

RESPONSIVE HEALTH AND INSURANCE BROKERS, INC.

COMPANY CODE OF CONDUCT

I. TITLE: COMPANY CODE OF CONDUCT

11. RATIONALE

The company recognizes the need to preserve order and harmony within the organization through reasonable policies, rules and regulations and to impose disciplinary corrective measures as warranted.

Discipline is of fundamental importance to the welfare of the company and in achieving efficiency and effectiveness so necessary to corporate growth.

Thus, the following Company Rules and Regulations hereby promulgated to govern all employees of Responsive Health & Insurance Brokers, Inc.

111. OBJECTIVES

- A. To foster peaceful and harmonious relationship amongst company personnel and its clients.
- B. To provide corporate guidelines in the observance of the Company's Code of Discipline.
- C. To establish procedural guidelines on the implementation of disciplinary actions on erring employees.

IV. GENERAL PRINCIPLES

It is important to understand and uphold the spirit animating the implementation of this Code. Hence, penalties should be resorted to only when necessary and only to the extent necessary. Sanctions should be to correct unacceptable conduct and to restore integrity and discipline, never to serve as a mere reprisal or display of power.

Before administrative sanctions are applied, the parties are provided due process as mandated by the law.

Administrative actions are timely and appropriate.

Impartiality and open-mindedness should characterize the investigation and consideration of cases. In the application of sanctions, uniformity and fairness should be aimed for.

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The Company provides a discreet mechanism for employees to report policy violations to Management that an employee personally encountered or witnessed.

Through the Incident Reporting procedure, a whistle-blowing mechanism is provided to employees to alert the Company of policy and other types of violations among Company stakeholders.

A. DISCIPLINARY ACTION:

1. A measure or penalty imposed to stop or correct a wrongdoing of an erring personnel and to establish order and discipline in the company.

B. TYPES OF DISCIPLINARY ACTIONS

1. **REPRIMAND:** A written notice calling the attention of the offender to the offense, and warning him against repetition of such violation in the future. It is issued out by the immediate superior/ officer or by the Operations & Administration Department (OAD) to those who violate company rules.
2. **SALARY DEDUCTIONS/ FINES:** Penalties for under time, tardiness, loss or damage to property and the like may be accompanied by a fine or salary deduction. The salary deduction shall be equivalent to the employee's salary for the period of under time or tardiness or the current market value of the property lost or destroyed.
3. **RESTITUTION:** This penalty may be imposed along with any of the other penalties for cases of destruction of/ or damage to the property of the company, of its employees, clients or other parties doing business with the company and for cases of theft. The company may recover the amount involved by means of salary deductions, or in installments or by whatever means that shall allow the offender to pay the amount involved. Restitution however, shall in no way mitigate the other penalties attached to the infraction.
4. **SUSPENSION:** A physical detachment from service, for a designated period of time, without salary and benefits for the period of suspension. The terms of suspension shall be determined by the gravity of the offense committed. If personnel suspended without pay is subsequently exonerated of all charges, he shall be restored to his original position with full pay from the date of his suspension and without any adverse effect on his tenure of employment.
5. **FORCIBLE RESIGNATION:** The penalty for offenses normally punishable

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by dismissal but mitigated by consideration of other circumstances short of acts of dishonesty. In forcible resignation, the offender shall waive his right to benefits, which would normally accrue to him on retirement or separation for reasons other than for cause. However, he shall be given clearance for purposes of employment in other firms as in the case of voluntary resignations provided he satisfies all the conditions for a clearance.

6. **DISMISSAL:** A dishonorable separation of personnel from the service. In cases of dismissal, the personnel automatically forfeit all benefits, which would normally accrue on retirement or separation for reasons other than for cause.

VI. OFFENSES AND PENALTIES

All acts or omissions and constituting violations of established company procedures in the conduct of its business or other acts prejudicial to the interest of the Company are punishable offenses. These include crimes involving moral turpitude as well as other offenses or improper acts which adversely affect the good name of the company, whether or not these are explicitly defined herein.

