

## A. CODE OF BUSINESS ETHICS

The success of ALHI is dependent upon our clients' and shareholders' trust, and we are committed to preserving that trust. Employees and officers alike have a responsibility to ALHI, its customers, and shareholders to act in a way that will merit their continued trust and confidence. As such, each employee and officer of ALHI and its subsidiaries shall strictly observe the ALHI's Code of Business Ethics in the performance of their duties and responsibilities

Guidelines are as follows:

1. ALHI and its subsidiaries shall comply with all applicable laws and regulations and expects its Officers and Employees to conduct business in accordance with ALHI policies, procedures, and all relevant laws and to refrain from any illegal, dishonest, or unethical conduct.
2. No employee of the ALHI or any of its subsidiaries shall make or commit illegal contributions, bribes, or any type of illegal payment nor obtain favored treatment from anyone in connection with his work in ALHI or any of its subsidiaries.
3. No employee of ALHI or its subsidiaries shall willfully fail to carry out his assigned duties, nor deliberately misrepresent actual work performed, hours worked, or whereabouts while on duty. He will not perform any work or activities not directly related to ALHI or any of its subsidiaries' business during working hours.
4. Each employee of ALHI or its subsidiaries shall act in a professional manner and extend the highest courtesy to colleagues, visitors, customers, and clients. A cheerful and positive attitude is essential to ALHI's commitment to extraordinary customer service and impeccable quality.
5. Each employee or officer of ALHI or its subsidiaries may have access to confidential business information used by and belonging to the latter. Such employee acknowledges that all such information is in the nature of trade secrets and is the sole property of the ALHI and/or its subsidiaries. Said employee shall keep confidential, and will not reproduce, copy, or disclose to any other person or firm any information, correspondences, records, programs, systems, or other documents or processes used by ALHI or any of its subsidiaries; nor will he advise, discuss or in any way assist any person or firm in obtaining or learning the same. This shall apply for the entire period that he is employed by the ALHI or any of its subsidiaries and six (6) months from date of his separation therefrom.
6. In any situation where the employee is bound to exercise judgment and discretion and in the course of his performance of his functions, could be influenced by matters of personal gain or benefit for him to decide in favor of specific parties, the following guidelines shall govern:
  - 6.1 The employee should not accept any invitation for entertainment from any and all suppliers, contractors, business partners and other similar parties, except when in the middle of a field visit or field meeting where invitation is just for lunch or snacks where the refusal of such invitation is not in accord with ordinary courtesy.
  - 6.2 The officer/employee should not solicit nor accept any gift, cash, favor, entertainment, accommodation or privilege from suppliers, contractors and other business partners. If by reason of repetitive insistence, refusal is not acceptable, employee concerned shall turnover such gift or cash to the Board of Directors or to the Human Resources Department, who, at their discretion, may set aside such gift or cash for future activities that shall benefit all ALHI employees.
  - 6.3 Unless previously bound by personal ties which should be declared upon hiring, the officer/employee concerned is discouraged from promoting or advancing a personal

relationship with suppliers, contractors, and similar parties by way of making them *compadres*, inviting them to join the same organizations, promoting referrals, and the like.

- 6.4 Each officer/employee shall at all times practice and maintain a strictly professional business relationship with suppliers, contractors and business partners of ALHI and/or its subsidiaries.
7. No employee or officer of ALHI or its subsidiaries shall directly or indirectly engage in any business that competes with the ALHI and/or any of its subsidiaries without ALHI's prior written consent nor solicit in any other work manner for or assist any business. Moreover, each employee or officer of ALHI or its subsidiaries shall declare to the ALHI any and all businesses or involvement he may have with any competing business prior to and during actual employment.
8. Conflict of interest would refer to situations wherein judgment and discretion, in the course of a person's employment, could be influenced by matters of personal gain or benefit.
  - 8.1 Business decisions which are made must always reflect independent judgment and discretion, and must be based on the best interests of the ALHI and/or its subsidiaries.
  - 8.2 Situations where personal interest conflicts with the interests of the ALHI and/or its subsidiaries are not allowed whether or not it involves the any employee or officer of ALHI and/or any of its subsidiaries directly or any one of his /her immediate family members.
  - 8.3 In the context of conflict of interest, immediate family members refer to the spouse, parents, children, brothers and sisters of any employee or officer of ALHI and/or any of its subsidiaries, as well as the spouses of the latter's children, brothers and sisters.
9. The ALHI has put in place a mechanism open to feedback from employees, suppliers and third parties so they may submit reports regarding irregularities being committed by ALHI employees, officers, directors, suppliers and business partners who violate the ALHI's Code of Ethics directly to the HR Head thru the following contact details:

**Ma. Annie B. Ocampo**  
Human Resources & Admin Manager  
**ANCHOR LAND HOLDINGS, INC.**  
16/F L.V. Locsin Bldg.,  
6752 Ayala Ave. cor. Makati Ave., Makati City  
Trunkline #: (02)988-7988 local 340  
M: +63917 8826643  
S : annie\_hrad  
E : [annie\\_ocampo@anchorland.com.ph](mailto:annie_ocampo@anchorland.com.ph)  
W: [www.anchorland.com.ph](http://www.anchorland.com.ph)

The source of said reports shall be kept strictly confidential and any information given shall be investigated through due process.

10. Should an occasion arise in which an employee or officer of ALHI or any of its subsidiaries is unsure of his obligations, it is his responsibility to consult with his Immediate Superior and/or the HR Head.

Failure to comply could result to disciplinary action, up to and including termination of employment.

All employees are, at any time, required to refrain from any involvement or appearance of impropriety brought about by conflicts of interest. Any occasion or likelihood of any transaction involving conflict of interest shall be immediately reported to ALHI, through its Human Resource department.

## **B. CODE OF CONDUCT**

An erring employee shall be disciplined to protect the rights of ALHI, any of its subsidiaries and/or other employees and to establish and maintain a professional corporate environment in the organization. Corrective measures are not intended to inflict punishment but are designed to serve as deterrents to correct whatever work behavior and attitudes need to be changed, and to make employees aware of the importance of corporate policies and procedures. In some cases, it may extend to dismissal of an employee depending on the gravity and seriousness of the offense he has committed.

The Code of Conduct aims to:

- Provide guidelines in the administration of employees' discipline;
- Establish standards of professional conduct necessary for productive and efficient work that contributes to the attainment of the ALHI and its subsidiaries' vision and observance of core values;
- Clearly identify prohibited activities and provide employees with procedures for the administration of employee discipline for purposes of due process and fairness in imposing corrective action.

The Code of Conduct Policy:

- The Code of Conduct shall apply to all employees, regardless of rank, position, or status, at all times while on official duties.
- Ignorance of the policies, rules, and regulations of the Code of Conduct as well as related circulars or memoranda promulgated in the future shall not excuse any employee from non-compliance therewith or from the imposition of the proper sanctions.
- The disciplinary actions embedded in this Code are in the nature of preventive measures to ensure that employees do not go beyond the bounds of established ALHI and/or any of its subsidiaries'

policies and acceptable public morals. As such, when certain employee's behavior impinges on the reputation of the ALHI, any of its subsidiaries, or other employees, management has no recourse but to impose punitive actions equal to the misdemeanor committed.

- Other rules and regulations may be subsequently issued in the form of memorandum from time to time including update/revision of this Code to correct employee's conduct and behavior which shall be properly disseminated and shall form part of the ALHI and/or any of its subsidiaries' Code of Conduct.
- It is Management prerogative to place the employee on preventive suspension if his continued employment will create a serious and imminent threat or danger to the life or property of the employer and/or his co-workers.
- Sexual harassment cases shall be dealt with under a separate code in accordance with RA No. 7877 known as the "Anti Sexual Harassment Act of 1995". Said Act defines all forms of sexual harassment in employment, within and outside the workplace, to guarantee that the dignity of the officers, workers, employees, applicants for employment, or those undergoing training on the job are protected to the full extent. ALHI and its subsidiaries adhere to this policy and conform to the prescribed penalties under the said Act.

