

ACGR

WHISTLE-BLOWING POLICY

NOW Corporation is committed to high standards of ethical, moral and legal business conduct. In line with this commitment, this policy aims to provide an avenue for company personnel to raise concerns and as reassurance that they will be protected from reprisals or victimization for whistleblowing.

This whistleblowing policy is intended to cover protections if concerns are raised regarding the company, including:

1. incorrect financial reporting;
2. unlawful activity;
3. activities that are not in line with company policy, including the Code of Business Conduct;
or
4. activities which otherwise amount to serious improper conduct.

The following safeguards are instituted to effectively implement this policy:

1. Harassment or victimization of complainants is not tolerated.
2. The company will not retaliate against a complainant, such as termination of contract or threats of physical harm. However, this protection from retaliation does not include immunity from any personal wrongdoing that is alleged and investigated.
3. Every effort will be made keep the complainant's identity confidential, unless disclosure is required by law or any legal process.
4. This policy encourages company personnel to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will be explored appropriately, but consideration will be given to:
 - a) The seriousness of the issue raised;
 - b) The credibility of the concern; and
 - c) The likelihood of confirming the allegation from attributable sources.
5. Allegations in bad faith will result in disciplinary action.

Procedure



Reporting

The whistleblowing procedure is intended to be used for serious and sensitive issues. Such concerns, including those relating to financial reporting, unethical or illegal conduct, may be reported directly to Atty. Angeline L. Macaset at 750-0211.

Employment-related concerns should continue to be reported through your normal channels such as the HR Head or to the President and CEO.

Please note that the earlier a concern is expressed, the easier it is to take action.

Investigation

The action taken by NOW Corporation in response to a report of concern under this policy will depend on the nature of the concern. The Audit Committee of NOW Corporation's Board of Directors shall receive information on each report of concern and follow-up information on actions taken.

- Evidence - Although the company personnel is not expected to prove the truth of an allegation, he or she should be able to demonstrate to the person contacted that the report is being made in good faith.
- Initial Inquiries - Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take.
- Further Information -The amount of contact between the complainant and the person or persons investigating the concern will depend on the nature of the issue and the clarity of information provided. Further information may be sought from or provided to the person reporting the concern.

Action