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I. OBJECTIVE

This Employee Code of Conduct ("ECC") aims to:

1. Implement and enforce the Company's rules and regulations with consistency, uniformity and fairness;

2. Provide essential guidelines to promote orderly and efficient operation of Benguet Corporation and its subsidiaries ("BC"), as well as protect the rights of all employees and other stakeholders; and

3. Define the responsibilities and accountabilities of all BC employees, foster effective two-way communication, stimulate self-discipline, and respect, and give them opportunity to express their views on matters that concerns them and the organization.

II. SCOPE AND LIMITATION

1. The ECC shall cover all BC and subsidiaries/affiliates employees regardless of position and/or status of employment including Consultant, Retainer and Project-based employees.
2. The ECC is not intended to be comprehensive to cover all situations that may occur. For any offense that is not explicitly provided for in this Code, the Company reserves the right to invoke the provisions of the Labor Code and other pertinent laws in imposing disciplinary measures.

III. EXPECTED EMPLOYEE CONDUCT

A. Responsibility of Employees

These rules are established for employees' information, guidance, and protection. Ignorance of this Code and the Company's Rules and Regulations is not an acceptable excuse for violation thereof. It is each employee's responsibility to:

1. Know and be familiar with this Code and the Company's Rules and Regulations. It is the duty of the Human Resource and Administration to ensure that the employee is properly oriented of this Code and the Company Rules and Regulations **upon employment**;

2. Faithfully abide by this Code and the Company's Rules and Regulations;
3. In case of doubt on any provisions of this Code and the Company Rules and Regulations, he should consult with his Immediate Head or refer the same with the Human Resource and Administration;
4. Report to the Human Resources and Administration any information on any offense that is being, has been, or is about to be committed (**see Tables 3 & 4 below**).

B. Expected Behavior of Employees

Every employee is expected to:

1. Perform his duties and responsibilities regularly and satisfactorily according to the standard operating procedures set forth in the workplace and requirement of his job;

2. Perform his duties with utmost diligence and dedication;

3. Be guided by the highest degree of responsibility, accountability, honesty and integrity in dealing with others and with the Company, thus, contribute to the achievement of the Company's goals and objectives;

4. Act legally and in accordance with the conduct set forth in this Code to avoid risk and reputational damage to the Company;

5. Protect all confidential knowledge and information acquired during employment and maintain the confidentiality of the same even after employment with the Company;

6. Utilize the Company's property, funds, equipment, and time solely for the purpose of discharging his duties and responsibilities; and

7. Promote a healthy and safe environment by preventing and eliminating dangers to health, safety, and security whether in relation to himself, to others or to the Company.

C. Ethical Principles of Managers and Officers

Based on BC Corporate Governance Manual, Officers and Managers hold a position of trust and confidence, thus must act with utmost fairness and according to the highest moral principles, consciously and consistently. They are expected to:

1. Acknowledge that their role is to protect Company's business organization and work towards the attainment of its legitimate goals and objectives;
2. Avoid all abuses of executive power for personal gain, advantage or prestige;
3. Reveal facts to his superiors whenever his personal business or financial interest become involved with those of the Company;
4. Avoid conflicts of interest based on the principle that decision should be made in the interest of the business organization at all times, and should avoid personal biases to distort his judgment;
5. Be concerned with the personal circumstances of subordinates and treat them fairly and courteously, assuring them of their right as individuals;

6. Recognize that his subordinates have a right to information on matters affecting them, and make provision for its prompt communication, unless such is likely to undermine the security and efficiency of the business;
7. Before taking a final decision, fully evaluate the impact on employees, the community and environment of the business;
8. Cooperate with his colleagues and not attempt to secure personal advantages at their expense; and
9. Implement the intent and strict observance of this Code and to report any violation immediately.

IV. VIOLATION OF CODE

A. Committing Violation

The ECC is intended for all employees to follow a certain conduct in order to become exemplary models inside and outside the Company. Violations or offenses, therefore, shall be regarded as cause for disciplinary action, and may affect one's performance evaluation or employment, as the circumstances may warrant.

1. Reporting Responsibility

   Any employee can report misconduct or irregularity to the following authorities:

   1.1. Immediate Head or the Next Higher-Level Head of the concerned employee committing offense
   1.2. Human Resources
   1.3. Audit and/or Risk Head

2. Monitoring Responsibility

   HR shall be primarily responsible in monitoring all offenses of employees based on documented communication accorded to them and maintained in their respective 201 files. However, the Immediate Heads shall provide the necessary assistance to the Disciplinary Committee in matters that need their action about the employee and his offense.

B. Responsible Persons/Department/Committees

The parties responsible for investigation on offense committed by an employee, and deciding on the disciplinary measures to impose, are as follows:

1. Immediate Head

The Immediate Head shall be responsible for the following:

a. Gather information and prepare pertinent documents on circumstances surrounding the offense. Perform initial review of the case facts and submit his recommendation to HR;

b. Provide HR and members of the investigating committee with documentations of the offense and SHALL become a member of the committee;

c. Discuss with the employee of his offense, inform him of the investigation and of his defenses and/or rights and the possible imposition of disciplinary measures based on the provisions of the ECC;

d. Impose disciplinary actions on minor offenses within his authority (e.g. verbal and written warnings), and provide updates and copies of notices to HR; and

e. Elevate to the Investigation Committee all major offenses and with a probable penalty of suspension and termination.

2. Human Resource

HR shall be responsible for the following:

a. Assist in gathering information and in the initial review of facts and circumstances surrounding the offense. Prepare documentation for review of the Investigation Committee;

b. Provide inputs and recommendations to the Investigating Committee;

c. Issue Notice/s to Explain (NTE) and letters, upon instruction of the Investigating Committee, to erring employees as part of the investigation process for offenses with serious disciplinary actions (Suspension and Termination). Employees issued NTEs are given at least (5) calendar days to reply, otherwise this will be considered waiver of right to be heard and admission of his offense. In cases of abandonment of work, the written notice shall be served at the employee's last known address; and

d. Issue Final Notice of Disciplinary Action (NDA), upon approval of the Grievance Committee, to the offender after the case has been finally determined and decided.

3. **Legal**

   a. Legal may spearhead the administrative hearing and preparation of the case resolution which will serve as the minutes of the hearing to be signed by all the members of the Disciplinary Committee and Resource Persons;

   b. Provide legal opinion, applicable laws, rules, and regulations on matters related to the case at hand; and

   c. Handle all labor cases filed for and against the Company.

4. **Disciplinary Committee**

   For subsidiaries and sites, a Disciplinary Committee composed of Heads for HR, Legal and concerned Department Head (s) where the employee involved is based or is assigned, shall be responsible for the following:

a. Investigate cases from within the sites and subsidiaries except for fraud and major cases elevated to the Investigation Committee;

b. Conduct hearing and interview of employee concerned and other parties that may be involved in the case;

c. Initiate other actions needed in the investigation process including request of the Audit and/or Risk Offices to conduct audit on cases requiring independent review;

d. Accomplish Case Resolution (CR) to recommend disciplinary action to be imposed and corrective measures to avoid recurrence and improve controls;

e. Provide cases report and documentations to HR for filing and monitoring; and to Audit and/or Risk Offices involving fraud cases for control and risk review, monitoring and further improvement.

