



GT CAPITAL
HOLDINGS INCORPORATED

EMPLOYEE HANDBOOK¹

¹Approved for Public View



GT CAPITAL HOLDINGS, INC.

OUR VISION

To be leading conglomerate, dominant in all sectors invested, most sought strategic partner in the Philippines, as a major contributor to the nation's sustainable development.

OUR MISSION

GT Capital Holdings, Inc. a Philippine conglomerate with a strategic business portfolio, has a heritage of leadership in the vital sectors of financial services, automotive assembly and distribution, insurance, property development, and infrastructure and utilities that are essential to national development.

It has earned its stature of prominence in these key sectors by blending local ingenuity and resources with the technology and expertise of best-of-class global business partners.

Anchored on our core values of integrity, excellence, respect, and sustainable value creation, we fulfill our mission to ensure long-term value for our stakeholders by creating a synergistic business portfolio contributing to our nation's sustainable development.

CORPORATE CORE VALUES

INTEGRITY

Above everything else, we practice consistent adherence to ethical and moral values under all circumstances both from an institutional and individual basis. Such values are embedded in our corporate culture, which has earned for us the trust and confidence of our clients, investors, and business partners.

EXCELLENCE

Each of the group subsidiaries and affiliates has a solid track record of consistently delivering excellence in all our products and services, resulting in the highest level of satisfaction to our customers and stakeholders, who account for our continued success and leadership in each of the sectors where we are present. Our human capital or workforce is highly equipped with the proper education, knowledge, and expertise to successfully carry out their respective roles and responsibilities within the Group to the best of their ability. Our

excellence and capability as an organization have allowed us to become one of the most credible and trusted conglomerates in the country.

RESPECT

We take a special regard for the individual, for their empowerment, and the diversity of opinions, resulting in a more balanced view of our business proposition, open to different perspectives, constantly challenging assumptions and re-visiting previously set ways, within the framework of a shared vision and a shared corporate culture, with the end objective of constant improvement.

SUSTAINABLE VALUE CREATION

We are committed to planting the seeds today that will result in the creation of sustainable stakeholder value in the future. We believe that taking a long-term and sustainable perspective is essential to contributing to nation's sustainable development.



1.4 Conflict of Interest

1.4.1 Purpose

The purpose of this policy is to serve as guidance in identifying and managing conflicts of interest as it may arise.

1.4.2 Definition of Term

Conflict of interest

A situation when an individual or organization is involved in multiple interests; one of which could possibly corrupt the motivation for an act in expense of the other.

1.4.3 Policies

1.4.3.1 All Company employees shall refrain from engaging in any activity which will, in any way, interfere or run in conflict with their work or jeopardize the Company's interest.

1.4.3.2 As it is not possible to enumerate and describe all situations that may constitute conflict of interest, employees shall be expected to exercise professional and sound judgment, to seek advice when appropriate, and to adhere to the highest ethical standards in conduct of their personal and professional affairs.

1.4.3.3 The following shall be the guidelines on common types of conflicts:

1.4.3.3.1 CONFIDENTIALITY

Employee/s shall avoid disclosing or using for personal benefit, or for the benefit of others, confidential information concerning any aspect of the Company's business acquired as a result of the employee/s' relationship with the Company. An employee shall be held liable to the Company for any benefit gained from improper use of such information or any damages sustained by the Company as a result of improper disclosure of such information.



1.4.3.3.2 GIFTS AND ENTERTAINMENT

Generally, employees shall not offer gifts or extend favors, either directly or indirectly, to those with whom the Company does business with. Employees may provide advertising novelties, promotional items of nominal value, or modest gifts that follow generally accepted and customary business practices if:

- a. They are given only occasionally
- b. They are unsolicited by the recipient
- c. They do not even give the appearance of unduly influencing or obligating the recipient or of providing an improper advantage to the Company
- d. Their subsequent disclosure would not be embarrassing to the Company or to any of the parties involved

Employees shall not solicit or accept gifts, favors or loans, either directly or indirectly, from those with whom the Company do business with. Advertising novelties, promotional items of nominal value, or modest gifts that follow generally accepted and customary business practices may be received subject to the same criteria for gift giving identified above.

Entertainment is also an accepted business custom when conducted within proper limits. Employees may participate in business-related functions, including the giving of meals on occasion, as they are normal and permissible business practice. As long as an employee of the Company is present and with appropriate approval, these and other forms of business-related entertainment, such as providing tickets to sporting or other events, or golf outings, shall be permissible if the value and frequency of such entertainment is reasonable and appropriate and otherwise meets the criteria for gift-giving stated above.

Further, employees may only accept the kind of entertainment which they, in turn, are permitted to extend to others. Generally, only those employees who are authorized to entertain may accept entertainment.



1.4.3.3.3 INDIRECT INTERESTS AND RELATIONSHIPS

Family or personal relationships might give the appearance of influencing employee judgment to their personal advantage or to the undue advantage of a third party. Employees shall disclose to the appropriate Company officer any situation in which a relative has an interest in any Company transaction or has an ownership interest in a client, competitor, supplier, or customer.

1.4.3.3.4 CORPORATE OPPORTUNITIES

Employees shall not appropriate or divert, to any other person or entity, a business or financial opportunity which the employee learns of or develops in the course of employment and which the employee knows, or reasonably could anticipate, the Company would have an interest in pursuing.

1.4.3.4 Directors shall disclose their interest in transactions and any other conflict of interest. Disclosure may be done in either the Company's Annual Report or the minutes of the Annual Stockholders' Meeting.

1.4.3.5 Employees shall disclose or report any situation or activity that may involve a conflict of interest immediately in writing to their immediate superior or any officer.



1.5 Information Systems Security Guidelines

1.5.1 Purpose

The purpose of this policy is to set out guidelines on the proper use of technology resources to ensure confidentiality of all information maintained by the Company and to protect the interests of its stakeholders.

1.5.2 Policies

The following guidelines shall be observed:

1.5.2.1 ELECTRONIC COMMUNICATION

- 1.5.2.1.1 Use professional judgment in choosing the wordings when communicating via email as it shall be treated as formal communication.
- 1.5.2.1.2 Forwarding of internal emails to any external email accounts including personal email shall be prohibited unless otherwise covered with appropriate authorization.
- 1.5.2.1.3 Disclosing email log-in passwords to any other parties shall be prohibited. Employees shall be responsible for all activities on their emails or for all activities that originate from their emails.
- 1.5.2.1.4 Use of email for personal use is allowed but sat minimal levels only.
- 1.5.2.1.5 Highly sensitive and confidential files shall always be encrypted when sent via email.
- 1.5.2.1.6 Disseminating emails containing chain letters or warning messages to your co-workers shall be avoided.
- 1.5.2.1.7 A standard disclaimer shall be used for outgoing emails to reiterate rule on information security in electronic communication:

“This e-mail and any file transmitted with it are confidential and intended solely for the addressee. If you have received this message in error, please notify the sender and delete it immediately. Any use, disclosure, or copying of any information contained in this message is strictly prohibited. Considering that electronic communication is unguaranteed to be secured and error-free, the Company accepts no liability for any damage caused by this e-mail.”



1.5.2.2 INTERNET SECURITY

- 1.5.2.2.1 Internet access shall be used solely for business-related matters.
- 1.5.2.2.2 Visits to unlawful or inappropriate web sites and chat rooms shall be strictly prohibited.
- 1.5.2.2.3 Posting of confidential or sensitive information on chat rooms, bulletin boards or forums using the Company's network or company provided email shall be prohibited.
- 1.5.2.2.4 Downloading files from unknown sources shall be avoided. The validity of the file or program being downloaded shall be verified always.

