



CODE OF CONDUCT
&
BUSINESS ETHICS

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I. Values

Alliedbankers Insurance Corporation herein referred to as (ABIC) or (The Company) adheres to the principle that the best form of discipline is self-discipline. The Company prefers employees who can discipline themselves without the compulsion of law or fear of punishment. It is not enough that the employee should avoid doing "wrong" – he should, consciously and as a personal commitment "do the right things the right way" for the right purpose at the right time. Employees should do the right things. After all, they want to, rather than avoid the wrong things because they fear the consequences.

II. Policy Statement

1. Alliedbankers Insurance Corporation believes that maintaining a peaceful and harmonious work environment will contribute to increased work productivity and employee job satisfaction. To achieve this, it is necessary to establish standards of conduct among its employees and to promote employee discipline and compliance with Company policies, rules, regulations, and procedures.
2. In support of the Company's Code of Ethics which identifies the norms of business conduct and ethics that all Company employees are expected to commit to, the Company maintains a set of rules and regulations which serves as a guide to employee behavior and actions in the workplace.
3. Employment in the Company signifies willingness and commitment to perform according to standards set by management and to abide by all the policies and procedures as well as rules and regulations of the Company.
4. The right to fire and discipline are purely management prerogatives. Management shall take administrative or disciplinary action for employee violations of Company policies, procedures, rules, and regulations, to preserve order and discipline within the organization.
5. The purpose of this Code is to provide a reasonable and lawful process for resolution of issues and problems arising from employee's performance and/or behavior and to ensure the fair, just, and consistent implementation of ways to correct and address actions not under the Company's policies.
6. In carrying out its responsibility and prerogative to fire and discipline, management shall at all times uphold the value of fairness and render decisions affecting its employees in a just and impartial manner.

III. Norms of Business Conduct and Ethics

This set of Conduct and Ethics is for the proper guidance and compliance by all employees. It incorporates the core values and norms of behavior that the Company strives to uphold in all aspects of its business.

These values are particularly important in the Company because the business of insurance and reinsurance is based on the principle of utmost fidelity and good faith. The insurer or reinsurer relies on the honesty and integrity of client information obtained as a prerequisite to risk acceptance. In the same manner, the insuring and reinsuring public relies on the ability of the Company to make good its "promise" or commitment to indemnify our clients. All Company employees must therefore have unquestionable integrity. They are entrusted with the responsibility of managing people to help the Company establish and achieve its goals and objectives.

A. *Business Conduct and Behavior*

In the workplace, employees must conduct themselves with honesty, fairness, dignity, and integrity and should avoid any conflict between private and business interests. Beyond that, they should take care that they conduct themselves in their private life in a manner that does not bring Alliedbankers into disrepute.

The Company adheres to "zero-tolerance" on all offenses that fall under Honesty and Integrity. Substantiated offenses shall be reviewed for possible Civil or Criminal action by the company against the employee.

1. All ABIC employees should conform to the Employee Code of Conduct and other Employee policies. All employees are expected to conduct themselves in a disciplined manner, consistent with the ABIC Employee Code of Conduct and proper office decorum. Should problems arise, each employee is expected to deal with the situation in a mature manner, taking on an earnestly thoughtful character or sober disposition. They should be careful so as not to cause any harm to others.
2. Employees are to conduct their job following applicable laws and regulations and perform their duties in good faith and to the best of their ability. Employees must take full responsibility for their work, their actions, and their behaviors
3. ABIC will religiously comply with all the laws, rules, and regulations applicable to employment.
4. Employees shall not engage in any unauthorized use, misappropriation, or malicious disclosure of Employee information, which includes but is not limited to, human resources-related information, medical information, government-related information (as submitted to the different national or local government regulatory agencies such as BIR, SSS, Pag-Ibig, and others) and background check information under any circumstances.
5. Employees must similarly comply with the Data Privacy Act of 2012 and all laws and regulations relating to the proper handling of personal information of employees as well as of individuals with special working relationships with ABIC such as the Board of Directors

and consultants. Employees must use or share information only for the purpose for which it was intended.

