

MEDICARE PLUS, INC.

Conduct & Compliance CareBook

A Living Guide to Our Values, Standards & Culture

Every Customer. Every Person. Every Interaction.

Guided by our MCARE values — Mindfulness, Compassion, Accountability, Respect, and Excellence — this CareBook is our shared commitment to a workplace where integrity, trust, and dignity are non-negotiable.

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*Every Customer.
Every Person.
Every Interaction.*

PREAMBLE | A MESSAGE FROM LEADERSHIP

To my MPI Family,

At Medicare Plus, Inc., how we work matters as much as what we accomplish. We exist to serve our patients, clients, and community, and every interaction is an opportunity to show who we are and what we stand for.

This Conduct & Compliance CareBook is more than a rule book. It is our living covenant with one another and our written declaration of the values, behaviors, and standards we commit to uphold as members of the Medicare Plus family.

The MCARE values embodied in this CareBook — Mindfulness, Compassion, Accountability, Respect, and Excellence — are not mere aspirations. They are expectations we set for ourselves as we serve our clients, care for our patients, work with one another, and grow together as one organization.

I ask every member of this organization, from the frontline to the executive, to read this document not merely as a compliance obligation, but as a personal commitment. When we hold ourselves to these standards, we build the kind of organization our patients deserve, our clients can trust, and our people can be proud to be part of.

With gratitude for your commitment,



MARIA JESUSA B. VIRAY

President/CEO

SCOPE: This CareBook applies to all employees of Medicare Plus, Inc. regardless of employment status (probationary, regular, or fixed-term), within company premises or while performing official duties outside the premises, and in digital environments including official email, chat systems, and company software platforms.

PART I | OUR MCARE VALUES — THE FOUNDATION

Our MCARE values are not theoretical ideals — they are the behavioral DNA of Medicare Plus. Each value is defined by specific, observable, and enforceable mandatory behaviors that guide every decision, interaction, and act of service. These behaviors apply to everyone, every day.

M

MINDFULNESS — *Be fully present — cultivate integrity, curiosity, and kindness.*

- I promote personal well-being by maintaining healthy work-life balance, planning to meet deadlines, and using breaks appropriately.
- I foster a positive environment by collaborating with my team and others constructively and supportively.
- I communicate problems, concerns, and challenges clearly and fairly — and always contribute to their resolution.
- I comply with all safety protocols and actively ensure all areas are safe for clients, guests, and colleagues.
- I protect confidentiality by limiting discussions to authorized venues and consistently following privacy and data policies.

C

COMPASSION — *Provide outstanding service by anticipating needs and communicating with empathy.*

- I maintain a welcoming posture, use positive gestures, and speak with an empathetic and reassuring tone in all interactions.
- I actively listen to the concerns of clients, guests, and colleagues, and respond with genuine empathy and openness.
- I remain calm in challenging situations, refrain from unnecessary noise, and communicate in ways that reduce anxiety.
- I prioritize the needs of others, address immediate concerns promptly, and keep all stakeholders updated on progress.
- I am friendly, polite, and approachable — smiling, making eye contact, and following MCARE service interaction and recovery protocols.

A

ACCOUNTABILITY — *Wholly support our Mission, Vision, and Values by owning your words and actions.*

- I am diligent and committed to my goals and my team's goals — and I ask for support whenever I need it.
- I remain accessible and readily attend to the needs of clients, guests, and colleagues — helping without being asked.
- I maintain up-to-date knowledge of and adhere to the policies, guidelines, and procedures of my department and the organization.
- I keep my work area clean and actively embrace clean and green practices, including proper waste disposal and 5S principles.
- I take ownership of my errors, correct them promptly, and do not deflect responsibility.

R

RESPECT — *Honor and appreciate the diverse backgrounds and needs of every person.*

- I appreciate and honor the diversity of others — including age, education, culture, sexual orientation, gender identity, religion, race/ethnicity, and physical & mental abilities.
- I practice proper social etiquette
- I wear my ID badge at all times. Without an ID, I wear a temporary badge.
- I avoid disparaging conversations or derogatory language about Medicare Plus, our partners, clients, guests, and colleagues. I provide constructive feedback through proper channels.
- I communicate clearly and listen attentively — using plain language, considering my audience, and welcoming feedback to improve.

E

EXCELLENCE — *Make those I serve my highest priority — pursue continuous improvement always.*

- I actively support organizational improvements — new policies, procedures, and change initiatives — and provide constructive feedback.
- I am proactive in managing challenges and adhere to prescribed escalation processes within my department and the organization.
- I seek and act on feedback, complete required training and development on time, and fulfill all commitments to my supervisors.
- I foster a culture of learning by facilitating understanding and using the teach-back method when sharing knowledge.

BEHAVIORAL STANDARDS: In everything we do, we act with integrity. We foster a climate of honesty and trust. We maintain a mindset for excellence. We are accountable for all our actions and decisions. We demonstrate a passion for meeting the needs of all our stakeholders.



*Every Customer.
Every Person.
Every Interaction.*

Section 1: General Conduct Standards

Medicare Plus, Inc. is committed to maintaining a workplace built on **Mindfulness, Compassion, Accountability, Respect, and Excellence (MCARE)**. These values guide how we serve our members and clients, how we work with one another, and how we protect the trust placed in us as a Health Maintenance Organization.

All employees are expected to observe the following standards of conduct in all work-related settings, whether inside company premises, outside the office while performing official functions, during company-sponsored activities, or in digital and online work environments:

1. Professionalism and Integrity

Employees shall act with professionalism, honesty, transparency, and good faith in the performance of their duties. They shall avoid any conduct that may compromise the interests, reputation, or operations of the Company.

2. Respectful and Dignified Treatment of Others

Employees shall treat all colleagues, members, patients, clients, providers, visitors, suppliers, and third parties with dignity, courtesy, fairness, and respect. Abusive, discriminatory, harassing, intimidating, threatening, or humiliating conduct shall not be tolerated.

3. Confidentiality and Data Privacy

Employees shall protect and keep confidential all member information, patient-related information, medical data, claims records, business data, trade secrets, employee records, client information, provider records, and proprietary documents. Employees shall comply with the Data Privacy Act of 2012, Company privacy policies, and all lawful instructions relating to the handling, access, use, disclosure, retention, and disposal of personal and sensitive personal information.

4. Accountability in the Performance of Duties

Employees shall perform their assigned duties with diligence, competence, care, and efficiency. They are expected to observe company procedures, meet reasonable deadlines, properly document their work, and promptly coordinate matters requiring action, escalation, or approval.

5. Protection of Company Assets and Resources

Employees shall safeguard company property, funds, equipment, records, systems, communication channels, documents, and other resources against loss, damage, waste, misuse, unauthorized use, theft, fraud, or misappropriation. Company assets shall be used only for legitimate business purposes unless otherwise authorized.

6. Compliance with Lawful Policies, Procedures, and Instructions

Employees shall comply with company policies, lawful work rules, reasonable management directives, operational procedures, and applicable standards required in the Company's HMO business, including member servicing, provider coordination, claims processing, utilization reporting, regulatory submissions, and client account management.

7. Conflict of Interest

Employees shall avoid any situation that creates, or appears to create, a conflict between their personal, financial, family, business, or outside interests and the interests of Medicare Plus. Any actual, potential, or perceived conflict of interest must be promptly disclosed to the Company through the appropriate reporting channel.

8. Reporting of Violations and Good-Faith Concerns

Employees are encouraged and expected to report actual or suspected violations of law, company policy, ethical standards, safety rules, data privacy obligations, fraud controls, or compliance requirements through appropriate channels. Reports made in good faith shall be handled with fairness, confidentiality to the extent practicable, and without retaliation.

9. Cooperation with HR, Compliance, and Internal Investigations

Employees shall cooperate honestly and promptly with HR, Compliance, Legal, Audit, Data Privacy, or management-led inquiries, audits, investigations, and disciplinary processes. Employees shall not conceal, falsify, destroy, alter, or withhold relevant records or information.

10. Observance of Workplace Safety and Welfare Standards

Employees shall comply with workplace safety, health, security, and welfare policies. They shall not engage in conduct that endangers themselves, their colleagues, members, patients, visitors, or company operations.

11. Responsible Use of Digital Platforms and Communications

Employees shall use company email, messaging platforms, systems, databases, devices, and other digital tools responsibly and only for legitimate business purposes. Employees shall not use digital platforms to harass, defame, disclose confidential information, spread false information, or engage in conduct prejudicial to the Company, its employees, members, clients, or partners.

12. Compliance with Applicable Laws and Regulations

Employees shall comply with all applicable Philippine laws, rules, and regulations, including the Labor Code of the Philippines, the Data Privacy Act of 2012, the Safe Spaces Act, the Comprehensive Dangerous Drugs Act of 2002, the Revised Penal Code, and other laws and regulations applicable to the Company's business as an HMO.

Section 2: Non-Retaliation Policy

Medicare Plus, Inc. is committed to maintaining a workplace where employees may raise concerns, report suspected violations, and participate in legitimate inquiries without fear of reprisal. Consistent with our MCARE values of **Mindfulness, Compassion, Accountability, Respect, and Excellence**, the Company encourages openness, honesty, and responsible reporting as part of a healthy and compliant organization.

The Company strictly prohibits retaliation against any employee who, in good faith:

1. reports an actual or suspected violation of law, Company policy, this CareBook, ethical standards, safety rules, data privacy obligations, fraud controls, or compliance requirements;
2. raises a workplace concern through Human Resources, Compliance, Legal, management, or any authorized reporting channel;
3. participates, cooperates, or provides information in any internal inquiry, audit, investigation, disciplinary proceeding, or lawful external proceeding; or
4. refuses to participate in any act reasonably believed to be unlawful, unethical, fraudulent, unsafe, or contrary to Company policy.

For purposes of this policy, retaliation includes any adverse, punitive, or intimidating action taken because of an employee's good-faith report, participation, or cooperation. This may include, but is not limited to, unjustified demotion, suspension, reduction of work hours, reassignment, exclusion from work opportunities, harassment, threats, intimidation, coercion, bullying, unjustified negative performance action, or any other act that would discourage a reasonable employee from raising a legitimate concern.

However, this policy does not exempt any employee from accountability for misconduct, poor performance, dishonesty, bad-faith reporting, malicious accusations, knowingly false statements, or violations of Company policy. Reports must be made honestly and in good faith. An employee who knowingly files a false, malicious, or fabricated complaint may be subject to appropriate disciplinary action, after observance of due process.

Human Resources, in coordination with Legal and Compliance, or Management when necessary, shall promptly acknowledge, assess, and act on reports of retaliation. HR shall ensure that concerns are handled with fairness, confidentiality to the extent practicable, proper documentation, timely escalation, and appropriate protective measures when warranted.

Any employee who believes that they have experienced or witnessed retaliation must immediately report the matter to HR, Compliance, Legal, or any authorized officer of the Company. All reports shall be reviewed objectively, and appropriate action shall be taken based on the facts, evidence, gravity of the act, and applicable law.

Retaliation is a serious offense and may result in disciplinary action, up to and including termination, after due notice, hearing or opportunity to be heard, and compliance with applicable labor standards.

WHY THIS MATTERS: The non-retaliation guarantee is the cornerstone of a speak-up culture. Without it, misconduct goes unreported and trust erodes. We protect our reporters to protect our integrity.

Section 3: Conflict of Interest

Medicare Plus, Inc. expects all employees to act with loyalty, integrity, transparency, and sound judgment in the performance of their duties. Consistent with our MCARE values of **Mindfulness, Compassion, Accountability, Respect, and Excellence**, employees must avoid situations where their personal, financial, family, professional, or outside interests may conflict, or appear to conflict, with the best interests of the Company, its members, clients, providers, and partners.

A conflict of interest exists when an employee's personal interest, relationship, outside activity, or financial involvement may influence, or reasonably appear to influence, the employee's objectivity, independence, loyalty, judgment, or performance of official duties.

