



Evergreen

Lifeplan Services, Inc.

Code of Conduct

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CODE OF CONDUCT

Evergreen Lifeplan Services, Inc. ("ELSI") is committed to maintain a high standard of business ethics and integrity and to adhere to good corporate governance in order to provide the highest level of service for its customers. To this end, it mandates its officers, employees, and personnel to faithfully adhere to a Code of Conduct which would develop and instill discipline through good leadership and human relations.

This Code of Conduct shall therefore be the embodiment of ELSI's integrity, accountability, and quality. This shall therefore serve as the guidelines and expectations on how ELSI conducts its business and operations.

Applicability

This Code of Conduct shall apply to all Company officers and employees at all levels, regardless of their individual roles, position, or practice. Everyone is expected to follow and practice this Code of Conduct in order to maintain professionalism, integrity, mutual respect, and fairness in the daily course of business and interactions with co-employees or any other points of contact (internal or external).

Everyone is, thus, expected, and shall have the responsibility to fully read, understand and comply with the Code along with its pertinent procedures and other requirements.

Implementation of this Code, including the recording of all the offenses and ensuring that due process is observed in imposing sanctions, shall be the responsibility of the HR Department and Division Managers.

An employee's right to due process shall always be respected. Employees have the right to be informed in writing regarding the nature and cause of the offense. They also have the right to be heard by the proper authorities. (*Refer to Grievance procedure*)

Norms and Conduct

The following principles form the foundation of the norms and conduct of every employee of ELSI. It is, thus, important that each and every employee shall fully comply and adhere to the following principles, standards, and policies.

Safety & Security – Every employee shall take safety precautions in handling Company equipment, vehicles, and the like. Every employee shall also refrain from any unsanitary practices such as spitting, urinating, or littering within Company premises. Lastly, no employee

shall refuse to undergo medical check-ups, drug tests, and other similar requirements especially when ordered/advised by the Company.

Diversity in the Workplace – The Company rejects all forms of discrimination including any attempt to discriminate on the basis of gender, or religion, among others, in making rewards, promotions, or appointments to any position. Everyone is, thus, encouraged to always treat others with dignity and respect.

Client Treatment – The Company strives to treat customers with high standards of honesty, fairness, and courtesy. Clients and customers must be able to voice their concerns easily, and we must therefore deal with complaints and disputes fairly and quickly. The service that the Company provides to its customers shall always meet high standards of professionalism.

Conflict of Interest – All employees are expected to avoid situations that can result to even the appearance of a conflict of interest. If an employee finds himself or herself in such a situation, he/she must immediately disclose it to his/her supervisor. Close relationships, associations, or activities could give rise to a potential conflict of interest. It is important to disclose such facts immediately in order to avoid suspicion or any potential harm that it may cause.

Privacy and Confidentiality - Any information obtained by any employee from the Company's clients may not be shared, sold, or placed electronically or otherwise outside of Company reports, records, manuals, and computer systems. Information is an asset. Thus, any unauthorized use of information not only damages the reputation of the Company but also puts our clients at risk of having their right to privacy violated. Every employee must therefore secure and safeguard any confidential information that may be entrusted or disclosed to them.

Classification of Violations

An offense or violation shall be categorized as follows:

According to Nature

1. Money and Property - These are offenses resulting from activities involving unlawful or unauthorized use or misuse of Company assets, including cash advances provided to the employee.
2. Safety and Security – These are offenses resulting from violations of rules and regulations on safety and security that may result in injury, death, destruction, or loss of Company assets.

3. **Productivity** – These are offenses resulting from acts that may cause poor productivity and inefficiency. ELSI reserves the right to define or establish productivity standards.
4. **Conduct and Decorum** – These are offenses resulting from activities involving unacceptable behavior, physical appearance that does not conform with Company standards, and relationships with co-workers detrimental to Company productivity and reputation.
5. **Ethical Behavior** – These are offenses resulting from acts considered as unethical or contrary to ethical standards.