A. CATEGORIES OF OFFENSES

The seriousness of an offense is determined by a combination of factors, which include the subject matter of the act, the degree of malice intended and the actual harm resulting.

1. An offense is considered **MINOR**, if it involves an infraction of a rule or procedure rather than of a moral precept; or represents more of an omission or an oversight than a positive wrongdoing; or represents rather a mistake or an act of negligence than a malicious intent; and which does not result in serious inconvenience either to another person or the company. Penalties for this offenses range from warning to 4 days suspension.

Offenses:

- Violations of Dress Code/ Uniform Policy.
- Habitual Tardiness
- Frequently receiving visitors during working hours for personal reasons or frequently making & receiving personal calls (except in case of emergency).

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2. An offense is of **SECOND DEGREE** if it implies a habitual disregard for established criteria of concern for the interests of the company and involves either repeated violations within a relative short time of what otherwise would be minor offenses, or the culpable commission or omission of an act which results in serious embarrassment or inconvenience to another person. Penalties for this offenses range from warning to 10 days suspension.

Offenses:

- Unauthorized Under-time
- Removal/ destruction of any matters posted on the bulletin boards.
- Indecent, lewd or immoral conduct as well as grossly indecent utterances within company premises.
- Discourtesy to co-employees.
- Failure to cooperate in harmony with other employees in consonance with the duties and responsibilities, which disrupts or affects the smooth operation of the business.
- Cutting work hours without prior request and authority from immediate supervisor.
- Inducing, encouraging, coercing, bribing co-employee's to violate the House Rules of the Company

3. An offense is of **FIRST DEGREE** if it is characterized by wantonness or gross negligence; or if it involves what is generally regarded as substantial matter (e.g., large sums of money, confidential information); or can be occasion for public scandal and consequent erosion of confidence (e.g., dishonesty, habitual drunkenness, immorality); or, is maliciously intended or deliberately planned (whether the intended harm is achieved or not); or, results in serious financial loss or administrative/operational difficulty or corporate embarrassment for the company; or seriously undermines duly constituted authority.

Penalties for these offenses range from 3 Days Suspension to forcible resignation of dismissal

Offenses:

- Violation of the Information Security Policy of the Company
- Removal / destruction of Company records, files or other documents without authority.

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- Borrowing Money or Soliciting Material Favors from Suppliers and Customers:
- Borrowing money indiscriminately from customers or from any person transacting business with the Company.
- Receiving fees, commissions, "kickbacks" from suppliers, client for having considered, patronized their products and services.
- Discourtesy and Insult - Discourteous or disrespectful behavior towards client, officers and co-employees of the company. Refusal to attend to, or embarrassing a client (includes quarreling with a client or officers whether in person or over the telephone).
- Smoking inside the office premises.
- Committing any other acts which would be scandalous in nature or in any manner disturb the peace and order within the company premises whether on-duty or off-duty.
- Threatening, intimidating or insulting co-employees.
- Flagrant discourtesy either by acts or words, use of disrespectful language, impolite or obscene language in addressing or speaking with co-employees. Insubordination - Willfully defying or disregarding company authority:
 - a. Refusing to cooperate with company superiors or representatives of the company.
 - b. Refusing to accept work, change of shift or work locations assigned by a superior/ officer or by Management.
 - c. Willfully refusing to render overtime despite a reasonable advance notice.
 - d. Willfully failing to carry out verbal or written job or work instructions issued by the immediate superior or any officer. Making false, vicious, malicious statements against the company or any of its personnel.
 - e. Refusal to leave place of work or the office premises when required to do so by a supervisor or company officer who is acting within his authority.
 - f. Other Acts of Insubordination

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- Leaving place of work or duty stations and going outside of company premises during designated working hours without authorization.
 - Malingering, feigning illness
 - Sleeping or unauthorized rest during Working Hours
 - Soliciting money or any other form of contribution for the benefit of any person whether employees or not, within the company premises without prior authorization from Management
 - Vandalism - Removing, tearing and mutilating or altering the contents and or form of any official posters, announcements, memo, circulars and other official company documents placed on a company bulletin boards by Management for dissemination of information to employees.
 - Holding of unauthorized meeting or attending unauthorized meeting during office hours either as a leader, member or spectator.
4. An offense is considered **GRAVE if it constitutes GROSS VIOLATION** of the company policies (written or unwritten) that may result to administrative or criminal liabilities. It also includes acts that are detrimental to the welfare of the company, its personnel and properties.

