



## **Eagle Cement Corporation**

### **Code of Ethics**



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We warmly welcome you here in Eagle Cement Corporation (ECC, the Company)!

Your first few weeks will definitely be a period of adjustment. To help you manage this transition, this Employee Handbook (the Handbook) will serve as a guide to help you find answers to most commonly asked questions about ECC's organization. We intend to keep you, as part of the family, informed on ECC's work practices and benefits.

The Company reserves the right to amend any of the provisions and conditions contained in this Handbook without previous notification.

This Handbook is the property of ECC and must be surrendered as part of ECC's clearance procedures upon resignation or termination from employment.

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The Company believes that its employees are its most valuable resource and key competitive advantage. It is the Company's philosophy that its greatest strength has always been the energy, adaptability, innovativeness, and compassion of its employees in facing the challenges of a rapidly changing and increasingly competitive environment.

The Company likewise believes that its employees are its most important business partners. As such, the Company is committed to create an environment that promotes holistic development of the employees, meets their individual needs, respects their individuality and enables them to meet their full potential.

In turn, the Company engenders commitment and a deep sense of personal accountability from each employee to the Company's purpose, values, and principles.

### **Values**

The Company's values are the foundation for sustaining its business environment. They are:

- DISCIPLINE** Observes and complies with the Company's rules and regulations. Manages one's self without need for supervision. Abides by legal and statutory requirements without expecting rewards.

**INTEGRITY** Takes ownership of shortcomings and exerts all means to correct them. He/she is also brave and opens enough to hold others accountable all the time. Is truthful and acts in good faith. Values and acts for the Company's best interests as if he/she is an owner thereof.

**RESPECT FOR PEOPLE** Communicates with others using proper/polite words, tone, and mind set. Encourages others to express their thoughts, ideas, and feelings. Provides time to listen to others' concerns. Gives honest and helpful feedback, cultivating an environment where employees learn and grow.

**EXCELLENCE** Works smart and has a passion for innovation. Initiates continuous improvement in every aspect of his/ her work - believing that there is always a better way. A great leader whatever his/her position is. Being assertive and able to balance different work situations.

**CUSTOMER FOCUS** Treats all employees with respect and dignity regardless of position. Willing to help others. Handles well customer concerns - internal and external - with urgency and awareness regardless of position.

**TEAM WORK** Bringing together knowledge, experience and skills to achieve the common goals with other team members. Sharing expertise with one another. A team player, cooperative of company activities and other division's goals. Place professionalism above any personal issues with others.

These values define who the Company is and all its employees— to each other, to its

customers, suppliers and shareholders. They define what the Company and its employees stand for, and they are guiding principles for proper and ethical behavior.

**I. EMPLOYMENT POLICIES**

**A. RECRUITMENT AND HIRING**

ECC believes in choosing the right persons for the right job. It is in the best interest of both the Company and the employee to ensure the appropriateness of assignments based on qualifications and need. This principle is contained in the different activities comprising the Recruitment and Hiring processes.

**General Rule**

The Company seeks to employ persons of good moral character and capable of performing the work functions specified for in the position being applied for, regardless of race, sex, religion and/or political beliefs.

The applicant must meet below listed standard requirements to qualify for employment in the Company.

- Age – The applicant must meet the desired age according to position being applied for as stated in the Personnel Requisition form.

- Education - The applicant must have completed an educational degree which has reference to and relevant to the position being applied for.
- Work Experience – The applicant's work experience similar to and related to the job functions being applied for are required.
- Health - The applicant must be in good physical and mental health to ensure that he/she can fully work and perform the job functions.

### **Assessment, Selection, and Placement**

Candidates for employment in ECC undergo a series of assessment tests to determine the match between the candidate's knowledge, skills, values, and attitudes with the desired profile for the candidate's target position. The profile is contained in the standard position description which consists of the position's roles, activities, educational or experience requirements, competencies and attitudes.

The selection process is not the sole responsibility of the Human Resources Department (HRD). The primary and final responsibility for acceptance or rejection of applicants rests on the requisitioning unit – the manager or supervisor whose unit requires the services of the candidate. In addition to the above considerations, a manager must assess the candidate's potential to assume bigger responsibilities.

### **I. All applicants must pass and meet the following standards of selection:**

#### **1. Written and Oral Examinations**

An applicant must undergo and pass oral and written examinations to evaluate his/her skills and knowledge required for the work function and to ascertain the person's mental fitness.

#### **2. Series of Interviews**

An applicant must undergo and pass a series of preliminary screening and interviews by the Company's designated representative/s to ensure that the best qualified applicant is considered for selection and hiring.

#### **3. Background Check**

At the discretion of the Company, background checks of the applicant may be conducted through means that are legal and through accepted industry practices; e.g. interview of previous superiors/employers and references, record from last school attended and/or testimonies from colleagues/ friends etc.

#### **4. Medical Examination**

All prospective employees shall undergo pre-employment Physical Medical Examination to ensure the physical fitness of

the employee. The medical examinations shall be done by the Company's accredited health care provider. The result of this physical examination shall be one of the considerations for hiring the employee.

#### 5. Job Offer

Upon getting the result of the background investigation, and IF NO negative feedback was encountered, HRD shall prepare the job offer to the prospective candidate. This job offer shall be signed by the authorized signatory/signatories of the Company.

#### 6. Submission of Pre-Employment Requirements:

Candidates are required to submit a uniform set of pre-employment documents:

- SSS Number
- Tax Identification Number
- HDMF/Philhealth Number
- Birth Certificate as well as that of his/her dependents
- Certificate of Employment
- Clearance from Previous Employer
- Transcript of Records or Certified True Copy of Grades
- Diploma or Certificate of Graduation
- Marriage Contract (if applicable)
- NBI Clearance (current year)
- 2x2 and 1x1 pictures (3pcs each) with white background

- Copy of 2316
- Medical Certificate with recommendation of Fitness to Work.

Selected candidates who obtain a job offer are scheduled for the Employee Orientation Program. The purpose and design of this program is to induct, orient, and integrate the new employee into his/her new job, work unit, and the Company. It also serves to introduce the employee to the Company's Human Resources (HR) policies.

The program is essentially designed to achieve two (2) things:

- Enhance the employee's job effectiveness, and;
- Provide information on the Company's organization policies and procedures.

#### B. WORKING CONDITIONS AND HOURS

##### A. Working Days and Hours of Work

1. The Company adopts a six (6)-day workweek with official workdays from Monday to Saturday. The Company shall schedule one (1) day for employees' rest day or day off.
2. The official Company office hour varies in the schedule stated below:  
Plant Based: **Monday to Sunday (Operations)**  
1<sup>st</sup> Shift: 12:00a.m.-8:00a.m.  
2<sup>nd</sup> Shift: 8:00a.m.-4:00 p.m.  
3<sup>rd</sup> Shift: 4:00p.m.-12:00a.m.

**Monday to Friday (Operations Support Group)/Superintendent & Managers**

8:00a.m. -5:00p.m.

**Saturday**

8:00a.m.-12:00nn

Head Office: **Monday to Friday**

9:00 a.m. -6:00 p.m.

**Saturday**

8:00 a.m. to 12:00 p.m.

**The Company reserves the right to change the foregoing schedules should such change/s be necessary to adapt to business operations and market situations and such change/s is/are not contrary to existing laws, rules and regulations.**

**B. Attendance**

7. Every employee must report to work in accordance with his/her approved official work shift or official work week/working hours.
8. Every employee reporting for work must manifest his/her time of arrival and departure from the office by logging in/logging out through the Company's computerized log in/log out recording system. In cases of malfunction of such recording system, the same procedure shall BE DONE manually through the Company's attendance logbook specially prepared for these situations.
9. Absence of log in/log out record shall be construed as absence for the day, unless proven otherwise by the employee through official logbook records.

10. During instances of official business trips, the employee may not be able to report to the office before the trip starts and, therefore, the employee is unable to perform the log in or log out procedures. In these instances, the employee must file and obtain prior approval from his/her immediate superior by accomplishing a corresponding Official Business (OB) Form to validate and record his/her whereabouts or clients visited.
11. Obtain two (2) copies of the OB form to be accomplished and forwarded to HRD which shall record the same. One copy of the OB form shall be returned to the employee.

**Timekeeping**

All employees regardless of status and level are required to register their time in and time out at the computerized timekeeping machine. Employees must always come to work prepared. Corresponding sanctions will be imposed on those who habitually forget to log in and out their official time.

**Tardiness**

- An employee who reports for work beyond the official starting time of the working hour shall be considered tardy. The number of lost working hours due to tardiness cannot be compensated by working beyond the end of working hours. Corresponding sanctions will be imposed on those who practice habitual tardiness.

- A two (2) hour late is deemed as a half-day leave. This shall be automatically charged as a vacation leave (VL) and, therefore, be credited to VL balance, if there be any, otherwise, the corresponding deduction shall be applied. For employees not yet entitled to VL, the corresponding deduction shall likewise be applied.

Employees will be penalized accordingly if found not complying with the stated policy. Number of offenses and sanctions are as follows:

Number of Times Tardy	Corresponding Sanctions
8 times	Verbal Warning
13 times	Written Warning
20 times	3 working days Suspension without (w/o) pay
28 times	7 working days Suspension w/o pay
35 times	15 working days Suspension w/o pay
40 times	Termination

- **Meal Break Period**

The Company provides its employees with time to rest and recharge their

energy and enthusiasm towards work, and for this purpose a corresponding break period is provided on a Company time. This break period may be used for taking snacks or for resting. Exceeding break the period shall be considered loitering or wasting Company time and will be subject to sanction accordingly.

- **Undertime**

Refers to unauthorized time of leaving the workplace earlier than the regular quitting time of an employee.

An employee who wishes to go on undertime due to a valid reason must secure a written approval from his/her immediate superior but will not be compensated by filing an overtime or leave of absence.

- **Official Business**

Refers to occasions wherein employees are required to conduct and attend work outside the office or plant premises.

- **Absences**

Absence is the inability of an employee to report on his/her regular working day. Absence can be considered authorized by his/her manager if the reason is valid and justifiable; on the other hand, if absence is not valid, this shall be meted with disciplinary sanction after



due process has been accorded to the employee.

