



CODE OF CONDUCT

A. GENERAL PURPOSE

This Code of Conduct is crafted with the view of creating a culture of integrity, excellence, respect and honesty through the establishment of clear guidelines on the acceptable demeanor and deportment of employees in their regular dealings with co-employees, management and clients.

B. IMPLEMENTING RULES AND GUIDELINES

1. All employees, regardless of rank and position, are duty bound to know, understand and familiarize themselves with the Company's rules and regulations as embodied in this Code of Conduct or on any subsequent policies which may be issued by the Company. Any existing policies which are not expressly mentioned herein are deemed incorporated in this Code of Conduct.
2. Disciplinary actions enumerated and expressed herein shall not be construed as limiting the prerogative of the Company to take appropriate measures for acts or omissions not enumerated or not explicitly falling under any of the violations or offenses enumerated herein. Such acts or omissions shall be governed by the appropriate provisions of the Labor Code of the Philippines and other applicable labor regulations or issuances.
3. As a member of this organization, each employee, regardless of rank and position, has the responsibility to immediately and accurately report any seeming violation of this Code of Conduct to any of the following levels of authority:
 - a) 1st Level: Supervisor of Concerned employee
 - b) 2nd Level: Department Head of Concerned employee
 - c) 3rd Level: Head of Human Resources & Administrative Department
 - d) 4th Level: Chief Operating Officer, President or Chairman
4. Concealment by an employee of any act or omission by another employee which constitutes a violation of any of the offenses embodied in the Code of Conduct shall be disciplined accordingly regardless of the motive of such employee [See Item (F) 3.2].
5. Employees who connive to willfully commit any of the offenses and violations in this Code of Conduct shall all be treated as principals.
6. All managerial and supervisory employees are duty bound to faithfully observe and effectively implement the provisions of the Code of Conduct.

7. If the offense or violation committed also constitutes a crime or an actionable wrong within the Philippine jurisdiction, the Company's administrative disciplinary action will not bar the Company from filing criminal charges or civil action, if warranted.
8. In the conduct of disciplinary actions, the Committee on Discipline [See Item (C)2]] shall not be bound by the strict technical rules of procedure and evidence.
9. The Company fully reserves the right to amend, alter or modify this Code or the provisions therein from time to time.

C. PROCEDURE

1. Preliminary Investigation

- a) The Immediate Superior of the concerned employee shall be responsible in conducting a Preliminary Investigation on any reported violations of the Code of Conduct. Failure to initiate and/or conduct a Preliminary Investigation, despite personal knowledge or formal receipt of a reported incident regarding an alleged violation of the Code of Conduct, shall be subjected to corresponding disciplinary action [See Item (F)3.2 and (F)6.20]
- b) Upon ascertaining that indeed there is a probable violation of the Code of Conduct, the Immediate Superior shall prepare a written Incident Report narrating the alleged acts or omissions constituting a violation of any provisions in the Code of Conduct. Findings during the preliminary investigation which prompted the Immediate Superior to issue an Incident Report should be clearly indicated and discussed therein.
- c) The written Incident Report must be submitted to the Head of Human Resources Department and Administrative Department ("Human Resources") within five (5) working days upon knowledge or receipt of the reported incident.

2. Creation of Committee on Discipline

- a) Upon receipt of the Incident Report, the Head of Human Resources will create a Committee on Discipline composed of one representative from the Human Resources, one from Legal & Compliance Department ("Legal") and the Immediate Superior or Department Head of the concerned employee.
- b) The Committee on Discipline will convene to finalize a roster of the provisions which are seemingly violated by the reported acts or the omissions of the concerned employee.
- c) The Committee on Discipline shall treat all information related to the proceedings in utmost confidentiality.

3. Issuance of Notice to Explain

- a) Based on the evaluation of the Committee on Discipline, the Human Resources representative will draft the Notice to Explain citing all the apparent provisions

violated by the concerned employee and the corresponding act or omission which convinced the Committee on Discipline to cite such provision as having been violated.

