

CODE OF CONDUCT

EMPLOYEE HANDBOOK

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Welcome to Goldenfuture Life Plans, Inc. !

The following Rules shall serve as our guide on how we, the employees of **Goldenfuture Life Plans, Inc.** (“Company”) shall conduct ourselves in and out of the office in accordance with our corporate objective to preserve Company reputation, maintain high performance standards and observe superior ethical principles. In this light, we have laid down herein list of offenses that each employee must avoid, as well as its corresponding disciplinary action, for everyone’s reference.

For further clarification on the contents of this Code of Conduct (COC), feel free to reach out to your respective HR Business Partner, and they are more than willing to assist you.

We are pleased to have you as part of the Company. We hope that you continuously uphold our Corporate Values and the Tradition of Success that the Company is known for through proper behavior and business conduct.

HUMAN RESOURCES DEPARTMENT

I. DEFINITION OF TERMS

A. Employee

Refers to all probationary and regular employees who are directly hired, regardless of rank and position.

B. Company Time

Refers to the official time an employee is required to report for work, whether within or outside company premises. Company time also covers, but is not limited to:

- 1) Company-sponsored activities or events;
- 2) While acting as official representative/delegate of the Company; and,
- 3) While discharging one's duties and responsibilities.

C. Company Premises

Refers to the entire land area of the Company's establishment, vicinity and its extensions such as, but not limited to, shuttle service. It may also refer to the premises of the Company affiliates and subsidiaries when on official business or during company time.

D. Company Property

Refers to Company-owned or leased assets, infrastructures, furniture and fixtures, motor vehicles, office supplies, equipment, tools, machinery and the like.

E. Confidential Information

Also, herein referred to as "classified information"; refers to Company's trade secrets consisting of, but not limited to, technical information including methods, processes, formulae, compositions, systems, techniques, inventions, machines, computer programs and research projects, contracts and agreements, and business information, including customer lists, pricing and data, sources of supply, financial data and marketing, production, or merchandising plans.

F. Observation Period

Refers to the one (1) year period within which an employee should not commit another offense of similar category with respect to the previous offense committed; otherwise, the rules on progressive discipline shall apply.

II. GUIDELINES

A. Process Champions and their Responsibilities

- 1) **Department/Immediate Head** shall report to **Human Resources (HR)**, upon his discovery, or upon receipt of an incident report, any infraction or violation of the Company's COC. Any form of report shall be considered (e.g., sent via email, messaging apps, etc.). The Department Head/Immediate Head shall cause the issuance of a Notice to Explain.
- 2) **HR** shall investigate the alleged violation in compliance with the due process requirement under the law.

B. Due Process Requirement

All employees, prior to the administration of the corresponding disciplinary action for any offense, shall be afforded the following due process:

- 1) **Notice to Explain (NTE)** shall be issued promptly after preliminary assessment of the available facts and evidence.

The NTE shall contain the following information:

- a) Specific act or omission complained of and a detailed narration of the relevant facts and circumstances;
- b) Applicable Code of Conduct/Labor Code provision and possible disciplinary action;
- c) Opportunity given to the employee to submit written explanation t least five (5) calendar days from receipt of the NTE;
- d) Date and venue of administrative hearing, if necessary;
- e) Right to seek/bring counsel during administrative hearing; and,
- f) Notice of preventive suspension, if necessary.

NTE can be served through the following manner:

- a) Personal service;
- b) By email with confirmation of receipt by employee either through email, SMS, messaging apps or any similar means;
- c) By LBC to the last known registered address of the employee with proof of delivery and confirmation of receipt by employee; and,
- d) As last resort, by registered mail to the last known registered address of the employee.

In case the employee refuses to receive/sign the NTE being served, HR shall make a notation on the NTE with the following remarks *"Upon tender, employee refused to receive/sign."* HR shall ask two (2) witnesses to sign below the notation.

- 2) **Administrative Hearing** shall provide the alleged erring employee ample opportunity to explain his side and elaborate on his written explanation. The presence of the employee's Department/Immediate Head, and witnesses shall be required during the proceeding.

An Administrative Hearing shall be conducted when requested, when substantial evidentiary issues exist or when otherwise appropriate.

HR shall prepare the Minutes of the Administrative Hearing.

- 3) **Notice of Decision (NOD)** shall be issued to the employee concerned by the after evaluation of the records, the employee's written explanation and supporting evidence, if any, and after deliberation of the appropriate disciplinary action by the Discipline Committee and Legal.

