

Code of Conduct Implementing Rules and Regulations

Table of Contents

Employee Well-being in the New Normal	4
Implementing Rules and Regulations	4
Whistleblower Policy	4
Categories of Offenses	5
Corrective Actions	6
Verbal Counselling	6
Written Counselling	6
Suspension and Dismissal	7
Preventive Suspension	7
Effect of mitigating and aggravating Circumstances	7
Offenses not specifically found in the IRR	8
Ageing of Offenses	8
Due Process	8
Table of Offenses	
• Conflict of Interest	9
• Performance and Attendance	10
• IT and Communications	11
• Safety, Security, Health and Environment	12
• Harrasment, Fraud and Bribery	13
• Others	14



Employee Well-being in the New Normal

Employee Well-being in the New Normal

In view of the challenges of work and business in the New Normal, FPG Insurance undertakes all measures to ensure a safe and hygienic workplace as a pillar of doing and sustaining business in the so-called New Normal.

As part of our efforts to keep employees protected from exposure to disease as well as recognizing the resulting scarce means of transportation and mobility due to government quarantine measures, FPG Insurance embraces Work-From-Home (WFH) arrangements for its managers and employees to maintain if not level-up productivity of the work force. We also recognize that WFH is best in enhancing the health and well-being not only of our employees but their family as well.

The WFH policy is a mark of FPG Insurance's trust and faith in the maturity and professional integrity of our employees to achieve sustained productivity given new challenges.

FPG Insurance encourages employees to keep their personal health and well-being foremost in mind. Employees must follow measures prescribed by public health officials to prevent exposure to and infection with the virus. FPG Insurance will monitor and ramp up observance of hygiene and protective measures in its premises, encouraging employees to be vigilant of their condition for early and timely intervention where FPG may be of assistance.

Implementing Rules and Regulations

Every employee is capable of conducting himself uprightly. Tasked to perform his duties and responsibilities in cooperation with his co-employees, he and his peers, working as a team, are likewise disposed to act in a manner conducive to the attainment of the group's aims within the organization.

Accordingly, these Implementing Rules and Regulations (IRR), like the other company rules and regulations, are not meant to supplant such personal discipline but instead complement it by clarifying the acceptable standards of behavior.

Whistleblower Policy

It ensures that all employees act with integrity in all situations by reporting illegal or non-compliant conduct.

- Employees shall report any practices or actions believed to be inappropriate under the Code or illegal either to their Line Managers, Head of HR or Head of Compliance.
- If appropriate, in view of the nature of the reported matter, reports of violations may be made directly to higher levels including the Group's Chief Executive Officer.
- Complaints may be made on a confidential basis or through Employee Hotlines (if available), which shall be properly investigated.

FPG Insurance prohibits retaliation against any employee for reports made in good faith, while it also protects the rights of the incriminated person.

Categories of Offenses

Level 1 Offense: **Minor Offense**

- No detrimental impact to the business; may be considered as light offenses.
- Minimal or with no financial loss.
- Low risk / low impact to the company, customer, and employee's security but compromises the Company's compliance to policies.
- Does not involve a question of integrity.
- Merits a penalty ranging from verbal reprimand to suspension.

Level 2 Offense: **Major / Serious Offense**

- Causes delay in operations and affects productivity and possible loss of opportunities.
- Compromises team effectiveness and relationships and level of service / work quality.
- Causes a considerable financial loss to the company.
- Has a medium risk potential of compromising the security of a customer, client and employees' information.
- Poses a real safety hazard and creates possible occasion for injury.
- Merits a penalty ranging from suspension (5 days or more) to dismissal.

Level 3 Offense: **Extremely Serious / Grave Offense**

- Disrupts continuity of work / operations and adversely affects public perception of the company.
- Causes heavy financially-impacting loss to the company
- Has a high risk impact and is considered a critical offense that has compromised the safety or security of customer information, the integrity of customer and /or employees.
- Results in physical harm to division points of contact and representative, visitors or employees.
- Creates a strong and serious doubt on the offender's integrity.
- May merit up to a maximum penalty of termination of employment.