Employees are required to disclose any actual, potential, or perceived conflict of interest promptly and in writing to their immediate supervisor and the Human Resources Department. Where appropriate, HR may coordinate with Legal, Compliance, Finance, Data Privacy, or Management to assess the disclosure and determine the appropriate action. Disclosure does not automatically constitute a violation. However, failure to disclose a conflict, concealment of relevant information, or participation in a conflicted transaction without clearance may constitute a violation of this policy.

The following acts may constitute a conflict of interest and may be subject to corrective or disciplinary action, depending on the facts and circumstances:

1. engaging in outside employment, consultancy, business, directorship, partnership, agency, or professional activity that competes with, conflicts with, or interferes with the employee's duties to Medicare Plus, without prior written disclosure and approval;
2. directly or indirectly working for, representing, advising, assisting, or having a financial interest in any competitor, supplier, broker, agent, accredited provider, contractor, vendor, or business partner of Medicare Plus, where such involvement may affect the employee's independence or official functions;
3. recommending, endorsing, selecting, accrediting, processing, approving, or influencing Company business in favor of a vendor, supplier, provider, clinic, hospital, contractor, broker, agent, or third party in which the employee, the employee's family member, close personal relation, or business associate has a financial or personal interest;
4. using Company information, member data, patient-related information, client lists, provider networks, pricing, claims data, utilization records, business plans, systems access, or Company relationships for personal gain or for the benefit of another person or entity;
5. accepting, requesting, soliciting, or receiving money, commissions, referral fees, rebates, gifts, favors, entertainment, discounts, sponsorships, or other benefits from members, clients, providers, suppliers, vendors, contractors, brokers, agents, or other third parties in connection with the employee's official duties, except for nominal tokens permitted under Company policy;
6. influencing or participating in the hiring, supervision, evaluation, promotion, discipline, assignment, or compensation of a family member, close personal relation, romantic partner, or person with whom the employee has a significant personal or financial relationship;
7. using Company time, personnel, equipment, facilities, vehicles, funds, systems, official communication channels, or other resources for personal business, outside work, or activities unrelated to Company operations without prior written approval;
8. diverting business opportunities, provider arrangements, client accounts, partnerships, referrals, or other opportunities intended for or available to Medicare Plus for the employee's personal benefit or for the benefit of another person or entity;

9. participating in the review, processing, approval, denial, payment, reimbursement, or settlement of any claim, billing, provider transaction, member request, or client concern where the employee has a personal, family, financial, or outside interest that may affect impartiality;
10. failing to disclose relationships or interests involving accredited providers, hospitals, clinics, laboratories, suppliers, brokers, agents, consultants, or other parties that transact or seek to transact with Medicare Plus.

Upon receipt of a conflict disclosure, HR shall acknowledge and document the report, conduct an initial assessment within a reasonable period, and endorse the matter to the proper department when necessary. The Company may require the employee to refrain from participating in the affected transaction, reassign the matter to another employee, impose safeguards, require divestment or disengagement from the conflicting interest, or issue written clearance subject to conditions.

No employee shall be disciplined solely for making a timely and truthful disclosure in good faith. However, an employee may be held accountable for failing to disclose a conflict, concealing material facts, proceeding with a conflicted transaction without clearance, using Company position or resources for personal gain, or engaging in conduct that causes prejudice to the Company, its members, clients, providers, or partners.

Any corrective or disciplinary action under this policy shall be imposed only after observance of due process, including notice, opportunity to explain or be heard, proper evaluation of evidence, and consideration of the nature, gravity, intent, frequency, resulting damage, and surrounding circumstances of the act.

Section 4: Workplace Respect & Anti-Harassment

Medicare Plus, Inc. is committed to maintaining a workplace where every employee, member, patient, client, provider, visitor, and partner is treated with dignity, fairness, and respect. Consistent with our MCARE values of **Mindfulness, Compassion, Accountability, Respect, and Excellence**, the Company does not tolerate discrimination, harassment, bullying, sexual harassment, violence, intimidation, or any conduct that creates an unsafe, hostile, offensive, or degrading work environment.

This policy applies to all work-related settings, whether inside Company premises, during official business outside the office, in Company-sponsored activities, in dealings with members, clients, providers, suppliers, and partners, and in digital or online workspaces, including email, messaging platforms, social media, video conferences, and other electronic communications.

The following acts are prohibited and may constitute serious misconduct, depending on the nature, gravity, frequency, intent, resulting harm, and surrounding circumstances:

1. Sexual Harassment and Gender-Based Sexual Harassment

Any form of sexual harassment, gender-based sexual harassment, or sexually inappropriate conduct, whether verbal, physical, visual, written, online, or through any other means, as defined and prohibited under applicable laws, including the Anti-Sexual Harassment Act of 1995 and the Safe Spaces Act.

2. Unwelcome Sexual Conduct

Unwelcome sexual advances, requests for sexual favors, sexually colored remarks, jokes, gestures, messages, images, physical contact, or any conduct of a sexual nature that affects employment, creates discomfort, interferes with work, or results in a hostile or offensive environment.

3. Workplace Bullying, Intimidation, or Abuse

Bullying, intimidation, humiliation, verbal abuse, coercion, repeated unreasonable treatment, or any conduct that demeans, threatens, isolates, or undermines another person, whether committed by a superior, subordinate, co-employee, or third party in a work-related setting.

4. Discrimination and Unfair Treatment

Discrimination, exclusion, harassment, or unfair treatment based on age, sex, gender, gender identity or expression, sexual orientation, civil status, pregnancy, religion, race, ethnicity, disability, health condition, socioeconomic status, or any other status protected by law or Company policy.

5. **Physical Violence, Threats, or Coercion**

Physical assault, threats, stalking, intimidation, coercion, aggressive behavior, or any act that endangers, or reasonably causes fear for, the safety, security, or well-being of another person in the workplace or in any work-related setting.

6. **Hostile or Offensive Work Environment**

Any act, language, behavior, display, message, or pattern of conduct that creates an intimidating, hostile, degrading, humiliating, offensive, or unsafe work environment, or that interferes with another person's ability to perform work with dignity and security.

7. **Indecent, Scandalous, or Grossly Improper Conduct**

Indecent, scandalous, or grossly improper conduct committed in a work-related setting, or conduct outside the workplace that has a direct and substantial connection to the employee's work, the Company's operations, workplace relationships, or the reputation and trust reposed in the employee.

8. **Conduct Prejudicial to Workplace Harmony or Company Trust**

Any conduct that seriously embarrasses, humiliates, harasses, or prejudices a co-employee, superior, subordinate, member, client, provider, visitor, or partner, or that materially affects workplace harmony, safety, professional relationships, or the good name of the Company.

All complaints or reports under this section shall be handled promptly, fairly, and with sensitivity. The **Committee on Decorum and Discipline (CDD)**, Human Resources, Legal, Compliance, or other authorized Company officers, as may be appropriate, shall receive, document, assess, and investigate complaints in accordance with Company policy and applicable law.

Both the complainant and the respondent shall be treated with fairness and respect. The respondent shall be informed of the nature of the complaint and given a reasonable opportunity to explain or be heard. The complainant shall be protected from retaliation and may be given reasonable support or protective measures when warranted by the circumstances.

Confidentiality shall be observed to the extent practicable, subject to the need to investigate the complaint, protect the parties, comply with legal requirements, and implement appropriate action. Employees involved in the complaint, investigation, or resolution process are expected to cooperate truthfully and to refrain from retaliation, intimidation, interference, concealment, or bad-faith accusations.

Any violation of this policy may result in corrective or disciplinary action, up to and including termination, after observance of due process and proper evaluation of the facts, evidence, gravity of the offense, intent, frequency, resulting harm, and surrounding circumstances.

Section 5: Data Privacy & Information Security

Medicare Plus, Inc. is entrusted with personal information, sensitive personal information, health-related data, employee records, client information, provider records, claims data, and confidential business information. As a Health Maintenance Organization, the Company recognizes that protecting such information is essential to preserving trust, complying with law, and upholding our MCARE values of **Mindfulness, Compassion, Accountability, Respect, and Excellence**.

In compliance with the **Data Privacy Act of 2012**, its Implementing Rules and Regulations, and applicable Company policies, all employees are required to observe the following standards:

1. **Use Information Only for Legitimate Business Purposes**

Employees shall access, collect, use, process, disclose, store, transmit, or dispose of personal information and sensitive personal information only when necessary for a legitimate work-related purpose and only within the scope of their authorized duties.

2. Observe the Need-to-Know Principle

Employees shall handle member, patient, employee, provider, client, and Company information strictly on a need-to-know basis. Access to information does not give an employee the right to use, copy, download, disclose, or share such information unless required for an authorized business purpose.

3. Protect Member and Patient Information

Employees shall exercise utmost care in handling medical information, claims records, Letters of Authorization, utilization reports, reimbursement documents, diagnosis-related information, hospital or clinic endorsements, and other health-related data. Such information shall not be discussed, disclosed, forwarded, photographed, uploaded, or shared with unauthorized persons.

4. Maintain Confidentiality of Company and Business Records

Employees shall protect confidential Company information, including contracts, pricing, provider agreements, client accounts, financial records, business plans, internal reports, employee records, system credentials, and proprietary documents.

5. Prohibit Unauthorized Disclosure or Access

Employees shall not disclose, transmit, share, print, copy, screenshot, download, upload, or allow unauthorized access to personal data, sensitive personal information, confidential records, or Company data, whether through email, messaging applications, social media, personal devices, external drives, cloud storage, or any other means.

6. Follow Access Control and Data Handling Procedures

Employees shall comply with all Company rules on data classification, access control, password protection, document retention, storage, transfer, printing, filing, disposal, and secure destruction of records. Employees shall not use another person's account, share passwords, bypass security controls, or access records outside their authorized function.

7. Use Company Systems Responsibly

Employees shall comply with cybersecurity protocols, including restrictions on the use of personal devices, unauthorized software, external storage devices, personal email accounts, unsecured networks, and non-approved applications for Company work or data processing.

8. Report Data Breaches Immediately

Employees must immediately report any known or suspected data breach, unauthorized access, accidental disclosure, loss of documents or devices, misdirected email, compromised account, malware incident, or other information security concern to the **Legal & Compliance Department**, the **Data Protection Officer**, and/or the designated reporting channel.

9. Cooperate in Privacy and Security Reviews

Employees shall cooperate fully and truthfully in any privacy audit, breach assessment, compliance review, investigation, or remedial action conducted by the Company, the Data Protection Officer, Legal, Compliance, IT, HR, or Management.

10. Observe Continuing Confidentiality Obligations

The duty to protect confidential information continues even after transfer, resignation, termination, or separation from employment. Employees shall return all Company records, files, devices, access credentials, and confidential materials upon demand or separation.

Any violation of this policy may result in corrective or disciplinary action, up to and including termination, after observance of due process and proper evaluation of the nature, gravity, intent, frequency, resulting harm, and surrounding circumstances of the offense.

Section 6: Social Media & Digital Conduct

Medicare Plus, Inc. recognizes that social media, messaging applications, email, and other digital platforms are part of everyday communication. While employees are free to maintain personal online accounts and express their personal views, they are expected to exercise professionalism, discretion, respect, and good judgment in all digital communications, especially when such communications may affect the Company, its employees, members, patients, clients, providers, or partners.

Consistent with the Company's MCARE values of **Mindfulness, Compassion, Accountability, Respect, and Excellence**, all employees shall observe the following standards:

1. Confidentiality and Data Privacy

Employees shall not post, upload, transmit, forward, share, or otherwise disclose confidential Company information, patient or member data, claims records, medical information, employee records, client information, provider information, internal documents, business plans, financial information, screenshots, system records, or proprietary business information on any social media or digital platform, unless expressly authorized and legally permitted.

2. Responsible Online Conduct

Employees shall refrain from posting, sharing, commenting on, or circulating content that is false, malicious, defamatory, harassing, discriminatory, threatening, abusive, obscene, or intentionally harmful to Medicare Plus, its leadership, employees, members, patients, clients, providers, suppliers, or business partners.

