



ST. PETER LIFE PLAN INC.

ST. PETERIAN CODE OF GOOD CONDUCT 2025

The 2025 St. Peterian Code of Good Conduct has been revised to include specific & current infractions that have been observed to be critical in delivering standard expectations and performance and in line with the digital initiatives.

POLICY STATEMENT

Our Company's rules, policies and procedures are designed to respect and protect the business interest, including but not limited to, properties and investments, profits, and business progress and survival, as well as, the people's rights and dignity by upholding their honor and according them fair and equal treatment.

For these goals to be achieved we believe that everyone in the Company, irrespective of rank, designation, or status, to the extent possible, shall be guided by this set of principles, policies and procedures that are consistent with good morals, discipline, and professional ethics, and that this Code is adhered to and upheld at all times.

As a matter of policy, we shall strive to implement this Code with a fair and just treatment, as well as, respect to all employees to ensure that the desired conduct is always observed and thus, assured of a congenial work environment, efficient operations and harmonious relations. Likewise, due process shall be always observed.

Therefore, our conduct and adherence to our behavioral standards, rules, policies and procedures, regardless of position or status shall be guided in a manner herein provided.

DEFINITION OF TERMS

1. **Employee** refers to any person employed by the Company in any capacity and irrespective of the employment status.
2. **Superior** could be the immediate superior/manager or the head of the division, department or section where an employee belongs. For purposes of this procedure, the term Superior shall include those holding the post on an "acting" capacity
3. **Day** means a working day, or when the Company is not officially closed for business.
4. **Company's Expectations** refer to standards of general behavior and/or conduct. These are standards of professional behavior that would be generally expected of the employees, including satisfactory performance of duties.
5. **Violation or Offense** is a deviation from a Company policy, requirements, procedures, or established standards that jeopardize either the business or individuals.
6. **Discipline** is referred to the due respect, obedience and recognition of created authority as long as it is in accordance with Company policies and procedures.
7. **Disciplinary Action** is the corrective measure meted out to an employee aimed at bringing out a fuller comprehension of and conformity with the Company rules and regulations, policies and procedures and/or established authority. For instance, verbal reminder, written reprimand, suspension, and termination.
8. **Prescription Period** is the span of time necessary to lapse so as to consider past offenses or violations null and void. Simply put, this means the removal of certain or all infractions from active status of an employee's record of violations.

9. **Verbal Warning** is a discussion between the employee and his superior and/or an authorized representative of the Company regarding the employee's unsatisfactory and unacceptable behavior and/or performance. Steps to improve or change such behavior and/or performance and its possible consequences in the event no improvement is done must also be outlined in this meeting.
10. **Written Reprimand** is a letter issued to an employee by his superior informing him of the unsatisfactory and/or unacceptable behavior or performance resulting from his repetition of an offense in which a verbal warning was previously given, or commission of a more serious offense which requires stronger disciplinary action than a verbal warning and reprimand indicating that a repetition of the same or other offenses in the future shall warrant him more stringent penalty.
11. **Preventive Suspension** is a temporary lay-off WITHOUT PAY of not more than thirty (30) days, imposed during the investigation of a serious infraction for which continued presence of the concerned employee may pose grave threat to the life and/or property of the employer and/or its employees.
12. **Disciplinary Suspension** is a temporary lay-off or absence from work WITHOUT PAY by an erring employee, intended to impress upon him the seriousness or gravity of the offense committed after having him found guilty of the violation or offense lodged against him.
13. **Demotion** means reverting back to a position related in functions to that of the current position but at a lower level, or to a previous lower level position, or any position deemed fit and approved by the General Manager. This is a form of disciplinary measure as warranted by unacceptable or unsatisfactory behavior and/or performance.
14. **Termination** means permanent dismissal from the company's employ, where the employee loses the benefit of receiving separation package from the Company as sanction for committing a serious or grave offense.
15. **Show-Cause Notice** is not equivalent to written warning. This is the letter served to the employee indicating policies or rules deemed violated and asking the employee to explain in writing his side of the issue. The employee's response to the Show-Cause Notice will be the basis in determining appropriate next steps in addressing the disciplinary issue at hand.
16. **Disciplinary Action Notice** is a written notice served to an erring employee stating the results of the investigation and the sanction to be imposed.
17. **Disciplinary Hearing Panel** is a panel created to investigate the conduct and/or performance of an erring employee, only when the Company offense or violation merits termination as a penalty.
18. **Appeal** refers to a motion initiated by an erring employee to his immediate superior or the head of the section, department or division, which is done in writing and submitted within the allowable period by which an appeal could be entertained.

IMPLEMENTING GUIDELINES

A. General Guidelines

The following guidelines shall be observed in the implementation of the Company's Code of Good Corporate Conduct:

1. Company infractions of any of the Code of Good Corporate Conduct shall warrant disciplinary actions – verbal warning, written reprimand, suspension or termination from employment - depending on the seriousness or gravity of the offense.
2. Due process must be observed at all times. Disciplinary action should only be taken after the employee has had an opportunity to give his side of the issue in writing as well as in an administrative hearing; and after due consideration has been given to all relevant matters.
3. The HR Manager or Personnel Officer may on his own or upon the advice of the Legal Counsel or President, place the employee concerned under preventive suspension pending the result of the investigation if his continued presence may pose grave threat to the life and/or property of the employer and/or employees.
4. The Company may impose a lighter or heavier penalty than that provided for in this Code depending on the circumstances of each case, as well as, the seriousness and gravity of the offense committed.
5. All disciplinary actions imposed including verbal warnings, must be prepared in writing. Copies of which should be submitted to the HR department for the employee's personal file.
6. In the event that offenses incurred by an employee involved cost implications to the Company, such as payment for losses due to negligence, damages on Company property or belongings either in cash or in kind, or similar incidents, the employee shall be compelled to shoulder the cost, which may be in partial or in full depending upon recommendation by the Management or as indicated in the Corporate Finance or HR Policies, that is over and above the disciplinary action to be imposed upon the employee.

B. Multiple-Violations -

- When a single act constitutes 2 or more offenses under this Code, or when an infraction is necessary means for committing the other, the sanction for the more serious infraction shall be imposed.
- If an employee has previously violated at least 2 separate rules in this Code at the time of commission of the latest offense, all of which were committed within the 12-month period, the latest offense shall be sanctioned by the next higher step or degree of the disciplinary action prescribed for the said offense. The same principle holds true on the subsequent offenses.

C. **Classification of Company Offenses** - the Code has provided herein 3 major classifications of infractions, as follows:

- Minor Offense - any act of commission or omission which is not considered as a serious stern or harsh offense but nonetheless constitutes work disturbance or disruption or affects work performance and efficiency.
- Serious Offense - any act of commission or omission which seriously or badly affects the work performance and/or business operations, with or without intentional disregard to Company's standards, practices, rules, policies, and procedures.
- Grave Offense - any act of commission or omission which is considerably under pretense of a significant or likelihood threat or danger to the Company, as well as, its employees' reputation, welfare, safety, property, security, and overall interest. Hence, commission of a grave offense automatically warrants **termination from employment** in accordance with labor law guidelines. Where an employee has committed a criminal act over and above the offenses provided in this Code, the Company, through its authorized representatives, and/or its employees, may have the prerogative of pursuing a legal action over and above the disciplinary actions already meted out to the employee.

D. Right of Appeal - disciplinary sanctions meted out to an employee may be appealed through the following procedure provided however that such appeal is submitted within five (5) working days from the date the employee received his Written Notice of Decision.

E. Filing of Complaints or Violations - a complaint or violation may still be considered valid and therefore, subject to investigation and issuance of a disciplinary action, if it was filed within the prescribed period, as follows:

- Minor and Serious Offense - no more than six (6) months from date of infraction or date when infraction was discovered.
- Grave Offense - no validity period.

F. Documentation

- Assuming disciplinary issues are resolved, documentation of verbal warnings, as well as, written warnings will not be removed from the employee's personal file following the guidelines on prescription period as provided in this Code.
- Letters of suspension, demotion and termination will be retained permanently on the employee's personal file for record-keeping and future reference.

G. Interpretation of the Code - In the event that anyone may not completely understand or is confused with any of the provisions of the Code, he may always refer the matter to his immediate superior or Department Head. If either of the latter is still not clear with the issues raised by an employee, they may bring the matter to the attention of the HR Manager or Personnel Officer for clarification.

