

ATR KIMENG GROUP

**EMPLOYEE HANDBOOK
AND CODE OF STANDARDS**

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I. INTRODUCTION

The ATR KimEng Group (“the Group” or “the Company”) is committed to delivering high quality and value-added products and services to clients through its subsidiaries and affiliates. As a diversified financial services organization, this is the surest, if not the only, way for us to effectively compete in our markets and at the same time enhance shareholder value. The Group believes that maintaining a high degree of professionalism, integrity and business ethics on the part of each employee is key to achieving this mission.

In order to ensure efficiency of operations, safeguard the reputation and other assets of the Group, set standards for job performance, and foster teamwork and mutual respect in the workplace, the Group has adopted policies, procedures and guidelines covering all aspects of its business operations. Employees are expected to read, familiarize themselves and adhere to these policies and guidelines.

This Employee Handbook and Code of Standards (“Employee Handbook”) explains what employees can expect of the Group in terms of employment benefits and conditions. It also sets out the expectations of the Group of its employees in respect of standards of behavior and adherence to corporate policies, guidelines and procedures. As violations of Group standards and policies may warrant disciplinary sanctions, such is also covered in this document.

II. OBJECTIVES

This Employee Handbook is designed to achieve the following objectives:

- To provide employees with a clear understanding of employee benefits, employment conditions, and HR policies and procedures;
- For employees to develop individual responsibility and respect towards co-workers, work and Company property;
- To create a working atmosphere where all employees are treated with respect and dignity, and work together as a team;
- To define what constitutes offenses, and to establish corresponding sanctions and administrative procedures for the enforcement of sanctions.

III. COVERAGE

This Employee Handbook explains the Group's employment conditions and benefits, and HR policies and procedures. It also sets out the essential guidelines of conduct for all employees of the Group in the performance of their duties and functions. These guidelines are not intended to be exclusive and the Group may, from time to time, amend, alter, modify, or change them as it may deem appropriate to meet the objectives enumerated above.

This document does not contain the entirety of the Group's policies, procedures and guidelines as individual functions (e.g., Group Compliance, Group Risk) and individual businesses within the Group do issue bespoke policies and guidelines. Every employee is expected to read and be familiar with all policies and guidelines applicable to his/her function and comply therewith. Non-compliance with Group policies, procedures and guidelines may result in disciplinary actions as described in this Employee Handbook.

The provisions of this Employee Handbook shall apply to all employees of the Group regardless of status, rank or position, except for specific provisions which Group management may deem applicable only to certain ranks or positions.

IV. EMPLOYMENT

A. Employment Status

Employees are classified as probationary, regular, or contractual as explained below. Regardless of employment status, every employee of the Group is expected to abide by the highest standards of conduct and to demonstrate honesty, professionalism, integrity and business ethics.

1. Probationary

Every employee undergoes a set of selection procedures prior to hiring and, unless expressly waived by senior management, a standard probationary period of six (6) months. The employee's performance during the probationary period will be reviewed and if warranted, the employee may be converted to regular status. A probationary employee may be terminated at anytime for unsatisfactory performance and in accordance with the Labor Code.

2. Regular or Permanent

An employee who has satisfactorily passed the 6-month probationary period will be converted to regular status. Certain employees, by virtue of the positions they occupy, may be hired as regular employees at the outset and not undergo probationary stage.

3. Temporary or Contractual

Employees may be hired for a specific project or for a limited period of time, such as temporary replacement for regular employees on leave. The period of temporary employment will generally not be counted towards the probationary period should an employee under contract be considered for permanent employment.

B. Consultant

A consultant is a person possessing high level qualifications whose services are contracted by the Company for a specific project or undertaking which requires a high degree of expertise not readily available from within the Company. No employer-employee relationship exists between a consultant and the Company and thus, consultants are not covered by the benefits described in this Employee Handbook. Nonetheless, consultants are expected to abide the highest standards of conduct, professionalism and ethics which the Group expects of its own employees.

C. Performance Appraisal and Promotion

Promotion to a higher position and increases in compensation are strictly merit-based. For this purpose, the performance of every employee will be appraised by his or her immediate supervisor annually using performance standards and appraisal discussions applicable to individual companies in the Group.