5. **Investigation Committee**

   CHQ based committee, composed of Heads for Legal, HR, Audit and Risk, and selected Heads (as may be required), shall be responsible for the following:

   a. Investigate escalated cases to CHQ and those cases involving fraud from sites and subsidiaries;

   b. Conduct hearings and interviews of employees concerned and other parties that may be involved in the case;

   c. Initiate other actions needed in the investigation process including requesting Audit and/or Risk Offices to conduct audit on fraud, or other serious cases;

d. Accomplish Case Resolution Report (CRR) addressed to the President or Resident Manager to recommend disciplinary measure to be imposed or corrective actions to avoid recurrence and improve controls;

e. Provide case report and documentation to HR for filing and monitoring, and/or to Audit and/or Risk Offices for control and risk review, monitoring and further improvement.

6. Audit and/or Risk Offices

Perform audit of escalated case/s on fraud and other major offenses as requested by the Investigation Committee;

a. Recommend actions to improve risk, governance, and control processes;

b. Monitor actions done on recommendations from the Audit and/or Risk Offices; and

c. Report to the Management and Audit Committee all cases and actions taken.

V. DISCIPLINARY MEASURES

A. Assessing Offenses

In assessing the offense or violation, the following should be taken into consideration:

a. Degree of offense – gravity, from Minor to Major offense

b. Number of times offense committed – frequency, from first up to fourth offense

B. Degree of Offense

The violation or offense is classified into the following categories:

Table 1. Degree of Offense

OFFENSE	DESCRIPTION
Minor Offense	• Unacceptable misconduct but not severe/major • Minor impact/risk to the Company. In determining the impact to the Company, Management may refer to the Risk Management framework definition of "Impact" • Lesser punishment but may lead to serious measures if not corrected or if done repeatedly • May be given up to 3 chances to improve
Major Offense	• Severe infraction (s) • Major impact/risk to the Company • Heavier penalty

OFFENSE	DESCRIPTION
	• May be given 1 chance only to correct/improve

1. Tables 7 and 8 below for the list of offenses that may be committed by an employee falling under the above categories. While the list itemizes all possible violations, it is not an exhaustive remedy of all violations that may occur.

2. Any particular offense not listed in the Table (but analogous to those provided for shall be subject to disciplinary action) does not mean that the violating employee cannot be charged with any disciplinary action. The responsible authority shall determine an offense that may correspond to the violation committed and subject it to the corresponding disciplinary measure.

C. Number of Offenses

Once validated as an offense, these are accumulated and monitored by HRA and the Immediate Head.

1. Each type of offense shall be treated and counted separately;

2. Number of offenses can range from 1 to 4 offenses for Minor offenses, and 1 to 2 for Major ones, with each offense having a corresponding penalty; and

3. Only disciplinary and adverse actions which became a matter of record in the employee's 201 files are considered as official records. Other actions not communicated to HR shall not be official and therefore not counted.

D. Types of Disciplinary Actions

A disciplinary action is issued to correct employee's behavior and to avoid future occurrence. It is intended to serve as a guide to discipline, to help ensure appropriateness of penalty in relation to the violation and consistency in implementation of disciplinary actions across the organization. Below are the measures that can be imposed to an employee committing an offense:

Table 2. Types of Disciplinary Actions

Level	Disciplinary Measure	Description
1	Verbal warning	This is a verbal caution given to an employee for having committed an infraction of a rule. It is a reminder to refrain from repeating the same offense in the future or receive a more severe penalty. This shall be documented in a prescribed form.
2	Written warning	This is a formal notice in writing with a warning for a more serious corrective action if the same offense is repeated.

Level	Disciplinary Measure	Description
3	Suspension	A disciplinary action for grave violation of the Company's rules and regulations where employee is sent on forced leave without pay and corresponding benefits. Suspension period depends on gravity of offense and mitigating circumstances present. It is imposed at 3, 5, 10, 15 and 30 working days after observing due process. Preventive suspension can be issued during the investigation process for cases involving fraud but should be done in accordance with requirements of the law. Maximum period of preventive suspension is 30 days. Preventive Suspension is not a disciplinary measure, but a measure intended to enable the disciplinary committee to investigate charges against the employee by preventing the latter from intimidating or in any way influencing witnesses against him, or the result of the investigation.
4	Dismissal	This is the permanent separation or termination of an employee from service for justifiable cause.

E. Considerations for Disciplinary Actions

1. The employee's past performance and disciplinary history.
2. Opportunity for constructive rehabilitation.
3. Degree of accountability/responsibility of the position being held.
4. The nature and consequences of the offense.

F. Application of Penalties

Tables 3 and 4 shows the list of offense with their corresponding disciplinary measure depending on the type of offense and the number of times committed.

1. Discipline must be enforced consistently and shall be applied uniformly to offenders similarly situated. The imposition shall be directed against the employee's wrongdoing, not against his person or personality.

2. Only one penalty shall be imposed on each offense. However, when a single act or omission constitute two or more infractions, the corrective action applicable to the most serious infraction or offense shall be imposed, while the lesser infraction or offense is deemed absorbed.

3. Any disciplinary measure imposed has **no prescriptive period** and shall be cumulative based on the number of offenses committed.

4. In addition to a management-initiated disciplinary action, an employee may also be subjected to civil and/or criminal action and related prosecution when there is evidence of a possible statutory or legal violation. Such shall be referred to Legal Department for proper action.

5. For other offenses not covered in this Code, the Company reserves the right to invoke the provisions of the Labor Code and other pertinent laws/rules in imposing disciplinary measures.

G. Investigation and Due Process

Investigating parties must exercise reasonable judgment and consider all relevant factors in determining the most appropriate corrective action for each situation or case. Due process shall be observed at all times including, but not limited to, the following:

1. Informing the employee of his offense and rights;

2. Gathering of facts and documentary evidence to support the charges;

3. Issuing Notice-To-Explain and other related communications/documentation;

4. Conducting hearings and interviews and sufficient investigation.

5. Maintaining confidentiality of the case to the extent possible, given the legitimate needs of the law and fact-finding process;

6. Considering relevant aggravating and mitigating circumstances of the case;

7. Deciding on the case within reasonable time;

8. Opening for appeal and exhaustion of remedies available to the offending employee; and

9. Other actions in observance of fairness and transparency.

H. Charged Employees' Rights

The following due processes be accorded to all employees:

1. Right to be informed of his violation/offense;

2. Opportunity to answer and defend himself on violation raised against him; and with the assistance of a representative, if he so desires;

3. Right to know the corresponding disciplinary measures to be meted within reasonable time

4. Allowed full recourse to the established appeal procedures; and

5. Others as provided by the law.

I. Waiver of Rights

Intentional failure of the employee concerned to exercise the rights provided to him in this Code of Conduct shall mean waiving his rights to be accorded due process and can be assumed as indirect admission to the offense.

J. Reasonable Time

The Company shall use all reasonable means to resolve all offenses speedily and objectively in the interest of due process.

1. All cases shall be decided within a period of 5 working days for minor offense; and

2. A longer period of time may be needed for major offenses requiring thorough investigation and audit but not to exceed one (1) month, or in cases involving fraud, not to exceed six (6) months.

K. Notice of Final Decision

After a thorough investigation of the case at hand, the investigating officer shall decide and shall issue a final Disciplinary Action Form (DAF) to the erring employee which shall contain, but shall not be limited to the following information:

1. Facts of the case as gathered from the investigation;

2. Summary of offenses committed by the employee constituting grounds for charges and disciplinary measure;

3. Supporting documents and details validating the offense; and

4. Appropriate disciplinary action and the effective date and/or duration should the employee be found guilty.

L. Documentation

Proper documentation and approval shall be observed in handling cases on employee code of conduct violations.