The penalty for this offense is immediate dismissal.

Offenses:

- Robbery, Theft, Pilferage, Misappropriation of funds and Deliberate Submission of Fraudulent Expenses Statement:
- Attempted or frustrated theft or robbery of Company property involving funds, equipment, supplies or the property of clients or co-employees, including accomplices or accessories to persons to be punished.
- Misappropriation, malversation or withholding of funds belonging to the Company and/or being an accomplice or accessory.
- Giving false testimony in any investigation or inquiry conducted in relation with or concerning any matter affecting the company's interest; suppression of evidence relative to any subject matter under investigation; or withholding of information to cover up any irregularity of offense committed.
- Making false statements of furnishing fraudulent information or documents in the application forms for employment, including withholding

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information intended to cover up any irregularity or offense committed.

- Committing any act that constitutes fraud / fraudulent activity towards the Company, shareholders, business partners, service providers, co-employees and other company stakeholders.
- Committing any act of sabotage on company property equipment or facilities.
- Abuse or damage to company property committed willfully or through negligence.
- Abuse or waste of tools, equipment, fixtures, property, supplies or goods of the company.
- Bringing home of tools, equipment, fixtures, property, supplies or goods of the company for personal use.
- Commission of an Act of Forgery, Fraud or Any other Act of Swindling or Estafa, Padding of Receipts, Deliberate Over charging in Reimbursements of Expenses, Shortchanging and Tampering Official Receipts
- Using the company's name in transactions for profit or using company time, premises, vehicles, tools equipment or materials for personal benefit unless otherwise authorized with proper written passes duly signed by the authorized signatories.
- Soliciting, collecting money or circulating petitions on company premises other than within the rules and regulations of the company company, officials and employees.
- Disorderly conduct, harassment of other employees (including sexual harassment) or use of abusive language on company premises.
- Engaging in any immoral or unethical practices within company premises or offering services to co-employees (like pimping, providing female companion, etc.), which are immoral or unethical in nature or engaging in any conduct, which violates common decency or morality.
- Showing or exhibiting of pornographic materials, pictures, films or literature within the company premises.
- Browsing of pornographic internet sites within the company premises.
- Conviction of Any Criminal Offense Under the Law

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- Pushing, selling, and supplying prohibited drugs to . employees or possession thereof inside the company premises.
- Financing (banker), acting as collecting agents and the like or engaging or inducing others to engage in any form of gambling in the company premises.
- Carrying, possessing or attempting to bring in firearms, explosives or dangerous weapons such as knives, bolos, dart "balisong" and the like inside the company premises without authorization from Management.
- Libel utterances of publication, which tend to cause dishonest, discredit, contempt or embarrassment of an employee, client or officers of the company.
- Bringing intoxicants or drugs onto the company premises, using intoxicants or drugs, having intoxicants or drugs in one's possessions, or being under the influence of intoxicants or drugs inside company premises at any time.
- Quarreling or assault committed inside company premises resulting in the infliction of bodily harm or injury to another, whether employee or guests or outside company premises but within company time, except in case of defense of one's self or another against provoked assault.
- Threats and Coercion - Threatening or intimidating with bodily harm or other illegal or immoral acts another employee or his family in connection with his job or against client within or outside company premises.
- Investing, instigating, provoking or participating in any riot or disorders, disturbance or in any illegal concerted activity resulting to the disruption or delay in company operations.
- Fighting, encouraging a fight or threatening, attempting or causing injury to another person on the premises.
- Abuse of Authority - Requiring subordinate employees to perform job work assignments or task not related to his official function, which directly or indirectly benefits himself or herself. Forcing or requiring any subordinate employees to perform illegal and or indecent acts.
- Gross Negligence - Causing damage to or loss of materials, parts of equipment or endangering the efficiency of machines or safety or personnel or disruption of operations through gross negligence, carelessness or inefficiency.