Corrective Actions

- The IRR does not cover all acts or omission which run contrary to the acceptable standards of behavior. With respect to such acts or omissions, they shall be dealt with by analogy.
- In certain instances and/or work locations, the subject acts or omission which cannot be found in the IRR may be defined and treated through standing instructions, policies or rules and regulations. These instructions, policies or rules and regulations shall form part of this IRR.

Verbal Counselling

Where the erring employee's immediate superior:

- Reminds and advises him of the acceptable standard of behavior in relation to an act or omission he committed.
- Embodies such advise in a memo to be addresses to the employee, cc, 201file.
- Agrees with and assists him in correcting the act or omission he committed to make it conform with the acceptable standard of behavior.
- Monitors future conduct to obviate his commission of the same act or omission.

Written Counselling

Where the erring employee's immediate superior:

- Reminds and advises him in writing of the acceptable standard of behavior in relation to an act or omission he committed.
- Agrees with him that in case of subsequent commission of the same act or omission, a stiffer corrective action shall be taken.
- Assists him in correcting the act or omission he committed to make it conform with the acceptable standard of behavior.
- Monitors future conduct to obviate his commission of the same act or omission.

Suspension and Dismissal

Where the erring employee's immediate superior:

- Counsels him of the acceptable standard of behavior in relation to an act or omission he committed.
- Temporarily relieves him from work for a certain number of working days to allow him to contemplate, plan and adopt a resolution and specific course of action to correct the act or omission he committed to make it conform with the acceptable standard of behavior.
- Assists him in correcting the act or omission he committed to make it conform with acceptable standard of behavior.
- Monitors his future conduct to obviate his commission of the same act or omission.

Preventive Suspension

- May be Imposed when the employee's continued presence in the workplace poses a serious and/or imminent threat to the life &/or property of FPG Insurance or co-employee or will unduly prejudice the administrative investigation. In addition, this may also be proper upon assessment of his immediate superior, his Head with Human Resources ,and with prior approval of the FPG Insurance President & CEO.
- **Procedure.** The Notice of Preventive Suspension is incorporated in the Memo to Explain. The suspension takes effect immediately following receipt of the said Notice.
- **Period of preventive suspension.** Employees may be placed on preventive suspension for a period of thirty (30) days without pay. After such period, in case the situation calls for the continuance of such preventive suspension, the employee may still continue in preventive suspension with pay and full benefits.

Effect of mitigating and aggravating Circumstances

The presence of any or all of the following serve to lower the penalty:

- Exemplary record of service with the Company.
- No substantial damage or loss to the Company.
- Employee did not benefit from the offense.
- Voluntary admission by the Employee.
- Sufficient provocation, threats, intimidation.
- Length of service.

The presence of any or all of the following raises the penalty:

- Previous record of similar offense within the past two (2) years.
- Multiple or habitual misconduct or habitual tardiness or habitual absence.
- Motivated by a reward or personal gain in the commission of the offense.
- Premeditation and/or conspiracy.
- Occupies a position of trust and confidence.
- Offense committed under the influence of dangerous drugs, or alcohol.

Offenses not specifically found in the IRR

The severity of Disciplinary Action is determined by:

- The nature of the misconduct, breach, violation, or impropriety.
- The impact or potential impact/seriousness/gravity of the same on customers, employees, or company.
- Whether it is a repeat violation/offense (even of a different type).
- The aggravating and/or mitigating circumstances attendant to the violation.

Ageing of Offenses

- Records in the employee's 201 File reflecting the imposition of disciplinary penalties shall age and have no effect whatsoever after the lapse of the following periods:
 - a. Five years, or sixty months, for acts or omissions where the actual corrective action imposed is suspension of 4-7 days.
 - b. Two years, or twenty-four months, for acts or omissions where the actual corrective action imposed is suspension of 1-3 days.
 - c. One year or twelve months for acts or omissions where the actual corrective action imposed is Written or Verbal Counselling.
- The determination of which disciplinary penalties shall be considered to have aged and thus of no effect whatsoever shall be done by counting from the date of commission of the latest offense backwards up to the end of the ageing period.