1. All proceedings relative to the investigation shall be documented and all participants to the preparation shall sign all related documents. These documents

and related facts shall be the basis for any decision on the prescribed disciplinary measure.

2. All documents sent and received in the case proceedings shall be duly acknowledged by the recipients indicating printed name, signature, and date.

3. All documentations shall be preserved and maintained based on the applicable documentation handling policies including prescriptive period to be observed.

4. Responsible parties to the case shall ensure all documentations are approved and filed in the corresponding case folders for future reference.

M. Approvals

The following approving authorities must be observed:

1. Notice to Explain (NTE) – Department Manager or HR, Resident Manager for Department Managers.

2. Case Resolution by the Disciplinary or Investigation (Grievance) Committee – all members should sign the resolution or the minutes of the Administrative Hearing meeting.

3. Notice of Disciplinary Action (NDA) – Immediate Head for penalty 1 and 2; Resident Manager or President for penalty 3 and 4.

4. Decision – Resident Manager for mine sites or the President for CHQ.

N. Appeal

The Company provides an appeal process to govern the fair and equitable application of this Code and to ensure that everyone is accorded due process.

1. An employee who feels aggrieved or unjustly treated may course his appeal through the proper channels.

2. A review of the case shall be conducted within a week after the appeal date by the investigating party and a final decision be reached and recommended based on mitigating circumstances that may be present and given weight.

3. Approval of an appeal commuting the disciplinary action meted to a lesser penalty are considered only on a case-to-case basis. It shall be decided taking into account previous cases of similar nature but avoiding setting a precedence.

O. Provision Interpretation

HR shall be consulted regarding the consistency of rule interpretation and appropriateness of the offense and penalty being applied for violation of any of the rules of conduct and discipline. Any changes shall be coursed through the Policy and Procedure Committee (PPC) for clarification subject to the approval of the President as endorsed by the PPC members. Reference shall also be made to applicable and related policies available such as *Anti-Fraud and Whistleblowing, Corporate Governance Manual, policies on Data Privacy, Related Party Transaction, and Safety Manual.*

P. Whistle-blowing Mechanism

The Company encourages its employees to communicate in high confidentiality and without risk of reprisal any legitimate concern about perceived offenses committed, to be committed, or being committed by employees inconsistent with the Corporate Values and Codes of Conduct/Ethics set by the Management and Board. Whistleblowing related to offenses shall be reported in accordance with the related Policy on Anti-Fraud and Whistleblowing.

Q. Disciplinary Measures for Minor Offenses

Below are the list of minor offenses and their corresponding disciplinary measures depending on the number of times committed:

Table 3. Minor Offense

MINOR OFFENSE	DISCIPLINARY ACTION			
	First Offense	Second Offense	Third Offense	Fourth Offense
I. BUSINESS/TRADE ENGAGEMENT:				
1. Promoting, engaging in or practicing usury.	2	3	4	-
2. Engaging in personal business or part-time work during office hours.	2	3	4	-
3. Collecting monetary contribution for any purpose from anyone within the company premises without authority from the management.	1	2	3	4
II. PERSONAL BEHAVIOR/CONDUCT/AND JOB PERFORMANCE				
1. Absence without leave (AWOL) or prior notification or valid reason.	1	2	3	4

MINOR OFFENSE	DISCIPLINARY ACTION			
	First Offense	Second Offense	Third Offense	Fourth Offense
2. Violation of the break time and lunch schedules.	1	2	3	4
3. Habitual tardiness without reasonable cause. 1- to 6th – Verbal Warning 7th to 15th-Written Warning 16th to 19th- 3 days Suspension 20th to 25th- 5 days Suspension 26th to 30th - 10 days Suspension 31st to 40th-15 days Suspension 41st to 45th -30 days Suspension 46th tardiness - Dismissal				
4. Loafing, loitering, or leaving his place of assignment or Company premises during work hours without permission and approval from immediate head and for unjustifiable reasons.	2	3	4	
5. Quitting work before time-off without permission/approval and for unjustifiable reasons.	2	3	4	
6. Failure to notify the office for absence by reason of sickness.	1	2	3	4
7. Reading irrelevant books, magazines, novels, or other printed materials not related to one's work while on duty.	1	2	3	4
8. Opening, accessing, or browsing any social networking site, unofficial e-mail or other similar website.	1	2	3	4
9. Downloading of non-work-related file, system, application, games etc. from the internet.	1	2	3	4
10. Creation of social media accounts and posting of pictures, comments and other materials relating to Company operations, employees, and activities without proper authorization.	2	3	4	

MINOR OFFENSE	DISCIPLINARY ACTION			
	First Offense	Second Offense	Third Offense	Fourth Offense
11. Failure to provide guidance by superior to subordinate, or failure to clarify by subordinate with superior in discharge of their duties and responsibilities, resulting to violation of company policies or existing laws.	2	3	4	
12. Bickering, petty rivalries, gossiping and/or injuring the reputation of others by false statement.	1	2	3	4
13. Holding of unauthorized meetings or sessions within the company premises.	1	2	3	4
14. Wastage of company supplies and materials.	1	2	3	4
15. Unauthorized use of company vehicle and/or equipment - If such unauthorized use causes minor damage or loss to the company. - If such unauthorized use causes damage amounting to not more than Php 100,000.00.	1 2	2 3	3 4	4 -
16. Removing company property from its designated place and placing the same in another place within the premises without proper written authorization from the management and for unjustifiable reasons.	2	3	4	-
17. Intentional substitution or attempt to replace Company material or equipment with another of inferior quality or lesser value for the purpose of defrauding the Company.	2	3	4	-
18. Unauthorized use or possession of Company properties such as vehicles, equipment, and materials for purposes other than the discharge of duties and responsibilities.	2	3	4	-
19. Damaging, defacing, tampering, or destroying Company property or that of another employee, including vandalism or graffiti - If cost of damage is less than or amounting to Php 100,000.00	2	3	4	-

MINOR OFFENSE	DISCIPLINARY ACTION			
	First Offense	Second Offense	Third Offense	Fourth Offense
20. Usage of Company properties in a manner other than that provided in the standard operating procedures.	2	3	4	
21. Recklessness or blatant negligence resulting in potential damage to or loss of Company property.	2	3	4	-
22. Driving company vehicle without the necessary government issued driver's license or with an expired driver's license.	2	3	4	-
23. Unauthorized and improper use of the company ID card.	2	3	4	
24. Conspiring with co-employees, suppliers, contractors, sub-contractors, and other stakeholders in the distribution or interruption of the Company's water and electric supply system.	2	3	4	
25. Participating, engaging, or indulging in horseplay, running, scuffing, or throwing objects within company premises during company time or company business or affairs.	2	3	4	-
26. Harboring any unauthorized person in company-owned structures or residential facilities.	2	3	4	-
III. SAFETY, HEALTH, SECURITY, ENVIRONMENT, CAMP RULES AND PUBLIC ORDER				
A. SAFETY				
1. Failure to observe the standard safety protocols when riding or driving/operating Company vehicles.	1	2	3	4
2. Using, removing or tampering fire protection equipment for a purpose other than fire-fighting.	4	-	-	-
3. Smoking in areas within the company premises where it is prohibited.	1	2	3	4