1.5.2.3 ONLINE SOCIAL NETWORKING SITES

- 1.5.2.3.1 Access to any social networking sites during office hours shall be strictly prohibited. Visit to these sites may be allowed during break hours and after office hours provided that professional judgment is exercised.
- 1.5.2.3.2 Use of Company email address to register to online social networking sites shall be strictly prohibited.
- 1.5.2.3.3 Caution shall be observed in posting information on social networking sites. Always take time in reading privacy guidelines prescribed by these sites.



1.5.2.4 SAFEKEEPING AND PROPER USAGE OF ASSIGNED EQUIPMENT

- 1.5.2.4.1 When leaving work area, employees shall lock their computer screens to prevent unauthorized access to their computers.
- 1.5.2.4.2 Employees shall not share their security log-in passwords to any person.
- 1.5.2.4.3 Employees shall encrypt their equipment's hard drive to secure all data contained in it and to prevent unauthorized access.
- 1.5.2.4.4 Employees shall keep their water/soda bottles and greasy food away from the equipment to avoid accidental spills that may lead to short circuit and loss of data.
- 1.5.2.4.5 Gate pass, as approved by immediate superior, shall be submitted to HR & Administration Head whenever an employee brings out office property from the Company premises.
- 1.5.2.4.6 In case of damage or loss of an assigned equipment and/or its peripherals, the custodian employee shall submit an incident report within three (3) working days after the incidence of damage or loss. The incident report shall state the complete circumstances behind the damage or loss incurred. The incident report may either be submitted in writing or via email to the HR & Administration Head.
- 1.5.2.4.7 All assigned equipment shall be returned when the custodian employee is separated with the Company.



2 Code of Discipline

Professionalism, high ethical standards, discipline, integrity and honesty are of fundamental importance to the welfare of the Company. These are also critical in order to achieve efficiency and effectiveness necessary to its success. All employees are expected to conduct themselves in a manner befitting their respective positions and are bound at all times to safeguard and promote the interest of the Company. To this end, it is necessary that discipline and order is maintained.

Positive motivation rather than punitive control should characterize the implementation of these rules and regulations. Thus, penalties should be restored only when necessary and only to the extent necessary. Sanctions should be to correct unacceptable conduct or to restore the integrity of order and discipline, never to serve as a mere display of power. To this end, due process must be observed at all times. Actions must be timely, and prudence must accompany every administrative action. The person in charge of investigating the case should be unbiased and open-minded.

Punishment of any employee under this code shall not bar his prosecution in the proper court of justice if the same act constitutes a violation of law.

2.1 Purpose

The purpose of this policy is to ensure efficient and successful conduct of its operations and protection of all concerned. Also, it is deemed to ensure fairness and uniformity in the application of discipline to all employees.

2.2 Scope

All employees, including those who have resigned but have not been issued a clearance by the Company of his/her accountabilities, are expected to familiarize themselves with the rules and regulations set by this Code and to strictly abide by them.



2.3 Categories of Offenses and Disciplinary Actions

For purposes of classification, offenses subject to disciplinary actions are classified under headings Category A, Category B, Category C, Category D and Category E. These classifications were made in accordance with the corresponding disciplinary actions that each specific offenses, merits, as follows:

Category	Level of Offense	Disciplinary Action
Category A	1st Offense	Verbal Reprimand
	2nd Offense	Written Reprimand with Warning
	3rd Offense	One (1) week Suspension
	4th Offense	Two (2) weeks Suspension
	5th Offense	Dismissal
Category B	1st Offense	Written Reprimand with Warning
	2nd Offense	One (1) week Suspension
	3rd Offense	Two (2) weeks Suspension
	4th Offense	Dismissal
Category C	1st Offense	One (1) week Suspension
	2nd Offense	Two (2) weeks Suspension
	3rd Offense	Dismissal
Category D	1st Offense	Dismissal
Category E	-	Management reserves the right to impose a penalty ranging from Reprimand to Separation depending on the severity and circumstances of the case

2.4 List of Offenses and Respective Disciplinary Actions

LIST OF OFFENSES	DEGREE OF OFFENSE				
	First	Second	Third	Fourth	Fifth
A. OFFENSES AGAINST COMPANY INTERESTS AND POLICIES					
<i>A-1. Dishonesty</i>					
Falsification of Company records or any misrepresentation of personal record when applying for employment with the Company. (Category D)	Dismissal	Not applicable	Not applicable	Not applicable	Not applicable
Bribery or offering or accepting anything of value for personal gain but against the interest of the Company. (Category D)	Dismissal	Not applicable	Not applicable	Not applicable	Not applicable
Giving false testimony during Company investigation or administrative fact-finding process. (Category D)	Dismissal	Not applicable	Not applicable	Not applicable	Not applicable
Unauthorized disbursement and/or misappropriation of Company funds or disposal of Company properties. (Category D)	Dismissal	Not applicable	Not applicable	Not applicable	Not applicable
Unauthorized revelation of confidential information or disclosure of Company trade secret or trade practices or processes or any other restricted / confidential information to outsiders or to those not authorized to process such information, or engaging in any other forms or acts of sabotage or espionage. (Category D)	Dismissal	Not applicable	Not applicable	Not applicable	Not applicable
Deliberate careless submission of any item of fraudulent expense for the Company account. (Category D)	Dismissal	Not applicable	Not applicable	Not applicable	Not applicable
Unauthorized altering of time card/daily time record. (Category D)	Dismissal	Not applicable	Not applicable	Not applicable	Not applicable
Any attempt to falsify or pad travel expense reports, receipts, invoices or any other documents upon which reimbursement is based. (Category D)	Dismissal	Not applicable	Not applicable	Not applicable	Not applicable
Releasing or taking out from Company premises more than what is authorized in the invoice, delivery receipt or gate pass. (Category D)	Dismissal	Not applicable	Not applicable	Not applicable	Not applicable



LIST OF OFFENSES	DEGREE OF OFFENSE				
	First	Second	Third	Fourth	Fifth
Engaging or conniving in anomalous transactions. (Category D)	Dismissal	Not applicable	Not applicable	Not applicable	Not applicable
The commission of any act or offense similar or analogous to any of the foregoing shall be given the corresponding penalty.					
<i>A-2. Negligence of Duty</i>					
Loafing/wasting time or horse playing or prolonging rest or break periods for more than what is authorized, or loitering in other areas that is not his place of assignment while on duty. (Category B)	Written Reprimand with Warning	One (1) week Suspension	Two (2) weeks Suspension	Dismissal	Not applicable
Leaving the Company premises during working hours without permission from immediate superior. (Category B)	Written Reprimand with Warning	One (1) week Suspension	Two (2) weeks Suspension	Dismissal	Not applicable
Sleeping or napping while on duty. (Category A)	Verbal Reprimand	Written Reprimand with Warning	One (1) week Suspension	Two (2) weeks Suspension	Dismissal
Reading of materials that are irrelevant to the work of employee during office or working hours. (Category A)	Verbal Reprimand	Written Reprimand with Warning	One (1) week Suspension	Two (2) weeks Suspension	Dismissal
Malingering or feigning illness to avoid doing assigned work or malingering to avoid returning to work. (Category B)	Written Reprimand with Warning	One (1) week Suspension	Two (2) weeks Suspension	Dismissal	Not applicable
Willfully holding back, slowing down, hindering or limiting work output or giving instructions to fellow employees to hold back, slow down, hinder or limit work output. (Category C)	One (1) week Suspension	Two (2) weeks Suspension	Dismissal	Not applicable	Not applicable
Unauthorized or unofficial vending, soliciting, collecting for any purpose or conducting private business during office hours on Company premises. (Category A)	Verbal Reprimand	Written Reprimand with Warning	One (1) week Suspension	Two (2) weeks Suspension	Dismissal



