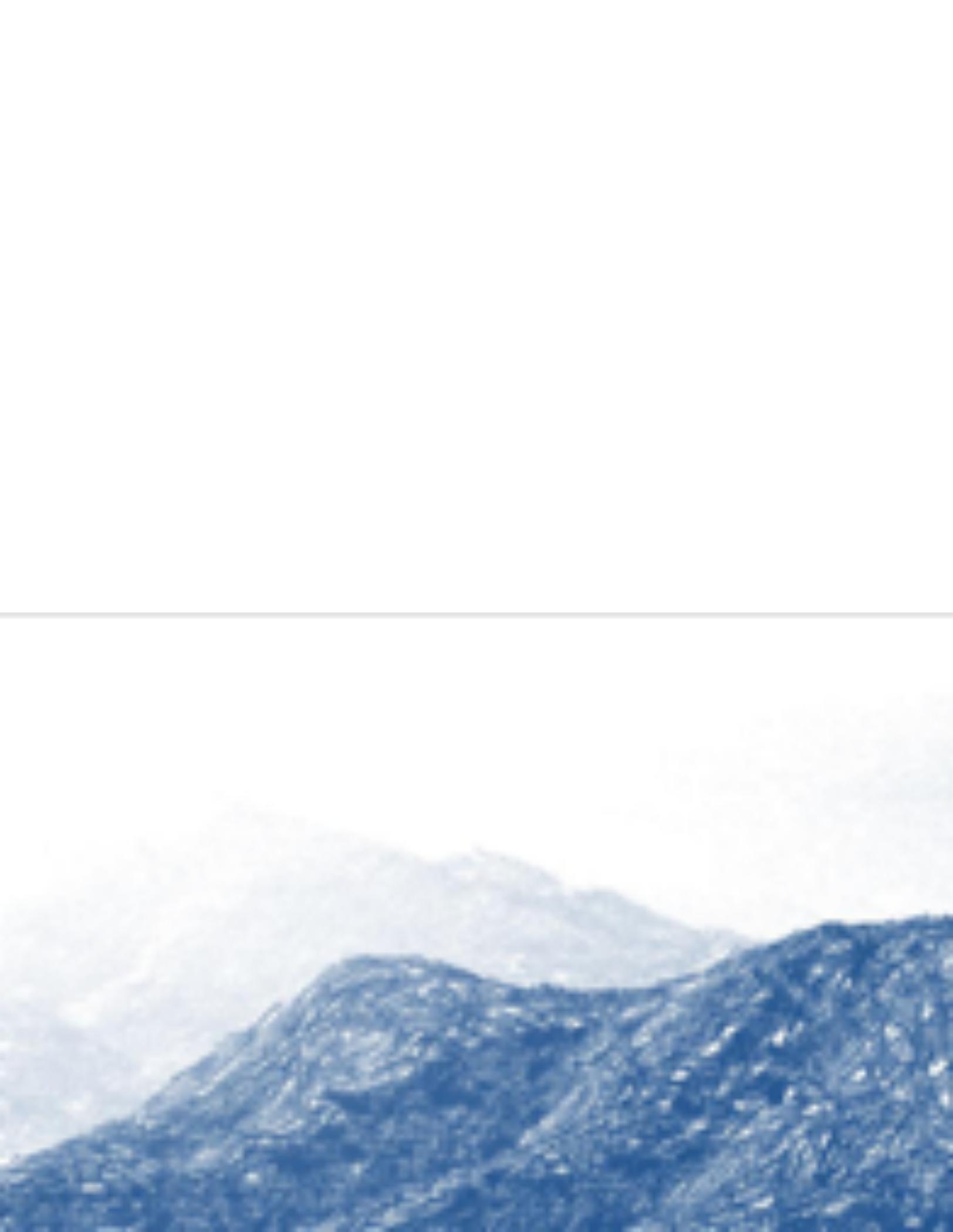




The HMO Subsidiary of Insular Life Assurance Company, Ltd.

IHC BLUEBOOK







The HMO Subsidiary of Insular Life Assurance Company, Ltd.

CODE OF CONDUCT



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Makati City, Philippines
January 8, 2020

Magandang araw!

We at InLife Health Care continue in the pioneering spirit of our parent company, Insular Life (InLife), the first and largest Filipino life insurance company with an unbroken service record of more than a hundred years. Like our parent company, InLife Health Care has an unbroken service record which now spans almost three decades.

Acknowledging that our continued success largely depends on our reputation, our Company is conscientious in adhering with laws and applicable rules and regulations of the industry as well as with high standards of business and ethical behavior. Toward this end, this Code of Conduct (also referred to as the Company's Bluebook) is implemented to define business conduct standards for everyone who works for and with us in all business areas. Each member of the organization is expected to strictly adhere with this Code of Conduct and with other Company guidelines and rules and regulations.

More than sustaining an organization where we can all be proud to be part of, this is about doing the right thing.

(SGD.) MARIA NOEMI G. AZURA
President and CEO



Who we are.

InLife Health Care continues in the pioneering spirit of our parent company, Insular Life (InLife), the first and largest Filipino life insurance company with an unbroken service record of more than a hundred years. Like its parent company, InLife Health Care has an unbroken service record which now spans almost three decades since 1991.

As an all-Filipino HMO, InLife Health Care has a unique and deep insight into Filipinos' health care requirement and how best to deliver an experience that is aligned with our values and cultural preferences. We are committed to be the HMO that is responsive to the widespread demand for timely, medically-appropriate, affordable, and accessible medical care. We design and curate our health care solutions to promote holistic wellness throughout life stages. It's about making sure our members live a rich and sustainable lifestyle, empowering them to identify choices that will contribute toward their well-being, and connecting them to the latest and most credible health care resources on self-care and disease management. InLife Health Care dedicates itself as the health partner of Filipinos in achieving wellness for a lifetime.

To deliver this promise, InLife Health Care uses a mix of people connection and technology. To date, our health care network consists of more than 33,000 accredited medical specialist and over 1,000 medical facilities nationwide, and we employ advanced technology to streamline our operation efficiencies and create an exclusive and premiere HMO experience. We're constantly working to expand our network of collaborators and improving our systems to be able to reach and impact as many Filipinos as possible.

We make the Filipino's health journey our mission.





Our Mission

We are a member of the Insular Group that provide quality and dependable health care to all individuals.

We uplift the quality of life of our employees, agents and partners as we empower them to reach more individuals and to provide the Filipino way of caring.

We show our concern for our customers' well-being through continuous innovation and use of technology in the development of excellent health care products and delivery of services.

We uphold the right of individuals to have access to quality health care.

Our Vision

Lifetime of Health and Wellness for an awakened nation.

Core Values

Integrity. We uphold uncompromising adherence to the highest moral and ethical principles in conducting our business at all times. We exercise true, honest, prudent, dignified and objective methods of implementing our Mission.

Commitment to Excellence. We are dedicated to exceed the highest quality of health care products and services to the public and to our members through constant delivery of efficient and superior degree of service and care. We continue to involve ourselves in uplifting the conditions of the community by contributing to national growth, providing healthcare services responsive to the majority in the society and the continuing improvement in the company performance.

Concern for Customer Well-being. We espouse the patient's rights and welfare at all times and in all undertakings. We provide our clients and members not only comprehensive, affordable and cost-effective health care programs, but also high quality of health care services through our qualified, competitive, well-trained and committed health care providers and personnel. We continue to desire to work for common good and render what is rightfully due to all members of society – the members, employees, agents, medical providers, stockholders and the general public.

Innovation. The company has unlimited potential to contribute valuable services to the public and to its members. We persist for creativity and innovation in the company's product and health care services to attain corporate goals. We keep abreast of latest medical developments and technologies and constantly improve and update our health care products and services to deliver the best quality of health care services to the public and to our members.



1. GUIDING PRINCIPLES

- 1.1. **Compliance with Laws and Company Policies, Directives and Procedures** – Our business is imbued with great public interest. As such, we are required to give our utmost dedication and commitment to our work for the benefit of our clients and the general public. Toward this end, all of us are enjoined to observe and comply with the following precepts:
- 1.1.1. All employees are expected and directed to comply with all laws, government rules and regulations, and Company policies, directives and procedures relating to their functions and business activities. Any act or omission which violates any of such Policies, Directives and Procedures shall be subjected to disciplinary action.
 - 1.1.2. It is the responsibility of each employee to know and understand the legal and policy requirements applicable to his/her functions and to notify Human Resources when a violation of any of the laws and/or policies has occurred.
 - 1.1.3. Each employee is expected to report to the Human Resources any attempted or actual violation of Company policies, directives and procedures and to cooperate in the investigation of any alleged violation thereof.
 - 1.1.4. The report of any violation may be forwarded to the Management through the following: Employee's Superior, Human Resources and Chief Risk Officer.
 - 1.1.5. Concealing a violation or altering and/or destroying an evidence to hinder an investigation, or willful withholding of information thereon shall be considered an offense against the Company.
 - 1.1.6. Officers, Managers and Supervisors shall be responsible for the following:
 - 1.1.6.1. To ensure that they themselves and employees, consultants and contractors under their supervision are knowledgeable and are complying with laws and policies governing their functions and activities;
 - 1.1.6.2. To seek advice from the Legal section under the Office of the President when issues of confusion and conflict on matters pertaining to laws and Company policies arise;
 - 1.1.6.3. To orient employees under their supervision about the laws and policies applicable to their work and to take steps to prevent any violation of governing laws or Company policies;
 - 1.1.6.4. To detect, evaluate and report to Management violation of laws and Company policies which may arise in their areas of responsibility; and,
 - 1.1.6.5. To ensure that any employee who reports to Management a suspected violation of law or Company policy is protected from any form of retaliation.
 - 1.1.7. Protecting the Company's reputation and integrity, including its resources is every employee's responsibility.
 - 1.1.8. Employees who violates any law, or any of the Company policies, directives and procedures including any of the provisions herein shall be subject to disciplinary action up to and including termination, depending on the seriousness of the violation.
- 1.2. **Guidelines on Ethical Business Conduct**
- 1.2.1. The Company, in the conduct of its business, is guided by its Corporate Core Values: **Integrity, Commitment to Excellence, Concern for Customer Well-Being and Innovation**. All employees are expected to conduct their activities according to these values.
 - 1.2.2. Inasmuch as not all activities/situations can be governed by law and Company policies, employees are expected to use their good judgment in taking any action. In situations where no specific policy is applicable, employees must ensure that their actions protect the Company's reputation as an ethical Company, and that such actions are aligned with the enumerated Corporate Values.