6. ABIC aims to promote an office atmosphere where people have high respect for one another and to maintain a work environment that is free from all forms of sexual harassment or intimidation. It supports RA 7877, the Anti-Sexual Harassment Act of 1995, an act declaring sexual harassment unlawful in the employment, education, and training environment, and for other purposes.
7. It is the duty of every superior to maintain discipline within his area of responsibility. He shall be strictly accountable for the proper discipline and job performance of all employees reporting to him, where they are guided by and compliant with the Company's Policies and Procedures. It shall be the duty of the superior to act immediately upon all reports of violations, otherwise, he shall be guilty of failure on the job.
8. It shall be the duty of every employee to report to management with reasonable dispatch any information in their possession about any offense which has been, is being, or is about to be committed. Failure to do so will subject the employee to the appropriate disciplinary action.
9. An employee's record of offenses shall diminish or remove, as the circumstances may warrant, an employee's eligibility for merit increases, promotion, incentives, or similar improvement in his job situation.
10. It shall be the responsibility of all employees to read, understand and familiarize themselves with all the provisions of our Code. Ignorance of or unfamiliarity with the provisions of this Code shall not excuse an employee from the consequences of committing a violation.

B. *Health, Safety, Security, and Proper Use of Company Assets*

The Company is committed to provide and maintain a safe, secure, and healthy work environment.

1. Employees should have the responsibility to work safely, to keep work areas and common areas in the Company neat and clean, not just to reduce the chances of injury but also to make the office a more attractive and pleasant place to work in. Employees are urged to report to their immediate superior or to Human Resource Administration Department (HRAD) accidents or any condition or practice which is unsafe, whether or not these result in personal injury, or no matter how minor they might seem to be.

2. Employees are also responsible for the proper use of Company property and resources, including Company time, supplies, equipment, vehicles, and software, efficiently and only for official purposes;
3. Safeguard Company assets from loss, damage, misuse, or theft.
4. Respect intellectual property rights.

C. *Job Performance*

1. The primary responsibility of an employee is to perform well on the job that is assigned to him/her by his/her immediate superior. He/she is expected to carry out his/her responsibilities dutifully and following the standards set by management.
2. The Company's performance management system is likewise a means through which employee discipline is maintained and where employee work performance and behaviors that are not under Company policies, procedures, rules, and regulations, are documented and corrected.

D. *Conflicts of Interest*

Alliedbankers gives a high priority to the interests of customers. ABIC believes that conflicts of interest can cast doubt on the integrity and professionalism of the company. Potential conflicts of interest must be identified at the earliest reasonable time. If the same cannot be avoided, any conflict situation must be handled fairly.

1. Employees should avoid putting themselves in situations where their dealings conflict with the company's business dealings or interests. Where this is unavoidable, such dealings must be disclosed to the Immediate Superior when it occurs.
2. Employees should consult with their Immediate Superior before entering into any business arrangement which may cause a conflict of interest, e.g. conducting business with a family member or friend.
3. Directors and Employees are prohibited from using their position of authority or rank to directly or indirectly derive personal gain, profit, or advantage.
4. All Directors and Officers should comply with the Governance Policy on Conflict of Interest indicated in the ABIC's Corporate Governance Manual (Where we can find in MCG).

Conflict of Interest Administrative Procedure

All cases involving Conflict of Interest shall be heard and resolved by Human Resource in coordination with the Immediate Supervisor and the Legal Counsel assigned to the company only as needed. The employee who in his/her judgment that there exists a conflict of interest in his/her duties and responsibilities shall have the obligation to report the matter to his immediate supervisor. The employee should submit a written report about the conflict of interest to his/her immediate supervisor. Then, the immediate supervisor shall endorse the matter to HRAD. A closed meeting shall be held 2 days from the endorsement of the supervisor, attended by the employee, supervisor, HR Manager. HRAD will issue a notice about the matter depending on the weight of the offense to determine the turnaround time in coming out with a final resolution.

