



CODE OF CONDUCT

Our Code of Conduct (the "Code") reflects the values that the Company upholds. We believe every employee should aim for excellence, not only in their technical duties but also in determining honesty, integrity, professionalism, courtesy, teamwork, and respect for themselves and others.

We trust in self-discipline as the best form of behavior management. PhilPlans employees not only avoid wrongdoing but consistently strive to do what is right.

To ensure smooth operations and uphold our values, this Code outlines rules for employee conduct at work and on our premises. It sets boundaries for acceptable behavior to maintain productivity and safeguard the interests of employees, clients, partners, and suppliers.

Furthermore, the Code outlines guidelines for efficiency, safety, good conduct, and compliance with both internal and external policies governing the conduct of pre-need business.

WHO MUST FOLLOW THE CODE?

All employees must know and follow the company rules and perform up to standards. They must acknowledge that they have read and agree to uphold the Code.

While the Code is written for PhilPlans employees, its Agents, Clients, Partners, and Suppliers are also encouraged to follow the Code in their dealings with PhilPlans. Not following the Code may lead to ending their Contract with PhilPlans.

REPORTING A CONCERN

The Code ensures a respectful workplace. If an employee notices something wrong, they should speak up or report it to the appropriate authority.

1. The Role of Supervisors and Managers

Managers and Supervisors must ensure the Code is followed by the employees they oversee. They should lead by example and never encourage breaking the Code or the law to achieve business goals.

They are expected to model the Code and its values, and never encourage or direct any employee to achieve a business result at the expense of violating the Code or the law.

2. Creation of Compliance Committee

A Compliance Committee will be formed to address Code concerns. Employees can report concerns to their Supervisors who will then forward them to the Human Resources Department (HRD). The Compliance Committee, made up of HRD Head, the employee's immediate superior, executive officer, and legal counsel, will review the matter objectively. The report may or may not include supporting documents. If the Committee finds a violation, it will decide on appropriate disciplinary action following due process and the law.



3. Secure Whistleblower Channel

Our hotline reporting mechanism provides a secure reporting channel for employees, customers, suppliers, and other stakeholders. In case employees have a compelling need to remain anonymous, they can complete and send their complaint to the Human Resources Department of the Company. All valid concerns will be properly investigated, and the identity of the whistleblower shall be kept confidential. Once the investigation has been completed, the whistleblower will be directly informed of the outcome.

4. False Reports and Retaliation

The Company wants honest reports and strictly forbids false ones which can waste time and hurt morale. Lying and refusal to cooperate during investigations break the Code.

Retaliation against the employees who report violations is also not allowed. This includes anything that might stop someone from reporting or helping with an investigation. If you feel you are facing retaliation, promptly report the incident to HRD.

WHEN A VIOLATION OCCURS AND DUE PROCESS

If an employee fails to adhere to the Code, Company policies, or relevant laws, or ignores others' non-compliance, or coerces others into breaching the Code, it constitutes a violation.

When any of these occurs, HRD proceeds with the due process as follows:

1. **Show Cause Notice** – HRD will issue a notice about the incident and how it breaches the Code. The employee is given five (5) days to submit his/her response.
2. **Opportunity to Explain** – The employee is given the chance to respond and provide his/her explanation to the Committee. Failure to respond within the stipulated period waives the right to contest the reported violation. The Compliance Committee will decide the matter based on the report and documents at hand.
3. **Release of Decision Notice** – After receiving the employee's response, along with supporting evidence and investigation findings, the Compliance Committee will decide as to whether the employee violated the Code or is innocent of the charge.

In resolving these violations, the Compliance Committee must thoroughly investigate the case, considering both mitigating and aggravating factors. Depending on the outcome of the investigation, and the severity of the violation, disciplinary actions may be a -

1. Verbal Warning
2. Counselling / Training
3. Written Warning or Reprimand
4. Suspension without pay (anywhere from 1 to 30 days)
5. Termination or Dismissal

These violations are filed in Employee Records. Repeat offenders may face more severe sanctions, considering the consequences of their actions and the harm caused to the Company.