LIST OF OFFENSES	DEGREE OF OFFENSE				
	First	Second	Third	Fourth	Fifth
Absence from work without permission or failure of the employee to notify immediate superior or Department Head or in the absence, the HRAD regarding sickness or emergency leave of absence on or before 9:30 a.m. of the first day of absence shall be considered absence without official leave (AWOL). In case employee is incapacitated to do so, the immediate family member must notify the Company either through phone call or personally talking with the aforementioned Company officials or through other means of communication.					
a. AWOL for 2 consecutive days or less. (Category A)	Verbal Reprimand	Written Reprimand with Warning	One (1) week Suspension	Two (2) weeks Suspension	Dismissal
b. AWOL for 3 to 5 consecutive days. (Category B)	Written Reprimand with Warning	One (1) week Suspension	Two (2) weeks Suspension	Dismissal	Not applicable
c. AWOL for 6 to 9 consecutive days. (Category C)	One (1) week Suspension	Two (2) weeks Suspension	Dismissal	Not applicable	Not applicable
d. AWOL for 10 or more consecutive days. (Category D)	Dismissal	Not applicable	Not applicable	Not applicable	Not applicable
Frequent or habitual tardiness (which is defined as 3 times and/or with more than 60 minutes late for work in a month). (Category A)	Verbal Reprimand	Written Reprimand with Warning	One (1) week Suspension	Two (2) weeks Suspension	Dismissal
Failure to carry out reasonable verbal or written job or work transaction issued by the employee's superior. (Category B)	Written Reprimand with Warning	One (1) week Suspension	Two (2) weeks Suspension	Dismissal	Not applicable



LIST OF OFFENSES	DEGREE OF OFFENSE				
	First	Second	Third	Fourth	Fifth
Damaging Company equipment or property, willful or through negligence or failure to follow any procedure (SOP) that have been outlined by the Company, resulting to some loss on the part of the Company. (Category E)	Management reserves the right to impose a penalty ranging from Reprimand to Separation depending on the severity and circumstances of the case				
Failure to report for work on emergency overtime whereby employee had been duly advised and he gave commitment, hence, scheduled for such emergency overtime. (Category C)	One (1) week Suspension	Two (2) weeks Suspension	Dismissal	Not applicable	Not applicable
Violation of Company safety regulations or common safety practices involving personal and Company property to some loss on the part of the Company and/or employee. (Category E)	Management reserves the right to impose a penalty ranging from Reprimand to Separation depending on the severity and circumstances of the case				
The commission of any act or offense similar or analogous to any of the foregoing shall be given the corresponding penalty therefore.					
<i>A-3. Insubordination</i>					
Willful refusal to carry out reasonable verbal or written job or work transaction issued by the employee's superior. (Category C)	One (1) week Suspension	Two (2) weeks Suspension	Dismissal	Not applicable	Not applicable
The commission of any act or offense similar or analogous to any of the foregoing shall be given the corresponding penalty therefore.					
<i>A-4. Offenses against Timekeeping</i>					
Failure of employee to file vacation leave of absence at least one (1) working day ahead of schedule. (Category A)	Verbal Reprimand	Written Reprimand with Warning	One (1) week Suspension	Two (2) weeks Suspension	Dismissal
Failure of employee to properly file incurred sickness or emergency leave of absence on his first day upon returning for work. (Category A)	Verbal Reprimand	Written Reprimand with Warning	One (1) week Suspension	Two (2) weeks Suspension	Dismissal



LIST OF OFFENSES	DEGREE OF OFFENSE				
	First	Second	Third	Fourth	Fifth
Failure of employee to file the necessary official business (OB) form as per policy. (Category A)	Verbal Reprimand	Written Reprimand with Warning	One (1) week Suspension	Two (2) weeks Suspension	Dismissal
The commission of any act or offense similar or analogous to any of the foregoing shall be given the corresponding penalty there for.					
<i>A-4. Carelessness with Regard to Employee's Health</i>					
Having a serious contagious disease which may endanger the health of other employees and, knowing about it, fails to report and willfully withholds information thereon to Company authorities. (Category D)	Dismissal	Not applicable	Not applicable	Not applicable	Not applicable
Failure to report for a medical examination or when instructed by management (Category A)	Verbal Reprimand	Written Reprimand with Warning	One (1) week Suspension	Two (2) weeks Suspension	Dismissal
The commission of any act or offense similar or analogous to any of the foregoing shall be given the corresponding penalty there for.					
B. OFFENSES AGAINST PERSONS					
Attempting to or inflicting bodily injury to a Company official, employee or guest or client during Company time or premises or within the Company premises during Company-sponsored activity. (Category D)	Dismissal	Not applicable	Not applicable	Not applicable	Not applicable
Quarreling or creating trouble or fighting on Company time and/or premises. (Category C)	One (1) week Suspension	Two (2) weeks Suspension	Dismissal	Not applicable	Not applicable
The commission of any act or offense similar or analogous to any of the foregoing shall be given the corresponding penalty.					
C. OFFENSES AGAINST PROPERTIES					
Theft, robbery, stealing or attempting to steal from the Company or from the fellow employee or guest or client on company time and/or premises. (Category D)	Dismissal	Not applicable	Not applicable	Not applicable	Not applicable



LIST OF OFFENSES	DEGREE OF OFFENSE				
	First	Second	Third	Fourth	Fifth
Unauthorized use of Company property or using company time, material or equipment to do unauthorized work or to do an activity for personal benefit. (Category B)	Written Reprimand with Warning	One (1) week Suspension	Two (2) weeks Suspension	Dismissal	Not applicable
Unauthorized use of Company property or using company time, material or equipment for illegal purposes. (Category D)	Dismissal	Not applicable	Not applicable	Not applicable	Not applicable
Malversation of Company funds. (Category D)	Dismissal	Not applicable	Not applicable	Not applicable	Not applicable
Obtaining Company supplies or materials on fraudulent orders. (Category D).	Dismissal	Not applicable	Not applicable	Not applicable	Not applicable
Entering or assisting any person to enter any restricted area without authorization or proper permission. (Category B)	Written Reprimand with Warning	One (1) week Suspension	Two (2) weeks Suspension	Dismissal	Not applicable
The commission of any act or offense similar or analogous to any of the foregoing shall be given the corresponding penalty.					
D. OFFENSES AGAINST SECURITY AND PUBLIC ORDER					
Possession and carrying of firearms, explosives and other deadly weapon on Company time and/or premises. (Category C)	One (1) week Suspension	Two (2) weeks Suspension	Dismissal	Not applicable	Not applicable
Commission of a crime within Company time and/or premises. (Category D)	Dismissal	Not applicable	Not applicable	Not applicable	Not applicable
Allowing unauthorized persons within one's work areas loitering and/or having no official business matters to discuss during office hours. (Category A)	Verbal Reprimand	Written Reprimand with Warning	One (1) week Suspension	Two (2) weeks Suspension	Dismissal
Tampering of Company notices and memoranda. (Category D)	Dismissal	Not applicable	Not applicable	Not applicable	Not applicable
Smoking in non-smoking areas at any time while inside Company premises. (Company A)	Verbal Reprimand	Written Reprimand with Warning	One (1) week Suspension	Two (2) weeks Suspension	Dismissal