Other factors such as educational attainment, experience, seniority and adherence to company policies (including but not limited to observance of work schedules) are also considered when evaluating an employee for promotion and increase in compensation.

D. Resignation

The Group requires prior notice of thirty (30) calendar days from employees who intend to resign. An employee who holds a sensitive position may be required not to report for work while serving the 30-day notice period. During this period, such an employee, being still in the employ of the Group, may not be employed in another company and must be available for meetings and consultations if required.¹

¹ Please also note that under existing rules of the Philippine Stock Exchange ("PSE"), certain employees of a Group entity which is a member of the PSE who resign or are terminated cannot be employed by another member of the PSE until after six (6) months from the date of resignation or termination.

E. Dismissal for Just Cause

If an employee is dismissed or discharged for just cause, he/she will not be entitled to receive any benefits from the Company other than his current compensation/salary which is due to him/her. In addition, the Company reserves the right to file legal action against the employee as may be appropriate.

V. COMPENSATION AND BENEFITS

A. Compensation

In line with its desire to attract and retain the best employees, the Group's salary scales are competitive with industry standards. Compensation is also a function of the employee's experience, job performance, functional responsibility and adherence to Group policies and standards including those related to observance of work schedules. (See previous section on "Performance Appraisal and Promotions".)

As mandated by law, a 13th month pay is paid to all employees during December of each year.

At the discretion of senior management and the Board of Directors of the individual companies in the Group, performance bonus and/ or annual bonus may also be given to employees taking into account the employee's overall performance and the financial result of the individual company.

B. Benefits

The Group offers employee benefits which are competitive with industry standards, including the following:

1. Leave Benefits

These include vacation leaves, sick leaves, maternity and paternity leaves, and emergency leaves. Employees in financially-sensitive positions (e.g., those handling cash) are required to take vacation leave lasting at least five (5) continuous working days per year.

2. Hospitalization and Medical Benefits

3. Retirement Benefits

Retirement benefits are generally based upon the age of the employee and the number of years of continuous service in the Group.

As individual companies in the Group have different benefit programs, employees should consult with their HR Department for the benefits that apply to them. It should be noted that at a minimum, all companies in the Group comply with all the requirements of the Labor Code in respect of employee benefits.

VI. WORK SCHEDULE

A. Regular Work Days and Hours

Regular work days are Monday to Friday, generally from 8:30 a.m. to 5:30 p.m. with a lunch break of one (1) hour and a coffee break of fifteen (15) minutes each in the morning and in the afternoon.

The management of each Group company may vary the work schedule to fit business requirements as long as total number of hours per day does not exceed eight (8) hours.

B. Tardiness/Undertime

A 15-minute grace period shall be allowed in the morning and tardiness will be reckoned after this grace period. At the discretion of the supervisor, tardiness may be subject to salary deduction and repeated tardiness may be subject to disciplinary sanctions.

An employee will be considered on undertime when he leaves work two (2) hours or less before the end of office hours. Leaving work earlier shall be considered an absence for the period. It is important that the employee obtains the approval of his/her supervisor prior to leaving work early. Only approved undertime shall be deducted from an employee's leave credit (or from salary if he/she no longer has any unused leave credits). Unauthorized undertime will be without pay and may be subject to disciplinary sanctions.

C. Absences

An employee who did not file a leave but could not report for work must inform his/her immediate supervisor or HR Department as early as possible during the day via telephone, e-mail or SMS message, or have someone do it if he/she is not in a position to do so. This is to make sure that the supervisor could make arrangements for someone to perform the absent employee's tasks.

Absence from work because of emergency situations may be excused in the following cases:

- when the employee is sick;
- family emergency, e.g., when an immediate relative is sick and the employee's presence is needed, death in the immediate family;
- when an employee has to attend to pressing personal matters (in which case the emergency leave entitlement could be used).

An employee who has been sick for more than three (3) days must present a medical certificate to HR Department upon his/her return stating the detail of the ailment. If the absence due to illness is ten (10) days or more, the medical certificate should, in addition, state that the employee is now fit to go back to work. The Company reserves the right to require the employee concerned to undergo a medical check-up by an accredited medical practitioner in cases of prolonged illness.

An employee who goes on leave without filing the necessary leave form, or without notifying his/her immediate supervisor or HR, or who goes on leave when his leave application has been disapproved shall be considered absent without leave (AWOL) and may be subject to disciplinary sanction.