2. CONFLICT OF INTEREST

- 2.1. All actions and decisions of an employee in the conduct of his/her day-to-day affairs, especially as they relate to the Company's business operations, must always be made solely in the best interest of the Company. All employees therefore must avoid the appearance and the fact of conflict of interest.
- 2.2. An employee, in his decision-making process, should not be influenced by personal considerations, which might affect his/her judgment in deciding for the best interest of the Company. Personal considerations may involve interests of the employee him/herself or those of the members of his/her immediate family – his/her spouse, children, parents, or brothers and sisters. Other conflict of interest situations may also involve persons or entities other than the employee's immediate family members.
- 2.3. The following and similar cases are areas where an employee may be considered in a conflict of interest situation:

- 2.3.1. **Investments** – In general, an employee or his/her immediate family members should not have any major ownership or business/profit interest in a competing firm and firms of suppliers and/or customers with whom he/she deals in the performance of his/her function and who may benefit or derive any profit from the employee's knowledge and decision in the discharge of his/her Company responsibilities. Immediate family members of an employee include his/her spouse and children, parents, brothers and sisters.

Employees whose functions relate to the investment operations of the Company must use the Company's facilities, time and resources solely for the benefit of the Company.

An employee must not use or avail of any resource or opportunity, for his/her own personal investment transactions as well as those of his/her immediate family members and other persons/entities without the proper authorization from the Company.

- 2.3.2. **Other employment or business activity** – All employees are expected to render their full time and best efforts to the Company during the Company's official working days and hours. No employee should have any outside employment or other business interests which interfere with his time or attention he/she is expected to devote to his/her regular duties and responsibilities with the Company. Moreover, outside employment or business interest that competes with the business of the Company, or which includes the use of information regarding the Company and its clients, and which will otherwise be detrimental to the interest of the Company, shall not be allowed.

- 2.3.3. **Entertainment/Gifts** – Employees are prohibited from accepting entertainment, commissions and gifts in whatever form which can be interpreted as placing an obligation on the Company to favor the requests of the gift-giver, thus placing the employee in a conflict of interest situation.

All employees should likewise refuse any entertainment or gifts, which, although initially appearing to be not connected with their respective functions, may be considered, in the future, as an influence to their decision involving the gift-giver.

However, moderate gifts may be accepted provided that the value should not be more than One Thousand Pesos (Php 1,000.00). Gifts (non-food items) with the value of more than One Thousand Pesos (Php 1,000.00) shall be declared and surrendered immediately to Human Resources for later disposal, upon approval of the President. Food items may be consumed by the units/departments.

In cases of invitations for orientation and courses required in a business relationship, such invitation should be forwarded to the Office of the President for evaluation/approval.

- 2.3.4. **Employment/Business Activities of Relatives** – An employee whose spouse or close relative is an employee and/or owner of a firm, which is a customer, supplier or competitor of the Company, should not participate in decisions with respect to the Company's existing or possible business relationship with that firm. The concerned employee is also prohibited from discussing and disclosing any confidential information about the Company in relation to the transaction that will give his/her spouse and/or relatives any undue advantage over other business firms or which will be prejudicial to the interests of the Company.

If an employee has a close relative who is also an employee of the Company, direct and immediate reporting relationship shall not be allowed, except when the position requires special technical knowledge and skills. However, such reporting relationship shall need prior approval from the Office of the President.

Close relatives of an employee include spouses, children, parents, sisters, brothers, first cousins, and in-laws (relatives by affinity up to first cousins).

- 2.3.5. **Selling health care products and services** – Employees shall not be allowed to earn any incentive or derive any benefit from selling Company's health care products and services, unless otherwise approved by the Board and/or the President. Potential health care business encountered by employees and their spouses must be referred to the concerned Direct Sales Heads.

In general, employees' close relatives such as spouses, children, parents, sisters, brothers, first cousins, and in-laws (relatives by affinity up to first cousins) are not allowed to sell health care products of the Company.

In cases of employees whose functions do not fall under the core operations of business, their close relatives may be allowed to join the agency force, subject to disclosure and approval from the Operations Head concerned and the Head of Sales and Marketing Operations.

- 2.3.6. **Assumption of Government Positions** – Except as provided hereunder, any employee who is appointed to or is filing a certificate of candidacy for election to a government position is required to officially notify the Company in writing, through his superiors, and shall simultaneously tender his/her resignation. However, an employee seeking elective position need not resign nor will his/her employment be terminated if he/she is filing a certificate of candidacy for elective government position at the Barangay level (e.g. Barangay Captain or Barangay Councilors).

2.4. **Reporting of Conflict of Interest Situations**

- 2.4.1. In any conflict of interest situation, whether actual or potential, the employee concerned or his/her relatives involved in such a conflict situation should immediately desist from being involved therein and the employee should promptly report and disclose the same to his superiors for the best interest of the Company.
- 2.4.2. Annually, during the conduct of performance appraisal, each employee is required to report or disclose to his/her superior any potential or actual conflict of interest involving him/her or his/her relatives, as stated in the foregoing rules. Each Unit Head (Department level) shall forward a summary of these situations to the Office of the President through the Human Resources or Legal staff. A review and evaluation, in coordination with Legal staff, shall be done and the Company's action shall be communicated to the concerned employee.
- 2.4.3. Where material conflict exists, an employee is required to reasonably cooperate by resolving the conflict through dissociating himself/herself from the source of conflict.
- 2.4.4. An employee who is uncertain about the appropriateness of his/her conduct or decisions in relation to the Company's policy on conflict of interest should first consult with his superiors before acting on his/her decision.
- 2.4.5. In cases of employees' close relatives selling health care products and services of the Company, the employees concerned shall be required to sign appropriate documents

that will prevent occurrence of employees' relatives being given undue advantage over other Company agents and Account Executives.

3. PERSONAL BEHAVIOR IN THE WORKPLACE

- 3.1. **Punctuality & Observance of Working Hours and Break Periods**
 - 3.1.1. Employees must report for work not later than the start of the designated working hours for their respective functions. Habitual tardiness, as defined under the Policy on Working Hours, Attendance and Punctuality and Absenteeism, shall not be tolerated.
 - 3.1.2. Subject to government policies and exigencies of operations, the working hours of employees may be changed upon prior notice to covered employees.
 - 3.1.3. All employees shall time in before the start, and time out after the end, of each work schedule, subject to the requirements of their functions and by using the prescribed time monitoring system for the office where they are assigned.
 - 3.1.4. Employees who go out for official business (OB) shall accomplish the OB prescribed form in order to properly account the number of days and hours worked on official business.
 - 3.1.5. Only overtime work with prior approval of the immediate superiors of employees shall be allowed and paid by the Company.
 - 3.1.6. All employees are likewise expected to properly observe the break hours allowed. Managers and supervisors may provide for staggered coffee and lunch breaks for their staff in order to ensure continuous operations/servicing of customers.
- 3.2. **Attendance** - Employees are expected to report for work everyday for the smooth conduct of business. Should there be a need for an employee to be absent from his/her work, the following policy guidelines shall apply:
 - 3.2.1. For vacation, maternity, paternity leaves and other legally mandated leaves, and elective cases of sick leave, the employee must file the prescribed leave request form and secure approval from his/her superior prior to the date of his/her leave of absence.
 - 3.2.2. For emergency, sudden sickness and situations outside of the employee's control, the employee must notify his/her immediate superior within the first two hours of his/her first day of absence. This will enable the employee's superior to organize and prioritize activities affected by the employee's leave of absence. The employee must also file the prescribed leave request within three days from returning to work and secure his/her immediate superior's approval.
- 3.3. **Avoidance of Alcohol and Dangerous Drugs and Other Substances** - All employees are always strictly prohibited from possessing and using Dangerous Drugs and other similar substances as provided under the Drug-Free Workplace Policy & Program.
- 3.4. **Respect for Colleagues and Other Persons** - Each employee has the personal responsibility to treat a colleague and other persons with respect and foster a harmonious and efficient working environment.
 - 3.4.1. **Discrimination and Harassment** - It is the Company's policy to provide a work environment that is free not only from discrimination, but also from harassment and intimidation because of color, religion, gender, age, regional origin and sexual orientation. Employees are encouraged to bring to the attention of the Management in cases of discrimination and harassment. Avoidance of acts of discrimination and harassment is a continuing condition of employment for every employee.
 - 3.4.2. **Threats to individuals & unbecoming behavior** - The Company strives to maintain a working environment conducive to the smooth flow of operations by requiring all employees to observe proper office decorum and conduct. Any threat to individuals and/or unbecoming behavior shall not be allowed.

