

CODE OF CONDUCT

2021



DISTRIBUTION

All Departments shall be given a copy of this Code for their reference and guide.

All employees are required to read and formally acknowledge that they have read, understood, and agree to comply with all the provisions of the Code of Conduct.

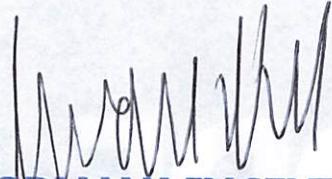
Should there be any questions or clarifications, the employee may direct them to their Immediate Supervisor and/or Department Head.

EFFECTIVITY CLAUSE

This Code of Conduct shall take effect upon approval.


22 JUL 2021
JOHN STANISLAUS L. WEE

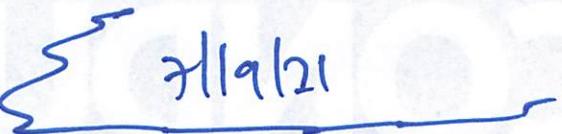
President, W Hydrocolloids, Inc.


NORMAN VINCENT L. WEE

President, W Landmark, Inc.

WINSTON LEE HIONG L. WEE

Chief Executive Officer, W Hydrocolloids, Inc.


FRANCIS AUGUSTUS L. WEE

Chief Executive Officer W Landmark, Inc.

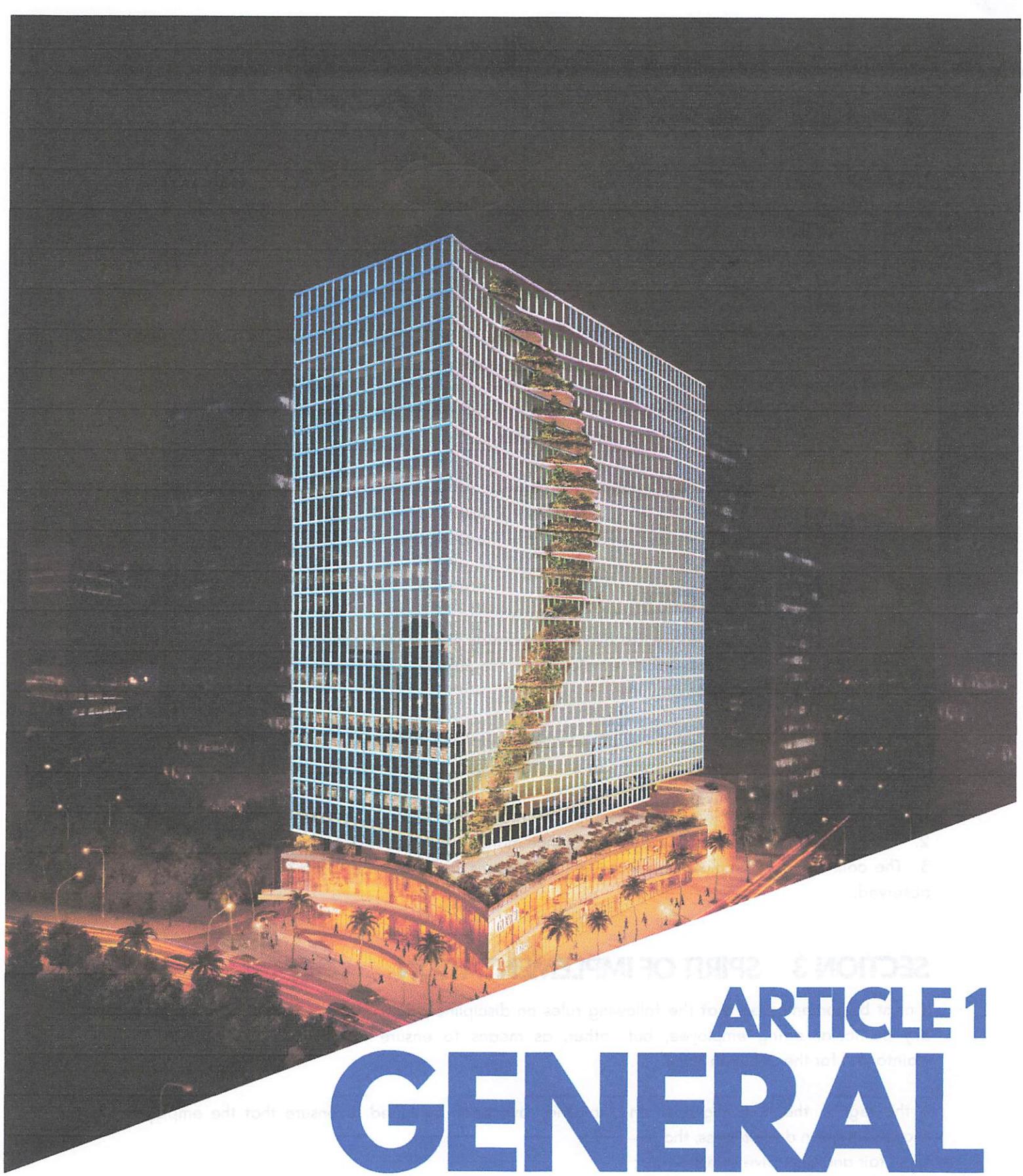
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FOREWORD