The NOD shall state the findings, the offense established by the evidence, the applicable disciplinary action, if any, and the basis therefor. In cases involving dismissal, the NOD shall state that the circumstances of the case and the employee's explanation and evidence have been considered and that grounds have been established to justify the termination of employment.

The offense to be resolved in the NOD should be for which the employee may be held liable shall be limited to the offense or charge stated in the NTE, unless the evidence establishes a lesser offense carrying a lesser penalty. No new or graver offense shall be imposed as a basis for disciplinary action without first giving the employee notice thereof and a reasonable opportunity to explain..

Period of suspension must be on a continuous basis. It may only be on a staggered basis subject to operational exigencies and approval by the Management.

If the available evidence is insufficient to establish the commission of an offense by substantial evidence, the NOD must state so and accordingly absolve the employee of the charge.

HR is encouraged to close the entire administrative proceeding, starting from knowledge of violation up to issuance of a NOD within 20 working days. However, this may vary depending on the severity and/or complexity of the case.

In case the employee refuses to receive/sign the NOD being served, HR shall make a notation on the NOD with the following remarks "*Upon tender, employee refused to receive/sign.*" HR shall ask two (2) witnesses to sign below the notation.

Documentation of the entire proceeding i.e., incident report, written statements of witnesses, NTE, written explanation, Minutes of the Administrative Hearing, case report, NOD and other pertinent records must be kept and filed in the employee's 201.

C. Discipline Committee

For a fair and objective administration of disciplinary action provided under this COC, the Discipline Committee shall be composed of the following, as may be applicable:

- 1) Human Resources
- 2) Department/Immediate Head;
- 3) Internal Audit (only for cases with significant financial impact); and,
- 4) Legal (physical attendance is not required but shall review the recommendation of the Discipline Committee and issue its legal opinion).

III. PROGRESSIVE DISCIPLINE

Disciplinary Action shall be enforced in progressive or increasing manner, except for violations which may already merit the highest penalty of "Dismissal" for the First Offense.

A. Types of Disciplinary Action

1) Written Warning

This is the lightest form of Disciplinary Action and is merely a caution to the erring employee to be aware of the policies violated and to be warned that repetition of similar offense shall warrant a more serious disciplinary action.

2) Suspension

When continued violation of the same offense or a major violation occurs, an employee may be suspended from work starting from a minimum of three (3) working days to a maximum of ten (10) working days.

3) Dismissal

This may result from the repetitive commission of an offense, or the commission of a grave offense warranting imposition of the highest disciplinary action.

B. Preventive Suspension

1) Pre-requisite and Duration

Preventive suspension is not a disciplinary penalty and may be imposed pending investigation of an alleged violation. The Company may place an employee concerned under preventive suspension for a period not exceeding thirty (30) days without pay if his continued employment poses a serious and imminent threat to the life or property of the Company or his co-workers or when it is necessary to protect the integrity of an ongoing investigation.

2) Extension

Upon expiration of the thirty (30)-day period, the Company shall reinstate the employee to his former or a substantially equivalent position, or may extend the preventive suspension, provided that the employee shall be paid the wages and other benefits due to him during the period of extension. In such case, the employee shall not be bound to reimburse the amount paid to him during the extension if the Company decides, after completion of the hearing, to dismiss the employee.

C. General Principles in the Application of Disciplinary Action

Only one (1) disciplinary action shall be imposed per administrative proceeding, which may involve one (1) or more violations or offenses.

The Management shall determine the appropriate disciplinary action by taking into consideration the surrounding circumstances of each case, including the nature and gravity of the offense, the employee's degree of responsibility, prior disciplinary record, actual or potential damage, and any mitigating or aggravating circumstances, subject to due process, applicable law and the principle of proportionality. If the employee is found liable of two (2) or more violations arising from the same administrative proceeding, the disciplinary action corresponding to the most serious offense may be imposed, while the other established violations may be considered as aggravating circumstances.

1) Mitigating Circumstances

Mitigating Circumstances are situations or factors, which may either decrease the gravity of the offense committed and the applicable disciplinary action or offset the presence of aggravating circumstances, if any. Examples are as follows:

- a) First offense;
- b) Good faith;
- c) Due diligence and no intention to commit so grave a wrong;
- d) Good character or no derogatory record;
- e) Sufficient provocation, threat, coercion or inducement; and,
- f) Voluntary admission on a case-to-case basis.

2) Aggravating Circumstances

Aggravating circumstances are situations or factors that may increase the gravity of the offense committed and may result in a more serious or higher disciplinary action. Examples are as follows:

- a) Habitual;
- b) Abuse of confidence or authority;
- c) Evident premeditation;
- d) Malice or criminal intent; and,
- e) Disregard for authority.