LIST OF OFFENSES	DEGREE OF OFFENSE				
	First	Second	Third	Fourth	Fifth
Refusal to submit to or failure to meet security requirements of the Company such as but not limited to: wearing of Company-issued ID, inspection by a Company personnel authorized to do such, submit/report to Company authorized personnel in their performance of their duty. (Category A)	Verbal Reprimand	Written Reprimand with Warning	One (1) week Suspension	Two (2) weeks Suspension	Dismissal
The commission of any act or offense similar or analogous to any of the foregoing shall be given the corresponding penalty.					
E. OFFENSES AGAINST PUBLIC MORAL AND DECENCY					
<i>E-1. Alcoholism and drug addiction</i>					
Being drunk or intoxicated and/or disorderly on Company time, premises and/or during Company sponsored activities. (Category C)	One (1) week Suspension	Two (2) weeks Suspension	Dismissal	Not applicable	Not applicable
Reporting for work to any Company executive while under the influence of intoxicating liquor and/or drugs. (Category C)	One (1) week Suspension	Two (2) weeks Suspension	Dismissal	Not applicable	Not applicable
Bringing in, selling, using and/or possessing prohibited drugs in Company premises. (Category D)	Dismissal	Not applicable	Not applicable	Not applicable	Not applicable
The commission of any act or offense similar or analogous to any of the foregoing shall be given the corresponding penalty therefore.					
<i>E-2. Others</i>					
Causing ill-will and/or dissension, forming intrigue among employees (Category A)	Verbal Reprimand	Written Reprimand with Warning	One (1) week Suspension	Two (2) weeks Suspension	Dismissal
Taking part in or abetting any form of gambling in company time and premises. (Category B)	Written Reprimand with Warning	One (1) week Suspension	Two (2) weeks Suspension	Dismissal	Not applicable



LIST OF OFFENSES	DEGREE OF OFFENSE				
	First	Second	Third	Fourth	Fifth
Any direct, confrontational use of abusive, foul, profane or indecent language or any related discourteous or disrespectful acts against one's superior or any Company official at any time on Company premises. (Category D)	Dismissal	Not applicable	Not applicable	Not applicable	Not applicable
Any conduct on Company time or property that violates common decency or morality. (Category D)	Dismissal	Not applicable	Not applicable	Not applicable	Not applicable
The commission of any act or offense similar or analogous to any of the foregoing shall be given the corresponding penalty.					
F. OTHERS					
Refusal to answer questions in any investigation authorized or conducted by the Company, unless such interrogation would violate his constitutional rights. (Category B)	Written Reprimand with Warning	One (1) week Suspension	Two (2) weeks Suspension	Dismissal	Not applicable
Commission of any 5 offenses subject to disciplinary action within a fiscal year in which the penalty involved is at least the minimum of Category A and B. (Category D)	Dismissal	Not applicable	Not applicable	Not applicable	Not applicable
Commission of any 3 offenses subject to disciplinary action within a fiscal year in which the penalty involved is at least the minimum of Category C. (Category D)	Dismissal	Not applicable	Not applicable	Not applicable	Not applicable
The imposition of the above penalties shall be without prejudice to the institution of the appropriate criminal action when and if the same is warranted by the nature of the offense.					



2.5 Disciplinary Actions

2.5.1 Methods of Disciplinary Actions

2.5.1.1 VERBAL REPRIMAND

A verbal notice calling the attention of the person committing an offense and warning him from further committing the same. The person shall also be counseled.

2.5.1.2 WRITTEN REPRIMAND WITH WARNING

A written notice calling the attention of the employee who committed an offense, and warning the person committing the same against repetition of such infraction in the future that will subject him or her to a higher penalty.

2.5.1.3 ONE (1) WEEK SUSPENSION

A physical detachment from service for five (5) working days without salary and benefits, depending on the gravity of the offense or violation.

2.5.1.4 TWO (2) WEEKS SUSPENSION

A physical detachment from service for ten (10) working days without salary and benefits, depending on the gravity of the offense or violation.

2.5.1.5 DISMISSAL

A termination of an employee's services for a cause. A dismissed employee automatically forfeits all benefits that would normally accrue to him on retirement or separation for reasons other than for a cause.



2.5.2 Proceeding and Administration of Disciplinary Actions

2.5.2.1 In case where the respondent occupies the rank of staff with Categories A, B and C offenses, the following proceeding and administration shall apply:

2.5.2.1.1 The disciplinary actions for erring staff members shall be administered by:

Disciplinary Action	Administrator
Verbal Reprimand	Immediate Superior
Written Reprimand with Warning	Immediate Superior in consultation with HR & Administration Head
One (1) week Suspension	Department Head in consultation with HR & Administration Head
Two (2) weeks Suspension	Department Head in consultation with HR & Administration Head
Dismissal	President in consultation with Department Head and HR & Administration Head

2.5.2.1.2 The immediate superior of the offender or, any employee who is aware of the commission of an offense, shall be responsible for reporting the commission of an offense to the Department Head. The report shall be in writing.

2.5.2.1.3 Within five (5) days upon receipt of a written report of an offense, the Department Head, in consultation with HR & Administration Head, shall conduct an initial investigation. The Department Head shall furnish the employee concerned with a written notice or memo to explain reported offense stating particular acts or omissions constituting the grounds for imposition of the corresponding disciplinary action. The employee concerned shall be given five (5) days from receipt of the written notice or memo, to respond.

2.5.2.1.4 The employee concerned shall, within the given time limit, provide his explanation in writing. Failure to file an answer shall be deemed a waiver of the right of the accused to explain and imposition of appropriate disciplinary action shall proceed.



2.5.2.1.5 The HR & Administration Head shall accomplish the disciplinary action memo describing comprehensively the specific circumstances of the offense and stating his recommendation on the disciplinary action to be taken. The following pertinent facts, among others, shall be included in the disciplinary action memo:

- a. Name of the concerned employee
- b. Description of the offense and details such as its nature, rules violated, time and place, name of witnesses, if any and level of offense
- c. Recommended disciplinary action
- d. Incident report, if any

2.5.2.1.6 The Administrator shall advise the employee concerned of the disciplinary action to be imposed by serving a written notice personally with proof of his receipt or by registered mail with return card.

2.5.2.1.7 Copies of the disciplinary action memo shall be distributed as follows:

Copy	Person/Department
Original copy	Employee concerned
One (1) copy	HR & Administration Head (for 201 filing)
One (1) copy	Immediate Superior
One (1) copy	Department Head
One (1) copy	President

2.5.2.2 In case where the respondent occupies the rank of Department Head or higher or rank of staff with Categories D and E offenses, the following proceeding and administration shall apply:

2.5.2.2.1 The disciplinary actions shall be administered by the Discipline, Ethics and Values Committee.

2.5.2.2.2 The immediate superior of the respondent or any employee who has knowledge of the commission by another employee of an offense under the exclusive jurisdiction of the Discipline, Ethics and Values Committee shall, upon discovery thereof, shall report the same in writing to the HR & Administration Head. The superior or employee concerned who, despite the knowledge of the commission by another employee of an offense, fails to report the same shall likewise be charged administratively and imposed appropriate disciplinary actions.

2.5.2.2.3 Within five (5) days from receipt of the report, Internal Audit shall begin investigation of the case. Within 30 days there from, Internal Audit shall decide on whether to elevate or not to the Discipline, Ethics and Values Committee. It may, at any time, have to preventively suspend or re-assign the employee suspected of committing an offense if his/her presence in the workplace would pose a risk to the life or properties of his co-employees or to the properties and records of the Company.