According To Severity

1. **Light Offenses (Class 1)** – These are offenses that are relatively minor in nature. The commission will not pose a threat to overall business operations and is generally easy to correct. The first commission of this offense is generally punishable by a written reprimand.
2. **Moderate Offenses (Class 2)** – These are offenses with a slightly higher degree of severity. The act presents a serious and imminent threat to the Company's interests and its employees. The first commission of this offense is generally punishable by suspension.
3. **Serious Offenses / Criminal Acts (Class 3)** – These are offenses that can potentially result in serious injury, permanent disability, loss of lives, or large financial loss to the Company, or may significantly tarnish the image or reputation of the Company or the employee's relationship with the Company. The first commission of this offense is generally punishable by dismissal.

The following are the classifications of specific offenses or violations:

AS TO NATURE	AS TO SEVERITY		
<u>Money & Property</u>	LIGHT	MODERATE	SERIOUS
1. Unauthorized use or operation of Company property and equipment or allowing the use of Company property by someone other than the employee to whom the property was assigned.	✓		

2. Failure to report any damage or defect of Company equipment, tools, materials, etc.	✓		
3. Failure to report loss of Company property or spoilage of cargo known or under an employee's accountability.	✓		
4. Failure to report immediately to one's immediate supervisor any defect or damage due to accident or other causes on any Company equipment, vehicle, or other Company property.	✓		
5. Improper use of Company vehicle, equipment, and facilities resulting in damage and/or accident.		✓	
6. Unauthorized use or operation of Company property and equipment, or allowing the use of Company property and equipment under employee's custody by other persons without the approval of Management.		✓	
7. Unauthorized use of Company property or equipment for personal gain.		✓	
8. Unauthorized use or misuse of electronic email, voicemail, and other electronic media outlets including Company website or social media accounts for purposes other than business and official use.		✓	
9. Installation of any unauthorized applications, programs, and software to any Company cellphone, laptop, or computer.		✓	
10. Vandalism or deliberately defacing Company property.		✓	
11. Simple negligence causing wastage, spoilage, and damage to, or loss of, Company property with value of not more than Php5,000.00.		✓	

12. Substituting Company property or equipment with another of inferior quality or of lesser value.		✓	
13. Offering or accepting directly or indirectly anything of value in exchange for a purchase or job order and the like from suppliers.		✓	
14. Carelessness resulting in loss of Company funds.		✓	
15. Multiple violations during a 12-month period, the penalty for one or all of which is at least suspension from work.		✓	
16. Theft / Stealing			✓
17. Embezzlement, misuse, or misappropriation of Company funds / estafa.			✓
18. Withholding collections or delayed remittance within the prescribed 24-hour period.			✓
19. Unauthorized sale or disposition of Company property.			✓
20. Simple negligence causing wastage spoilage, or damage to, or loss of, Company property with value of Php5,000.00 or more.			✓
21. Gross negligence causing wastage, spoilage, or damage to, or loss of, Company property regardless of value.			✓
22. Abuse, misuse, or deliberate destruction or damage of Company property, property of co-employees, or of Company visitors.			✓
23. Attempting to obtain reimbursement of personal or non-work related expenses.			✓
24. Claiming overtime pay without actually performing work.			✓

25. Attempting to connive or actual connivance on the part of an employee to defraud the Company.			✓
26. Obtaining or attempting to obtain materials and supplies on fraudulent orders.			✓
27. Extortion: unauthorized solicitation of money or goods for personal gain from customers and/or suppliers.			✓
<u>Safety & Security</u>			
1. Failure to take safety precautions in handling equipment, vehicles, and the like.	✓		
2. Failure to follow Company rules on safety and precaution.	✓		
3. Eating or bringing food in areas where eating is prohibited.	✓		
4. Unsanitary practices such as spitting, urinating, or littering within Company premises.	✓		
5. Refusal to undergo reasonable inspection or failure to observe security requirements within the Company premises.	✓		
6. Not following the Company doctor's advice.	✓		
7. Refusing to undergo medical check-ups, drug tests, and other similar requirements.		✓	
8. Creating unsafe conditions.		✓	
9. Sale, possession, or unauthorized bringing of any alcoholic beverage within Company premises.		✓	
10. Reckless driving or failure to observe traffic rules using Company vehicles.		✓	
11. Driving Company vehicles without a valid driver's license or with an expired driver's license.		✓	