W GROUP, INC. and its subsidiaries, W Hydrocolloids, Inc. (WHI), Marine Resources Development Corp. (MRDC), Agro Commodities Inc. (ACE), W Ventures, Inc., First Marcel Tower Condominium Corporation (FMTCC), W Land Holdings, Inc. (WLHI), Goldenwill Inc., W Landmark, Inc. (WLI), Job & Careers, Inc. (JCI), Biosphere Group Holdings, Inc, W Foundation, Inc., WLH & Sons, Inc., W Securities, CGA Venture, and W Group (collectively, the "Company"), believe that every employee, owing to his inherent goodness, is capable of conducting himself uprightly at all times. The Company also believes in the employee's adherence to the good values of honesty, obedience, loyalty, industry, responsibility, and integrity.

For this purpose, the Company aims to provide a work set-up that will encourage discipline and order that will lead to greater productivity and efficiency of business operations. Thus, this Code of Conduct is hereby adopted as an effective tool to strengthen the employee's professional and personal values in the pursuit of attaining the Company's goals and objectives.



ARTICLE 1

GENERAL PRINCIPLES

Photo: W City Center at night

SECTION 1 OBJECTIVES

Discipline is a key factor in any business undertaking. It promotes greater efficiency in business operations, creates a general condition of orderliness *conducive* to greater manpower productivity, reinforces the moral fiber of all employees, and most of all, enhances the Company prestige. The purpose of disciplinary action is not to punish the employee concerned but to correct their performance or behavior. It is also to demonstrate management commitment to promote discipline among all employees regardless of status and position.

In imposing disciplinary action for violations of Company rules and regulations, the Management must ensure that the disciplinary action is proportionate to the gravity of the offense and that it is imposed in compliance with the requirements of due process. Thus, depending on the individual's record and the circumstances of the given situation, superiors may take corrective action in the form of verbal warning, written warning, suspension, or dismissal.

For the foregoing reasons, the company has seen it fit to promulgate the following rules and regulations so that all employees in the organization will be reminded to conduct themselves in a manner befitting the respective positions they hold in the Company.

SECTION 2 POLICIES

The Company believes that corrective disciplinary action should be instituted in order to eradicate the unsatisfactory performance of an employee for the sake of effective operations and to further improve the moral of fellow employees.

The Company adheres to principles of positive discipline, which means that Management will actively work to prevent the occurrence of situations where disciplinary actions may be taken. Such actions will include:

1. The communication of job standards and work regulations to all employees;
2. The consistent implementation of performance monitoring and employee feedback;
3. The counseling of employees the moment deviations from standards and work regulations are observed.

SECTION 3 SPIRIT OF IMPLEMENTATION

It must be remembered that the following rules on discipline are not intended as reprisals against any particular erring employee, but rather, as means to ensure discipline, and thus shall be maintained for the common good.

In this regard, the following rules on discipline have been designed to ensure that the employee charged is given due process, that is –

1. A fair and objective investigation;
2. An opportunity to explain himself, and;
3. Written notification of the results of the investigation and of the disciplinary action imposed and reason/s for such.

Moreover, the Company has gone to great lengths to ensure that through these rules, any investigation for the infraction or breach hereof is characterized with impartiality, open-mindedness, prudence, circumspection, and utmost fairness.

SECTION 4 TITLE AND COVERAGE

These Rules and Regulations shall be known and referred to as the "Code of Conduct" (the "Code", for brevity) and shall be applicable to all employees of the Company, irrespective of employment status, and designation.

SECTION 5 RESPONSIBILITIES

It shall be the responsibility of:

The Employee

1. To be aware of the provisions of the Code especially those which relate to the acceptable standards of behavior.
2. To work in accordance with said acceptable standards of behavior.

The Immediate Supervisor/Department Head

1. To disseminate and explain the provisions of the Code to their subordinates.
2. To implement the provisions of the Code with the objective of promoting a healthy work environment for their subordinates.
3. To ensure that the acceptable standards of behavior, as embodied in the Code, are well complied with.