3. Respectful Digital Communication

Employees shall communicate with colleagues, members, patients, clients, providers, partners, and the public in a respectful and professional manner when using email, chat, messaging applications, video calls, social media, or other digital channels in a work-related context.

4. No Unauthorized Representation of the Company

Employees shall not speak, post, comment, answer inquiries, issue statements, or represent themselves as speaking on behalf of Medicare Plus unless expressly authorized to do so. Personal opinions must not be presented as official Company statements, commitments, endorsements, or positions.

5. Use of Company Name, Logo, and Brand

Employees shall not use the Company's name, logo, trademarks, official materials, photographs, videos, uniforms, IDs, facilities, events, or branding for personal, commercial, political, or unauthorized purposes without prior approval.

6. Work-Related Digital Communications

Digital communications made in work-related contexts, including emails, chats, group messages, online meetings, posts, comments, and other electronic communications, may be covered by this CareBook even when made through personal accounts, personal devices, or outside working hours, if such communication has a direct and substantial connection to the workplace, Company operations, Company reputation, employee relations, member or client trust, or the performance of official duties.

7. Online Harassment, Bullying, or Retaliation

Employees shall not use social media, messaging applications, email, or any digital platform to harass, shame, threaten, intimidate, stalk, bully, discriminate against, or retaliate against any employee, member, patient, client, provider, visitor, or partner.

8. Accuracy and Good Faith

Employees shall exercise care before posting, sharing, or forwarding information that may affect the Company or any person connected with it. Employees shall not knowingly spread false information, misleading statements, fabricated claims, altered screenshots, or malicious content.

9. Proper Use of Company Systems

Company email, devices, internet access, software, communication platforms, and systems shall be used primarily for legitimate business purposes. Employees shall not use Company systems for unauthorized personal business, unlawful activity, harassment, data leakage, or conduct prejudicial to Company operations.

10. Reporting of Digital Misconduct or Data Exposure

Employees who become aware of unauthorized disclosure of Company information, patient or member data, cyberbullying, online harassment, impersonation, fake accounts, data leaks, or other digital misconduct affecting the Company or its stakeholders must promptly report the matter to HR, Legal, Compliance, IT, the Data Protection Officer, or any authorized reporting channel.

This policy shall not be interpreted to unlawfully restrict employees from exercising rights protected by law, including good-faith reports to lawful authorities or legitimate workplace concerns raised through proper channels. However, employees remain accountable for malicious, false, harassing, discriminatory, unauthorized, or unlawful digital conduct.

Any violation of this policy may result in corrective or disciplinary action, up to and including termination, after observance of due process and proper evaluation of the nature, gravity, intent, frequency, resulting harm, and surrounding circumstances of the offense.

LEGAL NOTE: Malicious online posts may constitute Cyber Libel under RA 10175 (Cybercrime Prevention Act), which carries criminal penalties. The company reserves the right to take legal action in addition to internal disciplinary measures.

Section 7: Attendance Standards

Medicare Plus, Inc. depends on the reliable presence, punctuality, and availability of every team member to deliver consistent, high-quality care and service to its members, patients, clients, providers, and partners. Consistent with the Company's MCARE values of **Mindfulness, Compassion, Accountability, Respect, and Excellence**, employees are expected to report for work on time, observe their assigned schedules, properly record their attendance, and comply with established leave and attendance procedures.

The specific rules, thresholds, documentation requirements, approval process, notice periods, grace periods, reporting channels, and corresponding administrative procedures for attendance, leave availment, tardiness, undertime, overtime, official business, work-from-home arrangements, and schedule adjustments shall be governed by the Company's separate and duly issued **Attendance and Timekeeping Policy, Leave Policy**, and other related HR issuances, as may be amended from time to time.

Employees are expected to read, understand, and comply with these external HR policies. Failure to comply with attendance and timekeeping requirements may result in corrective or disciplinary action, subject to applicable labor laws, due process, and the Company's rules on progressive discipline.

Section 8: Workplace Presence & Conduct on Premises

Medicare Plus, Inc. recognizes that employees may need to temporarily step away from their workstations during the workday for legitimate reasons, including coordination with other departments, brief personal needs, health concerns, or other reasonable circumstances. However, employees are expected to remain available, productive, and accountable during their scheduled working hours.

Consistent with the Company's MCARE values of **Mindfulness, Compassion, Accountability, Respect, and Excellence**, employees shall observe the following workplace presence standards:

1. Availability During Working Hours

Employees are expected to be at their assigned workstation or designated work area during working hours, unless they are performing official duties elsewhere, attending meetings, coordinating with other departments, on approved break, or otherwise authorized by their immediate superior.

2. Leaving the Workstation or Premises

Employees who need to leave their workstation, department, or Company premises during working hours must inform or secure approval from their immediate superior, as appropriate under the circumstances and applicable Company policy.

3. **Reasonable Use of Breaks and Non-Work Areas**
Employees may use break areas, comfort rooms, pantry areas, and other common spaces for their intended purposes. However, employees must avoid excessive or repeated time away from their assigned duties when such absence affects productivity, service delivery, team coordination, or operational efficiency.
4. **Professional Use of Working Time**
Employees shall devote working time to official duties and work-related activities. Personal activities extended personal conversations, or unnecessary presence in other departments or work areas should not interfere with assigned tasks or the work of others.
5. **End-of-Shift Conduct**
Employees may reasonably prepare to leave near the end of their shift, provided that doing so does not result in premature cessation of work, disruption of operations, abandonment of pending duties, or failure to properly endorse urgent matters.
6. **Visitors and After-Hours Presence**
Personal visitors during working hours should be limited and must not interfere with work, confidentiality, security, or Company operations. Employees who need to remain on Company premises after working hours must have a legitimate business reason or proper authorization, especially when access to records, systems, restricted areas, or confidential information is involved.
7. **Coordination and Accountability**
Supervisors are expected to manage workplace presence concerns with fairness and good judgment. When issues arise, HR and supervisors should first address them through clarification, coaching, or reminder, unless the circumstances involve serious misconduct, dishonesty, abandonment of duty, security risk, or repeated non-compliance.

Failure to observe these standards may result in corrective or disciplinary action, depending on the nature, frequency, intent, operational impact, and surrounding circumstances, and only after observance of due process.

Section 9: Health, Safety, Sanitation & Personal Appearance

Medicare Plus, Inc. is committed to maintaining a safe, clean, professional, and healthy workplace for employees, members, patients, clients, providers, visitors, and partners. As a healthcare-adjacent organization, we recognize that workplace safety, sanitation, and professional appearance are part of the trust we build with the people we serve.

Consistent with our MCARE values of **Mindfulness, Compassion, Accountability, Respect, and Excellence**, all employees are expected to observe the following standards:

9.1 Health & Safety

The health and safety of everyone within Company premises is a shared responsibility. All employees are required to comply with Company health and safety protocols, as well as applicable rules and advisories issued by the Department of Labor and Employment, Department of Health, local government units, and other relevant government agencies.

Employees shall observe reasonable care for their own safety and the safety of others. They must promptly report unsafe conditions, workplace hazards, accidents, injuries, sanitation concerns, or any situation that may pose a risk to employees, members, patients, visitors, or Company operations.

Employees are also expected to maintain clean, orderly, and sanitary work areas. Littering, improper disposal of waste, or any conduct that contributes to unsanitary or unsafe conditions is prohibited.

Where an employee has, or reasonably believes that they may have, a serious contagious condition that may pose a risk to others in the workplace, the employee must promptly inform HR or the appropriate Company officer and cooperate with reasonable Company health and safety measures. Such information shall be handled with confidentiality, sensitivity, and in accordance with applicable privacy laws.

Employees required to undergo annual physical examinations, medical clearances, fit-to-work assessments, or similar health-related requirements must comply within the schedule and procedure prescribed by HR or Company

policy, subject to reasonable accommodation when warranted. Failure or refusal to comply without valid reason may be treated as a policy violation.

9.2 Personal Appearance & Hygiene

Employees shall help maintain a workplace that is clean, safe, and suitable for healthcare-related operations. Workstations, shared areas, meeting rooms, pantry areas, comfort rooms, storage areas, and common spaces must be used responsibly and kept reasonably clean after use.

Food, personal items, documents, equipment, and waste must be handled and stored properly to prevent clutter, contamination, pests, unpleasant odors, or damage to Company property. Employees handling member files, patient information, claims documents, or provider records must ensure that such materials are secured and not exposed, misplaced, or improperly discarded.

Supervisors, HR, and Administration may issue reasonable reminders, sanitation guidelines, or corrective instructions to maintain workplace order, safety, and cleanliness.

Section 10: Duties, Diligence & Protection of Company Assets

Every employee of Medicare Plus, Inc. is expected to perform their duties with diligence, care, professionalism, and accountability. As a healthcare-adjacent organization, the Company depends on the reliability of its employees not only to protect company resources, but also to ensure timely service to members, patients, clients, providers, and partners.

Consistent with the Company's MCARE values of **Mindfulness, Compassion, Accountability, Respect, and Excellence**, employees shall safeguard all resources entrusted to them, including company property, funds, records, documents, systems, equipment, confidential information, member data, provider records, claims files, and other business assets.

The following acts may constitute neglect of duty, misuse of company assets, or breach of professional responsibility:

- 1. Neglect of Assigned Duties**
Sleeping during working hours, intentionally idling, abandoning assigned work, or engaging in activities unrelated to official duties during working time, when such conduct affects productivity, service delivery, team operations, or member/client service.
- 2. Inaccurate or Improper Timekeeping**
Failing to properly log in or log out using the Company's authorized timekeeping system, using an unauthorized entrance or process to evade proper recording, or otherwise causing inaccurate attendance or time records, whether intentionally or through repeated negligence.
- 3. Careless or Negligent Performance of Work**
Committing negligent, careless, or reckless acts in the performance of duties, including the improper handling of equipment, documents, files, systems, claims records, provider information, member data, or company property, resulting in injury, loss, damage, delay, disruption, or financial prejudice to the Company.
- 4. Failure to Safeguard Company Property and Records**
Negligently keeping, losing, damaging, misplacing, or failing to secure company assets, funds, equipment, records, files, official forms, contracts, member records, claims documents, provider documents, or other materials entrusted to the employee.
- 5. Unauthorized Access, Alteration, or Disposal of Records**
Tampering with, deleting, concealing, altering, copying, transmitting, disposing of, or granting unauthorized access to company records, member information, employee records, claims files, provider records, system data, or confidential materials without proper authority.
- 6. Delay in Critical Processes or Deliverables**
Causing unreasonable delay in the preparation, processing, review, approval, release, endorsement, filing, or submission of critical documents, claims, reimbursements, Letters of Authorization, provider payments,

client reports, utilization reports, government submissions, certifications, or other operational deliverables through negligence, inaction, lack of coordination, or failure to escalate.

7. Misuse of Company Time or Resources

Using company time, property, vehicles, equipment, systems, communication tools, office supplies, funds, or facilities for personal, unauthorized, or non-work-related purposes, or allowing unauthorized persons to use company assets without prior approval.

8. Improper Handling of HMO-Related Records and Processes

Failing to exercise due care in handling member eligibility verification, claims processing, provider coordination, reimbursement documents, utilization reports, client account records, medical-related information, or other HMO-related transactions, especially when such failure may affect access to care, member experience, client trust, provider relations, or regulatory compliance.

9. Unauthorized Solicitation or Personal Business Activities

Soliciting, collecting funds, promoting personal businesses, borrowing from colleagues, or engaging in similar personal activities within company premises, during working hours, or through official company channels, without proper authorization. The selling of goods or products may be allowed, provided that it does not create conflict of interest, disrupt operations, or compromise employee productivity or performance.

10. Failure to Report Loss, Damage, Irregularity, or Misuse

Failing to promptly report the loss, damage, misuse, unauthorized access, suspected fraud, data exposure, irregular transaction, or improper handling of any company asset, record, system, fund, or confidential material.

