



Business Gifts and Gratuities Policy

1. COVERAGE

This Business Gifts and Gratuities Policy (“Policy”) applies to all directors, officers, and employees of AREIT, Inc. (“AREIT” or the “Company”).

2. STATEMENT OF POLICY

AREIT recognizes the Filipino culture of giving and accepting gifts as part of its way to express gratitude to other persons. However, the value of such gift should be within reasonable limits of propriety.

Gifts offered to a director, officer, or employee by clients, suppliers, and the like due to their position in the Company should be received in the name of the Company duly acknowledged with gratitude.

3. POLICY PROVISIONS

In connection with a director, officer, or employee’s affiliation or position in AREIT, he or she may receive gifts or invitations to luncheons or dinners from clients or suppliers.

3.1 In general, AREIT directors, officers or employees may accept a gift or an invitation if:

- It is unsolicited;
- It does not violate any laws;
- It does not discredit AREIT;
- It is directly attributable to personal or familial relationships;
- It is a promotional item or token of nominal value made available under the client’s or supplier’s customer or public relations program;
- It is part of business meetings or discussions (e.g. invitations to lunch or dinner by Company clients or suppliers)
- It is not given to influence judgment.

3.2 The gift should be inexpensive. In monetary terms, the value of such a gift should not be more than reasonable limits of propriety. The amount of substantial value shall be defined by Management and reviewed periodically. Such substantial value shall be applicable once per giver per year.

Otherwise, if the gift is more than the defined reasonable limits of propriety, and meets all the conditions stated above, then the director, officer, employee should accept it with gratitude on behalf of the Company and turn it over to Management for proper disposition.

3.3 Directors, officers, or employees are not allowed on any occasion to receive cash or gift certificates from business partners.

3.4 Under no circumstances should directors, officers, or employees accept, directly or indirectly, payments, loans, kickbacks, special privileges, favors, or services from anyone.

3.5 It is unacceptable and contrary to AREIT’s practices to offer money, favors, inappropriate gifts or promises of gifts, or anything else of unusual value to influence direct, obtain or retain business in AREIT’s favor. Such payments or favors may be considered bribery which violates Company policy as well as existing laws. It is equally unacceptable for any director, officer, or employee to take bribes in any form.



4. ADMINISTRATION

All directors, officers, and employees with responsibilities for transacting business with other firms and customers are responsible for the strict observance of this Policy.

8. EFFECTIVITY

This Business Gifts and Gratuities Policy, approved by the Board of Directors on the 24th of February 2023 shall be effective immediately.

JOSE EMMANUEL H. JALANDONI
Chairman

MA. TERESA R. FAMY
Chief Compliance Officer



ANNEX A

CHART OF OFFENSES

OFFENSE	PENALTIES				
	1 st Offense	2 nd Offense	3 rd Offense	4 th Offense	5 th Offense
1. Offenses against company property / property of others					
1.1 Deliberately damaging or attempting to damage Company property	DISMISSAL				
1.2 Deliberately damaging or attempting to damage property of Company officer or co-employees within Company premises	10 DAYS SUSPENSION	DISMISSAL			
1.3 Unauthorized use of Company materials, tools, machinery, equipment, or vehicles for personal profit, gain, or use	WRITTEN WARNING	10 DAYS SUSPENSION	DISMISSAL		
1.4 Robbery, theft or pilferage or its attempt in any form from the Company or from others within company premises	DISMISSAL	(without prejudice of filing criminal complaint)			
1.5 Having in one's possession any Company property not duly assigned to him. Any employee caught with Company property in his/her possession not duly assigned to him/her shall be presumed guilty under this violation unless such possession is sufficiently explained.	WRITTEN WARNING	10 DAYS SUSPENSION	DISMISSAL		
1.6 Improper or incorrect use or handling of Company materials, tools, machinery, equipment, or vehicles for personal profit, gain, or use.	WRITTEN WARNING	10 DAYS SUSPENSION	DISMISSAL		
1.7 Failure of employee/user to immediately report any damage or defect of Company equipment, machine, etc.	2 DAYS SUSPENSION	10 DAYS SUSPENSION	DISMISSAL		
1.8 Removing, altering or defacing company notices on company announcement channels or Company property and other similar acts of vandalism to Company property.	WRITTEN WARNING	5 DAYS SUSPENSION	10 DAYS SUSPENSION OR DISMISSAL		
1.9 Failure to report loss of Company property	WRITTEN WARNING	5 DAYS SUSPENSION	10 DAYS SUSPENSION OR DISMISSAL		

*1.8 and 1.9 depends on gravity of the offense.