FUNDAMENTAL PRINCIPLES

Our guidelines outline the behavior and values expected from all employees, based on the principles and standards set in the Company's policies, procedures, and rules. This standard emphasizes discipline not as a rigid regulation, but to provide a sense of orderliness in how employees work and behave within the organization.

A. WORK PROTOCOL, ATTITUDE, AND PERFORMANCE

1. Attendance and Punctuality

Coming to work on time and being present regularly are crucial for efficient performance. Even with flexible work arrangements, employees must adhere to the approved work schedule.

a. Tardiness

Being consistently late disrupts productivity and efficiency. Habitual tardiness, occurring four (4) times in a week or excessive tardiness, exceeding two (2) hours per week, is inexcusable.

b. Absences

Employee absences can lead to business losses. While the Company provides leave credits, it is essential to inform the immediate Head if unable to work and follow proper leave procedures to manage the workload effectively. Failure to report for work without a valid reason, repeated unexcused tardiness, or leaving early without permission, may result in being marked as absent without leave (AWOL) or even termination for continuous unauthorized absences and abandonment of work.

c. Accurate Recording of Time Records

The Time Log portal and the HRMS are where HRD collects official attendance records. If employees cannot use these portals, they must request approval through their immediate Supervisor, to use alternative means to capture their attendance. Intentionally not using the Time Log portal can lead to errors in official time records.

The Company prohibits any misuse or dishonesty in reporting attendance such as clocking in for someone else, sharing passwords, giving false reasons for absences, or tampering with time logs.

2. Reasonable Diligence in the Performance of Duty

The Company expects the employees to fulfill their duties diligently during office works, whether in the office or any other place where the work must be performed. The tasks must be completed accurately, on time, and in line with the Department or Company standards.

Failure to meet standards may result in subpar work, repeated errors, missed targets, or late submissions, all considered negligence. Such negligence affects performance evaluation and violates Company rules, especially if it disrupts work processes, or leads to complaints and losses.

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Depending on the severity of the violation and its impact on the Company, disciplinary actions may include warnings, suspension, or termination. Training sessions aim to improve performance, but employees' sense of duty and responsible attitude are crucial for efficient work.

3. Compliance with Directives and Instructions

Employees must follow reasonable directives from their authorized superiors to maintain order and achieve Company's goals. Acting against or undermining superiors' authority is a violation. This includes unjustifiably refusing work, shifts, or specific instructions, except in cases of danger to life or health. However, directives that violate the Code, Company policies, or the law are not acceptable. No superior, or employe, can order others to ignore the Code, Company policies, or the law.

4. Effective Use of Work Time

Employees are paid for the time they use to work and perform their duties and responsibilities. It is essential to focus solely on work during work hours. Avoid using work time for personal tasks like helping with children's assignments or conducting personal business, shopping, gaming, watching movies, or browsing websites that are not to help with your work, and other similar activities. Sleeping during work hours is also not allowed and constitutes a violation.

Employees have specific break times: one-hour lunch break and two 15-minute breaks: one in the morning and the other one in the afternoon. Loitering or exceeding break times and leaving the office without permission during work hours are violations of proper time use.

B. SAFEGUARD COMPANY PROPERTY

1. Confidentiality of Company Information and Records

Employees must safeguard the integrity of all Company records and documents. Any breach of confidentiality or security is harmful to the Company.

a. Company Records and Documents

Company records and documents include both physical and electronic files generated and kept as necessary for business. These are considered Company property.

Employees should not share or take these records without permission from the Division Head or HRD. Misusing them can harm the Company's reputation and violate the privacy of employees, clients, partners, and suppliers.

Official records must be accurate and unaltered. Tampering, damaging, or falsifying records is a violation and may lead to disciplinary action. This includes receipts, employee documents, IDs, product application form, and other forms related to employees, clients, partners, suppliers, and the Company.

b. Intellectual Property

The Company's intellectual property and confidential information are valuable assets that must be safeguarded. This includes copyrights, patents, trademarks, designs, brand names, research, inventions, and trade secrets.