- b) The Notice to Explain should also contain:
 - i. The specific causes or grounds for potential disciplinary action as provided for in the Company's Code of Conduct or under Article 297 of the Labor Code, as amended.
 - ii. Detailed narration of the facts and circumstances that will serve as basis for the charge against the employee. A general description of the charge will not suffice; and
 - iii. A directive that the concerned employee is given opportunity to submit a Written Explanation at least five (5) calendar days from receipt of the notice.
- c) The Legal representative will review the drafted Notice to Explain and ensure that all potential violations are covered by the same.
- d) All the members of the Committee on Discipline shall affix their signatures on the Notice to Explain. Additionally, the President or the Chairman must approve the Notice to Explain prior issuance to the concerned employee.
- e) A written invitation for a conference, signed by the Immediate Superior, will be sent to the concerned employee. It is the responsibility of the Immediate Superior to issue and discuss the contents and consequences of a Notice to Explain. The Human Resources and / or Legal representative may act as witness and / or resource person as may be necessary during the issuance of such document.
- f) The Notice to Explain shall be transmitted to the employee's last known address in case the concerned employee failed to appear during the conference or refused to accept and acknowledge the Notice to Explain during the scheduled conference.

4. Formal Investigation

- a) While waiting for the Written Explanation of the concerned employee in response to the Notice to Explain, the members of the Committee on Discipline may already proceed with the formal investigation in relation to the cited violation of the concerned employee.
- b) The Committee on Discipline may summon and investigate employees or any non-employees who may have personal knowledge on the reported violations.
- c) Further, the Committee on Discipline may request documents, reports or any pieces of evidence which are in the custody of another employee or any non-employee.
- d) The employee concerned shall be given a reasonable opportunity to explain or refute any findings made by the Committee on Discipline during the Formal Investigation.
- e) If based on the formal investigation, there will emerge new findings which constitute a distinct violation of the Code of Conduct, the Committee on Discipline will issue a new Notice to Explain embodying such additional findings. Procedure from Item (C) 3

onwards should likewise be observed. However, if the new findings do not constitute a separate and distinct violation of the Code of Conduct but merely corroborate or buttress the initial findings alleged in the already issued Notice to Explain, the Committee on Discipline will issue a Supplementary Memorandum embodying such newly discovered findings.

5. Administrative Hearing

- a) Upon submission of the concerned employee's Written Explanation, the Committee on Discipline may, on its discretion, after careful evaluation of the administrative case on hand, set and schedule a formal administrative hearing. The Committee on Discipline shall nonetheless conduct a formal administrative hearing if requested in writing by the concerned employee.
- b) If the Committee on Discipline deems it necessary to conduct a formal hearing or if the concerned employee requests for one, a Notice of Hearing shall be sent to the concerned employee at least five (5) days before the scheduled hearing. For meritorious reasons, the schedule may be reset as requested by the concerned employee or any of the members of the Committee on Discipline.
- c) The concerned employee may opt to invite his or her counsel of choice during the administrative hearing. However, the concerned employee must ensure that the counsel conducts himself/herself in an orderly manner and abides by the Committee on Discipline's rules, procedures and decorum.
- d) The administrative hearing shall be recorded in order to comprehensively capture the discussions during the hearing. If the concerned employee refuses to permit the Committee on Discipline to record the hearing, one of the members shall prepare minutes of the meeting to be signed by all of the parties present during the hearing.

6. Issuance of Notice of Decisions

- a) The Committee on Discipline shall convene and finalize the appropriate disciplinary action to be meted out to the concerned employee.
- b) In arriving with the final sanction, the Committee on Discipline should consider the presence of mitigating and / or aggravating circumstances [Sections G and H hereof]. These circumstances and all other factors considered by the Committee on Discipline in coming up with the sanction must be fully discussed in the Notice of Decision.
- c) The Human Resources representative shall draft the final recommendation of the Notice of Decision while the Legal representative shall review the same. All Notices of Decision shall be approved by the Chairman or President. A written invitation for a conference, signed by the Immediate Superior, will be sent to the concerned employee. It is the responsibility of the Immediate Superior to issue and discuss the contents and consequences of a Notice of Decision. In cases of Dismissal, the Immediate Superior shall be accompanied by the Head of Human Resources and, if necessary, by the Head of Legal.

- d) The Notice to Explain shall be transmitted to the employee's last known address in case the concerned employee failed to appear during the conference or refused to accept and acknowledge the Notice of Decision during the scheduled conference.

7. Implementation of Penalty

- a) In cases of Written Reprimand, the Notice of Decision shall already incorporate the same.
- b) In cases of Suspension, the Immediate Superior may, with the concurrence of the Department Head, recommend the days when the concerned employee will be prohibited to report from work. Suspension, as a penalty, shall be without pay. The schedule of suspension should not be more than one month from the date of issuance of the Notice of Decision.
- c) In cases of Dismissal, the employment of the concerned employee shall be deemed terminated the day after personal receipt or transmittal (through registered mail) of such Notice of Decision.