2.5.2.2.4 Within (5) days from receipt of the report from Internal Audit recommending the institution of a disciplinary proceeding, the Discipline, Ethics and Values Committee shall furnish the respondent with a written notice or memo to explain reported offense stating particular acts or omissions constituting the grounds for imposition of the corresponding disciplinary action inclusive of a request to answer within five (5) days from receipt of written notice or memo to explain.

2.5.2.2.5 The employee concerned shall, within the given time limit, provide his explanation in writing. Failure to file an answer shall be deemed a waiver of the right of the accused to explain and imposition of appropriate disciplinary action shall proceed.

2.5.2.2.6 If the respondent admits his culpability to an offense, the Discipline, Ethics and Values Committee shall prepare a report of such admission. The report shall be submitted to



the President, who shall be responsible for imposing the disciplinary action prescribed by this Code and for ordering restitution of a thing lost, damaged or destroyed in warranted cases, in consultation with the Legal & Compliance Head.

- 2.5.2.2.7 If the respondent does not admit culpability, the Discipline, Ethics and Values Committee shall conduct a formal hearing. The respondent shall be given the opportunity to be heard in person or through counsel after due notice to him served personally or by registered mail/courier at his address listed in the personal records. After the hearing, the Discipline, Ethics and Values Committee's findings and recommendations shall be forwarded to the President who shall take the necessary and appropriate actions thereon.
- 2.5.2.2.8 In case the respondent fails to appear at the formal hearing despite due notice, such failure shall constitute a waiver on the part of the respondent to be present thereon, and the Discipline, Ethics and Values Committee shall proceed with the hearing in his/her absence.
- 2.5.2.2.9 The Discipline, Ethics and Values Committee shall endeavor to complete the formal hearing and to render its decision within a period of 60 days from the date of receipt of report from Internal Audit. A copy of the Discipline, Ethics and Values Committee's decision shall be served on the respondent. The President shall be notified of the decision prior to its implementation.
- 2.5.2.2.10 The respondent may file a written request for a review or reconsideration of the Discipline, Ethics and Values Committee's decision within five (5) working days from receipt of such decision. Otherwise, the same shall be deemed final and executory. The decision on the respondent's written request for review or reconsideration shall be final.
- 2.5.2.2.11 Any modification of the Discipline, Ethics and Values Committee's decision shall be properly documented.
- 2.5.2.2.12 The President may, upon appeal and acknowledgement of guilt by respondent, exercise his power to grant clemency by modifying, amending or mitigating the disciplinary action imposed upon the respondent by the Discipline, Ethics and Values Committee. Such clemency shall not be considered as overturning, reversing or nullifying the decision of the Discipline, Ethics and Values Committee.



3.2 Selection

3.2.1 Purpose

The purpose of this policy is to provide a framework to ensure a proper selection process for the Company. This process encompasses activities that will evaluate the pool of applicants to discern if their abilities and qualifications are fit for the job and to ascertain if they possess values that are fit with the Company's culture. The objective is to narrow down the pool, to rank the top applicants, and to identify the sole applicant best suited to fill the job vacancy.

3.2.2 Policies

- 3.2.2.1 The Company shall observe equal employment opportunities. There shall be no discrimination on the grounds of sex, nationality, race, physical condition, marital status, family status, and religion unless these will hinder the candidate to carry out normal job duties.
- 3.2.2.2 All applicants shall accomplish the Application Declared Information form as requested.
- 3.2.2.3 At a minimum, candidates for a staff position shall undergo three (3) interviews, which are:
 - 3.2.2.3.1 Preliminary interview with HR & Administration Head
 - 3.2.2.3.2 Second interview with Hiring Manager
 - 3.2.2.3.3 Final interview with the President
- 3.2.2.4 Candidates for a Senior Officer position shall only undergo an interview with the President.
- 3.2.2.5 The HR & Administration Head shall conduct the interview guided by the Competency-based questionnaire. The interview shall be further documented through the Interview Rating Sheet.
- 3.2.2.6 The selection of the best candidate shall be participated by the President, Hiring Manager and HR & Administration Head.
- 3.2.2.7 Regardless of sourcing method used, all applicants shall undergo the same selection process.
- 3.2.2.8 Unsuccessful candidates shall be notified in person or thru e-mail as the Company's sign of courtesy.



POLICY ON DRUG-FREE WORKPLACE

GT Capital Holdings, Inc. explicitly prohibits:

1. The use, possession, solicitation for, or sale of dangerous drugs on company premises or while performing an assignment.
2. Being impaired or under the influence of dangerous drugs away from the company, if such impairment or influence adversely affects the employee's work performance, the safety of the employee or of others, or puts at risk the company's reputation.
3. Possession, use, solicitation for, or sale of dangerous drugs away from the company premises, if such activity or involvement adversely affects the employee's work performance, the safety of the employee or of others, or puts at risk the company's reputation.
4. The presence of any detectable amount of dangerous drugs in the employee's system while at work, while on the premises of the company, or while on company business. "Dangerous Drugs" include those listed in the Schedules annexed to the 1961 Single Convention on Narcotic Drugs, as amended by the 1972 Protocol, and in the Schedules annexed to the 1971 Single Convention on Psychotropic Substances as enumerated in the attached annex of R.A. 9165.

A. MANDATORY DRUG TEST

1. To ensure that only those qualified shall be screened and recruited to prevent the detrimental effects (*e.g. lower productivity; poor decision making; increased accidents; more compensation claims; and reduced team effort*) which drug use and abuse may cause in the workplace, the conduct of mandatory drug test shall be required for pre-employment.
2. The Company designates a duly accredited drug-testing center by the Department of Health (DOH), as its authorized drug testing laboratory.
3. The Company may also conduct drug testing under any of the following circumstances:
 - i. **RANDOM TESTING:** Officer/employees may be selected at random for drug testing at any interval determined by the Company.
 - ii. **FOR-CAUSE TESTING:** The company may ask an officer/employee to submit to a drug test at any time it feels that the employee may be under the influence of drugs, including, but not limited to, the following circumstances: evidence of drugs on or about the employee's person or in the employee's vicinity, unusual conduct on the employee's part that suggests impairment



or influence of drugs, negative performance patterns, or excessive and unexplained absenteeism or tardiness.

iii. **POST-ACCIDENT TESTING:** Any officer/employee involved in a “Near-Miss” incident or “Work Accident” under circumstances that suggest possible use or influence of drugs may be asked to submit to a drug test. As defined herein, “Near-Miss” means an incident arising from or in the course of work which could have led to injuries or fatalities of the workers and/or considerable damage to the employer had it not been curtailed. “Work Accident” refers to unplanned or unexpected occurrence that may or may not result in personal injury, property damage, work stoppage or interference or any combination thereof of which arises out of and in the course of employment.

4. All drug tests shall employ, among others, two (2) testing methods, the screening test which will determine the positive result as well as the type of the drug used and the confirmatory test which will confirm a positive screening test. Where the confirmatory test turns positive, the company’s Assessment Team shall evaluate the results and determine the level of care and administrative interventions that can be extended to the concerned employee.
5. The Company shall inform the officer/employee who was subjected to a drug test of the test-results whether positive or negative.
6. All costs of drug testing shall be borne by the Company.