The following, among others, are considered as threats to individuals and therefore constitute prohibited acts during employment with the Company:

- 3.4.2.1. Fighting, provoking or instigating other employees, agents, clients or other persons to engage in a fight;
 - 3.4.2.2. Threatening, assaulting and inflicting or attempting to inflict harm or injury to others;
 - 3.4.2.3. Sexual advances or harassment, as defined in the Anti-Sexual Harassment Act of 1995 and the Company's Anti-Gender Sensitivity Manual, committed to an employee, client, agent or other persons;
 - 3.4.2.4. Using, whether oral or written, obscene, abusive or profane language;
 - 3.4.2.5. Actual acts of physical and/or verbal violence committed against another person;
 - 3.4.2.6. Backbiting, spreading rumors, instigating intrigues or otherwise making false or malicious statements against another;
 - 3.4.2.7. Arguing or exhibiting acts in front of a customer which may cause the latter to doubt the capability of the Company to deliver the required product and/or service;
 - 3.4.2.8. Rude or discourteous conduct, unbecoming or stubborn behavior or uncooperative attitude towards superiors, colleagues, clients, suppliers or third parties.
- 3.5. **Dress Code & Identification Cards** - In keeping with the Company's corporate image, all employees are required to wear the proper uniform or office attire during official work hours on regular business days. Likewise, Identification Cards should be prominently worn at all times within Company premises or during official business outside the Company premises. Professionalism, respectability and decency should be projected by all employees at all times.
- 3.6. **Personal Visitors & Telephone Calls** - Employees should refrain from entertaining personal visitors during office hours in Company premises. Attending to unnecessary personal matters, including vending or loitering, is not allowed. Telephone use should be limited only to official calls
- 3.7. **Other Prohibited Acts** - The following acts shall not be allowed inside the Company premises and/or while on official duty:
- 3.7.1. Any form of gambling/ betting;
 - 3.7.2. Smoking;
 - 3.7.3. Unauthorized personal solicitations, peddling and/or selling.

4. JOB PERFORMANCE

All employees are always required to perform their respective duties and responsibilities in order to realize the Company's short-term and long-term objectives.

- 4.1. All employees are expected to clearly understand their individual accountabilities as defined in their respective job descriptions. Immediate superiors of employees shall be responsible for the receipt and update of individual job descriptions in their respective units. This responsibility is carried out in coordination with the Human Resources.
 - 4.1.1. Employees are expected to judiciously and continuously exercise the authorities given to them without causing delays, losses and/or damages to the Company.
 - 4.1.2. It is the employee's responsibility to upgrade his/her level of competency in order to meet the changing requirements of business operations. The Company shall provide assistance and support along this line, as deemed necessary.
 - 4.1.3. Employees are required to adhere to the preset performance standards for their respective functions as defined at the start of a performance period. It is the responsibility of the individual employee to clarify his/her performance standards and accountabilities in the agreed upon performance plan for every period. Any need for

clarification or resolution of a concern on the performance standards shall be referred to the employee's immediate superior or the Human Resources, if necessary.

- 4.1.4. All managers and supervisors are required to ensure that procedures and directives governing their areas of responsibility are developed, updated and understood by their staff members.
- 4.1.5. Employees are always required to adhere to all procedures and directives governing transactions in their areas of responsibility. In cases where there is no existing procedure, prior written approval from the immediate superior must be secured before any action is made.
- 4.1.6. Employees at all levels are expected to prevent occurrence of errors, delays, damages and/or losses on the part of the Company in the performance of their respective jobs.
- 4.1.7. Employees shall be held accountable for errors, delays, damages and/or losses in their respective areas on account of their fault or negligence in the performance of their jobs. Situations of this nature shall be evaluated without prejudice to the applicable overall responsibility of his/her immediate superiors.

5. HONESTY & INTEGRITY

Employees are always expected to maintain the highest level of honesty and integrity. Accordingly, the following acts of dishonesty shall not be tolerated by the Company:

- 5.1. Concealing defective work which may or actually prejudice the Company;
- 5.2. Knowingly giving untruthful statements or concealing material facts in an investigation conducted by authorized representatives of the Company;
- 5.3. Knowingly giving false or misleading information to qualify for any application, preference or benefit from the Company including concealing any material fact, matter or circumstance which may impact against or unduly prejudice or affect the interests of the Company;
- 5.4. All other acts of dishonesty.

6. DEALING WITH THE PUBLIC

- 6.1. The Company is always committed to providing quality products and services to its customers. The Company's success depends on building relationships with customers and suppliers, including the members of the agency force, based on integrity, commitment to excellence, innovation and concern for customer well-being.
- 6.2. All employees are required to deal with customers, suppliers, consultants, contractors and the public at large with utmost courtesy and fairness and in accordance with ethical standards of behavior. The same behavior must also be reflected in all transactions over the telephone and in all written communications.
- 6.3. All employees must treat customers fairly without discrimination. It is the personal responsibility of every employee to develop his/her skills in handling all types of customers and ensure delivery of commitments made on behalf of the Company.
- 6.4. Purchase of materials and services should be based on merits - on a total value basis - as compared to the opportunities available from competing offers.
- 6.5. All employees who deal with suppliers, customers and consultants, whether occasionally or frequently, directly or indirectly, should be guided by the Company's policy provision on conflict of interest.

7. INTERNAL CONTROLS

Internal Controls refer to systems and processes covering Policies, Procedures and Authorization which are monitored, tracked and reported to ensure that business operations are properly managed. Strong internal controls assist Management to deliver required business results. Weak internal

controls lead to ineffective and inefficient use of resources. Inadequate internal controls can lead to actual losses from errors, fraud and inefficiency, and loss of business opportunities.

- 7.1. The design and maintenance of a strong and effective internal control system is a line responsibility. All managers should ensure that there are properly documented Policies and Procedures in their area of operations which are disseminated to all members of their staff and that these are clearly understood and followed by employees in their area of responsibility.
- 7.2. Operations and Department Managers should ensure that:
 - 7.2.1. Transactions are properly authorized and accurately recorded based on Company policies and procedures;
 - 7.2.2. Company assets are adequately safeguarded;
 - 7.2.3. Financial and Management reporting is reliable, accurate and reflects the actual corporate business activity;
 - 7.2.4. Activities comply with applicable laws and regulations; and,
 - 7.2.5. Business operations are effective and efficient as tracked through appropriate performance measures.
- 7.3. Employees who are given new assignments in areas unfamiliar to them should be given proper training and orientation on internal controls by their superiors.
- 7.4. Every employee ultimately has the responsibility to observe the required control system for his/her area of operation. It is his/her function to verify if processes and systems to achieve the Company objectives are in place and working as intended. Any doubt or confusion on or exception from any internal control policy should be referred by the employee concerned to his/her superiors prior to performance of any action on the matter.
- 7.5. All employees are required to fully cooperate and provide full information to their superiors and internal and external auditors on matters pertaining to internal controls.

8. MANAGEMENT AND HANDLING OF COMPANY RESOURCES

The fiduciary nature of the Company's business operations requires employees' fidelity in the performance of their day-to-day activities. As such, individual responsibility and approval authorities must always be respected .

- 8.1. All employees must ensure that all Company funds, properties and other resources are always properly safeguarded.
- 8.2. All employees who hold in trust Company funds must ensure that the same are properly accounted and are recorded in conformity with the Company's account classification and budgetary listings.
- 8.3. All employees whose job requires cash handling and/or collection must comply with the prescribed time for fund transfer and deposit, and liquidation of cash advances.
- 8.4. The following fraudulent acts shall not be tolerated by the Company:
 - 8.4.1. Robbery or theft committed against the Company, its employees, members, agents, suppliers and clients;
 - 8.4.2. Fraudulent conduct of bidding and/or awarding of contracts;
 - 8.4.3. Misappropriation or unauthorized use of Company funds and properties;
 - 8.4.4. Forging, altering or falsifying any personal or Company record/document used in business transactions/completion of requirements; and
 - 8.4.5. False representation as to person or authority to the prejudice of the Company or any of its members, agents, employees or other clients.
- 8.5. All Company properties and facilities, which include buildings, offices, machinery, office equipment, Company vehicles, furniture and supplies, must be used judiciously and only for official business. Cases outside of the official requirement of business may be allowed only for public relations and goodwill of the Company but with prior approval from the Office of the President or any of the authorized offices of the Company.

- 8.6. An employee is accountable for the proper use and maintenance of office equipment, Company vehicles and furniture assigned to him/her. He/she is expected to immediately report any damage of property for its timely repair and to observe proper maintenance schedules as may be required.
- 8.7. Vandalism, carving, etching, posting writings or drawings or other similar acts leading to the defacement of Company properties, and other similar acts resulting to jeopardy of the Company's cleanliness and orderliness are strictly prohibited.

9. HANDLING OF CONFIDENTIAL & PROPRIETARY INFORMATION

In the course of employment with the Company, employees will work with information and materials which are confidential in nature. Many of these confidential information are bases for management decisions while others are considered as trade secrets. These information may also include records of members, agents and employees as well as medical underwriting, claims and investigation and audit reports. Since these information are vital to the Company, they shall therefore be strictly safeguarded by all employees.