OFFENSE	PENALTIES				
	1 st Offense	2 nd Offense	3 rd Offense	4 th Offense	5 th Offense
2. Offenses against persons					
2.1 Inflicting or attempting to inflict harm or injury to fellow employees for any reason except unprovoked assault	30 DAY SUSPENSION OR DISMISSAL	Depending on gravity the offense			
2.2 Threatening, intimidating, coercing or harassing fellow employees	15 DAYS SUSPENSION	30 DAYS SUSPENSION	DISMISSAL		
2.3 Provoking or instigating a fight or fighting inside the Company premise	15 DAYS SUSPENSION	30 DAYS SUSPENSION	DISMISSAL		
2.4 Making vicious, offensive, malicious, or disrespectful statements against co-employee	10 DAYS SUSPENSION	30 DAYS SUSPENSION	DISMISSAL		
2.5 Insulting or willful disrespect on the honor of a supervisor or manager or improper conduct and acts of disrespect to visitors/guests	15 DAYS SUSPENSION	30 DAYS SUSPENSION	DISMISSAL		
2.6 Making offensive statements or actions that constitute sexual harassment	DISMISSAL				

OFFENSE	PENALTIES				
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3. Offenses against company interest					
3.1 Soliciting or accepting any favor, money, gifts or anything of value from anyone to perform an act prejudicial to the Company or as a condition for the performance of one's duty or if such favor might influence the employee's impartiality in performing his job	DISMISSAL				
3.2 Misappropriation of company funds regardless of amount	DISMISSAL				
3.3 Unauthorized disclosure of Company's classified information, trade secrets, or permitting or assisting any person to access to such confidential information	DISMISSAL				
3.4 Engaging, participating or involving one's self in any transaction, undertaking or business enterprise where such engagement, participation or involvement is in conflict with or	DISMISSAL				



	improper or prejudicial to the interest of the company				
3.5	Soliciting or collecting contributions, money or material objects, for any purpose not sanctioned by the Company or selling anything within Company premises	WRITTEN WARNING	5 DAYS SUSPENSION	10 DAYS SUSPENSION OR DISMISSAL	
3.6	Failure to wear the prescribed dress code	ORAL REPRIMAND	WRITTEN WARNING	5 DAYS SUSPENSION	10 DAYS SUSPENSION

OFFENSE	PENALTIES				
	1 st Offense	2 nd Offense	3 rd Offense	4 th Offense	5 th Offense
4. Work Related Offenses					
4.1	Gross negligence in the performance of duties and responsibilities resulting to serious losses or disruption of operations	10 or 20 DAYS SUSPENSION OR DISMISSAL	Depending on gravity the offense		
4.2	Failure to work overtime after signing the overtime authorization form without valid justification	2 DAYS SUSPENSION	5 DAYS SUSPENSION	10 DAYS SUSPENSION OR DISMISSAL	
4.3	Willful disobedience or refusal without valid, justified reason to comply with or obey official, lawful order to carry out assigned duties or works	5 DAYS SUSPENSION	15 DAYS SUSPENSION	DISMISSAL	
4.4	Failure to comply with standard operating procedure and established practices	WRITTEN WARNING	2 DAYS SUSPENSION	5 DAYS SUSPENSION	10 DAYS SUSPENSION
4.5	Leaving work assignment or Company premises during working hours without permission or approval of immediate supervisor	WRITTEN WARNING	5 DAYS SUSPENSION	10 DAYS SUSPENSION OR DISMISSAL	
4.6	Sleeping during work hours.	WRITTEN WARNING	3 DAYS SUSPENSION	5 DAYS SUSPENSION	10 DAYS SUSPENSION
4.7	Deliberately slowing down, hindering or limiting work output.	5 DAYS SUSPENSION	10 DAYS SUSPENSION	20 DAYS SUSPENSION	DISMISSAL
4.8	Absence without official leave	5 DAYS SUSPENSION	15 DAYS SUSPENSION	DISMISSAL	
4.9	Habitual tardiness (i.e. 6 times tardiness within a month).	ORAL REPRIMAND	WRITTEN WARNING	5 DAYS SUSPENSION	10 DAYS SUSPENSION
4.10	Abuse of breaktime in excess of authorized break period.	ORAL REPRIMAND	WRITTEN WARNING	5 DAYS SUSPENSION	10 DAYS SUSPENSION