Due Process

- **Two notice rule:** Notice to explain
Notice of sanction/acquittal
- **Appeal :** To the next higher authority (Ex: Vice President) within five (5) working days from receipt of the disciplinary action.
- Appeal must present new evidence that did not surface during the investigation which may mitigate the sanction meted out to the employee or such sound and valid reason why the employee thinks he/she was unjustly sanctioned, and/or other analogous circumstances/situations).
- An employee who has been meted out the sanction of Termination of Employment may appeal the decision to the President within five (5) calendar days from receipt of the disciplinary action.

Conflict of Interest

Conflict of Interest, Insider trading, Anti-Trust	1 st Time	2 nd Time	3 rd Time	4 th Time	5 th Time	6 th Time
I. Advancing one's personal gain over Company's where conflict of interest is involved; e.g. obtaining loans from business partners, favoring certain suppliers in company purchases and in its advertising and promotional activities.	Written Counselling	1-3 days DL	4-7 days DL	Written		
A. Outside Employment and other Outside activity						
I. Failure to disclose or seek approval from immediate manager in cases of potential conflict of interest arising where necessary, following engagements or activities outside FPG employment.	Written Counselling	1-3 days DL	4-7 days DL	8-10 days DL	Dismissal	
B. Acceptance of Gifts, Meals, and Entertainment						
I. Solicitation of favors, gifts, loans and other incentives as inducement for an employee or favor a business partner or third party to the prejudice of company interest.	Written Counselling to Dismissal	Dismissal				
II. Offer or tender of gifts, favors, loans and other inducements to business partners or third parties dealing with the company to secure favors or special concessions.	Written Counselling to Dismissal	Dismissal				
III. Acceptance of high value items such as watches, cellular phones, appliances, furniture, trips and travel, monetary, including gift certificates and frequent meals.	Written Counselling to Dismissal	Dismissal				
C. Business Dealings						
I. Non-Competition						
a. Engaging in business opportunities discovered in the course of employment with the Company where employee directly competes with the Company.	Written Counselling to Dismissal	Dismissal				
b. Securing and realizing personal gain in transactions involving the Company and its business partners.	Written Counselling to Dismissal	Dismissal				
II. Confidential Information						
a. Unauthorized disclosure of confidential information and documents, including those in electronic form.	Written Counselling to Dismissal	Dismissal				
b. Negligence in storing and transmitting confidential information that leads to inadvertent disclosure.	Written Counselling to Dismissal	Dismissal				
c. Employing unfair means to obtain or gain access to confidential information of competitors or third parties, or when the information was obtained by an employee in the course of previous employment, in order to gain advantage over the said competitors or third parties.	Written Counselling to Dismissal	Dismissal				

Performance and Attendance

Performance and Attendance	1 st Time	2 nd Time	3 rd Time	4 th Time	5 th Time	6 th Time
I. Loafing, Loitering, attending to personal chores during official office hours; Quitting work before scheduled time without permission, and other similar situations	Verbal Counselling	Written	1-3 days Suspension	4-7 days	8-10 days	Dismissal
II. Negligence, carelessness or inattention to work resulting in delay or damage to the Company's reports, services, products, or properties.	Written warning,	2 days suspension,	Dismissal			
III. Non-Performance of duties and responsibilities, based on agreed objectives with superior, or as indicated in the job description or any documented material; as reflected in two failed consecutive Personal Improvement Plan (PIP).	Dismissal					
Field Work						
* Non-adherence to master schedule of itinerary	Written Counselling	1-3 days suspension	4-7 days suspension	8-10 days	Dismissal	
Attendance						
a. Absence Without Official Leave (AWOL) - Cumulative within one year						
• absence without permission						
• absence without notice						
• absence despite prior denial of request for permission to go on leave						
• malingering						
i. 1st DAY AWOL	Written Counselling					
ii. 2nd to 3rd DAYS AWOLs	1-3 days DL	Dismissal				
iii. 4th to 6th DAYS AWOLs	4-6 days DL	Dismissal				
iv. 7th to 10th DAYS onwards AWOL	7-10 days DL	Dismissal				
v. 11th DAYS onwards AWOL	15 days DL to Dismissal					
b. Tardiness - five (5) times of unexcused tardiness or an accumulation of 45 minutes within one (1) month.	Verbal Counselling	Written	1-3 days Suspension	4-7 days	8-10 days	Dismissal
Registering false time-in/time-out on behalf of co-employee; swiping co-employee ID card or encoding co-employee's number to register co-employee's time-in/time-out/ instructing another employee to do these acts	4-7 days suspension	8-10 days suspension to Dismissal depending on gravity of offense	Dismissal			