B. TREATMENT, REHABILITATION, AND REFERRAL

1. An officer/employee who, for the first time, is found positive of drug use, shall be referred for treatment and/or rehabilitation in a DOH accredited center. For this purpose, the Company shall provide a list of at least three (3) accredited facilities which an employee who was tested positive for drugs may choose from.
2. Following rehabilitation, the company’s Assessment Team, in consultation with the head of the rehabilitation center, shall evaluate the status of the drug dependent employee and recommend to the employer the resumption of the employee’s job if he/she poses no serious danger to his/her co-employees and/or the workplace.
3. All costs for the treatment and rehabilitation of the drug dependent employee shall be charged to his account. The period during which the employee is under treatment or rehabilitation shall be considered as authorized leaves.
4. Repeated drug use even after ample opportunity for treatment and rehabilitation shall be dealt with the corresponding penalties under R.A. 9165 and is a ground for dismissal.



C. ADVOCACY, EDUCATION AND TRAINING

1. GT Capital Holdings, Inc. undertakes to increase the awareness and education of its officers and employees on the adverse effects of dangerous drugs through continuous advocacy, education and training programs/activities to all its officers and employees.
2. All officers and employees are required to undergo an orientation/education program before assumption of their respective duties. The program shall include the following topics:
 - i. Salient features of R.A. 9165;
 - ii. Adverse effects of abuse and/or misuse of dangerous drugs on the person, workplace, family and the community;
 - iii. Preventive measures against drug abuse; and
 - iv. Steps to take when intervention is needed, as well as available services for treatment and rehabilitation.
3. To encourage all officers and employees to lead a healthy lifestyle while at work and at home, GTCap undertakes to conduct the following activities as often as possible:
 - i. Lifestyle assessment programs on health nutrition, weight management, stress management, alcohol abuse, smoking cessation, and other indicators of risk diseases;
 - ii. Health wellness screenings (*e.g. blood pressure and heart rate, cholesterol test, blood glucose, etc.*);
 - iii. Sports, recreational and fun-game activities; and
 - iv. Other activities promoting health and wellness.

D. ROLES, RIGHTS AND RESPONSIBILITIES OF EMPLOYER AND EMPLOYEES

1. GTCap shall ensure that the workplace policies and programs on the prevention and control of dangerous drugs, including drug testing, shall be disseminated to all officers and employees. The employer shall obtain a written acknowledgement from the employees that the policy has been read and understood by them.
2. GTCap shall maintain the confidentiality of all information relating to drug tests or to the identification of drug users in the workplace; exceptions may be made only where required by law, in case of overriding public health and safety concerns; or where such exceptions have been authorized in writing by the person concerned.
3. All officers and employees shall enjoy the right to due process, absence of which will render the referral procedure ineffective.



E. CONSEQUENCES OF POLICY VIOLATIONS

1. Any officer or employee who uses, possesses, distributes, sells or attempts to sell, tolerates, or transfers dangerous drugs or otherwise commits other unlawful acts as defined under Article II of RA 9165 and its Implementing Rules and Regulations shall be subject to the pertinent provisions of the said Act.
2. Any officer or employee found positive for use of dangerous drugs shall be dealt with administratively in accordance with the provisions of Article 282 of Book VI of the Labor Code and under RA 9165.

F. MONITORING AND EVALUATION

The implementation of these policies and programs shall be monitored and evaluated periodically by management to ensure a drug-free workplace. For this purpose, an Assessment Team shall be constituted in accordance with D.O. 53-03.



HEPATITIS B WORKPLACE POLICY AND PROGRAM

I. Implementing Structure

The GT Capital Holdings, Inc.'s (GTCap) Hepatitis B workplace policy and program shall be managed by its health and safety committee. Each department shall be duly represented.

II. Guidelines

Education

1. Coverage. All employees regardless of employment status may avail of hepatitis B education services for free;
2. Hepatitis B shall be conducted through distribution and posting of IEC materials and counselling and/ or lectures; and
3. Hepatitis B education shall be spearheaded by the Company's Medical Clinic in close coordination with the health and safety committee.

Preventive Strategies

1. All employees are encouraged to be immunized against Hepatitis B after securing clearance from their physician.
2. Workplace sanitation and proper waste management and disposal shall be monitored by the health and safety committee on a regular basis.
3. Personal protective equipment shall be made available at all times for all employees; and
4. Employees will be given training and information on adherence to standards or universal precautions in the workplace.

III. Social Policy

Non-discriminatory Policy and Practices

1. There shall be no discrimination of any form against employees on the basis of their Hepatitis B status consistent with the international agreements on non discrimination ratified by the Philippines (ILO C111). Employees shall not be discriminated against, from pre to post employment, including hiring, promotion, or assignment because of their hepatitis B status.
2. Workplace management of sick employees shall not differ from that of any other illness. Persons with Hepatitis B related illnesses may work for as long as they are medically fit to work.

Confidentiality



Job applicants and employees shall not be compelled to disclose their Hepatitis B status and other related medical information. Co-employees shall not be obliged to reveal any personal information about their fellow employees. Access to personal data relating to employee's Hepatitis B status shall be bound by the rules on confidentiality and shall be strictly limited to medical personnel or if legally required.

Work-Accommodation and Arrangement

1. GTCap shall take measures to reasonably accommodate employees who are Hepatitis B positive or with Hepatitis B - related illnesses.
2. Through agreements made between management and employees' representative, measures to support employees with Hepatitis B are encouraged to work through flexible leave arrangements, rescheduling of working time and arrangement for return to work.

Screening, Diagnosis, Treatment and Referral to Health Care Services

1. GTCap shall establish a referral system and provide access to diagnostic and treatment services for its employees for appropriate medical evaluation/monitoring and management.
2. Adherence to the guidelines for healthcare providers on the evaluation of Hepatitis B positive employees is highly encouraged.
3. Screening for Hepatitis B as a prerequisite to employment shall not be mandatory.

Compensation

GTCap shall provide access to Social Security System and Employees Compensation benefits under PD 626 to an employee contracted with Hepatitis B infection in the performance of his duty.

IV. Roles and Responsibilities of Employers and Employees

Employer's Responsibilities

1. Management, together with employees' organizations, company focal personnel for human resources, and safety and health personnel shall develop, implement, monitor and evaluate the workplace policy and program on Hepatitis B.
2. The Health and Safety Committee shall ensure that their company policy and program is adequately funded and made known to all employees.
3. The Human Resources and Administration Department shall ensure that their policy and program adheres to existing legislations and guidelines, including provisions on leaves, benefits and insurance.
4. Management shall provide information, education and training on Hepatitis B for its workforce consistent with the standardized basic information package developed by the Hepatitis B TWG; if not available within the establishment, then provide access to information.



5. GTCap shall ensure non-discriminatory practices in the workplace.
6. The management together with the company focal personnel for human resources and safety and health shall provide appropriate personal protective equipment to prevent Hepatitis B exposure, especially for employees exposed to potentially contaminated blood or body fluid.
7. The Health and Safety Committee, together with the employees' organizations shall jointly review the policy and program for effectiveness and continue to improve these by networking with government and organizations promoting Hepatitis B prevention.
8. GTCap shall ensure confidentiality of the health status of its employees, including those with Hepatitis B.
9. Human Resources and Administration shall ensure that access to medical records is limited to authorized personnel.

Employees Responsibilities

1. The employees' organization is required to undertake an active role in educating and training their members on Hepatitis B prevention and control. The IEC program must also aim at promoting and practicing a healthy lifestyle with emphasis on avoiding high-risk behavior and other risk factors that expose employees to increased risk of Hepatitis B infection, consistent with the standardized basic information package developed by the Hepatitis B TWG.
2. Employees shall practice non-discriminatory acts against co-employees on the ground of Hepatitis B status.
3. Employees and their organizations shall not have access to personnel data relating to an employee's Hepatitis B status. The rules of confidentiality shall apply in carrying out union and organization functions.
4. Employees shall comply with the universal precaution and the preventive measures.
5. Employees with Hepatitis B may inform the health care provider or the company physician on their Hepatitis B status, that is, if their work activities may increase the risk of Hepatitis B infection and transmission or put the Hepatitis B positive at risk for aggravation.