E. Conducting Business with Counterparties

1. Directors and Employees should treat counterparties with transparency, fairness, and honesty.
2. ABIC's unwavering commitment to serve customers and to provide quality products at competitive prices. These policies, procedures, and working conditions provide a work environment in which both customer interests and employee interests are served.
3. Employees should ensure that all counterparties concern are handled promptly, correctly, and efficiently. Employees must likewise see to it that clients are treated with fairness and empathy. Employees must ensure consistent execution, monitor the resolution of a complaint to the client's satisfaction, and provide complete, timely, and accurate reporting and documentation of all aspects of complaint management.
4. Maintain and safeguard the confidentiality of information entrusted by our counterparties with whom the Company relates, except when disclosure is authorized or legally mandated. Confidential information includes any non-public information that might be of use to competitors, or harmful to the Company, customers, business partners, or such other parties with whom the Company relates if disclosed. Employees are to follow company policies, procedures, and related laws, and rules and regulations concerning privacy and security of client information, particularly the Data Privacy Act of 2012.

F. *Maintaining Relationship with Regulators*

1. Alliedbankers maintains a proactive and constructive relationship with its regulators, namely the Insurance Commission (IC), Bureau of Internal Revenue (BIR). Employees are expected to be responsive, fair, and transparent with the examiners at all times especially during the examination, and provide appropriate support.
2. Alliedbankers should ensure full commitment to fight against money laundering and the financing of terrorism and comply with a risk-based "know-your-customer" policy in line with applicable laws and regulations.

G. *Maintaining Company Records and Reporting Requirements*

1. Alliedbankers commits to integrity and transparency in financial reporting. ABIC disclosures must always be full, fair, accurate, timely, and understandable as mandated under applicable laws and regulations.
2. Employees who prepare reports and documents that are provided to regulators or for internal use of the Board and senior management, have a special responsibility to meet recording, processing, and analysis standards of the data and information. Ensure that these are prepared following applicable accounting standards, legal requirements, and strict internal controls.
3. Abide by Company policy and applicable laws regarding business records retention. Ensure that records are not altered, concealed, destroyed, or falsified to impede.

IV. *Occupational Health and Safety Policy*

This Policy will apply to ABIC at all locations. The Company is committed to providing a healthy and safe work environment for its workers and preventing occupational illness and injury. To express that commitment, we issue the following policy on occupational health and safety.

As the employer, The Company is responsible for the health and safety of its workers. ABIC, will make every effort to provide a healthy and safe work environment. We are dedicated to the objective of eliminating the possibility of injury and illness. Supervisors also have a general responsibility of ensuring the safety of equipment and facility. It is the duty of each worker to report to the supervisor or manager, as soon as possible, any hazardous condition, injury, accident, or illness related to the workplace. Also, workers must protect their health and safety by complying with applicable Acts and Regulations and following policies, procedures, rules and, instructions as prescribed by ABIC.

ABIC will, where possible, eliminate hazards and, thus, the need for personal protective equipment. If that is not possible, and where there is a requirement, workers will be required to use safety equipment, clothing, devices, and materials for personal protection.

ABIC recognizes the worker's duty to identify hazards and support and encourage workers to play an active role in identifying hazards and to offer suggestions or ideas to improve the health and safety program.

V. *Anti-Bribery & Corruption Policy*

Alliedbankers Insurance Corporation (the "Company") upholds the principles of honesty, integrity, and transparency in conducting business. In line with this commitment, the Company strictly prohibits any form of bribery and corruption within the Company, as well as in dealing with its business partners, service providers, customers as well as governmental agencies, and instrumentalities.

It is every director's, officer's, and employee's responsibility to prevent or counter bribery and corruption in the Company by adhering to this policy.

All directors, officers, and employees should ensure that any interaction with public officials complies with all relevant laws and regulations, as well as this policy. Further, the Company expects its suppliers and contractors to uphold the same standards as set out in this policy.

The policy is subject to such rules as the Company may prescribe on gifts of minimal value such as promotional items and minor company collaterals as may be customary in the ordinary course of business and as appropriate to the occasion. Nevertheless, directors, officers, and employees must exercise caution regarding the giving or receiving of, business-related gifts or hospitality.