### **C. DISCIPLINARY SANCTION PROCESS**

#### **I. Notification**

1. An employee, regardless of rank or position level, who is observed by his immediate superior or reported to the latter by a concerned employee or an outsider to have committed any violation of the ALHI and/or any of its subsidiaries' rules, shall be initially investigated by his immediate superior.
2. If after the initial investigation, there is reasonable ground to believe that an infraction was committed, the immediate superior shall report his findings to HR. The HR Manager shall issue a Notice to Explain memo requiring the employee concerned to submit a written explanation immediately or within 24 to 48 hours from receipt of the memorandum, depending on the gravity of the case.
3. Upon receipt of the memo, the employee concerned shall explain his side in writing. Employee may attach supporting documents as he may deem necessary. The written explanation of the employee should be submitted to the HR Manager within twenty-four (24) hours or as indicated in the Notice to Explain memo issued to him. Refusal or neglect of the employee to explain within the prescribed time shall mean waiver of his right to be heard and to challenge the complaint being charged against him.
4. The memo is not a corrective action but rather to give the employee the opportunity to explain his actions and refute the allegations raised against him.

#### **II. Preventive Suspension**

1. Preventive suspension may be imposed against the erring employee if the offense committed is of such a nature that seriously threatens the life, security and/or property of any co-employee or ALHI and/or any of its subsidiaries. In such case, the Department Head of the employee concerned shall inform the HR Manager of these circumstances within twenty four (24) hours

from the commission of the offense or its discovery. Any damage/s and/or injury that may result due to the superior's inaction shall be a ground for corrective actions against the latter.

2. During the period that the employee is under preventive suspension, the employee shall not receive any pay. However, the employee shall be entitled to his/her full back wages should he be cleared from the charge against him.
3. The notice of preventive suspension shall be formalized in a memo indicating the number of days that the employee shall be under preventive suspension and when it shall commence and end. No preventive suspension shall last longer than thirty (30) calendar days. Further, no notice of preventive suspension shall be issued without prior knowledge of the Department Head concerned, the HR Manager and duly noted by the Head of the Corporate Affairs Department of ALHI.
4. If and when the sanction of the offense committed is lower than termination, the number of suspension days served shall be deducted from the number of days to be imposed by the disciplinary action. If the number of suspension days served is higher than the number of days to be imposed by the disciplinary action, the employee shall be paid back the difference.
5. If after the investigation, it was decided that the employee is not culpable of the infraction, he shall be paid full back wages for the period during which he was under preventive suspension and will be cleared of all the delays or liabilities of his work arising from his being under preventive suspension order.

### **III. Investigation/Validation**

1. Within five (5) working days from receipt of the employee's response to the memo or upon the lapse of the prescribed period within which to reply and submit the response to the HR Manager, the explanation letter shall be discussed by the HR Manager with the Department Head. Once a decision has been made, the HR Manager shall call on the employee concerned for a meeting to discuss the case and clarify other information related to the infraction committed.
2. For any offense which imposes sanction, it should be in accordance with the schedule of disciplinary actions for each infraction identified. Recommendations shall come from the Department Head and the HR Manager. However, should the decision be termination of employment, the case shall be taken up with the Head of the Corporate Affairs Department of ALHI and the final approval shall come from ALHI's Chief Executive Officer ("CEO").

### **IV. Decision/Recommendation**

1. In recommending/imposing the appropriate sanction, the following factors are to be considered:
  - a. Table of Offenses for the corresponding disciplinary action
  - b. Intent relative to the offense
  - c. Employee's record of conduct and behavior (i.e. 201 file, testimonies)
  - d. Code of Ethics and Code of Conduct provisions
  - e. Gravity of the offense
2. Abovementioned factors shall be the basis of imposing the penalty higher or lower than that prescribed in ALHI's Code of Conduct by the Department Head and the HR Manager.
3. Any deviation from the Table of Offenses shall require the endorsement of the Head of the Corporate Affairs Department of ALHI and the approval of the CEO prior to implementation.
4. For infractions not described in the list of offenses and sanctions, the Department Head and HR Manager shall impose a fair sanction taking into consideration the circumstances and alignment with the offenses and sanctions listed.

