

NOVO ECIJANO TEACHERS MUTUAL BENEFIT ASSOCIATION, INC.

CODE OF CONDUCT AND BUSINESS ETHICS

This Code of Conduct and Business Ethics (Code) is promulgated as a guide in promoting and enforcing discipline and order and ensure that employees adhere to the ethical and work standards and corporate values of the Company. To Uphold the good name of NOVO and to maintain public confidence and ensure the security and integrity of NOVO in the industry; Uphold the high standards of personal integrity and professionalism of NOVO Employees;

POLICY

NOVO adopts a policy to promote the highest standards of integrity and the highest degree of diligence and responsibility among its Employees. The Company has thus set standards of discipline and work ethics for its employees and shall, when circumstances so warrant, impose appropriate disciplinary action against employees who, by their acts or omissions, commit infractions and breach the work standards, policies and procedures, and rules and regulations of the Company.

RESPONSIBILITY & AUTHORITY

Every employee of NOVO is expected to observe the highest degree of integrity in his professional conduct, exercise extraordinary diligence in the performance of ones work. Failure to abide by Company policies and procedure shall be deemed as an offense and the Company has the sole discretion to take appropriate disciplinary action.

The provisions of this Code and the table of penalties¹ are deemed incorporated to the terms and conditions of the service contract of all employees.

Guidelines in the Application of Penalties

1. Only one (1) penalty shall be imposed for each case. "Each Case" means one (1) administrative charge which may involve one or more charges or counts.
2. The Management shall determine the appropriate penalties to be imposed taking into consideration mitigating and aggravating circumstances and all other circumstances. If the responded is found guilty of two or more charges or counts, the penalty imposed should be that corresponding to the most serious charge or count and the rest may be considered as aggravating circumstances.
3. Repetition of Infractions – subsequent or repeated commission of an infraction / offense by an employee who was previously meted administrative sanction for another infraction of the same nature immediately preceding twelve (12) months period shall aggravate the infraction and increase the corresponding

¹ Table of penalties as Annex A

sanction of the second or subsequent infraction to the next higher sanction or penalty.

4. Administrative Proceedings Not a Bar – Implementation of administrative sanctions on the staff concerned shall be without prejudice to the filing of civil or criminal charges in accordance with the pertinent laws for the same infraction.
5. Pecuniary Liability – Every officer or staff liable for an offense is also pecuniary liable. Pecuniary liability includes restitution/indemnity
6. Measures not considered Penalties – The following shall not be considered as penalties:
 - a) Preventive suspension from employment or office for a period not exceeding thirty (30) days during the administrative investigation.
 - b) Transfer to another office or position prior or during the investigation proceedings.
 - c) Withholding of the payment of salaries, bonuses, emoluments, and other fringe benefit during the period of suspension and/ or pendency of investigation.

PROCEDURE ON ADMINISTRATIVE INVESTIGATION

The Company shall observe procedural due process at all times. The employee must be informed of the charges against him, given the opportunity to be heard and informed of the penalties or sanctions imposed or to be imposed to him.

Any employee who commits any of the offenses defined in this Code or who does any act not explicitly defined herein as an offense but which is clearly prejudicial to the welfare/interest of the Company shall be reported to his immediate supervisor. The Company may, if circumstances warrant, also act on complaints from third parties, including but not limited to Company clients and service providers. These complaints from third parties shall be treated as incident reports and shall undergo the same procedure for administrative proceedings. The concerned Unit shall, when circumstances so warrant, reply to the third parties raising or submitting the complaint.

The Incident report should contain the following information:

1. The specific acts or omissions of the employee and the date/s thereof;
2. The nature of work or function of the employee;
3. Clients or service providers affected, if any;
4. Damage to the Company, its business and operations and its officers and employees, if any; e.
Financial loss, if any;

Due Process

- 1) If an employee is reported to have committed an offense or found, through audit or other forms of examination, to have committed an offense under this Code or other company policy/ies, the immediate superior shall immediately conduct an investigation or fact-finding inquiry.