3) Repetition of Infractions

A subsequent or repeated commission of the same or a related offense within the Observation Period may be considered as an aggravating circumstance and may result in the imposition of a higher disciplinary action, taking into account the totality of the circumstances and subject to due process and applicable law. Beyond the Observation Period, the previous offense shall no longer be used to escalate the penalty under the progressive discipline framework..

IV. LIST OF OFFENSES

A. Categories of Offenses

The list of offenses is categorized as follows:

- 1) Promoting Attendance and Office Presence;
- 2) Promoting Professional Conduct, Decorum and Work Standards;
- 3) Promoting Honesty and Integrity;
- 4) Protecting Company Property; and,
- 5) Ensuring Workplace Safety and Security.

B. Table of Offenses and Disciplinary Action

This section contains the list of offenses under each of the above-mentioned categories, coupled with the corresponding disciplinary action depending on the degree of severity and frequency. Management, at its sole discretion, may modify or adjust the applicable penalty in each case depending on the presence of mitigating or aggravating circumstances and other attendant factors.

1) Promoting Attendance and Office Presence					
Offenses	Disciplinary Action				
	1 st	2 nd	3 rd	4 th	5 th
1. Willful disregard to use mandatory timekeeping systems	Written Warning	3 Days Suspension	5 Days Suspension	10 Days Suspension	Dismissal
2. Incurrence of at least five (5) instances of tardiness/ unauthorized undertime/extended break time in one (1) calendar month.	Written Warning	3 Days Suspension	5 Days Suspension	10 Days Suspension	Dismissal
3. Unauthorized absence/ AWOL in one (1) calendar month:					
a. 1 day	Written Warning	3 Days Suspension	5 Days Suspension	10 Days Suspension	Dismissal
b. 2 to 5 days	3 Days Suspension	5 Days Suspension	10 Days Suspension	Dismissal	
c. 6 to 10 days	5 Days Suspension	10 Days Suspension	Dismissal		
d. More than 10 days	10 Days Suspension	Dismissal			
4. Unauthorized change in work schedule.	Written Warning	3 Days Suspension	5 Days Suspension	10 Days Suspension	Dismissal

5.	Loitering, loafing, malingering or wasting time during working hours, or using company time for personal purpose including supposed overtime work.	Written Warning	3 Days Suspension	5 Days Suspension	10 Days Suspension	Dismissal
6.	Sleeping while on duty.	Written Warning	3 Days Suspension	5 Days Suspension	10 Days Suspension	Dismissal
7.	Leaving work assignment or work place without permission from the immediate head.	Written Warning	3 Days Suspension	5 Days Suspension	10 Days Suspension	Dismissal

2) Promoting Professional Conduct, Decorum and Work Standards						
Offenses		Disciplinary Action				
		1st	2nd	3rd	4th	5th
1.	Failure to comply with the prescribed company dress code.	Written Warning	3 Days Suspension	5 Days Suspension	10 Days Suspension	Dismissal
2.	Solicitation or selling of any items or goods, or conducting any personal business within company premises or company time.	Written Warning	3 Days Suspension	5 Days Suspension	10 Days Suspension	Dismissal
3.	Engaging in horseplay, running, scuffling or behaving roughly within company time or company premises; or any form of disturbance resulting in disruption of company operations or company activity.	Written Warning	3 Days Suspension	5 Days Suspension	10 Days Suspension	Dismissal
4.	Discourtesy or rudeness in dealing with co-employees, superiors, and customers.	Written Warning	3 Days Suspension	5 Days Suspension	10 Days Suspension	Dismissal
5.	Conduct of indecent nature or use of profane or obscene language in addressing co-employees, superiors, and customers.	3 Days Suspension	5 Days Suspension	10 Days Suspension	Dismissal	
6.	Sending or forwarding of offensive, indecent, defamatory, or subversive materials and messages, e.g., pornography, articles promoting extreme violence or crime, grave threats, etc.	Written Warning	3 Days Suspension	5 Days Suspension	10 Days Suspension	Dismissal
7.	Conduct unbecoming of an employee and/or any act, which results in damage to the goodwill or reputation of the company.	3 Days Suspension	5 Days Suspension	10 Days Suspension	Dismissal	
8.	Insulting or maligning company's image and reputation, or using offensive or derogatory statements that will destroy the company's good name.	3 Days Suspension	5 Days Suspension	10 Days Suspension	Dismissal	