D. Overtime Work

Overtime work with pay only applies to certain employee levels, generally rank and file and supervisory employees. No overtime work shall be rendered without the prior approval of the Department Head.

No overtime pay shall be allowed to employees who:

- comes in late or reports undertime;
- works overtime on a Saturday and/or Sunday but was absent the previous Friday;
- works overtime on a holiday but was absent the previous working day

Employees should consult with their HR Department for the overtime pay scale that applies to them as individual companies in the Group may have different computations of overtime remuneration.

Overtime pay shall be credited on the succeeding payroll date of the Company.

VII. STANDARDS OF CONDUCT

A. Integrity and Responsibility

Integrity and responsibility are among the core values of the ATR Kim Eng Group and are prerequisites to offering clients high quality financial products and services.

Employees are expected to observe honesty in the performance of their work, especially in handling Company funds and properties, and to consider the implications of their conduct, inside and outside the workplace, to the reputation of the Group.

Every effort should be made to meet commitments made to clients and co-workers, especially in respect of prompt delivery of products and services.

1. Conflicts of Interest²

Conflicts of interest situations should be proactively identified and managed so that both the appearance of, and actual, improprieties could be avoided.

Employees must ensure that their personal securities trading and investment activities are conducted in compliance with Group policies applicable to their positions.

The Group recognizes and respects the right of employees to engage in lawful activities outside of work (e.g., directorships in other companies, secondary occupations, involvement in civic activities). However, those must be disclosed pre-fact to the employee's supervisor for review. Employees with external affiliations must also ensure that time devoted to such activity does not interfere with their duties and responsibilities to the Group, and does not involve Group resources. Where the organization the employee is affiliated with is an ATR KimEng client, he/she should recuse himself/herself from any business deliberations or decisions involving such organization.

Business must be conducted in such a manner that makes it clear to clients and suppliers that one is not seeking favors. Solicitations of any kind from clients and suppliers for the personal benefit of employees or their families are strictly prohibited. Group policy on gifts and entertainment must be complied with.

2. Handling of Confidential and Proprietary Information

Employees must keep in strict confidence any non-public information that they may acquire concerning the Company and its clients during the course of their employment. They should not divulge or use for any purpose such Company and client information even after their employment with the Group ceases.

E-mails should be sent on a "need to know" basis, i.e., only to persons to whom the communication is relevant. The standard confidentiality notice and disclaimer should be added at the end of each e-mail, especially those sent to third parties.

Making copies of any Company documents, whether in paper or electronic form, or forwarding them via e-mail to outside addresses without valid business reason is strictly prohibited. Employees must be able to satisfactorily account for all documents, manuals and materials entrusted to them.

3. Communication and Openness

² This section should be read in conjunction with Group Risk Policy No. 10-01 on "Managing Conflicts of Interest".

Openness is another core value of the ATR KimEng Group. This essentially means transparency and honesty in dealing with each other. Open communications with management through immediate superiors should always be maintained.

Employees are required to cooperate in any investigation or audit that the Company or any regulator may conduct. As a member of the ATR KimEng community, everyone also has an obligation to immediately report to his/her supervisor any event or information which may negatively affect the Group's reputation or interest, or result in financial loss or regulatory sanctions.³

Each employee is required to inform HR Department of any changes in his/her personal circumstances and of other relevant personal information which may affect employee benefits and other HR actions.

B. Work Discipline

Employees should be conscious that the success of our business is anchored on professionalism, competence and the provision of dependable service to clients. It is therefore the duty of every employee to perform his or her assigned work diligently and in accordance with the standards set out in this Employee Manual, as well as established work ethics and Group policies and procedures.

Employees are expected to observe rules of orderly conduct and proper decorum, show consideration for the rights of others, treat fellow workers with respect and dignity, and accept the consequences of their actions.

1. Efficient and Courteous Service to Clients

Showing utmost courtesy and dealing efficiently with clients, especially in respect of responding to queries, are of paramount importance. Matters which require another employee's expertise must be immediately relayed for prompt disposition.

Telephone calls should be answered promptly and, if the responder is not the correct party, the call must be transferred immediately to the proper party. Care must be taken so that a caller is not transferred needlessly from one party to another.