H. Offenses not listed in the Code of Good Corporate Conduct - in as much as the Company strives to provide its employees with a complete and specific Code, to the extent possible, it may not be able to predict every single and specific situation as the Code was not intended to anticipate all violations. Therefore, any act, conduct or behavior not listed under this Code but which is considered prejudicial to the interests, safety, welfare, property, and security of both the Company and its employees, shall likewise be subject to appropriate disciplinary

measures after all facts and circumstances relative to the offense have been investigated and evaluated or by way of analogy to the offenses listed in this code. The sanctions to be imposed would depend upon the gravity and seriousness of the offense.

I. Types of Disciplinary Actions

1. **Verbal Warning** - sanctions for "light" offenses; involves discussion between employee and the superior concerning minor work problems.

Examples such as, but not limited to:

- Tardiness, both in reporting for work and in submitting reports and/or other requirements;
- Absence of one day, without official leave
- Smoking in prohibited areas.

2. **Written Reprimand** - sanction for more serious offenses; or prepared upon repetition of an offense for which a verbal warning was previously given.

Examples such as, but not limited to:

- Excessive tardiness
- Absence of more than one day, without official leave
- Engaging a co-employee in a fight within Company premises, but which does not result to injury or damage to property
- Leaving work assignment without permission

3. **Disciplinary Suspension** - designed to sanction offenses that result to actual, imminent or possible damages, losses, or as a more serious action for habitual violation of policies despite previous warnings.

A **Preventive Suspension** is not a penalty, but a temporary lay-off **without pay** of not more than thirty (30) days, imposed during the investigation of a serious infraction of Company rules and policies for which continued presence of the concerned employee poses grave threat to the life and/or property of the employer and/or employees.

Examples such as, but not limited to:

- Deliberate destruction of Company property
- Fighting within Company premises that resulted to injuries or damage to property
- Insulting, intimidating, threatening superior or any official of the Company

4. **Termination** - sanction for grave offenses that result to damages, injuries, losses, breach of trust and confidence, or as a more serious sanction for repeating a previously committed violation.

Examples such as, but not limited to:

- Defiance of a reasonable and lawful order given by superior and or any official of the Company, e.g. refusal to be transferred to another territory even with sufficient notice
- Malversation or misappropriating Company funds
- Tampering with pertinent papers or documents
- Padding invoices or official receipts

Verbal warning, written reprimand and suspension are designed to give the employee the opportunity to correct his behavior. On the other hand, Termination is warranted when an employee is found guilty of committing a serious and/or grave offense and continued employment will jeopardize the interest of the Company, making it impossible to continue the employer-employee relationship.

J. Progression of Sanctions

1. Some offenses may appear light, but when committed repeatedly, may eventually lead to termination of employment.
2. There is no set number of times a violation must be committed before the disciplinary action progresses to a more severe penalty. A step may be skipped at any time as necessary.
3. Each time an offense is committed except when it merits only verbal or written warning; a panel will be formed to determine the gravity and seriousness of the offense. The panel will be composed of representatives who do not have any personal interest in the merits or outcome of the case at hand.
4. At each step, the employee will be advised of the consequences should he continue or repeat the offense.

Example: Failure to submit required reports on time

- Verbal warning on first occasion
- Written warning on second occasion
- Final written warning on third occasion
- Suspension if act is still not corrected
- If repeated after Suspension, employee will be terminated.

Note: Offense has grown from a simple case of non-submission of reports to gross and habitual neglect by the employee of his duties. The offense could also be considered a case of insubordination, or the willful refusal to follow reasonable demands or instructions given by superior.

5. The top management may impose a heavier penalty than the penalty listed in the Schedule of Offenses depending on gravity. In the same manner, the top management may also impose a lighter penalty as may be fitting on a case-to-case basis.

L. Elements of Due Process

1. Written Notice of Alleged Violation

The employee should be made aware of the alleged violation committed, regardless of the lightness or gravity, through the issuance of a Show-Cause Notice, which employee must receive.

Alleged specific policy or rules violated should be indicated in the notice, as well.

2. Opportunity to Be Heard

Accusation cannot take the place of proof. Therefore, the employee must be accorded the opportunity to present his side of the issue either through:

- Written explanation expressing his defense
- Formal investigation (especially if the offense is grave and/or serious in nature)

3. Written Notice of Decision

The written Notice of Decision should specify the Four Ps involved:

- Patakaran (Rules, norms, policies, standards)
- Paglabag (Violation, offense committed)
- Pinsala (loss, damage to the Company, property or individuals), including possible or potential damage/injury to Company, property or individuals
- Parusa (Sanction or disciplinary action)

Whatever the sanction is, the employee will be given a written notice (Disciplinary Action Notice)

M. GROUNDS FOR JUST CAUSES FOR TERMINATION (under Article 297 of the Phil. Labor Code)

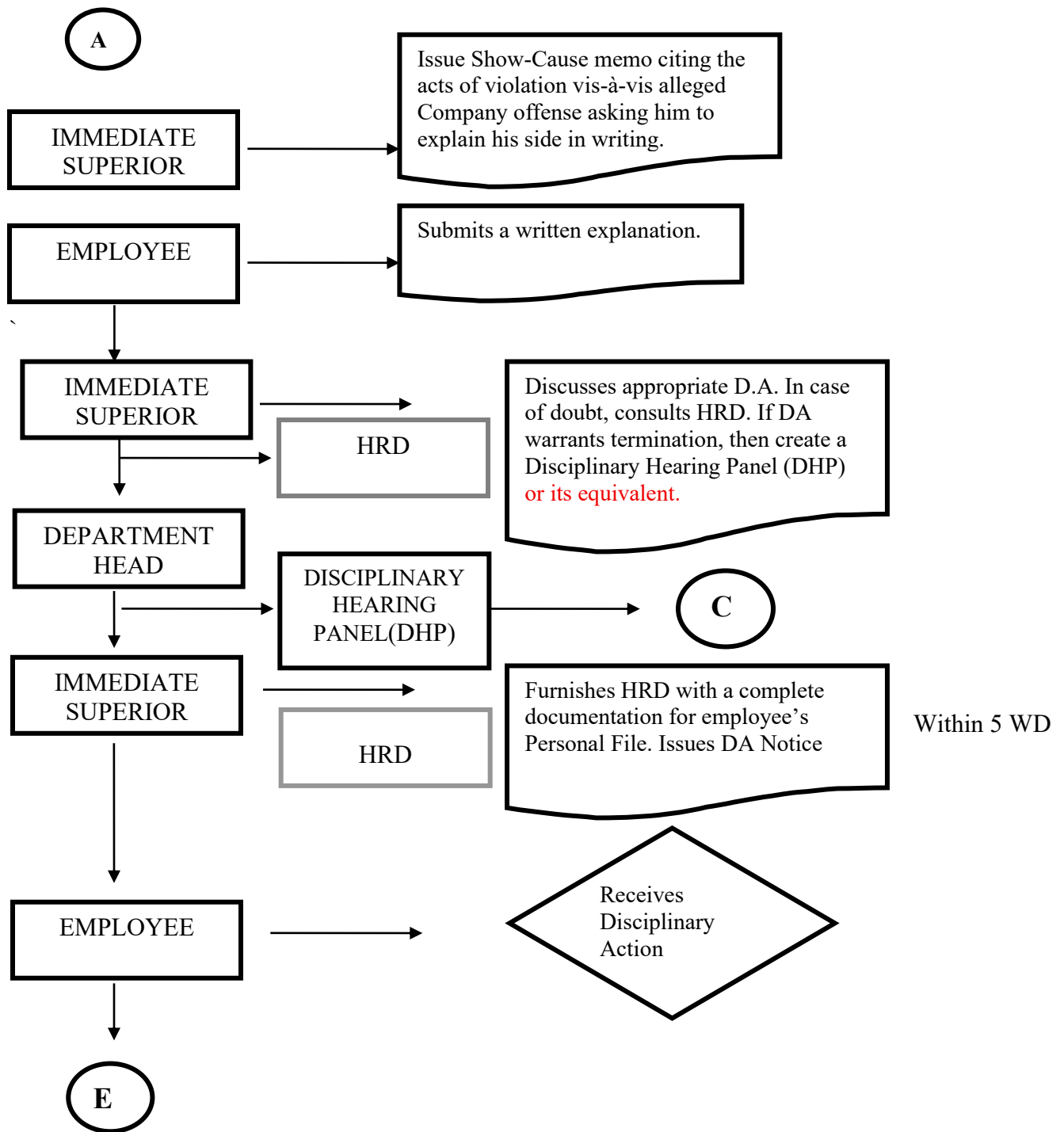
1. Serious misconduct or willful disobedience by the employee of the lawful orders of his employer or its representative in connection with his work.
2. Gross and habitual neglect by the employee of his duties.
3. Fraud or willful breach by the employee of the trust reposed in him by his superior or its 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 representative.
5. Other causes analogous to the foregoing.