### C. Payroll

Employees are paid their corresponding salary every fifteenth (15<sup>th</sup>) and end of each month. The Company's pay procedure enables employees to receive payment for all worked time including overtime, rest day and holiday premiums through an Automated Teller Machine (ATM) Card. Payroll cut-offs are:

- Twenty first (21<sup>st</sup>) to fifth (5<sup>th</sup>) – for the fifteenth (15<sup>th</sup>) payday
- Sixth (6<sup>th</sup>) to twentieth (20<sup>th</sup>) – for end of the month payday

### D. Extended Work or Overtime

The Company may ask any employee to work beyond the prescribed working hours under, but not limited to, the following instances:

- To undertake activities in meeting certain deadlines;
- To complete incidental assignments which cannot be done during regular working hours;
- To reduce or eliminate work backlogs;
- When on client calls beyond the regular work hours; and
- Such other incidental activities as mandated or required by the Company.

- To execute any overtime work, all employees must accomplish and file an **Overtime Request Form (ORF), duly approved by the Immediate Superior at least one (1) day prior the actual over time to Human Resources.** For unplanned Overtime, employee may submit their Overtime Request Form on the same day of rendering Overtime.
- Upon rendering overtime, approved **Overtime Authorization Form (OAF) shall be forwarded to HR on or before cut-off date.**
- **Overtime Request Form (ORF) and Overtime Authorization Form (OAF) must be approved and duly signed** by respective signatories as defined in our OT approval matrix (Annex A).

**Late submission of both forms will not be accepted and will be accumulated on the following cut-off. Furthermore, non-conformance of approved ORF and OAF, would suspend the process of your overtime pay.**

Overtime remunerations follow government guidelines and policies.

### Employee Separation

#### 1. Resignation

- a. An employee may terminate his employment with the Company by serving a written notice through his/her immediate superior, one (1) month prior to the effective date of resignation. The resigning employee shall continue to work or render actual service during the

period covered by this notice of resignation. The Company may hold the employee liable for damages if no such notice is served to the Company by the resigning employee.

- b. The resigning employee must obtain clearance from the Company and all accountabilities must be settled. The employee must be cleared of any work obligation and/or accountability for money or property belonging to the Company and issued a formal clearance letter before his final pay may be released.
- c. The payment of monetary accountability by the resigning employee to the Company shall be through automatic deduction from the employee's last pay. All cash benefits due to the employee shall be included in the computation of the employee's last pay. If this payment-deduction is not sufficient to fully settle the employee's accountability, the remaining balance must be paid immediately by the employee, otherwise, the issuance of the clearance shall be withheld until such time that the financial accountability is settled.
- d. **One (1) week** prior to the effectivity of his/her resignation, the resigning employee shall turn over his/her responsibilities and/or accountabilities to his/her immediate superior through

proper discussions and submission and/or return of the following:

- o List of pending tasks or projects, indicating there in the status and actions that need to be done;
  - o Accomplished tasks or projects;
  - o Work procedure and contact persons/numbers necessary to carry out the tasks;
  - o Records, files and manuals under the care of the employee;
  - o Money accountabilities; and
  - o Properties assigned to the employee, including computers, keys, etc.
- e. Depending on the position, the Company can impose restrictions on access or authorizations of personnel to critical and confidential Company information at any phase of the turnover or clearance process.
  - f. The resigning employee is not allowed to create, keep or distribute copies of any Company-made or Company-owned intellectual property including policies, workflows/manuals, passwords, draft and final reports, contact information, costs/prices figures, etc. Anyone found out or subsequently revealed to have kept via email, USB/External hard drive, printed materials, or even photographs of any form of the Company's intellectual property would be considered corporate theft. Any copy to be made or kept must be given

the express written permission by the President during the clearance process.

**2. The release of the employee's final salary pay check shall be made only after the clearance is obtained and after the employee signs a "release/waiver/quitclaim" clearing the Company of further obligation to the said employee.**

The resigning employee may get his/her final check after one (1) month from the date of resignation. The resigning employee may be asked to submit to an exit interview to be conducted by the HR Manager/designated representative. Part of the interview is that the employee shall be asked to comment on his/her work experience with the Company, including his/her interpersonal relationship with superiors and peers.

**3. Termination of Employment**

3.1 Employment termination may be made in any of the following instances:

- i. End of employment contract
- ii. The Company may terminate the employment of a regular employee for any of the following causes or for any of the grounds stipulated in the Labor Code of the Philippines, as amended:
  - Serious misconduct or willful disobedience by the employee of the lawful orders of the

Company or its representative in connection with his/her work;

- Gross and habitual neglect by the employee of his/her duties;
- Fraud or willful breach by the employee of the trust reposed in him/her by the Company or its duly authorized representative;
- Commission of a crime or offense by the employee against the person of his/her employer or any immediate member of his family or his duly authorized representative; and
- Other causes analogous to the foregoing.
- Under its exercise of Management prerogatives, the Company may terminate any employee whose performance shows continued unsatisfactory results, or due to serious conflict of interest or such other causes embodied under this Handbook.

3.2 Termination of any employee shall be effected in accordance with due process and the procedures outlined in this manual.

3.3 The termination of an employee for cause shall automatically forfeit all his/her benefits. At the Company's option, criminal proceedings may be taken against him/her when necessary to recover any loss perpetuated by said employee against the interest of the Company.

3.4 The decision to terminate the services of an employee shall be implemented only upon the sole approval/direction of the Company's President after appropriate

deliberations by the Management and due process has been done.

3.5 Notice of termination or separation for cause shall be done in writing and given to the employee concerned, receipt of which shall be properly acknowledged. Upon receipt of said notice, the employee must immediately accomplish the following:

a. The employee must obtain clearance from the Company and all accountabilities must be settled. The employee should be cleared of any work obligation and/or accountability for money or property belonging to the Company and issued a formal clearance letter before his/her final pay may be released.

b. The payment of monetary accountability by the employee to the Company shall be through automatic deduction from the employee's last pay. All cash benefits due to the employee shall be included in the computation of the employee's last pay. If this payment-deduction is insufficient to fully settle the account, the remaining balance must be paid immediately by the employee, otherwise, the issuance of the clearance shall be withheld until such time that the financial accountability is settled.

c. The employee shall turn over his/her responsibilities and/or accountabilities to his immediate superior through proper discussions and submission and/or return of the following:

1. List of pending tasks or projects, indicating there in the status and actions that need to be done;

2. Accomplished tasks or projects; Work procedure and contact persons/number (if any) necessary to carry out the tasks;

4. Records, files, DVD/CD's, catalogues and technical data/documents, training and/or commercial documents and/or manuals under the care of the employee; and

5. Company Properties that are under the custody/assigned to the employee, including keys and computers (if there are any).

6. The release of the employee's final salary pay check shall be made only after the clearance is obtained and after the employee signs a "release/waiver/quitclaim" clearing the Company of further obligation to the said employee.

## **E. Administrative Policy**

### **Wearing of Company Identification Card (ID)**

The Company ID shall be worn at all times while inside the Company premises. Employees who are caught not wearing this prescribed identification shall be given corresponding sanction. In case of lost ID, the employee is required to report such loss and must arrange for its immediate replacement in coordination with HRD. An ID replacement fee will be collected.

**Dress Code**

The Company requires its employees to come to work in proper attire. Only Fridays and Saturdays are considered as “wash days” for Head Office employees.

Employee	Monday-Thursday	Friday-Saturday (washday)
<b>Head Office</b>	<b>Do's</b> Uniform; Slacks; Closed Leather Shoes, Sandals with heels	<b>Do's</b> T-shirt; Slacks/Denim Jeans; Closed Leather Shoes, Rubber Sports Shoes, Sandals
	<b>Don'ts</b> Slippers, Plunging Neckline, Sleeveless/Sando, Shorts, Flip-Flops	
<b>Plant</b>	<b>Monday-Sunday</b>	
	<b>Do's</b> Uniform; Denim Jeans; Complete PPE	
	<b>Don'ts</b> Slippers, Plunging Neckline, Sleeveless/Sando, Shorts, Flip-Flops	

**Visitors**

Visitors / suppliers shall secure Visitor's Pass with the Receptionist at the Head Office, (2) two days before the intended date of visit or personal business at the plant. The said permit shall be accomplished by the requestor and must be duly approved either by two of the approving authority.

**VISITORS / SUPPLIERS SHALL BE DENIED OF ENTRY AT ECC PLANT PREMISE WITHOUT PRIOR APPROVAL FROM EXECUTIVE OFFICE.**

**Inspections**

- No prohibited materials shall be brought inside the Company and Plant premises.
- No Company property shall be brought outside the Company and Plant premises without approved gate pass.
- Two (2) types of inspections:  
**Vehicular** – compartment  
**Pedestrian** – bags and body frisk

**201 File**

- Employees are advised to inform HRD of any changes in their personal information. Such information shall be forwarded to HR within 30 days of its change:
  - Have changed their address or telephone number;
  - Have legally changed their name;
  - Have additional dependent/s in the family;
  - Have changed their beneficiaries;
  - Have changed data on their income tax exemptions; and/or
  - Training certificate, whenever they have completed any.

**Bulletin Boards**

- Employees are requested to keep an eye on the bulletin boards located at designated places to keep abreast on announcements, job openings and general well-being.

- Established HRD policies and guidelines on the use of bulletin boards must be followed.

### **Safety and Housekeeping**

- The Company maintains suitable work facilities and each employee are expected to cooperate in keeping his office or work area as safe, clean, and neat as possible.
- The Company strives to make its facilities as safe as possible and employees should cooperate to avoid accidents. Employees must always remember that safety is part of their job.
- Company adopts 5s the Japanese Concept of Good Housekeeping
  - ✓ Seire - Sort
  - ✓ Seiton - Systematize
  - ✓ Seiso - Sweep/Sanitize
  - ✓ Seiketsu - Standardize
  - ✓ Shitsuke - Self- Discipline
- In cases of injuries and accidents, an employee is required to immediately act and report to his/her immediate superior or department heads and see that medical care is administered by the medical staff. Such emergencies must also be reported to the Safety Section.
- Each Employee is expected to cooperate, failure to observe safety rules, regulations and procedures can lead to disciplinary action.