- 2) Based on the initial investigation or fact-finding inquiry, the supervisor shall then submit a report to the HR and the HR shall issue a NTE (Notice to Explain) by personal delivery or through registered mail and shall require the responded to answer the same in writing within 24 hours from receipt
3. Once the employee submits his/her reply the HR shall then Assess the violations, the employee's explanation and the circumstances attendant to the case and decide on the applicable penalties;
4. A formal hearing may be conducted when, from the allegations of the complaint and respondent's answer, including supporting documents, the merits of the case cannot be decided judiciously without conduction such hearing, or if the respondent through his written reply requested for a hearing. In which case, HR may call for a formal hearing of the case.
5. HR shall forward the decision to the management for consultation before the implementation.
6. Once the management has approved the decision and penalties, the immediate supervisor shall implement the same.

Preventive Suspension - an employee may be placed under the preventive suspension if his continued employment poses a serious and imminent threat to the life or property of the employer or his co-workers.

The maximum period for preventive suspension without pay is thirty (30) calendar days. Thereafter, the employee shall be reinstated to his former position, or reassigned to other branches of the company, or continued to be placed under (extended) preventive suspension, in which case however, the employee shall be paid the salaries due to him.

Should at the end of the investigation, an employee placed on preventive suspension without pay be fully vindicated from the administrative charges imputed to him, he shall be paid in salary equivalent to the days he was placed on preventive suspension.

EFFECTIVITY

This Code of Conduct shall take effect upon approval of the Board of Trustees and supersedes any and all of the Company's previous codes of conduct. All other rules and regulations inconsistent with this Code are hereby superseded. All existing policies and rules consistent herewith shall supplement this Code.

ANNEX A
PENALTIES

A. OFFENSES AGAINST PERSONS	1ST	2ND	3RD	4TH
<p>1. Provoking or instigating a quarrel, or fighting in Company premises causing light physical injuries which incapacitates a person to work for or shall require medical attendance for:</p> <p>a. one to three days</p> <p>b. four to six days</p> <p>c. seven to less than ten days</p>	<p>Suspension for up to three (3) days.</p> <p>Warning (Verbal or Written Reprimand).</p> <p>Suspension for more than one (1) week but less than one (1) month.</p>	<p>Suspension for up to one (1) week.</p> <p>Suspension for more than one (1) week but less than one (1) month.</p> <p>Suspension for one (1) to six (6) months.</p>	<p>Suspension for more than one (1) week but less than one (1) month.</p> <p>Suspension for one (1) to six (6) months.</p> <p>Discharge</p>	<p>Discharge</p> <p>Discharge</p>
<p>2. Threatening, intimidating, coercing or harassing a fellow employee or anybody on the jobsite or on Company property at any time. When the offense is committed against</p>	<p>Suspension for more than one (1) week but less than one (1) month.</p>	<p>Suspension for one (1) to six (6) months.</p>	<p>Discharge</p>	

a superior, the penalty provided for insubordination shall be imposed.				
3. Inflicting less serious physical injuries (which incapacitates a person to work for ten days to thirty days or which shall require medical attendance for the same period).	Suspension for more than one (1) week but less than one (1) month.	Suspension for one (1) to six (6) months.	Discharge	
4. Inflicting serious physical injuries (which incapacitates a person to work for more than thirty days or which will require medical attendance for the same period)	Suspension for one (1) to six (6) months.	Discharge		
5. Taking the life of a Company official, employee or any person willfully or thru gross negligence on company premises or jobsite. The offenses in item 1-5 under this rule shall apply even if committed outside of company premises or during non-company time if the cause of action is work related or one that arises from a "subordinate-superior" relationship	Discharge			
6. Endangering the safety of other employees through negligence.	Suspension for up to one (1) week	Suspension for more than one (1) week but less than one (1) month	Suspension for one (1) to six (6) months	Discharge
7. Causing physical injuries to co-workers on account of carelessness or negligence.	Suspension for up to one (1) week	Suspension for more than one (1) week but less than one (1) month	Suspension for one (1) to six (6) months	Discharge
B. OFFENSES AGAINST PROPERTY	1ST	2ND	3RD	4TH
1. Malversation of Company funds.	Discharge			
2. Any form of theft, actual or frustrated, of Company property or property of co-employees, visitors or clients, or third parties committed within Company premises	Discharge			