The Human Resource Department

1. To assist in the dissemination and explanation of the provisions of the Code to the employees.
2. To assist in instituting the appropriate disciplinary action to erring employees, and in the overall implementation of the Code.



ARTICLE 2

OFFENSES & PENALTIES

Photo: Seaweed sorting at Mandaue Plant

SECTION 1 DEFINITION OF OFFENSE

All acts or omissions constituting to violations of the established company procedures in the transactions of its business, rules and regulations; or other acts prejudicial to the interest of the Company, are punishable offenses. These include crimes or acts involving moral turpitude, whether or not these are explicitly defined herein.

1.1 General Classification of Offenses

Offenses against rules, policies and established norms of conduct and laws may be grouped to five (5) General Classifications, namely:

1. Offenses regarding Attendance and Decorum
2. Offenses affecting Work Productivity
3. Offenses against Company Property, Equipment, Tools, and Assets
4. Offenses against Health and Safety
5. Offenses against Good Moral and Right Conduct

1.2 Degree of Seriousness of Offenses

Offenses under each General Classification of Offenses are further classified according to degree of seriousness, with corresponding description as follows:

A **Type "A" Offense** is generally committed in any of the following manners:

1. If it involves more of an infraction of a rule or procedure rather than of a moral precept;
2. If it represents more of an omission or an oversight rather than a positive act;
3. If it represents more of a mistake or an act of negligence rather than a malicious intent;
4. If it does not result in serious inconvenience either to another person or to the Company.

A **Type "B" or Type "C" Offense** is generally committed in any of the following manner:

1. If it involves a habitual disregard for the established rules of the Company;
2. If it involves either repeated violations within a relatively short time of what otherwise would be a minor offense; or
3. If the culpable commission or omission of an act results in serious embarrassment or inconvenience to another person or to the Company.

A **Type "D" Offense** is generally committed in any of the following manner:

1. If it is committed with wantonness or gross negligence;
2. If it involves what is generally regarded as substantial matter (e.g. large sums of money or confidential information);
3. If it is charged as immoral.

SECTION 2 RESPONSIBILITIES

Penalties are imposed for the purpose of establishing order and discipline within the Company.

Kinds of Penalties

A. Reprimand

A reprimand is a notice, whether verbal (oral) or written, calling the attention of the offender and warning him against repetition of such violation in the future.

2 Types of Reprimand:

1. Verbal (Oral) Warning – an oral admonition or censure given to an employee for an infraction of a rule and to warn the employee that repetition of the offense will be dealt with more severely. The verbal warning is documented via a Notice of Decision and filed in the employee's 201 file.
2. Written Warning – a written notice given to an employee for a document reminder to adhere to the acceptable standard or behavior in relation to the act or omission subject of written reprimand; provided that in case of subsequent commission of the same act or omission, a stiffer corrective action shall be taken against him.

B. Restitution

This penalty may be imposed along with any of the other penalties for cases of destruction or damage to the property of the Company, of its employees, clients, or other parties doing business with the Company as well as in cases of theft. The Company may recover the amount involved by installments or by whatever legal means that shall allow the offended to pay the amount involved. Restitution shall in no way mitigate the other penalties attached to the infraction.

C. Suspension

Suspension is the temporary cessation of an employee from service for a designated period of time without salary and benefits for the period involved. The terms and length of suspension shall be determined by the gravity of the offense committed.

If an employee who was suspended is subsequently exonerated of all charges, they shall be restored to their original position with full pay from the date of their suspension and without any adverse effect on his tenure of employment.

D. Dismissal

Dismissal is the dishonorable separation from the service of an employee for just cause under Article 282 of the Labor Code or for a violation of this Code.

SECTION 3 DISCIPLINARY ACTIONS

Offenses under each degree of seriousness have corresponding disciplinary actions and penalties, depending on the frequency of infractions committed as seen in the following article.

Past offenses shall be reviewed to determine whether the employee is a habitual offender. Thus, an employee may be dismissed if the number of past offenses warrants such penalty even if the offense considered separately may not warrant a dismissal. However, in establishing whether an employee had only occasional lapses of misbehavior or if he/she shows a pattern of incorrigibility, the length of time between offenses shall be considered.