MINOR OFFENSE	DISCIPLINARY ACTION			
	First Offense	Second Offense	Third Offense	Fourth Offense
4. Failure to wear prescribed uniform/personal protective equipment and failure to observe the necessary safety precautions while in the performance of his duties and responsibilities.	1	2	3	4
5. Failure to immediately report a personal injury or accident while in the performance of his/her duties and responsibilities.	2	3	4	-
B. HEALTH				
1. Unjustifiable refusal to abide by the order to undergo annual physical examinations or physical check-up within the prescribed period.	2	3	4	-
C. SECURITY				
1. Failure or refusal to wear the identification (ID) card upon entering and while inside the Company premises.	1	2	3	4
2. Refusal to submit himself for authorized security check.	1	2	3	4
3. Entering any restricted area without prior authorization from the relevant official or assisting any person to gain unauthorized entry to any restricted area within Company premises.	1	2	3	4
D. ENVIRONMENT				
1. Acts contributing to unsanitary conditions or poor housekeeping including indiscriminate spitting on the floor and littering within the workplace.	1	2	3	4
2. Violation of environmental rules and regulations of the Company.	2	3	4	-
3. Dumping of solid wastes and liquid contaminants or toxic waste to any body of water within company premises thereby causing health risks to others.	1	2	3	4

R. Disciplinary Measures for Major Offenses

Below are the list of major offenses and their corresponding disciplinary measures depending on the number of times committed:

Table 4. Major Offense

MAJOR OFFENSE	DISCIPLINARY ACTION			
	First Offense	Second Offense	Third Offense	Fourth Offense
I. PERSONAL BEHAVIOR/CONDUCT AND PERFORMANCE				
1. Unauthorized use of company vehicle and/or equipment, when the loss or damage is amounting to more than Php 100, 000.00 or when the loss or damage thereof causes partial or temporary stoppage of Company operation;	4			
2. Intentionally damaging, defacing, tampering, or destroying Company property or that of another employee, including vandalism or graffiti when the cost of loss or damage is amounting to more than Php 100, 000.00 or when the loss or damage greatly affects Company operation.	4			
3. Irresponsible, improper, incorrect, or negligent use, operation or handling of Company tools, equipment, facilities, or property when the deviation caused loss or damage amounting to Php 100, 000.00 and above or injury to another person.	3	4		
4. Loss or misplacement of Company properties, assets, and equipment under his custody due to recklessness or negligence.	3	4		
5. Failure to report the loss or damage of any Company property within his tour of duty. By not reporting the incident, the Company may suffer loss or damage or may cause injury to another person.	3	4		
6. Unauthorized alteration made on one's time/attendance record or that of another, intentional destruction, removal, and concealment thereof including timing in/out for another employee;	4			

MAJOR OFFENSE	DISCIPLINARY ACTION			
	First Offense	Second Offense	Third Offense	Fourth Offense
7. Uttering profanities, disrespectful language or displaying obscene acts towards a co-worker, superior, company officer or any visitor of the company.	3	4		
8. Damaging or injuring the reputation and image of the company in the eyes of the public.	3	4		
9. Installation of unauthorized computer software in any of the company's computer, laptop, and other devices. Use, operation, and other similar acts of unauthorized, unlicensed, or pirated computer software in company's computer, laptop or other services.	3	4		
10. Hacking company systems and database.	4			
11. Intentionally inflicting company systems and database with virus and other types of malwares.	4			
12. Commission of any subversive acts, including the distribution of subversive materials within the company premises.	4			
13. Damage to company properties due to abuse, deliberate act, or deviation from standard operating procedures.	4			
14. Unauthorized use or possession of Company properties resulting to damages to other Company property, injury, or death.	4			
15. Engaging or conniving in anomalous transactions involving company properties or that of another employee that produces results prejudicial to the Company's interest.	4			
16. Inflicting damage to the Company for failure or refusal to report in writing the loss of company property under his custody or accountability within 24 hours.	4			

MAJOR OFFENSE	DISCIPLINARY ACTION			
	First Offense	Second Offense	Third Offense	Fourth Offense
17. Such other fraudulent acts that may result to damages or disrepute against Company's interest in accordance with the defined laws, rules and regulations.	4			
18. Participating engaging or indulging in horseplay, running, scuffing, or throwing objects within company premises during company time or company business or affairs. - If any of the above acts results to loss of life or limb of another person or damage other property.	4			
II. BUSINESS / TRADE ENGAGEMENT AND OTHER FRAUDULENT ACTS				
1. Acceptance of bribe or bribing in any form such as money, gifts or presents in consideration of favors extended to suppliers, creditors, fellow employees and others where in the absence of such consideration, the favor could have been denied for the greater interest of the Company.	4	-	-	-
2. Committing acts of dishonesty, deceit or anomaly not embraced by other provisions which cause damage or loss to company property or to fellow employees such as: a. Making a false or fraudulent claim against the company; b. Initiating or participating in any action intended to defraud the company; and c. Obtaining payment benefit or gain from the company to which is he is not entitled.	4	-	-	-

MAJOR OFFENSE	DISCIPLINARY ACTION			
	First Offense	Second Offense	Third Offense	Fourth Offense
3. Conflict of interest on the following, but not limited to (refer to legal and Anti-Fraud Policy definition): a. Engaging directly or indirectly, in any enterprise whose business is in direct competition with the Company; b. Outside employment, directorship, officership, partnership, consultancy, distributorship, or agency in any company which adversely affects his working efficiency or productivity; c. Having a spouse or relative within the fourth degree of consanguinity or affinity with individuals employed by a competitor or business partner; and d. Failure to divulge involvement in any conflict of interest with the company.	4	-	-	-
4. Extortion, directly or indirectly demanding, requesting, soliciting any commission, share or consideration, monetary or otherwise, for himself or another person, in connection with any contract or transaction entered into by the company.	4	-	-	-
5. Falsification of records or documents or making false statements such as but not limited to: a. Furnishing false data or documents; b. Willful withholding of vital information during an investigation; c. Misrepresentation of data stated in the application form or other official documents; d. Forging or unauthorized use of signatures of other employees for any purpose; and e. Perjury or making untruthful sworn statements or giving false testimony on a matter subject of official inquiry or investigation by the company. f. Payroll padding	4	-	-	-

MAJOR OFFENSE	DISCIPLINARY ACTION			
	First Offense	Second Offense	Third Offense	Fourth Offense
6. Theft/Stealing, pilferage, and misappropriation, or attempting to steal company funds or property including company products, materials, supplies, company-owned software or stealing from co-employees.	4	-	-	-
7. Unauthorized, willful divulging or releasing, disclosure of Company's data, information, trade secrets or other matters classified as confidential to outsiders and/or unauthorized parties.	4	-	-	-
8. Misappropriation of company funds, supplies, material, or equipment.	4	-	-	-

9. Theft of Minerals to include but not limited to the following: a. Concealing of high-grade ores in his person, tools, equipment or other paraphernalia. b. Attempting to conceal a high-grade ore or recovering a previously concealed one or disposing the same in a manner that will defraud the Company. c. Is present in a location known to have high grade when routine work does not require the presence of the miner in that location. d. Is breaking up ore and segregating the same to the detriment of the Company; (It is normal for a miner to break ore into smaller pieces to be contained in a sack but segregating selected ore with visible free gold from it is not consistent with his work.) e. Carries or attempts to carry gold ore out of the working area or the mine thru other passage not authorized by management or there are acts or omission that he is evading/deceiving the sharing system of the company. f. Possession of mercury *(quicksilver)* while on Company premises when possession of the same is not necessary in the discharge of his duties and responsibilities; g. Possession of highgrading paraphernalias such as but not limited to: refining ore such as moil," gusgusan", sluicing paraphernalia/cloth at the underground or surface premises and/or within BC and subsidiaries' area of operation. h. When there is reasonable ground to believe that he has concealed in his person gold amalgam/gold particles, and he refused to undergo thorough physical inspection. i. Acting as guard or look out while high-grading activity is being committed under the	4	-	-	-