- 9.1. All employees, upon employment with the Company and thereafter, are obligated to keep all confidential information and not to disclose the same without the prior written approval of their superiors at the Operation/Department level. The protection of confidential/proprietary information is one of the major bases for the continuing relationship, anchored on trust and confidence, between the Company and its employees.
 - 9.1.1. All employees are expected to avoid any disclosure of information either through discussion in public places and/or leakage of materials and documents.
 - 9.1.2. Any confidential information entrusted to an employee should be discussed only to employees who need to know the information for the successful conduct of the Company's business. No confidential information shall be divulged to unauthorized persons without prior written approval from the concerned Operation/Department Head.
 - 9.1.3. All employees should always be fully aware of the need to protect and safeguard all Company documents. This responsibility includes the proper disposal of confidential documents. All confidential documents must be shredded before disposal.
- 9.2. Employees must safeguard all documents not only those of their respective work units but also those of the Company as a whole. Tighter control measures require that work areas be restricted to authorize staff members only.
- 9.3. This confidentiality obligation of the employee shall be perpetual and shall survive the termination of his/her employment with the Company.

10. COMPLIANCE WITH SOFTWARE LICENSING & INTELLECTUAL PROPERTY LAWS

- 10.1. All employees are strictly prohibited from performing any of the following acts:
 - 10.1.1. Installation and/or use in Company computers of any software which is not licensed in the name of the Company and/or duplication or copying thereof in whatever form or media and for any purpose;
 - 10.1.2. Use of any software or computer program licensed in the name of the Company which is not in accordance with the terms and conditions of the license agreement;
 - 10.1.3. Unauthorized copying or reproduction of any software or computer program licensed in the name of the Company; and
 - 10.1.4. Unauthorized downloading or uploading of software over the Internet.
- 10.2. Employees who are found to have violated the above rules and/or the provisions of the E-Commerce Act, the Intellectual Property Code and other related laws shall be subject to suspension without pay or termination from employment. Specific details governing Computer Software and Copyright Law are found in a separate Circular/Directive.



11. SOCIAL MEDIA POLICY

- 11.1. InLife Health Care not only respects but encourages the exercise by its employees of their freedom of speech and expression especially on matters affecting society. However, all employees are expected to act responsibly and ensure that their productivity isn't affected by refraining from using social media during office hours for non-business-related purposes.
- 11.2. Whether using one's social media account for business or personal purposes, employees are advised to:
 - 11.2.1. Ensure others know that their opinion or statements do not represent the Company. Employees shouldn't state or imply that their personal opinions and content are authorized or endorsed by the Company unless they really are.
 - 11.2.2. Never share intellectual property like trademarks on a personal account without approval from its owner. Confidentiality policies and laws always apply.
 - 11.2.3. Never post any defamatory, offensive or derogatory content. It may be considered as a violation of the Company's Anti-Harassment policy especially if directed towards colleagues, clients, partners or suppliers.
- 11.3. Employees who are handling corporate social media accounts or speak on the Company's behalf are expected to act carefully and responsibly to protect our Company's image and reputation. Employees should:
 - 11.3.1. Be respectful, polite and patient when engaging in conversations on the Company's behalf. Employees should be extra careful when making declarations or promises towards customers and stakeholders.
 - 11.3.2. Avoid speaking on matters outside their field of expertise when possible. Everyone should be careful not to answer questions or make statements that fall under somebody else's responsibility.
 - 11.3.3. Follow the Company's confidentiality and data protection policies and observe laws on copyright, trademarks, plagiarism and fair use.

DISCIPLINE

Discipline is defined as the ability to act and comply in accordance with the Company's established modes of behavior, rules, systems, policies, procedures and/or standards. A disciplinary problem arises when there is deviation from such rules, etc.

The Company shall maintain discipline in the organization through positive means, which include efforts to motivate and reform concerned employees. If positive disciplinary efforts of the Company are insufficient, the imposition of disciplinary action to concerned employees shall be governed by the following:

1. Non-conformity with Behavioral Norms

Cases falling under this category refer to failure to abide with the expected behavioral norms in the workplace. These include the following:

- Punctuality & observance of working hours and break periods (3.1 including sub-items);
- Attendance (3.2 including sub-items); provided, that in case the employee's unauthorized absence results to monetary loss or damage on the part of the Company or its officers, employees, agents, suppliers and clients, such violation shall be considered as falling under number 3 hereof.
- Dress Code & Identification Cards (3.5)
- Personal visitors & telephone calls (3.6)
- Other Prohibited Acts (3.7 including sub-items)

These shall be dealt with progressive levels of disciplinary actions:

- | | | |
|---------------------------|---|---|
| 1 st violation | - | Counseling and Written reminder |
| 2 nd violation | - | Written warning / Reprimand |
| 3 rd violation | - | Second warning with 5 days suspension without pay |
| 4 th violation | - | Third warning with 15 days suspension without pay |
| 5 th violation | - | Final warning with 30 days suspension without pay |
| 6 th violation | - | Termination of employment |

The number of violations will be refreshed one year from date of last offense or service of penalty, whichever is later.

2. Non-conformity with Performance Standards

Cases under this category refer to failure to deliver the expected outcomes or results in carrying out the functions specified in the employee's job description and individual performance plan. Subject to the gravity of the resulting delay, losses and/or impact of failure to projects and programs of the Company, the appropriate disciplinary action shall be determined by the Human Resources in coordination with the concerned Department and/or Division Head. The disciplinary action for these kinds of violation can range from counseling to termination of employment.

3. Violation of Laws and Company Policies

Cases under this category refer to violations of laws, ordinances and rules and regulations promulgated by competent government authority that has monetary or reputational impact on the Company or its officers, employees, agents, suppliers and clients. As provided under existing labor laws, the imposition of disciplinary action shall be independent of the prosecution for any of such offenses before the regular courts and the results thereof.

Cases under this category also include the following just causes for termination under Article 285 (formerly numbered 282) of the Labor Code:

- a. Serious misconduct or willful disobedience by the employee of the lawful orders of his employer or representative in connection with his work;

- b. Gross and habitual neglect by the employee of his duties;
- c. Fraud or willful breach by the employee of the trust reposed in him by his employer or duly authorized representative;
- d. Commission of a crime or offense by the employee against the person of his employer or any immediate member of his family or his duly authorized representative; and
- e. Other causes analogous to the foregoing.

Cases under this category likewise include violations of Company policies, rules and regulations, directives and procedures other than those specifically listed in number 1 hereof (Non-Conformity with Behavioral Norms). Taking into consideration the resulting monetary or reputational impact on the Company as well as the employee's length of service and number of previous infractions, the appropriate disciplinary action shall be determined by the Human Resources in coordination with the concerned Department and/or Division Head. The disciplinary action for these kinds of violation can range from counseling to termination of employment.



DISCIPLINARY PROCESS

1. **Reporting of the Incident** - The immediate superior of the erring employee, or any other person or employee who has personal knowledge or has personally witnessed any unusual incident, problem or infraction committed by an employee of the Company shall report the same to the Human Resources by submitting an Incident Report with the following information:
 - Name of the Employee Concerned
 - Department/ Division
 - Date and time of the probable incident, violation or case
 - Probable incident, violation or case
 - Occurrence or frequency (if known)
 - Any action already taken by the person making the report
 - Other witnesses (if any)
 - Supporting documents or evidence
 - Other relevant information

2. **Serving of the Infraction Form** – The Human Resources shall evaluate the Incident Report. Depending on the circumstances, it shall issue any of the following:
 - a. **Request to Explain** – A memo served upon an employee if the Incident Report covers a matter which does not appear to be a violation of this Code or any other Company policies, rules and regulations, directives and procedures but nevertheless needs to be addressed. This memo may likewise be served upon any witness of the probable incident, violation or case.
 - b. **Notice to Explain (NTE)/ Show Cause Memo (SCM)** – A notice issued to an employee who appears to have committed an infraction or violation of this Code or any other Company policies, rules and regulations, directives and procedures; to allow him/her to explain in writing and defend him/herself. The NTE/SCM shall include the (i) alleged incident, violation or case; (ii) the specific provision of this Code or any other Company policies, rules and regulations, directives and procedures that has been possibly violated; (iii) a directive to submit a written explanation within a period which shall in no case be less than five (5) days; and (iv) a directive to attend the schedule of administrative hearing (when necessary).
 - c. **Notice of Administrative Hearing** – A notice that may be issued to an employee inviting him/her to attend an administrative conference at a designated date and time, should the Human Resources deem it necessary, to give the employee additional opportunity to defend him/herself.

At its sole discretion, the Company may decide not to hold an administrative hearing in any of the following instances: (i) when there is a clear admission of guilt by the employee; (ii) first and second instances of non-conformity with behavioral norms; (iii) termination due to failure by a probationary employee to meet the standards for regularization; (iv) termination due to abandonment of work (iv) any instance not covered by the twin notice rule.
 - d. **Validation of Explanation and Investigation** – the employee shall be given at least five (5) days from receipt of the NTE/SCM to submit his/her written explanation.
 - i. Failure or refusal of the employee to submit a written explanation shall be interpreted as a waiver of his/her right to defend him/herself.
 - ii. When no administrative hearing is set, the employee may nevertheless request for the conduct of the same. He/she may also engage the services of a counsel of his/her choice and present his/her own witnesses.
 - e. **Review and Decision** – once the investigation is concluded, the case will be deliberated to determine whether the employee is guilty of the charged offense, and if found guilty, the disciplinary action to be imposed.