Supervisors and HR shall address concerns under this section with fairness, proportionality, and proper documentation. Where appropriate, minor or first-time concerns may be addressed through coaching, reminders, or corrective guidance. Serious, repeated, intentional, or harmful acts may result in disciplinary action, up to and including termination, after observance of due process and proper evaluation of the nature, gravity, intent, frequency, resulting damage, and surrounding circumstances of the offense.

Section 11: Disorderly Conduct & Misconduct on Premises

Medicare Plus, Inc. is committed to maintaining a safe, respectful, orderly, and professional workplace. Every employee is expected to conduct themselves in a manner that protects the dignity, safety, and well-being of colleagues, members, patients, clients, providers, visitors, and partners.

Consistent with the Company's MCARE values of **Mindfulness, Compassion, Accountability, Respect, and Excellence**, employees must avoid conduct that disrupts operations, creates unnecessary conflict, compromises workplace safety, or damages the trust placed in the Company.

The following acts are prohibited and may constitute misconduct:

1. Gambling or Unauthorized Games of Chance

Participating in gambling, lotteries, betting, or games of chance within Company premises, during working hours, or through Company systems or communication channels, unless expressly authorized by the Company for a lawful and approved activity.

2. Abusive, Offensive, or Disrespectful Language

Using profane, indecent, insulting, abusive, discriminatory, threatening, or degrading language toward any employee, superior, subordinate, member, patient, client, provider, visitor, or third party, whether done in person, in writing, through digital platforms, or through any other means.

3. Fighting, Provocation, or Physical Confrontation

Fighting, provoking, instigating, or participating in any physical confrontation, disturbance, or violent conduct within Company premises or in any work-related setting, whether before, during, or after working hours.

4. **Threats, Intimidation, or Coercion**
Threatening, intimidating, coercing, harassing, or pressuring any employee, member, patient, client, provider, visitor, or third party through words, actions, messages, calls, emails, social media, or any other means, where such conduct affects workplace safety, well-being, operations, or Company interests.
5. **Attempt to Inflict Injury or Harm**
Attempting to inflict physical injury, bodily harm, or damage upon any person within Company premises or in a work-related setting, except in cases of clear, lawful, and proportionate self-defense.
6. **Disruptive or Disorderly Behavior**
Engaging in horseplay, shouting, creating unnecessary noise, causing disturbance, or acting in a disorderly manner that disrupts work, interferes with service delivery, affects the comfort or safety of others, or compromises the professional environment expected in a healthcare-adjacent workplace.
7. **Alcohol, Intoxication, or Impairment**
Bringing, consuming, possessing, or being under the influence of alcoholic beverages or intoxicating substances within Company premises or during working hours.
8. **Collusion or Participation in Misconduct**
Conniving, conspiring, assisting, enabling, covering up, or participating with others in any act of misconduct, fraud, dishonesty, harassment, breach of confidentiality, misuse of Company property, or violation of Company policy.
9. **Unlawful Acts or Criminal Conduct**
Committing, attempting, or participating in any unlawful act or criminal conduct within Company premises or in connection with Company business, including theft, robbery, physical assault, fraud, falsification, malicious mischief, or other acts punishable under Philippine law.
10. **Misuse of Company-Issued Cards, Accounts, or Instruments**
Using Company-issued ATM cards, payroll cards, identification cards, access cards, accounts, credentials, or other Company-issued instruments for unauthorized purposes, including pledging, lending, selling, transferring, using as loan collateral, or allowing another person to use the same without authority.
11. **Conduct Prejudicial to Workplace Safety or Company Trust**
Any other conduct that materially disrupts Company operations, endangers safety, undermines workplace order, damages Company property, affects member or client trust, or is inconsistent with the professional standards expected of Medicare Plus employees.

HR, supervisors, and management shall address concerns under this section promptly, fairly, and with proper documentation. Where appropriate, minor first-time incidents may be addressed through coaching, reminders, or corrective guidance. Serious, repeated, intentional, violent, dishonest, or harmful conduct may result in disciplinary action, up to and including termination, after observance of due process and proper evaluation of the facts, evidence, nature, gravity, intent, resulting harm, and surrounding circumstances.

Section 12: Prohibited Substances

Medicare Plus, Inc. is committed to maintaining a safe, healthy, and drug-free workplace. Consistent with the **Comprehensive Dangerous Drugs Act of 2002**, applicable labor regulations, and the Company's MCARE values of **Mindfulness, Compassion, Accountability, Respect, and Excellence**, all employees are expected to report for work fit, capable, and free from impairment that may affect safety, judgment, service delivery, or workplace performance.

The following acts are strictly prohibited:

1. **Possession, Use, or Being Under the Influence of Dangerous Drugs**
Possessing, using, consuming, or being under the influence of any dangerous drug, prohibited drug, or controlled substance within Company premises, during working hours, during official business, or in any

work-related venue, except for medicines lawfully prescribed by a licensed physician and used in accordance with such prescription.

2. **Bringing Prohibited Substances into the Workplace**

Bringing, attempting to bring, storing, concealing, or transporting any dangerous drug, prohibited substance, controlled substance, or unauthorized drug-related item into Company premises, Company vehicles, or any work-related venue.

3. **Sale, Distribution, or Inducement**

Selling, distributing, supplying, sharing, offering, facilitating access to, or inducing any person to use dangerous drugs, prohibited substances, or controlled substances, whether within Company premises, during working hours, or in connection with Company activities.

4. **Reporting for Work While Impaired**

Reporting for work or performing duties while impaired by any substance, whether illegal, controlled, misused, or improperly consumed, when such impairment affects the employee's ability to work safely, professionally, and effectively.

5. **Misuse of Prescription or Regulated Medication**

Misusing prescription medication, using another person's medication, or using lawful medication in a manner that creates a safety risk, impairs work performance, or compromises Company operations.

Employees who are taking prescribed medication that may reasonably affect alertness, judgment, mobility, or the safe performance of their duties should inform HR or the Company's designated medical officer, when appropriate, so that reasonable workplace measures may be considered. Such information shall be treated with confidentiality and handled in accordance with applicable privacy laws.

The Company may implement lawful drug-free workplace programs, including education, prevention, referral, and drug testing, in accordance with applicable law, due process, confidentiality requirements, and Company policy. Any test result, report, or related medical information shall be handled with strict confidentiality and used only for legitimate employment, safety, compliance, or legal purposes.

Any violation of this section may result in disciplinary action, up to and including termination, after observance of due process, proper evaluation of the facts, and consideration of the nature, gravity, intent, risk created, and surrounding circumstances. Where required by law, or where the circumstances reasonably warrant, the Company may refer the matter to the appropriate government authority or law enforcement agency.

Section 13: Insubordination & Non-Compliance with Directives

Medicare Plus, Inc. expects all employees to comply with lawful, reasonable, and work-related instructions issued by authorized Company officers. Clear direction, timely compliance, and respect for established authority are necessary to maintain efficient operations, protect member and client service, and uphold the Company's MCARE values of **Mindfulness, Compassion, Accountability, Respect, and Excellence**.

Insubordination refers to the willful refusal to obey a lawful and reasonable order, instruction, directive, or policy issued by a superior or authorized Company officer in connection with work. It may also include conduct that deliberately undermines management authority, disrupts operations, or obstructs the implementation of Company policies, executive directives, compliance requirements, or lawful business decisions.

This policy shall not prevent employees from raising concerns, asking for clarification, requesting reasonable accommodation, or reporting lawful objections through proper channels. However, disagreements, personal objections, or pending requests for reconsideration do not excuse refusal to comply with a lawful and reasonable directive, unless the directive is clearly unlawful, unsafe, or contrary to Company policy.

For purposes of this CareBook, lawful directives may be issued not only by an employee's immediate superior, but also by Management, Human Resources, the Legal and Compliance Department, Data Privacy, Audit, Finance, IT, Administration, or any authorized Company officer acting within the scope of their duties.

The **Legal and Compliance Department** has authority to issue compliance directives, require the observance of Company policies, demand submission of reports or documents, conduct or participate in investigations, issue notices or directives in connection with disciplinary proceedings, and recommend or impose appropriate disciplinary action in accordance with its delegated authority, Company policy, and applicable labor law.

All departments and employees are required to cooperate with lawful directives issued by Legal and Compliance, especially on matters involving policy enforcement, regulatory compliance, data privacy, fraud prevention, investigations, corporate governance, risk management, and protection of Company interests.

The following acts may constitute insubordination or non-compliance with directives:

1. refusing to accept or comply with a lawfully assigned work shift, work location, task, reassignment, reporting line, or operational instruction without valid reason;
2. willfully disregarding, delaying, or refusing to follow a lawful and reasonable instruction from an immediate superior, department head, Management, HR, Legal and Compliance, or other authorized Company officer;
3. refusing to comply with Company policies, executive directives, compliance requirements, internal controls, reporting procedures, or approved operational processes despite notice or instruction;
4. refusing to render authorized overtime work when required by urgent operational needs, subject to applicable labor standards, lawful compensation, and consideration of valid reasons raised by the employee;
5. persistently failing to submit required reports, documents, explanations, accountabilities, or work outputs within the prescribed period despite clear instructions, reminders, and reasonable opportunity to comply;
6. refusing to cooperate in lawful audits, investigations, compliance reviews, HR proceedings, data privacy assessments, or internal inquiries;
7. concealing, withholding, altering, deleting, or refusing to produce records, documents, data, equipment, files, or information required by Management, HR, Legal and Compliance, or another authorized department for a legitimate business or compliance purpose;
8. ignoring or defying corrective instructions, written warnings, compliance notices, return-to-work directives, show-cause notices, preventive measures, or other lawful instructions issued in accordance with Company policy;
9. intimidating, threatening, harassing, coercing, insulting, or retaliating against any superior, manager, HR officer, Legal and Compliance officer, investigator, witness, or Company representative in connection with a work-related matter;
10. encouraging, inducing, or pressuring other employees to disregard lawful Company instructions, policies, executive directives, compliance requirements, or disciplinary processes; and
11. any other deliberate act of defiance, obstruction, refusal, or non-cooperation that affects Company operations, compliance, workplace order, member service, client trust, or the authority of Management.

Insubordination and non-compliance with directives may result in corrective or disciplinary action, up to and including termination, depending on the nature, gravity, intent, frequency, operational impact, resulting damage, and surrounding circumstances.

All disciplinary action under this section shall be implemented in accordance with due process, including proper notice, opportunity to explain or be heard, fair evaluation of the evidence, and compliance with applicable labor laws and Company procedures.

Section 14: Falsification, Misrepresentation & Dishonesty

Honesty and integrity are essential to the trust that Medicare Plus, Inc. maintains with its employees, members, patients, clients, providers, regulators, and partners. Consistent with the Company's MCARE values of **Mindfulness, Compassion, Accountability, Respect, and Excellence**, all employees are expected to be truthful, accurate, and transparent in all work-related dealings, records, submissions, communications, and proceedings.

Falsification, misrepresentation, concealment, or any form of deliberate dishonesty is a serious breach of trust. Such acts may result in corrective or disciplinary action, up to and including termination, depending on the nature, gravity, intent, frequency, resulting damage, and surrounding circumstances. Where warranted, the Company may also refer the matter to the appropriate government agency or law enforcement authority.