PROCEDURES

A. On Show-Cause and Disciplinary Action involving Direct Subordinates

1. The immediate superior issues a Show-Cause memo, which cites the particular acts of violation committed or omitted by the employee vis-à-vis the alleged Company offense and requesting him to explain his side in writing.
2. Then the immediate superior may or may not hold a conference with the employee.
3. The immediate superior shall also explain to the employee the company's stand on the issue, actions taken or done, the effects or results of such action, what action should have been taken or done, what courses of action to take, and how it will be dealt with should the unsatisfactory conduct/performance persist.
4. Afterwards, the immediate superior shall discuss the matter with the Division Head to arrive at the appropriate disciplinary action. In case of any doubt, as well as, to ensure fairness and consistency in the application of disciplinary sanction, the superior should consult with HRD. This may require a review of past similar cases and the sanction given.
5. If the disciplinary action warrants suspension, it should always be with the prior knowledge of the HR Manager or Personnel Officer.
6. The immediate superior shall furnish HRD with a complete documentation for the employee's personal file.

(Please refer to Figure 1 for the Process Flow Diagram)

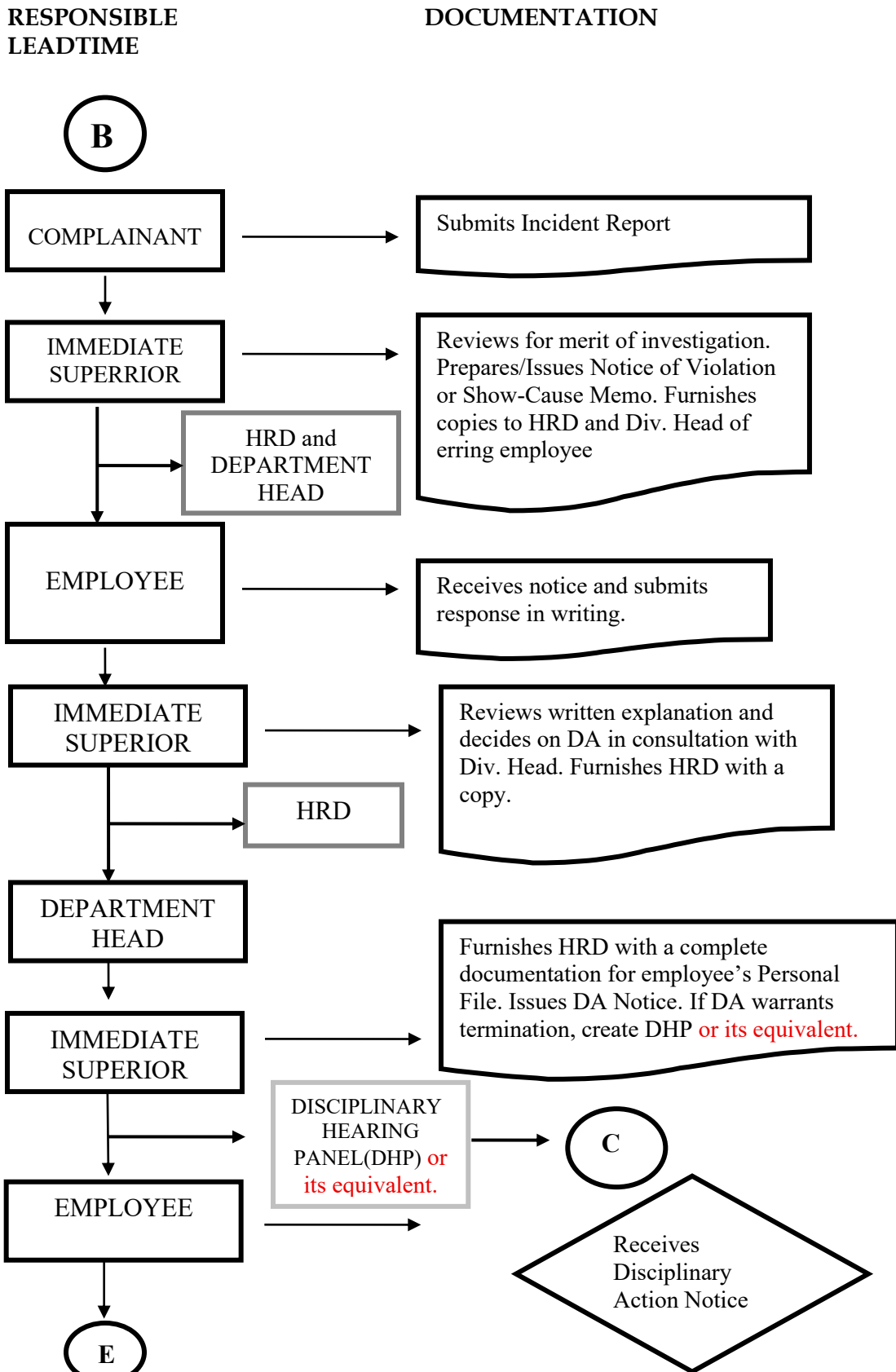


B. On Show-Cause and Disciplinary Action involving Employees of other Divisions

1. An employee, supervisor or manager may initiate a written complaint (also known as “incident report”) against another employee of the Company, its customers/client or any other external party and vice versa. The written complaint must be duly signed by the complainant and if necessary, must be noted by his immediate superior or Department Head in order for such complaint to be given merit for investigation.
2. Upon submission, the employee-complainant shall likewise furnish the HRD with such written complaint or incident report for proper information, monitoring and documentation.
3. The immediate superior or Department Head of the employee-complainant shall then prepare and issue a notice of violation (Show-Cause memo) to the employee alleged to have committed or omitted an act of violation, which indicates the particular acts that constitute grounds for disciplinary action. HRD and the immediate superior or Department Head of the erring employee should also be furnished a copy of the Show-Cause memo.
4. In turn, the erring employee is given at least seventy-two (72) hours or three (3) working days from receipt of the notice or Show-Cause memo to explain in writing why no sanction or disciplinary action should be warranted against him. A shorter period may be given provided however it should not be less than twenty-four (24) hours as stipulated in the Labor Code.
5. Upon receipt of the response memo from the erring employee, the immediate superior or Department Head of the employee-complainant should furnish a copy to HRD.
6. In the event that an erring employee refuses to acknowledge receipt of the Show-cause notice, giving a copy of the notice, which indicates his refusal to receive said notice when served, already satisfies the obligation of the immediate superior or Division Head. Nevertheless, a copy of the show-cause notice with all the notes pertaining to employee’s refusal to receive must be sent by registered mail to the residence of said erring employee.
7. All concerned parties review the merits of the case and shall come up with a decision.
8. If the disciplinary action warrants suspension, it should always be with the prior knowledge of the HR Manager or Personnel Officer and pass through a Disciplinary Hearing Panel.
9. As soon as due process has been observed and unless the corresponding sanction is less than termination, the immediate superior with the knowledge and approval of the Department Head, will serve the written notice of decision or the Disciplinary Action to the erring employee.
10. The immediate superior shall furnish HRD with a complete documentation for the employee’s personal file.

(Please refer to figure 2 for the Process Flow Diagram)

Figure 2. Flow Diagram for Show-Cause and Disciplinary Action concerning employees of other Divisions