### **Use of Emails and Computers**

- The use of computers, internal Electronic Mail system as well as the Internet is intended for business transactions only. These systems are in place to help employees utilize more effectively their time and resources to enhance ECC's effectiveness in conducting business.
- No social networking sites, no game sites, no pornographic or sexual material, etc.
- Employees who use computer resources and applications such as the Electronic Mail must take adequate protection to protect the Company's interests.
- Passwords are required to gain access to these applications. It is the responsibility of each employee to be aware of proper password controls including non-disclosure of password information and periodic password changes to guard against unauthorized access.
- No employee shall leave a logged-on terminal unattended to avoid security risk.
- Employees should inhibit themselves from reading the e-mail messages of other employees unless authorized to do so as the situation calls for it.

### **III.BENEFITS AND PRIVILEGES**

The Company adheres to lawful labor practices and ensures to provide all mandated benefits prescribed under the Labor Code.

## A. Statutory Benefits:

The Company provides its employees with a reasonable degree of social security as mandated by law. They are, therefore, eligible to enjoy all the benefits stipulated by law given continuity of their contribution.

In compliance with statutory requirements and subject to government guidelines and procedures, the Company extends the following benefits:

### a. Social Security System (SSS) Benefits

- Maternity Benefit

The Maternity Benefit is a sixty (60) day allowance paid to a female member who gives birth through normal delivery, has a miscarriage or an abortion, or a seventy eight (78) day allowance in case of caesarian section delivery.

Coverage:

1. The female member should be employed at the time of delivery, miscarriage, or abortion.
2. She must have given the required SSS notification through her employer.
3. Her employer must have paid at least three months of maternity contributions within the twelve (12) month period immediately before the semester of contingency.

The maternity allowance is equivalent to one hundred (100%) percent of the member's average daily salary credit multiplied by sixty (60) days or seventy eight (78) days in cases of caesarian section delivery.

- Paternity Benefit

Paternity leave refers to the leave credits allowing a married male employee to take a paid leave of absence from work, provided, that his spouse gave birth, had a miscarriage or a non-induced abortion.

Every married male employee, regardless of employment status, is entitled to paternity leave.

This shall only apply to the first four (4) deliveries of the employee's lawful wife with whom he is cohabiting.

In case the employee is not physically living together with the spouse because of his work station or occupation, he is entitled to the benefit.

The leave shall be for seven (7) working days with pay constituting of basic salary and mandatory allowances fixed by the Regional Wage Board, if any, provided that his pay is not less than the mandated minimum wage.

- Disability Benefit

**Features:**

The disability benefit is a cash benefit paid to a member who becomes totally or partially disabled, either in the form of a monthly pension or lump sum amount depending on his/her contribution.

**Eligibility:**

Members who suffer partial or total permanent disability, regardless of the number of monthly contributions paid to SSS, are qualified.

**Types of Benefits:**

- i. **Monthly Pension:** Cash benefit paid monthly to a disabled member who has paid at least thirty-six (36) monthly contributions.
- ii. **Lump Sum Amount:** Granted to those who have not paid the required thirty six (36) monthly contributions.

**Types of Disability:**

- **Permanent Partial Disability** – a condition that is incurable but the member is not totally prevented to engage in any gainful occupation. A member declared as partially disabled will receive a monthly pension payable for a limited number of months.
- **Permanent Total Disability** – an ailment that permanently prevents a member to engage in any gainful

occupation. A member declared as totally disabled will receive a monthly pension for as long as the member is disabled; guaranteed for five (5) years.

- The following are some of the ailments which are compensable:
  - Complete loss of sight;
  - Loss of two (2) limbs at or above the ankle or wrist;
  - Permanent complete paralysis of two (2) limbs;
  - Brain injury causing insanity; and
  - Other cases as determined and approved by SSS.

- **Solo Parent Leave**

In addition to leave privileges under existing laws, parental leave of not more than seven (7) working days every year shall be granted to any solo parent employee who has rendered service of at least one (1) year.

“Parental Leave” shall mean leave benefits granted to a solo parent to enable him/her to perform parental duties and responsibilities where physical presence is required.

“Solo Parent” is any individual who falls under any of the following categories:

- A woman who gives birth as a result of rape and other crimes against chastity even without a final conviction of the offender;



- Parent left solo or alone with the responsibility of parenthood due to death of spouse;
- Parent left solo or alone with the responsibility of parenthood while the spouse is detained or is serving sentence for a criminal conviction for at least one (1) year;
- Parent left solo or alone with the responsibility of parenthood due to physical and/or mental incapacity of spouse as certified by a public medical practitioner;
- Parent left solo or alone with the responsibility of parenthood due to a legal separation or *de facto* separation from spouse for at least one (1) year, as long as he/she is entrusted with the custody of the child/children;
- Parent left solo or alone with the responsibility of parenthood due to abandonment of spouse for at least one (1) year;
- Unmarried mother/father who has preferred to keep and rear her/his child/children instead of having others care for them or giving them up to a welfare institution;
- Any other person who solely provides parental care and support to a child or children; or
- Any family member who assumes responsibility of head of the family as a result of the death, abandonment, disappearance or prolonged absence of the parents or solo parent.
- A change in the status or circumstance of the parent claiming benefits under this Act, such that he/she is no longer left alone with the responsibility of parenthood, shall terminate his/her eligibility for these benefits.

- “Children” refer to those with and dependent upon the solo parent for support who are unmarried, unemployed and not more than eighteen (18) years of age, or even over eighteen (18) years but are incapable of self-support because of mental and/or physical defect or disability.

- **Death and Funeral Benefits**

Features:

The SSS Death Benefit is a cash benefit in the form of monthly pension or lump sum and an allowance for burial expenses given to dependents to cushion the adverse effect felt by the family due to the loss of a provider-member.

**Types of Benefits:**

- Funeral Grant Benefit of Twenty Thousand Pesos (Php20,000.00) – given to the beneficiaries or to any person who actually shouldered the burial expenses of the deceased member; and
- Lump Sum Benefit – equivalent to thirty five (35) times the basic monthly pension (if member has paid less than thirty six (36) monthly contributions before the semester of death); or
- Basic Monthly Pension (for life, depending on member’s contributions and credited years of membership) – guaranteed for five (5) years, with a minimum of One Thousand Pesos (Php1,000.00) per month, plus ten (10%) percent of said basic monthly pension to each dependent child not to exceed five (5),

beginning with the youngest and without substitution. (This shall apply if member has paid at least thirty six (36) monthly contributions before the semester of death).

**b. Phil Health Benefits**

PhilHealth is a health insurance program for Phil Health members and their dependents that get sick or injured and require hospitalization. They provide allowances for room and board, doctor's fees, surgical fees, and miscellaneous expenses during confinement.

Principal members are entitled to forty five (45) days coverage each year while their dependents also have forty five (45) days, which will be shared among them. Any unused benefit for the given year is not carried over to the succeeding year or is not cumulative.

**2.3 Employee's Compensation Rationale:**

Employees and their dependents are entitled to receive income benefits, medical or related rehabilitation services for work-related injury, sickness, disability or death.

Coverage: (at the start of employment)

1. Every employer with at least one employee; and
2. SSS registered employers and their employees are compulsory covered under the program.

Eligibility:

1. Employee should be duly reported to SSS;
2. Employee's sickness, injury or death is work-related; and
3. SSS has been duly notified of the sickness, injury or death.

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**Multi-purpose loan can be used in any of the following:**

- Educational
- Medical
- Livelihood
- Minor home improvement
- Purchase of Appliance and furniture
- Calamity

**Expanded Housing Loan Program can be used to finance any of the following:**

- Construction of a resident unit on a lot owned by the member-borrower
- Purchase of a lot not exceeding Two Million Pesos (Php 2,000,000.00)
- Purchase of a lot and construction of a residential unit thereon
- Purchase of a residential unit
- Refinancing of an existing loan
- Redemption of a foreclosed property

**d. Thirteenth (13<sup>th</sup>) Month Pay**

Employees, regardless of designation or employment status, shall be paid their

thirteenth (13<sup>th</sup>) month pay not later than December 24 of every year, provided that they have worked for at least one (1) month during the calendar year.

An employee who has resigned or whose services is terminated at any time before the time of payment of the thirteenth (13<sup>th</sup>) month pay is entitled to this monetary benefit in proportion to the length of time he worked during the year which is the equivalent of 1/12 of his/her total basic salary earned during that period.

**e. Service Incentive Leave Pay**

Every covered employee who has rendered at least one (1) year of service shall be entitled to a yearly service incentive leave of five (5) days with pay.

Part time workers are also entitled to full benefit of the yearly five (5) days service incentive leave with pay.

The service incentive leave shall be commutable to its money equivalent if not used or exhausted at the end of the year.

**f. Overtime and Holiday Pay**

**Overtime Pay:** Additional pay for service or work rendered or performed in excess of eight (8) hours a day by employees. Overtime remunerations follow government guidelines and policies.

**Holiday Pay:** Every employee shall be paid his/her regular daily wage during regular holidays. To receive the holiday pay, an employee should not have been absent without pay on the working day proceeding the regular holiday.

**g. Night Differential Pay**

Every employee shall be paid a night shift differential pay of not less than ten (10%) percent of his/her regular wage for each hour of work performed between ten o'clock (10:00 p.m.) and six o'clock (6:00 a.m.)

**h. Prescribed Minimum Wage**

The Company follows the prescribed Regional Tripartite Wages and Productivity Boards-prescribed minimum wage.

**C. Company Benefits**

The Company sees the value of having an excellent team of employees, and as such, on top of the government mandated benefits, it provides entitlements, such as the following:

**a. Vacation and Sick Leaves**

- Vacation Leaves (VL) – all eligible employees will earn these leaves upon confirmation of regularization and can only apply after a year of services from the date of hire.

- Sick Leaves (SL) - all eligible employees will earn these leaves upon confirmation of regularization and can only apply after a year of services from the date of hire.

These earned leaves are both convertible to cash, but only in excess of the 15/15 entitlement. These are paid on every second (2<sup>nd</sup>) period of the month of the following year.

b. **Group Life and Accident Insurance**

Upon engagement, an employee will be covered by the Company's Group Accident Insurance Plan.

c. **Health Maintenance Insurance (HMO)**

The Company provides accredited HMO for regular employees.

d. **Uniform**

All regular employees are provided with free sets of uniform. All employees are enjoined to report for work wearing complete and proper uniform including safety footwear.

e. **Meal Allowance**

Company gives priority over the welfare of its employees to maintain high level of satisfaction. To achieve this, a meal allowance shall be provided to all employees in order for

them to bring home their hard earned money without the need to spend for their everyday meals while at work.