The following acts are prohibited:

- 1. False Statements in Employment or Company Records**
Making false, fraudulent, incomplete, or misleading statements in an employment application, personnel record, HR form, clearance document, declaration, certification, or any official Company record, including the concealment of material information required by the Company for legitimate employment, compliance, or operational purposes.
- 2. False or Misleading Statements in Investigations**
Giving false testimony, misleading information, fabricated explanations, or dishonest statements during any Company inquiry, audit, investigation, administrative proceeding, disciplinary process, compliance review, or other official proceeding.
- 3. Submission of False or Fraudulent Documents**
Submitting, using, or causing the submission of false, altered, fabricated, backdated, or misleading documents to obtain employment, leave benefits, reimbursements, incentives, allowances, payroll adjustments, claims, approvals, or any other entitlement or advantage from the Company.
- 4. Falsification or Tampering of Company Records**
Falsifying, altering, tampering with, concealing, destroying, deleting, substituting, or improperly modifying Company records, timekeeping records, attendance logs, payroll documents, financial instruments, official receipts, claims records, Letters of Authorization, provider documents, client records, member files, system entries, reports, or other official documents.
- 5. Dishonest Handling of HMO-Related Transactions**
Misrepresenting, concealing, or manipulating information relating to member eligibility, patient information, claims, reimbursements, provider billings, utilization reports, medical-related documents, client accounts, approvals, denials, endorsements, or other HMO-related transactions.
- 6. False Claims or Misuse of Company Processes**
Making false claims, certifications, representations, or requests in order to secure payments, reimbursements, benefits, approvals, clearances, services, or other Company action to which the employee or another person is not entitled.
- 7. Malicious or Knowingly False Statements**
Making or circulating knowingly false, malicious, defamatory, or deliberately misleading statements about the Company, its employees, officers, members, patients, clients, providers, services, or business partners, whether verbally, in writing, through digital platforms, or through social media.
- 8. Misuse of Digital Content or Online Platforms**
Creating, posting, sharing, forwarding, or circulating false, fabricated, altered, misleading, malicious, or harmful content, including posts, comments, screenshots, memes, images, videos, or messages, where such conduct affects the Company, workplace relations, member or client trust, or the reputation and dignity of any person connected with the Company.

9. **Unauthorized Use of Official Communication Channels**

Posting, removing, altering, replacing, or circulating notices, announcements, memoranda, documents, or materials on Company bulletin boards, email groups, messaging platforms, portals, or other official communication channels without proper authority.

10. **Concealment or Failure to Disclose Material Information**

Knowingly concealing or failing to disclose material facts, errors, irregularities, conflicts of interest, unauthorized transactions, data incidents, operational issues, or compliance concerns that the employee has a duty to report.

This policy shall be applied with fairness and due regard to the facts. Honest mistakes, clerical errors, or inaccuracies made without intent to deceive shall be evaluated based on the surrounding circumstances and may be addressed through correction, coaching, or appropriate administrative action. However, intentional dishonesty, concealment, falsification, fraud, or bad-faith misrepresentation may be treated as a serious offense.

Any disciplinary action under this section shall be imposed only after observance of due process, including proper notice, opportunity to explain or be heard, fair evaluation of evidence, and compliance with applicable labor laws and Company procedures.

Section 15: Theft, Fraud & Financial Misconduct

Medicare Plus, Inc. expects all employees to handle Company funds, property, records, transactions, and business relationships with honesty, integrity, accountability, and care. Acts involving theft, fraud, bribery, misappropriation, or financial dishonesty are serious breaches of trust and are contrary to the Company's MCARE values of **Mindfulness, Compassion, Accountability, Respect, and Excellence**.

Because the Company operates in a healthcare-adjacent industry, financial integrity is essential not only to internal operations, but also to the trust of members, patients, clients, providers, regulators, and business partners. Employees are therefore required to avoid any act that may result in financial loss, improper personal gain, irregular transactions, or damage to the Company's reputation.

The following acts are prohibited:

1. **Bribery, Kickbacks, and Improper Benefits**

Soliciting, accepting, offering, giving, or receiving bribes, kickbacks, commissions, rebates, referral fees, gifts, favors, or any other financial or personal benefit in connection with Company business, official duties, provider transactions, supplier arrangements, client accounts, claims processing, approvals, endorsements, or any matter where the employee's judgment may be influenced or appear to be influenced.

2. **Theft or Attempted Theft**

Stealing, attempting to steal, concealing, removing, or unlawfully taking Company property, funds, equipment, supplies, records, documents, data, or systems access, as well as the personal property of any employee, member, patient, client, provider, visitor, supplier, or third party.

3. **Misappropriation or Non-Remittance of Funds**

Misappropriating, withholding, diverting, delaying, failing to remit, or failing to properly account for Company funds, collections, reimbursements, advances, liquidation amounts, petty cash, payments, deposits, or other financial accountabilities without proper authority, documentation, and approval.

4. **Fraudulent Claims or Requests**

Obtaining, attempting to obtain, processing, endorsing, approving, or facilitating the release of Company funds, materials, benefits, reimbursements, allowances, payments, or services through false representations, fabricated documents, altered records, fictitious transactions, duplicate claims, or other fraudulent means.

5. **Irregular HMO-Related Transactions**

Participating in, facilitating, concealing, or failing to report irregularities involving claims, Letters of Authorization, reimbursements, provider billings, member eligibility, utilization reports, client accounts,

supplier invoices, or other HMO-related transactions that may result in unauthorized benefit, improper payment, financial loss, or prejudice to the Company.

6. **Unauthorized Use or Conversion of Company Property**
Using, lending, pledging, selling, transferring, converting, or disposing of Company property, equipment, supplies, vehicles, documents, funds, digital assets, access credentials, or other resources for personal benefit or for the benefit of another person without proper authority.
7. **Conflict-Creating Financial Dealings**
Borrowing money from, lending money to, guaranteeing loans for, or entering into personal financial arrangements with colleagues, subordinates, members, clients, providers, suppliers, agents, brokers, or business partners in a manner that creates a conflict of interest, compromises professional judgment, causes workplace pressure, or affects Company operations.
8. **Unauthorized Discounts, Waivers, or Financial Commitments**
Granting, promising, approving, or representing unauthorized discounts, waivers, concessions, refunds, credits, payments, accommodations, or financial commitments on behalf of the Company without proper authority.
9. **Failure to Report Loss, Damage, Theft, or Irregularity**
Failing to promptly report any discovered or suspected loss, damage, theft, fraud, unauthorized transaction, financial irregularity, misuse of Company property, or improper handling of Company funds to the immediate superior, HR, Finance, Legal and Compliance, Audit, or other authorized reporting channel.
10. **Concealment, Collusion, or Participation in Financial Misconduct**
Assisting, enabling, concealing, covering up, approving, endorsing, or participating in any act of theft, fraud, bribery, misappropriation, falsification, or financial misconduct, whether for personal benefit or for the benefit of another person.

This section shall be applied with fairness and due regard to the facts. Honest errors, clerical mistakes, or processing lapses made without intent to defraud may be addressed through correction, coaching, process improvement, or appropriate administrative action. However, intentional dishonesty, fraud, theft, misappropriation, concealment, or bad-faith financial conduct may be treated as a serious offense.

Any violation of this section may result in disciplinary action, up to and including termination, after observance of due process, proper evaluation of evidence, and consideration of the nature, gravity, intent, frequency, resulting damage, and surrounding circumstances. Where warranted, the Company may also pursue recovery of losses and refer the matter to the appropriate government agency or law enforcement authority.

Section 16: Unauthorized Activities & Use of Company Resources

Medicare Plus, Inc. provides employees with company time, equipment, facilities, systems, communication tools, vehicles, records, and information to support legitimate business operations and the delivery of quality service to members, patients, clients, providers, and partners.

Consistent with the Company's MCARE values of **Mindfulness, Compassion, Accountability, Respect, and Excellence**, employees are expected to use Company resources responsibly, efficiently, and only for authorized purposes.

The following acts are prohibited:

1. **Unauthorized Personal Use of Company Time or Resources**
Using Company time, equipment, facilities, supplies, systems, internet access, software, communication tools, records, or other resources for personal, commercial, non-work-related, or unauthorized activities, especially when such use interferes with official duties, operations, confidentiality, or service delivery.

2. **Improper Use of Company Systems and Devices**

Using Company computers, phones, email, messaging platforms, databases, applications, or digital tools for unauthorized purposes, including personal business, unlawful activity, excessive personal communication, unauthorized downloads, non-approved applications, or activities that may expose the Company to security, privacy, or operational risks.

3. **Unauthorized Meetings or Activities on Company Premises**

Holding, organizing, or participating in unauthorized meetings, gatherings, solicitations, sales activities, or similar activities within Company premises or during working hours when such activities disrupt operations, interfere with work, affect confidentiality, or are inconsistent with Company policy.

4. **Improper Use of Company-Issued Phones and Communication Tools**

Using Company-issued phones, mobile devices, email accounts, messaging platforms, or other communication tools for excessive personal use, unauthorized transactions, personal business, or communications that interfere with work duties or expose the Company to liability.

5. **Unauthorized Use of Company Vehicles, Equipment, or Physical Assets**

Using Company vehicles, equipment, office facilities, access cards, identification cards, supplies, forms, documents, or other physical assets without proper authority, outside approved purposes, or in a manner inconsistent with Company policy.

6. **Allowing Unauthorized Persons to Use Company Resources**

Permitting, lending, sharing, or allowing unauthorized persons, including relatives, friends, former employees, vendors, or third parties, to use Company property, vehicles, equipment, systems, accounts, access credentials, communication channels, or facilities without prior written approval.

7. **Removal or Transfer of Company Property Without Authority**

Removing, transferring, bringing home, lending, selling, pledging, disposing of, or relocating Company property, documents, equipment, supplies, devices, files, or records without proper approval, documentation, and accountability.

8. **Use of Company Resources for Personal Gain**

Using Company property, systems, funds, data, member or client information, provider relationships, business opportunities, or official position for personal advantage or for the benefit of another person or entity without authority.

9. **Failure to Return or Account for Company Property**

Failing to return, account for, surrender, or properly liquidate Company-issued property, funds, devices, equipment, files, records, access cards, IDs, or other accountabilities upon request, reassignment, suspension, clearance, resignation, termination, or separation.

Reasonable and incidental personal use of certain Company resources may be allowed when expressly permitted by Company policy or authorized practice, provided that such use is limited, lawful, does not interfere with work, does not involve confidential information, and does not expose the Company to cost, risk, or liability.

Violations of this section may result in corrective or disciplinary action, depending on the nature, gravity, frequency, intent, resulting damage, operational impact, and surrounding circumstances, and only after observance of due process.

Section 17: Encouraging Violations & Obstruction

Medicare Plus, Inc. expects every employee to support a workplace culture of accountability, cooperation, and respect for lawful Company rules. Consistent with the Company's MCARE values of **Mindfulness, Compassion, Accountability, Respect, and Excellence**, employees must not encourage misconduct, interfere with Company processes, or obstruct the proper implementation of policies, investigations, controls, or operational requirements. The following acts are prohibited:

1. **Encouraging or Inducing Violations**
Encouraging, coercing, bribing, pressuring, assisting, or inducing any employee to violate Company rules, policies, lawful directives, compliance requirements, confidentiality obligations, attendance standards, or other established procedures.
2. **Concealing or Enabling Misconduct**
Knowingly assisting, concealing, covering up, or enabling another employee's misconduct, policy violation, fraud, dishonesty, data breach, misuse of Company resources, or other act prejudicial to the Company, its employees, members, clients, providers, or partners.
3. **Obstruction of Company Processes**
Interfering with, delaying, obstructing, or refusing to cooperate in lawful Company processes, including HR proceedings, compliance reviews, audits, investigations, disciplinary procedures, data privacy assessments, document reviews, or operational checks.
4. **Deliberate Work Slowdown or Withholding of Effort**
Deliberately slowing down work, withholding effort, limiting output, refusing coordination, or intentionally disrupting workflow in a manner that harms team performance, member service, client commitments, provider coordination, regulatory obligations, or Company operations.
5. **Failure to Report Loss or Irregularity**
Failing to promptly report a known or suspected loss, damage, theft, misuse, unauthorized access, or irregularity involving Company property, funds, records, systems, or assets for which the employee has responsibility or knowledge, without valid and documented reason.
6. **Persistent Delay in Required Submissions**
Repeatedly or unjustifiably delaying, withholding, or failing to submit required reports, documents, liquidations, explanations, accountabilities, client deliverables, utilization reports, compliance requirements, or other work outputs, especially when such delay affects operations, service delivery, regulatory compliance, financial reporting, or Company obligations.
7. **Tampering With or Withholding Information**
Concealing, altering, destroying, deleting, withholding, or refusing to produce records, documents, files, data, communications, equipment, or other materials required for legitimate business, HR, compliance, audit, legal, or operational purposes.
8. **Retaliation or Pressure Against Reporting Employees**
Threatening, intimidating, harassing, pressuring, or retaliating against any employee who reports a concern, participates in an investigation, provides information, or refuses to take part in misconduct.