12. Smoking in NO SMOKING areas.		✓	
13. Entering restricted areas without permission; allowing and/or failing to report unauthorized person's entry in restricted areas.		✓	
14. Violations of regulations on environmental protection.		✓	
15. Not reporting serious or contagious disease afflicting the employee, or reporting to work while disease is still contagious or communicable.		✓	
16. Violation of security rules and Company safety practices.			✓
17. Submitting false reports and information affecting safety and security.			✓
18. Causing injury to persons due to negligence.			✓
19. Unauthorized use of vehicles, equipment, and other Company properties.			✓
20. Multiple violations within the 12-month period of safety and security rules and regulations where the prescribed penalty for one or all would at least be suspension from work.			✓
21. Negligence in safekeeping and handling of sensitive Company documents.			✓
22. Unauthorized disclosure of classified information outside the Company or to unauthorized employees.			✓
23. Bringing or possessing deadly weapons such as knives, ice picks, and/or sharp instruments, prohibited firearms, highly inflammable materials, or illegal drugs (or use thereof) within Company premises or during Company-sponsored activities.			✓

24. Illegal use or indiscriminate firing of firearms or deadly weapons within Company premises or during Company-sponsored activities.			✓
<u>Productivity</u>			
1. Tardiness (3 times in 2 weeks).	✓		
2. Extending break times (3 times in 2 weeks).	✓		
3. Leaving the workplace without permission.	✓		
4. Malingering and loafing during office hours.	✓		
5. Negligence in the performance of duties without loss or damage to Company property.	✓		
6. Performing other non-related functions/duties during working time.	✓		
7. Absence Without Leave (AWOL) or despite denial of leave request from 1 to 3 days within a 15-day period. <i>(Except for a justifiable cause)</i>	✓		
8. Failure of an employee to inform the HRD within ten (10) days of any change in his/her personal data such as civil status, address, and contact number.	✓		
9. Sleeping at work while on duty.		✓	
10. Not following Standard Operating Procedures.		✓	
11. Absence Without Leave (AWOL) or despite denial of leave from 4 to 6 days within a 15-day period. <i>(Except for a justifiable cause)</i>		✓	
12. Refusing to work during office hours.		✓	

13. Disobeying lawful orders of supervisors, including refusal to submit reports as required by supervisor. (Insubordination)		✓	
14. Willfully holding back, slowing down, hindering, or limiting work progress.		✓	
15. Failure of supervisor to detect and report a violation of this Code or any Company policy by a subordinate, if such failure is due to the supervisor's fault or negligence.		✓	
16. Multiple violations of Productivity provisions of this Code within a 12-month period where disciplinary action for one or all would at least be suspension from work.			✓
17. Absence Without Leave (AWOL) or despite denial of leave for at least 7 days within a 15-day period (<i>except for a justifiable cause</i>) or abandonment of work (5 days continuous AWOL)			✓
18. Hiding, losing, or misplacing vital Company records, causing damage to the Company or its operation.			✓
19. Inciting riot or work stoppage.			✓
20. Participating in illegal strike against the Company or its officers.			✓
21. Neglecting duties resulting in significant loss or damage to Company property and substantial disruption of operation.			✓
<u>Conduct & Decorum</u>			
1. Non-wearing of Company uniform, including Company ID.	✓		
2. Horse-playing, scuffling, cat-calling, and other distracting or non-injurious acts.	✓		
3. Insulting co-employee verbally or non-verbally.	✓		