MAJOR OFFENSE	DISCIPLINARY ACTION			
	First Offense	Second Offense	Third Offense	Fourth Offense
circumstances showing that he has knowledge thereof.				
10. Breach of trust and confidence.	4	-	-	-
11. Allowing unauthorized person to use or possess any piece of Company equipment, materials, and property for whatever purpose. - If deviation causes major damage amounting to Php 100, 000.00 and above or injury to another person.	4			
12. Unauthorized reproduction of confidential company records and documents for purpose inimical to Company's interest.	4			
13. Losing or misplacing company records which prejudices the Company's business or interest.	4			
14. Committing any act with malicious intent to cause damage to Company property or to property of others, or any attempt to cause such damage.	4			
15. Threatening bodily harm to a co-worker, superior, company officer or visitor.	3	4		
16. Discourtesy to visitors by being disrespectful, uttering obscene and foul language towards them. Also includes rude manner of dealing with the visitors, customers or guests of the company resulting in verbal or written complaint.	3	4		
17. Gross or intentional endangerment of the safety of self or another person.	4			
18. Driving or operating a company vehicle equipment without proper authorization.	4			
19. Driving or operating a company vehicle or equipment under the influence of liquor or prohibited drugs.	4			
20. Refusal of an employee to undergo alcohol testing.	4			
21. Smoking in hazardous areas.	4			

MAJOR OFFENSE	DISCIPLINARY ACTION			
	First Offense	Second Offense	Third Offense	Fourth Offense
22. Unauthorized carriage, possession or use of explosives, firearms, bladed or lethal weapons within Company premises or during working hours.	4			
23. Failure to disclose to the Company the existence of serious contagious disease which may endanger the health of another employees.	4			
24. Not reporting to the Company clinic or designated hospital when instructed to do so by management or authorized company official after sound determination that an employee is found to be inflicted with an illness or contagious disease that will affect the safety and health of his co-workers.	4			
25. Failure and improper usage of the required safety devices or protective equipment. - If act results to loss of life or limb of another person or damage to property.	4			
26. Inflicting bodily harm to co-worker, superior, company officer or visitor.	4			
27. Provoking a fight against co-worker, superior, company officer or visitor.	4			
28. Engaging in brawl, mauling, fist cuff or any physical fight with another within the company premises.	4			
29. Serious case of harassment, bullying, or discrimination.	4			

MAJOR OFFENSE	DISCIPLINARY ACTION			
	First Offense	Second Offense	Third Offense	Fourth Offense
30. Any employee having authority, influence or moral ascendancy over a subordinate, co-employee, agent or other person, who shall demand, request or otherwise require any sexual favor from such other person, regardless of whether the demands, request, or requirements is accepted such other person under the following circumstance:	4			
a. When sexual favor is made as a condition in the hiring, or in the employment or continued employment, or the engagement, of the services of such other person;	4			
b. When the sexual favor is made as condition in the granting of favorable compensation, contractual, feels, terms, condition, promotions or privileges;	4			
c. When refusal to grant the sexual favor results in the limiting, segregating, or classifying of the employee, agent, or such other person, which in any way would discriminate, deprive, or diminish employment or contract opportunities, or otherwise adversely affect such other person.	4			
d. When any of the above acts would impair the employee's rights or privileges under existing labor law; or	4			
e. When any of the acts or any other inappropriate body contact would result in an intimidating hostile, or offensive environment for the employee.				
31. Engaging in scandalous relationship as maintaining relationship with another employee when being validly married.	4			
32. Having sexual intercourse within company premises.	4			
33. Exhibitionism	4			

MAJOR OFFENSE	DISCIPLINARY ACTION			
	First Offense	Second Offense	Third Offense	Fourth Offense
34. Commission of crime involving moral turpitude such as seduction, rape, abduction, and acts of lasciviousness.	4			
35. Conviction of a crime where the penalty imposed is more than thirty (30) days of imprisonment.	4			
36. Accepting, directly or indirectly, bribes in exchange for any favors connected with the discharge of the employee's official duties.	4			
37. Participating in illegal mining activities, including panning and small-scale mining either within Company's tenement area and/or in the employee's personal property as ruled by the appropriate regulatory agency.	4			
38. Participation in theft of minerals within or outside the Company's tenement areas.	4			
39. Willful violation of this Code of Conduct.	4			
40. Incompetence or neglect of duties.	3	4	-	-
41. Insubordination which exposes the company to unnecessary risks. Below are some instances: a. Refusal to perform services connected with the Company; b. Refusal to obey any reasonable order given by the Immediate Head or by the Management; c. Willful disobedience to superior; and d. Refusal and failure to cooperate or withholding to provide team support when such is needed to ensure performance of company operations or protect its interest.	3	4	-	-
42. Intentional slowdown in work, restricting output or deliberate delaying of project evaluation.	3	4	-	-

MAJOR OFFENSE	DISCIPLINARY ACTION			
	First Offense	Second Offense	Third Offense	Fourth Offense
43. Knowingly altering employee's time IN/OUT or time IN/OUT of another employee.	3	4	-	-
44. Negligence, failure to observe the degree of diligence demanded by the duties and situation, thereby exposing the Company to unnecessary risks.	3	4	-	-
45. Insubordination, failure, or refusal to follow verbal or written job instruction, standard operation procedures, where there is damage or loss to the Company or its employees as a result of such refusal.	4	-	-	-
46. Abuse of authority taking undue advantage of power or authority to gain undue favors or advantage for oneself or to oppress, harass, and otherwise prejudice another.	4	-	-	-
47. Gross inefficiency or negligence in the performance of duties causing the Company great/enormous loss or damage.	4	-	-	-
48. Sleeping during working hours where Company property is damaged, or loss is incurred.	4	-	-	-
49. Abandonment of work or absence from work without authorized leaves for more than seven (7) consecutive days and the employee still fails to report upon receipt of notice of abandonment.	4	-	-	-
III. JOB PERFORMANCE / PERSONAL BEHAVIOR/CONDUCT:				
1. Disorderly conduct that may distract others from the performance of their duties and functions.	3	4	-	-
2. Disrespect, discourtesy, insult or use of foul language toward a fellow employee, immediate Head, Manager or Officer of the Company.	3	4	-	-
3. Sending, sharing, and showing pornographic materials, pictures, or literatures during Company time or in the Company premises.	3	4	-	-