9. Threatening, intimidating, coercing, bullying/cyber-bullying, or harassing a co-employee, superior or customer.	5 Days Suspension	10 Days Suspension	Dismissal		
10. Fighting or instigating fight within Company premises or Company time.	5 Days Suspension	10 Days Suspension	Dismissal		
11. Inflicting bodily injury to others within Company premises or Company time.	5 Days Suspension	10 Days Suspension	Dismissal		
12. Insubordination					
a. Refusal to obey written work-related orders and instructions.	Written Warning	3 Days Suspension	5 Days Suspension	10 Days Suspension	Dismissal
b. Refusal without valid or justifiable reason, to render overtime work when lawfully required under circumstances where compulsory overtime is permitted by applicable law.	Written Warning	3 Days Suspension	5 Days Suspension	10 Days Suspension	Dismissal
c. Refusal, without valid or justifiable reason, to comply with a lawful and reasonable instruction to participate in an investigation authorized and conducted by the Company. .	Written Warning	3 Days Suspension	5 Days Suspension	10 Days Suspension	Dismissal
d. Refusal, without valid or justifiable reason, to comply with a lawful and reasonable transfer or reassignment made in the valid exercise of Management prerogative.	5 Days Suspension	10 Days Suspension	Dismissal		
e. Refusal, without valid or justifiable reason, to obey a lawful and reasonable work-related					

3) Promoting Honesty and Integrity					
Offenses	Disciplinary Action				
	1 st	2 nd	3 rd	4 th	5 th
1. Deliberately sharing Company identification material or passwords to any individual not entitled to it.	3 Days Suspension	5 Days Suspension	10 Days Suspension	Dismissal	
2. Unauthorized use of other employee's password and/or email account.	3 Days Suspension	5 Days Suspension	10 Days Suspension	Dismissal	
3. Feigning illness to avoid work schedule or job assignment.	3 Days Suspension	5 Days Suspension	10 Days Suspension	Dismissal	
4. Unauthorized access to or copying of confidential information.	3 Days Suspension	5 Days Suspension	10 Days Suspension	Dismissal	
5. Manipulating process or system settings to gain unauthorized access to any network or server for business or non-business reasons.	5 Days Suspension	10 Days Suspension	Dismissal		

6. Deliberate disregard to report any losses or breakages incurred by the Company.	3 Days Suspension	5 Days Suspension	10 Days Suspension	Dismissal	
7. Deliberate concealing of any information or documents.	3 Days Suspension	5 Days Suspension	10 Days Suspension	Dismissal	
8. Giving false narration of facts, answer or any kind of statement in memorandum, report or other inter-office communications or in any inquiry or investigation conducted by the Company.	3 Days Suspension	5 Days Suspension	10 Days Suspension	Dismissal	
9. Deliberate submission of fraudulent reports and documents or falsification of any kind.	Dismissal				
10. Deliberate submission of fraudulent money claims.	Dismissal				
11. Forging signatures of Company signatories or clients, or falsely representing the Company or clients in any document.	Dismissal				
12. Impersonation or false representation of an individual or group with respect to their functional responsibilities and jurisdiction, e.g., unauthorized use of username and password.	Dismissal				

13. Offering, soliciting or accepting anything of value for personal gain or in exchange for a favorable working condition of employment (work assignment, work location, etc.).	Dismissal				
14. Disclosing, leaking out or revealing confidential information and documents, Company strategy, technique, method or trade secrets to unauthorized employees or third parties. This is also a violation of <i>R.A. No. 10173, otherwise known as the Data Privacy Act of 2012</i> .	Dismissal				
15. Undermining network management, including hacking and/or spreading of destructive/infectious executable programs, e.g., attempts to penetrate/disable/destroy the Company's security system, thus making it vulnerable to damages.	Dismissal				
16. Acts of disloyalty – Contracting work in competition with the Company or engaging in activities whether commercial or political, in conflict of interest with the Company; or rendering service to a business rival.	Dismissal				
17. Violation of intellectual property rights laws, e.g., use, installation, and/or illegal reproduction or distribution of unlicensed software/applications.*	Dismissal				
18. Any other forms of dishonesty, fraud or deceit committed against the Company, co-employees or customers.	Dismissal				

4) Protecting Company Property					
Offenses	Disciplinary Action				
	1 st	2 nd	3 rd	4 th	5 th

