</b>        | MA. CRISTINA TALAMPAS    |
| <b>Designation</b> | ADMINISTRATIVE ASSISTANT |



# FAR EASTERN UNIVERSITY

17 January 2017

Disclosure Department  
The Philippine Stock Exchange, Inc.  
Tower One and Exchange Plaza  
Ayala Triangle, Ayala Avenue  
Makati City

Attn.: Mr. Jose Valeriano B. Zuño III  
OIC – Head

Gentlemen:

Please be informed that the Board of Trustees at its meeting held today, 17 January 2017 approved the attached policy on Whistle Blowing.

Very truly yours,

FAR EASTERN UNIVERSITY

  
ANGELINA P. JOSE  
Corporate Secretary



Nicanor Reyes Street  
Sampaloc, Manila  
P.O. Box 609 Philippines 1015  
[www.feueu.edu.ph](http://www.feueu.edu.ph)



# FAR EASTERN UNIVERSITY

## Policy on Whistle Blowing

### I. POLICY STATEMENT

Far Eastern University is committed to give adequate protection to its employees from interference and retaliation when making protected disclosures or “whistleblowing,” which includes disclosing information related to a violation of law, rule, or regulation; gross mismanagement; gross waste of funds; abuse of authority; or a substantial and specific danger to health or safety.

In line with this, the university provides everyone the opportunity to raise valid concerns that directly affect the company.

Whistle blowers who come forward are expected to be fully aware of possible abuse of this privilege; irresponsible and indiscriminate accusations shall be meted the appropriate sanctions.

### II. OBJECTIVE

The purpose of this policy is to encourage individuals to disclose wrongful conduct engaged in by others to the appropriate official so that prompt corrective action may be taken.

### III. DEFINITION OF TERMS

ACTING IN GOOD FAITH  
WITH HONESTY AND  
INTEGRITY

- Anyone making a “protected disclosure” or filing a complaint concerning a violation or suspected violation of this policy must be acting sincerely and believe the information disclosed indicates a true violation of good conduct.

EMPLOYEES

- Officers, Managers, and Academic and Non-Academic Staff of FEU and all affiliated schools.

AUTHORITY

- Any officer of or person connected with FEU who occupies a position of sufficient influence to make independent and objective decisions.

COMPETENT  
AUTHORITY

- Any individual, group, or agency with the relevant influence or power to take action in response to actual or suspected wrongful conduct, including but not limited to the Police, Government, judicial, or regulatory bodies.

DISCIPLINARY  
MEASURES

- Any action considered by the relevant authority as helping to prevent unacceptable behavior or to improve performance.

PROTECTED  
DISCLOSURES

- Any statement or communication made pursuant to this policy, under which circumstances the reporter will be treated with confidentiality and protected from any adverse impacts related to any investigation and/or outcomes of such.



## Policy on Whistle Blowing

- RETALIATION - Any adverse action or reaction against an individual because he or she has made a “protected disclosure” or has participated in an investigation, proceeding, or hearing involving a “protected disclosure.”
- WHISTLE BLOWER - Any employee, faculty, manager, outside service providers, or clients who make a “protected disclosure.”
- WHISTLE BLOWING - The “Protected Disclosure” of information made in “good faith,” which relates to actual or suspected wrongful conduct engaged in by FEU employees, faculty members, or service providers and their employees assigned to FEU or clients. This may include but is not limited to:
- Criminal activity;
  - Miscarriage of justice;
  - Danger to health and safety;
  - Damage to the environment;
  - Breach of FEU policy or procedures;
  - Violation of applicable local laws;
  - Failure to comply with any legal or professional obligation;
  - Failure to comply with regulatory requirements resulting in a breach;
  - Financial fraud or mismanagement, or act of malfeasance;
  - Negligence;
  - Conduct likely to damage the University’s reputation;
  - Unauthorized disclosure of confidential information;
  - Bullying, harassment, or acting in an aggressive manner;
  - Any personal conduct which is inappropriate or unbecoming; is contrary to the FEU Code Business Conduct and Ethics; and/or would be reasonably expected to cause fear or significant offence; and
  - The deliberate concealment of any of the above matters.

#### IV. COVERAGE OR SCOPE

1. This policy is applicable to all Far Eastern University employees, faculty, and service providers and their employees assigned to FEU, and clients.
2. This policy applies in all jurisdictions where FEU has a campus or operations, provided that its application is not contrary to local laws or regulations.