- Availment is through Proximity Card issued to each ECC employees.
- Excess of Php 150.00 per day must be paid in cash up front.
- Salary deduction is prohibited regardless of rank/position
- Personal transactions or "paluto" as regular meal with no available balance must be paid in cash.
- Personal transactions or "paluto" for special occasions with/without balance (e.g. birthday) must be paid in cash.
- Unused meal allowance can be accumulated and won't be forfeited for a year

• **Food delivery**

- Employees who opt to have their meals delivered to their work areas must swipe their Proximity Card after the end of their shift.

• **Others**

- An employee who treats visitor & contractors shall be obliged to pay in cash, salary deduction is prohibited. Failure to do so will be charge maximum cost.
- Company guests, visitors, training are all chargeable to ECC, provided a confirmation email with approval of Vice President-Plant Operations. A designated proximity card for

such are with Human Resources for recording purposes.

f. **Canteen Services**

The Company provides a canteen for employees where they may take their meals during break periods. The Company strives to keep prices of food at reasonable levels by directly subsidizing the costs for the acquisition, use and replacement of canteen facilities, equipment, and utensils.

CANTEEN SERVICE		
SHIFTING SCHEDULE	CAFETERIA	PLANT CANTEEN
1 <sup>st</sup> shift 12:00 am-8:00am	-close-	-close-
2 <sup>nd</sup> shift 8:00 am-4:00 pm	6 a.m.-9 a.m.	11:30 am-1:30 p.m.
3 <sup>rd</sup> shift 4:00 pm-12:00 am	6 p.m.-8 p.m.	3 p.m.-8 p.m.

g. **Retirement Plan**

In recognition of its employees' dedication, faithful, and long years of service to the Company, the Company provides a retirement plan benefit to qualified and eligible employees. The Company follows the prescribed law on retirement to enable them

and help spend quality life after their working years.

1. **Compulsory Retirement** – An employee shall be compulsorily retired at any time within the calendar year after he attains the age of sixty (60), and shall be entitled to the retirement benefits.
2. **Optional Retirement** – As mandated by law, an employee must retire upon attainment of at least age of fifty (50) and shall be entitled to retirement benefits.

h. **Rice Subsidy**

A grant from ECC management whereby a qualified employee (regular employee with one (1) year of service) is entitled to receive Php 1,000.00 monthly.

C. **Competency Based Profiling**

Company is promoting a Competency **Based Profiling** it is a system/model to accurately map the required COMPETENCIES of employees in the workplace.

Importance:

- Help improve individual performance, by modelling the behaviors that make high performing employees successful in their jobs

- To provide a way to measure employee performance and align performance with business strategies.
- Clarify workforce standards and expectations.
- Align individuals, teams and managers with the organizations business strategies.
- Develop equitable, focused appraisal and compensation decisions.

- the responsibilities of the position;
- the SIGNIFICANT CONTRIBUTIONS made and performance demonstrated by the employee;
- competitive rates of the job/position in the market; and
- wage policies mandated by the government.

#### D. Performance Review

The Company encourages and promotes Team efforts and rewards the same for achieving **Corporate BSC Goals**. Corporate goals are different from individual goals; **INDIVIDUAL Goals** are a set of **Balance Score Card** dimension goals focusing on an employee's individual performance and contributions.

**Balance Score Card** is a management tool that provides stakeholders with comprehensive measures of how the organization is progressing towards the achievement of its strategic goals. It is a tool applied in fulfilling the critical components of Performance Management.

It is a Company policy to provide all employees with COMPETITIVE and EQUITABLE compensation relative to:

The Company desires to develop its employees to the optimum level of their potentials so that each one performs to the highest level of productivity and fulfill their personal employment goals. Towards this concept, every fiscal year, every employee's performance is reviewed and appraised by the employee's immediate superior, once every semester. This performance review becomes the formal process of assessing the employee's actual performance following agreed upon goals/objectives, said exercise is also an opportunity to formulate programs and improve unsatisfactory performance results. The performance review also becomes a systematic approach to recognizing present and potential abilities of each employee.

Salary adjustments and performance incentives, if any, are given to deserving employees with written announcements from the Management. The employee's accomplishments, including the quality of

performance and work attitude as rated and contained in the results of the performance appraisal report shall serve as the criteria for salary adjustments, promotions, awarding of incentives and employee termination.

The Company is a strong advocate of pay-for-performance and believes in meritocracy. There is a tight linkage between the performance management systems. As such, an increase in pay is mainly based on performance.

#### **E. Promotions**

It is the Company's belief and policy to identify the potential of employees and give opportunities of growth through promotion to those who have shown excellent performance, manifest potentials for further growth and have necessary skills to undertake bigger responsibilities. All promotions must be justified, recommended and endorsed for approval by the immediate superior, noted by the Department Head and approved only by the President. HR shall be in charge of its documentation.

The Company adopts a policy of selecting from the existing pool of employees in case there is/are higher position/s to fill up. Recruitment from external sources is resorted to,

only when and if there are no qualified employees from within to fill up the position.

#### **F. Learning and Development**

The Company recognizes that its human resource is the basic anchor of its sustained viability and growth. To this end, the Company adopts manpower training and development programs for systematic acquisition, enhancement and development of employees' attitude, knowledge, skills and behavior patterns that are required for a given job function.

Training is anchored on the needs of the business and the impact on the Company's bottom line. Education and training help optimize the productivity and performance of the employees and enable them to contribute to the profitability of the Company.

Education and training are holistic and comprehensive in content and approach. The company develops the employee not just on technical or functional expertise but on work support skills and leadership/management. In terms of approach, the Company utilizes training programs, and experiential and mentoring approaches to deliver training.

The various training programs are either conducted in-house, or third party outsourced. The Company has the sole option of the choice and type of training that may be given to an employee. In general terms, Company-sponsored training programs are given to the employees at no charge to them. However, there are specific types of training that may require a special contract signing between the Company and the employee; the terms and conditions of which are separately issued to the trainee upon his/her selection. Any form of education or learning requires the commitment and dedication of the trainee/student to the training program. **In this respect, every employee must commit himself to attend the training program once he is selected for attendance; in instances that an employee opts not to attend the said training, a letter of explanation, authorized/signed by his immediate superior shall be required otherwise, a sanction shall be given to the employee for refusal.**

The employee may, at his own expense, take other non-Company sponsored training programs which can supplement the programs available from the Company. Attendance to these programs, however, requires pre-approval from the Company, so as not to compromise Company time and possible loss of focus of the employee on his/her job functions.

## **V. Employee Protection**

The Company values the dignity of every individual. Towards this end, the Company strongly opposes harassments in any form, deeming this as illegal. The Company actively implements mechanisms for dealing with such occurrences and ensures that it will act justly, swiftly and decisively in addressing such complaints.

The Company is also committed to promote a work place that is free from drug abuse as it is detrimental to the health, safety and work performance of employees and poses risks to operations and product quality.

## **VI. Safety**

The Company seeks to have accident-free operations in its offices and Plant facility. The policy on safety is derived from principles, values, legal and regulatory requirements, and is operational through the implementation of standards of performance and well-documented standard operating procedures. These are further reinforced by regular installation audits and proactive education of the workforce.

## **VII. Labor Relations**

It is the policy of the Company to be a concerned and progressive employer and believes firmly in treating its employees with respect and compensating them well.



The Company also maintains that the income, security of tenure, working conditions, quality of life, long-term growth and development of each employee depend on the success of the business.

Its Labor Relations policy is guided by the following principles:

- Industrial Peace

The Company expects each employee to obey and comply with lawful Company orders, rules and regulations and policies. The Company firmly believes in industrial peace as a precursor to a successful conduct of business. It is imperative for both management and labor to respect each other's rights and cooperate in a spirit of mutual benefits and the attainment of business targets.

- Right to Discipline

The Company will always uphold and exercise its right to discipline its employees. It will respect and comply with due process. Employees found guilty of any offense will be meted out the appropriate penalty.

Management promulgates rules, regulations, and policies in accordance with law.

## VIII. CODE OF ETHICS

This **Code of Ethics** (this "Code") is designed to promote honest, ethical and lawful conduct by all employees, Officers and Directors of **Eagle Cement Corporation** ("ECC" or the "Company"). This Code is intended to help employees, Officers and Directors understand the Company's standards of ethical business practices and to stimulate awareness of ethical and legal issues that may be encountered in carrying out their responsibilities. In addition, independent contractors, subcontractors, consultants, agents and sales representatives who provide services to ECC are expected to observe the same high standards as the Company's employees, Officers and Directors while working or transacting with the Company.

The actions of every employee, Officer and Director affect the reputation and integrity of the Company. Therefore, they are required to review this Code and develop a working knowledge of its provisions. In addition, Executive Officers of the Company, which include the Chairman of the Board of Directors, Chief Operating Officer ("COO"), President and Vice President, as well as members of the

Company's Board of Directors will be required to sign a certification acknowledging that they have read this Code and agree to comply with its terms. All employees and Officers which include all Managers and Supervisors are required to sign a certification and expected at all times to:

- Comply with all applicable laws, governmental rules and regulations as well as all Company policies;
- Pursue the ethical handling of actual or apparent conflicts of interest when conflicts or appearance of conflicts are unavoidable, including thorough/full disclosure (to a responsible Supervisor or the Human Resources ("HR") Officer) of any transaction or relationship that reasonably could be expected to give rise to a conflict;
- Promptly report (to a responsible Supervisor or the HR Officer) any violations of this Code; and
- Be accountable personally for adherence to this Code.

It must be kept in mind that failure to conduct business in compliance with these guidelines may result in disciplinary actions, up to and including termination.

These guidelines should be a part of every employee's daily working practices. If he/she will need further guidance in applying them to

his/her specific situation, a Supervisor or Manager should be able to help him/her. In some cases, an employee may need to contact a group such as the HR Department for more specific guidelines or opinions.

The employees' understanding of these guidelines will help ensure that the Company and its employees conduct their business with uncompromising integrity and professionalism.

### **A. Compliance with Laws, Rules and Regulations**

All employees and Officers must respect and obey the laws, rules and regulations of the cities, provinces, towns, and country in which the Company operates. Employees are expected to be familiar with the legal and regulatory requirements applicable to their business responsibilities and to fulfill their duties in accordance with these laws and regulations.

Questions concerning the applicability of any legal or regulatory provision should be directed to ECC's Legal Counsel.

