

 Supersedes Policy Ref. No.: Version 2020		Document Type: Policy Title: Code of Conduct	No. of Pages: 11
			Document Code: GIBCO-2025-DG-001
Memo Dated: August 24, 2017		Status: Revised	Effectivity Date: July 01, 2025
Compiled and updated by: Kathleen N. Bernardo Audit & Risk Officer		Reviewed by: Mary Ann Dolores/ Marachell Medina Human Resources Department	Approved by: Gianjira Marielle So-Limjoco CEO/ President

INTRODUCTION

The Management expects all employees to conduct themselves in appropriate manner. All employees must work together to maintain an efficient and disciplined workforce. Employees are expected to conduct themselves professionally and always treat each other with courtesy and respect.

Employees should always be discreet and professional in all conversations. Talking aloud or laughing in the workplace should be avoided. Personal conversations should be kept to a minimum while in the workplace.

The spreading of rumors, gossip, comments other employees and management are not allowed. Any grievance by an employee should be directed to the concerned person or to seek the assistance of HR Representative in case of misunderstanding.

Only upbuilding and wholesome jokes are allowed within the workplace. Offensive jokes may be sanctioned under the company's disciplinary policy. As an employee of GIBCO, I must conduct oneself with responsibility, integrity, and accountability. It means communicating effectively and appropriately and always finding a way to build harmony, cooperation, and good rapport among co-employees.

Employees are expected and required to report to work on a condition to perform their responsibilities safely and must remain in such condition while at work.

RESPONSIBILITY

The Department Head, together with the HR Representative, shall be responsible for overseeing the correct implementation and implementation of the Company's Code of Conduct.

PROCEDURE

Counseling to Support Effective Performance and Behavior

Supervisory counseling with staff is an expected preliminary step prior to corrective action and should be conducted when a staff member has not adhered to the expected Standards of Conduct or when a Department Head deems it necessary to bring an employee's performance to an expected level.

Each Manager has the responsibility of counseling his or her subordinate to try to modify behavior and to administer corrective action when appropriate. All corrective actions must be documented.

The following principles apply to supervisory counseling actions at GIBCO:

- The standards of conduct and performance should be communicated to each staff member in a variety of ways (i.e. through reviews of the GIBCO Employee Handbook and with regular discussions between the Department Heads and the employee).

- Standards of conduct and performance are reasonably related to the orderly, efficient, or safe operation of work at GIBCO or its departments.
- A timely, fair, and objective review will always be completed before the decision to take corrective action is made.
- Consultation with the HR representative and a representative of employee and Quorum is required before implementing corrective action that involves an employee member's conditions of employment or involuntary termination.
- Consultation with the HR representative or a representative of employee and Quorum is strongly encouraged for all other corrective actions.
- Initial and early performance discussions should occur between the employee, Manager, and HR. The Managers should explain why the performance problem and/or counseling is occurring and should define the impact the problem is having on the employee's department and/or coworkers.
- Managers should outline the steps necessary to correct performance and/or conduct deficiencies and should also document these steps using the Performance Improvement Plan document.
- Managers should schedule timely and regular follow-up meetings for constructive feedback.
- Managers must ensure that all employees are encouraged to use employee assistance as an aid to improve or correcting performance and/or behavior.
- If an employee work performance or behavior continues to need improvement or if a GIBCO policy has been violated, corrective steps should be taken to modify and improve behavior based on the nature and severity of the issue, the frequency with which the problem has occurred, and any extenuating circumstances.

CORRECTIVE ACTION

GUIDELINES

In determining the proper course of corrective action, the Department Heads may repeat, modify, or omit a level of disciplinary action based upon the facts of the specific case. For example, in the case of serious misconduct, immediate termination of employment may be warranted. "Serious misconduct" is defined as any action committed by an employee that includes - but is not limited to - the violation of laws, and/or GIBCO policies, procedures, and practices; theft; assault; fighting; unethical conduct; safety violations; harassment; possession/concealment of weapons; possession, use, sale, or purchase of illegal drugs or illegal intoxicants; falsification or improper alteration of records (including time cards/records); and/or disclosure or misuse of confidential information.

DOCUMENTATION

All corrective actions, counseling discussions, and related facts must be documented - with one copy of all documents provided to the employee and one filed in the employee's 201 file. The HR representative will assist Managers in recording appropriate documentation for counseling discussions, written warnings, and terminations.

CORRECTIVE ACTIONS PROTOCOL

GIBCO has designed its corrective-action protocols to identify and correct problems or behaviors that affect the work performance of employee. The proper steps for corrective action must be handled consistently within and across each department and for each problem.