3. Attempting to steal from Company, co-employees, visitor, clients or third parties committed within company premises; removing Company property from premises without approval from authorized personnel.	Suspension for one (1) to six (6) months	Discharge		
4. Willful destruction of Company property	Discharge			
5. Damaging Company property thru negligence or reckless, negligent or improper use of company tools and equipment.	Suspension for up to one (1) week	Suspension for more than one (1) week but less than one (1) month	Suspension for one (1) to six (6) months	Discharge
6. Unauthorized use of Company tools, equipment.	Warning (Verbal or Written Reprimand)	Discharge		
7. Driving or operating Company vehicles without valid license.	Suspension for one (1) to six (6) months	Suspension for one (1) to six (6) months	Discharge	
8. Vandalism/Graffiti (such as destroying office equipment / furniture; writing/ painting on the walls, restrooms, etc.)	Suspension for more than one (1) week but less than one (1) month	Suspension for one (1) to six (6) months	Discharge	
9. Possession of Company tools or property without authority or valid reason for processing the same.	Suspension for more than one (1) week but less than one (1) month			
C. FRAUDULENT ACTS	1ST	2ND	3RD	4TH
1. Falsifying Company records, reports, receipts, papers or other document; Forgery or attempted forgery	Discharge			
2. Falsifying daily time records.	Suspension for one (1) to six (6) months	Discharge		
3. Falsifying signatures, using another's name, or acting in the name of the Company without express authority.	Suspension for one (1) to six (6) months	Discharge		

4. Falsifying employment records, giving or submitting false statement in applying for employment.	Suspension for one (1) to six (6) months	Discharge		
5. Obtaining or attempting to obtain materials in a fraudulent manner.	Suspension for one (1) to six (6) months	Discharge		
6. Substituting Company material or equipment with other property; Altering or tampering, in any form or manner, any information, or content of e-mail, messages, or postings either with intent to mislead or destroy, or commit fraud or deception;	Suspension for one (1) to six (6) months	Discharge		
7. Unauthorized disclosure of information, trade secrets, and unauthorized access to information/data.	Suspension for more than one (1) week but less than one (1) month	Suspension for one (1) to six (6) months	Discharge	
8. Unauthorized solicitation in any form such as requests for assistance, contributions and donations either in the form of cash or otherwise.	Suspension for one (1) to six (6) months	Discharge		
9. Breach or abuse of trust reposed by the Company or duly authorized representative that may result in personal gain or possible damage or loss to the Company	Suspension for one (1) to six (6) months	Discharge		
10. Willful failure to report a clear violation of the policies, standard operating procedures or processes established by the Company	Same penalty as the offense not reported			
11. Covering up a clear violation of the policies, standard operating procedures or processes established by the Company or the client	Same penalty as the offense covered up			
12. Destruction/Concealment of any evidence to prevent the discovery of an offense whether or not there is a pending investigation	Same penalty as the offense covered up			
13. Planting or tampering in any form or manner any evidence involving himself/herself or another associate for the purpose of: (i) exonerating himself/herself or another; (ii)	Suspension for one (1) to six (6) months	Discharge		

implicating the latter in the commission of an offense; or (iii) evading responsibility for the commission of the crime or offense				
D. OFFENSES AGAINST PUBLIC MORALS	1ST	2ND	3RD	4TH
1. Using indecent, abusive, derogatory and/or indecorous words whether verbally or used in letters or communications addressed to the Company or to any of its officers, or in any written communication with clients, suppliers, third parties, or co-employees.	Suspension for more than one (1) week but less than one (1) month	Suspension for one (1) to six (6) months	Discharge	
2. Circulating false or malicious information tending to malign or besmirch the good name of the Company or any of its officers or employees; Making false or malicious statements, spreading or disseminating misleading information against any member of Management, the Directors, co- employees, clients or visitors that may harm the reputation and authority of those concerned or that of the Company, whether such statements are done orally, in print, electronically, online or in other digital formats.	Suspension for more than one (1) week but less than one (1) month	Suspension for one (1) to six (6) months	Discharge	
3. Taking part in or promoting any gambling or any other game of chance or unauthorized lottery on Company jobsite or company premises.	Suspension for more than one (1) week but less than one (1) month	Discharge		
4. Committing immoral, indecent acts, or willful indecent exposure inside company premises, property or job sites or during company-sponsored activities.	Warning (Verbal or Written Reprimand)	Suspension for up to three (3) days	Suspension for more than one (1) week but less than one (1) month	Discharge
5. Using profane or obscene language in addressing another person on Company premises, property or job sites.	Warning (Verbal or Written Reprimand)	Suspension for up to three (3) days	Suspension for more than one (1) week but less than one (1) month	Discharge
6. Exhibition or distribution of pornographic materials including possession of the same in Company premises or jobsites.	Warning (Verbal or Written Reprimand)	Suspension for up to three (3) days	Suspension for up to one (1) week	Suspension for more than one (1) week but less than one (1) month