HIV/AIDS WORKPLACE POLICY AND PROGRAM

In conformity with Republic Act No. 8504 otherwise known as the Philippine AIDS Prevention and Control Act of 1998 which recognizes workplace-based programs as a potent tool in addressing HIV/AIDS as an international pandemic problem, this company policy is hereby issued for the information and guidance of the employees in the diagnosis, treatment and prevention of HIV/AIDS in the workplace.

This policy is also aimed at addressing the stigma attached to HIV/AIDS and ensures that the workers' right against discrimination and confidentiality is maintained.

I. IMPLEMENTING STRUCTURE

The GT Capital Holdings, Inc. (GTCap) HIV/AIDS Program shall be managed by its Health and Safety Committee consists of representatives from the different departments.

II. BASIC INFORMATION ON HIV/AIDS

What is HIV/AIDS?

It is a disease caused by a virus called HIV (Human Immunodeficiency Virus). This virus slowly weakens a person's ability to fight off other diseases by attaching itself to and destroying important cells that control and support the human immune system.

How HIV/AIDS is transmitted?

- Unprotected sex with an HIV infected person;
- From an infected mother to her child (during pregnancy, at birth through breast feeding);
- Intravenous drug use with contaminated needles;
- Transfusion with infected blood and blood products; and
- Unsafe, unprotected contact with infected blood and bleeding wounds of an infected person.

Is there a cure?

No. However, there are antiretroviral drug combinations that are available when properly used, result in prolonged survival of people with HIV. Holistic care of people living with HIV-AIDS and comprehensive treatment of opportunistic infections also dramatically improve quality of life.



III. COVERAGE

This Program shall apply to all employees regardless of their employment status.

IV. GUIDELINES

A. Preventive Strategies

1. Conduct of HIV-AIDS Education.-

a. Who will conduct?

The Manila Doctors Hospital in coordination with the Health and Safety Committee shall conduct HIV-AIDS education to all employees for free. This shall also form part of the orientation of newly hired employees. The standardized information package developed by the Department of Labor and Employment (DOLE) may be used for this purpose.

b. How will it be conducted?

The HIV-AIDS education will be conducted through distribution and posting of IEC materials, lectures, counselling and training and information on adherence to standard or universal precautions in the workplace

2. Screening, Diagnosis, Treatment and Referral to Health Care Services

a. Screening for HIV as a prerequisite to employment is not mandatory.

b. GTCap shall encourage positive health seeking behavior through Voluntary Counseling and Testing.

c. GTCap shall establish a referral system and provide access to diagnostic and treatment services for its workers. Referral to Social Hygiene Clinics of LGU for HIV screening shall be facilitated by the company's medical clinic staff.

d. GTCap shall likewise facilitate access to livelihood assistance for the affected employee and his/her families, being offered by other government agencies.

B. SOCIAL POLICY

1. Non-discriminatory Policy and Practices

a. Discrimination in any form from pre-employment to post-employment, including hiring, promotion or assignment, termination of employment based on the actual, perceived or suspected HIV status of an individual is prohibited.

b. Workplace management of sick employees shall not differ from that of any other illness.



- c. Discriminatory act done by an officer or an employee against their co-officer or co-employee shall likewise be penalized.

2. Confidentiality/Non-Disclosure Policy

- a. Access to personal data relating to a worker's HIV status shall be bound by the rules of confidentiality consistent with provisions of R.A. 8504 and the ILO Code of Practice.
- b. Job applicants and workers shall not be compelled to disclose their HIV/ AIDS status and other related medical information.
- c. Co-employees shall not be obliged to reveal any personal information relating to the HIV/AIDS status of fellow workers.

3. Work-Accommodation and Arrangement

- e. GTCap shall take measures to reasonably accommodate employees with AIDS-related illnesses.
- f. Agreements made between the company and employee's representatives shall reflect measures that will support workers with HIV/AIDS through flexible leave arrangements, rescheduling of working time and arrangement for return to work.

IV. ROLES AND RESPONSIBILITIES OF EMPLOYERS AND EMPLOYEES

A. Employer's Responsibilities

1. GTCap, together with employees/ labor organizations, company focal personnel for human resources, safety and health personnel shall develop, implement, monitor and evaluate the workplace policy and program on HIV/AIDS.
2. Provide information, education and training on HIV/AIDS for its workforce.
3. Ensure non-discriminatory practices in the workplace and that the policy and program adheres to existing legislations and guidelines .
4. Ensure confidentiality of the health status of its employees and the access to medical records is limited to authorized personnel.
5. GTCap, through its Human Resources and Administration Department, shall see to it that their company policy and program is adequately funded and made known to all employees.
6. The Health and Safety Committee, together with employees/ labor organizations shall jointly review the policy and program and continue to improve these by networking with government and organizations promoting HIV prevention.

B. Employees' Responsibilities

1. The employee's organization shall undertake an active role in educating and training their members on HIV prevention and control. Promote and practice a



healthy lifestyle with emphasis on avoiding high risk behavior and other risk factors that expose workers to increased risk of HIV infection.

2. Employees shall practice non-discriminatory acts against co-employees.
3. Employees and their organization shall not have access to personnel data relating to a worker's HIV status.
4. Employees shall comply with universal precaution and preventive measures.



POLICY AGAINST SEXUAL HARASSMENT

GT Capital Holdings, Inc (GTCap) believes that employees should be afforded the opportunity to work in an environment free of sexual harassment. Sexual harassment is a form of misconduct that undermines the employment relationship. No employee, either male or female, should be subjected verbally or physically to unsolicited and unwelcome sexual overtures or conduct.

Sexual harassment refers to behavior that is not welcome, that is personally offensive, debilitates morale and, therefore, interferes with work effectiveness. Such behavior may be in the form of unwanted physical, verbal or visual sexual advances, requests for sexual favors, and other sexually oriented conduct which is offensive or objectionable to the recipient, including, but not limited to: epithets, derogatory or suggestive comments, slurs or gestures and offensive posters, cartoons, pictures, or drawings.

GTCap will not tolerate any behavior that amounts to sexual harassment and any officer or employee found to have committed sexual harassment shall be subjected to disciplinary action, up to and including dismissal.

A. DEFINITION OF SEXUAL HARASSMENT

GTCap has adopted, and its policy is based on, the definition of sexual harassment set forth in Section 3 of R.A. 7877. It provides that sexual harassment in workplace is committed by an employer, employee, manager, supervisor, agent of the employer, or any other person who, having authority, influence or moral ascendancy over another in a work environment, demands, requires or otherwise requires any sexual favor from the other, regardless of whether the demand, requests or requirement for submission is accepted by the object of said Act.

In a work-related or employment environment, sexual harassment is committed when:

1. The sexual favor is made as a condition in the hiring or in the employment, re-employment, or continued employment of said individual, or in granting said individual favorable compensation, terms of conditions, promotions, or privileges; or the refusal to grant the sexual favor results in limiting, segregating or classifying the employee which in any way would discriminate, deprive or diminish employment opportunities or otherwise adversely affect said employee;
2. the above acts would impair the employees' rights or privileges under existing labor laws; or
3. the above acts would result in an intimidating, hostile, or offensive environment for the employee.