4. Tampering or unauthorized posting or removal of items posted on bulletin boards.	✓		
5. Distributing or posting unauthorized printed matter on bulletin boards, on Company premises, and/or on Company activities	✓		
6. Wearing improper/indecent attire or unkempt appearance.	✓		
7. Rumor-mongering causing damage to the reputation of co-employee and/or the Company.		✓	
8. Lending one's Company ID.		✓	
9. Any act of perjury.		✓	
10. Horse-playing, cat-calling, and other distracting or injurious acts resulting in physical injury and/or damage to Company property.		✓	
11. Gambling, collecting bets (for bookies) within Company premises.		✓	
12. Fighting within Company premises.		✓	
13. Fighting, provoking, instigating, or challenging a person to a fight within Company premises.		✓	
14. Threatening others with bodily harm for any reason within Company premises or during Company-sponsored activities.		✓	
15. Drinking within Company premises except when allowed during Company socials like anniversaries, Christmas parties, and the like.		✓	
16. Reporting for work under the influence of liquor or drugs.		✓	
17. Discourtesy and disrespect to superiors, elders, clients, Company visitors, etc.		✓	

18. Using profane, obscene, or offensive/insulting language or uttering vile, provocative language to co-employees.		✓	
19. Exhibition or distribution of pornographic materials or committing immoral acts.		✓	
20. Engaging in any form of money-lending activity inside the Company premises for profit		✓	
21. Refusing to testify or appear when summoned for investigation on Company-related matters.		✓	
22. Multiple violations within the 12-month period where disciplinary action for one or all would be suspension from work.		✓	
23. Engaging in activities detrimental to the best interest of the Company or in competition with Company business.			✓
24. Assault on persons of authority, co-employees, clients, and customers within Company premises or during Company-sponsored activities.			✓
25. Threatening, intimidating, and coercing superiors and co-employees.			✓
26. Serious horseplay or culpable negligence resulting in serious physical injuries and/or death.			✓
27. Using, processing, distributing, or peddling prohibited drugs or other illegal items.			✓
28. Giving false testimony, implicating a co-employee in an offense by planting, destroying, or tampering evidence for the purpose of concealing offenses or misleading investigation.			✓
29. Malicious mischief / Acts of lasciviousness / Sexual harassment.			✓

30. Immorality			✓
31. Commission of and conviction of crimes.			✓
32. Sabotage.			✓
<u>Ethical Behavior</u>			
1. Failure to return to work promptly upon expiration of the leave of absence.	✓		
2. Failure to return to work at the appointed time following cessation of a disciplinary suspension.	✓		
3. Punching in other employees' timecards knowingly / having one's card punched by another.		✓	
4. Divulging or comparing one's salary with others.		✓	
5. Abuse of power and authority.		✓	
6. Using position and authority to obtain personal favors.		✓	
7. Exerting undue influence on co-employees by managers/supervisors for personal gain.		✓	
8. Using Company influence on suppliers for personal benefit.		✓	
9. Using Company property for unauthorized purposes without higher management's approval.		✓	
10. Faulty work or inefficiency after attention has been called to same.		✓	
11. Falsely representing oneself as an agent or representative of the Company or any of its departments or agencies.		✓	
12. Multiple violations within the 12-month period where the disciplinary action for one or all would be suspension from work.		✓	