2. Use of I.T. Systems and Other Company Property⁴

The following guidelines must be observed in the use of the Group's computer systems and other properties:

- The Group's internet, e-mail and telephone systems are for business use. Although the use of these facilities is allowed for reasonable personal use, such should be kept to a minimum.
- Unlicensed software must not be downloaded or installed onto the Group's computer systems. Likewise, external portable devices (e.g., USB, CD) must not be connected to the Group network without pre-fact approval from IT Department.
- Extreme caution must be observed when opening e-mail attachments from unknown senders as such may contain viruses.
- Work areas should be kept neat and orderly. Confidential documents must be kept under lock and key at the end of each working day.

³ Please refer to Group Risk Policy No. 10-01 on "Material Incident Reporting and Management".

⁴ This section should be read in conjunction with the "Group Information and Technology Management Manual", and Group Risk Policy No. 10-02 on "Electronic Communication and I. T. Security".

- Personal visitors should be entertained only during break time or after office hours and, for employees who do not have individual rooms, only at designated meeting rooms.
- Office supplies and stationery are strictly for business use.
- Office equipment should be cared for properly. Electrical equipment should be unplugged and computers logged off at the end of each working day. Extra care must be taken to ensure the security of company-owned handheld and portable computer devices as their loss could compromise confidential information.
- Damage to Company property should be immediately reported whether or not one was responsible for the damage.

3. Proper Conduct and Work Relationships

Proper conduct and behavior in the workplace is a hallmark of professionalism. All employees are expected to adhere to the following basic guidelines:

- Fellow workers must be treated with respect and dignity. Harassment in any form will not be tolerated.
- Borrowing money from fellow workers, especially from one's subordinate, and asking a fellow worker to guarantee one's obligation must be avoided.
- Pornographic materials should not be brought to the workplace. This includes logging onto such internet websites. Books, magazines, periodicals and other printed materials other than those related to Company business should not be read during office hours.
- Group premises are a smoke-free environment. The Group's no smoking policy must be observed at all times.
- Drinking any alcoholic beverage inside Company premises, or reporting to work under the influence of alcohol, is prohibited except during social functions held inside the premises.
- Bringing controlled / prohibited substances inside Company premises, or reporting to work under their influence, is strictly prohibited.
- Bringing firearms and other deadly weapons inside Company premises is strictly prohibited (except for security personnel who are authorized to do so).
- Selling of any merchandise and/or solicitation of any kind, as well as gambling in any form inside the workplace is prohibited.

4. Office Attire

Employees are required to report for work in proper business attire befitting their position or job function. Although Fridays are "dress down" days, appropriate dress code should nonetheless be observed.

Female employees are not allowed to wear shorts, micro-mini skirts, denims, tight-fitting blouses with plunging neckline, sleeveless blouses, sneakers and clogs into the workplace during work days. Male employees, on the other hand, are not allowed to wear shorts, shirts without collar, sneakers, slippers and sandals during work days.

Rank and file employees up to supervisory level are required to wear Company uniforms during regular work days except on Fridays, which are "dress down" days. Employees are expected to take proper care of their uniforms. Lost or damaged uniforms should be reported to HR Department so replacements could be arranged. The cost of the lost or damaged uniform shall be charged to the employee concerned. Company uniforms, being Company property, should not be used outside work premises during non-working days. Resigning employees must return their uniforms to HR Department on their last working day.

VIII. OFFENSES AND DISCIPLINARY ACTIONS

The Group assumes that every employee is a responsible member of the ATR Kim Eng community. Disciplinary sanctions are generally used only as a last resort and are imposed to provide the employee concerned with a full understanding of the seriousness of the violation and thereby deter similar incidents, and to ensure that the high standards of professionalism of the Group are maintained. The Group adopts a progressive method of sanction in order to give the employee concerned every opportunity to correct his or her deficiencies. There is also a prescription period after which any record of the offense will be removed from the employee's file in order to give him or her the opportunity to have a new start.

A. Disciplinary Measures

The degree of disciplinary measure for a given infraction is based on the relative gravity of the offense, and the injury that the offense has caused or may cause to the interest of the Group or to the welfare of other employees

Should financial loss result from the infraction, the employee concerned may be held responsible for the restitution of the loss in addition to the prescribed penalties. For attendance-related offenses, salary deductions commensurate with the resulting loss to the Group may be imposed. Restitution and salary deduction are distinct and separate obligations of the employee and shall in no way mitigate the appropriate penalty for the infraction.