MAJOR OFFENSE	DISCIPLINARY ACTION			
	First Offense	Second Offense	Third Offense	Fourth Offense
4. Bringing, buying, selling, using or being under the influence of prohibited drugs while inside the Company premises.	4	-	-	-
5. Gambling in any form including participating in any game of chance at any time within the company premises.	4	-	-	-
6. Immoral conduct or indecent acts, lascivious behavior, sexual activities carried out within the Company premises, sexual harassment, acts of lasciviousness, as defined in the revised penal code (see Policy on sexual harassment).	4	-	-	-
7. Act constituting threats, intimidation, or coercion against an employee or in a manner unduly interfering with fellow employee, third party personnel or visitors	3	4	-	-
IV. SAFETY, HEALTH, SECURITY, ENVIRONMENT, CAMP RULES & REGULATIONS				
1. Drinking or being under the influence of liquor, alcoholic or intoxicating beverages while inside the Company premises or bringing such alcoholic beverages without permission from authorized personnel (this offense is not applicable in case there are Company occasions/activities where drinking alcoholic beverages is allowed).	4	-	-	-
2. Creating or contributing to public disturbance or otherwise engaging in scandalous behavior or notoriously disgraceful conduct within Company premises.	3	4		
3. Willfully refusing to submit to the security requirements of the company despite due notice.	3	4		
4. Violation of environmental rules and regulations of the Company. - If violation or acts results to major damage and/or penalty for regulatory agencies.	4			

MAJOR OFFENSE	DISCIPLINARY ACTION			
	First Offense	Second Offense	Third Offense	Fourth Offense
5. While not being an instigator or a victim, joining a brawl, mauling, fisticuffs or any physical fight with another employee or another within the company premises.	3	4		
6. Deliberate setting of any types of fire.	3	4	-	-
- In case of arson or if violation results to destruction of Company property, death of or injury to person.	4	-	-	-
7. Failure to report loss, incident or occurrence, including injury, or accident to an employee and/or Company property.	3	4	-	-
- If violation results to destruction of Company property, injury to or death of a person.	4	-	-	-

MAJOR OFFENSE	DISCIPLINARY ACTION			
	First Offense	Second Offense	Third Offense	Fourth Offense
8. Failure to observe safety rules and regulations, such as: a. Riding on bumpers between moving cars b. Unauthorized riding of trains and/or motors c. Getting on and off locomotive while the latter is in motion d. Making flying switches e. Doing electrical repairs when not authorized f. Not using safety ropes/belts when required g. Dropping tools and other equipment through chutes or manways h. Not wearing Personal Protective Equipment (PPE) such as safety shoes, hard hats, goggles, among others, where these are required in the performance of duties. i. Not blowing air before entering abandoned or old working places	3	4	-	-
- If violation results to destruction of Company property, injury to or death of person.	4	-	-	-
9. Failure to undertake barring down or install proper support in his workplace.	3	4	-	-
- If violation results to destruction of Company property, injury to or death of person.	4	-	-	-

MAJOR OFFENSE	DISCIPLINARY ACTION			
	First Offense	Second Offense	Third Offense	Fourth Offense
10. Improper drilling and handling of authorized explosives such as: a. Drilling into or around misfires and/or bootlegs b. Improper/not guarding entrance/exits during blasting c. Smoking while carrying/charging explosives d. Cutting fuses below standard e. Not using fuse timers when required	3	4	-	-
- If violation results to destruction of Company property, injury to or death of person.	4	-	-	-
11. Smoking within "No Smoking" area.	3	4	-	-
- If violation results in fire or damages to Company property, injury to or death of person.	4	-	-	-
12. Unauthorized installation and alteration of electrical connections in housing areas and/or industrial areas.	3	4	-	-
- If violation results to destruction of Company property, or injury to or death of person.	4	-	-	-
13. Act of violence committed by any person or any attempt to inflict bodily injury or harm on any person within the Company premises or during an official activity, provoking or instigating a fight within the Company premises.	4	-	-	-
14. Committing a grave felony against any person in or within Company premises.	4	-	-	-
15. Convicted by court of criminal offense/crime.	4	-	-	-
16. Driving under the influence of liquor or drugs.	4	-	-	-

MAJOR OFFENSE	DISCIPLINARY ACTION			
	First Offense	Second Offense	Third Offense	Fourth Offense
17. Encouraging, coercing, inciting, bribing or other acts tantamount to inducing any employee to commit any violation of the Company's rules and regulations or willfully assisting other parties to sabotage or prejudice Company interest.	4	-	-	-
18. Fighting, quarreling, creating trouble, disturbing peace, and creating undue disturbances resulting in apprehension among fellow employees within the Company premises.	4	-	-	-
19. Initiates or threatens to initiate retaliation in any form or way against an individual who reports a serious concern or participates in an investigation related to the serious concern.	4	-	-	-
20. Possession of firearms, fireworks, or explosives on Company property without permission from the Management.	4	-	-	-
21. Violations of Safety Rules and Regulations of the Company - If the violation or acts results to loss of life or limb of another person or damage to property	4	-	-	-

V. GUIDELINES AND PROCEDURE

A. Reporting an Offense

Table 5. Reporting an Offense

Responsible	Procedure	Guidelines
Reporting Employee or Whistleblower	1. Reports offense to the Immediate Head, Human Resource & Admin (HRA) or Audit and/or Risk verbally or in writing. *Note: If Immediate Head is the one who noted the offense, proceed to no. 3.*	
HR/Authorized Head/Audit/Risk	2. Reviews violation reported and refers to Immediate Head of the employee committing an offense in writing, along with any evidence submitted. 3. Prepares and issues NTE in 2 copies and have them signed by the Resident Manager (sites) or the President (subsidiary and CHQ) or Disciplinary	- Ensures that all the documentation and proceedings are complied with based on the minimum requirement of the law. - All documents are filed in employee's 201 file for future reference. - Puts in place an orderly monitoring system to account for number of offenses of employees committing offenses.
Employee Concerned	4. Receives NDA or NTE from Immediate Head or HR by signing the document. 5. Airs his side or replies on the charge against him through NTE by submitting explanation letter or during the administrative hearing or any means of communication.	- Improves on minor offenses committed and serves with penalty.

Responsible	Procedure	Guidelines
Audit/Risk or Authorized Manager	6. If the case needs further investigation, the Investigation Committee conducts thorough investigation. 7. For Fraud and Significant Cases, request Investigation Committee or Audit and Risk to conduct audit report or further investigation providing all the documents and facts received about the case.	
Investigation/ Audit Head	8. Receives and reviews request to do audit or conduct further investigation treating it as priority task. 9. Prepares report after review and provides copy to investigating committee aside from the President and Audit Committee Head.	
HR	10. Issues Notice of Admin Hearing	

Responsible	Procedure	Guidelines
Disciplinary/ Investigation Committee	11. Evaluates and analyzes all received reports (NTE replies, audit reports and others as required) and gathered facts, data, information and evidence. All discussed matters must be documented in minutes of comittee meetings. 12. Conducts hearings involving the concerned employee and other employees needed or involved to gather more information relevant for the investigation. 13. Prepares Recommendation Report (RR) in 3 copies summarizing the case and indicating recommended disciplinary action to the employee concerned based on the ECC and applicable laws and policies. 14. Submits RR and case folder to the Resident Manager or President, as applicable. The report should be signed by all the members of the comittee.	
Resident Manager/ President	15. Reviews the RR and provides his comments and approval. 16. Submits approved RR and case folder to HRA for implementation.	