Taking into consideration the resulting monetary or reputational impact on the Company as well as the employee's length of service and number of previous infractions, the appropriate

disciplinary action shall be determined by the Human Resources in coordination with the concerned Department and/or Division Head.

- i. If found guilty of the charged offense, the employee shall be issued a Notice of Decision containing the facts of the case; the offense committed; the disciplinary action and effective dates of implementation, if applicable; and other relevant conditions such as putting the employee on probation.
 - ii. If found not guilty of the charged offense, the employee shall be issued a Notice of Resolution absolving or clearing him/her of the alleged infraction or offense.
- f. **Implementation of Action** – any of the foregoing notices may be directly served by the Human Resources or it may course the same through the employee's immediate superior.
- g. **Reservations** – Subject to observance of the minimum standards of due process, the Company reserves the right to amend or modify the foregoing procedure should the Company deem it necessary under the circumstances.

The Company also reserves the right to file appropriate criminal or civil actions against erring employees.

DISCIPLINARY ACTIONS

Taking into consideration the resulting monetary or reputational impact on the Company as well as the employee's length of service and number of previous infractions, the Company may impose any or a combination of the following disciplinary actions:

1. **Counseling** - giving advice to the employee concerned through a one-on-one talk where such employee is made aware of his/her violation and is helped to find ways and means to overcome his/her shortcomings. The agreement arrived at during the meeting shall be documented.
2. **Reprimand** – issuing a written memorandum to the erring employee admonishing him/her for violating this Code or any other Company policies, rules and regulations, directives and procedure.
3. **Warning** – issuing a memorandum to the erring employee instructing him/her to refrain from making similar or other violations with warning that any other violation shall be subjected to a more severe disciplinary action.
4. **Suspension** - instruction to the erring employee to temporarily desist from reporting to work and coming to the office and/or its premises. The said suspension shall be without pay such that the employee shall not be entitled to any salary and fringe benefits during the period.
5. **Financial Restitution** – when loss, damage or liability is suffered by the Company as a result of the offense, the employee shall be required to pay the amount equivalent, in whole or in part, to such loss, damage or liability. For this purpose, employees acknowledge that the Company shall have the **AUTHORITY TO SET OFF** or otherwise deduct the said amount from one's remuneration (which includes salary, profit share, bonuses or incentives, holiday/vacation pay and other entitlements).
6. **Termination** - permanent dismissal from employment when the Company determines that the employee's continued employment is prejudicial to its interests. In such case, the employee shall not be entitled to separation pay nor to the fringe benefits granted by the Company.

MISCELLANEOUS PROVISIONS

1. **Habitual Delinquency** - The Company shall strictly monitor the employee's compliance with any provision of this Code as well as other Company policies, rules and regulations, directives and procedures.
2. **Confidentiality of Proceedings** - Any employee who suspects that a violation of this Code or other Company policies, rules and regulations, directives and procedures has been committed, is being committed or is attempted to be committed, should immediately notify his immediate superior or the Head of the Human Resources, and should not attempt to personally conduct investigations, interviews and/or interrogations related thereto.

All records of the proceedings, especially during the preliminary stages, shall be kept confidentially. Investigation results shall not be disclosed or discussed with anyone other than those who have a legitimate need to know. This is important in order to avoid irreparably damaging the reputation of persons suspected but subsequently found innocent of wrongful conduct and to protect the Company from any potential liability.

3. **False Report** - Should the Head of Human Resources determine that an employee (i) knowingly submitted a report containing false allegations or (ii) presented fabricated evidence, such employee shall be subjected to disciplinary action, without prejudice to any other legal action.
4. **Review of Policies** - The Head of Human Resources Department, with the assistance of the Legal Department, shall be responsible for the administration, revision, interpretation, and application of this Code and other Company policies, rules, directives and procedures. Review and revision may be done, as needed and/or annually, subject to ratification by the Company's Board of Directors.
5. **Corporate Recording and Monitoring** - The Head of Human Resources shall maintain a register containing all concerns under this Code or other Company policies, rules, directives and procedures that are brought to his/her attention for records purposes. These records may be kept as long as needed for future reference.

An annual report for such concerns shall be submitted to the Management Committee and the Board of Directors for proper policy identification and/or changes. The report should include a summary of the concerns raised, to which department they relate, and any applicable recommendations.

In producing the Annual Report, names of the parties involved shall be anonymized.

6. **Separability** - If any provision of this Code is held to be unenforceable or invalid by an office, tribunal or court of competent jurisdiction, such provision shall be deemed severed and shall not affect the validity or enforceability of the remaining provisions.
7. **Non-Waiver** - The failure or delay of the Company or its officers to enforce any provision of this Code or other Company policies, rules and regulations, directives and procedures shall not be construed as a waiver or limitation of its right to subsequently enforce and compel strict compliance.

Occupational
Safety &
Health



WORKPLACE POLICY AND PROGRAM ON PROMOTING WORKERS' HEALTH AND ENSURING PREVENTION AND CONTROL OF HEALTH-RELATED ISSUES AND ILLNESSES

InLife Health Care is committed to promote and ensure a healthy and safe working environment through its various health programs for its employees. We shall always conform to issuances and laws that guarantee employees' health and safety.

InLife Health Care shall ensure that employees' health is maintained through the following company programs and activities:

- a. Orientation and education of employees
- b. Access to reliable information on illness and hazards at work
- c. Referral to medical experts for diagnosis and management of illness or health-related concerns
- d. Health-related programs are made available to the workers.

The above-mentioned programs shall comply with the government's issuances on promoting healthy lifestyle, addressing mental health in the workplace and preventing and controlling substance abuse.

In addition, company policies to protect employees' rights arising from illness shall be guaranteed. The company shall promote the following employees' rights:

- a. Confidentiality of information (See: Code of Discipline on Confidentiality and Privacy Manual);
- b. Non-discrimination (See: Code of Conduct & Gender Sensitivity Manual).

This policy is formulated for employees' information and guidance.

DRUG-FREE WORKPLACE POLICY AND PROGRAM

In compliance with Article V of Republic Act No. 9165, otherwise known as the Comprehensive Dangerous Drugs Act of 2002 and its Implementing Rules and Regulations, and DOLE Department Order No. 53-03, series of 2003 (Guidelines for the Implementation of a Drug-Free Workplace Policies and Programs for the Private Sector), InLife Health Care hereby adopts the following policies and programs to achieve a drug-free workplace:

1. **Company Policy on Drug-Free Workplace** - InLife Health Care explicitly prohibits:
 - 1.1 The use, possession, solicitation for, or sale of dangerous drugs on company premises or while performing one's duty or assignment.
 - 1.2 Being impaired or under the influence of dangerous drugs away from the company, if such impairment or influence adversely affects the employee's work performance, the safety of the employee or of others, or puts at risk the company's reputation.
 - 1.3 Possession, use, solicitation for, or sale of dangerous drugs away from the company premises, if such activity or involvement adversely affects the employee's work performance, the safety of the employee or of others, or puts at risk the company's reputation.
 - 1.4 The presence of any detectable amount of dangerous drugs in the employee's system while at work, while on the premises of the company, or while on company business. "Dangerous Drugs" include those listed in the Schedules annexed to the 1961 Single Convention on Narcotic Drugs, as amended by the 1972 Protocol, and in the Schedules annexed to the 1971 Single Convention on Psychotropic Substances as enumerated in the attached annex of R.A. 9165.
2. **Company Program on Drug-Free Workplace**
 - 2.1 **Mandatory Drug Test** - To ensure that only those qualified shall be screened and recruited to prevent the detrimental effects (*e.g. lower productivity; poor decision making; increased accidents; more compensation claims; and reduced team effort*) which drug use and abuse may cause in the workplace, the conduct of mandatory drug test may be required for pre-employment.
 - 2.2 **Random Testing** - Employees may be selected at random for drug testing at any interval determined by the Company.