**V. Issuance of the Notice of Disciplinary Action (NDA)**

1. The NDA containing the sanction/disciplinary action shall be discussed by HR Manager and the Department Head thoroughly with the concerned employee before it is served.
2. Implementation of the decision and appropriate sanction shall take effect once the Department Head has submitted the agreed dates to serve the disciplinary action.
3. The NDA shall be issued to the employee concerned within five (5) working days from release of the sanction memo by HR, noted by the required level of management and received by the Department Head who will serve the NDA, copy furnished the following:
  - a. Original Copy - Employee
  - b. 1 Copy for 201 File
  - c. 1 Copy for the originating Department
4. For termination cases, the documented NDA shall be discussed and served to the employee by the HR Manager and the employee’s Department Head

**D. TABLE OF OFFENSES AND DISCIPLINARY ACTIONS**

Definition of Terms:

- o **Written reprimand** – a written admonition issued to an erring employee for an infraction of a rule and warning him that a repetition of the offense shall be dealt with more severely.
- o **Final warning** – a final written admonition issued to an employee upon repetition of an offense for which a written reprimand was previously given; or a commission of a more serious offense which requires a stronger disciplinary measure so that the repetition of the same offense shall subject the employee to suspension for a specific number of days.
- o **Suspension** – employee shall cease to report for work for a specified number of days without pay. Such advice shall be made in writing with a warning to the employee that continuous repetition of the same offense shall eventually mean dismissal. Suspension ranges from three (3) days to fifteen (15) days depending on the gravity of the offense.
- o **Dismissal/Termination** – an involuntary separation from service. Upon dismissal, employee shall forfeit all the benefits and privileges without prejudice to whatever legal action that the ALHI and/or any of its subsidiaries may take against him.

No. of Offense	Sanction	Remarks
1st	Written Reprimand	Disciplinary Action Notice
2nd	Final Warning/ Final Written Reprimand	Disciplinary Action Notice

<b>3rd</b>	Equivalent to # of days Suspension	Suspension ranges from 1 day to 15 days
<b>4th</b>	Equivalent to # of days Suspension	Suspension ranges from 3 days to 15 days
<b>5th onwards</b>	Suspension to Termination of Employment	10 days Suspension to Termination of Employment

Written Warning (WR)

Final Warning (FW)

1 Day Suspension (1S)

3 Days Suspension (3S)

5 Days Suspension (5S)

10 Days Suspension (10S)

15 Days Suspension (15S)

Termination of Employment (T)

**CODE OF CONDUCT  
(TABLE OF OFFENSES)**

**I. Offenses on Attendance and Punctuality**

	<b>Offenses Description</b>	<b>1<sup>st</sup></b>	<b>2<sup>nd</sup></b>	<b>3<sup>rd</sup></b>	<b>4<sup>th</sup></b>	<b>5<sup>th</sup></b>	<b>6<sup>th</sup></b>
1.	Tardy/Late - Coming late for scheduled reporting time and exceeding the 10-minute grace period. Tardiness shall be penalized under the following condition: <ul style="list-style-type: none"> <li>• Four (4) times tardiness or more and/or an accumulation of 60 minutes or more within a month whichever comes first</li> </ul>	VW	WR	FW	1S	3S	5S
2.	Undertime - Leaving the work area before the official quitting time for non-work related reasons (without immediate superior's approval)	WR	FW	3S	5S	10S	T

	<b>Offenses Description</b>	<b>1<sup>st</sup></b>	<b>2<sup>nd</sup></b>	<b>3<sup>rd</sup></b>	<b>4<sup>th</sup></b>	<b>5<sup>th</sup></b>
1.	Abandonment of Work Leaving work area during working hours without seeking permission nor informing the immediate superior; shall be considered as unauthorized absence	WR	1S	3S	15S	T
2.	Absence without notice <ul style="list-style-type: none"> <li>• Continuous absence without notice for at least five (5) days despite efforts by his/her superior and co-workers to contact him/her shall warrant termination of employment.</li> </ul>	WR	1S	3S	15S	T
3.	Absence from work for reasons except for probable sickness, emergency case where there is threat to life and property, or other	WR	1S	3S	15S	T