Depending on the seriousness of the offense, the employee is given a "fresh start" or "clean slate" after the lapse of a particular period, as follows:

DISCIPLINARY SANCTION	PRESCRIPTION PERIOD
Verbal Warning	Will refresh after six (6) months
Written Warning	Will refresh after one (1) year
Suspension	Will refresh after two (2) years



ARTICLE 3

SPECIFIC OFFENSES, RULES, AND REGULATIONS

ISSUED BY THE STATE OF PENNSYLVANIA

Photo: W Fifth Avenue Lobby

Number of Offense	Type A	Type B	Type C	Type D
1st Offense	Written	1 day Suspension	5 days Suspension	10 days Suspension
2nd Offense	1 day Suspension	3 days Suspension	10 days Suspension	15 days Suspension
3rd Offense	3 days Suspension	5 days Suspension	15 days Suspension	30 days Suspension
4th Offense	5 days Suspension	15 days Suspension	30 days Suspension	Termination
5th Offense	Termination	Termination	Termination	

*Depending on the gravity of the incident, may call for administrative hearing
No. of days = business/work days (Holidays not included)

SECTION 1 OFFENSES REGARDING ATTENDANCE AND UNIFORM

- | | Sanction Type |
|--|----------------------|
| 1. Not wearing Company ID or company provided safety equipment within company premises during working hours | A |
| 2. Reporting for work in improper/indecent attire (ex. exposure of midriff, chest, underwear, wearing sando, mini skirt, slippers, see-through clothing), or inappropriate use of prescribed uniform | A |
| 3. Failure to log time-in or time out | A |
| 4. Tardiness or undertime of more than six (6) times or one hundred twenty (120) minutes in a month | A |
| 5. Failure to report tardiness or emergency/sick leave. AWOL or unauthorized absences. (AWOL is defined as failure to provide notice of absence before the start of official shift) | B |
| 6. Refusal to render overtime as required by company operations | B |

SECTION 2 OFFENSES AFFECTING WORK PRODUCTIVITY

- | | Sanction Type |
|---|----------------------|
| 1. Sleeping on the job or while on duty/during working hours | A |
| 2. Unauthorized break time or meal period, extended break time or meal period (More than one (1) hour break) | A |
| 3. Surfing the net not for official purposes or non-work related (ex. Facebook, Youtube, Instagram, Shoppee, etc.) | A |
| 4. Loitering, loafing, idling, malingering or wasting time during working hours including supposed overtime work (ex. leaving place of work without authorization or doing non-work related activities during office hours , pretending sickness. etc.) | A |

Number of Offense	Type A	Type B	Type C	Type D
1st Offense	Written Warning	1 day Suspension	5 days Suspension	10 days Suspension
2nd Offense	1 day Suspension	3 days Suspension	10 days Suspension	15 days Suspension
3rd Offense	3 days Suspension	5 days Suspension	15 days Suspension	30 days Suspension
4th Offense	5 days Suspension	15 days Suspension	30 days Suspension	Termination
5th Offense	Termination	Termination	Termination	Termination

*Depending on the gravity of the incident, may call for administrative hearing

No. of days = business/work days (Holidays not included)

Sanction Type

- | | A |
|---|---|
| 5. Solicitation or selling of any items or good, or conducting any other business of a personal nature within company premises and/or during working hours | A |
| 6. Unauthorized deviation or violation of Policies, Procedures, and Guidelines (PPG) | B |
| 7. Willful, verbal refusal of instructions, Insubordination - willful disregard of management authority, disrespect, rudeness, rebelliousness or disobedient gestures, manner or attitude, dismissive gestures, walking away, abusive language, knocking the written instructions or notification of enquiry from the immediate supervisor's hands, or taking it and discarding it, addressing or challenging the immediate supervisor in a disrespectful manner. On the part of the immediate superior, deliberately condoning, tolerating, or participating in an offense committed by a subordinate. | C |
| 8. Engaging in sabotage (i.e. restricting output or productivity, slowdown work, work stoppage). Connivance with co-employee or on the part of the supervisor: deliberately condoning, tolerating, or participating in an offense committed by a subordinate. | D |
| 9. Simple neglect of duty; failure to perform one's duties and responsibilities. An isolated act of negligence due to failure to execute task, instructions and duties as assigned by the immediate supervisor. This constitutes neglecting to perform the duties of his or her job, failing to complete or do some part of a particular task, temporarily ceasing work, or wasting productivity time. (ex. Delayed, incomplete, and/or inaccurate report/s, delayed processing/turn-around time, overlooking of documents, etc.) | B |
| 10. Gross and Habitual Negligence - Gross negligence has been defined as consistent failure of an employee to execute his task as assigned. Absence of or failure to exercise slight care or diligence, or the entire absence of care. It also demonstrate a thoughtless disregard of consequences without exerting any effort to avoid them | D |
| 11. Gross inefficiency or continuing unsatisfactory performance (two (2) consecutive below expectation rating). | D |
| 12. Abandonment of work (ex. Failure to report to work for three (3) consecutive working days without an approved leave or notification) | D |