- 2.3 **For Cause Testing** –The Company may ask an employee to submit to a drug test at any time it feels that the employee may be under the influence of drugs, including, but not limited to, the following circumstances: evidence of drugs on or about the employee’s person or in the employee’s vicinity, unusual conduct on the employee’s part that suggests impairment or influence of drugs, negative performance patterns, or excessive and unexplained absenteeism or tardiness.
- 2.4 **Post-Accident Testing** – Any employee involved in a “Near-Miss” incident or “Work Accident” under circumstances that suggest possible use or influence of drugs may be asked to submit to a drug test. As defined herein, “Near-Miss” means an incident arising from or in the course of work which could have led to injuries or fatalities of the workers and/or considerable damage to the employer had it not been curtailed. “Work Accident” refers to unplanned or unexpected occurrence that may or may not result in personal injury, property damage, work stoppage or interference or any combination thereof of which arises out of and in the course of employment.
3. All drug tests shall employ, among others, two (2) testing methods, the screening test which will determine the positive result as well as the type of the drug used and the confirmatory test which will confirm a positive screening test. Where the confirmatory test turns positive, the Company’s Assessment Team shall evaluate the results and determine the level of care and administrative interventions that can be extended to the concerned employee.
 4. The Company shall inform the employee who was subjected to a drug test of the test-results whether positive or negative.
 5. All costs of drug testing shall be borne by the Company; provided, that in case the test-result yields positive, such costs may be charged, in whole or in part, to the employee. For this purpose, employees acknowledge that the Company shall have the **AUTHORITY TO SET OFF** or otherwise deduct the said amount from the employee’s remuneration (which shall include salary, bonuses or incentives, holiday/vacation pay and other entitlements).
 6. **Treatment, Rehabilitation and Referral** – An employee who voluntarily submits him/herself for drug use, for the first time, shall be referred for treatment and/or rehabilitation in a DOH accredited center. For this purpose, InLife Health Care shall provide a list of at least three (3) accredited facilities which an employee who was tested positive for drugs may choose from.
 7. Following rehabilitation, the company’s Assessment Team, in consultation with the head of the rehabilitation center, shall evaluate the status of the drug dependent employee and recommend to the Company the resumption of the employee’s job if he/she poses no serious danger to his/her co-employees and/or the workplace.
 8. All costs for the treatment and rehabilitation of the drug dependent employee shall be charged to his account. The period during which the employee is under treatment or rehabilitation shall be considered as authorized leaves without pay; provided, that the employee may apply any of his/her available leave credits.
 9. Any employee who uses, possesses, distributes, sells or attempts to sell, tolerates, or transfers dangerous drugs or otherwise commits other unlawful acts as defined under Article II of RA 9165 and its Implementing Rules and Regulations shall be subject to the pertinent provisions of the said Act. Furthermore, any employee found positive for use of dangerous drugs shall be dealt with administratively in accordance with the provisions of the Company’s Code of Conduct.

SMOKE-FREE WORKPLACE POLICY AND PROGRAM

1. **Purposes** - Pursuant to Section 6 of Republic Act No. 9211 which specifically prohibits indoor smoking and protects people against secondhand smoke, this Company Policy is hereby issued to protect its employees, agents, suppliers, clients and other stakeholders against the hazards brought about by smoking.

Smoke-free workplaces protect non-smokers from the dangers of secondhand smoke and also encourage staff to either quit smoking or reduce their cigarette consumption. Successful implementation of this policy will depend on both the management and employees support.

2. **Implementation** - Worksite smoking policies aim mainly to protect non-smokers from Environmental Tobacco Smoke, (ETS), while the objective of worksite cessation program is to help employees who do smoke to give up the habit. The use of support groups of former smokers, Human Resources staff, and medical staff that may act as educators/counsellors and support for workers to enable them in their wish of quitting the habit. Internally, physical activity, nutrition, and stress management will assist smokers to quit and to stay abstinent.
3. **Prohibition** - Employees are strictly prohibited from smoking (including e-cigarettes) within Company premises.
4. **Referrals** - Employees who wish to quit smoking shall be referred by the OSHC to DOH accredited smoking cessation clinics.

WORKPLACE POLICY AND PROGRAM ON TUBERCULOSIS (TB) PREVENTION AND CONTROL

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

1. **Purposes** - To address the stigma attached to TB and to ensure employees' right against discrimination, brought by the disease, is protected; and to facilitate free access to anti-TB medicines of affected employees through referrals.
2. **Implementing Structure** - The InLife Health Care TB Program shall be managed by its Occupational Safety and Health Committee (OSHC) which consists of representatives from the different divisions and departments.
3. **Coverage** - This Program shall apply to all employees regardless of their employment status, rank or position.
4. **Preventive Strategies**
 - 4.1 **Conduct of TB Advocacy, Training and Education** - TB education shall be conducted by the Company's Clinic in close coordination with the OSHC, through distribution and posting of IEC materials and counselling and/ or lectures.
 - 4.2 Engineering measures such as improvement of ventilation, provision for adequate sanitary facilities and observance of standard for space requirement (avoidance of overcrowding) shall be implemented.
5. **Screening, Diagnosis, Treatment and Referral to Health Care Services**
 - 5.1 InLife Health Care has an established referral system and provides access to diagnostic and treatment services for its employees.
 - 5.2 InLife Health Care adheres to the DOTS guidelines on diagnosis and treatment of TB.
6. **Medical Management** - InLife Health Care adopts the DOTS strategy in the management of workers with tuberculosis. TB case finding, case holding and Reporting and Recording shall be in accordance with the Comprehensive Unified Policy (CUP) and the National Tuberculosis Control Program.
7. **Non-discriminatory Policy and Practices**
 - 7.1 There shall be no discrimination of any form against employees on account of their TB status.
 - 7.2 Workplace management of sick employees shall not differ from that of any other illness. An employee with TB related illnesses shall be allowed to work for as long as medically fit and

his/her work shall not pose danger to him/herself and/of other persons. Otherwise, the authorized cause provisions of the Labor Code shall apply.

8. **Compensation** - InLife Health Care commits to provide access to Social Security System and Employees Compensation benefits under PD 626 to an employee who acquired TB infection in the performance of his/her duty.
9. **Employer's Responsibilities** - InLife Health Care through the Occupational Safety and Health Committee, shall:
 - 9.1 Provide information, education and training on TB prevention for its workforce;
 - 9.2 Ensure non-discriminatory practices in the workplace;
 - 9.3 Ensure confidentiality of the health status of its employees, agents, suppliers, clients and other stakeholders, and access to medical records is limited to authorized personnel.
10. **Employee's Responsibilities** - Employees shall:
 - 10.1 Not commit any discriminatory act against other persons on account of their TB status;
 - 10.2 Not access personal data relating to another person's TB status unless there is prior authorization and there is a legitimate need therefor.
 - 10.3 Comply with universal precaution and the preventive measures.

HIV/AIDS WORKPLACE POLICY AND PROGRAM

1. **Purposes** - In conformity with Republic Act No. 11166 otherwise known as the Philippine HIV and AIDS Policy Act, and the Philippine National Aids Council Resolution No. 1, series of 2019, which recognize workplace-based programs as a potent tool in addressing HIV/AIDS as an international pandemic problem, this company policy is hereby issued for the information and guidance of the employees in the diagnosis, treatment and prevention of HIV/AIDS in the workplace. This policy is also aimed at addressing the stigma attached to HIV/AIDS and ensures that the employees' right against discrimination and right to confidentiality are maintained.
2. **Implementing Structure** - The InLife Health Care HIV/AIDS Program shall be managed by its Occupational Safety and Health Committee (OSHC) which consists of representatives from the Company's different divisions and departments.
3. **Basic Information on HIV/AIDS**
 - 3.1 **What is HIV/AIDS?** It is a disease caused by a virus called HIV (Human Immunodeficiency Virus). This virus slowly weakens a person's ability to fight off other diseases by attaching itself to and destroying important cells that control and support the human immune system.
 - 3.2 **How is HIV transmitted?** HIV is transmitted through unprotected sex with an HIV infected person; from an infected mother to her child; intravenous drug use with contaminated needles; transfusion with infected blood and blood products; and unsafe, unprotected contact with infected blood and bleeding wounds of an infected person.
 - 3.3 **Is there a cure?** None. However, there are antiretroviral drug combinations that are available when properly used result in good quality of life of people with HIV.

Furthermore, according to the 2018 Explainer of the Joint United Nations Programme on HIV and AIDS (UNAIDS, HIV treatment is highly effective in reducing the transmission of HIV. The evidence is now clear that people living with HIV with an undetectable viral load cannot transmit HIV sexually.
4. **Coverage** - This Program shall apply to all employees regardless of their employment status.



5. **Conduct of HIV/AIDS Education** - The OSHC shall organize HIV/AIDS education to all employees for free. The standardized information package developed by the Department of Labor and Employment (DOLE) may be used for this purpose.
6. **Screening, Diagnosis, Treatment and Referral to Health Care Services**
 - 6.1 Screening for HIV as a prerequisite to employment is not mandatory.
 - 6.2 The Company encourages positive health seeking behavior through Voluntary Counseling and Testing.
 - 6.3 The Company has an established referral system and provides access to diagnostic and treatment services for its employees. Referral to Social Hygiene Clinics of LGU for HIV screening shall be facilitated by the Company's medical clinic staff.
7. **Non-discriminatory Policy and Practices**
 - 7.1 Discrimination in any form from pre-employment to post-employment, including hiring, promotion or assignment, termination of employment based on the actual, perceived or suspected HIV status of an individual is prohibited. Provided, that in case HIV has progressed to AIDS and the continued employment of the employee who suffers from an opportunistic infection becomes prejudicial to his/her health or to his/her co-employees, the case shall be treated as falling under Art. 286 (formerly numbered 284) of the Labor Code.
 - 7.2 Workplace management of sick employees shall not differ from that of any other illnesses.
 - 7.3 Discriminatory acts against people with actual, suspected or perceived HIV are strictly prohibited.
8. **Confidentiality/ Non-Disclosure Policy**
 - 8.1 Access to personal data relating to an employee's HIV status shall be bound by the rules of confidentiality consistent with provisions of the Philippine HIV and Aids Policy Act, the Data Privacy Act, the ILO Code of Practice and the Company's Privacy Manual.
 - 8.2 Job applicants and employees shall not be compelled to disclose their HIV/AIDS status and other related medical information unless there is a bona fide occupational requirement therefor. In such case, any information provided by the job applicant or employee shall be kept in strict confidence and shall not be used against him/her.
 - 8.3 Employees shall not be obliged to reveal any personal information relating to the HIV/AIDS status of other persons.
9. **Work Accommodation and Arrangement** - The Company shall take measures to reasonably accommodate employees with HIV/AIDS related illnesses.
10. **Employer's Responsibilities** - InLife Health Care through the Occupational Safety and Health Committee, shall:
 - 10.1 Provide information, education and training on HIV/AIDS;
 - 10.2 Ensure non-discriminatory practices in the workplace;
 - 10.3 Ensure confidentiality of the health status of the Company's employees, agents, suppliers, clients and other stakeholders, and access to medical records is limited to authorized personnel;
 - 10.4 Undertake an active role in educating and training employees on HIV prevention and control;
 - 10.5 Promote and practice a healthy lifestyle with emphasis on avoiding high risk behavior and other risk factors that expose them to increased risk of HIV infection.
11. **Employee's Responsibilities** - Employees shall:
 - 11.1 Not commit discriminatory acts against other persons on account of their actual, perceived or suspected HIV status;
 - 11.2 Not access data relating to another person's actual, perceived or suspected HIV status unless there is prior authorization and there is a legitimate need therefor.
 - 11.3 Comply with universal precautions and preventive measures;
 - 11.4 Not make false and misleading claims about HIV/AIDS in any form of media including traditional media, internet and social media platform.