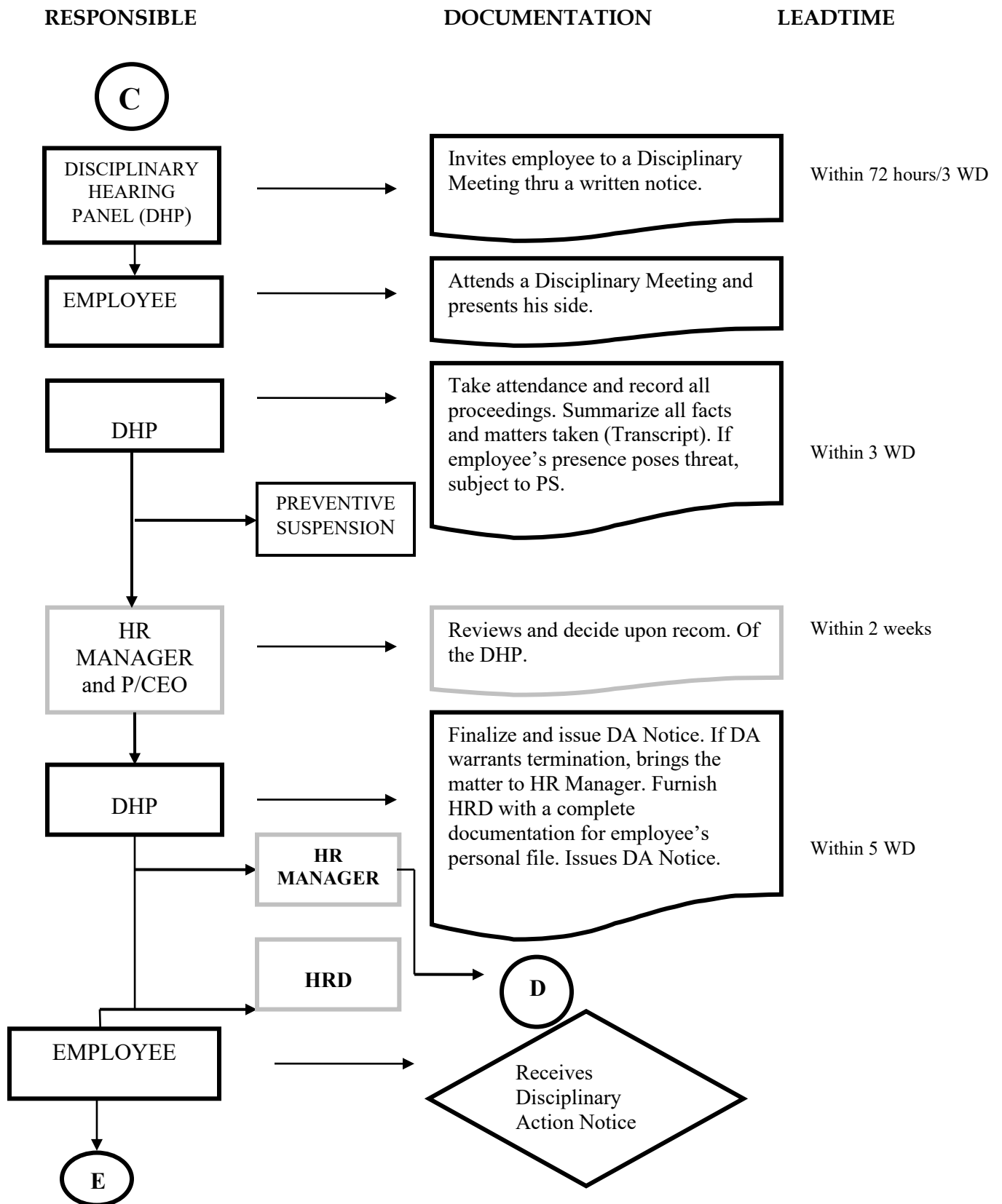


C. On Disciplinary Meeting/Administrative Hearing

1. A Disciplinary Hearing Panel, or its equivalent, may be created if and only when a Company offense or violation is very serious or merits termination as a disciplinary action.
2. An erring employee shall be afforded with a fair and equal opportunity relative to the complaints lodged against him.
3. The Disciplinary Hearing Panel shall invite the employee to attend a disciplinary meeting/administrative hearing in order that he would have full participation in the course of the investigation, thereby giving him the opportunity to be heard. The employee shall be notified in writing at least seventy-two (72) hours prior to the conduct of the disciplinary meeting/administrative hearing.
4. Before the investigation proper, attendance shall be taken, which requires all participants to signify their presence. All proceedings shall be recorded for reference and evaluation.
5. If the alleged offense is perceived to be serious and grave, which may pose a threat to the life or property of the Company or its employees, the employee, upon approval of the HR Manager or Personnel Officer, may be put under preventive suspension pending a full disciplinary hearing for which he shall receive at least seventy-two (72) hours notice.
6. At the end of the investigative proceedings, all facts and matters taken will be summarized and all parties present will have to sign to attest and confirm all statements made and the same shall be part of the official documentation (Transcript of Administrative Meeting).
7. After having heard and considered the merits of the case, the Panel will draft its decision and present the same to the HR Manager or Personnel Officer and the P/CEO for final approval.
8. The P/CEO should review and decide upon the report/recommendation of the Panel within two (2) weeks.
9. As soon as the entire course of the investigation is completed, the employee shall be advised in writing of the results and the corresponding sanction (known as Disciplinary Action Notice) to be carried out no later than five (5) working days from the time the decision was made. The disciplinary Action Notice should include an advice to the erring employee of his right to appeal.
10. All members of the Disciplinary Hearing Panel shall sign the Disciplinary Action Notice and serve the same to the employee. If the disciplinary action calls for termination of employment, a Termination Notice will be issued to the employee, which must be signed by the HR Manager and the Department Head.
11. The Disciplinary Hearing Panel shall submit a complete set of the documents to HRD for purposes of record-keeping and future reference and for employee's personal file.

(Please refer to Figure 3 for the Process Flow Diagram)

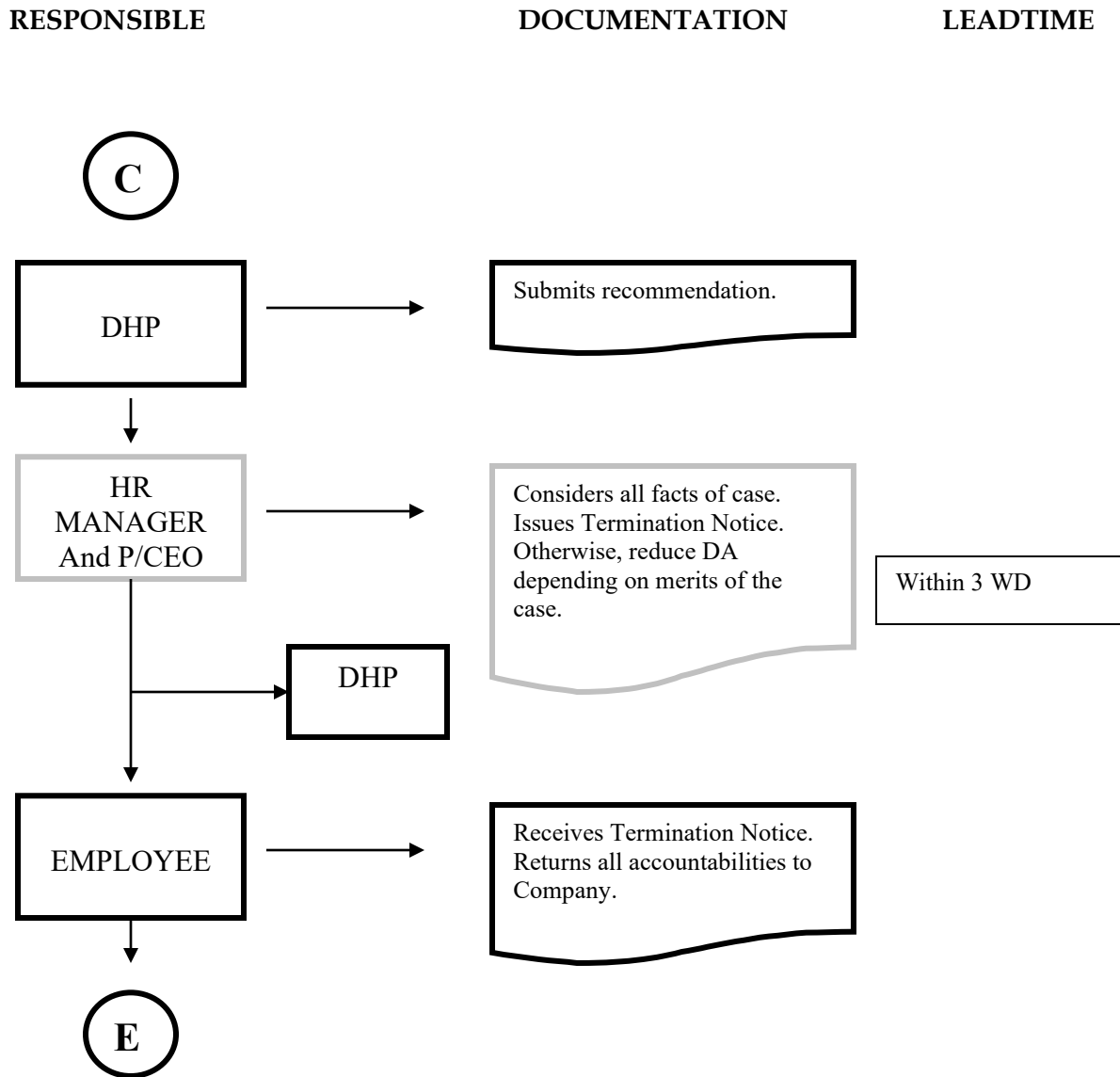
Figure 3. Flow Diagram for Disciplinary Hearing/Investigation



D. On Termination

1. It must be made known that termination of employment services shall only be carried out upon due consideration of all facts and circumstances gathered and presented.
2. After going through the investigation process with the DHP and termination as a disciplinary action has been decided upon, the employee will be advised in writing (Termination Notice) not later than three (3) working days from the time of the decision.
3. Upon receipt of the Termination Notice, the employee must account for and immediately return all Company properties assigned or entrusted to him by his immediate superior.
4. In case the employee did not appear to receive his Termination Notice, said notice shall be sent via registered mail to his last known address and this completes the obligation of the Company.