The following shall be considered as prohibited acts of bribery and corruption:

- Directly or indirectly offering, giving, requesting, or receiving money, gifts, favors, benefits, or anything of value to influence decisions or to gain unfair advantage in company transactions;
- Using or performing official functions for personal gain;
- Performing or neglecting to perform any official function in exchange for receiving money, gifts, favors, benefits, or anything of value in the course of business or;
- Any actions which are similar to those stated above.

Bribery and corruption may be committed even if the act is done with a person who is not a public official and is in the private sector. Any act, attempt, or allegation of bribery and corruption shall be treated as grave offenses that will be handled with dispatch and dealt with the full force of the applicable laws, rules, or regulations. In handling any case alleging bribery or corruption, the Company shall be guided by the Company Manual for Corporate Governance, this Code of Conduct & Business Ethics, the Company's Employee Handbook, the Revised Penal Code, and other relevant laws and regulations about the said subject. Failure to observe this policy is a cause for administrative disciplinary action, without prejudice to whatever civil or criminal liabilities that may be meted out to the offending director, officer, and/or employee.

Any act or attempt by a Company employee to commit bribery or corruption should be reported to HRAD, the Internal Audit Team or the employee's immediate supervisor, or any other responsible officer. The procedure for reporting and the protection afforded by the Company Whistleblower Policy shall apply in each instance of reported bribery and corruption.

No employee will be penalized, or be the subject of other adverse consequences for refusing to pay bribes even if it may result in the Company losing any business.

VI. Implementation of the Rules of Conduct

- 1. Responsibility of Line Management** - The maintenance of order and discipline is a Line Management responsibility. Thus, the implementation of rules, including the conduct of disciplinary proceedings, is a Line Management function. He or she shall be assisted by HR, Internal Audit, Legal, and/or Security as may be warranted by the circumstances of each case.
- 2. Nature of Disciplinary Proceedings** – Disciplinary proceedings or administrative investigations shall be summarized in nature. The rules of procedure and evidence as applied in judicial proceedings shall not be controlling. The Company shall use all reasonable means to ascertain the facts in each case speedily and objectively, all in the interest of due process.
- 3. Gathering of Evidence** - Upon receipt of a report, verbal or written, signed or unsigned, or discovery of an incident that a violation of company rules and regulations has been committed or is being committed, the Immediate or Next Level Superior concerned shall immediately initiate an investigation or a fact-finding inquiry to be conducted to determine the veracity of the report and gather the necessary evidence, which may be in the form of documents or sworn statements of witnesses. The Immediate Superior shall be assisted by HR, Internal Audit, Legal, and/or Security to determine what appropriate measures should be taken in any particular instance.

VII. Administration

1. Roles and Responsibilities

The administration and implementation of the Code shall be the primary responsibility of the Human Resources Management Department.

The Human Resources Management Department shall be responsible for:

- a) Dissemination of the Code to all Directors and Employees;
- b) Monitoring of actions taken for reported infractions and progress of any administrative proceedings;
- c) Coordination, facilitation, and/or participation in any administrative proceedings;
- d) Implementation of administrative sanctions.

Department or Section Heads shall be responsible for:

- a) Informing the Human Resources Department of all reported infractions. Department or Section Heads shall be held liable to the company for whatever damages that may result from inaction or delayed appropriate action.
- b) Directors and Employees shall be responsible for:
 - c) Reading, understanding, and complying with this Code of Business Conduct and Ethics and all its related policies to be aware, at all times, of the pertinent regulations that are relevant in carrying out Alliedbankers business operations. Directors and Employees must know how the Code applies to their respective roles and duties and are expected to behave according to the principles contained herein.

2. Communication and Dissemination of the Code

This Code of Business Conduct and Ethics can be accessed through Alliedbankers Employee Portal.

3. Review and Amendment of the Code

This Code of Business Conduct and Ethics shall be reviewed and assessed by the Human Resources Management Department or by a technical working group formed for such purpose, at least annually. Appropriate approval of any amendments and revisions to the Code shall likewise be obtained from the Board of Directors.

Upon approval of this Code, all existing internal policies, procedures, rules, and memoranda inconsistent with the Code are deemed repealed or amended. ABIC reserves the right to repeal, amend, modify or supplement the provisions of this Code, as circumstances may warrant.