Responsible	Procedure	Guidelines
HRA Head/ Authorized Manager	17. Receives RR and case folder and prepares NDA in 3 copies. Submits to Resident Manager or President for approval. 18. Issues approved NDA to Immediate Head for serving to Employee(s). Distributes RR to – Original for Committee, 2nd for HRA and 3rd for Immediate Head. Returns case folder to committee investigating.	
Immediate Head	19. Receives NDA and RR. Serves NDA to employee concerned. 20. If needed, discusses the disciplinary action decided. Requests the employee to perform work and/or file turnover to another employee. 21. Have the employee acknowledge the NDA and serve original to him, returns 2nd copy to HRA and files the 3rd copy. 22. Performs other required steps necessary for smooth transition of tasks/job. Coordinates with HRA for the proper turnover proceedings including clearances and salary concerns.	
Employee Concerned	23. Receives the NDA and serves the disciplinary action imposed. 24. Prepares for required turnover of works and files, as instructed by the Immediate Head and HRA.	

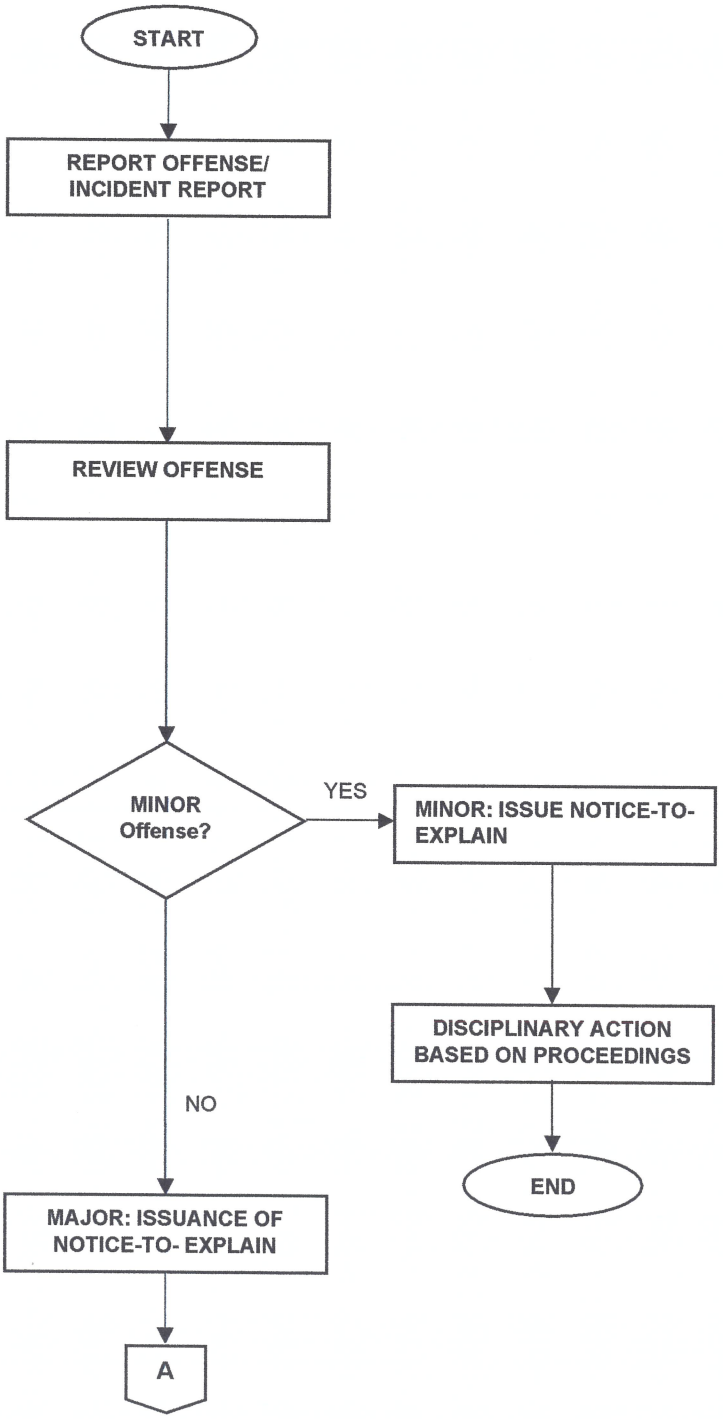
Responsible	Procedure	Guidelines
HRA Head/ Authorized Manager	25. Receives and files signed NDA in employee's 201 files. 26. If Termination, coordinates with Immediate Head on turnover and clearance procedures.	