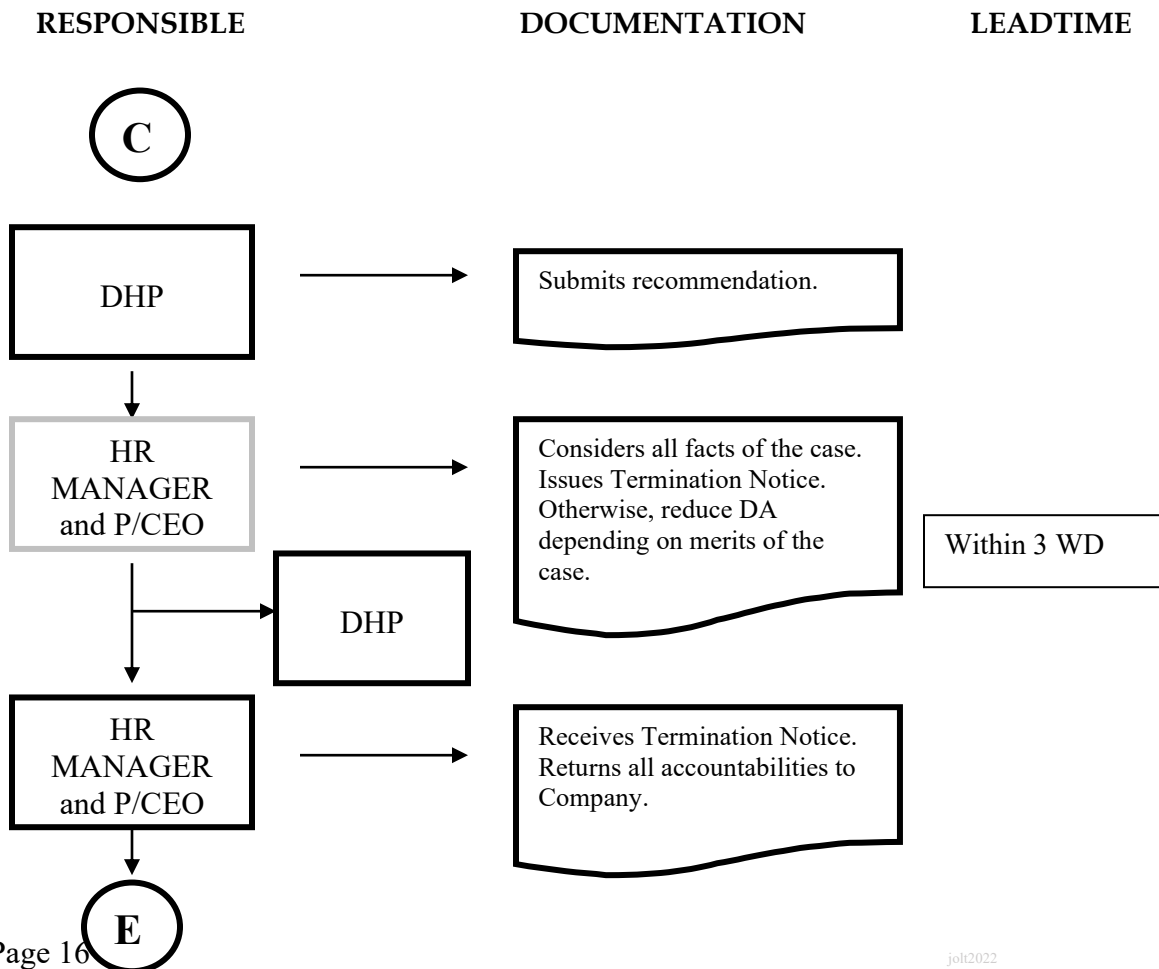
Figure 4. Flow Diagram for Termination



E. On Appeals

1. Appeals against any disciplinary action should be filed in writing within three (3) days upon issuance of the Disciplinary Action Notice/Termination Notice to the employee.
2. Once an appeal has been filed, it will be management’s prerogative to give due recognition to the appeal.
3. The written appeal should be submitted to the General Manager and should indicate the reasons and clear grounds for the appeal.
4. An APPEALS COMMITTEE will then convene, composed of the P/CEO or his delegate, HR Manager or Personnel Officer, and another management representative, within ten (10) days from receipt of the appeal (including review of relevant documentation/facts of the case).
5. Prior to the Appeals Committee meeting, all relevant documentation will be gathered and made available to the members of the Appeals Committee for review and evaluation.
6. The appeals Committee will be given five (5) days to review the facts of the case. After the five-day review period, the Appeals committee Meeting shall be conducted with prior notice to the appellant of not less than seventy-two (72) hours.
7. The Appeals Committee’s decision should be made within five (5) days from date of the Appeals Meeting/Hearing.
8. The Appeals Committee’s decision shall be final and executory. The Appeals Committee shall notify the appellant of the final decision of the committee in writing. There will be no further right of appeal for the employee within the Company.

Figure 5. Flow Diagram for Appeals



SCHEDULE OF DISCIPLINARY ACTIONS:

The following schedule of Disciplinary Actions has been enumerated in order of degree, which shall be imposed in the event of any violations on the Code of Good Conduct:

<u>Disciplinary Action</u>	<u>Number of Infraction</u>
Verbal Warning	1 st Offense
Written Reprimand	2 nd Offense
One-day Suspension	3 rd Offense
Three-day Suspension	4 th Offense
Five-day Suspension	5 th Offense
One month Suspension	6 th Offense
Termination	7 th Offense

Note: All suspension refers to working days (regular holidays, special days and/or rest days are not considered part of the suspension days)

The corresponding penalty to be imposed on an employee after being proven accountable for an offense is primarily determined by the specific nature of his misconduct or misdemeanor vis-à-vis the number of times he has violated such particular provision in the Code of Good Corporate Conduct. Each offense in this Code has a separate table of sanctions on where prescription of the corresponding disciplinary action is based.

For example:

	No. of Offenses and their Corresponding Sanctions						
OFFENSES AGAINST ABSENCES AND TARDINESS	1st	2nd	3 rd	4th	5th	6th	7th
1) Unauthorized or unexcused absence from work (failure to report for work without valid or justifiable reason) or simple case of absence.	VR	WR	1DS	3DS	5DS	1MS	T
2) Habitual Absenteeism or excessive absences of at least 3 days in a month, unless it is covered by a pre-approved leave application; or absences without official leave (AWOL).	WR	3DS	5DS	T			

Ideally, the principle of progressive discipline shall be applied. However, there are instances when this shall not be appropriate and applicable, especially in the case of multiple-violations or accumulated offenses due to violation of different provisions in this Code.

A violation or offense of the same provision done repetitively or a series of irregularities, even of different nature, over a given period of time is said to be habitual.

As such, this provides the Company with a reasonable ground for implementing more stringent disciplinary actions including terminating an employee for accumulating a significant number of offenses within a given period from the time of the first disciplinary action, are considered a

reasonable ground for an employee's termination of employment. In which case, we refer to the table hereunder.

Classification and Number of offenses committed	Period within which an Employee committed an Offense		
	Within 3 Months	Within 6 Months	Within 12 Months
	7 minor Offenses	10 minor Offenses	15 minor Offenses
	3 Serious Offense	7 Serious Offense	9 Serious Offense
	5 Minor and 1 Serious	7 Minor and 3 Serious	10 Minor and 3 Serious
	2 Serious and 1 Minor	5 Serious and 2 Minor	7 Serious and 3 Minor
	Any number or combination of offenses more than those listed above	Any number or combination of offenses more than those listed above	Any number or combination of offenses more than those listed above

SCHEDULE OF OFFENSES

Below is the schedule of offenses and its corresponding disciplinary actions, which are inconsistent with the Company’s rules and regulations under the Code of Business Conduct and Corporate Policies, as well as, in conflict with acceptable organizational norms and practices.