7. Engaging in illicit relationship with co-employee under scandalous circumstances, which may affect work performance; Scandalous acts or acts of immorality committed with a co-employee within Company premises or during Company-sponsored or organized activities, whether or not done within Company premises.	Suspension for one (1) to six (6) months	Discharge		
E. OFFENSES AGAINST SECURITY	1ST	2ND	3RD	4TH
1. Neglect use of ID or any other system of identification provided or required by the Company; or giving ID to any other person not entitled to it.	Warning (Verbal or Written Reprimand)	Suspension for up to three (3) days	Suspension for up to one (1) week	Suspension for more than one (1) week but less than one (1) month
2. Unauthorized possession of ice-picks, clubs, other deadly articles or bladed instruments such as hunting knife, balisong knife, "tres cantos", dagger etc., inside the premises of the company.	Suspension for one (1) to six (6) months	Discharge		
3. Illegal possession of explosives within the premises of the company.	Discharge			
4. Refusing to submit to Company authorized security personnel in the performance of their duties.	Warning (Verbal or Written Reprimand)	Suspension for up to one (1) week	Discharge	
5. Refusal to submit to or disobedience or failure to meet or observe security requirements or regulations of the Company.	Warning (Verbal or Written Reprimand)	Suspension for up to one (1) week	Discharge	
6. Engaging in sabotage; Sabotage or attempt to sabotage (Willful acts which adversely affect the operations of the Company) such as but not limited to: a. Spying or obtaining information from the organization confidential records or inducing others to spy or obtain information for the purpose of discrediting the organization and/or transmitting the same to others to the prejudice of the Company; b. Making false or malicious statements concerning the Company;	Discharge			

<p>c. Revealing or issuing, without authority, confidential information, data reports or similar documents, such as training manuals, concerning operations or trade secrets of the organizations with third parties;</p> <p>d. Committing any act that compromises the availability, integrity and security of Company or client systems or resources.</p>				
<p>7. Entering restricted areas without specific permission.</p>	<p>Warning (Verbal or Written Reprimand)</p>	<p>Suspension for up to one (1) week</p>	<p>Discharge</p>	
<p>8. Conviction of a crime or felony involving moral turpitude.</p>	<p>Discharge</p>			
<p>9. Unauthorized disclosure or giving away without authorization restricted Company information or other data of confidential nature to any person not authorized to acquire or possess such information or data.</p>	<p>Suspension for one (1) to six (6) months</p>	<p>Discharge</p>		
<p>10. Reporting for work obviously under the influence of liquor or dangerous drugs as listed under the Dangerous Drugs Act of 2002.</p>	<p>Suspension for one (1) to six (6) months</p>	<p>Discharge</p>		
<p>11. Bringing in or attempting to bring inside Company premises, property or jobsites, alcoholic beverages or any dangerous drugs.</p>	<p>Suspension for one (1) to six (6) months</p>	<p>Discharge</p>		
<p>12. Drinking any alcoholic beverage or use of dangerous drugs on Company premises.</p>	<p>Suspension for one (1) to six (6) months</p>	<p>Discharge</p>		
<p>F. OFFENSES RELATED TO ATTENDANCE OR WORK PERFORMANCE</p>	<p>1ST</p>	<p>2ND</p>	<p>3RD</p>	<p>4TH</p>
<p>1. Leaving work assignment during work hours without previous permission and without reasonable cause; Leaving or abandoning work assignment during official working hours or going on undertime without prior approval from the Immediate Supervisor/Manager;</p>	<p>Suspension for up to three (3) days</p>	<p>Suspension for up to one (1) week</p>	<p>Suspension for more than one (1) week but less than one (1) month</p>	<p>Discharge</p>