B. WHERE SEXUAL HARASSMENT IS COMMITTED

Sexual harassment may be committed in any work or training environment. It may include, but are not limited to the following:

1. In or outside the office building or training site;



2. at office or training-related social functions;
3. in the course of work assignments outside the office;
4. at work-related conferences, studies or training sessions; or
5. during work related travel.

C. FORMS OF SEXUAL HARASSMENT

Sexual harassment may be committed in any of the following forms:

1. Overt sexual advances;
2. Unwelcome or improper gestures of affection;
3. Request or demand for sexual favors including but not limited to going out on dates, outings, or the like for the same purpose;
4. Any other act or conduct of a sexual nature or for purposes of sexual gratification which is generally annoying, disgusting or offensive to the victim.

D. WHAT IS NOT SEXUAL HARASSMENT

Sexual harassment does not refer to occasional compliments of a socially acceptable nature. It refers to behavior that is not welcome, that is personally offensive, that debilitates morale, and that, therefore, interferes with work effectiveness.

E. EMPLOYER'S RESPONSIBILITY

GTCap undertakes to provide its officers and employees a work environment free of sexual harassment by management personnel, by co-workers and by others with whom officers and employees must interact in the course of their employment in GTCap. Sexual harassment is specifically prohibited as unlawful and as a violation of GTCap's policy. GTCap is responsible for preventing sexual harassment in the workplace, for taking immediate corrective action to stop sexual harassment in the workplace and for promptly investigating any allegation of work-related sexual harassment.

II. PROCEDURES ON SEXUAL HARASSMENT CASES

A. COMPLAINT PROCEDURE

Any officer or employee, who experiences or witnesses any act of sexual harassment in the workplace, shall report the same immediately to the Discipline, Ethics and Values Committee. They may also report acts of sexual harassment to any other member of GTCap's management or ownership. All allegations of sexual harassment will be quickly investigated. To the extent possible, the identity of the officer or employee shall remain confidential and that of any witnesses and the alleged harasser will be protected against unnecessary disclosure. When the investigation is completed, all parties will be informed of the outcome of the investigation.

Discipline, Ethics and Values Committee shall be constituted and shall be composed of the management and the employees' representative to receive complaints, investigate and hear sexual harassment cases. The Committee shall develop its own rules in the settlement and disposition of sexual harassment cases. The Committee shall also develop and implement programs to increase understanding and awareness about sexual harassment.



B. RETALIATION

GTCap will permit no employment-based retaliation against anyone who brings a complaint of sexual harassment or who speaks as a witness in the investigation of a complaint of sexual harassment.

C. WRITTEN POLICY

All officers and employees of GTCap shall receive a copy of sexual harassment policy upon assumption of their respective offices. If at any time an officer or employee would like another copy of the policy, please contact the Discipline, Ethics and Values Committee. If GTCap should amend or modify its sexual harassment policy, all officers and employees will receive an individual copy of the amended or modified policy.

Workplace Policy and Program on Tuberculosis (TB) Prevention and Control

GT Capital Holdings, INC. (GTCap) recognizes that while 80% of Tuberculosis (TB) cases belong to the economically productive individuals, it is also treatable and its spread can be curtailed if proper control measures will be implemented. As such, this TB Policy and Program is hereby issued for the information and guidance of the employees.

Implementing Structure

GTCap's TB Prevention and Control Program shall be managed by its Health and Safety Committee consists of representatives from the different departments.

Purpose

To address the stigma attached to TB and to ensure that the worker's right against discrimination, brought by the disease, is protected.

To facilitate free access to anti-TB medicines of affected employees through referrals.

Coverage

This Program shall apply to all employees regardless of their employment status.

Guidelines – Preventive Strategies

1. Conduct of Tuberculosis (TB) Advocacy, Training and Education
 - a. TB education shall be conducted by the Company's accredited medical clinic in close coordination with the Health and Safety Committee, through distribution and posting of materials and counselling and/ or lectures.
 - b. Engineering measures such as improvement of ventilation, provision for adequate sanitary facilities and observance of standard for space requirement (avoidance of overcrowding) shall be implemented.
2. Screening, Diagnosis, Treatment and Referral to Health Care Services
 - a. GTCap shall establish a referral system and provide access to diagnostic and treatment services for its employees. GTCap shall make arrangements with the nearest Direct Observed Treatment (DOT) facility.
 - b. GTCap's adherence to the DOTS guidelines on the diagnosis and treatment is highly encouraged.

Medical Management

1. GTCap shall adopt the DOTS strategy in the management of workers with tuberculosis. TB case finding, case holding and reporting and recording shall be in accordance with the Comprehensive Unified Policy (CUP) and the National Tuberculosis Control Program.
2. GTCap shall at the minimum refer employees and their family members with TB to private or public DOTS centers.



Social Policy

1. Non-discriminatory Policy and Practices

- a. There shall be no discrimination of any form against employees from pre- to post-employment, including hiring, promotion, or assignment, on account of their TB status.
- b. Workplace management of sick employees shall not differ from that of any other illness. Persons with TB-related illnesses should be able to work for as long as they are medically fit.

2. Work-Accommodation and Arrangement

- a. Agreements made between the company and employee's representatives shall reflect measures that will support workers with TB through flexible leave arrangements, rescheduling of working time and arrangement for return to work.
- b. The employee may be allowed to return to work with reasonable working arrangements as determined by the Company Health Care provider and/or the DOTS provider.

Compensation

GTCap shall provide access to Social Security System and Employees Compensation benefits under PD 626 to an employee who acquired TB infection in the performance of his/her duty.

Roles and Responsibilities of Employers and Employees

1. Employer's Responsibilities

- a. GTCap, together with workers/ labor organizations, company focal personnel for human resources, safety and health personnel shall develop, implement, monitor and evaluate the workplace policy and program on TB.
- b. Provide information, education and training on TB prevention for its workforce.
- c. Ensure non-discriminatory practices in the workplace.
- d. Ensure confidentiality of the health status of its employees and the access to medical records is limited to authorized personnel.
- e. GTCap, through its Human Resources and Administration Department, shall see to it that their company policy and program is adequately funded and made known to all employees.
- f. The Health and Safety Committee, together with employees/ labor organizations shall jointly review the policy and program and continue to improve these by networking with government and organizations promoting TB prevention.



2. Employees' Responsibilities

- a. The employee's organization is required to undertake an active role in educating and training their members on TB prevention and control.
- b. Employees shall practice non-discriminatory acts against co-workers.
- c. Employees and their organization shall not have access to personnel data relating to a worker's TB status.
- d. Employees shall comply with universal precaution and the preventive measures.

Implementation and Monitoring

The Safety and Health Committee or its counterpart shall periodically monitor and evaluate the implementation of this Policy and Program.



CODE OF CONDUCT ACKNOWLEDGMENT FORM

This is to acknowledge receipt of a copy of the Employee Handbook. I certify that I have read and fully understand its contents, and I agree to comply with the standards contained herein. Further, I understand that any breach of existing Company policies and procedures can result in disciplinary action, up to and including termination and/or removal from employment.

Signature Over Printed Name

Date

(EMPLOYEE'S COPY)

CODE OF CONDUCT ACKNOWLEDGMENT FORM

This is to acknowledge receipt of a copy of the Employee Handbook. I certify that I have read and fully understand its contents, and I agree to comply with the standards contained herein. Further, I understand that any breach of existing Company policies and procedures can result in disciplinary action, up to and including termination and/or removal from employment.

Signature Over Printed Name

Date

(HRAD'S COPY)