13. Forging the signature of any employee with intent to gain, defraud another, cover a negligence, misdeed or violation of this Code or Company policy, or for any other analogous reason.			✓
14. Retaliation of any form against a co-employee for reporting a violation of this Code or any Company policy.			✓
15. Unauthorized withdrawal of a co-employee's salary through deceit or misrepresentation.			✓
16. Divulging the Company's confidential information on strategies, and finances, including salaries, benefits, etc.			✓
17. Gross act of dishonesty.			✓
18. Using Company time and resources for personal business interests.			✓
19. Engaging in business directly or indirectly in competition with the Company.			✓
20. Failure to do job assignment, stubborn behavior, uncooperative attitude, discourtesy, or refusing to obey orders of superiors pertaining to work resulting in material damage or losses to the Company; violation of lawful order or rules/regulations in the performance of the job.			✓
21. Giving or accepting bribes, including rebates, and gifts from parties with whom the Company deals with.			✓
22. Fraudulent statement of any nature in the biodata resume submitted or any information in the application for employment.			✓
23. Performing acts for the purpose of benefiting or favoring the Company's competitors.			✓

24. Without proper authority, revealing, releasing, or divulging, other than to authorized persons confidential information, Company trade secrets, formulae, plans, programs, operations, financial inventories, and confidential matters or information.			✓
25. Conflict of interest, which tends to favor or benefit own personal business over the Company's best interests.			✓

Article 297 of the Labor Code is deemed incorporated into this Code. Hence, the following acts constitute just cause for termination of employment:

1. Serious misconduct or willful disobedience by the employee of the lawful orders of his employer or representative in connection with his work;
2. Gross and habitual neglect by the employee of his duties;
3. Fraud or willful breach by the employee of the trust reposed in him by his employer or duly authorized representative;
4. Commission of a crime or offense by the employee against the person of his employer or any immediate member of his family or his duly authorized representatives; and
5. Other causes analogous to the foregoing.

Disciplinary Actions

1. ***Written Reprimand*** – This is in the form of a letter given to an employee, warning and reprimanding him for the violations of policy, rules, or regulations. It also specifies the consequences of repetition.
2. ***Suspension without Pay*** - This disciplinary action is given starting on the 1st moderate offense or 2nd light offense. The suspension can be a minimum of one (1) workday to a maximum of two (2) weeks depending on the gravity and impact of the offense.
3. ***Dismissal for Cause*** – A severe penalty for habitual, malicious, or gross violation of Company rules and regulations and continuous commission

of offenses in spite of suspension. The employee found guilty of these offenses is subject to outright termination.

The penalties to be imposed for each violation shall always take into consideration the absence of malice, bad faith, negligence, or dishonesty on the part of the employee concerned. Furthermore, the employees' record of performance, the extent of his/her participation, the presence of mitigating and aggravating circumstances, and the amount of loss or injury caused shall likewise be taken into consideration.

Treatment of Offenses

The severity of and punishment for offenses shall be determined by Management in accordance with the table of penalties below. However, the Management may increase or decrease the penalty upon consideration of relevant and material factors such as but not limited to the performance of the employee, the number of times that the employee has violated Company rules and regulations, the position of the employee, and the existence of other mitigating or aggravating circumstances.

FREQUENCY	LIGHT CLASS 1	MODERATE CLASS 2	SERIOUS CLASS 3
1 st Offense	Written Reprimand	3 DAYS Suspension	DISMISSAL
2 nd Offense	1 DAY Suspension	1 WEEK Suspension	
3 rd Offense	3 DAYS Suspension	2 WEEKS Suspension	
4 TH Offense	1 WEEK Suspension	DISMISSAL	
5 TH Offense	DISMISSAL		

Procedures in Implementing Disciplinary Actions

1. The imposition of a penalty or implementation of a disciplinary action shall be solely based on hard facts. An objective investigation and assessment of the case must first be conducted before a penalty is imposed. In case of doubt, the resolution of a case shall be in favor of the employee. This, however, does not prevent Management from exercising its prerogative by taking appropriate actions such as transferring or reassigning the employee to prevent possible recurrence, or any such action deemed to be in the best interest of the Company.
2. The HR Department shall issue a Notice to Explain within two (2) days or 48 hours upon discovery of the offense and preliminary investigation of the offense. The Notice of Offense shall contain the act committed

and shall ask for an explanation about the employee's side of the case within five (5) days from receipt of the notice. This shall be accomplished in three (3) copies and distributed as follows:

- ORIGINAL – Employee's copy
 - SECOND COPY – HRD / 201 File
 - THIRD COPY – General Manager (discretionary)
3. The employee shall write an explanation and submit it to the HR Department within five (5) days from receipt of the notice, **inclusive of weekends or non-working days.**
- Failure to submit a written explanation within the allotted time shall be deemed as a waiver of the employee's right to be heard. In such case, the HR Department may then initiate the corresponding disciplinary action.
4. The HR Department shall conduct a thorough investigation and shall render a decision within seven (7) days from receipt of the employee's explanation or from the completion of the administrative hearing or investigation if one is conducted.
5. A Notice of Decision shall be accomplished and distributed following the same procedure as the Notice to Explain.
- In cases of suspension, disciplinary action must take place within seven (7) days from decision.

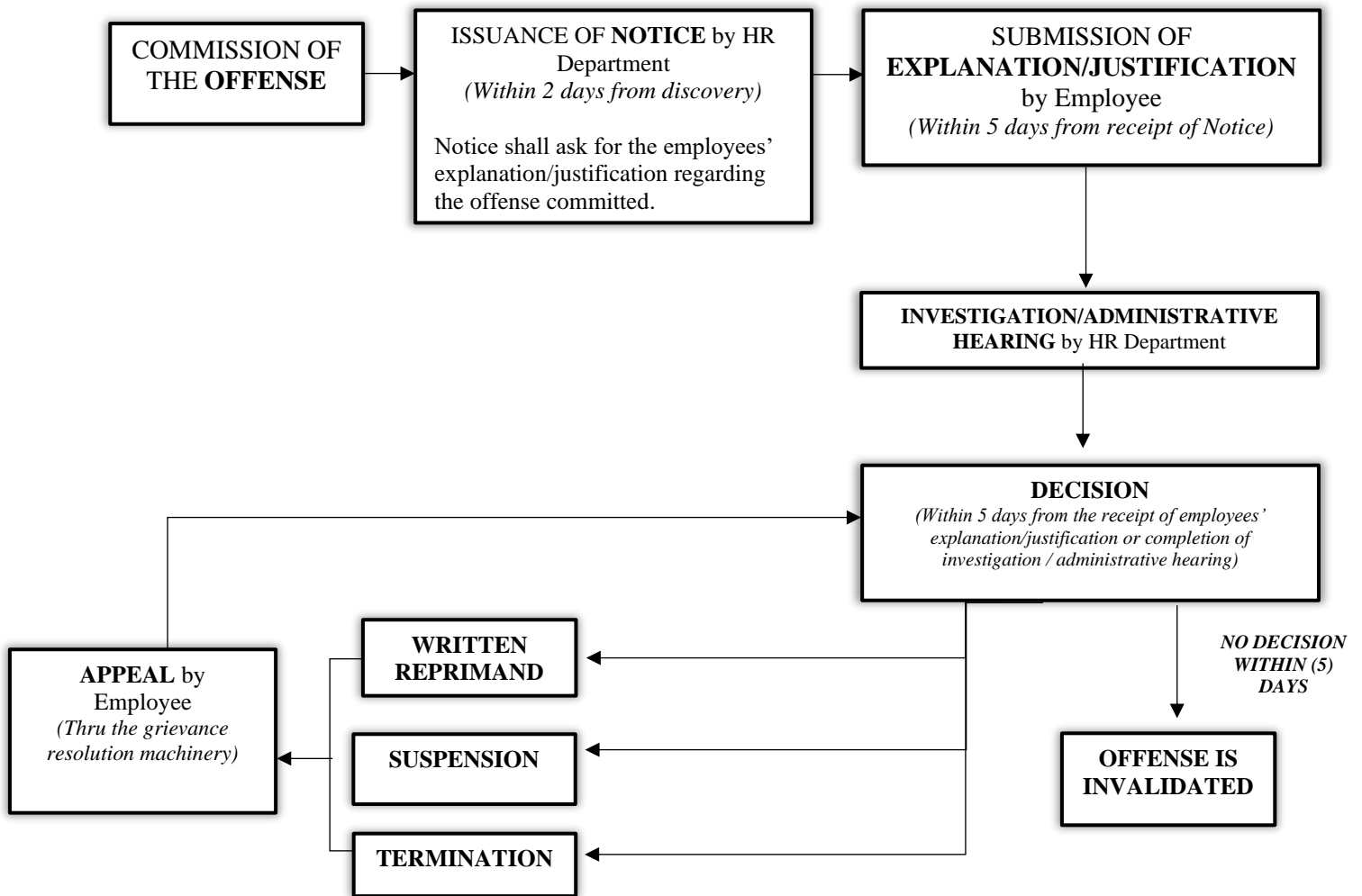
Employee Appeal

Any employee who receives a Notice of Decision may file an appeal to the Grievance Committee and, thereafter, to the President/General Manager in accordance with the Grievance Resolution Machinery upon the following grounds:

1. There is newly discovered evidence that could alter the decision; or
2. There is insufficient evidence to justify the decision.

The Grievance Committee shall evaluate the appeal and render a decision within five (5) days from receipt of the appeal. Decisions of the Grievance Committee shall be appealable to the President/General Manager within five (5) days from receipt by the employee of the Decision. The President shall resolve the appeal within five (5) working days from receipt thereof.

Flowchart of Procedure in Implementing Disciplinary Actions



Grievance Resolution Machinery

Definition

Grievance Resolution Machinery shall be established by the Company to encourage its employees to air out their concerns, problems, or grievances to their respective superiors, to facilitate the resolution of problems arising out of work relations, and to ensure fairness, consistency, and due process in the enforcement of discipline and of the Company’s policies and programs.

Grievance

Definition

- Any problem, dispute, or unresolved differences covering terms and conditions of employment.