1. Improper or unauthorized use of Company property, assets, resources and work tools, including the improper use of Company email and internet (e.g., browsing and downloading games portal, social networking sites and advertisements or pornographic websites) for non-business-related matters or for personal or commercial gain.	Written Warning	3 Days Suspension	5 Days Suspension	10 Days Suspension	Dismissal
2. Unauthorized posting or removal of any matter on bulletin boards or Company property.	Written Warning	3 Days Suspension	5 Days Suspension	10 Days Suspension	Dismissal
3. Losing or misplacing of Company assets, records or documents.	Written Warning	3 Days Suspension	5 Days Suspension	10 Days Suspension	Dismissal
4. Failure to report any defect or damage on Company property or assets within 24 hours from knowledge, which prevents the Company from immediately attending to/repairing said defect or damage.	Written Warning	3 Days Suspension	5 Days Suspension	10 Days Suspension	Dismissal
5. Deliberately damaging Company property (including company-owned communication tool and hardware e.g., desktop, laptop, printer, etc.) or property of co-employees or customers.	5 Days Suspension	10 Days Suspension	Dismissal		
6. Theft or pilferage of Company money or property.	Dismissal				
7. Substituting or attempting to substitute Company property, assets or resources.	Dismissal				
8. Obtaining or attempting to obtain materials with the use of fraudulent purchase orders or falsified letters, memoranda or other authorization.	Dismissal				

5) Ensuring Workplace Safety and Security					
Offenses	Disciplinary Action				
	1 st	2 nd	3 rd	4 th	5 th
1. Failure to follow the safety, security, health and environment requirements of the Company.	Written Warning	3 Days Suspension	5 Days Suspension	10 Days Suspension	Dismissal
a. If failure results in damages/losses to the Company	5 Days Suspension	10 Days Suspension	Dismissal		
b. If failure results in serious/substantial damages/losses to the Company	Dismissal				

2.	Creating or contributing to unsanitary condition or violating rules on health and sanitation.	Written Warning	3 Days Suspension	5 Days Suspension	10 Days Suspension	Dismissal
3.	Failure to follow medical advice of Medical Services to submit to a medical check-up/laboratory test for confirmation/verification of any claim of illness, which may endanger the life and health of his co-employees.	5 Days Suspension	10 Days Suspension	Dismissal		
4.	Failure to immediately report an incident/accident involving the safety, security or health of an employee.	3 Days Suspension	5 Days Suspension	10 Days Suspension	Dismissal	
5.	Unauthorized entry to or exit from restricted or off-limit areas.	Written Warning	3 Days Suspension	5 Days Suspension	10 Days Suspension	Dismissal
6.	Allowing or failure to report unauthorized person entering Company's restricted or off-limit areas.	Written Warning	3 Days Suspension	5 Days Suspension	10 Days Suspension	Dismissal
7.	Smoking in prohibited areas.	Written Warning	3 Days Suspension	5 Days Suspension	10 Days Suspension	Dismissal
8.	Unauthorized carrying of any deadly weapon within Company premises or during Company time.	Written Warning	3 Days Suspension	5 Days Suspension	10 Days Suspension	Dismissal

C. Habitual Delinquency

Commission of any twelve (12) offenses within one-year period shall warrant dismissal from the Company.

Commission of any six (6) offenses punishable by suspension within one-year period shall also warrant dismissal from the Company.

D. Whistleblowing

The Company promotes a culture of accountability, integrity and prudence in implementing this Code of Conduct.

Whistleblowing refers to the disclosure of information relating to an incident involving the Company and its employees, with reasonable belief that the same is true, and made without malice and in good faith. These may include information that pertain to:

- Violation of any law, rule, regulation or policy;
- Gross mismanagement;
- Abuse of authority;
- Threat to public interest and policy (e.g., safety and security, damage to company brand, etc.);
- Conflict of interest, grossly unethical practices and misconduct; and,
- Other similar information.

Reservation Clause

Other rules and regulations in the form of Company policies, procedures, guidelines and memorandum may be promulgated from time to time as circumstances would warrant. Likewise, any act or omission not covered by the provisions enumerated herein, which warrants implementation of a disciplinary action shall be dealt with by the Management through reference to the same provisions by analogy. Further, the Management reserves the right to modify or amend the foregoing provisions and the corresponding disciplinary action, if such would be for the best interest of the Company and its employees.

The Management also reserves the right to file the appropriate criminal or civil action against any erring employee aside from the administrative action taken against him.

Effectivity

This Code of Conduct shall take effect immediately with all affected provisions amended accordingly.

Acknowledgement

☐ By clicking this box, I acknowledge that I have accessed, read and understood the foregoing contents of the new Code of Conduct; and hereby warrant adherence to the provisions thereof and that I am fully aware of the consequences and implications of non-compliance therewith.