GIBCO's "corrective action" processes include the following actions:

Written Warning - This protocol documents discussions between a manager and employee who fails to meet performance or behavioral expectations. Under most circumstances, written warnings occur before more progressive corrective actions are undertaken by Managers.

Final Written Warning or Suspension- This plan of corrective action documents discusses between a manager and employee who continues to fail to meet performance or behavioral expectations after receiving a written warning. This action includes disciplinary action or suspension that provides for temporarily removing employee from the workplace (preventive suspension) for serious misconduct pending further investigation. Before employee is suspended, the Manager must consult with the Admin/HR representative or Labor representative to discuss the circumstances.

Termination- Terminations occur after written warnings are issued to employee continuing to fail to meet performance or behavioral expectations. Terminations must be reviewed by the Admin/HR representative and Labor Relations prior to a final dismissal.

GIBCO intends its corrective-action policies and procedures to be progressive. However, depending on the situation, Managers are permitted to repeat, omit, or employ any corrective action plan out of the progressive sequence.

All corrective actions are determined on a case-to-case basis by individual departments and by GIBCO's Admin/HR Representative and Labor Relations.

Employees who are absent for three consecutive, scheduled workdays without contacting an immediate Manager will be considered as having abandoned their position(s) at GIBCO and will be terminated after due process.

CORRECTIVE ACTION TRACKS: ATTENDANCE AND BEHAVIORAL/PERFORMANCE

Attendance, behavioral and performance issues are addressed in separate tracks. For example, an employee who has been issued a written warning for a performance/behavioral issue would receive another, separate warning for an attendance problem that warrants corrective action. If attendance is corrected but the performance/behavior continues at below expectations, a final written warning for performance may be warranted. See the chart below to confirm the appropriate corrective action track.

SUSPENSIONS

Disciplinary Suspension

In the case of serious misconduct, it may be necessary to protect the safety and security of the workplace by suspending the employees involved and removing them from the workplace. This corrective action is unpaid.

Preventive Suspension

Prior to discharge, an employee may be suspended, pending investigation of the facts, to determine whether termination is the appropriate course of action. While the Manager is considering termination, the employee concerned may be relieved from work and suspended from employment pending a full investigation of the circumstances. Suspension pending investigation is unpaid.

The investigation may have one of the following results:

- If the circumstances do not justify the suspension, the employee will be paid for the period of the suspension and be returned to the workplace, although other corrective action may be taken.
- If the circumstances do not justify termination but are serious and justify disciplinary suspension, the employee may not be paid for the period of the suspension; or other corrective actions may be issued; or
- If the circumstances justify termination, the employee will be dismissed, and a final payment will be issued.

CATEGORIES OF MISCONDUCT

GROUP I

1.	Failure to comply with the prescribed procedure in notifying the Company of his / her absence or tardiness.
2.	<p>Failure to report to work on time or comply with project / deal specific procedures on attendance:</p> <ul style="list-style-type: none"> a) Failure to report to work within the 15-minute grace period shall be recorded as tardiness. Accumulated instances of tardiness, regardless of the number of minutes, occurring three (3) times on non-consecutive days within one cut-off period shall be considered as one fraction. b) 18 accumulated instances of tardiness within a rolling 12-month period will be treated as gross and habitual neglect of duties.
3.	<p>Unauthorized act of spending time or leaving work during official work hours to perform non-work-related activities, such as but not limited to:</p> <ul style="list-style-type: none"> a) Habitual under-time. b) Excessive extension of meal break and extended restroom breaks c) Loitering d) Malingering or pretending to be sick to avoid work e) Failure to comply with the requirements of flexible work arrangements f) Selling or conducting personal business
4.	Non-compliance with Company dress guideline
5.	Other cases analogous to the foregoing

GROUP II

1.	Sleeping during work hours or training
2.	Failure to comply with procedures, policies and guidelines on Time and Expenses reporting
3.	<p>Failure to comply with assigned responsibilities such as but not limited to:</p> <ul style="list-style-type: none"> a) Failure to follow work procedure according to the given job description b) Failure to follow ISO procedures c) Timely reporting of AWOL cases
4.	Refusal to follow or comply with reasonable and lawful work-related orders, instructions and directives.
5.	Gross or habitual negligence in the performance of assigned task or duties
6.	Other cases analogous to the forgoing
7.	Acting in a disorderly, boisterous, rowdy or unruly manner within work premises, or during Company-sponsored events that cause disturbance to other individual
8.	Spreading or sharing disparaging or malicious information through any act or means of communication against employees
9.	Discourtesy or rudeness to employees
10.	<p>Acts that misuse or waste Company or client resources, such as but are not limited to:</p> <ul style="list-style-type: none"> a) Inappropriate email signature in Company or client systems; b) Sending mass mailing or chain letters c) Use of Company email for non-work-related matters. d) Excessive chatting; internet surfing or playing offline games e) Excessive personal phone calls f) Playing online / networking games g) Use of client email for personal reasons.