	reasonable causes without immediate superior approval					
4.	Unexcused absence of one (1) day	WR	1S	3S	15S	T
5.	Absence despite prior disapproval of request for permission to go on leave	WR	1S	3S	15S	T
6.	Failure to return to work promptly upon expiration of approved leave of absence or failure to obtain permission to extend leave	WR	1S	3S	15S	T
7.	Failure to report for work without justifiable reason/s. No call for notification of absence before the prescribed time of the day and no appearance.	WR	1S	3S	15S	T

**\* For Attendance and Punctuality Offenses: Every employee shall start a clean slate at the start of the following year.**

## II. Offenses on Time Keeping

	Offenses Description	1 <sup>st</sup>	2 <sup>nd</sup>	3 <sup>rd</sup>	4 <sup>th</sup>	5 <sup>th</sup>
1.	Deliberately not using the biometric device to time in/out and/or no time in/out in the biometric device	WR	FW	3S	15S	T
2.	Allowing another employee to file timekeeping forms	WR	FW	3S	15S	T
3.	Making false entries in the submitted form to avoid deductions or penalties and/or increase his pay/salary	T				
4.	Not using the biometrics device to time in/out but shall log in/out in the log book to falsify the time so as not to be tagged as late and avoid deductions	T				

## III. Offenses on Integrity, Work Conduct and Behavior

	Offenses Description	1 <sup>st</sup>	2 <sup>nd</sup>	3 <sup>rd</sup>	4 <sup>th</sup>	5 <sup>th</sup>
1.	Failure to wear CompanyID	WR	FW	3S	15S	T
2.	Failure to wear the prescribed dress code within Company premises	WR	FW	3S	15S	T
3.	Frequently receiving personal visitors during work hours; receiving/making Personal Telephone/Cellphone calls during work hours except during emergencies	WR	FW	3S	15S	T
4.	Engaging in horseplay within the Company premises	WR	FW	3S	15S	T
5.	Sleeping during work hours	WR	FW	3S	15S	T
6.	Abuse of personal privileges (i.e. extended or prolonged breaks, loafing, loitering, malingering or leaving work stations temporarily	WR	FW	3S	15S	T



	without permission during work hours)					
7.	Abuse of authority (i.e. superior's failure to follow due process under the code of ethics)	WR	FW	3S	15S	T
8.	Allowing the use of one's ID to any unauthorized person for any purpose.	WR	FW	3S	15S	T
9.	Posting or removing notices on the bulletin board by unauthorized personnel	WR	FW	3S	15S	T
10.	Feigning sickness or malingering to avoid assigned work or change in work location	WR	1S	3S	15S	T
11.	Performing work unrelated to his job or not connected with the ALHI and/or any of its subsidiaries' business during working hours	WR	1S	3S	15S	T
12.	Not cooperating with co-employees in the performance/completion of assigned work.	WR	1S	3S	15S	T
13.	Refusal of an employee to cooperate in any investigation conducted by the ALHI and/or any of its subsidiaries	WR	1S	3S	15S	T
14.	Refusal to submit to or failure to comply with security requirements of the ALHI and/or any of its subsidiaries	WR	1S	3S	15S	T
15.	Playing computer games on company-owned PCs during and <b>after</b> office hours <b>within office premises.</b>	WR	FW	3S	15S	T
16.	Sending unsolicited junk mail such as chain letters, love letters, white paper and other attachments, attacking another through the email as well as installation of unauthorized software, games, bitmap files, etc.	WR	1S	3S	15S	T
17.	Use of the internet, YM, and other instant messaging applications other than official ALHI and/or any of its subsidiaries' business purpose	WR	FW	3S	15S	T
18.	Negligence, carelessness, or inefficiency in the performance of assigned duties	WR	1S	3S	15S	T
19.	Insubordination or willful disobedience in carrying out work related legitimate orders, reasonable requests, or instructions of an immediate superior; refusal to accept work assignments and change of work location assigned by immediate superior	1S	3S	15S	T	
20.	Acts of disloyalty, disclosing, leaking out or revealing confidential or classified information to unauthorized employee or third parties, such as but not limited to commercial, financial and technical data, ALHI and/or any of its subsidiaries' procedures and other similar acts	T				
21.	Fabrication or tampering of evidence needed for case investigation	T				
22.	Submitting any false narrations of facts, answers to questions, or reports in relation with any ALHI and/or any of its subsidiaries' inquiry; submitting any false report as required by the ALHI and/or any of its subsidiaries; presentation of any forged, false or altered documents	T				