IT and Communications

IT & Communications	1 st Time	2 nd Time	3 rd Time	4 th Time	5 th Time	6 th Time
I. Unauthorized use of USB devices, CDs, or other application systems/materials which may cause major damage to the company's IT system	8-10 days suspension to Dismissal depending on the gravity of offense	Dismissal				
II. Sharing of own access code to other without authorization from Manager.	Written Counselling	1-3 days suspension	4-7 days suspension	8-10 days		
III. Accessing of restricted information without proper authorization.	1-3 days suspension	4-7 days suspension	8-10 days suspension to Dismissal			
IV. Bypassing Information Systems Security for unauthorized purposes (e.g. hacking).	Dismissal					
V. Use of IT assets and/or facilities for personal use or gain (e.g. LCD projector, saving and forwarding of chain e-mail, junk mail, unofficial ads, false information, etc.).	Written Counselling	1-3 days suspension	4-7 days suspension	8-10 days		
VI. Unauthorized use of personal email account for business transactions and communication	Written Counselling	1-3 days suspension	4-7 days suspension	8-10 days		
VII. Introducing or using of unlicensed or non-FPG approved software or materials (e.g. pirated software, copyrighted media files & images, etc.).	1-3 days suspension	4-7 days suspension	8-10 days suspension	Dismissal		
VIII. Piracy of Company licensed software or materials.	8-10 days DL to Dismissal	Dismissal				
IX. Introducing, storing, or circulating of pornographic images or other morally offensive materials.	4-7 days suspension	8-10 days suspension	Dismissal			
X. Damage or destruction of critical computer files or applications through negligence.	Written Counselling	4-7 days suspension	8-10 days suspension to Dismissal			
XI. Deliberately causing damage or destruction, or tampering of critical IS/IT resources.	Dismissal					
XII. Unauthorized use of IS/IT facilities (eg. e-mail, internet, intranet, etc.) resulting in damage to the Company.	4-7 days suspension to Dismissal					
XIII Tampering of critical IT facilities (network, server, etc.).	Dismissal					
XIV Selling of or use of Esignatures and other formatted templates of internal documents in aid of Phishing	Written Counselling to Dismissal					
XV. Any other acts or omissions analogous to the above provisions.	Written Counselling to Dismissal					