Annex A sets out a listing of infractions usually committed in the workplace along with the corresponding disciplinary sanctions. The listing is by no means complete (as it is not possible to anticipate all infractions that might occur). Management has the discretion to impose sanctions for offenses not listed in Annex B.

Below are the penalties that may be imposed for violation of Group policies and guidelines:

WW	Written Warning
WR	Written Reprimand
S(3)	Suspension for up to 3 days
S(5)	Suspension for up to 5 days
S(15)	Suspension for up to 15 days
S(30)	Suspension for up to 30 days
D	Dismissal

B. Implementation of Disciplinary Sanctions

The following procedures shall be followed in the implementation of disciplinary sanctions:

1. Timeliness of Penalties

Upon completion of the investigation procedures set out in the next section and if warranted by evidence, disciplinary action or penalty shall be imposed immediately.

2. Uniformity of Penalties

The same disciplinary sanction or penalty shall be applied to offenders of the same offense committed under similar facts or circumstances regardless of rank or position of the employee concerned.

Anyone who forces or induces another employee to commit an offense, or who aids and abets the commission of an offense shall be subject to the same penalty as if he or she committed the offense.

An attempt to commit an offense even if unsuccessful may subject the employee to the same penalty as if the action was consummated.

3. Single Penalty for One Offense

Only one penalty shall be imposed for one offense. However, when a single act constitutes more than one infraction, the penalty for the most serious offense shall be imposed.

4. Repeated Commission of Offenses/Progressive Sanction

Repeated commission of offenses shall subject the employee concerned to a progressive scale of sanctions as set out in Annex B. The reckoning period for a higher degree of sanction is any 12-month period.

5. Prescription Period

Except for dismissal, the offense and the disciplinary action/penalty imposed on an employee shall be expunged from his / her personnel record after a prescription period shown below. This is in order to give the employee concerned a fresh start with the Group.

- Written Warning One (1) year from date of the written reprimand
- Written Reprimand Two (2) years from the date of written warning
- Suspension Five (5) years from the last day of the last suspension

6. Preventive Suspension

Management may place an employee on preventive suspension of not more than thirty (30) days without pay if in their judgment his or her continued presence in the workplace poses a serious threat to the well-being of other employees or to the property of the Company.

If, upon the expiration of the preventive suspension period, management still deems it necessary that the employee should not report back to work and no final decision has been reached yet, he or she will be placed on forced leave with pay.

C. Procedures in Administrative Investigation

To expedite the resolution of administrative cases and in order to establish a set of uniform procedures in investigating employee infractions, the following shall be observed to ensure that all investigations and disciplinary actions are properly investigated and documented.

1. Upon discovery of an infraction, the immediate supervisor of the employee concerned shall require the employee to execute a written narration of the circumstances and events surrounding the infraction in his/her own handwriting, or if unable or unwilling to do so, require the employee to acknowledge in writing a narration prepared by the supervisor based on his/her interview with the employee. This should be done and the written narration of events submitted to HR Department as soon as possible.
2. A written notice shall be served to the employee concerned advising him of the charges against him/her and requiring him/her to explain in writing why no disciplinary action should be taken against him/her. The employee shall be given no less than forty eight (48) hours to prepare and submit his/her explanation and/or supporting evidence regarding the alleged infraction.

3. Upon receipt of the employee's explanation, the HR Department Head shall evaluate the same, interviewing the employees and other parties as he/she may deem necessary. Penalties up to and including Written Reprimand (WR) may be imposed by the HR Department after advising the employee's supervisor and Department Head. Penalties that involve suspension or dismissal must be referred to Legal / Compliance Department for further investigation.
4. If, upon completion of its investigation, Legal / Compliance agrees that the offense committed by the employee is punishable by suspension or dismissal, the case will be referred to the the HR Committee for requisite action.⁵
5. The HR Committee may convene a formal hearing of the case before coming up with its final decision. Hearing is mandatory if the employee's offense is punishable by dismissal.
6. The HR Committee shall immediately notify the employee in writing of its decision stating the reasons therefor. The decision of the HR Committee shall be final and executory.