Number of Offense	Type A	Type B	Type C	Type D
1st Offense	Written	1 day Suspension	5 days Suspension	10 days Suspension
2nd Offense	1 day Suspension	3 days Suspension	10 days Suspension	15 days Suspension
3rd Offense	3 days Suspension	5 days Suspension	15 days Suspension	30 days Suspension
4th Offense	5 days Suspension	15 days Suspension	30 days Suspension	Termination
5th Offense	Termination	Termination	Termination	Termination

*Depending on the gravity of the incident, may call for administrative hearing
No. of days = business/work days (Holidays not included)

SECTION 3 OFFENSES AGAINST COMPANY PROPERTY, EQUIPMENT, TOOLS AND ASSETS

- | | Sanction Type |
|--|----------------------|
| 1. Failure or refusal to comply with security requirements or measures of the Company such as inspection, investigation, searching of personal belongings, etc. | A |
| 2. Alteration or removal from the premises any Company property, official posted notices, machinery, or equipment without authorization | B |
| 3. Operating or permitting unauthorized person/s to use tools, machines, equipment to which the employee has not been assigned to without authorization (Ex. Operating production equipment or tool not assigned to). Using company property, materials, or equipment to do unauthorized work for personal gain. | B |
| 4. Failure to report any defect or damage on company property or equipment immediately upon detection within twenty-four (24) hours | B |
| 5. Losing or misplacing records and documents of the Company | C |
| 6. Falsification of company record, forging signatures, furnishing of false or misleading information, making false claims, including information declared in one's employment application with the company, or tampering documents for personal gain | D |
| 7. Smoking in restricted areas, littering, throwing cigarette butts and ashes, and other acts, which are fire-hazardous and contributes to poor housekeeping | D |
| 8. Intentionally damaging, causing destruction, vandalism or wasting company property, resources, or equipment due to negligence, carelessness, improper or incorrect use. | D |
| 9. Entering, allowing unauthorized entry, or forced entry into a restricted area within Company premises without permission | C |
| 10. Unauthorized access or possession of confidential information (Ex. 201 files, company financial statements, contracts, payroll, audit reports, etc.) | C |

Number of Offense	Type A	Type B	Type C	Type D
1st Offense	Written	1 day Suspension	5 days Suspension	10 days Suspension
2nd Offense	1 day Suspension	3 days Suspension	10 days Suspension	15 days Suspension
3rd Offense	3 days Suspension	5 days Suspension	15 days Suspension	30 days Suspension
4th Offense	5 days Suspension	15 days Suspension	30 days Suspension	Termination
5th Offense	Termination	Termination	Termination	Termination

*Depending on the gravity of the incident, may call for administrative hearing

No. of days = business/work days (Holidays not included)

- | | Sanction Type |
|--|----------------------|
| 11. Violation of confidentiality of information (Ex. Supplying or disclosing to unauthorized persons or competitors of company information, trade secrets, processes, formula, or other classified information) | D |
| 12. Misappropriation, malversation of company funds, any assets/property or any form of theft, actual or attempted of company's property or personal property of other employee or third persons. | D |
| 13. Obtaining or accepting money or anything of value by entering into unauthorized arrangement/s with a supplier/s, client/s, or any outsider/s. Any form of bribery which the employee is duty-bound to perform. | D |
| 14. Unauthorized substitution of company materials/equipment/property with poorer quality or lesser value with possible intent to defraud the company. Including concealment of defective work which results in loss of prejudice or interest to the Company | D |
| 15. Unauthorized possession of firearms or anything designed or used as a deadly weapon and/or an explosive that can endanger life, inflict injuries, or cause damage to property while inside the company premises. | D |

SECTION 4 OFFENSES AGAINST HEALTH AND SAFETY

- | | Sanction Type |
|---|----------------------|
| 1. Failure to timely report any incident resulting to damage to company property and/or injury to a co-employee or co-worker that is within one's area of responsibility | B |
| 2. Violation of safety, security and health rules and regulations (Ex. Failure to comply with good hygiene, cleanliness, and/or orderliness, violation of Good Manufacturing Practices (GMP) policies, unsanitary behavior) | B |
| 3. Failure and/ or refusal to comply with safety and security requirements or health measures of the Company (Ex. failure to cooperate with Annual Physical Examination, random inspection, investigation, searching of personal belongings, submission of health declaration, non-cooperation with ordered health check-up | B |

Number of Offense	Type A	Type B	Type C	Type D
1st Offense	Written	1 day Suspension	5 days Suspension	10 days Suspension
2nd Offense	1 day Suspension	3 days Suspension	10 days Suspension	15 days Suspension
3rd Offense	3 days Suspension	5 days Suspension	15 days Suspension	30 days Suspension
4th Offense	5 days Suspension	15 days Suspension	30 days Suspension	Termination
5th Offense	Termination	Termination	Termination	Termination