VIOLATIONS	No. of Offenses and their Corresponding Sanctions							
	Art.	1st	2nd	3rd	4th	5th	6th	7th
<p>Article I. GROSS MISCONDUCT</p> <p>We, as group of professionals are God-centered, value excellence, teamwork, integrity, customer service, and employee satisfaction. We want to treat each other with dignity and respect, and be morally upright. We strongly feel that our behavior must reflect our values.</p>								
<p>Section 1. Acts of Immorality, Indecency or Disrespect to One’s Dignity</p>	A							
<p>1> Committing acts of indecency, immorality and moral turpitude within or outside company premises or during official business prejudicial to the Company’s interests. (Grave Offense)</p>		T						
<p>2> Acts of lasciviousness committed and performed by an employee upon employees of either sex. (Grave Offense)</p>		T						
<p>3> Exhibition or distribution of pornographic literature, publicly propagating doctrines contrary to public morals and standards to the prejudice of the Company’s integrity and interest. (Grave Offense)</p>		T						
<p>4> Engaging in illicit or unlawful affairs with a co-employee(s) or with a person not necessarily employed by the Company, that affects work productivity and cause the Company disgrace and puts the Company’s name in a bad light. (Grave Offense)</p>		T						

5> Sexual Harassment committed by any or any other person, who having the authority, influence or moral ascendancy over another within or outside the Company premises, demands, requests or otherwise requires any sexual favor from the other, regardless of whether the demand, request for requirement for submission is accepted by the object of said act, or any violation of RA No. 7877 (Anti-sexual harassment Act of 1995), or violation of RA No. 11313 (Safe Space Act) as well as, that which are defined and specified under the Corporate Code of Business Conduct. (Grave Offense)		T						
5.1> Performs or exhibits unwelcome sexual advances. (Grave Offense)		T						
5.2> Requests for sexual favors or other verbal or physical conduct of a sexual nature in the work environment. (Grave Offense)		T						
5.3> Verbal harassment or unwelcome offensive, lewd or sexually-oriented jokes, e-mails, advances, propositions, overt threats, conversations with sexual overtones, etc. whether written or spoken. (Grave Offense)		1MS	T					
5.4> Physical harassment or unwelcome body contact through touching, etc. (Grave Offense)		T						
5.5> Harassment thru virtual technology or modern means or unwelcome exposure to sexually explicit gestures, pictures or objects (e.g. calendars, posters, Internet images, magazines, graffiti). (Grave Offense)		T						
5.6> Any and all acts of sexual harassment. (Grave Offense)		T						
6> Work Harassment, such as engaging in epithets, slurs, negative stereotyping, or threatening, intimidating or hostile acts, or written or graphic material that denigrates or shows hostility or aversion to an individual because of age, religion,		5DS	1MS	T				

race, gender, sexual orientation, position, rank or designation, etc. and that is placed on walls, bulletin boards, in electronic media, or anywhere in the work environment or is circulated in the work environment. (Grave Offense)								
7> Any and all acts that are offensive to decency and good moral, which give rise to public scandal to the Company, its employees or visitors. (Grave Offense)		T						
Section 2. Fighting, Troublemaking, Threats, Coercion or Physical Injury	A/ D							
1> During working time or within Company premises, or during any Company-sponsored similar activities, engaging another employee or other employees or persons in a fight, or prodding or goading another employee or employees or other persons to engage in a fight, which:								
1.1> Results in injury to persons or destruction/damage to property. (Serious Offense)		5DS to 15DS depending on gravity	1MS	T				
1.2> Does not result in injury or damage to Company or any of its property. (Minor Offense)		3DS	5DS	1MS	T			
2> Assaulting, challenging to a fight, intimidating, coercing or threatening with bodily harm or intentionally causing physical or bodily injury to another person during working time and/or within company premises. (Serious Offense)		1MS or T depending on gravity	T					
3> Taking of human life. (Grave Offense)		T						
4> A violent act which prevents an employee or officer of the Company from performing his official functions. (Serious Offense)		1MS	T					
5> Act of intimidation or coercion, which forces an employee or other person in the Company to engage into or do something against his will. (Serious Offense)		1MS	T					
6> Use of Harsh Words, Threats, Vexations, Insults, or Intimidation. For example, "You're stupid", "You're an idiot", "I will terminate you!" (Serious Offense)		3DS	5DS	1MS	T			

7> Insulting, threatening, using abusive or profane language, or showing willful disrespect to anyone in the Company or any immediate member of his family. (Serious Offense)		1MS	T					
8> Engaging in horseplay, or other similar activities within the Company premises and during working hours. (Minor Offense)		1DS	3DS	5DS	1MS	T		
9> Deliberate destruction of the Company's image/reputation, any of its property, employees or employees' immediate family members. (Serious Offense)		1MS	T					
10> Retaliation against a person for reporting a violation of the Code or any of the Company's policies. (Serious Offense)		5DS	1MS	T				
Section 3. Intriguing Against Honor, Libel, Defamation or Slander	A							
1> Rumor-mongering, intriguing or uttering malicious or false/malevolent reports against another employee or person in the Company, which tends to cast dishonor, discredit or contempt upon the latter. (Serious Offense)		3DS	5DS	1MS	T			
2> Planting evidence against another employee for the purpose of pinning him to a crime or commission of an offense under this Code and/or SPLPI's Code of Good Conduct; or to evade responsibility for his own commission of the said crime or offense. (Serious Offense)		T						
3> Commission of an act, which is done to malign, cast dishonor or discredit to the Company or any of its employees. (Serious Offense)		3DS	5DS	1MS	T			
4> Showing disrespect, discourtesy, or insult to the Company, his superior and/or co-employees. (Minor Offense)		5DS	1MS	T				
Section 4. Quarreling with Customers or Suppliers (includes canteen personnel, security guards and janitors)	A/D							
1> Assaulting, challenging to a fight, or threatening with bodily harm a customer or supplier regardless of whether or not the act resulted to		5DS	1MS	T				

injury or destruction/damage to property. (Serious Offense)								
2> using insulting, abusive, threatening or profane language against a customer or supplier. (Serious Offense)		5DS	1MS	T				
3> Showing disrespect, discourtesy, or insult to customers or suppliers. (Serious Offense)		3DS	5DS	1MS	T			
Section 5. Engaging in Non-Work Related Activities within Company Premises and during Working Hours, which may or may not result to violent behavior.	A							
1> Gambling, betting, conducting lotteries or participating in any form of games of chance, or other similar acts within company premises. (Serious Offense)		3DS	5DS	1MS	T			
2> Soliciting for any cause and selling/peddling of goods, wares, moon lighting, engaging in personal sideline business, etc., without prior approval from the Company. (Serious Offense)		WR	5DS	1MS to T depending on gravity	T			
3> Distributing literatures unrelated to work within Company premises at all times, and outside Company premises during working time, without Company approval. (Minor Offense)		WR	1DS	3DS	5DS	1MS	T	
4> Writing, carving, etching, painting or posting writings, drawings or other similar acts which tend to deface Company property. (Minor Offense)		IDS	3DS	5DS	1MS	T		
5> Drinking alcoholic beverages or taking prohibited drugs within Company premises either during or after official work hours. (Grave Offense)		T						
6> Reporting to work under the influence of alcohol or prohibited drugs. (Grave Offense)		T						
7> Bringing in, possessing, using or causing to be brought or used, prohibited drugs into Company premises, except when such drugs take the form of medicine prescribed by a physician, and approval is sought from the Company for bringing such drugs inside its premises. (Grave		T						

Offense)								
8> Smoking in prohibited areas. (Minor Offense)		WR	1DS	3DS	5DS	1MS	T	
9> Connivance or knowledge of any form of gambling, betting, and/or other unauthorized activities within the company premises. (Minor Offense)		1DS	3DS	5DS	1MS	T		
10> Unauthorized possession of a deadly weapon, firearm or explosives within company premises. (Grave Offense)		T						
11> Discharging of explosives or firearms during working time or within Company premises, unless authorized. (Grave Offense)		T						
Section 6. Insubordination or Willful Disobedience	A							
1> Insubordination/Willful refusal without any valid reason, to accept and to follow reasonable and lawful orders or specific instructions given by superior. (Serious Offense)		1MS	T					
2> Defiance of an order to be transferred to another territory/place of assignment even with appropriate advance notice. (Serious Offense)		1MS	T					
3> Willfully disregarding Company policies. (Serious Offense)		1DS	3DS	5DS	1MS	T		
4> Refusal to submit reports as required by superior. (Minor Offense)		WR	1DS	3DS	5DS	1MS	T	
5> Refusal to submit to security inspection or audit, medical examination or any other required tests. (Minor Offense)		WR	1DS	5DS	1MS	T		
6> Refusal to comply with established SOP (standard operating procedures) and prevailing industry practice. (Serious Offense)		3DS	5DS	1MS	T			
7> Intentional refusal to perform one's job/assigned task, resulting to potential or actual losses/damages to Company or any of its property or injury to persons. (Serious Offense)		1MS	T					
8> Refusal or failure to render overtime work even on occasions when work demands are too high, esp. after signifying willingness to do so. (Serious Offense)		5DS	1MS	T				
9> Absence despite prior denial of request for permission to be absent		WR	1DS	3DS	5DS	1MS	T	