8. Documentation

- a) All notices, documents and communications related to the case will be filed in the employee's 201 File.

9. Post Termination Clearance

- a) In case the penalty meted out is Dismissal, the employee shall immediately process his / her clearance and turn over any pending accountabilities. Otherwise, the Company may hold his / her last pay.

D. DEFINITION OF DISCIPLINARY ACTIONS

1. **WRITTEN REPRIMAND:** A written admonition to the erring employee censuring him / her for his / her fault, and warning him/ her of the adverse consequences that may result for his / her repetition of the same or commission of other offenses.
2. **SUSPENSION:** A penalty of forced temporary absence from duty on a without pay status, the length of which is dependent on the nature of the offense and the effect thereof, duration as deemed necessary by the Committee on Discipline.
3. **DISMISSAL:** A permanent cessation of employee-employer relationship and deletion from the Company's payroll and list of employees.
4. **RESTITUTION:** The duty of the concerned employee to restore funds or properties, or the equivalent value of the latter, which have been damaged or lost due to his action or omission constituting a violation of the Code of Conduct. Failure to comply with this disciplinary action would warrant the withholding of the concerned employee's salary and other monetary receivables from the company. Restitution may be mandated by the Committee on Discipline if warranted by the nature of the offense committed.

5. **PREVENTIVE SUSPENSION** is not to be construed as a disciplinary action nor a penalty. Rather, it is a precautionary measure for the protection of the Company’s property pending investigation of any alleged malfeasance or misfeasance committed by the concerned employee. The Company may place the concerned employee under preventive suspension without pay for a maximum period of thirty (30) days if his continued employment poses a serious and imminent threat to the life or property of the employer or of his co-workers.

If after the lapse of thirty (30) days, the Committee on Discipline does not have a final resolution and decision yet with respect to the concerned employee’s case, the concerned employee will be automatically reinstated in the payroll but shall continue to be prohibited from reporting to the office and discharging his / her duties as an employee of the Company.

E. SCALE OF PENALTIES

| | 1st Offense | 2nd Offense | 3rd Offense | 4th Offense | 5th Offense |
|-----------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|
| Light Offense | Written Reprimand | Five (5) Day Suspension | Ten (10) Day Suspension | Fifteen (15) Day Suspension | Dismissal |
| Less Serious Offense | Five (5) Day Suspension | Ten (10) Day Suspension | Fifteen (15) Day Suspension | Dismissal | |
| Serious Offense | Ten (10) Day Suspension | Fifteen (15) Day Suspension | Dismissal | | |
| Grave Offense | Dismissal | | | | |

F. PUNISHABLE ACTS OR OMISSIONS

| 1. Against Persons: | | |
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| 1.1 | Threatening, intimidating, coercing, harassing or provoking Company owners, officers, managers, supervisors or any of the Company’s authorized representatives | Grave Offense |
| 1.2 | Bringing friends, accomplices or any non-employees into the company premises to cause trouble, to inflict injuries on any persons within the company premises or to damage any company property. | Grave Offense |
| 1.3 | Willfully inflicting, or attempting to inflict, bodily injury upon another person within the company premises and/or during company time. | Grave Offense |
| 1.4 | Threatening, intimidating, coercing, harassing or provoking fellow employees or visitors/guests. | Serious Offense |

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| 1.5 | Fighting within the company premises and/or during company time whether or not the same results in bodily harm to any person. | Serious Offense |
| 1.6 | Challenging anybody to a fight within company premises and/or during working time. | Serious Offense |

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| 2. Against Property: | | |
| 2.1 | Robbing, stealing or attempting to rob or steal company funds or company property. | Grave Offense |
| 2.2 | Robbing, stealing or attempting to rob or steal personal property of other employees, visitors or guests. | Grave Offense |
| 2.3 | Obtaining company funds, monies, securities, checks or any other negotiable and / or financial instruments through embezzlement or swindling whether alone or in connivance with others. | Grave Offense |
| 2.4 | Obtaining materials or supplies, by means of fraudulent orders or papers, whether alone or in connivance with other persons. | Grave Offense |
| 2.5 | Substituting or attempting to substitute company material or equipment with articles of inferior value and / or quality. | Grave Offense |
| 2.6 | Favoring suppliers (supplying materials or services to the Company) in consideration of kickbacks or personal rebates or commissions. | Grave Offense |
| 2.7 | Unauthorized withdrawal of salary, allowance, money and other benefits belonging to other employees. | Grave Offense |
| 2.8 | Forcing entry or entering into the company office or premises outside office hours without the necessary overtime work authorization or permission from the Management. | Grave Offense |
| 2.9 | Driving company vehicles under the influence of liquor or prohibited drugs, or operating the same recklessly, causing injury or death to third party(ies), and/or damage to company and third-party vehicles/property. | Grave Offense |