Safety, Security, Health, and Environment

Safety and Environment	1 st Time	2 nd Time	3 rd Time	4 th Time	5 th Time	6 th Time
I. Horseplay/disorderly behavior which may cause injury to self and other person, damage to property, and pollution to environment within the Company premises and company sponsored activities outside of the premises.	Verbal Counseling	Written Counseling	1-3 days suspension	4-7 days suspension	8-10 days suspension to Dismissal depending on gravity of offense	Dismissal
II. Failure to observe or comply with standing safety rules and procedures.	Written Counseling	1-3 days suspension	4-7 days suspension	8-10 days suspension to Dismissal depending on gravity of offense	Dismissal	
Tampering, destruction/misuse or removing fire fighting equipment like fire extinguishers, hoses, hydrants, etc. from their proper locations.	8-10 days suspension to Dismissal depending on the gravity of offense	Dismissal				
Waste of resources (such as water, electricity, etc.).	Written Counseling	1-3 days suspension	4-7 days suspension	8-10 days suspension to Dismissal depending on gravity of offense	Dismissal	
III. Unauthorized operation of Company vehicles, machinery and other equipment.	1-3 days suspension	4-7 days suspension	8-10 days suspension to Dismissal depending on gravity of offense	Dismissal		
IV. Possession of or drinking liquor/alcoholic drinks during working hours or reporting for work or working while under the influence of liquor or while intoxicated.	Sent Home and deemed AWOL (c/o AWOL Provisions)	Dismissal				
V. Gambling in any form inside company premises	Dismissal					
VI. Smoking in non-smoking areas	Written Counseling	4-7 days suspension	8-10 days suspension	Dismissal		
VII. Eating foul or pungent smelling food in areas where eating is not allowed	Written Counseling	4-7 days suspension	8-10 days suspension	Dismissal		
VIII. Provoking, threatening, using abusive or profane language on another, whether co-employee, visitor or guest with bodily harm or injury.	Written Counseling	4-7 days suspension	8-10 days suspension to Dismissal depending on the gravity of offense	Dismissal		
Security						
I. Fighting or inflicting bodily harm or injury on another, whether co-employee, visitor or guest.	4-7 days suspension	8-10 days suspension to Dismissal depending on gravity of offense	Dismissal			
II. Interfering with or refusing to cooperate with the security guards, or with designated employee in charge of security, in the performance of the latter's duty.	8-10 days suspension	Dismissal				
III. Unauthorized entry to company premises after work hours or non-work days.	Written Counseling to Dismissal, depending on gravity of offense					
IV. Unauthorized possession of firearms, long knives, explosives and other deadly weapons within Company premises.	Dismissal					
Drug Abuse Policy						
I. Refusal/ Willful resistance/ Failure to submit to drug testing at the required time.	4-7 Days suspension	Dismissal				
II. Possession of prohibited drugs or substances, paraphernalia, use, distribution, or sale of illegal drugs or regulated drugs beyond what is medically-prescribed within Company premises or while participating in any Company sponsored activity.	Dismissal					
III. Violation of Drug Rehabilitation Program.	Dismissal					
IV. Failure to return to work upon expiry of approved Rehabilitation Plan.	Dismissal					
VI. Testing positive for illegal drug use for a second time.	Dismissal					
Health measures in the workplace (Applicable to all Health & Safety protocols coming from the DOH and WHO)						
Failure to observe physical distancing, frequent handwashing and use of disinfectants, use of facial masks while in office premises as required by public health authorities.	Verbal warning	4-7 days suspension	8-10 days suspension	Dismissal		
Failure to disclose health condition or possible exposure to or infection with contagious disease at the earliest opportunity	Employee to be referred to and escorted to appropriate medical facility					