The Company expects all its employees to act with the highest standards of honesty and ethical conduct while working within the Company's premises.

Certain legal obligations and policies that are particularly important to the Company's business and reputation are summarized below.

## **B. ANTI-FRAUD POLICY**

### **1. Purpose**

This Anti-Fraud Policy is intended to supplement all applicable rules and regulations and other corporate policies of Eagle Cement Corporation ("ECC"), including its Code of Ethics. This Policy sets out ECC's expectations and requirements relating to the prohibition, recognition, reporting and investigation of suspected fraud, corruption, misappropriation and other similar irregularities. This Policy applies to ECC's employee, Executive Officers and Members of its Board of Directors.

### **2. Definition of Fraud**

The term "fraud", used in this Policy, refers generally to any intentional act committed to secure an unfair or unlawful gain including, but not limited to, fraud, corruption, theft and other similar irregularities that reflect actual or potential:

- Misrepresentation in ECC's publicly released financial statements or other public disclosures;

- Misappropriation or theft of ECC's assets such as cash, inventories, corporate certificates, plant blueprints, pertinent document, equipment, tools or supplies;
- Unlawfully obtained revenue, expenses and assets, or unlawful avoidance of costs and expenses;
- Claiming Reimbursement for fictitious expenses;
- Commercial bribery or bribery of a government official or other violation of anti-corruption laws; or
- Improper payment schemes such as employees or Directors of ECC's seeking or accepting from, paying or offering to, suppliers or business partners, kickbacks or gifts intended to or which may appear to influence business judgment.

### **3. Reporting of Fraud**

ECC expects all its employees to take all reasonable steps to prevent the occurrence of fraud and to identify and report instances of known or suspected fraud ("Fraud Concerns") committed by or against ECC, whether by ECC employees or third parties. As a general guideline, Fraud Concerns should be promptly reported by an employee to a Manager or Officer in the first instance.

An employee may also call the confidential Ethics Hotline **(02) 301-3453 Loc 126, 127, 235 and 236 or 09178776608** should he/she be uncomfortable speaking with his/her Manager for any reason.

#### **4. Handling of Fraud Concerns**

The Human Resource ("HR") Officer / Corporate Internal Audit Office shall be responsible for all Fraud Concerns received through a Formal Reporting Channel and shall ensure that prompt and appropriate action are taken in respect of such Fraud Concerns. Fraud Concerns received by Managers/Officers shall be reported to the HR Officer / Corporate Internal Audit Office in accordance with the Code of Ethics/Anti-Fraud Reporting Violation of the Code Policy.

#### **5. Disciplinary Action**

An employee or Officer found to have been involved in fraudulent activity or other mis- conduct or has failed to report a known or suspected instance of fraud will be subject to disciplinary action, up to and including termination.

### **Employee Discipline**

The Company expects each employee to observe reasonable standards of conduct in:

- The performance of his work;
- His relationship with fellow employees; and
- His dealings with the public.

For this purpose, the Company established certain standards of conduct which are consistent with:

- Company philosophy and objectives;
- Government policies and regulations; and
- Promotion of harmonious and productive relationships among employees and with the public.

### **C. WHISTLE BLOWER POLICY**

#### **POLICY STATEMENT**

It is of primary importance that a business, in all of its activities, must operate in full compliance with applicable laws, rules and regulations. Therefore, all Employees must exemplify the behaviour and professional demeanour consistent with such laws, rules and regulations, as well as the Company's stated policies and procedures.

All employees are encouraged and empowered to report their concerns should they suspect or become aware of any illegal or unethical activities.

## SCOPE

This policy is applicable to all employees of Eagle Cement Corporation, as well as external parties who conduct business with the organization.

## DEFINITION OF TERMS

*Board of Directors* - approves the vision, strategic objectives and key policies for management of the Corporation. The Board also ensures the adequacy of internal controls and risk management practices, accuracy and reliability of financial reporting and compliance with applicable laws and regulations.

**Audit Committee - Fulfills the oversight responsibility of the financial reporting process of the company** -that may impair the objectivity of a person because of the possible incompatibility may impair the objectivity of a person because of a possible incompatibility of the instigator's self-interest and professional or public interest (e.g. inappropriate relations or questionable transactions with clients or suppliers, misuse of clients/company information etc.)

### a) Misconduct or Policy Violations

Misconduct or policy violations refer to acts that violate moral or civil law, Code of Ethics, policies of ECC.

### b) Theft, Fraud or Misappropriation

Theft, fraud or misappropriation refers to fraudulent appropriation of funds or properties entrusted to the Employee's care but actually owned by the employer or someone else in the organization (e.g. stealing, misappropriation of funds, false representation etc.)

### c) Falsification of Documents

Falsification of documents refers to counterfeiting, forging, falsifying or making fraudulent changes to any document (e.g. signature or approval forgery, alteration, tampering, etc.) This also covers misrepresentation (e.g. Respondent pretends to have authority to represent or decide for the Company's interests to the external parties).

### d) Financial Reporting Concerns

Financial Reporting Concerns refer to deliberate misstatements in recording and/or reporting business transactions or results of operations (e.g. incorrect recording of financial transactions, irregularities in

application of accounting standards, misleading reports, etc.)

e) Gross Negligence of Duties and Responsibilities

These refer to any situations where the actions (or lack thereof) of employees cause substantial disadvantages to the point of possible sabotage (be it loss of revenue, increased risks or problems, etc.) for the Company (e.g. sleeping on the job by-an operator causing the machine failure, the non-execution of sales or purchase orders causing lost revenues or lost reservations/deliveries).

Any concern not relating to the above conditions shall be filed with the appropriate unit designated by ECC.

A. REPORTING CHANNELS

The following are dedicated reporting channels that the Whistleblower can use to file any Reportable Condition:

a) Face-to Face Meeting :

At the option of the whistleblower, he can meet with any member of the Ethics Committee (VP-Support Group, HR Manager, Corporate Internal Auditor). The Operator of face-to-face meeting shall ask the

Whistleblower to sign the transcript of discussions between them.

b) E-mail : [exe.ofc@eagle-cement.com.ph](mailto:exe.ofc@eagle-cement.com.ph)

c) Mail : 153 Epifanio Delos Santos Avenue (EDSA)

d) Attention To: The Ethics Committee

e) Telephone : Ethics Hotline (02) 301-3453  
loc. 106

f) Cell phone : Ethics Hotline 0917 8776608

B. ANONYMOUS REPORTING

The Ethics Committee shall accept reports made anonymously. The Whistleblower, who files a report, may choose to provide a manner by which he can be contacted without jeopardizing his anonymity. Such means shall include, but is not limited to, an email address, a prepaid mobile number, etc.

If the Whistleblower chooses to identify himself, the recipient of the report from any of the Reporting Channels shall ask the Whistleblower if he is willing to be identified in the course of the investigation.

C. WITHDRAWAL OF REPORT BY THE WHISTLEBLOWER

In the event that the Whistleblower withdraws

his report, the investigation shall continue provided that the evidence gathered is sufficient in accordance with the provisions of Section 7.3.

**CONFIDENTIALITY**

The Committee shall ensure confidentiality of information. It shall treat all reports, including the identity of the Whistleblower and the Respondent, in a confidential and sensitive manner. The identity of the Whistleblower and the respondent, unless compelled by law to be revealed, will also remain confidential , unless compelled by law to be revealed.

All witnesses interviewed or investigated are required by the Company to keep the existence of the investigation and any details confidential.

Any non-Committee members will only be notified on a need-to know basis. (e.g. related managers who need to be alerted will only be given very basic information).

**UNTRUE ALLEGATIONS**

If a Whistleblower makes allegations that are determined to be fabricated or malicious and persists in making them, a possible disciplinary or legal action may be taken against him, subject. Relevant to Company policies and procedures and any applicable laws.

**G. SPECIFIC PROCEDURES ON HANDLING WHISTLEBLOWING REPORTS**

- A. Submission/Receipt of Reports
 

Any report must be made through the appropriate reporting channels referred to in Section 4.2. The Whistleblower may choose to identify himself or remain anonymous, in accordance with Section 4.3.

  - i. In submitting a report, the Whistleblower shall disclose his relationship with ECC. In addition, the Whistleblower shall state if the information has been reported to anyone outside ECC and provide details if it was. To support his report, the Whistleblower shall provide any information and any files or evidence related to this report.
  - ii. Handling Initial Receipt of Whistleblowing Reports

The following Operations will handle initial receipt of Whistleblowing Reports from the different reporting channels:

REPORTING CHANNEL	OPERATOR
FACE-TO-FACE MEETING	Ethics committee
E-MAIL	
MAIL	

TELEPHONE	
FAX	

**7.2.1** In any case the whistleblower submits whistleblowing reports to immediate manager (Ref Code of Ethics VII, Anti-Fraud # 4), it is the responsibility of the Manager to refer and fully disclose the Whistleblowing Report to ECC Ethics Committee within a week / 5 days upon receipt of the report.

The manager or Ethics Committee shall ask the Whistleblower if he is willing to sign the transcript of discussions between them.

**B. Preliminary Evaluation of Whistleblowing Reports**

The Ethics Committee shall evaluate whether the information provided by the Whistleblower is sufficient and within scope.

The information in a report, whether anonymously filed or not, shall be considered sufficient if:

The Respondent is identified by his full name and/or department or position, and;

Charges are specified, including the relevant and material facts (e.g. nature of the incident, time and places of the incident, persons involved, evidence, if any, and other important

matters necessary to establish a case).

In case of insufficient information, the Ethics Committee Chair shall notify the Whistleblower. If he is identified or can be communicated with, in accordance with Section 4.3 paragraphs 1, about such insufficiency, the Ethics Committee may decide to close the case and take no further action .

The Committee discourages broad tips/reports as these will just lead to the slowing /ineffectivity of the Committee.

**C. Communicating with Whistleblowers**

Member of the Ethics Committee shall meet the Whistleblower to update of the status of his report (e.g., Open/No actions taken yet, under investigation/corrective action being done, closed).

**D. Preliminary Investigation**

Ethics Committee shall conduct a Preliminary Investigation in a discreet manner and in accordance with existing laws, rules and regulations, applicable policies and procedures of ECC. The committee may invite a company lawyer for consultation during the preliminary investigation. During the preliminary investigation, the Internal Audit Committee, with the help of the member of the committee, shall search for evidence or probable cause that would support the case against the



Respondent.