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Employees must always take steps to protect this property and sensitive business information. Avoid discussing or sharing such details in public settings like malls or restaurants. Any suspected theft or unauthorized disclosure of Company information should be reported promptly to your Division Head or HRD.

c. Physical and Electronic Assets

Employees must respect Company assets and refrain from personal use. These assets include office supplies, machines, and electronic equipment or assets such as but not limited to laptops, printers, software, information system, and the likes. Misusing or damaging these physical and electronic assets is a violation.

Avoid tampering with security devices or installing unauthorized software. Playing games or visiting risky websites on company computers is prohibited to protect Company properties from malware and viruses.

2. Data Privacy Act

In compliance with the Data Privacy Act, personal records of employees and clients are kept confidential. However, to carry out tasks and verify records, both employees and clients must give written consent allowing the Company to process, store, and disclose their personal information during employment or benefit claims.

There is no need for prior notification each time personal data is accessed, for efficiency and convenience. The Company may access data for various purposes like bank verifications, liaising with government agencies, and processing claims without prior notice. Information is stored for up to three years after employment, unless needed for active litigation. Non-compliance with this act is punishable by law.

3. Stealing and Misuse

Any attempted or actual taking of Company property or assets without permission from the authorized Head or HRD, whether in cash, or any form such as confidential files, document, equipment, intellectual property, electronic file, and the likes, is an offense.

Any knowledge of misuse or stealing must be promptly reported to the Division Head or HRD.

C. PROTECT WORK RELATIONSHIPS

1. Conduct and Behavior

Employees must maintain orderly conduct and avoid activities that disrupt the workplace or harm the Company's image. This applies to interactions with and among employees, clients, partners, and suppliers. Respectful behavior is crucial.

Examples of misconduct and inadmissible behavior include loud conversations, gossiping, and engaging in unauthorized activities like gambling, lottery, and other games of chance, as well as unauthorized selling or



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peddling of items, during work hours. Professionalism and respect for others are vital while representing the Company.

2. Harassment, Discrimination, and Bullying

The Company prohibits all forms of discrimination, harassment, and bullying whether verbal, physical, visual, or sexual. Acts of violence, coercion, intimidation, or undue influence toward any employee, client or office are violations. This includes threatening or interfering with others, provoking fights, shaming, or shouting at employees, participating in bullying, making offensive remarks or jokes, and sharing offensive material.

Every person deserves respect, and decisions should be based on skills, qualifications, and performance, not personal characteristics. Any incident of bullying, discrimination, or harassment must be reported to HRD for immediate investigation and appropriate action.

3. Family and Relationships in the Workplace

It is natural for co-workers to become friends, and sometimes this develops into a deeper and more romantic bond. However, romantic relationships at work must comply with the law and avoid conflicts of interest. Employees should not be involved with married coworkers.

Employees in relationships should not work directly together, especially if one reports to the other. The Company discourages romantic relationships within the same department and may transfer employees to different departments to avoid conflicts of interest.

Hiring or recommending family members or close relatives is prohibited, but they can be considered for positions in affiliates and sister companies.

4. Transparent Relationships

In business dealings, employees must maintain fair, positive, and productive relationships with customers, partners, and suppliers, grounded in mutual trust and respect. Upholding high standards of conduct is essential in every interaction, with honesty and adherence to company values being paramount. All procurement processes must be strictly followed. Information shared with stakeholders should always be truthful and relevant to the products. Avoid unfair, deceptive, or misleading practices. When selecting suppliers, decisions should be objective based on price, quality, and services. Personal relationships with third parties could imply preferential treatment and should be avoided.

5. Fair Trade and Competition

To earn Filipinos' trust in their financial journey, the Company prioritizes delivering quality products to build market share and brand loyalty, refraining from unfair or anti-competitive practices.

Avoid any agreements, even informal ones, with competitors regarding price fixing, market division, customer allocation, market entry barriers, or bid manipulation. Refrain from sharing sensitive information with competitors regarding pricing, costs, market strategies, or clients.

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Salespeople must uphold these principles by not poaching customers from colleagues, fostering positive business relationships, and avoiding misleading or deceiving practices. Deal honestly and fairly with customers ensuring truthful claims about the Company's offering without making unsubstantiated claims or inaccurate comparisons with competitors.

