CODE OF CONDUCT

All of the Company's directors, senior management, and employees observe and comply with the Company's Code of Conduct.

The Company ensures and shall ensure that all its directors, senior management, and employees shall adhere to the highest ethical standards of behaviour and conduct in the performance of their duties, and in the conduct of their relationships with internal and external publics.

IMPLEMENTATION

To effectively implement the Code of Conduct, the Company has disseminated the same to all the directors, senior management, and employees, to fully apprise them of its provisions. The Company has also put in place procedures and a grievance machinery to give due course to complaints of violations, with apt regard for the requirements of due process.

A. Conduct or behaviour relating to work hours and attendance

- Excessive Tardiness Unauthorized tardiness five (5) times in a calendar month, or a cumulative unauthorized tardiness time of two (2) hours or more in a calendar month.
- 2. Unauthorized Undertime
- 3. Absence Without Leave (AWOL) with duration of one (1) to three (3) days.
- 4. Absences Without Leave (AWOL) with a duration of four (4) or more consecutive working days (considered as "Abandonment of Job" unless employee can present justifiable evidence why he was not able to inform the company of his absence during said period).
- 5. Non-observance of established break periods
- 6. Malingering or pretending to be sick
- 7. Failure to time in and/or out in excess of three (3) times in a calendar month without any justifiable reason.
- 8. Intentionally punching out of another employee's timecard or filling up another employee's timesheet (on occasions when manual timekeeping is required)

- 9. Falsifying, tampering or altering entries on one's Daily Time Record (DTR) or that of another employee
- 10. Tampering with the timekeeping device or similar equipment of recording employee attendance

B. Conduct or behaviour relating to relationship with superiors and performance of assigned duties

- 1. Loitering, idling or loafing while on Company time
- 2. Doing unauthorized work within Company premises while on Company time
- 3. Sleeping on the job
- 4. Failure to do assigned task, or to follow or obey any verbal or written order or instruction of superior, or to follow established procedures (not constituting insubordination).
- 5. Persistently or continuously doing unsatisfactory work notwithstanding the reminder or instruction given to improve work.
- 6. Gross negligence resulting to damage of any Company property.
- 7. Deliberate and intentional slowdown of work
- 8. Intentional refusal to do assigned task, or to follow or obey any verbal or written order or instruction of superior, or to follow established procedures (insubordination).
- 9. Gross and/or habitual neglect by an employee in the performance of his duties
- 10.Serious misconduct or wilful disobedience to the lawful orders of instructions of one's superior or the authorized representative of the department in connection with his work.

C. Conduct or behaviour relating to health, sanitation and hygiene

- 1. Creating or contributing to unsanitary conditions within the Company premises or sites.
- 2. Unjust refusal or intentional failure to submit to medical examinations when required
- 3. Concealment of any affliction of sickness or disease that is not harmful to the health of other employees.
- 4. Deliberate concealment of any affliction of sickness or disease that is highly contagious or may be harmful to the health of other employees.

D. Conduct or behaviour relating to security and safety

- Failure or negligence to observe security and safety rules, instructions, or established practices or procedures regarding the prevention or minimization of an accident or injury.
- 2. Refusal to observe security and safety rules, instructions, or established practices or procedures regarding the prevention or minimization of an accident or injury.
- 3. Refusal to submit to security checks or to security requirements and procedures of the Company
- 4. Unauthorized possession of a deadly weapon within the Company property or sites, or while doing work or attending Company functions outside Company premises.
- 5. Providing a means of entry for unauthorized personnel.

E. Conduct or behaviour relating to persons

- 1. Intimidating, coercing or harassing any Company officer superior, co-employee, client or guest of the Company in any manner and for any reason.
- 2. Instigating a fight, challenging to a fight, or making any remarks which amount to a dare or a challenge, to any Company officer, superior, co-employee, client or guest of the Company.
- 3. Attempting or threatening to cause bodily harm or injury to the person of any Company officer, superior, co-employee, client or guest of the Company.
- 4. Causing any bodily harm or injury to the person of any Company officer, superior, co-employee, client or guest of the Company, which acts cannot be justified by legitimate self-defense or any extenuating circumstances.
- 5. Commission of a crime by an employee against the Company or against the person of its officers, employees or duly authorized representatives.

F. Conduct or behaviour relating to Company or other person's property

- 1. Unauthorized use of Company property.
- 2. Use of Company property for unathorized purposes.
- 3. Negligence or reckless imprudence resulting to loss of or damage to Company property.