OFFENSE	PENALTIES				
	1 st Offense	2 nd Offense	3 rd Offense	4 th Offense	5 th Offense
5. Offenses Against Public Morals					



5.1	Immoral conduct or indecency or any scandalous act inside Company premises	WRITTEN WARNING	15 DAYS SUSPENSION	DISMISSAL		
5.2	Engaging in malicious gossip or rumor-mongering	WRITTEN WARNING	15 DAYS SUSPENSION	DISMISSAL		
5.3	Reporting for work or loitering inside Company premises under the influence of liquor, or intoxicating drinks and/or drugs	7 DAYS SUSPENSION	15 DAYS SUSPENSION	DISMISSAL		
5.4	Bringing or attempting to bring into Company premises alcoholic beverages, except if the purpose is for Company authorized occasions	WRITTEN WARNING	10 DAYS SUSPENSION	DISMISSAL		
5.5	Drinking alcoholic beverages during working time and/or inside Company premises, except on Company authorized occasions	15 DAYS SUSPENSION	DISMISSAL			
5.6	Possessing, using or causing to be used narcotics or prohibited drugs inside Company premises	DISMISSAL				
5.7	Gambling in any form, promoting or assisting gambling operators, betting, lottery or any game of chance within Company premises.	7 DAYS SUSPENSION	15 DAYS SUSPENSION	DISMISSAL		
5.8	Engaging or playing any game of skill within Company premises and during working hours, except during Company authorized employee engagement activities	WRITTEN WARNING	2 DAYS SUSPENSION	10 DAYS SUSPENSION OR DISMISSAL		
5.9	Engaging in disorderly conduct (i.e. horseplaying, scuffling, shouting or throwing of things) and making insulting jokes or pranks to co-employees or supervisors	WRITTEN WARNING	5 DAYS SUSPENSION	DISMISSAL		

OFFENSE	PENALTIES					
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6. Violations Against Health / Safety / Security Regulations						
6.1	Assisting any non-employee to enter the Company premises without due permission from his superior / unit head (i.e. lending of company ID for use or benefit of another)	5 DAYS SUSPENSION	10 DAYS SUSPENSION	DISMISSAL		
6.2	Unauthorized possession or carrying of deadly weapons, explosives inside Company premises	DISMISSAL				
6.3	Unauthorized entry to any restricted areas so designed by the Company	WRITTEN WARNING	5 DAYS SUSPENSION	DISMISSAL		



6.4	Not wearing Company ID while inside Company premises	WRITTEN WARNING	5 DAYS SUSPENSION	10 DAYS SUSPENSION OR DISMISSAL		
6.5	Acts creating or contributing to unsanitary conditions	WRITTEN WARNING	5 DAYS SUSPENSION	10 DAYS SUSPENSION OR DISMISSAL		
6.6	Refusal to cooperate with security personnel in the performance of their duties	WRITTEN WARNING	5 DAYS SUSPENSION	10 DAYS SUSPENSION OR DISMISSAL		
6.7	Failure or refusal to comply with medical requirements and health and safety protocols	WRITTEN WARNING	5 DAYS SUSPENSION	10 DAYS SUSPENSION OR DISMISSAL		