Harassment, Fraud, and Bribery

Harassment and Discrimination	1 st Time	2 nd Time	3 rd Time
I. Acts that transform the workplace into an intimidating, offensive, insulting and hostile work environment.	Verbal Counselling	Written Counselling to dismissal depending on gravity of offense.	
II. Sexual harassment as defined by law that includes but not limited to: demands, requests, favors when the same is made as a requisite for hiring, employment, promotion, choice of assignment, business transaction or refusal thereafter results in discrimination or harassment.	4-7 Days suspension to Dismissal depending on the gravity of offense	Dismissal	
Fraud and protecting company's Assets and Accounting			
I. Deliberately giving false statements, testimonies or withholding information during investigation conducted by the Company.	8-10 days suspension to Dismissal depending on gravity of offense	Dismissal	
II. Deliberately giving false or fictitious data or information during audits conducted by the Company or an external party.	8-10 days suspension to Dismissal depending on gravity of offense	Dismissal	
III. Taking of, misappropriating or converting funds, resources or property belonging to the Company, another employee or third party for personal gain and benefit.	8-10 days suspension to Dismissal depending on gravity of offense	Dismissal	
IV. Falsifying, altering or tampering with Company records pertaining to personal information.	8-10 days suspension to Dismissal depending on gravity of offense	Dismissal	
V. Falsifying, altering or tampering with required documents to support the availment of Company benefits.	8-10 days suspension to Dismissal depending on gravity of offense	Dismissal	
VI. Falsifying, fabricating, altering or tampering of Company documents, reports and data to cover-up for inaccuracy, inefficiency or negligence.	8-10 days suspension to Dismissal depending on gravity of offense	Dismissal	
VIII. Submitting fictitious, padded or tampered documents in support of claims for reimbursement or liquidation of expenses.	8-10 days suspension to Dismissal depending on gravity of offense	Dismissal	
IX. Fraudulent or any dishonest conduct involving the property or assets or the financial reporting and accounting of any third party or business partner.	8-10 days suspension to Dismissal depending on gravity of offense	Dismissal	
X. Misrepresentation or dishonesty in order to avail of or participate in Company sponsored/subsidized activities or programs.	1-3 days suspension	4-7 days suspension	Dismissal
XII. Vandalism	Written Counselling	4-7 days suspension	Dismissal
XIII. Causing destruction, damage, loss or wastage of Company property through gross negligence.	Written Counselling to dismissal depending on gravity of offense with payment for portable electronic items	4-7 days suspension to Dismissal depending on gravity of offense with payment for portable electronic items	Dismissal with payment for portable electronic items
XIV. Deliberately causing destruction, damage or wastage of Company property.	8-10 days suspension to Dismissal depending on gravity of offense with payment for portable electronic items	Dismissal with payment for portable electronic items	
XV. Sabotage or deliberately downgrading Company materials and products.	Dismissal		
XVI. Deliberate misstatement of accounting information (e.g receivables, inventory, payables, bank reconciliation, etc.) resulting in gross inaccuracy of financial records, to cover-up shortages or to obtain personal gain and other analogous purposes.	8-10 days suspension to Dismissal depending on gravity of offense	Dismissal	
Bribery and Corruption			
I. Offering, promising or giving, directly or indirectly, of any personal or improper financial or other advantage in order to influence the decision of a third party, public or private.	Verbal Counselling to Dismissal depending on gravity of offense	Dismissal	

Others

Manufacturing Related	1 st Time	2 nd Time	3 rd Time	4 th Time	5 th Time	6 th Time
I. Gambling in any form within Company premises.	Written Counselling	4-7 days DL	Dismissal			
II. Insubordination (Deliberate refusal to follow lawful order by a superior).	4-7 days suspension	8-10 days suspension to Dismissal depending on gravity of offense	Dismissal			
III. Intimidation, disrespect, malicious imputations, insult or use of foul language towards a co-employee or visitor.	4-7 days suspension	8-10 days suspension to Dismissal depending on gravity of offense	Dismissal			
IV. Indecent or scandalous behavior.	4-7 days suspension	8-10 days suspension to Dismissal depending on gravity of offense	Dismissal			
V. Engaging in indecent and scandalous behavior while representing the Company.	8-10 days suspension to Dismissal depending on gravity of offense	Dismissal				
VI. Commission of five (5) or more different acts or omissions listed herein within a period of twelve (12) months.	4-7 days suspension	Dismissal				
VII. Instigating boycotts of Company products.	8-10 days suspension to Dismissal depending on gravity of offense	Dismissal				
VIII. Deliberate and malicious disruption of Company operations.	8-10 days suspension to Dismissal depending on gravity of offense	Dismissal				
IX. Malicious imputations on the Company that causes or tend to cause dishonor to its good name and standing.	8-10 days suspension to Dismissal depending on gravity of offense	Dismissal				
X. Final conviction of a serious criminal offense resulting in damage of the good name and standing of the company and/or its normal business operations being unduly hampered	Dismissal					



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