WORKPLACE POLICY AND PROGRAM ON HEPATITIS B

1. **Purposes** - InLife Health Care promotes and ensures a healthy environment through its various health programs to safeguard its employees.

As part of the Company's compliance to DOLE Department Advisory No. 05, Series of 2010 (Guidelines for the Implementation of a Workplace Policy and Program on Hepatitis B), this Program has been developed. This program is aimed to address the stigma attached to hepatitis B and to ensure that the employees' right against discrimination and right to confidentiality are maintained.

This guideline is formulated for everybody's information and reference for the diagnosis, treatment, and prevention of Hepatitis B. This will inform the employees of their role as well as the company in dealing with Hepatitis B. A healthy environment encompasses a good working relationship and great output for continuous business growth.
2. **Implementing Structure** - InLife Health Care's Hepatitis B workplace policy and program shall be managed by its Occupational Safety and Health Committee (OSHC).
3. **Education**
 - 3.1 All employees regardless of employment status may avail of Hepatitis B education services for free;
 - 3.2 Hepatitis B education shall be conducted through distribution and posting of IEC materials and counselling and/ or lectures.
4. **Preventive Strategies**
 - 4.1 All employees are encouraged to be immunized against Hepatitis B after securing clearance from their physician.
 - 4.2 Workplace sanitation and proper waste management and disposal shall be monitored by the OSHC on a regular basis;
 - 4.3 Personal protective equipment shall be made available at all times for all employees; and
 - 4.4 Employees will be given training and information on adherence to standards or universal precautions in the workplace.
5. **Non-discriminatory Policy and Practices**
 - 5.1 There shall be no discrimination of any form against employees based on their Hepatitis B status consistent with the international agreements on non-discrimination ratified by the Philippines (ILO C111).
 - 5.2 Employees shall not be discriminated against, from pre to post employment, including hiring, promotion, or assignment because of their hepatitis B status.
 - 5.3 Workplace management of sick employees shall not differ from that of any other illnesses.
 - 5.4 Persons with Hepatitis B related illnesses may work for as long as they are medically fit to work.
6. **Confidentiality/ Non-Disclosure Policy**
 - 6.1 Access to personal data relating to an employee's Hepatitis B status shall be bound by the rules of confidentiality consistent with provisions of the Data Privacy Act and the Company's Privacy Manual.
 - 6.2 Job applicants and employees shall not be compelled to disclose their Hepatitis B status and other related medical information unless there is a bona fide occupational requirement therefor. In such case, any information provided by the job applicant or employee shall be kept in strict confidence.
 - 6.3 Employees shall not be obliged to reveal any personal information relating to the Hepatitis B status of other persons.
7. **Non-discriminatory Policy and Practices**
 - 7.1 There shall be no discrimination of any form against employees on account of their Hepatitis B status.

- 7.2 Workplace management of sick employees shall not differ from that of any other illness. An employee with Hepatitis B shall be allowed to work for as long as medically fit and his/her work shall not pose danger to him/herself and/or other persons. Otherwise, the authorized cause provisions of the Labor Code shall apply.
8. **Compensation** - InLife Health Care commits to provide access to Social Security System and Employees Compensation benefits under PD 626 to an employee who acquired Hepatitis B in the performance of his/her duty.
9. **Employer's Responsibilities** - InLife Health Care through the Occupational Safety and Health Committee, shall:
- 9.1 Provide information, education and training on Hepatitis B prevention for its workforce;
 - 9.2 Ensure non-discriminatory practices in the workplace;
 - 9.3 Ensure confidentiality of the health status of its employees, agents, suppliers, clients and other stakeholders, and access to medical records is limited to authorized personnel.
10. **Employee's Responsibilities** - Employees shall:
- 10.1 Not commit any discriminatory act against other persons on account of their Hepatitis B status;
 - 10.2 Not access personal data relating to another person's Hepatitis status unless there is prior authorization and there is a legitimate need therefor.
 - 10.3 Comply with universal precaution and the preventive measures.



POLICY ON TIME & ATTENDANCE

- 1. **Statement of Policy** - Our Company requires its employees to strictly adhere to work schedules to maximize total work productivity and efficiency as required by the business.
- 2. The Company may modify established working hours in response to the exigencies of the Company’s business operations and the changing situations in the environment, subject to existing laws and government rules and regulations.
- 3. **Personnel Covered** - This Policy shall apply to all employees of the Company.
- 4. **Guidelines**

- 4.1 **Work Schedule** - The regular workday during weekdays (i.e. Monday to Friday) shall consist of eight (8) productive hours per day while workday during Saturdays shall consist of four (4) productive hours. Specific work schedules other than the regular working hours as stated in this Policy may be established by the Company for certain groups of employees in accordance with its business and operating requirements. The established work schedules shall be subject to a periodic review or as the exigencies of the business may require.
- 4.2 **Rest day** - The Company shall provide all employees with at least one (1) rest day per week.
- 4.3 All employees are required to strictly observe their prescribed work schedules to ensure smooth flow of operations in their respective units. Work schedules shall be established in accordance with the specific business and operating requirements of the Company.
- 4.4 Reporting managers, in coordination with Human Resources Department (HRD), shall establish the specific work schedules of their personnel/staff taking into account the operational requirements and manpower complement of their units, subject to the prior approval of the Operations Head.
- 4.5 **Home Office** - The work schedules to be established for employees in the Home Office may be any of the following:

Mondays to Fridays	Saturdays
7:30 AM to 12:00 NN** and 1:00 PM to 4:30 PM**; or	8:00 AM to 12:00 NN*
8:00 AM to 12:00 NN and 1:00 PM to 5:00 PM;	8:00 AM to 12:00 NN*

- 4.6 **Home Office Units with 16- or 24-Hour Continuous Operations (Shift Work Schedules)** - The following work schedule shall be observed in the Home Office units with 16- or 24-hour operations:

Shift	Work Schedule
First Shift	6:00 AM to 2:00 PM
Second Shift	2:00 PM to 10:00 PM
Third Shift	10:00 PM to 6:00 AM

- 4.7 **Provincial-based Employees** - The work schedule established in the Field Offices shall be:

Mondays to Fridays	Saturdays
8:00 AM to 12:00 NN and 1:00 PM to 5:00 PM	8:00 AM to 12:00 NN*

- 4.8 **Saturday Work** - Employees may be required by their superiors to work on Saturdays when the exigencies of the business require. Work rendered on a Saturday are deemed included in the employees’ monthly compensation.

- 4.9 In special cases where the operational requirements of the employee's work unit would require a different work schedule, changes in existing work schedules or the establishment of special working schedules may be effectuated in coordination with the Human Resources.
- 4.10 Employees pursuing further education are urged to take class schedules which are not in conflict with their prescribed work schedules. Employees enrolled in review classes for licensure examinations, however, will be given special consideration.
- 4.11 All employees must always have a prescribed official work schedule for stability in the operations of his work unit and for the maintenance of discipline in the organization.

- 5. **Break Periods** – Punctuality also means observance of the prescribed break periods during office hours. Such break periods shall be established by the Company in accordance with its operating requirements. As a general rule, employees are given a one (1) hour unpaid lunch break and may take a fifteen (15) minute paid break period each in the morning and in the afternoon.

For those on an eight (8) hour continuous shift schedule, a 30-minute paid break shall be allowed.

- 5.1 As a general rule, a one (1) hour break is provided in the Company's work schedules for its employees for their meal (lunch) period which shall be observed from 12:00NN to 1:00 PM.
- 5.2 For employees in work units where rendering of continuous service to clients is required, their meal (lunch) period shall be scheduled by their immediate superior, and approved by their Operations Head in accordance with the operating requirements and actual personnel complement of the unit.
- 5.3 Habitual prolonging of break periods of an employee is subject to appropriate disciplinary action in accordance with the Company rules and regulations.

- 6. **Shift Work Schedules** – Shift work schedules are based on continuous operation requirements of the work unit. A 30-minute paid break time within the shift schedule shall be provided to employees concerned.
- 7. **Timekeeping** – All employees are required to personally register their clock-in and clock-out every day, using the "HR2". The official summary of an employee's attendance record shall be the basis for his/her payroll.