#### IV. Offenses against Persons

	Offenses Description	1 <sup>st</sup>	2 <sup>nd</sup>	3 <sup>rd</sup>	4 <sup>th</sup>	5 <sup>th</sup>
1.	Threatening, intimidating, harassing, or coercing fellow employees	WR	1S	3S	15S	T
2.	Quarreling during company time within company premises or on official company functions elsewhere	WR	1S	3S	15S	T
3.	Fighting, inflicting, or attempting to inflict bodily harm on another employee during company time on company premises or on official ALHI functions elsewhere	1S	3S	15S	T	
4.	Causing injury to another employee due to carelessness or horseplay	1S	3S	15S	T	
5.	Gross insubordination and disrespect to superiors	1S	3S	15S	T	
6.	The act or attempt to maliciously read, delete, copy or modify the e-mail of others	1S	3S	15S	T	
7.	Disrespectful attitude: Using disrespectful, profane, contemptuous, obscene and/or abusive language uttered verbally or by written or printed means, or by means of body signs or gestures, in dealing with, or relating to an immediate superior, subordinates, co-employee regardless of rank, title or any other person doing or transacting business with ALHI and/or any of its subsidiaries	3S	15S	T		
8.	Rumor mongering, making false, vicious or malicious statements against any employee	15S	T			
9.	Immoral, scandalous relationship/conduct (e.g., adultery, concubinage, acts of lasciviousness, exhibitionism) with a co-employee, within or even outside company premises, during or after working hours	T				
10.	Plotting against and/or maliciously imputing against persons in authority (i.e. superiors and management) or co-employees causing damage to one's person/dignity/reputation	T				
11.	Stealing, defrauding, or cheating fellow employees	T				
12.	Coercing, bribing, or inducing a co-employee to violate ALHI and/or any of its subsidiaries' rules and regulations	T				
13.	Taking the life of any person either willfully or through negligence	T				

#### V. Offenses against ALHI Interest

	Offenses Description	1 <sup>st</sup>	2 <sup>nd</sup>	3 <sup>rd</sup>	4 <sup>th</sup>	5 <sup>th</sup>
1.	Soliciting, peddling, selling, or vending any types of services to employees for personal gain or otherwise, within working hours and within company premises	WR	FW	3S	15S	T
2.	Unauthorized handling of jobs other than those specifically assigned	WR	1S	3S	15S	T
3.	Deliberately missing appointments related to ALHI and/or any of its subsidiaries' business	WR	1S	3S	15S	T
4.	Reimbursing non-official expenses (i.e. personal	WR	FW	3S	15S	T