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| | In such cases, any damage or injury caused to the company's property, or to the person or property of any employee or third party shall be for the sole and exclusive account of the erring employee(s). | |
| 2.10 | Unauthorized bringing or taking out of tools, supplies, equipment or other property belonging to the company. | Serious Offense |
| 2.11 | Unauthorized use, or lending to another, of any company vehicles and/or major equipment for any purpose causing injury or damage to the company' properties, properties owned by third party(ies) and/or to the persons of employees and non-employees. In such cases, any damage or injury caused to the company's property, or to the person or property of any employee or third party shall be for the sole and exclusive account of the erring employee(s). | Serious Offense |
| 2.12 | Driving company vehicles without authority. | Serious Offense |
| 2.13 | Willfully damaging or attempting to damage company property. | Serious Offense |
| 2.14 | Damaging company property through negligence. | Less Serious Offense |
| 2.15 | Willfully damaging or attempting to damage property of other employees. | Less Serious Offense |
| 2.16 | Driving company vehicles without a valid driver's license. | Less Serious Offense |
| 2.17 | Improper or incorrect use of company materials, vehicles and/or equipment. | Less Serious Offense |
| 2.18 | Unauthorized use of company time, material, equipment or property to perform personal and/or unauthorized work inside company premises. | Less Serious Offense |
| 2.19 | Unauthorized use of company facilities and/or materials and office equipment for private matters and/or personal interests. | Light Offense |
| 2.20 | Damaging the property of other employees through negligence. | Light Offense |

| 3. Against Company Interest and/or Policy: | | |
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| 3.1 | Willfully giving false statements, reports or testimonies during an administrative investigation. | Grave Offense |
| 3.2 | Willfully making false reports or statements, of any nature, in ones personnel file or company record and/or documents. | Grave Offense |
| 3.3 | Any falsification or attempt to falsify an expense report, receipts or any other documents upon which allowances or reimbursable expenses appear higher than actually spent. | Grave Offense |
| 3.4 | Loss of company documents, monies, checks, securities, negotiable and / or financial instruments and other company properties due to gross negligence. Gross negligence implies a lack of, or failure to exercise, slight care or diligence, or the total absence of care in the performance of duties, not inadvertently but willfully and intentionally, with conscious indifference insofar as other persons may be affected. | Grave Offense |
| 3.5 | Accepting, directly or indirectly, any unauthorized sum of money, commission, offer, promise, in consideration of any act, contract, decision or service connected with the discharge of the employee's official duties. | Grave Offense |
| 3.6 | Offering or accepting anything of value in exchange for a job, work assignment, work location or favorable condition of employment. | Grave Offense |
| 3.7 | Falsifying time records, including time records of other employees. All employees complicit in the act, directly or indirectly, shall be subject to disciplinary action. | Serious Offense |
| 3.8 | Giving identification materials (e.g. Company ID) to any person not entitled to it, or assisting any outsider to enter the company premises without authorization. | Serious Offense |
| 3.9 | Performing any act legally binding the company with any person, banking institution, corporation or other group/entity involving the company without authorization. | Serious Offense |
| 3.10 | Abuse of position or authority to gain profit or advantage from employees under one's supervision. | Serious Offense |

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| 3.11 | Falsification of any other document, whether internal or external, which is relevant to, or affects, the Company and/or its business. | Serious Offense |
| 3.12 | Concealing matters relevant and material to a case during a company administrative investigation. | Equivalent to the penalty for the offense charged against the employee under investigation |