(unless such absence shall be for a valid reason other than that for which leave of absence was denied, and such reason could not have been communicated to the immediate superior prior to absence). (Minor Offense)								
10> Refusal to follow general and specific health and safety rules. (Minor Offense)		1DS	3DS	5DS	1MS	T		
11> Refusal to submit to reasonable inspection conducted within Company premises by authorized Company security personnel or representative. (Minor Offense)		1DS	3DS	5DS	1MS	T		
12> Willfully holding back, slowing down, hindering or limiting work output. (Serious Offense)		3DS	5DS	1MS	T			
13> Reporting to work while disease is still contagious or communicable without a Medical Certificate of "Fit To Work". (Serious Offense)		3DS	5DS	1MS	T			
14> Concealing a dreaded or contagious disease/illness. (Serious Offense)		5DS	1MS	T				
15> Intentional disregard to comply or violation of general health and safety rules and regulations. (Serious Offense)		1DS	3DS	5DS	1MS	T		
16> Willful refusal without valid reason to cooperate with other employees in the completion of assigned functions/tasks. (Minor Offense)		1DS	3DS	5DS	1MS	T		
17> Refusal to cooperate in the investigation of a violation of the Code or any of the Company's rules and regulations. (Serious Offense)		5DS	1MS	T				
18> Authorization or participation in actions or behavior that violate the Code or any of the Company's policies. (Serious Offense)		5DS	1MS	T				

Article II. GROSS NEGLIGENCE

As St. Peterians, we value excellence and professionalism in the way we perform our jobs and attend to internal and external customers.

It is therefore expected that employees perform their jobs with utmost care, efficiency and transparently -within set company standard operating procedures.

Section 1. Absences and Tardiness	B							
1> Unauthorized or unexcused absence from work (failure to report for work without valid or justified reason) or Absence Without Official Leave (AWOL), including unauthorized half-day or undertime. (Minor Offense)		WR	1DS	3DS	5DS	7DS to 1MS depending on gravity	1MS to T depending on gravity	
2> Habitual absenteeism or excessive absences, which is over and above the allowable vacation or any Company-authorized leaves, without justifiable reason. (Serious Offense)		1DS	3DS	5DS	1MS	T		
3> Deliberate and unjustified refusal of the employee to resume his employment; or abandonment of work with the intention to sever employee-employer relationship. (Grave Offense)		T						
4> Unauthorized extension of leave of absence, especially for the purpose of pursuing alternative professional or personal pursuit (e.g. applying for work abroad while on vacation), whether or not extension would result to substantial disruption of work, or would affect continuity of work. (Serious Offense)		1DS	3DS	5DS	1MS	T		
5a.> Tardiness in reporting for work. (Minor Offense)		WR	1DS	2DS	3DS to 10DS depending on gravity	12DS to 15DS depending on gravity	20DS to 1MS depending on gravity	1MS to T depending on gravity
5b.> Habitual or Excessive Tardiness in reporting to work (Serious Offense). Consistently late for at least 3 consecutive days.		WR	3DS	5DS	1MS	T		
6> Tardiness in attending meetings and other official functions without justifiable reason (i.e. 15 minutes for a 1-hour meeting; 30 minutes or more for meetings of more than 1-hour duration). (Minor Offense)		WR	1DS	3DS	5DS	10DS	15DS	1MS to T depending on gravity
7> Tardiness in submitting reports and other projects/requirements, except when extension of deadline was first sought and was subsequently granted. (Minor Offense)		WR	1DS	3DS	5DS	10DS	15DS	1MS to T depending on gravity
8> Tardiness in reporting to work after taking his break time or extending break time, either in the		WR	1DS	3DS	5DS	10DS	15DS	1MS to T depending

office or in the field, beyond prescribed official break time. (Minor Offense)								on gravity
Section 2. Negligence	B							
1> Failure to submit required reports, with no initiative to request for extension of deadline or failure to submit standard reportorial requirements within designated period. (Serious Offense)		WR	2DS	5DS	10DS to 20DS	1MS	T	
2> Acts of negligence or carelessness concerning work, committed during working time or within work premises, resulting in injury to persons or damage to property belonging to the Company or to third parties, or otherwise causing expenses to be incurred by the Company, e.g. Car accident as a result of driving while texting, or driving after drinking alcoholic beverages. (Serious Offense)		3DS	5DS	10DS to 1MS depending on gravity	1MS to T depending on gravity			
3> Repeated negligence causing the Company potential or actual losses, damages, or wastages. (Serious Offense)		5DS	10DS	15DS to 1MS depending on gravity	1MS to T depending on gravity			
4> Serious Neglect or failure to carry out verbal or written official orders, and/or perform regular assigned duties, or specific instructions related to his duty. (Serious Offense)		1MS	T					
4.1 >Delay and/or failure to deposit collections/company funds exceeding 1000 pesos in designated banks per company standard operating procedures.		5 DS	15DS	1MS to T depending on gravity				
4.2 >Delay in encoding required reports and entries and/or submission of any such reports. (Serious Offense)		WR	3DS	10DS to 15DS	1MS	T		
4.3 >Failure to maintain the St. Peter Office/facility, its premises and/or company equipment in proper condition as required by the company. (Serious Offense)		WR	3DS	5DS	10DS	15DS to 1MS depending on gravity		
4.4 >Failure to collect full payment of accounts receivable from memorial services within Company standards. (Serious Offense)		5DS	10DS to 15DS depending on gravity	1MS	T			
4.5 > Cash shortage/overage over 500 pesos but not exceeding 2000 pesos.		5DS	15DS	1MS to T depending on gravity				

(Serious Offense)								
5> Losing or misplacing Company records/documents, (e.g. 201 files, manuals, reports, etc.). (Serious Offense)		3DS	5DS	15DS	1MS to T depending on gravity			
6> Negligence of the employee in the care of Company equipment, tools or property resulting or causing damage to property or injury to persons and/or payment for losses due to negligence in handling Company funds or other similar incidents. (Serious Offense)		5DS	15DS	1MS to T depending on gravity				
7> Failure to inform HRD within 10 days from effectivity any change in personal data, such as civil status, address, and of dependents including contact numbers. (Minor Offense)		WR	1DS	3DS	5DS	10DS to 15DS depending on gravity	1MS to T depending on gravity	
8> Unauthorized performance of task(s) assigned to another employee that results in losses, damages, or wastages to the Company. (Serious Offense)		3DS	5DS	10DS	1MS	T		
9> Unauthorized use or misuse of Company property, equipments and/or facilities, such as computer, office machines, supplies, etc. (Minor Offense)		WR	1DS	3DS	5DS	1MS	T	
10> Installing or introducing unauthorized computer software to any Company computers/PC. (Serious Offense)		5DS	1MS	T				
11> Unauthorized use or misuse of electronic mail, voicemail, the Intranet, the Internet, and other electronic media for purposes and activities other than business and official use. (Serious Offense)		3DS	5DS	1MS	T			
12> Failure on the part of a superior to take the necessary steps to avert or redress or report any act or violation of Company rules and regulations with the intent to conceal or due to gross negligence. (Serious Offense)		1DS	3DS	5DS	1MS	T		
13> Conspiracy, condoning or maliciously allowing an employee to partake or commit a Company violation of the Code or any of the Company's violations. (Serious Offense)		3DS	5DS	1MS	T			
14> Failure of a resigning employee to		WR	1DS	3DS	5DS	1MS	T	