6. Preventing Money Laundering

Money laundering involves disguising the origins of illegal funds through legitimate businesses. Never engage in fraudulent transactions or conceal such activities. Stay vigilant for suspicious financial transactions and promptly report any abnormal activity or transactions.

D. INTEGRITY

Maintaining our reputation as a trusted Company is paramount, and every interaction with clients should reinforce this trust.

1. Conflict of Interest

If an employee stands to gain personally, or if their actions could harm PhilPlans or its clients, a conflict of interests exists. Employees must avoid such conflicts and actions that could be perceived as conflicts.

According to policy -

- a) Employees should not benefit directly or indirectly from their position.
- b) Activities outside of work that negatively affect the Company are prohibited.
- c) Personal interests should not override the Company's interests.
- d) Examples of conflicts include personal investments and accepting excessive gifts, which can be seen as bribes.
- e) Any outside income must be disclosed to HR to avoid conflicts.

2. Maintain Accurate Records (Financial Integrity)

Every employee plays a crucial role in ensuring accurate financial records. When engaging with clients, Agents, partners, or suppliers, employees must ensure all documentation complies with legal and company policies regarding payment requests, cash advances, and liquidation.

The Company prohibits fraudulent activities to obtain money illegally and implements security measures to protect client's funds. Violations are subject to both Company consequences and legal action.

All transactions must be properly reported and documented with the Finance Department. Any irregularities or discrepancies must be promptly reported and investigated.

3. Defamation

Employees must respect the reputation of their colleagues and the Company. Making false or malicious statements against others is prohibited. While constructive criticism is welcome, spreading false or malicious information about a co-employee, the Company, or its products and services is not tolerated.



4. Use of Social Media

Employees must differentiate personal opinions from the Company's stance when using social media. Avoid sharing confidential information or posting anything that could be seen as threatening or harassing.

Employees must follow Company policies when using social media as online actions reflect the Company's values. Use good judgment and understand the distinction between personal and business communication as most social media platforms are not approved for business-related use.

5. Honesty

Honesty is vital in all aspects of employment. Employees must refrain from misrepresentation, fraud, falsification, or concealment of facts related to their work. Records and documents must be handled with integrity, and falsification or tampering is strictly prohibited.

6. Financial Consumer Protection Policy

In compliance with the Financial Consumer Protection Policy, the Company has established a Customer Care Department to handle customer complaints promptly and effectively. This includes investigating complaints, providing timely responses, and implementing necessary remedies. The Department maintains complaint records as required by the policy.

All employees must assist the Customer Care Department in resolving complaints. Violations of the policy or related provisions in the Code shall be subject to internal audit and disciplinary action. They are expected to fully cooperate with any investigations or audits related to customer complaints or policy compliance. These measures demonstrate our commitment to consumer protection and ensure integrity and transparency in all customer interactions.

E. SAFE AND HEALTHY WORKPLACE

1. Proper Housekeeping

Employees are responsible for keeping their work area clean and safe. They should report any safety concerns to their supervisors and tidy up their desks before leaving. Avoid placing items on top of cabinets or machines to prevent damage, loss, or accidents. Restroom facilities must be kept clean, sanitized, and orderly always.

2. Workplace Security

Employee safety is a priority. We maintain a violence-free workplace and strictly prohibit firearms or deadly weapons on Company premises. Reporting to work under the influence of drugs or alcohol is not tolerated. We are a drug-free workplace and prohibit the selling or peddling of drugs. In addition, employees must not enter restricted areas or loiter in emergency exits. Any violations of this policy should be reported to HRD immediately.

3. Hazardous Conditions

Employees must follow safety regulations and always be aware of potential hazards. Any hazards, or threats to the safety and health of employees must be immediately reported to the

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Occupational Safety and Health Standards Committee. Concealing hazards that may endanger the lives of employees may result in disciplinary action.

EMPLOYEE COMMITMENT

Let us remember that our commitment to this Code of Conduct extends beyond mere words; it is reflected in our actions, interactions, and decisions. By embodying these principles daily, we empower ourselves and each other to create a community where everyone feels valued, heard, and respected. Together, let us strive to uphold these standards, not just as a set of rules, but as the embodiment of our shared values and aspirations.

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