| 4. Against Safety and Security: | | |
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| 4.1 | Unauthorized possession of a master key(s) or key(s) of similar characteristics that can open any company or other employee's office, locker and/or drawers. | Grave Offense |
| 4.2 | Carrying of firearms or any deadly weapon within the company premises without proper authorization. | Grave Offense |
| 4.3 | Refusal to submit to, or failure to meet, security requirements of the company. | Serious Offense |
| 4.4 | Tampering with, or unauthorized use of, any fire protection equipment and/or electrical equipment which can lead to property damage, death and/or injury. | Serious Offense |
| 4.5 | Failure to report, or concealment of, any contagious, serious or communicable disease to the appropriate company officer(s) when said ailment endangers other employees. | Serious Offense |
| 4.6 | Performing work outside of the assignment, qualifications or expertise of the employee, which endangers the safety of other employees and/or company properties or equipment. | Serious Offense |
| 4.7 | Assigning work outside of the assignment, qualifications or expertise of a subordinate employee, which endangers the safety of other employees and/or company properties or equipment. | Serious Offense |
| 4.8 | Allowing the entry of, and/or failing to report the presence of, unauthorized personnel entering or loitering in one's work area. | Less Serious Offense |
| 4.9 | Violation of a company safety rule, violation of general safety practices in the performance of work, failure to | Less Serious Offense |

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| | report an accident(s), or failure to wear or use the required safety equipment provided. | |
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| 5. Against Good Customs and Public Morals: | | |
| 5.1 | Possession, buying or selling of prohibited/illegal drugs or substances on the company premises and/or during company time. | Grave Offense |
| 5.2 | Being under the influence of alcohol, prohibited drugs or substances and/or hallucinogens during office hours and/or while inside the company premises, unless authorized by a physician (in cases of prohibited drugs or substances and / or hallucinogens) or by the company (in case of alcoholic drinks during company sanctioned events). | Serious Offense |
| 5.3 | Grossly indecent conduct or using profane or defamatory language in addressing another person within the company premises and/or during working hours. | Serious Offense |
| 5.4 | Showing and/or exhibiting pornographic materials, movies, pictures or literature within the company premises and/or during working hours. | Serious Offense |
| 5.5 | Bringing or possessing alcoholic beverages (unless duly authorized by the company). | Less Serious Offense |
| 5.6 | Sexual harassment, as provided for, and defined, by law and in the company policy. | See Policy on Anti Sexual Harassment |

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| 6. Against Order: | | |
| 6.1 | Inciting or participating in riots, disorders, illegal strikes, illegal concerted actions or any analogous unauthorized collective disorderly conduct against the company. | Grave Offense |
| 6.2 | Conviction of any crime against the person of the employer, employer’s immediate family and employer’s representatives by a court of law. | Grave Offense |
| 6.3 | Encouraging, coercing, initiating, bribing or inducing any of the employees to engage in any practice in violation of company rules and regulations. | Serious Offense |

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| 6.4 | Circulating written or printed subversive, libelous or unlawful illegal materials, at any time within the company facilities or premises. | Serious Offense |
| 6.5 | Refusal of an employee to submit himself/herself to an administrative investigation and or inquiry. | Serious Offense |
| 6.6 | Horse-playing (rough or boisterous play) which results in physical injury to another, or loss/spoilage of any company property. For purposes of 6.7 and 6.8, “Horse-playing” refers to rough or boisterous play, including, but not limited to catcalling, unnecessary shouting, unnecessary throwing of things, unnecessary running or similar disorderly conduct during company time and/or within company premises. | Serious Offense |
| 6.7 | Leaving work assignments or the work premises during working hours without permission from superior. | Serious Offense |
| 6.8 | Disorderly conduct towards Company owners, officers, guests, managers, supervisors, fellow employees or in his dealings with the public in general. | Less Serious Offense |
| 6.9 | Horse-playing of minor nature which does not result in injury or damage to persons or property. | Less Serious Offense |
| 6.10 | Unauthorized activities inside the company premises, whether or not during working hours, such as, but not limited to: (i) selling or distributing merchandise or other goods; (ii) solicitation or collection of funds, (iii) lending money with an interest charge for reason of personal gain; (iv) similar acts comprising personal business activities and/or jobs for other persons/employers/principals. | Less Serious Offense |
| 6.11 | Malingering or feigning illness to avoid performing assigned work. | Less Serious Offense |
| 6.12 | Limiting or contracting one’s own production/service output or slowing down or hindering the production/service output of co-employees. | Less Serious Offense |
| 6.13 | “Insubordination”, defined as a direct or indirect refusal by an employee to perform a legal, ethical, and reasonable directive(s), work instruction(s), | Less Serious Offense |