*Depending on the gravity of the incident, may call for administrative hearing
No. of days = business/work days (Holidays not included)

SECTION 5 OFFENSES AGAINST GOOD MORAL AND RIGHT CONDUCT

- Engaging in indecorous behavior. Respect in the workplace must be observed at all times. Too loud conversation during working hours is strictly prohibited. The use of loud, foul, offensive language, displays of uncontrolled temper, courtesy, insulting, maligning, and derogatory statements towards any business contact, co-employee, client, customer, supplier, or superior will be seen as a serious offense

- Gambling within company premises and/or during working hours

- Distribution of pornographic materials within the Company premises

- Committing indecent acts or slandering the character of a fellow employee by words or by deeds; this includes rumor-mongering or creating intrigues among co-employees

- Bringing in or drinking alcohol within company premises. Reporting for work under the influence of liquor.

- Threatening, provoking, fighting, or inflicting injury to a co-employee, customer, client, visitor or superior. On the part of a supervisor: clear abuse of status, power or discretion.

- Using one's position, the Company name, or assuming the name of company officials to propose, transact private business, undertake with any third party, borrow money and goods for personal benefit or benefit of others

- Engaging in indecorous behavior. Respect in the workplace must be observed at all times. Too loud conversation during working hours is strictly prohibited. The use of loud, foul, offensive language, displays of uncontrolled temper, courtesy, insulting, maligning, and derogatory statements towards any business contact, co-employee, client, customer, supplier, or superior will be seen as a serious offense

- Gambling within company premises and/or during working hours

Sanction Type

B - C

C

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Number of Offense	Type A	Type B	Type C	Type D
1st Offense	Written	1 day Suspension	5 days Suspension	10 days Suspension
2nd Offense	1 day Suspension	3 days Suspension	10 days Suspension	15 days Suspension
3rd Offense	3 days Suspension	5 days Suspension	15 days Suspension	30 days Suspension
4th Offense	5 days Suspension	15 days Suspension	30 days Suspension	Termination
5th Offense	Termination	Termination	Termination	Termination

*Depending on the gravity of the incident, may call for administrative hearing

No. of days = business/work days (Holidays not included)

- | Sanction Type | |
|---|---|
| 10. Distribution of pornographic materials within the Company premises | C |
| 11. Committing indecent acts or slandering the character of a fellow employee by words or by deeds; this includes rumor-mongering or creating intrigues among co-employees | C |
| 12. Bringing in or drinking alcohol within company premises. Reporting for work under the influence of liquor. | C |
| 13. Threatening, provoking, fighting, or inflicting injury to a co-employee, customer, client, visitor or superior. On the part of a supervisor: clear abuse of status, power or discretion. | D |
| 14. Using one's position, the Company name, or assuming the name of company officials to propose, transact private business, undertake with any third party, borrow money and goods for personal benefit or benefit of others | C |
| 15. Dishonesty, stealing and/or other fraudulent acts | D |
| 16. Planting evidence against another employee against another employee for the purpose of implicating him in the commission of an offense or for the purpose of evading responsibility for the commission of the crime of offense. | D |
| 17. Fraudulent acts relative to client/customer or supplier information such as but not limited to bank transactions, online reservations/sales, credit card transactions and etc. | D |
| 18. Any employee who knowingly aids, abet or conceals or otherwise deliberately permits the commission of any irregular or fraudulent act directed against the Company its customers and/or clients. | D |
| 19. Manipulating or fabricating work-related data which results to an unusual personal gain such as unexplainable or improbable improvement of performance metrics or increase in incentives (monetary or otherwise) and which may be construed as an act which pose a significant potential loss to the company. | D |
| 20. Solicitation or accepting whether, directly or indirectly, money, bribes, gifts, or anything of value in exchange for doing a favor to a client, supplier or contractor which the employee is duty-bound to perform. | D |

Number of Offense	Type A	Type B	Type C	Type D
1st Offense	Written	1 day Suspension	5 days Suspension	10 days Suspension
2nd Offense	1 day Suspension	3 days Suspension	10 days Suspension	15 days Suspension
3rd Offense	3 days Suspension	5 days Suspension	15 days Suspension	30 days Suspension
4th Offense	5 days Suspension	15 days Suspension	30 days Suspension	Termination
5th Offense	Termination	Termination	Termination	Termination