Nevertheless, the Committee may assign any of its respective senior assign the task of further investigating the reports escalated to the Committee to any of its respective sr. staff . Such classifications may depend on the nature of the report.

In the event that a report involves an Employee who is a member of the Committee or his subordinate, the said member shall not be allowed to directly handle the investigation in order to avoid the appearance of bias and conflict of interest.

#### E. Full Investigation

After the investigation has been completed and the report is substantiated, the Committee shall turn over the report to HRD for appropriate action. The HRD shall coordinate with the Committee in conducting full investigation in accordance with applicable Company policies and procedures. Executive Officers may act in place of the HRD or Audit member, if needed.

#### F. Reporting

The HRD shall provide the Committee a report of the findings and resolution of the case.

The Ethics Committee Chair shall report to Audit Committee of the findings and resolution of the case for approval. Upon approval of

the final resolution, the case records shall be closed and the Whistleblower shall be notified of the update.

### **Monitoring**

#### G. Visibility of Reports

ECC Corporate Internal Audit shall have visibility of reports from all channels, as long as they have been entered into an E-mail by the Whistleblower, or by the Operator itself. In order to ensure that reports from such channels are not overlooked or mishandled, dual dissemination shall be employed.

#### H. Quarterly Reporting to the Audit Committee

Corporate Internal Audit shall maintain a log of all reports received and shall submit a quarterly report to Audit Committee on:

- All Reports received
- Status of outstanding reports, and;
- Final Resolution of reports

### **Archiving**

Corporate Internal Audit shall log and maintain a case file for each of the reports. The Human Resources Department shall maintain a copy of the final resolution of each case. Those cases entailing disciplinary actions must be filed in the 201 Files of the Respondents.

**Reports, including case files, shall be retained in** accordance with the archiving policies of ECC.

## RESOLUTION PERIOD

All cases must be resolved within a reasonable time, as determined by ECC after all relevant documents have been obtained.

## D. GIFT POLICY

### Purpose

Eagle Cement Corporation (ECC) Code of Ethics requires that all employees demonstrate our organization's commitment to treat all people and organizations, with which we come into contact or conduct business, impartially.

This Gifts and Gratuity Policy is supplemental to company Code of Ethics, and company values, and other corporate policies. This Policy sets out ECC's expectations and requirements related to requesting, accepting or offering any form of gifts, meals, entertainment and travel. This Policy applies to every ECC employee and officers of the company.

### 1. Definition and Standards and Requirements

All ECC employees and officers are prohibited from requesting, accepting or offering any form of gift or gratuity in connection with any corporate expenditure or sale of goods or services from all vendors, suppliers, customers, employees, contractors, consultants, potential employees, potential vendors or suppliers, and any other individual or organization.

Gifts and gratuities include, but are not limited

to, cash, tickets to events, entertainment in general, paid vacations, electronic equipment, liquor, food, golf/basketball, and other items of value given by Third Parties e.g vendors, suppliers, customers, employees, contractors, consultants, potential employees, potential vendors or suppliers, and any other individual or organization to Employees or Officer with whom they transact, whether directly or indirectly, in relation to ECC business dealings, and regardless of the place where such Gifts are offered to or received by an Employee or Officer.

As one effort to demonstrate our commitment to these standards and behavior, all employees must abide by the following policy requirements.

### 2. Gift Receiving (General Rule)

No gifts of any kind, that are offered by vendors, suppliers, customers, potential employees, potential vendors and suppliers, or any other individual or organization, regardless the of value shall be accepted or received by ECC employee or officer, at any time, on or off the work premises.

- Business meetings held in locations that do not conform to accepted standards of propriety and are not conducive for business purposes must be avoided.
- The direct or indirect offer, payment, solicitation and/or acceptance of Bribes in any form by an

Officer or Employee from a Third Party and vice-versa, is prohibited.

- Officers or Employees shall refrain from requesting for or soliciting any form of Entertainment from a Third party including sponsorship for Company activities, non-Company supported charitable works, and/or personal events such as birthdays, weddings, baptisms, etc., or from accepting such Entertainment where such acceptance could impair their objectivity in the performance of their duties and obligations to the Company.

**Exceptions:**

Exempted from this policy are gifts obtain, as members of the public, at events such as conferences, training events, seminars, and trade shows, that are offered equally to all members of the public attending the event. This includes attendance at and food, beverages, provided at events, trainings etc., funded by conference or event sponsors.

Exempted are meals during business meetings or session to benefit and advance positive working relationships and company interests. These activities are expected to be reciprocated by our company in turn are acceptable.

Exempted are gifts or donations solicited by and/or given to the Company for Company-

authorized corporate social responsibility programs or initiatives, including outreach or charitable works of the Company's officially recognized employee organizations, such as medicines for medical missions, food and supplies for calamities, materials for community development are acceptable;

Gifts of food that may arrive during the holidays, and at other times of the year when gift giving is traditional, belong to the entire staff even if addressed to a single employee. Under no circumstances may an employee take a food gift home; food gifts must be shared with and distributed to all staff.

Employees or Officers are required to professionally inform vendors, potential vendors, contractors and others with whom they transact, whether directly or indirectly, in relation to ECC business dealings of this corporate policy on gift and gratuity, and the reasons the company has adopted the policy. Employees will request that vendors respect our company policy and not purchase and deliver any gift for our employees, a department, an office or the company, at any time, for any reason.

3. Employees are encouraged to reject gifts in a polite manner, **but if rejection would be inappropriate and if not possible to return the gift**, employees may accept gifts at the time of presentation in order to show respect to the gift giver. Although it should not occur frequently, an

employee who accepts a gift shall promptly document and report the gift to the immediate supervisor or manager and turn the gift over to the designated central repository (pls. refer to HR Department for guidance), to avoid the perception of improper influence

Gifts turned over to the company will be disposed of accordingly.

I. Gift Giving (General Rule)

**1. ECC employees and officers are prohibited from offering** gifts of any kind to any third party or government regulatory official / employees or to someone with the intent of obtaining favorable treatment from the recipient.

**Exception:**

A gift may be given less than Nominal Value of P500 per year to an **individual** and or less than P2,000.00 per year to **business partner** (e.g. distributors, dealers, local supplier) to promote ECC's products and legitimate business interests provided the gift is legal and in accordance with business custom; infrequent; appropriate for the occasion; not cash (or cash equivalents, such as gift cards or cash coupons); and not of a nature that would make the recipient feel obliged to the gift-giver or to the company. Any gift given in the

name of ECC must be paid for by the Company in accordance with this Policy.

In the exceptional circumstance that an employee or officer believes that a gift of greater than nominal value is appropriate, an employee or officer may request that the company purchase a higher value gift subject to Approval of the President.

**Violations of the Policy** – Any Officer or Employee, who fails to comply or violate with this policy shall be subject to disciplinary action, up to and including dismissal.

**Questions** – For any questions about this policy or in the determination of whether a situation violates or potentially violates this policy, you may approach your respective superior, HR Department.

**E. WORKPLACE ETHICAL RELATIONSHIP POLICY**

**Purpose**

To further enhance ethical norms within the standards acceptable by the company through established guidelines on becoming associated with co-employees, vendors, customers, contractors and other third parties, by way of any kind of personal relationship either by way of becoming a sponsor or godparent, having romantic relationships,

practicing favoritism, all of which may affect personnel in giving an independent or fair decision.

### **Policy**

ECC is committed to the highest standards of ethics and business conduct. The Company conducts its business as a good corporate citizen. This commitment and standard of conduct governs our relationships with customers, vendors, competitors, and between each other as Employees on every organizational level.

To achieve this commitment:

Employees are prohibited or must refrain from having personal close ties with suppliers, clients/distributors, co-employees by way of any kind of mutually-benefiting relationship (i.e. sponsorship or god parenting by way of marriage or baptism activities, romantic ties, etc.).

Superiors (i.e. supervisor, manager) should refrain from and avoid accepting invitations to be a godparent of a subordinate or any employee within his scope of influence - and vice versa. With that, the company also discourages any romantic relationships are as follows:

- Employee with contractor, supplier, customer
- Immediate superior with subordinate
- Superior with indirect subordinate, but has the power / influence over certain department and / or within the department

Which may bring potential conflict to the business interest of the company. In addition, this is to maintain an ethical standard and fairness during the job evaluation of any respective subordinate and undue treatment in general working conditions.

Employees with direct or indirect contacts with vendors, distributors, and contractors should refrain from accepting or soliciting sponsorships/god parenting from these third parties. For existing relations like this, granting or acceptance of any excessive gifts is also discouraged and should be reported to the company through the FBID's Declaration of Gifts form. This may influence ethical relationships concerning the company's interaction with vendors, distributors and contractors.

This policy is to ensure that all employees will be able to execute their functions and represent their roles without outside perception of any undue influence.

The aforementioned kinds of relationship may lead to potential conflicts of interests where such can undermine personnel's business judgment and question one's loyalty and responsibility to the company.

Accordingly, all apparent and potential conflicts of interest should be scrupulously avoided.

## I. CONFLICT OF INTEREST

### ***“Any employee must avoid any conflict of interest”***

It is ECC's policy that all employees avoid any activity that is or has the appearance of being hostile, adverse or competitive with the business of the Company, or interferes with the proper performance of duties, responsibilities or loyalty to the Company. Therefore, ECC requires all its employees and Officers to;

- Conduct business affairs with fairness;
- Avoid granting undue personal favors;
- Engage only in private activities or business consistent with responsibilities as Officers and not detrimental to the interest of the Company;
- Refuse gifts that might connote bribery in anyway;
- Utilize Company property, funds, equipment and time solely for Company purposes and recognize that all intellectual property and rights so

created are owned by the Company;

- To seek prior Management Clearance before engaging in outside work.
- Submit and sign the Company's Full Business Interest Disclosure Agreement.

## II. Employment Practices and the Workplace Environment

### ***Nondiscrimination and Diversity***

ECC respects, values and welcomes diversity in its workforce, as well as in its customers, suppliers and the marketplace. ECC's policy is to comply with all applicable laws and to provide equal employment opportunity for all applicants and employees without regard to non-job related factors such as race, color, religion, sex, national origin, ancestry, age, disability, veteran status, marital status or sexual orientation. This policy applies to all areas of employment, including recruitment, hiring, training, promotion, compensation, benefits, transfer, and social programs.