This serves as a guide in implementing uniform, fair and consistent discipline at the workplace.

VIII. Table of Offenses and Sanctions

This must be read in conjunction with the Company’s Employee Handbook.

The table of administrative offenses and sanctions below shall have the following legend:

VW - Verbal Warning

WW – Written Warning

FWW – Final Written Warning

S (#) – Suspension (number sign after S represents no. of days)

D – Dismissal

Offenses	Recurrence of Offenses				
	1st	2nd	3rd	4th	5th
Malingering, wasting time, loitering, or loafing during office hours	VW	WW	FWW	S3	D
Soliciting donations, selling merchandise or tickets, circulating a petition or other literature during working time without approval of Management	VW	WW	FWW	S2	D
Leaving workplace, or quitting work before specified time; exceeding coffee	VW	WW	FWW	S2	D

breaks, or repeated failure to begin work at starting time					
Loss of accountable forms with no acceptable reason	VW	WW	FWW	S3	D
Failure to submit required report regularly	VW	WW	FWW	S3	D
Doing work during office hours for personal benefit or gain.	VW	WW	FWW	S3	D
Littering, creating, or contributing to the unsanitary condition, violation of common health and sanitation rules.	VW	WW	FWW	S3	D
Posting unauthorized notices, signs, or printed matter on bulletin boards or removing or defacing approved notices without approval	VW	WW	FWW	S3	D
Tampering with, taking down, or removal from its location any firefighting equipment, including fire extinguishers or sounding false alarm	VW	WW	FWW	S3	D
Smoking in restricted or prohibited areas; willful disregard of other common safety rules.	VW	WW	FWW	S3	D
Sabotage or any form of slowdown or deliberate restriction of output.	VW	WW	FWW	S3	D
Making or spreading false vicious and malicious statements, concerning any employee, superior, the Company or its products, and clients.	VW	WW	FWW	S3	D
Indecent conduct or immorality.	VW	WW	FWW	S3	D
Discourtesy to stakeholders, particularly clients.	VW	WW	FWW	S3	D
Gambling in any form on Company premises at any time.	VW	WW	FWW	S3	D
Drunkenness or reporting for work under the influence of liquor.	VW	WW	FWW	S3	D

Committing physical force or violence or inflicting bodily harm towards superior or other officers.	D				
Fighting or instigating a fight, inflicting or attempting to inflict harm upon another for any reason.	D				
Unauthorized possession of firearms, knives, explosives, or other deadly weapons inside Company premises.	D				
Serious horseplay which results in serious physical injury or death	D				
Violation of the Law on Sexual Harassment	D				
Using profane or obscene language in addressing a superior, or uttering vile provocative or abusive language to an employee, client, or member of Management.	D				
Conviction in a criminal case	D				
Theft and robbery of Company property or stealing from co-employee	D				
Malversation of Company Funds	D				
Falsification of personnel, medical, and other Company records	D				
Willful breach of trust where continuance in service is inimical to the Company's interest	D				
Soliciting, offering, or accepting anything of value in exchange for a job, work assignment, or favorable condition of work.	D				
Soliciting, or receiving fees, commissions, lavish gifts from clients, suppliers, service providers in exchange for favorable business deals.	D				

Directly or indirectly requesting or receiving any gift percentage or benefit for his past, present, or intended intervention in any dealings between the Company and any other party.	D				
Use of Corporate funds for payment of expenditures not authorized or not reimbursable under the Company policy.	D				
False claims for reimbursements	D				
Giving false testimony (adding or concealing material facts) during Company investigation	D				
Disclosure of confidential data trade secrets or classified information to any unauthorized persons.	D				
Insider trading- use and disclosure of material non-public information in trading of company shares/securities	D				
Bringing out Company records of any kind without authority.	D				
Failure to turn in a collection of money (Cash or check) or liquidate cash advances within the prescribed period.	D				
Committing acts of threats, intimidation, coercion, harassment, etc. Towards superiors or other officers	D				
Disrespect, Discourteous, insulting, unbecoming, slanderous towards superior or other officers.	D				
Deliberate and intentional destruction of Company property, machines, or equipment and vandalism.	D				