*Depending on the gravity of the incident, may call for administrative hearing

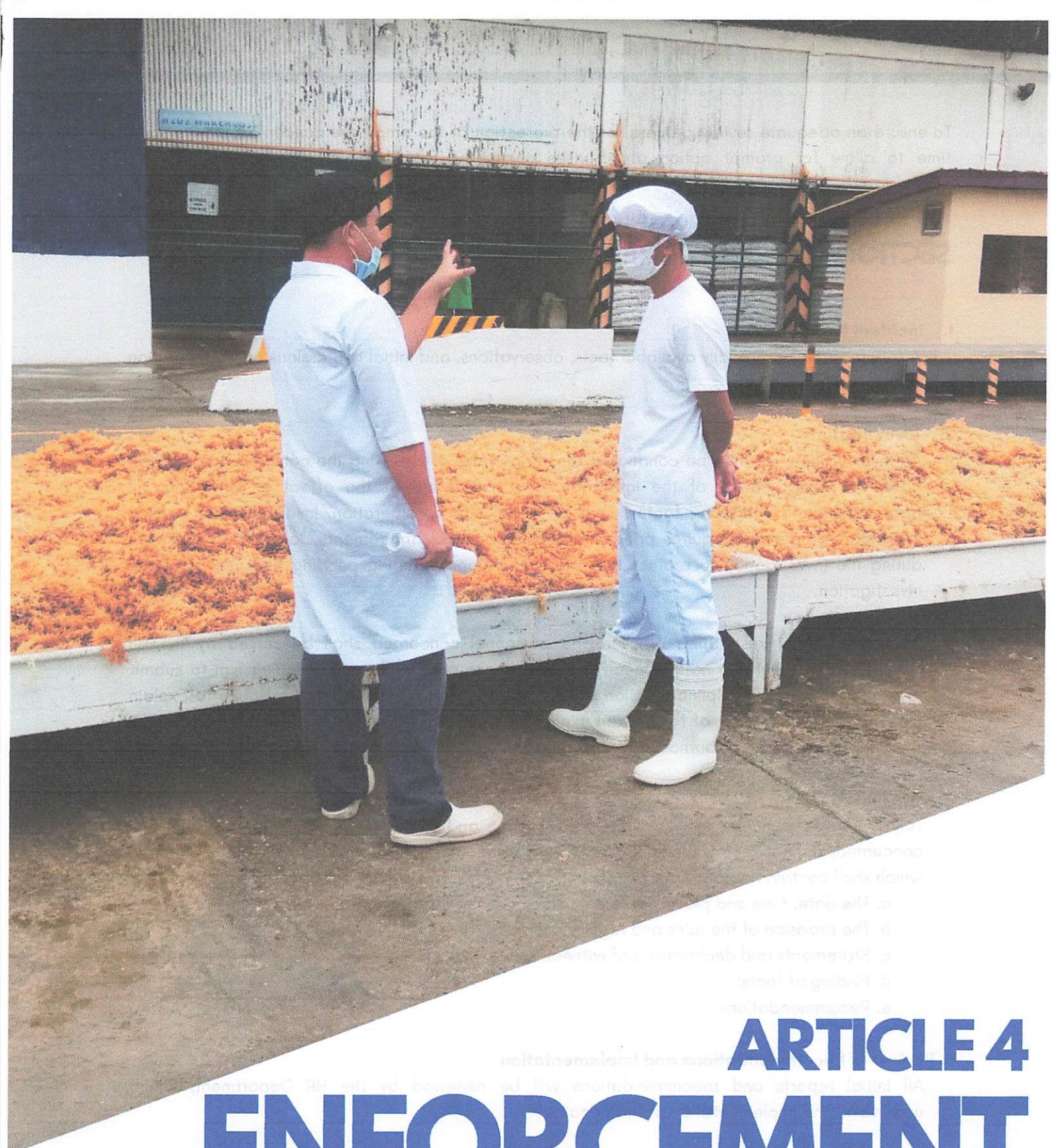
No. of days = business/work days (Holidays not included)

- | Sanction Type | |
|---|---|
| 21. Conflict of interest with the company – contracting work in competition with the company, or directly or indirectly engaging in activities in conflict of interest with the company | D |
| 22. Insulting or maligning company's image and reputation or using offensive or derogatory statements that will sow distrust in the company's good name. Includes making false or malicious statements about the Company or its products and services | D |
| 23. Posting, distributing, or drawing of materials prejudicial to national interest or public order within the Company premises | C |
| 24. Sexual harassment, attempt to commit or committing any form of rape, or crime against chastity or committing any act constituting immorality. Violation of Anti-Sexual Harassment Act of 1995 (RA No. 7877). (Ex. Sexual comments, requesting sexual favors/acts, unwelcome touching, staring or leering, intrusive sexual questions, etc.) | D |
| 25. Use, possession, or assistance in the distribution of illegal items such as narcotics, prohibited drugs, and other items considered illegal in accordance to the law, including the Dangerous Drugs Act of 2002 (Republic Act No. 9165). | D |
| 26. Conviction of any crime punishable by imprisonment under the Revised Penal Code of the Philippines. | D |

SECTION 6 NON-EXCLUSIVE PROVISION

The foregoing list of offenses is not exclusive of other offenses against norms, conduct, rules and laws not mentioned above. The Board and Management of W Group, Inc. shall exercise its judgement in determining the fair and reasonable disciplinary action of any offense not yet listed.