### ***Harassment-Free Workplace***

ECC is committed to providing a workplace free of all types of harassment. ECC strongly disapproves of, and will not tolerate, harassment of employees by Managers or co-workers. ECC will also provide a work environment to protect employees from harassment by non-employees in the workplace.

Harassment includes verbal, physical and visual conduct that creates an intimidating, offensive or hostile working environment or that interferes with work performance. Sexual harassment includes behaviors such as solicitation of sexual favors, unwelcome sexual advances or other verbal, visual or physical conduct of a sexual nature.

### **Workplace Violence**

ECC has a policy of zero tolerance for violence. Violence includes physically harming another, shoving, pushing, harassing, intimidating, coercing, brandishing weapons, and threatening or talking of engaging in those activities.

It is ECC's intent to ensure that everyone associated with the business, including employees and customers, never feels threatened by any employee's actions or conduct. It is everyone's business to prevent violence in the workplace. Employees can help by reporting any workplace incident that could indicate a co-worker is in trouble. Employees are encouraged to report any incident that may involve a violation of any of the Company's policies that are designed to provide a comfortable workplace environment.

Environmental, Safety and Health Standards and Practices

ECC is committed to achieving a safe, healthy and environmentally friendly workplace, and is dedicated to principles and practices of "continuous improvement" in striving to provide high quality Environmental, Safety and Health (ESH) standards and practices for team members, customers, visitors, suppliers and the communities in which they live and work.

ECC shall continue to demonstrate environmental responsibility through compliance with all relevant environmental regulations, implementation and monitoring guidelines, and training of team members to minimize the opportunity for environmental risk to include proper storage, transportation and disposal of hazardous or proper containment of waste materials, conservation of natural resources and energy management.

ECC shall strive to eliminate accidents, occupational injuries and workplace illnesses by providing the appropriate training and support for team members, suppliers, contractors and visitors.

ECC shall ensure that safety and environmental responsibility shall take precedence over expediency, and that its ESH standards meet government and local requirements.

ECC expects all team members to comply with its ESH policy by getting the appropriate education and training to carry out ESH requirements in all phases of work and business.

### **Physical Security**

ECC aims to provide a secure business environment for the protection of its employees, products, valuable materials, equipment and proprietary systems and information. Materials, equipment and systems incorporated into the design of facilities and grounds will ensure adequate security in these areas. Security is the responsibility of all employees. Any breach of security should be reported immediately to a Manager or Officer of the Company.

#### **Identification and Badging**

Anyone entering an ECC facility (e.g. Bulacan Cement Plant, Off-Site Warehouses and Headquarters) is required to wear an ECC-issued identification badge. Badges should be visible at all times. All badges are the property of ECC and must be returned upon request. No modifications or additions should be made that will interfere with the visibility, clarity or use of the badges.

#### **Quality**

ECC is committed to pursue quality in every aspect of its business.

In order to sustain compliance with the quality policy of ECC, the employees shall:

- Satisfy the requirements of its customers;
- Share the benefits of being a proficient and environmentally accountable cement producer;
- Respond swiftly to the ever changing service needs of the market;

- Contribute to the long-term economic, environmental and social sustainability;
- Comply with relevant environmental and safety legislation and policies; and
- Continually improve the Quality Management System.

#### **Employee Reimbursements and Advances**

ECC's intention is to fund management-approved business travels, transportation, trainings, and other expenses necessary to conduct its business. Every employee is responsible for the accuracy, completeness and timely filing of the required forms, including appropriate supporting documentation for receiving reimbursements and advances of funds. It is the responsibility of the approving Manager to ensure that reimbursable expenses or funds advanced are reasonable, ordinary and necessary to conduct ECC's business.

### **III. Business Practices**

#### **Accounting Practices, Books and Records and Records Retention**

It is the policy of ECC to fully and fairly disclose the financial condition of the Company in compliance with applicable sound accounting principles, laws, rules and regulations and to make full, fair, accurate, timely and understandable disclosure in its periodic reports



filed with the Philippine Regulatory Government Offices e.g, Securities and Exchange Commission, Bureau of Internal Revenue. Honest and accurate recording and reporting of information are critical to the Company's ability to make responsible business decisions. The Company's accounting records are relied upon to produce reports for the Company's management, rating agencies, investors, creditors, governmental agencies and others. The Company's financial statements and the books and records on which they are based must accurately reflect all corporate transactions and conform to all legal and accounting requirements and the Company's system of internal controls.

#### ***Records Retention***

Business documents and records are important company assets. They contain data and information critical to the continuity of the Company's business, preserve information necessary to protect its legal rights and support and document tax and other regulatory requirements. Employees are prohibited from tampering with Company records or removing or destroying them prior to the dates specified in records retention schedules. Any destruction or disposal of such records needs prior explicit approval of top management before execution.

### **IV. Use and Protection of Assets and Electronic Systems**

#### ***Protection of Company Assets***

Every employee is responsible for protecting the assets of the Company. Each employee is also

responsible for understanding ECC's obligation of protecting assets that have been entrusted to it by customers or suppliers, and for treating them accordingly.

The Company's assets include physical assets, such as equipment and buildings, as well as its funds, intellectual property, trade secrets and confidential information.

To protect ECC's assets, they must be adequately safeguarded. This means locking up and securing valuable assets. ECC's assets may not be sold, borrowed, lent, given away or modified in any way that would impact their value, unless there is a good business reason and with approval of the Executive Office.

#### ***Use of Company Resources***

Company resources, including but not limited to cash, personnel, equipment and vehicles may only be used for legitimate Company business purposes.

#### ***Confidential Information/Privacy***

##### ***Network Use, Integrity and Security***

Access to ECC systems will be revoked and disciplinary action may be taken in the event that such systems are used to commit illegal acts or to violate the non-discrimination, harassment, pornography, solicitation or proprietary information terms of this Code, or any other terms of this Code, consistent with applicable laws.

In order to maintain systems integrity and protect the Company network, no employee or Officer should divulge any passwords used to access any Company computer or database. Any suspected breach of the Company's network security systems should be reported to a responsible Manager or HR Officer immediately.

All employees and Officers should refrain from using or distributing software that may damage or disrupt the Company's work environment by transmitting a virus or anything conflicting with Company systems.

No employee or Officer should engage in the unauthorized use, copying, distribution or alteration of computer software whether obtained from outside sources or developed internally.

### ***Financial Interest in Other Business/es***

Employees should not have any direct or indirect financial interest in a customer, competitor or supplier's business that could cause divided loyalty or the appearance of divided loyalty. Once a year, employees are required to file a disclosure statement (form shown in attachment A) and make known to management all their present investments in companies that are or in the future may become its customer, competitor or supplier. A financial interest is improper if the combination of one's job, the amount of his investment, and the particular company he invested in could, if viewed objectively by another person, influence his actions as an employee. No employee should circumvent

these guidelines by acting indirectly through anyone else.

Employees must uphold the Company interest and not grant undue personal favors, especially in matters of awarding dealerships, contracts, or in hiring and similar activities. Each employee must exercise utmost discretion in accepting personal favors or gifts from individuals or entities seeking or doing business with the Company and refuse any gift that might be considered as bribery in any form.

### ***Moonlighting***

The Company expects its employees to devote their full time and attention to their commitment to the Company. Therefore, all employees are discouraged from maintaining outside employment. No employee shall engage in outside work or services for a customer, competitor or supplier under any circumstances. No employee may engage in any business activity at any time during his employment without the prior written approval of the President of the Company. Under no circumstances should an off-the-company employment by any employee reduce his efficiency, alertness, interest or productivity in his job with the Company. An employee must seek clearance from the Management prior to engaging in outside work or assuming simultaneous positions in other companies.

### ***Family and Relationships***

No employee may conduct official business with a family member or any closely related person. Nor can he conduct business with an organization whose officers and/or key contact persons are related to him by blood or marriage (up to the 3<sup>rd</sup> degree of consanguinity or affinity), or by any other relationship that could influence the conduct of business, without first seeking the approval of his superiors or the President of the Company.

There may be situations when the employee's spouse or other members of the employee's family may be working for a competitor or supplier. The closeness of the relationship might lead the employee to inadvertently compromise the Company's interests. The employee must be aware that this situation, however harmless it may appear, could arouse suspicions and/or might affect working relationships. To remove such doubts or suspicions, the employee shall file a disclosure statement and get approval from his superiors or the President; otherwise, the HRD shall have the option to file the necessary charges.

Consistent with the Company's outlook and approach on employee discipline, ECC lays the responsibility of disclosure of possible conflict of interest in the hands of its officers and employees. Any possible or actual conflict must be disclosed by the officer or employee involved to his or her immediate superior who will, in turn, review and resolve the conflict situation based on guidelines and in consultation with higher Management

## **IX. PROPRIETARY INFORMATION**

### ***"Respecting other People's Property."***

No employee and Officer of the Company who is entrusted with information of a confidential or proprietary nature (about the Company, its suppliers, customers or contractors) shall disclose that information outside of the Company, either during or after service with the Company, except with written authorization of the Company or as may be otherwise required by law. Employees and Officers must not use confidential information for their own personal benefit or the benefit of persons or entities outside of the Company. Confidential information includes all non-public information learned as an employee, consultant, Officer or Director of the Company.

The Company's trade secrets, proprietary information and such other internal information are its valuable assets. Employees must protect with zeal and caution confidential knowledge or data on products, business strategies, processes, systems or other important information during or even after employment with the Company. Protection of this information plays a vital role in the Company's continued growth.

A trade secret is treated as property which is usually in the form of information, knowledge or know-how, the possession of which gives the owner competitors. Thus, a trade secret is something that is not generally or publicly known. A secret,

however, need not be patented to qualify as a trade secret. Employees' obligations with respect to proprietary and trade secrets of the Company are:

1. Not to disclose any information to persons and entities outside of the Company such as visitors, suppliers, family, etc;
2. Not to use any information for employees' own benefit or for the profit or benefit of persons outside of the Company; and
3. Not to disclose any information to other employees except on a "need-to-know" basis, and only with a positive statement that the information is a Company trade secret. Employees who have a "need-to-know" are those who can do their jobs properly only with knowledge of the proprietary or trade secret information.

Any request for information shall be made in writing and shall be referred to the HRD. Approval of such request shall be made by the President

## **X. SOCIAL RESPONSIBILITY, TRANSPARENCY, AND CORPORATE GOVERNANCE**

### **Community Relations**

The Company recognizes that it has a responsibility not just to its employees but also to the communities where its business operates.