⁵ Members of the HR Committee shall be designated by the President / CEO of each company in the Group with himself/herself as Chair.

ANNEX A

A. Infractions Related to Improper Observance of Work Schedule

	1 st Offense	2 nd Offense	3 rd Offense	4 th Offense	5 th Offense	6 th Offense
1. Failure to immediately notify immediate supervisor or HRD of any absences	WW	WR	S(3)	S(5)	S(15)	D
2. Absences from work without proper notification or official leave	WW	WR	S(3)	D		
3. Coming to work late						
a. for at least 6 times or a cumulative tardiness of 60 minutes within a month, whichever comes first	WW	WR	S(3)	S(5)	S(15)	D
b. for at least 12 times or a cumulative tardiness of 120 minutes within a month, whichever comes first	WR	S(3)	S(5)	S(15)	D	
c. for at least 18 times in a month or a cumulative tardiness of 180 minutes within a month, whichever comes first	S(3)	S(5)	S(15)	D		

B. Infractions Related to Lack of Integrity and Responsibility

	1 st Offense	2 nd Offense	3 rd Offense	4 th Offense	5 th Offense
1. Deliberate neglect or refusal to obey oral or written legitimate orders.	WR	WW	S(3)	S(5)	D
2. Non-compliance with policy on personal securities trading:					
a. engaging in short term trades	WR	S(3)	S(5)	D	
b. using material inside information	S(5)	D			
c. failure to observe black out trading periods	S(5)	D			
3. Failure to disclose external affiliations that may give rise to conflicts of interest	WR	S(3)	D		
4. Actively pursuing interests that conflict or appear to conflict with one's duties as an employee of the Company	WR	S(3)	D		
5. Divulging confidential Company or client information to third parties	D				
6. Failure to report information or an event known to employee which could cause financial or reputational damage to the Group.	WR	S(3)	S(5)	D	
7. Failure to cooperate in an audit or investigation being conducted or authorized to be conducted by Group.	WR	S(3)	D		
8. Failure to inform the Company of any change in one's employment records	WW	S(3)	S(5)	D	
9. Falsification of any document	D				

C. Infractions Related to Lack of / Improper Work Discipline

	1 st Offense	2 nd Offense	3 rd Offense	4 th Offense	5 th Offense	6 th Offense
1. Engaging in activities unrelated to Company business during office hours	WW	WR	S(3)	S(5)	D	
2. Failure to attend promptly to a client and/or discourteous conduct towards a client without justifiable reason	WR	WW	S(3)	S(5)	D	
3. Concealment of erroneous work which may result in loss or other adverse impact to the Company	WR	S(I)	S(3)	S(5)	D	
4. Failure to account for all Company assets and/or other documents entrusted to him/her:						
a. upon spot check	WW	WR	S(5)	D		
b. despite repeated demand	WW	S(3)	S(5)	D		
c. resulting in loss or impairment to the reputation of the Group.	S(5)	D				
5. Giving erroneous information to a client jeopardizing Group reputation.	WW	WR	S(3)	S(5)	D	
6. Refusing to work overtime when required	WW	WR	S(3)	S(5)	D	
7. Failure to keep confidential materials, information or documents in designated storage.	WW	WR	S(3)	S(5)	D	
8. Intermediating in behalf of a client or any other persons in transactions unrelated to one's official duties.	WR	S(3)	S(5)	D		
9. Failure to consult the proper Company authority on matters beyond one's authority	WR	S(3)	S(5)	D		
10. Deliberate withholding of information from, knowingly providing false information to, and/or otherwise misleading management.	WR	S(3)	S(5)	D		
11. Failure to wear prescribed office uniform	WW	WR	S(3)	S(5)	S(15)	D
12. Altering prescribed uniform without permission from management	WW	WR	S(3)	S(5)	S(15)	D
13. Downloading or installing unlicensed software into Company IT system	S(10)	D				
14. Using company equipment, vehicle, property or material to perform or create something for personal gain or purpose or illegal and immoral purposes	S(3)	S(5)	S(15)	D		
15. Malingering or leaving work without prior notification to immediate supervisor.	WW	WR	S(3)	S(5)	S(15)	D

