



# Code of Conduct

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## 1. **COVERAGE**

All employees, including but not limited to those who are regular, probationary, project hire, consultant, and intern.

## 2. **STATEMENT OF POLICY**

All employees are expected to observe and maintain acceptable office conduct for the orderly operation of the Company as well as for the protection of rights, safety, and benefits of the total employee force.

A “firm but fair” approach in the implementation of all company rules and regulations will consistently be pursued and observed by all those accountable for its implementation.

## 3. **POLICY PROVISIONS**

This Code of Conduct, as summarized in Annex A (Chart of Offenses), provides the rules and regulations which have been promulgated to:

3.1 Instill awareness on the part of the personnel regarding proper behavior and conduct in their jobs and their relationships with the Company and their colleagues and co-workers.

3.2 Create and maintain an orderly and pleasant atmosphere conducive to working together efficiently.

3.3 Guide employees to perform duties with integrity regardless of work designation, location, or schedule.

3.4 Serve as guidelines in handling disciplinary cases to ensure fair, consistent, and uniform imposition of disciplinary actions.

## 4. **ADMINISTRATION**

### 4.1 Procedures

4.1.1 The immediate manager is responsible for reporting to Human Resources Department any offense/s committed by any member of his/her designated staff. The Human Resources Department (the “HRD”) shall then assess and evaluate the case referred to determine if the factual circumstances as reported warrants further investigation.

4.1.2 If the alleged offense of the employee constitutes a violation of the Company rules and regulations, the HRD shall advise the Group Head of the employee subject of the charge to issue a Notice to Explain indicating the nature of the charge/s and the applicable Company regulation alleged to have been violated, and require the employee charged to have committed a violation to explain his/her side or defend himself/herself in writing within the period prescribed in the Memorandum. An email explanation from the employee is acceptable. Failure or refusal of the personnel to comply and submit a written explanation within the period prescribed shall operate as a waiver of his/her right to be heard or to present evidence (in compliance with minimum requirement per Labor Code).



- 4.1.3 Upon receipt of the employee's Explanation, the HRD shall facilitate and conduct the investigation for a period not exceeding 7 working days. Should the offense merit a preventive suspension, HR must immediately notify the employee and issue the suspension conditions.
- 4.1.4 The erring personnel shall be given opportunity to answer the allegations against him/her, to meet any or all the witness, and to present any and all evidence that may strengthen his/her defense. During the administrative investigation proceeding, the personnel may avail of the assistance of any representative of choice to defend himself/herself, if he/she so desires.
- 4.1.5 The Human Resources Department shall document the proceedings and shall form part of the record of the case. Examples of documented proceedings are formal complaint, notice to explain (NTE), response to NTE, investigation process and supporting evidence, administrative hearing (if any), result/decision of committee. After having ascertained all the relevant facts of the case and evaluated the evidences presented, the Committee (comprised of immediate manager, Employee Relations/HR Head (HR), Legal Counsel and Audit Head/CFO) will submit its report and/ or recommendations to Management.
- 4.1.7 Upon approval of the report/recommendation, HRD shall prepare a Disciplinary Action Memo. Signatories of disciplinary action memos are specified below:
  - 4.1.7.1 Warnings – Employee Relations Manager or Immediate Supervisor
  - 4.1.7.2 Suspension for a fixed period - HR Head
  - 4.1.7.3 Preventive Suspension/Termination – Group Head, HR Head
- 4.1.8 All cases involving pilferage of Company property shall be under the jurisdiction of the Employee Relations or Human Resources Manager in close coordination with security and erring employee's Group Head. The employee concerned may be placed under preventive suspension if warranted by the circumstances and if his/her continuous presence poses as serious and imminent threat to the life and property of the Company or his co-workers.
  - 4.1.8.1 Upon service of the Notice of Preventive Suspension or suspension notices, the employee shall turn-over all his/her present and pending assignments, records in custody, tools, and other office equipment including keys, computer, and mobile phone to his/her immediate supervisor. An inventory of items turned over shall be prepared by the employee and duly confirmed by his/her immediate supervisor and a representative from Audit.
- 4.1.9 Suspended employees shall be prohibited from entering the Company premises during the period of suspension. In cases of important/emergency matters which require the employee's presence inside the Company premises, prior clearance must be applied for and secured from the Group head concerned and the HRD. Management reserves its rights deny the application for clearance or to assign and provide a Security Escort, if necessary.
- 4.1.10 All documents/records pertaining to the case shall be included in the 201 file of the employee.

## 4.2 Application of Penalty



- 4.2.1 All penalties provided in this Code of Conduct shall be imposed after the employee concerned has been accorded due process.
- 4.2.2 Offenses which are not enumerated in this Code of Conduct, but nevertheless constitute violations against established work rules and practices shall be decided by management through the HRD in accordance with applicable laws and regulatory issuances which shall include but not be limited to the Revised Penal Code, the Labor Code of the Philippines and the Omnibus Rules implementing the Labor Code, the Civil Code of the Philippines, and the Corporation Code of the Philippines. Depending on the circumstances of the offense, Management, at its discretion, may impose a penalty not included in the Code whenever it may deem fit and necessary.
- 4.2.3 In recommending the appropriate disciplinary action, the following factors shall be taken in consideration by HR, with prior consultation with Legal:
  - 4.2.3.1 Gravity of the offense
  - 4.2.3.2 Extent of guilt/negligence
  - 4.2.3.3 Previous record of employee (201 file)
  - 4.2.3.4 Other factors which would tend to aggravate or mitigate the offense according to the nature and effects and other conditions attending its commission.
- 4.2.4 Final decision on cases submitted to the HRD will be the sole prerogative of the President of the Company.