	Opening unauthorized websites on the internet
11.	Non compliance to Company guidelines on appropriate and responsible use of Company property such as but not limited to: <ul style="list-style-type: none"> a) Leaving laptops unattended b) Loss of Company assets due to negligence
12.	Non-compliance with Company branding guidelines including but not limited to: <ul style="list-style-type: none"> a) Use of Company logo in non-related media like social sites and blog sites. b) Use of GIBCO name or logo in any promotional materials without the proper authorization.
13.	Non-compliance with Company and client security policy requirements, such as but not limited to: <ul style="list-style-type: none"> a) Failure to badge in and out of Company premises or workplace upon entry or exit; b) Failure to comply with Clean Desk policy. c) Use or possession of prohibited or unauthorized items to work area
14.	Refusal to comply with the health and wellness regulations of the Company such as but not limited to: <ul style="list-style-type: none"> a) Failure or refusal to undergo prescribed annual physical medical checkup or to undertake medical examinations as prescribed by accredited Company physicians
15.	Failure to adhere to Company security policies and procedures on physical assets such as but not limited to: <ul style="list-style-type: none"> a) Unauthorized bringing in of personal laptops. b) Violations on project specific security policies on data classification and handling guidelines such as proper labelling.
16.	Failure to immediately escalate security incidents or policy violations to the appropriate teams such as but not limited to: <ul style="list-style-type: none"> a) Unintentional introduction of viruses and failure to immediately log off from the Company network and report incident.

GROUP III

1.	Taking part in any form of gambling within Company or client premises or during Company sponsored activity using Company property to take part in gambling. Exemption is games authorized by leadership and or organized for project/deal/community engagement purposes.
2.	Any unprofessional act committed within work premises or during Company sponsored events, including but not limited to: <ul style="list-style-type: none"> a) Inappropriate acts of sexual nature b) Disruptive acts that affect work operations or output
3.	Any form of dishonesty, including but not limited to: <ul style="list-style-type: none"> a) Misrepresentation of qualifications b) Misrepresentation of self as a Gibco authorized representative c) Falsification of Company records or documents d) Cheating on time or work output records e) Providing any false or misleading information to any Company employee, investigation or inquiry

4.	Conviction for or involvement in any criminal offenses, in which the act committed hampers one's ability to perform assigned work and/or is prejudicial to the interest of the Company or its employee
5.	Engaging in any activity which is in conflict with the interest of the Company or its clients, such as but not limited to: <ul style="list-style-type: none"> a) Unauthorized dual employment b) Unauthorized solicitation
6.	Possession or use of illegal drugs, substances or paraphernalia while working, representing the Company or at an event associated with the Company, its clients or suppliers, within the Company or client premises or coming to work under the influence of illegal drugs or substances.
7.	Committing (or attempting to commit) reckless or intentional acts of violence that may inflict harm and injury to any person within work premises or during Company-sponsored events. Such acts included but not limited to, provoking quarrels and fighting
8.	Reporting for work while under the influence of alcohol or intoxicating substance or consuming alcoholic or intoxicating drinks within Company or client premises. An exception is the responsible consumption of alcohol during authorized Company functions or events.
9.	Any act of harassment (sexual or otherwise); or any other threatening or intimidating behaviour directed towards a colleague, vendor, visitor or client of the Company that undermines the confidence and self-esteem of the recipient
10.	Use of Company or client computer resources for unprofessional purposes such as but not limited to: <ul style="list-style-type: none"> a) Accessing internet sites with pornographic or inappropriate content b) Downloading, storage or distribution of profane / discriminatory / pornographic / defamatory / libelous or other similarly inappropriate or unlawful materials
11.	Any act that constitutes abuse of authority or position
12.	Intentional and unintentional acts that negatively affect the Company's and / or client's or vendor's reputation and goodwill of the Company
13.	Other cases analogous to the foregoing
14.	Any reckless, negligent or intentional act or omission that leads to or can cause damage, destruction or loss of property belonging to the Company, its employees, clients, guests or service providers. Including but not limited to: <ul style="list-style-type: none"> Failure to protect mobile devices containing Company Information
15.	Unauthorized use or possession of property or resources belonging to the Company, client, employees, service providers or guests; or any unauthorized act which commits such resources to other individuals or entities.
16.	Any act (or attempted act) to: <ul style="list-style-type: none"> a) Misappropriate GIBCO / client funds; b) Claim fraudulent benefits and expenses; Steal money, property or anything of value from the Company, client, other employees or Company visitors.