- Any problem, dispute, or unresolved differences concerning the implementation of policy, or Company rules and regulations.

Guidelines and Procedures in Grievance Handling

1. Except on matters pertaining to disciplinary action as provided above, any grievance concerning any ruling, practice, or working condition in the Company or any complaint that an employee may have against the Company must be submitted in writing to the HR Department within one (1) week after the occurrence of the cause or event which gave rise to the grievance. The HR Department shall resolve the grievance within three (3) days from receipt thereof.
2. If the employee is not satisfied with the decision of the HR Department, he/she can immediately appeal in writing to the Grievance Committee who shall resolve such grievance or complaint within ten (10) days from the date of submission. The Grievance Committee shall be composed of two (2) representatives from the Company and two (2) independent persons who are respected in the field of human relations or law.
3. If the employee concerned is not satisfied with the decision of the Grievance Committee, he/she shall have five (5) days from receipt of the resolution to appeal in writing to the President/General Manager of the Company. If he/she does not appeal within five (5) days, then said decision becomes final and executory.
4. The President/General Manager of the Company shall have five (5) working days from receipt of the written appeal within which to resolve the matter.

Non-Exclusive Clause

1. The Company shall adopt a non-exclusive clause policy, which means that other acts not specified or included in this Code may be deemed as violations of Company rules and regulations, and the Management shall have the prerogative to determine and impose the appropriate sanction therefore taking into consideration this Code and other Company policies and the law.
2. The determination of penalties or corresponding actions shall be within the Management's prerogative, without prejudice to the filing of criminal/civil cases against the employee as may be deemed to the best interests of the Company.
3. Amendments, as necessary, in keeping with the changing times, to correct and/or upgrade appropriate provisions shall be the sole discretion of the Management of ELSI.