	meals/entertainment, personal services)					
5.	Putting up or removing notices, announcements, posters, or other media in company premises, email, website, print, audio video or other media without prior authority	WR	1S	3S	15S	T
6.	Littering, writing graffiti, and defacing walls and ALHI and/or any of its subsidiaries' property	WR	1S	3S	15S	T
7.	Not following standard operating procedures and/or ALHI and/or any of its subsidiaries' policies resulting to exposure of ALHI and/or any of its subsidiaries to risks and/or costs/inefficiencies	WR	1S	3S	15S	T
8.	Not following standard operating procedures resulting in an accident, physical injuries, damage to property or ALHI and/or any of its subsidiaries' image	3S	15S	T		
9.	Engaging in any personal business or part time employment while using company's time	1S	3S	15S	T	
10.	Allowing/giving access to unauthorized persons to restricted areas without permission or authority	3S	15S	T		
11.	Use of unauthorized or unlicensed software within ALHI premises regardless of whether on company-owned or personally owned PCs or laptops	1S	3S	15S	T	
12.	Unauthorized access into ALHI and/or any of its subsidiaries' computers and data system	3S	15S	T		
13.	Drinking intoxicating beverages/alcohol during company time not sanctioned by any company affair or by management. If this results in a commission of an offense, a higher penalty shall be imposed	3S	15S	T		
14.	Reporting for work under the influence of habit-forming or prohibited drugs or substances or alcohol/liquor	T				
15.	Lacking prudence and abuse in the purchase of ALHI and/or any of its subsidiaries' property causing substantial loss or damage to the operations of the latter	5S	15S	T		
16.	Willfully or negligently causing or contributing to the loss of the ALHI and/or any of its subsidiaries' funds, property/documents, other employee's property/documents or other person's property/documents in trust or custody of ALHI and/or any of its subsidiaries	15S	T			
17.	Receiving gifts/cash from clients, or candidates/applicants; in effect, non-observance of the ALHI's Code of Business Ethics	T				
18.	Entering into any arrangements with suppliers or customers to obtain any consideration of value or preferential treatment	T				
19.	Soliciting gifts or favors in any form for services rendered in connection with an employee's duties in ALHI and/or any of its subsidiaries	T				
20.	Engaging or conniving in anomalous transactions prejudicial to ALHI and/or any of its subsidiaries	T				
21.	Offering, requesting, or accepting bribe or anything of value in exchange for job, work assignment, work location, or favorable	T				

	conditions of employment or for personal gain					
22.	Forging, falsifying, or altering official/ALHI and/or any of its subsidiaries' documents or personal record, either for applying employment or during the course thereof	T				
23.	Using fake/unauthorized receipts to obtain reimbursement of alleged expenses or payment	T				
24.	Divulging, leaking out or revealing confidential or classified information, technique, method or ALHI and/or any of its subsidiaries' secret to unauthorized employee, person, or competitors	T				
25.	Conviction of a criminal act by final judgment in the court of law	T				

### VI. Offenses against ALHI Property

	Offenses Description	1 <sup>st</sup>	2 <sup>nd</sup>	3 <sup>rd</sup>	4 <sup>th</sup>	5 <sup>th</sup>
1.	Using company time, materials, light, water, power, equipment or other property for unauthorized work	WR	1S	3S	5S	T
2.	Negligence in safekeeping of ALHI and/or any of its subsidiaries' property resulting to loss on the part of the latter	WR	1S	3S	5S	T
3.	Failure to report loss/damage of ALHI and/or any of its subsidiaries' property under his/her accountability	WR	1S	3S	15S	T
4.	Unauthorized use or operation of ALHI and/or any of its subsidiaries' equipment	WR	1S	3S	5S	T
5.	Unauthorized use of any ALHI and/or any of its subsidiaries' service vehicle	WR	1S	3S	5S	T
6.	Allowing unauthorized persons to ride or drive ALHI and/or any of its subsidiaries' vehicles	1S	3S	10S	T	
7.	Misusing, destroying, or damaging ALHI and/or any of its subsidiaries' property	1S	3S	10S	T	
8.	Unauthorized sale or disposal of ALHI and/or any of its subsidiaries' property	3S	5S	10S	15S	T
9.	Stealing or attempting to steal ALHI and/or any of its subsidiaries' property or property of another employee	T				
10.	Substituting ALHI and/or any of its subsidiaries' material or equipment with another of inferior quality or lesser value with intent to cheat ALHI and/or any of its subsidiaries	T				