A. Health, Safety and Physical Security

1.	Disregard of office regulations on safety, sanitation and orderly conditions of the workplace such as but not limited to: <ul style="list-style-type: none"> a) Playing or tampering with fire extinguishers, fire alarms or smoke detectors b) Unauthorized use of fire exit stairwells c) Unauthorized access to restricted areas d) Tampering with any security and safety devices
2.	Violating the Company's health and wellness regulations by smoking in "non-smoking" or unauthorized areas;
3.	Non-disclosure of having been diagnosed with an infectious disease or reporting for work while knowingly suffering from an infectious illness.
4.	Any action taken to gain or allow access to company or client premises without proper authorization
5.	Any act that would endanger the life and safety of other employees such as but not limited to: <ul style="list-style-type: none"> a) Possession or use of firearms, explosives or other dangerous or illegal items within work premises or during Company-sponsored events; b) Intentionally reporting false information to the Company such as calling with bomb threats
6.	Revealing or disclosing, whether intentionally or unintentionally or negligently, to any unauthorized persons confidential information of GIBCO and/or its clients, including but not limited to: <ul style="list-style-type: none"> a) Proprietary information b) Operational or transactional information c) Trade secrets d) Clients' and employees' personal information e) Information related to administrative proceedings f) All other information described, considered or treated as confidential.
7.	Disclosure of own personal account passwords or use of another's Company / client-assigned personal account information and security code or condoning / giving orders to commit such acts.
8.	Unauthorized accessing, downloading, duplication, dealing with, storing or possession of confidential Company or client information, or an attempt to do any of the aforementioned acts such as but not limited to: <ul style="list-style-type: none"> a) Attempt to store Company information on personal storage devices' b) Storing client information on local drives on PCs
9.	Any intentional or unintentional use of Company or client resources that violates the information security policies and regulations of GIBCO and /or its clients, such as but not limited to: <ul style="list-style-type: none"> a) Intentional introduction of viruses / malware; b) Hacking; c) Alteration of Gibco information systems and security tools like USB control, etc. d) Installation / downloading / use of unauthorized software e) Unauthorized downloading, storage or transmission of audio / video files, unless artist has expressed permission for their usage
10.	Other cases analogous to the foregoing

SANCTION:

GIBCO adopts a progressive method of sanction to give the employee concerned every opportunity to correct his/her deficiencies.

GROUP I OFFENSE					
Sanction Matrix	1 st written warning	2 nd written warning	3-day suspension	Final written warning	Recommendation for Termination of Service

GROUP II OFFENSE					
Sanction Matrix	1 st written warning	3-day suspension	Final written warning	Recommendation for Termination of Service	

GROUP III OFFENSE	
Sanction Matrix	Recommendation for Termination of Service

Note: The sanctions under this policy may be waived or modified by the Executive and Board of Directors, as he/she may deem appropriate or beneficial to either or both the company and the employee, taking into consideration the degree of offense/violation committed, the employee's disciplinary record and length of service, and the explanation given by the employee.

All Disciplinary suspensions will be unpaid.

ATTENDANCE RELATED VIOLATIONS

All absenteeism and tardiness related violations will progress to higher sanctions even if it is not a repeat violation and will be considered under the following manner with due process as outlined in this Section.

A. Tardiness and Missed Logs: one occurrence of late arrival will constitute as one instance.

Definition: Tardiness is defined as late arrival to work

- a. First instance: Oral Admonition
- b. Second instance: Written Reprimand
- c. Third instance: Written Reprimand (Final Warning)
- d. Fourth instance: 3 Days Suspension Without Pay
- e. Fifth instance: 5 Days Suspension Without Pay
- f. Six instances: 10 Days Suspension Without Pay
- g. Seventh instance: Recommendation for Termination of Services

B. Under-time: Three occurrences of under-time will constitute one instance.

Definition: Under time is defined as logging out of or leaving work before the end of the shift.

- a. First instance: Oral Admonition
- b. Second instance: Written Reprimand
- c. Third instance: Written Reprimand (Final Warning)
- d. Fourth instance: 3 Days Suspension Without Pay
- e. Fifth instance: 5 Days Suspension Without Pay
- f. Six instances: 10 Days Suspension Without Pay
- g. Seventh instance: Recommendation for Termination of Services

C. Unplanned Leave(s) of Absence(s): Any unplanned leave/absence with notification will fall under this category. One occurrence is equal to one instance.