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- Neglect of duty or failure to meet a reasonable and objective measure of efficiency and productivity.
- Refusal of an employee to follow instructions or to perform designated work that may be required of an employee or refusal to adhere to established rules and regulations.
- Creating or contributing to unhealthy or unsanitary conditions or a condition hazardous to another person on the premises.
- Participation in any act of money laundering or terrorist financing activities as a Company employee and / or in a personal capacity.
- Betrayal of Company's trust
- Abandonment of Work

VII. ADMINISTRATIVE SANCTIONS AND SCHEDULE OF PENALTIES

Listed are the degrees or frequency of the offenses and the corresponding penalties. Management shall not, however, be precluded from imposing appropriate penalties for offenses not included in the enumeration.

MINOR OFFENSES	PENALTIES
1 ST OFFENSE	1 ST Written Reprimand
2 ND OFFENSE	Final Warning
3 RD OFFENSE	1 Day Suspension
4 TH OFFENSE	2 Days Suspension
5 TH OFFENSE	3 Days Suspension
6 TH OFFENSE	4 Days Suspension
FIRST DEGREE OFFENSES	PENALTIES
1 ST OFFENSE	5 Days Suspension
2 ND OFFENSE	10 Days Suspension
3 RD OFFENSE	Dismissal or Forcible Resignation
GRAVE OFFENSES	PENALTIES
1 ST OFFENSE	Dismissal

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1. This Code of Conduct Discipline is not all-inclusive.
2. The company also desires to maintain high decency, morality and ethical standard within the organization. Should there be willful commission of act that violates decency, morality and ethical standards in whatever manner, concerned employee may be asked a forcible resignation.
3. There may be other acts of omission not explicitly contained herein but which are clearly prejudicial to the welfare/ interest of the Company. The Company reserves its right to consider them punishable and to impose appropriate sanctions/ penalties as warranted by the circumstance of each case.
4. The application of administrative sanctions and to ensure that disciplinary actions taken are neither too lax nor too severe.

VII. ISSUANCE OF MEMORANDUM

Using the standard format, the issuance of memorandum on violation of this code by any personnel shall always be coursed through the concerned Department I-lead.

VIII TERMS AND TERMINATION OF SERVICES

A. Terms of Employment Service

1. All new employees shall undergo a probationary employment period of six consecutive months. A probationary employee is one who is on trial performance period during which the employer determines whether or not he is qualified for employment. While the employer observes the fitness, propriety and efficiency of a probationary employee to ascertain whether he is qualified for permanent employment. The probationary employee on the other hand, seeks to prove to the employer that he has the qualifications to meet the reasonable standards for permanent employment.
2. The employee on probation shall be given either a permanent appointment or terminated on or before the expiration of the probationary period.
3. Should the employee fail to meet the reasonable standards or fail to qualify for permanent employment, the probationary period may be extended beyond six months through a mutual agreement to give the employee a second chance to pass the probation standards.
4. Before a permanent appointment can be considered, the immediate Supervisor and the Department Head shall appraise the employee's performance and shall

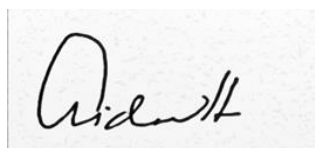
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give his recommendation in writing to the HR Department at least thirty (30) days before the date of probation expires.

5. In cases of re-hiring, the re-hired employees shall undergo a probationary period depending on the recommendation of the concerned Department Head.
6. Casual or Contractual/ Project employees are individuals hired on a temporary basis to meet business requirements of the Company.

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Recommending Approval:



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