- 4. Posing or writing any derogatory articles, materials, prints or drawings on Company property or on the property of any other person; defacing, unathorized removal or posting on any bulletin board, painting/writing of any graffiti or slogans on walls, buildings or other Company property or the property of any other person within Company premises.
- 5. Malicious or intentional misuse, destruction, or damage of Company property or the property of any other employee, guest or customer of the Company, or any attempt thereof.
- 6. Infidelity (wilful breach of trust) in the custody of materials, machineries, equipment, documents, or any other Company property.
- 7. Unauthorized and deliberate substitution of materials and/or equipment owned or required by the Company with another of inferior quality or value, or any attempt thereof.
- 8. Theft of any Company property or the property of any other employee, guest or customer of the Company; or abetting, assisting, conniving, conspiring with any other person in the commission of such acts; or any attempt thereof.

G. Conduct or behaviour relating to IT Equipment and their related facilities

- 1. Use of computer systems for matters not related to the employees's official duties or to Company business (e.g. junk mail, unofficial ads, rumors, false information, etc.)
- 2. Introducing pornographic images or other morally offensive materials in the information system or the use thereof.
- 3. Unauthorized use of access code of another person (e.g. Log-in names, passwords, personal identification numbers (PIN), etc.)
- 4. Installing, using, or downloading computer files/programs/software and /or hardware without authority.
- 5. Allowing another person to use one's own access code for unathorized purposes.
- 6. Bypassing information systems security for unauthorized purposes.
- 7. Accessing of restricted information systems, files, or other information without proper authorization.

- 8. Unauthorized use of e-mail resulting in damage to the Company.
- 9. Introducing or using unlicensed or non-Company approved software or computer materials.
- 10.Piracy of Company-licensed computer software or materials.
- 11.Damage or destruction of critical computer files or applications through gross negligence
- 12. Deliberately tampering or causing damage or destruction of critical computer files or applications.

H. Conduct or behaviour relating to decency and public morals

- Gambling or betting in any form, kind or manner; soliciting or collecting bets; illegal lottery; or engaging in any kind of such within Company premises or sites, within or outside work hours.
- 2. Reporting to work under the influence of liquor or illegal drugs; unruly behaviour due to influence of liquor or illegal drugs within the Company premises or sites or during a Company function outside Company premises.
- 3. Engaging in the lending of money at unreasonably or unconsciously very high interest rates (such as, but not limited to "5:6" or similar lending schemes) during working hours within Company premises.
- 4. Any act constituting an offense against the honor of any person (libel, oral defamation, or slander by deed) committed within Company premises.
- 5. Spreading of rumors about the Company or any of its employees or formenting intrigue among employees.
- 6. Indecent and/or immoral conduct unbecoming or a Company employee within Company premises or sites, or while doing work or attending a Company function outside Company premises.
- 7. Commission of any crime punishable by law.

I. Conduct or behaviour relating to Company funds, interests, policies, administration and authority

- 1. Refusal to participate in an official Company investigation.
- 2. Giving false statements during an official Company investigation or any attempt thereof.

- 3. Tampering of Company memo, correspondences, announcements, notices, records or any other document.
- 4. Falsification of Company records.
- 5. Unauthorized use of Company funds.
- 6. Infidelity (wilful breach of trust) in the custody of Company funds.
- 7. Obtaining or abetting others to obtain company funds or property through the use of fraudulent and/or falsified documents, or any attempt thereof.
- 8. Committing any act that may jeopardize the Company or any of its interests.
- 9. Divulging of confidential and restricted information that may lead, directly or indirectly, to a disadvantage for the Company.
- 10.Performing work, directly or indirectly, for a competitor company without prior written approval from the Company.
- 11. Misrepresentation of the Company outside establishments, gatherings or contracts.
- 12. Soliciting or accepting bribes or other favors in exchange for doing a job or making a decision which involves the Company.
- 13. Participation in any line of business which is in competition with that of the Company's or which may cause a conflict of interest on the part of the employee.

The corrective action for any of the unacceptable conduct and behaviour shall be based on the rule and regulations, which will be the general guide for any infraction thereof. The Company may reduce or increase the severity of the corrective action on a case-to-case basis, subject to the mitigating or aggravating circumstances surrounding the situation in which the infraction was committed, the degree of trust and confidence bestowed on the employee who committed the infraction, and the extent of damage or loss suffered by the Company because of said infraction.