#### **Respect for Government and the Law**

While the Company works hard to achieve superior business results, it is committed to

conducting business in a lawful and responsible manner. All employees are expected and directed to comply with all laws and applicable regulations, and to conduct business in accordance with the highest standards of business ethics. It is every employee's responsibility to know and to understand legal and policy requirements as they apply for their job, and to notify Management when they believe a violation of law or Company policy has been committed.

### **Corporate Governance**

The Company is committed to good corporate government practices, specifically the principles of fairness, transparency, accountability, and responsibility.

### **Discipline is guided by the following principles and policies:**

- The most desirable discipline is self-discipline. Only when one is incapable of self-discipline this code is called to use. Thus, discipline must be imposed consistently.
- This code covers the behavior of all employees. There are no employees exempted.
- Rules should clearly state the standards of personal behavior and conduct as well as define the acts as forms of behavior prohibited and punishable. Corresponding penalties for each violation shall also be spelled out and defined.
- Due process must always be observed. Investigations and proceedings shall be

expeditious, transparent, and consistent with the requirements of law. Disciplinary action shall be imposed immediately upon judgment.

- Imposition of action and penalties are impersonal and are directed at the behavior rather than the individual. As a rule, it is the offense alone that shall be the measure of the penalty to be imposed.
- Every executive, manager and superior shall be held responsible and accountable for maintenance of discipline within his area of responsibility and among the employees within his supervision.
- The HRD must ensure consistent and fair application of this code.

#### **RESPECT FOR DUE PROCESS:**

Every employee is presumed innocent of misbehavior he is being called to account for until is proven otherwise.

To ensure that this right is protected, before any corrective action may be taken, the procedures as enumerated below must be followed:

Step 1: The employee is notified in writing regarding the alleged misbehavior;

Step 2: The employee is given reasonable time to explain his side.

Step 3: The facts of the alleged misbehavior are established through an objective investigation. The employee may bring somebody from the

Company or his own counsel to assist him during the investigation.

Step 4: Mitigating or aggravating circumstances shall be considered.

Step 5: Decision on the appropriate corrective action shall be rendered only after the misbehavior has been established by evidence.

#### **CIRCUMSTANCES AROUND BEHAVIORS**

The gravity of misbehavior is partially determined by the circumstances surrounding its commission.

##### **Aggravating Circumstances:**

The following circumstances increase the gravity of the misbehavior:

- Full knowledge of the consequence/s of his behavior;
  - Premeditated and planned act;
  - Repeated commission of similar behavior;
1. Use of superior force or elements of surprise when committing the act;
    - Conspiracy with other persons;
  2. Use of the advantages of his position in the Company; and
  3. Serious damage or injury to the Company or co-employees as a result of the behavior.

##### **Mitigating Circumstances:**

The following circumstances lessen the gravity of the misbehavior:

- Act of self-defense;
- Undue provocation by another person;
- Consistent long exemplary behavior in the past;
- Unintentional or spontaneous act;
- Simple negligence;
- Prompt admission of guilt and repentance; and
- Force majeure or calamity.

### **PROCEDURE IN THE CONDUCT OF INVESTIGATION**

In accordance with due process, the following steps must be observed in investigating an alleged misbehavior.

Step 1: When an employee is reported to have committed misbehavior, the immediate superior shall notify the employee to explain in writing within five (5) working days. Such notice from the immediate superior shall likewise be in writing.

Step 2: The employee shall submit his/her written explanation within the prescribed period.

Step 3: The superior shall immediately conduct an investigation to establish the facts within seven (7) working days.

Step 4: After a careful evaluation of the facts, the superior shall render his/her decision within three (3) working days from completion.

Step 5: Immediate superior shall inform the employee in writing of his/her findings and the

action taken within the same period. In case of termination or suspension of thirty (30) days or more, the concurrence of the Grievance Team is required.

### **List of Violations and Its Sanctions:**

2. Attendance and Working Hours
3. Job Performance
4. Work Relationship
5. Misconduct or Undesirable Behavior
6. Dishonesty
7. Offenses against Property
8. Disobedience to Law – Health, Safety and Security
9. Disturbing Peace and Order
10. Violation of Administrative Rules
11. Conflict of Interest
12. Commission of a Crime

Employee Number

Plant Unit

(EE Copy)

**ACKNOWLEDGMENT**

**(Employee and 201 Copy)**

I acknowledge receipt of the **EMPLOYEE HANDBOOK** (the Handbook) of Eagle Cement Corporation (the Company) and have likewise read and understood its contents. I hereby commit myself to comply with the terms contained therein which are the core purpose and values we strive to achieve and the policies which govern our activities.

I have likewise read and understood the Company's Employee Guide: Code of Discipline and I am fully aware that the Code is of the highest importance to the Company and that any violation of those stated therein and the spirit of the Code is a prima facie cause for my termination and other attendant claims for damages.

Furthermore, I shall surrender the Handbook to the Human Resources Officer or his/her duly authorized representative upon cessation of my employment with the Company.

Received by:

Date Received:

\_\_\_\_\_  
Signature over Printed Name

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**ACKNOWLEDGMENT**

**(Employee and 201 Copy)**

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Received by:

Date Received:

\_\_\_\_\_  
Signature over Printed Name

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Employee Number

Plant Unit

(ER Copy)

<b>ECC</b>					

*(If none, please state "NONE")*

**CONFLICT OF INTEREST STATEMENT OF COMPLIANCE**

**A. DISCLOSURE AND RESTRICTIONS**

I hereby acknowledge having understood Eagle Cement Corporation's (the Company) CODE OF ETHICS on CONFLICT OF INTEREST and wish to disclose the following list of TRANSACTIONS, AFFILIATIONS, VENTURES and PARTNERSHIPS, OUTSIDE OF MY EMPLOYMENT OR ACTIVITIES with the Company.

**A. Business Interest**

Outside Organization	Nature Of Business	Potential Conflict

**B. Close Relative (Up to third consanguinity/affinity and existing God Parent/God Child)**

Name	Relationship to Employee	Outside Organization	Nature of Business	Potential Conflict

**C. Declaration of Gifts (above Php 500 from customer, suppliers, contractors, managers and colleagues of ECC)**

Name of customer, suppliers, contractors, managers and colleagues of	Relationship to Employee	Nature of Business	Gift Description (money, in kind and/or item)	Date Given	Reason

I hereby confirm that I will disclose any CONFLICT OF INTEREST that may arise subsequently. In this connection, I hereby commit myself to abide by the following restrictions:

- I will not call or communicate to any employee of the Company any matter regarding the above disclosed entities, as listed, nor does use any indirect mean of communicating, which will purport to represent the interest of any of the above disclosed entities.
- I will not work in a department of the Company which has direct dealings with any of the above disclosed entities, in terms of purchases, services, credit and collection, and account management.
- I will hold myself responsible in notifying my immediate superior of any change in circumstances or situation that will be in conflict with Item 2 above.
- Should I work in a department that uses the goods and services of any of the above disclosed entities, I will refrain from involving myself in any transaction that will favorably influence the business of any of the above disclosed entities.
- I will not divulge any Company information, considered private and confidential, and which will put any of the above disclosed entities in an undue advantage over other suppliers, and can be considered detrimental to the best interest of the Company, such as but not limited to plans, budget, prices, costs, delivery, terms/mode of payment, timing, specs, preferences, and competitive sources.

\_\_\_\_\_  
FULL NAME (print)

\_\_\_\_\_  
SIGNATURE & DATE

\_\_\_\_\_  
POSITION/TITLE

**B. APPROVAL**

This is to certify that I have reviewed the Disclosure Statement of the above named employee and that I have discussed with



him/her the restrictions that he/she has to follow in accordance with the Company's Code of Ethics. The above named employee understands that violation of any of the restrictions as specified herein shall result to the application of the corresponding disciplinary action including dismissal.

\_\_\_\_\_  
IMMEDIATE SUPERIOR

\_\_\_\_\_  
HRD MANAGER

(EE Copy)

**CONFLICT OF INTEREST STATEMENT OF COMPLIANCE**

**A.DISCLOSURE AND RESTRICTIONS**

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Outside Organization	Nature Of Business	Potential Conflict

**E. Close Relative (Up to third consanguinity/affinity and existing God Parent/God Child)**

Name	Relationship to Employee	Outside Organization	Nature of Business	Potential Conflict

**F. Declaration of Gifts (above Php 500 from customer, suppliers, contractors, managers and colleagues of ECC)**

Name of customer, suppliers, contractors, managers and colleagues of ECC	Relationship to Employee	Nature of Business	Gift Description (money, in kind and/or item)	Date Given	Reason

*(If none, please state "NONE")*

I hereby confirm that I will disclose any CONFLICT OF INTEREST that may arise subsequently. In this connection, I hereby commit myself to abide by the following restrictions:

- I will not call or communicate to any employee of the Company any matter regarding the above disclosed entities, as listed, nor does use any indirect mean of communicating, which will purport to represent the interest of any of the above disclosed entities.
- I will not work in a department of the Company which has direct dealings with any of the above disclosed entities, in terms of purchases, services, credit and collection, and account management.
- I will hold myself responsible in notifying my immediate superior of any change in circumstances or situation that will be in conflict with Item 2 above.
- Should I work in a department that uses the goods and services of any of the above disclosed entities, I will refrain from involving myself in any transaction that will favorably influence the business of any of the above disclosed entities.
- I will not divulge any Company information, considered private and confidential, and which will put any of the above disclosed entities in an undue advantage over other suppliers, and can be considered detrimental to the best interest of the Company, such as but not limited to plans, budget, prices, costs, delivery, terms/mode of payment, timing, specs, preferences, and competitive sources.

\_\_\_\_\_  
FULL NAME (print)

\_\_\_\_\_  
SIGNATURE & DATE

\_\_\_\_\_  
POSITION/TITLE

**B. APPROVAL**

This is to certify that I have reviewed the Disclosure Statement of the above named employee and that I have discussed with him/her the restrictions that he/she has to follow in accordance with the Company's Code of Ethics. The above named employee understands that violation of any of the restrictions as specified herein shall result to the application of the corresponding disciplinary action including dismissal.

\_\_\_\_\_  
IMMEDIATE SUPERIOR

\_\_\_\_\_  
HRD MANAGER

(ER Copy)