- 8. **Absences, Tardiness and Official Business**

- 8.1. **Leaves of Absence** – Every employee is required to immediately notify his/her superiors of his/her absence:
 - 7.1.1 **For Sick Leave/ Emergency Leave** – Within 2 hours from the start of work schedule.
 - 7.1.2 **For Vacation Leave** – At least five (5) working days prior to scheduled leave.
- 8.2. For continuous leave requests crossing over the weekend, the Human Resources automatically computes the half (½) day Saturday working hours.
- 8.3. Every employee is responsible to file the appropriate leave request through the "HR2". Such leave application shall be subject to the approval of the immediate superior in accordance with applicable Company policies. Any incomplete time transactions will be considered Leave Without Pay (LWOP) and will be subject to salary deduction on the applicable payroll period.
- 8.4. **Grace Period & Tardiness** – Until officially changed and subject to the prevailing circumstances (environmental situation), an employee is tagged late when he/she clocks in after more than 30 minutes from his/her prescribed work schedule. This guideline does not apply to those directly servicing clients and who are expected to be at their work area at the start of business hours.
- 8.5. **Salary deduction** – salary deductions shall be made in the following instances:
 - 8.5.1 The employee clocks in beyond 30 minutes from his/her prescribed work schedule; in such case, the grace period shall be disregarded and salary deduction on tardiness is computed starting from his/her prescribed working hour.
 - 8.5.2 The employee does not complete the prescribed 9 hours (inclusive of 1-hour lunch break) in his/her time transaction.

- 8.6. Immediate superiors shall be responsible for tracking the tardiness frequency of his/her team members.
- 8.7. The immediate superiors are enjoined to employ positive discipline in addressing habitual tardiness before resorting to disciplinary action.
- 8.8. **Official Business** – Official business (OB) trips outside office premises are counted as worked hours. An employee on official business should request and file his/her OB through the HR2, subject to the approval of the immediate superior.

POLICY ON OVERTIME

1. **Statement of Policy** - Our Company grants premium pay to employees who render authorized work beyond the required eight (8) hours, or on public holidays, and during rest days to comply with the mandatory labor standards on overtime work.
2. **Personnel Covered** - All probationary or regular employees below manager job grade, and project-based personnel.
3. **Definition of Terms**
 - 3.1 **Overtime Work** – work rendered by covered employees beyond the required eight (8) hours or on public holidays, or during rest days with approval by their immediate superior.
 - 3.2 **Premium Pay** – additional compensation paid to covered employees for rendering authorized work for the first eight (8) hours during public holidays and rest days.
 - 3.3 **Overtime Pay** – additional compensation paid to covered employees for rendering authorized work beyond the first eight (8) hours during regular workdays, public holiday and rest days.
 - 3.4 **Project-based Personnel** – refer to individuals who are directly engaged by the Company for specific projects with defined timeline and deliverables.
 - 3.5 **Rest day** – refers to the rest period of not less than twenty-four (24) consecutive hours after every six (6) consecutive normal workdays.
4. **Guidelines**
 - 4.1 **Overtime Approval**
 - 4.1.1 Management is accountable for proper and adequate planning of work activities of their respective units. Overtime work should be the last resort to ensure continuous business operations and prevent losses. Unit heads must always consider Saturday (8:00AM to 12:00NN), a regular work schedule, as first option in lieu of overtime. If the Saturday duty is not enough to cover the workload, unit heads may then request for overtime for any of the following reasons:
 - 4.1.1.1 Work cannot be done during the regular working hours;
 - 4.1.1.2 There is an extraordinary increase in the volume of work;
 - 4.1.1.3 Deadline must be met; and
 - 4.1.1.4 Losses will be incurred if overtime work is not resorted to.
 - 4.1.2 Overtime requests must be approved by the respective Operations Head. As a general rule, management should exercise prudence and proper judgment in requiring employees to render overtime work.

4.2 Premium/ Overtime Rates for Staff

- 4.2.1 The following are the premium rates for the first eight (8) hours of authorized work during rest days and public holidays.

Classification of Days Worked	Premium Rate + Overtime Rate
Rest Day/Company Time-off	130
Special Holiday	130
Rest Day a Special Holiday	150
Regular Holiday	200
Rest Day a Regular Holiday	260

- 4.2.2 The following are the premium and overtime rates for authorized work beyond the first eight (8) hours:

Classification of Days Worked	Premium Rate + Overtime Rate
Regular Workday	125
Rest Day /Company Time-off	169
Special Holiday	169
Rest Day a Special Holiday	195
Regular Holiday	260
Rest Day a Regular Holiday	338

- 4.2.3 Rest day rates shall be adopted for work rendered on Company-declared holidays. These can include but not limited to the following:

4.2.3.1 Situations brought about by force majeure like typhoons, floods and earthquake.

4.2.3.2 Company time-off or traditional Company holidays such as Holy Wednesday (half day).

- 4.2.4 **Meal Allowance for Supervisory Personnel** – Meal allowance of Two Hundred Pesos (P200) per hour, subject to tax, shall be paid for authorized work rendered on holidays, rest days and Company time-off, and work rendered beyond the regular working hours by supervisory employees.

- 4.2.5 Rest day rates shall be adopted for work rendered on Company-declared holidays. These can include but not limited to the following:

4.2.5.1 Situations brought about by force majeure like typhoons, floods and earthquake.

4.2.5.2 Company time-off or traditional Company holidays such as Holy Wednesday (half day).

4.3 Break Periods During Overtime

4.3.5 A break period of fifteen (15) minutes (paid) shall be allowed during overtime duty.

4.3.6 On Saturdays, Sundays and holidays, a one-hour (unpaid) time-off shall be given for the regular meal.

- 4.4 **Presence at the Workplace during Overtime** – Employees who are required to render overtime work are expected to stay in their designated workplace and to completely perform the tasks assigned to them.

- 4.5 **Overtime Status** – Employees who were permitted to render overtime work may be required by their superior to submit a status report, at any given time, to assess if the agreed outputs are met. The immediate superior may recommend necessary actions if there are deviations.

4.6 Miscellaneous Provisions

4.6.1 Employees may render overtime work only if they have completed the required eight (8) hours of work on regular workdays. Management shall exercise prudence and proper judgment in requiring employees who reported late for work on a particular day to render overtime work on such day.

- 4.6.2 Overtime work should not be less than one (1) hour on any given instance. Overtime work on Saturdays should start at least at 12:30 pm. Management shall be accountable for ensuring that authorized overtime hours are not excessive as to hamper employees' productivity.
- 4.6.3 In case of early dismissal due to force majeure, overtime will start at the end of approved early dismissal.
- 4.6.4 No employee may be asked or required to take time-off from his/her regular work schedule in lieu of overtime.

4.7 Procedure

- 4.7.1 Unit Heads must request for approval for their staff to render overtime work from their respective Operations Heads through the prescribed OT form to which the concerned Operations Head must signify his/her approval. The following details are provided in the request for OT:
 - 4.7.1.1 Justification of the overtime work, stating the urgency and necessity for overtime and adverse effects if not approved;
 - 4.7.1.2 Budget Code where the OT expenses will be charged;
 - 4.7.1.3 Duration of OT work to be rendered and type of work to be done;
 - 4.7.1.4 Names of employees who will render OT work and their corresponding assigned tasks for completion.
- 4.7.2 The Unit Heads shall notify their staff of the approved OT so that they can adjust their personal schedules and commitments. However, for emergency cases, employees may be required to render overtime work without prior notice.
- 4.7.3 Employees authorized to render OT work shall then submit their approved OT form to the Human Resources on or before payroll cut-off (every 16th and 1st of the month). OT payment will be credited to the employee's (staff & supervisory level) respective salaries the following payroll.

PAPERLESS POLICY

1. **Background** - To produce 500 reams of paper, twenty trees are cut and 100,000 liters of water are used, water that is no longer reusable because it is laden with chemicals and is just released to the environment to poison our rivers and seas. Accordingly, there is a need to cut the use of excessive quantities of costly paper, save our forests, avoid landslides, and mitigate the worsening effects of climate change that the world is experiencing (A.M. No. 11-9-4-SC or the Efficient Use of Paper Rule).
2. **Purposes** - Acknowledging its vital role in nation building and in helping save the environment, InLife Health Care acts responsibly to avoid any negative environmental impact. As such, InLife Health Care promotes a paperless culture and aims to reduce incoming paper to our offices to as close to zero as possible by promulgating this Paperless Policy.
3. **Electronic Documents** - As far as practicable, employees shall refrain from printing and using paper, and shall produce, share and/or store documents electronically in accordance with Republic Act No. 8792, otherwise known as the Electronic Commerce Act.
4. **Hard copies; when required** - Unless otherwise directed by the Company, hard copies shall be produced, shared and/or stored only in the following instances:
 - 4.1 When hard copies are required by law, rule or regulation;
 - 4.2 When dealing with regulatory bodies such as, but not limited to: the Insurance Commission, the Securities and Exchange Commission, the Bureau of Internal Revenue, the Department of Health, and Local Government Units.
 - 4.3 Contracts, memoranda and other documents with significant financial impact on the Company;
 - 4.4 Official receipts and financial reports and documents;
 - 4.5 Employment contracts;
 - 4.6 Company manuals, codes, policies, rules and regulations, directives and procedures **when an employee specifically requests for a hardcopy;**
 - 4.7 When specifically requested by a client.
5. **Internal Memos** - Subject to number 4 hereof, internal memos shall be cascaded/ disseminated electronically.



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