Employees who encourage, enable, conceal, or obstruct violations may be held accountable independently of the underlying offense. Where appropriate, such conduct may be treated with the same or greater seriousness as the violation being encouraged, concealed, or obstructed, depending on the employee's role, intent, participation, resulting harm, and surrounding circumstances.

Any disciplinary action under this section shall be imposed only after observance of due process, including proper notice, opportunity to explain or be heard, fair evaluation of the evidence, and consideration of the nature, gravity, frequency, intent, operational impact, resulting damage, and surrounding circumstances.

Section 18: Breach of Loyalty, Confidentiality & Company Integrity

Medicare Plus, Inc. entrusts its employees with information, relationships, systems access, facilities, and responsibilities that require loyalty, discretion, and sound judgment. As a healthcare-adjacent organization, the Company depends on every employee to protect confidential information, maintain organizational trust, comply with internal controls, and act in a manner consistent with the Company's MCARE values of **Mindfulness, Compassion, Accountability, Respect, and Excellence**.

The following acts are prohibited and may constitute serious misconduct or breach of trust:

- 1. Unauthorized Disclosure of Confidential Information**
Disclosing, sharing, transmitting, discussing, posting, copying, or allowing access to confidential, restricted, or proprietary Company information to any unauthorized person, whether inside or outside the Company. This includes member or patient information, claims data, medical-related information, provider records, client accounts, employee records, financial data, contracts, trade secrets, strategic plans, business methods, pricing, internal reports, system credentials, and other confidential materials.
- 2. Careless Handling of Confidential Information**
Negligently or carelessly handling confidential records, files, documents, devices, emails, messages, or system access in a manner that may result in unauthorized disclosure, loss, leakage, exposure, misuse, or compromise of Company, member, patient, client, provider, or employee information.
- 3. Acts Prejudicial to Company Trust and Loyalty**
Knowingly making, spreading, or circulating false, malicious, or harmful statements, rumors, accusations, or content intended to damage the reputation of the Company, its officers, management, employees, members, clients, providers, or partners, or to undermine workplace trust, morale, cooperation, or organizational stability.
- 4. Conduct That Undermines Company Operations or Interests**
Acting in a manner that deliberately prejudices Company operations, client commitments, provider relations, member service, regulatory compliance, internal controls, or the Company's legitimate business interests.
- 5. Non-Compliance with Audit, Financial, or Internal Controls**
Failing or refusing to comply with lawful audit requirements, financial controls, documentation standards, approval procedures, liquidation requirements, reporting obligations, or internal control measures in the performance of official duties.
- 6. Unauthorized Possession of Weapons or Dangerous Items**
Possessing, carrying, storing, displaying, or bringing firearms, explosives, deadly weapons, or dangerous items within Company premises, Company vehicles, or work-related venues without lawful authority and prior Company authorization, and in violation of applicable law or Company security protocols.
- 7. Vandalism or Damage to Property**
Deliberately destroying, damaging, defacing, tampering with, or misusing Company property, facilities, equipment, documents, systems, records, vehicles, or the property of any employee, member, patient, client, provider, visitor, or third party.
- 8. Unauthorized Distribution of Materials**
Distributing, posting, circulating, or transmitting unauthorized, offensive, unlawful, disruptive, defamatory, discriminatory, obscene, or harmful materials within Company premises, during working hours, or through Company communication channels, systems, or platforms.
- 9. Misuse of Company Identification or Access Credentials**
Lending, transferring, sharing, allowing another person to use, falsifying, altering, duplicating, or creating any Company identification card, access card, account, credential, badge, pass, or similar instrument without proper authority.
- 10. Unauthorized Access or Misuse of Company Systems**
Accessing, attempting to access, or allowing another person to access Company systems, files, records, premises, restricted areas, or confidential information without authority or legitimate business purpose.
- 11. Failure to Report Integrity or Security Concerns**
Failing to promptly report known or suspected breaches of confidentiality, unauthorized access, data leakage, security violations, falsified identification, vandalism, control breaches, or other acts affecting Company integrity and safety.

This section shall not prevent employees from raising good-faith concerns, reporting violations through proper channels, participating in lawful proceedings, or exercising rights protected by law. However, employees remain accountable for malicious, dishonest, unauthorized, harmful, or bad-faith conduct.

Any violation of this section may result in corrective or disciplinary action, up to and including termination, after observance of due process and proper evaluation of the nature, gravity, intent, frequency, resulting harm, and surrounding circumstances.

PART III | CODE OF DISCIPLINE

Chapter 1: Governing Principles

The disciplinary framework of Medicare Plus is grounded in the following principles, which reflect both Philippine labor law requirements and global best-practice governance standards:

Proportionality	Penalties are commensurate with the gravity of the offense and the circumstances surrounding it.
Due Process	No employee shall be penalized without the right to be heard — every case follows the Twin Notice Rule mandated by law.
Rehabilitation	The primary goal of discipline is behavioral correction, not punishment. Progressive discipline exists to guide improvement.
Consistency	Standards are applied uniformly across all levels of the organization — no employee is above accountability.
Confidentiality	All disciplinary proceedings are conducted with strict confidentiality. Information is shared only on a need-to-know basis.

Chapter 2: Corrective Actions & Progressive Discipline

Medicare Plus operates a progressive discipline system designed to correct behavior while ensuring proportional consequences. The scale of corrective actions is as follows:

Written Warning	The primary formal corrective action. Issued at first instance of a violation, detailing the specific act and expected improvement. Documented in the employee's 201 file and subject to the 12-month cleansing period for light offenses.
Suspension	For persistent or more serious violations. The employee is placed on unpaid leave for 1 to 30 days depending on gravity and offense category. Served as a serious signal of unacceptable conduct. Not applicable to Grave offenses, which proceed directly to termination.
Termination	The final measure, reserved for cases of grave misconduct (theft, violence, fraud, drug use, sexual harassment, abandonment) or a continued and documented failure to improve after progressive corrective actions. Always subject to full due process.

PROGRESSIVE DISCIPLINE RULE: If an employee accumulates three (3) instances of any combination of Written Warnings across different offenses, the penalty for the subsequent (third)

infraction shall automatically escalate to a two (2)-day Suspension without pay, unless a higher specific penalty is expressly prescribed in the Summary Table (Appendix A).

CLEANSING PERIOD: Records of Written Warnings (Light Offenses) are disregarded for progressive discipline purposes if no further infractions occur for twelve (12) consecutive months. This cleansing mechanism does not apply to offenses resulting in Suspension or those classified as Serious or Grave.

Chapter 3: Specific Offenses & Penalties

The following matrix provides general guidance on the classification of offenses and the corresponding corrective or disciplinary action that may be imposed by Medicare Plus, Inc. The Company shall observe due process in all disciplinary proceedings, including the issuance of notice, opportunity to explain or be heard, and a fair evaluation of the facts and evidence.

The penalties stated below are guidelines. The Company may impose a higher or lower penalty depending on the nature of the act, intent, frequency, position of the employee, degree of damage, operational impact, risk to members or patients, breach of trust involved, and other surrounding circumstances.

Category A: Serious Misconduct & Willful Disobedience

Serious misconduct refers to a willful violation of a definite and established Company rule, lawful directive, or standard of conduct. Willful disobedience refers to the intentional refusal to comply with a lawful, reasonable, and work-related instruction issued by a superior or authorized Company officer.

Code	Offense	Corrective / Disciplinary Action
A1	Unauthorized solicitation, collection, selling, or similar activity within Company premises or during working hours, including improper solicitation or acceptance of bribes, favors, or benefits connected with Company business	1st offense: Suspension of up to 6 working days without pay; 2nd offense: Termination
A2	Scandalous or disorderly conduct, including horseplay, gambling, use of profane language, indecent gestures, or similar acts affecting workplace order	1st offense: Suspension of up to 6 working days without pay; 2nd offense: Suspension of up to 12 working days without pay; 3rd offense: Termination
A3	Insubordination without gross disrespect, including willful refusal to follow a lawful and reasonable work-related instruction	1st offense: Suspension of up to 3 working days without pay; 2nd offense: Termination
A4	Insubordination with gross disrespect, including open contempt, insulting language, abusive behavior, or threatening conduct toward management, HR, Legal and Compliance, or other authorized officers	1st offense: Termination
A5	Unjustified refusal to render authorized overtime when required by service exigency, or rendering overtime without prior approval	1st offense: Written Warning; 2nd offense: Suspension of up to 6 working days without pay; 3rd offense: Suspension of up to 12 working days without pay; 4th offense: Termination
A6	Violation of health and safety protocols, including refusal to observe required safeguards	1st offense: Written Warning; 2nd offense: Suspension of up to 6 working days without pay; 3rd offense: Termination
A7	Reporting to work under the influence of alcohol or drinking alcoholic beverages on	1st offense: Termination

	Company premises or during working hours, except during Company-authorized events where alcohol is expressly permitted	
A8	Bringing alcoholic beverages to Company premises without authority, or consuming alcohol in an unauthorized manner during Company-related activities	1st offense: Written Warning; 2nd offense: Suspension of up to 6 working days without pay; 3rd offense: Termination
A9	Failure to follow established protocols, workflows, SOPs, or operational procedures	1st offense: Written Warning; 2nd offense: Suspension of up to 6 working days without pay; 3rd offense: Suspension of up to 12 working days without pay; 4th offense: Termination. If the violation causes financial liability or serious operational prejudice: 1st offense: Suspension of up to 6 working days without pay; 2nd offense: Termination
A10	Willful disregard of lawful directives relating to cleanliness, sanitation, or workplace order	1st offense: Written Warning; 2nd offense: Suspension of up to 6 working days without pay; 3rd offense: Suspension of up to 12 working days without pay; 4th offense: Termination
A11	Unauthorized posting, alteration, or removal of materials from Company bulletin boards, official communication channels, portals, or similar platforms	1st offense: Written Reprimand; 2nd offense: Suspension of up to 6 working days without pay; 3rd offense: Termination

Category B: Gross & Habitual Neglect of Duties

Neglect of duty refers to the failure to perform assigned duties with the care, diligence, and attention reasonably expected of an employee. Gross or habitual neglect may constitute just cause for termination under applicable labor laws.