continue rendering work during the allowable prescribed period of advance written notice, unless with proper consent and approval. (Minor Offense)								
15> Negligence in the custody of Company documents, i.e. allowing others access to confidential materials belonging to the Company. (Serious Offense)		3DS	5DS	1MS	T			
16> Failure by a violator's superior(s) to detect and report a violation of the Code or any of the Company's policies, if such failure reflects inadequate supervision or lack of oversight. (Serious Offense)		3DS	5DS to 15DS depending on gravity	1MS	T			
17> Driving Company service vehicle/car without a valid driver's license or failure to renew an expired driver's license yet engaged in driving a Company service car. (Serious Offense)		5DS	15DS to 1MS depending on gravity	1MS to T depending on gravity				
<p>Article III. FRAUDULENT ACTS OR WILLFUL BREACH OF TRUST</p> <p>We hire people of great integrity and confidentiality. It always believe that people who have chosen to be with the Company has set its mind sincerely and in preserving TRUST and CONFIDENCE. It also believes that when you joined the company, you're expected to protect the Company's rights.</p> <p>We require employees to conduct themselves in a professional manner and to maintain the highest ethical business standards at all times. The business affairs of the Company and its clients are confidential, and should not be discussed with anyone, even other employees, except as may be required in the normal course of the Company's business or with prior authorization from your supervisor. Confidential information includes, without limitation, all non-public information that might be of use to competitors, or harmful to the Company or its customers, if disclosed. Such information may include information about the Company's financial condition, prospects or plans, its marketing and sales programs and research and development information, as well as information relating to mergers and acquisitions and divestitures. Confidential information also includes information concerning possible transactions with other companies or information about the Company's customers, purchase orders, sales information and prospects, suppliers or joint venture partners, which the Company is under an obligation to maintain as confidential. Company Personnel may not use confidential information for their own personal benefit or the benefit of persons or entities outside the Company including, without limitation, all media outlets.</p>								
Section 1. Misappropriation or Withholding Company Funds	C							
1> Using Company funds for personal expenses. (Grave Offense)		T						
2> Diversion or application of Company funds from which it was actually intended for, or using Company funds for activities other than that for which it is intended, without proper approval and		5DS to 10DS depending on gravity	1MS to T depending on gravity	T				

authorization. (Serious Offense)								
3> Failure to return unused cash advances, or unused portions of cash advances, within the prescribed period- and without the necessity for demand. (Serious Offense)		5DS	10DS to 1MS depending on gravity	1MS to T depending on gravity				
4> Conversion of money or goods or any other Company property entrusted upon an employee either by function or duties, to the prejudice of the Company or any of its employees or authorized representatives. (Grave Offense)		T						
Section 2. Directly or indirectly tampering any pertinent papers or documents with the purpose of defrauding the Company.	C/D							
1> Padding invoices or official receipts. (Grave Offense)		T						
2> Signing for others to signify receipt of any assistance or honorarium, in cash or in kind, without actually giving the assistance or honorarium, in order to get reimbursement or to report the same as part of liquidation of cash advances or any kind of Company fund in the employee's care. (Grave Offense)		T						
3> Punching another employee's time card, or tampering time cards. (Grave Offense)		T						
4> Knowingly giving false or misleading information in applying for employment or other personnel action/movement. (Grave Offense)		T						
5> Changing the quality or quantity of any Company equipment, materials or supplies or anything of value which are considered as belonging of the Company. (Serious Offense)		T						
Section 3. Dishonesty/Concealing Important Information from the Company	C							
1> Concealing defective work, which results in prejudice to the Company. (Serious Offense)		10DS	1MS	T				
2> Knowingly giving untruthful statements or concealing material facts in an investigation conducted by authorized representative of the Company. (Serious Offense)		10DS	1MS	T				

3> Giving false or misleading information to seek or to qualify for any preference or benefit from the Company. (Serious Offense)		10DS	1MS	T				
4> Providing classified and or confidential information to direct competitors or other external parties, either for personal gain or otherwise. (Serious Offense)		10DS to 1MS depending on gravity	T					
Section 4. Fraud/Manipulation	C/D							
1> Channeling discounts to unauthorized parties, or cheating the Company for profit. (Grave Offense)		T						
2> Charging expenses not actually incurred in relation to official business, and reporting the same as such, for purposes of drawing reimbursement. (Grave Offense)		T						
3> Forging signature of authorized Company representatives with the intent to gain or defraud. (Grave Offense)		T						
4> Falsification, alterations or imitations of Company records/documents whether or not there is personal gain or advantage. (Serious Offense)		T						
4.1> Tampering of Official Receipts, deposit slips and any other financial document not exceeding 1000 pesos. (Grave Offense)		10DS to 1MS depending on gravity	T					
4.2> Substituting and or consolidating payment(s) made by the client(s) with personal checks or any other forms of payment. (Grave Offense)		1MS	T					
5> False representation, pretending to be an authorized representative or officer of the Company, with the intent to gain or profit with prejudice to the Company. (Grave Offense)		T						
6> Pretending to be in the assigned territory or coverage area but is elsewhere attending to personal matters and/or engaging in activities other than work. (Serious Offense)		5DS	10DS to 1MS depending on gravity	1MS to T depending on gravity				
7> Commission of any and acts of fraud, dishonesty, deceit or willful breach of trust with prejudice to the Company's interest, welfare, safety or security. (Serious Offense)		T						
Section 5. Breach of Trust	C							

1> Conniving with 3 rd person(s) to defraud the Company. (Grave Offense)								
1.1> Soliciting or receiving money, gifts, share, percentage or benefits from any person/entity, personally or through the mediation of another, to perform an act prejudicial to the Company.		T						
1.2> Soliciting or receiving money, gifts, share, percentage or benefits from any person/entity, personally or through the mediation of another, as a condition for carrying out a task which is actually part of his basic responsibilities		T						
2> Without proper previous authority, releasing or divulging confidential information to unauthorized person(s). (Serious Offense)								
2.1> Revealing trade secrets.		10DS to 1MS depending on gravity	T					
2.2> Giving or discussing marketing plans/strategies or POA (Plan of Action) to others, even if they are not direct competitors.		10DS to 1MS depending on gravity	1MS	T				
2.3> Discussing confidential work information to relatives or friends.		5DS	10DS	1MS	T			
3> Any acts of robbery and/or theft of Company property or of co-employees' personal property, with or without violence and with intent to gain inside the Company premises or lockers/drawers. (Grave Offense)		T						
4> Failure to report theft or loss of Company property. (Serious Offense)		1MS	T					
5> Concealing or refusing to report violations of Company rules and policies. (Serious Offense)		3DS	5DS	1MS	T			
6> Favoring competitors. (Serious Offense)		1MS	T					
7> Unauthorized sale or disposition of Company property, equipments, etc. (Serious Offense)		T						
8> Participating whether directly or indirectly, in any activity or transaction where such involvement is		1DS	5DS	10DS	15DS to 1MS depending on gravity	T		

in conflict with the Company's interest, unless with prior approval and consent. (Minor Offense)								
9> Obtaining loans from customers, suppliers, and the like, prejudicial to the interest of the Company. (Serious Offense)		3DS	5DS	1MS	T			
Section 6. Sabotage	C/D							
1> Intentional or malicious destruction of Company property and facilities by and/or through any means whether or not resulting in grave loss or damage. (Grave Offense)		T						
2> Breaking into computer systems and/or other secured files and documents. (Grave Offense)		T						
3> Any and all other acts of sabotage. (Grave Offense)		T						

Article IV. GROSS INEFFICIENCY

We have set standards in which everyone must abide. Each one is understood to have set standards for himself but in order to perform profitably and efficiently, your own standards must be synchronized or aligned to Company's standards to attain excellence and greatness. Every position held is expected to deliver results with great confidence and accuracy.

The standards set for operation is intended to bring out the best in every one but never to force or pressure oneself. It enables the development of perseverance and progress.

Section 1. Failure to meet Company Standards	B							
1> Constant violation of performance standards, as well as, quality and productivity norms, such as, but not limited to:								
1.1> Not meeting required number of sales without valid reason; inability to deliver required quota (unit of services and peso revenue) or consistent failure to deliver expected net revenue (sales less operating costs) or constantly incurring significant costs without corresponding increase in revenue. (Serious Offense)		5DS	1MS to T depending on gravity	T				
2> Submission of inaccurate or unverified data in required reports for the purpose of misleading the intended user/s of the information. (Serious Offense)		T						

Article V. CRIMINAL ACTS

Section 1. Commission of an unlawful act, which is considered a criminal offense under the law. (Grave Offense)	D	T						
Section. 2. Commission of any and all acts resulting to damages and liabilities, which adversely affect the business operations of the Company, its reputation, etc. (Grave Offense)	D	T						

EFFECTIVITY

The updated 2025 St. Peter Life Plan Inc. Code of Good Corporate Conduct shall take effect immediately.

Approved for implementation:

Jonathan B. Vitangcol
President & CEO

Jude Orlando L. Tiongco
SVP H.R.O.D

Mariles P. Saynes
VP, HR & Administration