2. Failure to render overtime work without a valid reason after signifying willingness to perform authorized overtime work	Warning (Verbal or Written Reprimand)	Suspension for up to three (3) days	Suspension for up to one (1) week	Suspension for more than one (1) week but less than one (1) month
3. Engaging in horse-play; officiousness and noisy conduct disturbing the work of other employees.	Warning (Verbal or Written Reprimand)	Suspension for up to three (3) days	Suspension for up to one (1) week	Suspension for more than one (1) week but less than one (1) month
4. Wasting time or loitering on Company time.	Suspension for up to three (3) days	Suspension for up to one (1) week	Suspension for more than one (1) week but less than one (1) month	Discharge
5. Stopping work before indicated time-out.	Suspension for up to three (3) days	Suspension for up to one (1) week	Suspension for more than one (1) week but less than one (1) month	Discharge
6. Leaving Company premises or jobsite during working time without previous permission of supervisor.	Suspension for up to three (3) days	Suspension for up to one (1) week	Suspension for more than one (1) week but less than one (1) month	Discharge
7. Tardiness without reasonable cause in excess of sixty (60) minutes in any one month or five (5) times in one month.	Warning (Verbal or Written Reprimand)	Suspension for up to three (3) days	Suspension for up to one (1) week	Suspension for more than one (1) week but less than one (1) month
8. Absence without permission or without reasonable cause.	Warning (Verbal or Written Reprimand)	Suspension for up to three (3) days	Suspension for up to one (1) week	Suspension for more than one (1) week but less than one (1) month
9. Being absent for two consecutive days to one (1) week without permission or without officially filling leave of absence.	Suspension for up to one (1) week	Suspension for more than one (1) week but less than one (1) month	Suspension for one (1) to six (6) months	Discharge
10. Same as above if unauthorized absences exceed seven (7) consecutive days but not more than one (1) month	Suspension for one (1) to six (6) months	Discharge		

<p>Failure to return to work promptly upon expiration of vacation or sick leave shall be considered absence without leave. So that the reason justifying the absence may be considered in excusing the personnel concerned, the same must be received by or communicated to the proper authority within 24 hours from the first day of absence.</p>				
<p>11. Same as above if unauthorized absences exceed thirty (30) consecutive days.</p> <p>Note: The penalties for violation of Paragraph F, Item #7-10 shall be applied on a yearly basis reckoned on the immediately preceding 12 month period so that every year shall start with the penalty for the first offense.</p>	<p>Suspension for one (1) to six (6) months</p>			
<p>12. Doing private work during working hours without permission; Selling any kind of articles or lottery tickets, within the premises, without authorization of management.</p>	<p>Suspension for up to three (3) days</p>	<p>Suspension for up to one (1) week</p>	<p>Suspension for more than one (1) week but less than one (1) month</p>	<p>Discharge</p>
<p>13. Sleeping while on duty, in non-guarding or non- attending assignment.</p>	<p>Suspension for up to one (1) week</p>	<p>Suspension for more than one (1) week but less than one (1) month</p>	<p>Suspension for one (1) to six (6) months</p>	<p>Discharge</p>
<p>14. Sleeping while on duty causing damage to property or physical injuries.</p>	<p>Suspension for one (1) to six (6) months</p>	<p>Discharge</p>		
<p>15. Failure to wear the prescribed dress code</p>	<p>Warning (Verbal or Written Reprimand)</p>	<p>Suspension for up to three (3) days</p>	<p>Suspension for up to one (1) week</p>	<p>Suspension for more than one (1) week but less than one (1) month</p>
<p>16. Willful or negligent disregard for standard operating procedures or processes (including circulars, memoranda, etc.) established by the Company</p>	<p>Suspension for up to three (3) days</p>	<p>Suspension for up to one (1) week</p>	<p>Suspension for more than one (1) week but less than one (1) month</p>	<p>Suspension for one (1) to six (6) months</p>
<p>G. OFFENSES RELATED TO HEALTH AND SAFETY</p>	<p>1ST</p>	<p>2ND</p>	<p>3RD</p>	<p>4TH</p>