Code	Offense	Corrective / Disciplinary Action
B1	Habitual absenteeism, or unexcused absences exceeding four times within a calendar month	1st offense: Written Warning; 2nd offense: Suspension of up to 3 working days without pay; 3rd offense: Termination
B2	Absence Without Official Leave or AWOL, meaning failure to report for work without prior approval, valid justification, or proper notice	1 day AWOL: 1st offense: Written Warning; 2nd offense: Suspension of up to 6 working days without pay; 3rd offense: Termination. 2 days AWOL: 1st offense: Suspension of up to 6 working days without pay; 2nd offense: Termination. 3 or more consecutive days: Termination, subject to due process and evaluation of abandonment or intent not to return
B3	Habitual tardiness, or more than four late arrivals within a calendar month, subject to the applicable grace period under the Attendance and Timekeeping Policy	1st offense: Written Warning; 2nd offense: Suspension of up to 3 working days without pay; 3rd offense: Termination
B4	Unapproved undertime or leaving work before the end of the scheduled shift without approval or valid justification	1st offense: Written Warning; 2nd offense: Suspension of up to 6 working days without pay; 3rd offense: Termination
B5	Violation of official work schedule, including failure to be at the designated workstation or to perform duties during official working hours	1st offense: Written Warning; 2nd offense: Suspension of up to 6 working days without pay; 3rd offense: Suspension of up to 12 working days without pay; 4th offense: Termination
B6	Non-compliance with Company memoranda, circulars, executive directives, or official HR, Legal, Compliance, or Management issuances	1st offense: Written Warning; 2nd offense: Suspension of up to 6 working days without pay; 3rd offense: Suspension of up to 12 working days without pay; 4th offense: Termination

B7	Simple neglect of duty, including sleeping during working hours, failure to submit reports, unreasonable delay, or unexcused inaction	1st offense: Written Warning; 2nd offense: Suspension of up to 6 working days without pay; 3rd offense: Suspension of up to 12 working days without pay; 4th offense: Termination
B8	Gross or habitual neglect causing operational disruption, service delay, financial prejudice, or repeated disregard of duties	1st offense: Suspension of up to 6 working days without pay; 2nd offense: Termination. If the act causes substantial loss, serious damage, or significant operational disruption: Termination
B9	Damage to Company property through intentional, reckless, or negligent acts	1st offense: Suspension of up to 6 working days without pay; 2nd offense: Termination. Restitution may be required, subject to applicable labor standards
B10	Data security breach, whether intentional or due to gross negligence, including unauthorized disclosure of personal, sensitive personal, health-related, or proprietary information	Depending on severity: Suspension, Termination, and/or referral to the National Privacy Commission or appropriate authority, subject to due process
B11	Financial irregularities, including unauthorized expenses, failure to observe accounting or audit controls, or improper handling of funds	1st offense: Suspension of up to 6 working days without pay; 2nd offense: Termination
B12	Loitering, wasting time, loafing, or receiving unauthorized personal visitors during working hours in a manner that disrupts work or operations	1st offense: Written Warning; 2nd offense: Suspension of up to 6 working days without pay; 3rd offense: Termination

Category C: Fraud & Willful Breach of Trust

The following offenses involve dishonesty, fraud, abuse of confidence, or willful breach of the trust reposed by the Company in the employee. These acts are serious in nature and may warrant termination on the first offense, subject to due process.

Code	Offense	Corrective / Disciplinary Action
C1	Theft or qualified theft, including taking Company property or the property of employees, members, clients, providers, visitors, or third parties without consent and with intent to gain	1st offense: Termination; possible criminal referral
C2	Misappropriation, malversation, estafa, or non-remittance of money, property, funds, or goods received in trust	1st offense: Termination; possible criminal referral
C3	Falsification of documents, data, records, signatures, receipts, reports, claims, time logs, or system entries	1st offense: Termination; possible criminal referral
C4	Misrepresentation, false testimony, or knowingly false statements during hiring, employment, investigation, audit, compliance review, or disciplinary proceedings	1st offense: Termination
C5	Breach of confidentiality, including unauthorized disclosure of confidential information, trade secrets, member data, patient information, claims records, provider records, or proprietary Company information	1st offense: Termination; possible referral to the National Privacy Commission if personal data is involved
C6	Unauthorized reproduction, copying, distribution, or use of copyrighted materials, intellectual property, official forms, proprietary materials, or Company-owned content	1st offense: Termination; possible legal referral
C7	Dishonesty, deception, fabrication, concealment, or misrepresentation to the Company, superiors, colleagues, members, clients, providers, or business partners	1st offense: Termination

Code	Offense	Corrective / Disciplinary Action
C8	Disloyalty or conflict of interest, including engaging in a competitive business, prioritizing personal gain over Company interests, or failing to disclose a material conflict	1st offense: Termination
C9	Breach of trust by a managerial, supervisory, fiduciary, or trust-position employee	1st offense: Termination

HEIGHTENED STANDARD FOR MANAGERS & SUPERVISORS: Managerial and supervisory employees occupy positions of trust and confidence. Any breach of trust — including the offenses above and acts of disloyalty, gross inefficiency, or abuse of authority — constitutes Loss of Confidence under the Labor Code and warrants termination. The standard of accountability for these roles is proportionally higher.

Category D: Offenses Against Persons & Other Grave Violations

Code	Offense	Corrective / Disciplinary Action
D1	Physical assault, infliction of bodily harm, or violent conduct against any employee, member, patient, client, provider, visitor, or third party	1st offense: Termination; possible criminal referral
D2	Sexual harassment, gender-based sexual harassment, indecent acts, acts of lasciviousness, or conduct creating a hostile, offensive, or unsafe environment	1st offense: Termination; referral to appropriate authorities where required or warranted
D3	Libel, slander, cyber libel, malicious imputation, or defamatory statements affecting the Company, its officers, employees, members, clients, providers, or partners	1st offense: Termination; possible legal or criminal referral
D4	Possession, use, sale, distribution, administration, or facilitation of dangerous drugs or prohibited substances	1st offense: Termination; referral to appropriate authorities where required or warranted
D5	Abandonment of work, consisting of failure to report for work without valid justification and overt acts showing intent not to return	1st offense: Termination, subject to notice, opportunity to respond, and evaluation of surrounding circumstances
D6	Gross inefficiency or repeated failure to meet reasonable work standards causing serious prejudice to operations	Termination may be imposed after performance management, coaching, or a performance improvement process where practicable, subject to due process

Category E: Professional Attire & Grooming

Code	Offense	Corrective / Disciplinary Action
E1	General grooming or dress code violation, including failure to report in smart casual, professional, or prescribed business attire	1st offense: Written Warning; 2nd offense: Suspension of up to 3 working days without pay; 3rd offense: Suspension of up to 6 working days without pay; 4th offense: Termination
E2	Non-compliance with a specific mandatory attire, uniform, identification, or appearance directive issued by memorandum or Company policy	1st offense: Written Warning; 2nd offense: Suspension of up to 3 working days without pay; 3rd offense: Suspension of up to 6 working days without pay; 4th offense: Termination

Inclusivity Note: Employees may wear clothing that aligns with their gender identity and expression, provided it falls within the prescribed categories of attire. This policy is administered in alignment with RA 11313 (Safe Spaces Act).

Chapter 4: Your Right to Be Heard — Due Process

Medicare Plus is committed to fairness. No employee shall face disciplinary action without the full exercise of their right to due process as guaranteed by the Labor Code of the Philippines and aligned with the Supreme Court's Twin Notice Rule doctrine.

4.1 The Twin Notice Rule

FIRST NOTICE: Notice to Explain (NTE)	SECOND NOTICE: Notice of Decision (NOD)
A written notice specifying the exact grounds for disciplinary action, with a minimum of five (5) calendar days given to the employee to submit a written explanation. Failure to respond within the period is not an admission of guilt but may result in a decision based on available evidence.	A written notice informing the employee of management's final decision, the specific penalty imposed, and the factual and legal basis for the decision. Issued within 24 hours of the President/CEO's approval.

4.2 Administrative Due Process Flow

The following steps constitute the mandatory due process flow for all disciplinary cases:

- Step 1 **Incident Reporting:** An Incident Report (IR) may be initiated and submitted by the Immediate Supervisor, Department Head, Human Resources Department (HRD), or any employee who personally witnessed or has direct knowledge of the incident. The IR shall be submitted within three (3) working days from the date of discovery or occurrence of the incident, where practicable.
- Step 2 **Preparation of Notice to Explain (NTE):** The Human Resources Department (HRD) shall prepare the Notice to Explain (NTE). In cases involving minor infractions, including but not limited to attendance-related violations, the Immediate Supervisor or Department Head may prepare the NTE, subject to review and approval by HRD prior to endorsement for legal review.
- Step 3 **Legal Review and Clearance:** All disciplinary matters, including the corresponding NTE and supporting documents, shall be submitted to the Legal Department for review and clearance prior to issuance to the employee concerned.
- Step 4 **Issuance of Notice to Explain (NTE):** The Notice to Explain (NTE) shall be issued exclusively by the Human Resources Department (HRD). The concerned employee shall be afforded five (5) calendar days from receipt thereof within which to submit a written explanation or answer.
- Step 5 **Committee Deliberation:** Upon receipt of the employee's written explanation, or upon lapse of the period provided for submission thereof, the Committee on Decorum and Discipline (CDD) shall evaluate the records, review the evidence presented, and deliberate on the matter.
- Step 6 **When Necessary – Administrative Hearing:** The Committee on Decorum and Discipline (CDD) may conduct a formal administrative hearing whenever deemed necessary for the clarification of facts, reception of additional evidence, or observance of due process requirements.
- Step 7 **When Necessary – Approval by the Chief People Officer (CPO):** Cases requiring management approval or involving serious disciplinary sanctions shall be elevated to the Chief People Officer (CPO) for final review and approval.
- Step 8 **Issuance of Notice of Decision (NOD):** The final decision shall be formally issued to the concerned employee by the Human Resources Department (HRD).

4.3 Committee on Decorum and Discipline (CDD)

The CDD is the impartial fact-finding and recommending body for serious or complex disciplinary cases requiring a formal Administrative Hearing. Its composition ensures multi-stakeholder representation and objectivity.

Role	Member
Chairperson	HR Director
Member	Legal & Compliance Representative
Member	Finance Department Representative
Member	Company Executive (Board Appointee)
Member	Department Representative (Head/Supervisor of the Respondent)

QUORUM: A minimum of three (3) members, including the Chairperson, is required to constitute a valid quorum for hearings and deliberations. The findings of the CDD are submitted to the President/CEO for final review and approval. The decision of the President/CEO is final and executory.

4.4 Preventive Suspension

The Company may place an employee under Preventive Suspension — without pay — if their continued presence at work poses a serious and imminent threat to the life, safety, or property of the employer, co-workers, patients, or clients. Preventive suspension shall not exceed thirty (30) calendar days. Should the period be extended, the company must pay the employee's wages and benefits for the duration of the extension. Preventive suspension is a precautionary measure, not a penalty, and does not prejudice the outcome of the disciplinary investigation.

Chapter 5: Roles in Implementation & Governance

Effective implementation of this CareBook is a shared responsibility across the organization. The following roles have defined accountabilities:

5.1 Human Resources Department

The Human Resources Department is responsible for the day-to-day administration of employee lifecycle management, employee documentation, policy implementation, and administrative due process. In performing these functions, HR shall act under the supervision and control of the Executive Committee and shall primarily defer to the judgment, directives, and policy determinations of the Executive Committee on matters affecting Company operations, discipline, organizational structure, and employee relations.

HR shall ensure that Company policies are implemented fairly, consistently, efficiently, and in accordance with applicable labor laws, while preserving the Company's MCARE values of **Mindfulness, Compassion, Accountability, Respect, and Excellence**.

The responsibilities of HR include the following:

- 1. Onboarding and Documentation**
Preparing, processing, and maintaining employment contracts, regularization documents, confidentiality undertakings, non-disclosure agreements, employee acknowledgments, and the signed **Acknowledgment and Pledge** for this CareBook.
- 2. Employee Lifecycle Administration**
Managing employee records and documentation relating to hiring, onboarding, deployment, regularization, movement, promotion, reassignment, leave administration, performance documentation, clearance, resignation, and separation.

3. **Policy Implementation and Employee Guidance**
Communicating Company policies, memoranda, directives, and HR procedures to employees; providing guidance on policy interpretation; and ensuring that employees are properly informed of their duties, rights, and responsibilities.
4. **Employee Discipline and Due Process**
Administering disciplinary proceedings in coordination with Management, Legal and Compliance, and the appropriate supervising officers. This includes assigning HR case coordinators, preparing and serving notices, tracking responses, scheduling hearings or conferences when necessary, and ensuring compliance with the twin-notice requirement and other applicable standards of administrative due process.
5. **Coordination with the Executive Committee**
Referring serious, sensitive, complex, or high-impact employee matters to the Executive Committee for direction. HR shall give primary deference to the Executive Committee's judgment on matters involving business necessity, operational impact, trust and confidence, management prerogative, and final disciplinary action, subject to applicable law and due process.
6. **Preventive Suspension and Interim Measures**
Processing preventive suspension, temporary reassignment, access restriction, or other interim measures when warranted by the circumstances and when consistent with law and Company policy, especially where the employee's continued presence may pose a serious and imminent threat to Company property, operations, records, witnesses, employees, members, or stakeholders.
7. **Committee and Investigation Support**
Providing administrative and procedural support to the Committee on Decorum and Discipline, Legal and Compliance, Management, or any authorized investigating body. The HR Director or designated HR representative may chair or coordinate proceedings, convene meetings, document hearings, and submit recommendations for review and approval by the proper authority.
8. **Record-Keeping and Case Management**
Maintaining complete and accurate 201 files and employee records, including employment documents, policy acknowledgments, training certifications, disciplinary records, notices, explanations, investigation records, decisions, and related documentation.
9. **Monitoring and Efficiency**
Maintaining an organized tracking system for HR cases, attendance concerns, policy acknowledgments, training compliance, disciplinary history, and pending employee matters to ensure timely action, proper escalation, and efficient resolution.