Definition: Unplanned Leave/Absence is defined as calling in and advising the supervisor of the absence at least four hours before the specified shift.

- a. First instance: Oral Admonition
- b. Second instance: Written Reprimand
- c. Third instance: Written Reprimand (Final Warning)
- d. Fourth instance: 3 Days Suspension Without Pay
- e. Fifth instance: 5 Days Suspension Without Pay
- f. Six instances: 10 Days Suspension Without Pay
- g. Seventh instance: Recommendation for Termination of Services

D. No Call No Show (NCNS): Any Unplanned leave/absence without notification will fall under this category. One occurrence is equal to one instance.

Definition: No Call No Show is defined as absence without advising the supervisor or informing late (on or after the start of shift)

- a. First instance: Oral Admonition
- b. Second instance: Written Reprimand
- c. Third instance: Written Reprimand (Final Warning)
- d. Fourth instance: 3 Days Suspension Without Pay
- e. Fifth instance: 5 Days Suspension Without Pay
- f. Six instances: 10 Days Suspension Without Pay
- g. Seventh instance: Recommendation for Termination of Services

E. Absconding: One occurrence is equal to one instance.

Definition: An employee is considered absconding if he/she has 3 consecutive No Call No Show (NCNS) and is sent a Return-to-Work Order.

- a. First Instance: Final written warning
- b. Second Instance: Recommendation for Termination of Service.

POLICY NUMBER V. DISPUTE RESOLUTION

INTRODUCTION

GIBCO is committed to fair and equitable treatment for all staff. procedure has been established for fair, orderly, and prompt resolution of disagreements. Any claim arising out of or relating to employment policies will be settled in accordance with this procedure. The arbitration step of this procedure will be governed by the Department of Labor and Employment. Both the staff member and GIBCO are required to utilize this procedure to resolve disagreements falling within its scope.

RESPONSIBILITY

The filing of incident report or raising any office issues shall be kept confidential between concerned parties and will not cause any negative reflection on the complainant-employee or any employee participating in the process nor will affect performance evaluation, compensation or work assignment at GIBCO.

In circumstances in which the complainant-employee believes the corrective action policy has not been appropriately followed, he should escalate the issue to his department head or the Admin Manager, for assistance in trying to resolve the problem.

No grievance using the Dispute Resolution Process for reasons of (1) disagreement with a performance evaluation rating or (2) as result of a job classification or reclassification shall be entertained. Any dispute with performance ratings or job classifications should be reviewed by the staff member's department. The disputing employee should raise his dispute with his or her supervisor's superior.

PROCEDURE

Step I: Face to Face Discussion

- Employee who believe that an employment policy has not been followed are encouraged to try to reach a resolution with their Department Head. In the event the Staff and the Department Head are unable to resolve the dispute, the staff must file an incident report to the Admin Manager or HR Officer within ten (10) calendar days from the time of the incident causing the dispute.
- Once the incident report is filed and confirmed that the issue is valid, HR Officer will issue a Notice to Explain (NTE) to the reported employee with possible violation of the company policy.
- After the NTE and the explanation letter are received, HR Officer will forward the explanation letter to the complainant-employee and convene both the complainant-employee and the Department Head in an attempt to clarify and resolve the dispute.
- In the event the complainant-employee and the Department Head are unable to resolve the dispute informally, the complainant-employee and the Department Head will complete an Action Plan form outlining the dispute and the efforts made to resolve the dispute. Thereafter, the complainant-employee, the Department Head and the HR Officer shall meet to further attempt to resolve the dispute. If despite the meeting, the dispute remains unsolved, the Department Head will sign the Dispute Resolution Effort form, and the dispute may move to the next phase of the process.
- The complainant-employee may request the dispute be referred to the Executive Committee. The employee complainant must make the request for the Executive Committee within ten (10) calendar days from the date the Dispute Resolution Form has been signed by the Department Head. If the Department Head fails to or refuses to sign the Dispute Resolution Form, the Dispute Resolution Form shall be deemed to be signed after three (3) working days from meeting with the complainant-employee, Department Head and HR Officer.
- Outside Representation:

All disputes within the office shall be resolved internally, without the interference of an external legal counsel. Only in cases of involuntary separation would a representation by an external counsel of choice of either party be allowed.

- All expenses and costs of engaging the legal counsel shall be borne by the party being represented. In the case of the employee, the HR shall be notified of the choice to be represented by legal counsel. At least fourteen (14) calendar days before the date of the scheduled hearing. If the staff member chooses attorney's representation, management may, in its discretion, seek representation by an attorney on its behalf as well.

In no case will an attorney represent management at the hearing when an attorney does not represent the staff member.

NOTHING FOLLOWS