16. Causing disturbance or disharmony by acting in a deliberate, indecent manner	WW	WR	S(3)	S(5)	D	
17. Smoking, except in designated areas.	WW	WR	S(3)	S(5)	D	
18. Soliciting donations within work premises without permission from Management	WW	WR	S(3)	S(5)	D	
19. Using unprofessional, obscene, profane or indecent language within Company premises	S(3)	S(5)	D			
20. Proliferating unfounded information rumors, malicious gossip concerning the personal life of another employee	WW	WR	S(3)	S(5)	D	
21. Acting within or outside work premises which cast doubt on the employee's moral integrity and tarnishes the good name of the Group.	WR	WW	S(3)	S(5)	D	
22. Lending or borrowing money from subordinates within Company premises	WR	S(3)	S(5)	D		
23. Taking part in gambling, lottery, or any game of chance within Company premises	WR	S(3)	S(5)	D		
24. Exhibiting any pornographic material within Company premises	WR	S(3)	S(5)	D		
25. Indulging in immoral, indecent and lewd acts within Company premises	WR	S(3)	D			
26. Fighting, threatening, intimidating, coercing any staff member or participating in any form of altercation within Company premises	S(3)	D				
27. Intoxication or being under the influence of liquor or any controlled/prohibited substance within Company premises	WR	S(3)	S(5)	D		
28. Being charged in court for estafa, embezzlement or other crimes involving moral turpitude	S(30)	D				
29. Being charged in court with sexual harassment as defined under RA No. 7877	S(30)	D				
30. Commission of an offense within Company premises which is or may constitute a crime	S(30)	D				
31. Unauthorized use or possession of prohibited/regulated drugs within Company premises	S(30)	D				
32. Falsely testifying in inquiry or investigation being conducted the Company	S(30)	D				
33. Assuming or misrepresenting authority of company officers for any reason	S(30)	D				
34. Planting evidence against another employee to impute the commission	S(30)	D				

of an offense, in order to evade responsibility for the commission of an infraction.						
35. Willful deviation from legitimate instructions resulting in erroneous work output	WR	WW	S(3)	S(5)	(S15)	D
36. Failure to deliver work output without justifiable reason and despite repeated reminders	WW	WR	S(3)	S(5)	(S15)	D
37. Sleeping while on duty	WW	WR	S(3)	S(5)	S(15)	D
38. Willful violation of Company rules, regulations, policies and directives						
a. which will not result in a loss	WW	WR	S(3)	S(5)	D	
b. which may result in a loss	WR	S(3)	S(5)	D		
c. which results in a loss	S(3)	D				
39. Refusal without justifiable reason to perform the duties of an absent employee, despite oral or written instructions to do so	WR	S(3)	S(5)	D		
40. Gross negligence or willful inefficiency resulting in loss	S(30)	D				

D. Failure to Observe Security, Safety and Orderliness

	1 st Offense	2 nd Offense	3 rd Offense	4 th Offense	5 th Offense	6 th Offense
1. Bringing children and/or pets into the work place without permission.	WW	WR	S(3)	S(5)	S(15)	D
2. Disregarding office regulations on sanitation, cleanliness and orderliness	WW	WR	S(3)	S(5)	S(15)	D
3. Improper utilization of resources	WW	WR	S(3)	S(5)	S(15)	D
4. Habitual failure to properly record entry to office premises	WR	S(3)	S(5)	D		
5. Entering restricted area in the Company without permission from the proper authority	WR	S(3)	S(5)	D		
6. Refusal to undergo a medical examination required by the Company	WR	S(3)	S(5)	D		
7. Entering office premises without proper authorization and disregarding established security methods	WW	WR	S(3)	S(5)	D	
8. Knowingly bringing into the Company objects or paraphernalia which may put to risk the health, life and property of the Company and its employees including firearms and deadly weapons	S(5)	D				
9. Sabotage, wilful damage, abuse, defacing or destruction of Company property or those under its custody	S(5)	D				
10. Failure to report and/or to do the necessary steps in an emergency situation thus exposing fellow employees or the Company property to undue risk.	S(5)	D				
11. Deliberate withholding of any information regarding any serious, contagious disease which poses a threat to others	S(5)	D				
12. Unauthorized use of Company's logo, insignia or stationery	WW		S(3)	S(5)	S(15)	D
13. Theft or attempt to steal Company or personal property of others	D					
14. Tampering with any computer data or equipment	S(30)	D				