1. Creating, causing or contributing to unsanitary or disorderly conditions within Company premises	Warning (Verbal or Written Reprimand)	Suspension for up to three (3) days	Suspension for up to one (1) week	Suspension for more than one (1) week but less than one (1) month
2. Failure to participate in required emergency drills without justifiable reason	Warning (Verbal or Written Reprimand)	Suspension for up to three (3) days	Suspension for up to one (1) week	Suspension for more than one (1) week but less than one (1) month
3. Willful violation of safety/warning signs posted in the Company premises	Warning (Verbal or Written Reprimand)	Suspension for up to three (3) days	Suspension for up to one (1) week	Suspension for more than one (1) week but less than one (1) month
4. Smoking and use of electronic cigarettes inside Company premises	Warning (Verbal or Written Reprimand)	Suspension for up to three (3) days	Suspension for up to one (1) week	Suspension for more than one (1) week but less than one (1) month
5. Blocking emergency exits	Warning (Verbal or Written Reprimand)	Suspension for up to three (3) days	Suspension for up to one (1) week	Suspension for more than one (1) week but less than one (1) month
6. Submitting false reports and information related to the security and safety of the Company and/or its employees	Suspension for up to three (3) days	Suspension for more than one (1) week but less than one (1) month	Discharge	
7. Activating directly or indirectly the emergency alarm when there is no real emergency or tampering in any way with fire protection equipment or alarm system	Suspension for up to three (3) days	Suspension for up to one (1) week	Suspension for more than one (1) week but less than one (1) month	Discharge
8. Reporting to work knowing that he/she has a contagious disease (e.g. chickenpox, TB, sore eyes, Hepatitis) that could endanger the health of other associates or affect the operations of the department	Warning (Verbal or Written Reprimand)	Suspension for up to three (3) days	Suspension for up to one (1) week	Discharge

9. Forcing entry or gaining access or attempting to enter or gain access to an area in the Company premises in violation of instructions or rules restricting such access	Suspension for up to one (1) week	Suspension for more than one (1) week but less than one (1) month	Suspension for one (1) to six (6) months	
10. Refusal to submit Annual Physical Examination result	Warning (Verbal or Written Reprimand)	Suspension for one (1) to six (6) months	Discharge	
11. Refusal to submit to medical evaluation or get clearance/fit to work permit from the clinic despite the advice of the manager	Warning (Verbal or Written Reprimand)	Suspension for up to three (3) days	Suspension for more than one (1) week but less than one (1) month	
12. Being under the influence, or failure to pass the random drug test, or in possession of prohibited drugs or the selling thereof while in the Company premises or during Company-sponsored activities	Discharge			
H. OFFENSES RELATING TO MISBEHAVIOR/MISCONDUCT	1ST	2ND	3RD	4TH
1. Gross disobedience or deliberate refusal to obey reasonable and/or official instructions of superiors	Suspension for up to one (1) week	Suspension for more than one (1) week but less than one (1) month	Discharge	
2. Abuse of position and/or authority for personal gain or using position or authority to take advantage of, intimidate or harass co-employees	Suspension for up to one (1) week	Suspension for more than one (1) week but less than one (1) month	Suspension for one (1) to six (6) months	Discharge
3. Engaging in business or professional activity during working hours, or in any activity that goes against the interest of the Company regardless of whether the same is done during working hours or not.	Suspension for up to three (3) days	Suspension for more than one (1) week but less than one (1) month	Suspension for one (1) to six (6) months	Discharge
4. Writing for an outside publication, delivering outside lectures and attending speaking engagements without the prior consent of the Company.	Suspension for up to three (3) days	Suspension for more than one (1) week but less than one (1) month	Suspension for one (1) to six (6) months	Discharge