## Policy on Whistle Blowing

### V. RESPONSIBILITIES

- EMPLOYEES / FACULTY* - To practice honesty, transparency, and integrity in fulfilling duties and responsibilities, and to comply with all University policies, rules, regulations, and local laws and regulations. FEU encourages all employees, “acting in good faith,” to report suspected or actual wrongful conduct.
- OFFICERS / MANAGERS* - Not to directly or indirectly use or attempt to use the official authority or influence of their positions or offices for the purpose of interfering with the right of an individual to make a “protected disclosure” to the appropriate University official about matters within the scope of this policy.
- COMPLIANCE OFFICER* - Responsible for initiating any investigation and recommend actions to be taken.  
- Coordinates with the Human Resources Division on violations committed by FEU Managers and employees.

### VI. GUIDELINES

1. All trustees, employees, clients, and service providers and their employees assigned to FEU are encouraged to report any actual fraudulent or dishonest acts in the University done by employees, faculty, or clients to the “authority” designated under this policy.
2. It is important that individuals disclose information in accordance with this Policy at the earliest opportunity.
3. In a case where a trustee is involved, the report shall be addressed to the Corporate Governance Committee.
4. In a case where a manager or an employee is involved, the report shall be addressed to the President through the Vice President of Human Resources Development and the Compliance Officer.
5. Any report that proves to have been unsubstantiated, made with knowledge of its falsity, and in bad faith is not protected by this policy and shall be dealt with accordingly.

#### 6. Whistle Blower Protection

- 6.1. “Whistle Blower” reports will be handled with sensitivity, discretion, and confidentiality.
- 6.2. FEU will protect “Whistle Blowers” against retaliation.



## Policy on Whistle Blowing

- 6.3. Any employee who believes he or she may be subject to retaliation may raise such concern to the Human Resources Division and Compliance Officer.
- 6.4. Any complaint of retaliation, including but not limited to threats of physical harm, loss of job, punitive work assignments, or reduced salary or wages, will be promptly investigated.
- 6.5. Any form of retaliation undertaken by an employee against any person for reporting an irregularity is prohibited and considered a breach of the FEU's Code of Business Conduct and Ethics.
- 6.6. Where such cases are substantiated, disciplinary measures will be taken accordingly.

### 7. False Allegations

Any employee or manager who, with reckless disregard for the truth or in bad faith, knowingly gives false information or makes a malicious report of wrongful conduct may, after due process, be subject to disciplinary action, which may include termination.

### 8. How to Report

- 8.1. The "Whistle Blower" shall report any reasonable concern about (a) wrongful conduct, including aggressive, offensive, or otherwise inappropriate behavior, or (b) fraudulent or dishonest use or misuse of university resources/property, to the:
  - 8.1.1. Immediate Superior;
  - 8.1.2. Human Resources Division; or
  - 8.1.3. Compliance Officer:
- 8.2. Reporting may be done in writing using the Whistle Blowing Disclosure Report Template (Annex A) properly signed and
  - 8.2.1. mailed to a designated authority or
  - 8.2.2. emailed to the designated Whistleblower address (whistleblower@feu.edu.com);
- 8.3. Reports should contain enough information to substantiate the concern and allow an appropriate investigation to begin.
- 8.4. Reports may be made directly to Corporate Governance Committee if the individual is concerned about making a disclosure about his/her own division or department or if any of the following is noted:
  - 8.4.1. Conflict of interest;
  - 8.4.2. Risk of retaliation;
  - 8.4.3. The intended recipient is personally implicated; or
  - 8.4.4. The authority initially alerted fails to take appropriate action.
- 8.5. Confidentiality



## Policy on Whistle Blowing

- 8.5.1. “Protected disclosures” may be made anonymously by the complainant and are strictly treated as confidential.
- 8.5.2. “Protected disclosures” and investigation records will be kept confidential to the extent possible, consistent with the need to (a) conduct an adequate investigation, (b) report results to the authorities as may be required by law or regulatory requirements, (c) take necessary corrective actions; or (d) implement protective measures.

### **9. Management Information**

- 9.1. A record of all disclosures or incidents and any subsequent actions taken will be made by the Compliance Officer in accordance with the record retention policy of FEU.
- 9.2. In all cases, a report of the outcomes of any investigation will be made to the Corporate Governance Committee by the Compliance Officer – in detail where the issue falls within its purview and in summary in other cases – as a means of allowing the Committee to monitor the effectiveness of the procedure.

### **10. Dissemination of the Policy**

The Human Resource Division (HRD) shall be responsible for the dissemination of the policy. Where necessary, HRD will arrange the training of those involved in the implementation of the policy.

## **VII. ADMINISTRATION**

1. Administration of this policy shall be made by the Compliance Officer and the respective division/department heads.
2. This policy and any evidence pertaining to its effectiveness shall be reviewed and updated by the Corporate Governance Committee at intervals of no longer than three years or as the need arises.
3. The Board of Trustees may propose any necessary amendments or updates to this policy.

## **VIII. ANNEXES**

Annex A – Whistle Blowing Disclosure Report