## **5. PRESCRIPTION PERIOD**

With the exception of violations defined as crimes and felonies punishable under Philippine law, all offenses reported officially to Management shall prescribe and administrative punishment is waived if no action is taken by the Company in connection therewith with one (1) year from the date of its commission or occurrence.

## **6. MULTIPLE AND SUCCESSIVE VIOLATIONS**

- 6.1 An employee who commits two or more violations on one occasion shall be meted the penalty corresponding to the most serious violation.
- 6.2 An employee who has been suspended without pay for two (2) or more times within one (1) calendar year for various offenses shall be dismissed from the Company.
- 6.3 An employee who has been issued written warning for two (2) or more times within one (1) calendar year for various offenses shall be given suspension without pay for at least two (2) days. Subsequent violations shall be treated with stiffer penalty including dismissal from the Company, if warranted.

## **7. NON-RESTRICTIVE CLAUSE**

The company reserves the right in the exercise of its sole prerogative to add, delete, amend, and/or revise these rules as it may deem necessary; and upon proper notice or publication, such amendments, modification and or revisions shall be an integral part of this Code.



## 8. EFFECTIVITY

This Business Integrity Program, approved by the Board of Directors on the 24<sup>th</sup> 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 <sup>st</sup> Offense	2 <sup>nd</sup> Offense	3 <sup>rd</sup> Offense	4 <sup>th</sup> Offense	5 <sup>th</sup> Offense
<b>1. Offenses against company property / property of others</b>					
<b>1.1</b> Deliberately damaging or attempting to damage Company property	DISMISSAL				
<b>1.2</b> Deliberately damaging or attempting to damage property of Company officer or co-employees within Company premises	10 DAYS SUSPENSION	DISMISSAL			
<b>1.3</b> Unauthorized use of Company materials, tools, machinery, equipment, or vehicles for personal profit, gain, or use	WRITTEN WARNING	10 DAYS SUSPENSION	DISMISSAL		
<b>1.4</b> 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)			
<b>1.5</b> 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		
<b>1.6</b> 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		
<b>1.7</b> Failure of employee/user to immediately report any damage or defect of Company equipment, machine, etc.	2 DAYS SUSPENSION	10 DAYS SUSPENSION	DISMISSAL		
<b>1.8</b> 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		
<b>1.9</b> 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.



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	1 <sup>st</sup> Offense	2 <sup>nd</sup> Offense	3 <sup>rd</sup> Offense	4 <sup>th</sup> Offense	5 <sup>th</sup> Offense
<b>2. Offenses against persons</b>					
<b>2.1</b> 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			
<b>2.2</b> Threatening, intimidating, coercing or harassing fellow employees	15 DAYS SUSPENSION	30 DAYS SUSPENSION	DISMISSAL		
<b>2.3</b> Provoking or instigating a fight or fighting inside the Company premise	15 DAYS SUSPENSION	30 DAYS SUSPENSION	DISMISSAL		
<b>2.4</b> Making vicious, offensive, malicious, or disrespectful statements against co-employee	10 DAYS SUSPENSION	30 DAYS SUSPENSION	DISMISSAL		
<b>2.5</b> 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		
<b>2.6</b> Making offensive statements or actions that constitute sexual harassment	DISMISSAL				

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<b>3. Offenses against company interest</b>					
<b>3.1</b> 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				
<b>3.2</b> Misappropriation of company funds regardless of amount	DISMISSAL				
<b>3.3</b> Unauthorized disclosure of Company's classified information, trade secrets, or permitting or assisting any person to access to such confidential information	DISMISSAL				
<b>3.4</b> 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 <sup>st</sup> Offense	2 <sup>nd</sup> Offense	3 <sup>rd</sup> Offense	4 <sup>th</sup> Offense	5 <sup>th</sup> Offense
<b>4. Work Related Offenses</b>					
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 DISMISSAL
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 DISMISSAL
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 DISMISSAL
4.10	Abuse of breaktime in excess of authorized break period.	ORAL REPRIMAND	WRITTEN WARNING	5 DAYS SUSPENSION	10 DAYS SUSPENSION DISMISSAL

OFFENSE	PENALTIES				
	1 <sup>st</sup> Offense	2 <sup>nd</sup> Offense	3 <sup>rd</sup> Offense	4 <sup>th</sup> Offense	5 <sup>th</sup> Offense
<b>5. Offenses Against Public Morals</b>					



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, <b>except during Company authorized employee engagement activities</b>	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		

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<b>6. Violations Against Health / Safety / Security Regulations</b>						
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		





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