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| | schedule(s) and/or assignment(s) from the employee's Immediate Superior or Department Head when the directive has been clearly communicated to and understood by the employee. | |
| 6.14 | Failure to report damage to, or loss of, company property. | Less Serious Offense |
| 6.15 | Failure to report immediately within a reasonable time a personal injury sustained in the line of duty or in the course of employment occurring on company property and/or during working hours. | Less Serious Offense |
| 6.16 | Holding unauthorized meetings within the company premises and/or during working hours. | Less Serious Offense |
| 6.17 | Disregarding or disobeying any memoranda, order, office regulation, wherein no penalty is prescribed for such disregard or disobedience. | Less Serious Offense |
| 6.18 | Unauthorized absence as provided in the Company Granted and Government Mandated Leave Policy. | Light Offense |
| 6.19 | "Insolence", which occurs when an employee mocks, insults, disrespects or shows similar inappropriate behavior toward an employee's Immediate Superior or Department Head without necessarily manifesting a refusal to perform directives, work instructions, schedules and/or assignments. | Light Offense |
| 6.20 | Failure to report offenses committed by others. | The penalty shall be one degree lighter than the penalty for the unreported offense committed by others |

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| 7. Related to Confidentiality: | | |
| 7.1 | Divulging restricted or confidential company information voluntarily or willfully to outsiders or unauthorized persons/parties, without authorization from Management. Revealing or divulging company trade secrets, plans, operations, finances, inventories and other confidential and/or proprietary matters or information that will be detrimental to the company's interest. | Grave Offense |

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| 7.2 | Unauthorized removal of company property, records, or any other item which is classified as, or contains, confidential information. | Grave Offense |
| 7.3 | Breaching a Non-disclosure Agreement, Confidentiality Agreement or similar contract to which the Company is a party. | Grave Offense |

| 8. Related to Performance and Company Rules: | | |
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| 8.1 | Other forms of negligence, carelessness or neglect of duty. | Less Serious Offense |
| 8.2 | Disturbing proper office decorum in a manner not covered by any existing company policy or rule. | Light Offense |
| 8.3 | Creating or contributing to unsanitary conditions or violating ordinary rules on sanitation. | Light Offense |
| 8.4 | Failure to turn off lights, appliances, equipment, faucets etc. when not in use. | Light Offense |
| 8.5 | Failure to follow policy on the use of the Biometric scanner. | Light Offense |
| 8.6 | Failure to wear prescribed office attire and / or uniform(s), maintain proper personal hygiene and grooming during working hours while inside Company premises. | Light Offense |
| 8.7 | Failure to submit reports, statements, invoices, delivery receipts on time as required by the Company. | Light Offense |
| 8.8 | Sleeping, wasting time, loitering, frequently receiving personal visitors or excessive use of telephones for personal business during working hours. | Light Offense |
| 8.9 | <p>Repetitive neglect of work assignments, inefficiency in performing one’s duty or incompetence.</p> <p>“Incompetence” is deemed to be existing when an employee failed to meet satisfactory evaluation for two (2) consecutive quarterly performance appraisals.</p> <p>“Inefficiency” is deemed to be existing when an employee repetitively fails to utilize company resources in an effective way.</p> | Light Offense |

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G. MITIGATING CIRCUMSTANCES: The following circumstances may be considered by the Committee on Discipline in lowering the final penalty for the concerned employee:

1. Length of the employee's service.
2. Absence of any previous disciplinary record.
3. Expressed remorse or contrition and promise to reform by the employee.
4. Previous exemplary service in the company.
5. Spontaneous admission.
6. Absence of direct financial losses incurred by the company.
7. Any factual circumstance attendant to the case which would warrant the lowering of the penalty.

H. AGGRAVATING CIRCUMSTANCES: The following circumstances may be considered by the Committee on Discipline in increasing the final penalty for the concerned employee:

1. Length of the employee's service.
2. Presence of any previous disciplinary record.
3. Employee's defiant or remorseless attitude.
4. Previous poor performance.
5. Intent to conceal the infraction.
6. Presence of direct financial losses incurred by the company.
7. Employment of violence or force in the commission of the infraction.
8. Intent to gain from the company, direct or indirectly.
9. Degree of injury or damage caused to the Company or to any persons and / or property.
10. Number of persons or properties adversely affected.
11. Any factual circumstance attendant to the case which would warrant the increase of the penalty.

I. CLEANSING PERIOD

A cleansing period of one (1) year will be afforded to employees to prove to the Company that he has fully reformed. However, the cleansing period shall be applicable only to Light Offenses.

After such cleansing period, the previous infractions of Light Offenses will no longer be considered in imposing penalties for subsequent Light Offenses which may be committed by the employee.

J. COPY RIGHT

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K. EFFECTIVITY

This Code of Conduct shall take effect starting April 1, 2017.