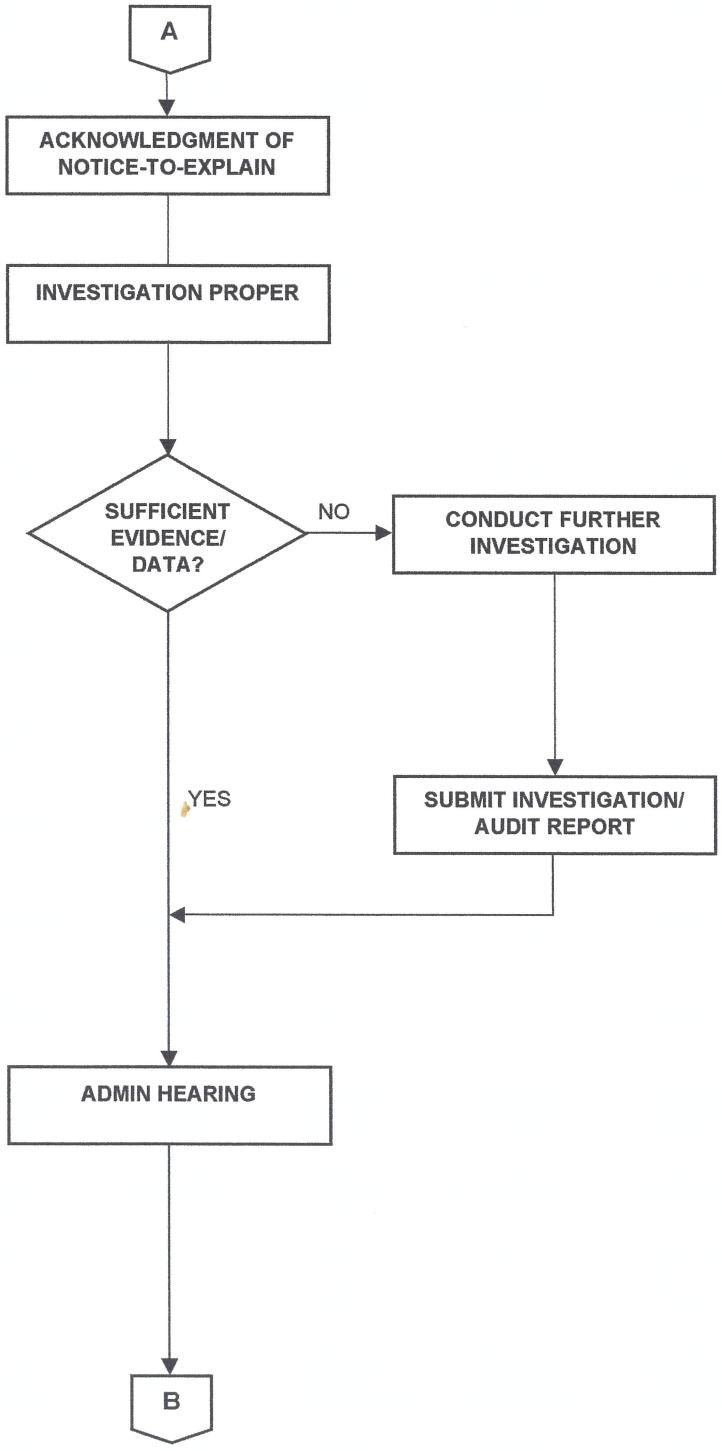
B. Appeal

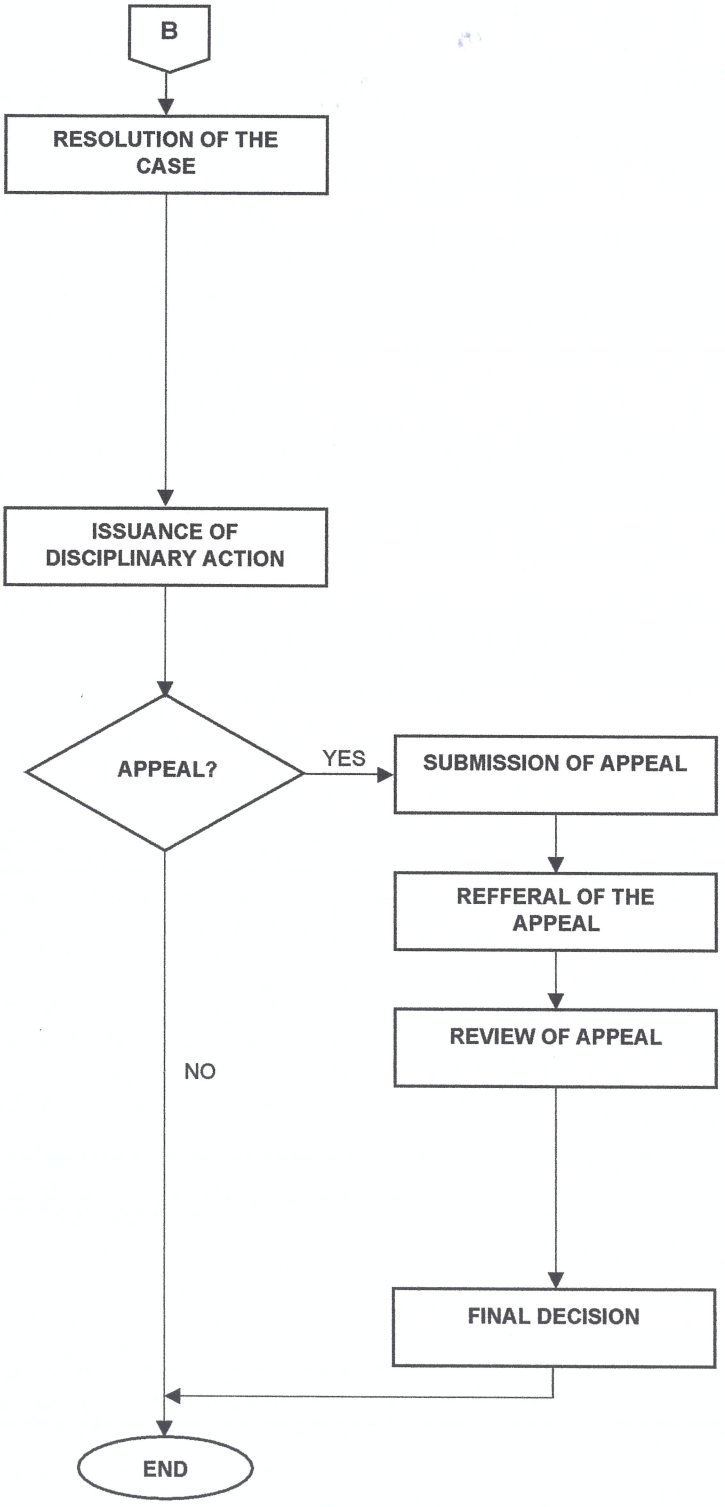
Table 6. Appeal

Responsible	Procedure	Guidelines
Employee Concerned	1. Writes a request memo to the Resident Manager or President to appeal his case. 2. Submits duly signed request to the Resident Manager or President, through HRA or Immediate Head.	
Immediate Head or HRA Head	3. Refers the appeal letter to the Resident Manager or President.	
Resident Manager/ President	4. Receives the letter and requests for the investigating committee to review the case given the factors provided by the employee. 5. Discusses with the committee members the case in the committee's meeting and assess possibility of reconsidering the penalty. The proceedings shall be recorded in the committee's minutes of meeting. 6. Based on discussion, a final decision must be arrived at. Majority of the members' votes shall provide the final recommendation with the final approval of the Resident Manager or President. Follow procedures on reviewing notice of Final Decision.	

Table 7. Flow Chart

	Responsible	Timeline
	• **Employee/Whistleblower** may report offense to Immediate Head/Human Resource/Audit/Risk verbally or in writing • **If Immediate Head** is the one who noted the offense, proceed to reviewing offense. • **HR or Audit & Risk** reviews reported violation/s and submitted evidence and refers to Immediate Head of the employee in writing with evidence. • **HR** prepares 2 copies of NTE signed by the Resident Manager (Sites) or President (CHQ and Subsidiary) and send NTE to the employee thru Immediate Head • **IF YES, HR or Immediate Head** issues disciplinary action based on the proceedings. • **HR** prepares 2 copies of NTE signed by the Resident Manager (Sites) or President (CHQ and Subsidiary) and send NTE to the employee thru Immediate Head	

	Responsible	Timeline
	• **Employee** acknowledges NTE received from Immediate Head or HR by signing the document. • **Employee** may air his side on the charge raised against him through NTE or during administrative hearing. • **If YES** (with insufficient evidence), **Grievance/Investigation Committee** acknowledges, and reviews all submitted documents received from Immediate • **Grievance/Investigation Committee** request (HR to issue NTE to concerned employee and other parties involved. • **If NO** (with sufficient evidence), **Grievance/Investigation Committee** conducts Hearing with involved parties to gather more information relevant for the investigation. • **Grievance/Investigation Committee** submits RR and case folder to Resident Manager or President as applicable signed by all members	

	Responsible	Timeline
	• **President/Resident Manager** reviews and provide his comments and approval. • **Grievance/ Investigation Committee** sends approved RR and case folder to HR for implementation • **HR or Immediate Head** issues disciplinary action based on the proceedings. • **IF YES, Employee** may submit appeal within 7 days after receipt of NDA. • **HR Head/Immediate Head** refers appeal to the Resident Manager or President for review. • **President/Resident Manager** receives Appeal and requests investigation committee to review the case based on the given factors cited by employee. • **HR Head/Immediate** Head issues final decision • **If No Appeal, HR Head/Immediate Head** issues final decision	

VI. EFFECTIVITY AND UPDATING

The Employee Code of Conduct shall take effect on the date it is approved and shall supersede all other policies previously issued. Any revision shall be approved by the President based on recommendations of the Policy and Procedure Committee.

VII. CHANGE HISTORY

Table 8. History

Version No.	Date	Change		Author
		Policy	Particular	
1	3/29/79	Employee Code of Conduct	New Document	Human Resource
2	2015	Employee Code of Discipline	All sections	RA Claravall/CC Del Prado
3	4/15/19	Employee Code of Conduct	All sections - To conform with changes in structure, policies, and procedures	DA Tongco/RS Songayab
4	10/1/22	Employee Code of Conduct	All sections - Categorized offenses to minor and major offenses with sub-sections as follows: I. Business/Trade Engagement II. Personal Behavior/Conduct and Job Performance (to include theft of minerals) III. Safety, Health, Security, Environment, Camp Rules and Public Order More general general offenses, detailed guidelines and procedures Due Process Flowchart for easy reference	RS Songayab/Legal