### VII. Offenses against Safety and Security

	Offenses Description	1 <sup>st</sup>	2 <sup>nd</sup>	3 <sup>rd</sup>	4 <sup>th</sup>	5 <sup>th</sup>
1.	Smoking in "No Smoking" areas	WR	FW	3S	15S	T
2.	Failure to observe a common safety rule or practice	WR	FW	3S	15S	T
3.	Tampering with or misuse of fire protection equipment and alarm system or the unauthorized use of it other than its primary purpose	WR	FW	3S	15S	T
4.	Obstructing aisles, fire exits and equipment locations	WR	1S	3S	15S	T
5.	Operating or driving ALHI and/or any of its subsidiaries' service	WR	1S	3S	15S	T

	vehicles carelessly or at high speed on official business or in violation of any of the provisions of the Land Transportation and Traffic Code					
6.	Negligence or carelessness in the performance of assigned duties, resulting in physical injury of any person	WR	1S	3S	15S	T
7.	Concealing or possessing any deadly or prohibited weapon or firearm at anytime within company premises	15S	T			

### VIII. Offenses on Health

	Offenses Description	1 <sup>st</sup>	2 <sup>nd</sup>	3 <sup>rd</sup>	4 <sup>th</sup>	5 <sup>th</sup>
1.	Failure to submit for physical examination during scheduled period	WR	FW	3S	5S	T
2.	Submitting false reports and information affecting the health and well-being of the employees	3S	5S	10S	15S	T
3.	Non reporting by an employee of his serious contagious disease that might affect his co-employee	10S	15S	T		
4.	Presentation of any forged, false, or altered document showing good health or as justification to return to work.	T				
5.	Bringing or attempting to bring inside ALHI premises, at any time, any prohibited drug for personal use or to influence co-employee/s to use the same	T				

### IX. Cardinal Offenses

	Offenses Description	1 <sup>st</sup>	2 <sup>nd</sup>	3 <sup>rd</sup>	4 <sup>th</sup>
1.	Gross negligence resulting to losses on the part of the ALHI	3S	5S	15S	T
2.	Unauthorized act of removing, copying or reproducing, taking, destroying or attempting to remove, take or destroy ALHI and/or any of its subsidiaries' official records, files or documents that contains classified or confidential information about any aspect of ALHI and/or any of its subsidiaries' management, operations, and activities including personnel, system, equipment and records.	5S	15S	T	
3.	Deliberate destruction or disabling ALHI and/or any of its subsidiaries' property	5S	15S	T	
4.	Inciting or participating in concerted work stoppage, slowing down, mass leave, sit-down, riot or other similar disruptive activities	5S	15S	T	
5.	Gross abuse of authority, coercion, maltreatment or any retaliatory acts	10S	15S	T	
6.	Engaging in any activity which is directly competitive with the ALHI and/or any of its subsidiaries' business or any part of its operations	15S	T		
7.	Sabotage	T			
8.	Forging, making unauthorized erasures, obliteration or additions which resulted to falsifications, misrepresentations, concealment of facts, or fabrication of ALHI and/or any of its subsidiaries' documents or records	T			
9.	Grave act of dishonesty and other fraudulent acts	T			
10.	Theft and pilferage of ALHI and/or any of its subsidiaries' property	T			
11.	Embezzlement, malversation, and/or misappropriation of ALHI and/or	T			

	any of its subsidiaries' funds				
12.	Stealing or attempting to steal ALHI and/or any of its subsidiaries' property or other employee or officer's property	T			
13.	Withholding of relevant data or giving false statements in the application form like personal data, personnel records, credentials and licenses, medical records like false birthdays, previous employment, educational attainment, medical history, marital status, or other material representations with intent to mislead, misrepresent, or concealed incriminatory information	T			
14.	Falsification of records, furnishing false data, or committing an act with deliberate intent to defraud ALHI and/or any of its subsidiaries	T			
15.	Giving false information to any party about the ALHI and/or any of its subsidiaries' operation	T			
16.	Making false, vicious, or malicious statements about anything against employees, ALHI and/or any of its subsidiaries	T			
17.	Unauthorized disclosure of confidential or proprietary information	T			
18.	Violation of the ALHI and/or any of its subsidiaries' policies on integrity	T			
19.	Betrayal of ALHI and/or any of its subsidiaries' trust	T			
20.	Unauthorized solicitation using ALHI and/or any of its subsidiaries' name to besmirch or ruin the reputation of the latter	T			
21.	Discussing confidential business matters (i.e. strategies, plans, tactics) to destroy the ALHI and/or any of its subsidiaries or for the latter to suffer losses	T			