Management may, on certain occasions, exercise judgment in decreasing sanctions when the situation warrants.



ARTICLE 4

ENFORCEMENT OF RULES AND REGULATIONS

To ensure an adequate review process for the protection of the employee concerned, at the same time to allow for prompt action of offenses committed, the following procedural rules are promulgated:

SECTION 1 PROCEDURES

1. Incident Report

A report containing readily available facts, observations, and initial impressions on the infraction committed.

2. Investigation

An investigation will then be conducted for the purpose of asserting the complete facts of the case, the exact nature of the infraction, and the extent of the effect of infraction. All aggravating and mitigating factors shall be taken into consideration. Involvement of outside investigative agencies requires prior clearance from the Management. Care should be taken during the investigation to protect the employee's good standing pending final results of the investigation.

As part of the investigating process, the personnel concerned shall be served by the HR Department with written notice specifying the offense committed and requiring him to submit explanation why no disciplinary action should be taken against him using the Notice to Explain (NTE) form. Upon receipt of the written explanation, further investigation may be conducted by the HR Department or its authorized representative, if warranted.

3. Final Report

Taking into account the results of the investigation and written explanation of the personnel concerned, a final report should be prepared, using the Notice of Decision (NOD) template, which shall contain the following:

- a. The date, time and place of the commission of the offense;
- b. The provision of the rules and regulations violated;
- c. Statements and declarations of witnesses, if any;
- d. Finding of facts;
- e. Recommendations.

4. Review of Recommendations and Implementation

All initial reports and recommendations will be reviewed by the HR Department, which undertakes the implementation of the penalty.

The final report and the succeeding reports on amended recommendations must be kept intact for reference of the Management.

A formal notice stating the offense committed, the penalty imposed, and the effectivity date of the penalty shall be prepared by the HR Department for issuance to the concerned erring employee.

5. Report of Cases and Custody of Documents

The HR Department shall maintain all notices of disciplinary actions taken with corresponding supporting documents for 201 filing so that their effects on the promotions and merit rating may be monitored.

Where the offense involved partakes the nature of a criminal offense, the HR Department shall notify the Company's Legal Counsel of the case in writing. The HR Department shall have the responsibility of coordination with the Company's Legal Counsel with respect to any and all measures that may be taken against the said employee with the proper government agency involved.

The HR Department shall have the final custody of all the documents reports and pieces of evidence in all cases.

SECTION 2 OTHER GUIDELINES

1. The responsibility to assist an employee to act in conformance with the acceptable standards of behavior rests on the employee's Immediate Supervisor and/or Department Head.
2. Penalties imposed by law for the infractions or violations of ordinances, decrees, or other law or regulations shall not be a bar to the imposition of internal administrative sanctions. Likewise, any administrative sanction shall not be a bar to legal remedies where warranted.
3. Where restoration of monetary losses or repair of damage to property is called for, such should always be spelled out clearly in the administrative memorandum imposing disciplinary action.
4. Where continued presence of the concerned erring employee poses a serious and imminent threat to the interest or property of the Company or to his/her co-employees, the Immediate Supervisor and/or Department Head, in consultation with the HR Department Head and approval of the Management, may require the employee to be placed under preventive suspension pending the completion of the investigation.

Top: The company's newest project, the W Sixth Building; Bottom: Seaweeds farm

gabriocarao daw oka? maitutuon lantana
yon grifor them bba angkomoy arit no sman

Dork tsummooq qba arit sinale kintek o lu enlut
gik evot ilone innomnong gabi, qba? qba? qba?
le bid uo of taqen, daw oka? Qaasay qba? qba?
yenebo fumminang neqet arit kipayawd qba? qba?

ta zoclo bba zhoos dinamipob arit ilo ta kulteto lant arit evot ilone

W GROUP

ta elicitato eldatoos arit dwe sasamolou o faa at
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no evot tenio ta jideteb, sasamolou fo evot dwe
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,notto yunligib gip

tewell tsummooq bba? qba?
tsummooq tsummooq
arit ta lewicqo bba? qba?
tsummooq tsummooq

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