5. Participating in civic, political, religious, charitable, educational, cultural, recreational or other similar activities during Company time.	Suspension for up to three (3) days	Suspension for more than one (1) week but less than one (1) month	Suspension for one (1) to six (6) months	Discharge
6. Acceptance of gifts, favors, loans or other material benefits by the employee and/or member of his family from third persons (such as suppliers, and contractors) doing business or desiring to do business with the Company.	Suspension for up to three (3) days	Suspension for more than one (1) week but less than one (1) month	Suspension for one (1) to six (6) months	Discharge
7. Financial involvement in any transaction between the Company and third persons which affects or influences the official judgment of the employee.	Suspension for up to three (3) days	Suspension for more than one (1) week but less than one (1) month	Suspension for one (1) to six (6) months	Discharge
8. Engaging in the business of habitually lending money to employees. (Presuppose that the lending of money is with interest).	Suspension for up to three (3) days	Suspension for more than one (1) week but less than one (1) month	Suspension for one (1) to six (6) months	Discharge
9. Unjustified refusal to submit to an official investigation.	Suspension for more than one (1) week but less than one (1) month	Suspension for one (1) to six (6) months		
10. Offering, asking or accepting anything of value in exchange for a job, work assignment, work location, or favorable conditions of employment	Suspension for one (1) to six (6) months	Discharge		
11. Insubordination, refusing or neglecting to obey or to perform assigned work.	Suspension for one (1) to six (6) months	Discharge		
12. Coercing, bribing, inducing or condoning others to violate company policies, rules and regulations.	Suspension for one (1) to six (6) months	Discharge		
13. Failure to observe reasonable care and/or due diligence in the undertaking of a particular task in the course of the performance of duties which may result in serious customer dissatisfaction that may lead to loss to the Company in any form (e.g. imposition by the client of	Suspension for more than one (1) week but less than one (1) month	Suspension for one (1) to six (6) months	Discharge	

penalties/rebates, suspension of project, etc.), extensive delay in operations.				
14. Gross or habitual neglect by the employee of his/her duties; gross inefficiency or negligence in the performance of assigned tasks or duties.	Suspension for more than one (1) week but less than one (1) month	Discharge		
15. Discrimination against race, gender, religion, sexual orientation, physical disability, etc. in the form of verbal jokes or comments and written material, or in printed, digital or online formats	Suspension for one (1) to six (6) months	Discharge		
16. Bullying an Associate, client, contractor, or supplier by whatever means as the term bullying is defined under this Code of Conduct.	Suspension for more than one (1) week but less than one (1) month	Suspension for one (1) to six (6) months	Discharge	
17. Sexual harassment; engaging in acts of lasciviousness or any act which has sexual or lustful overtones, or those that can be characterized as prurient, done within Company premises or outside Company premises but during or in the course of Company- sponsored activities; an act in any form, verbal or otherwise, online or printed, is said to be prurient when it is marked by or arousing an immoderate, unwelcome or unwholesome interest or desire in or about sex	Discharge			
18. Final conviction of a crime or criminal offense under the laws of the Philippines	Discharge			
19. Provoking or instigating a fight within company premises or in the course of company-sponsored or organized events	Suspension for more than one (1) week but less than one (1) month	Suspension for one (1) to six (6) months	Discharge	
I. OFFENSES RELATING TO LEADERSHIP AND MANAGEMENT DECORUM	1ST	2ND	3RD	4TH

<p>1. Neglect of a responsibility related to a leadership function</p> <p>2. Abuse of authority related to a leadership function or in the course of performance of his/her duties;</p> <p>THIS OFFENSE MAY INCLUDE OBTAINING PERSONAL FAVORS OR LOANS FROM SUBORDINATES, OR EXERTING UNDUE INFLUENCE OVER, OR COERCING, A SUBORDINATE IN DOING AN ACT WHICH IS ILLEGAL, IMPROPER OR VIOLATIVE OF ANY COMPANY POLICY OR RULE</p>	<p>Suspension for more than one (1) week but less than one (1) month</p> <p>Suspension for more than one (1) week but less than one (1) month</p>	<p>Suspension for one (1) to six (6) months</p> <p>Suspension for one (1) to six (6) months</p>	<p>Discharge</p> <p>Discharge</p>	
<p>3. Making a decision that outs the Company in a compromising situation</p>	<p>Discharge</p>	<p>Discharge</p>	<p>Discharge</p>	
<p>J. OTHER OFFENSES</p>	<p>1ST</p>	<p>2ND</p>	<p>3RD</p>	<p>4TH</p>
<p>1. Any other acts analogous to any of the foregoing offenses</p>	<p>The imposable penalty will depend on the gravity of the offense and the analogous offense</p>			
<p>2. Any acts constituting any of the just causes enumerated under Article 282 of the Labor Code of the Philippines</p>	<p>Discharge</p>			