HR shall perform its functions with fairness, confidentiality, professionalism, and sensitivity. However, HR's administrative role shall not limit the authority of the Executive Committee, Management, Legal and Compliance, or other duly authorized Company officers to issue lawful directives, enforce Company policy, recommend disciplinary action, or make final management decisions in accordance with Company procedures and applicable labor laws.

5.2 Legal & Compliance Department

The Legal and Compliance Department is the Company's central authority for legal risk management, regulatory compliance, policy review, and enforcement of compliance standards. It has the inherent authority to interpret Company policies, issue compliance directives, require the submission of documents and explanations, review disciplinary actions, and ensure that all Company issuances, processes, and employee actions are aligned with applicable law, regulatory requirements, and this CareBook.

In the exercise of its functions, the Legal and Compliance Department may review, intervene in, assume, or direct the handling of matters involving serious policy violations, substantial legal risk, regulatory exposure, breach of labor standards, fraud, data privacy, harassment, workplace safety, serious misconduct, or acts that may expose the Company, its officers, or employees to civil, criminal, administrative, or regulatory liability.

The responsibilities of the Legal and Compliance Department include the following:

- 1. Policy Review and Alignment**

Acting as the central reviewing body for Company policies, memoranda, circulars, directives, forms, notices, and other official issuances to ensure consistency with this CareBook, applicable laws, regulatory standards, and Company values. All departmental memoranda, disciplinary templates, and policy issuances must be furnished to Legal and Compliance for review or notation, as appropriate.
- 2. Regulatory and Legal Compliance**

Ensuring that Company policies, operations, employee practices, and internal controls comply with applicable Philippine laws, labor standards, data privacy regulations, HMO-related regulatory requirements, corporate governance rules, and directives of relevant government agencies.
- 3. Compliance Directives and Enforcement Authority**

Issuing lawful compliance directives to any department, officer, or employee when necessary to protect the Company's legal interests, ensure observance of Company policy, preserve records, prevent regulatory exposure, address misconduct, or correct non-compliant practices. Employees and departments are required to cooperate with and comply with such directives.
- 4. Review of Disciplinary Proceedings**

Reviewing disciplinary cases, notices, investigation records, employee explanations, hearing summaries, recommendations, and notices of decision to ensure legal soundness, substantial evidence, proportionality of penalty, and observance of administrative due process.
- 5. Case Coordination and Legal Guidance**

Assigning Legal and Compliance representatives to assist in disciplinary proceedings, investigations, audits, data privacy reviews, fraud inquiries, workplace complaints, or other sensitive matters. Legal and Compliance may provide guidance at any stage of the due process flow, including case assessment, drafting of notices, evaluation of evidence, hearings, recommendations, and final action.
- 6. Primary Jurisdiction Over Serious Legal, Compliance, and Labor Standards Matters**

Upon review, the Legal and Compliance Department may assume primary jurisdiction over cases involving serious breaches of labor standards, serious misconduct, fraud, harassment, retaliation, data privacy breaches, workplace safety risks, regulatory exposure, criminal implications, or matters involving significant legal or reputational risk to the Company. In such cases, HR, department heads, and concerned officers shall defer to the procedural guidance, legal assessment, and compliance directives of the Legal and Compliance Department, subject to final management approval where required.
- 7. Authority to Require Records and Cooperation**

Requiring employees, supervisors, departments, and officers to submit relevant documents, reports, records, explanations, emails, system logs, attendance records, audit materials, transaction records, or other information necessary for legal review, investigation, compliance assessment, or disciplinary proceedings.
- 8. Protection of Company Interests**

Recommending appropriate legal, administrative, corrective, disciplinary, regulatory, or recovery action when Company interests are affected. This may include recommending preventive measures, preservation of evidence, access restrictions, recovery of losses, regulatory reporting, or referral to appropriate government agencies when warranted.
- 9. Annual Review and Policy Updating**

Participating in the annual review of this CareBook, preferably every November or at such other period determined by Management, to ensure continuing legal compliance, operational relevance, regulatory alignment, and consistency with the Company's MCARE values.

The Legal and Compliance Department shall exercise its authority with fairness, objectivity, confidentiality, and due regard to employee rights. Its involvement shall not dispense with the requirements of due process. Rather, its role is to ensure that Company action is legally sound, properly documented, evidence-based, proportionate, and compliant with applicable law and Company policy.

5.3 Managers & Supervisors

- Model MCARE values in every leadership action and decision.
- Promptly identify, document, and report employee conduct issues to HR through the Incident Report and NTE process within 24 hours of discovery.
- Conduct regular coaching conversations with their teams — not only for performance improvement, but for recognition and reinforcement of positive behaviors.
- Participate in CDD hearings and proceedings when called upon as the Department Representative.
- Refrain from imposing disciplinary measures unilaterally — all formal corrective actions must be processed through HR.

5.4 All Employees

- Read, understand, and commit to upholding this CareBook in full.
- Demonstrate MCARE behaviors consistently in all work-related interactions.
- Report known or suspected violations in good faith through established channels — supervisors, HR, or the designated Ethics & Compliance contact.
- Actively participate in required training, onboarding briefings, and annual CareBook refresher sessions.
- Cooperate fully and honestly in any investigation or proceeding conducted under this CareBook.

Section 1: Communication & Launch

The effectiveness of this CareBook depends on every employee understanding it — not just receiving it. The following communication actions are required upon issuance and with each annual revision:

- All-hands kickoff briefing facilitated by HR leadership, with a Q&A session. A recorded version must be made available for employees unable to attend.
- Department-level briefings facilitated by direct supervisors within 5 days of the all-hands briefing, using the MCARE Behavior discussion guide.
- Digital distribution via official company email and intranet, with a read-receipt or acknowledgment mechanism.
- Physical copies posted in break rooms, nursing stations, and common areas for easy reference.
- Multilingual accessibility: Key provisions translated into Filipino to ensure comprehension across the workforce.

Section 2: Training & Onboarding Integration

- New Employee Onboarding: CareBook orientation is a mandatory component of all new hire onboarding within the first week of employment. Includes MCARE value immersion, Acknowledgement & Pledge signing, and a walkthrough of key policies.
- Annual Refresher Training: All employees complete a refresher session every calendar year, ideally following the November annual review. Completion is tracked by HR and recorded in the 201 file.
- Role-Specific Training: Managers and supervisors receive additional training on conducting coaching conversations, filing Incident Reports, and managing the due process workflow.
- Behavioral Scenarios: Training incorporates real-world scenarios that make MCARE behaviors tangible and situationally relevant — using the teach-back method for retention.

Section 3: Positive Reinforcement & Culture Activation

Best-in-class organizations understand that disciplinary frameworks alone do not build culture — recognition does. Medicare Plus will operationalize MCARE values through the following positive reinforcement mechanisms:

- MCARE Recognition Program: A structured peer and manager nomination system to recognize employees who exemplify MCARE values in exceptional ways. Recognition is shared at team meetings, via internal communications, and at the annual employee event.
- Values in Performance Reviews: MCARE behavioral alignment is formally embedded in the annual and probationary performance review process, contributing meaningfully to overall performance ratings.
- MCARE Moments: A regular (weekly or bi-weekly) internal communication segment — email, intranet post, or team huddle — spotlighting observed examples of MCARE in action.
- Leadership Modeling: Senior leaders and managers are expected to visibly and regularly demonstrate MCARE behaviors and reference the values in their communications and decisions.

Section 4: Monitoring, Reporting & Annual Review

- HR Dashboard: HR maintains a confidential tracking dashboard for disciplinary cases, progressive discipline records, and cleansing periods. Aggregate (de-identified) trend data is reported to senior leadership quarterly.
- Pulse Checks: Bi-annual culture surveys include questions tied to MCARE value perception, psychological safety, and awareness of the CareBook and reporting channels.

- Annual CareBook Review: The CDD convenes every November to review and, if necessary, revise the CareBook. Reviews consider: changes in Philippine law or DOLE regulations, case precedents, survey feedback, and evolving organizational needs.
- Ethics Hotline / Speak-Up Channel: A designated and confidential reporting channel (email, form, or third-party hotline) allows employees to report concerns anonymously. All reports are acknowledged and investigated. Retaliation against reporters is strictly prohibited (see Part II, Section 2).

PART V | FINAL PROVISIONS

Cleansing Period

Records of Written Warnings (Light Offenses) are disregarded for progressive discipline purposes if no further infractions occur for twelve (12) consecutive months from the date of the last warning. This provision does not apply to offenses resulting in Suspension or those classified as Serious or Grave, which remain permanently on record.

Repealing Clause

This Conduct & Compliance CareBook supersedes, repeals, and revokes all prior codes of discipline, memoranda, or company policies inconsistent with its provisions. Any previous policy not explicitly included herein but contrary to the spirit of this CareBook is hereby deemed ineffective.

Separability Clause

If any provision of this CareBook is held invalid by a court or competent authority, the remaining provisions not affected shall remain in full force and effect.

Effectivity

This CareBook shall take effect immediately upon its circulation to all employees. The CDD shall conduct its first mandatory review in November following the issuance date.

Approved by the Management of Medicare Plus, Inc.



Gerard Sean H. Rodriguez
Chief People Officer

APPENDIX A | SUMMARY OF INFRACTIONS & PENALTIES

Offense	1st Offense	2nd Offense	3rd Offense	4th Offense
CATEGORY A — SERIOUS MISCONDUCT & WILLFUL DISOBEDIENCE				
Unauthorized Solicitation / Accepting Bribes / Offering Bribes	Suspension of up to 6 working days w/o pay	Termination		
Scandalous Conduct	Suspension of up to 6 working days w/o pay	Suspension of up to 12 working days w/o pay	Termination	
Insubordination (No Gross Disrespect)	Suspension of up to 3 working days w/o pay	Termination		
Insubordination (With Gross Disrespect)	Termination			
Refusal to Render Overtime	Written Warning	Suspension of up to 6 working days w/o pay	Suspension of up to 12 working days w/o pay	Termination
Violation of Health & Safety Protocols	Written Warning	Suspension of up to 6 working days w/o pay	Termination	
Alcohol Prohibition	Termination			
Drinking or taking alcoholic beverages	Written Warning	Suspension of up to 6 working days w/o pay	Termination	
Failure to Follow Protocols/Workflows	Written Warning	Suspension of up to 6 working days w/o pay	Suspension of up to 12 working days w/o pay	Termination
→ If causing financial liability	Suspension of up to 6 working days w/o pay	Termination		
Willful disregard of directives relating to cleanliness in the office	Written Warning	Suspension of up to 6 working days w/o pay	Suspension of up to 12 working days w/o pay	Termination
Unauthorized posting or removal of materials from bulletin board	Written Warning	Suspension of up to 6 working days w/o pay	Termination	
CATEGORY B — GROSS & HABITUAL NEGLIGENCE OF DUTIES				
Habitual Absenteeism (>4 unexcused/month)	Written Warning	Suspension of up to 3 working days w/o pay	Termination	
AWOL — 1 Day	Written Warning	Suspension of up to 6 working days w/o pay	Termination	

AWOL — 2 Consecutive Days	Suspension of up to 6 working days w/o pay	Termination		
AWOL — 3+ Consecutive Days (Abandonment)	Termination			
Habitual Tardiness (>4 lates/month)	Written Warning	Suspension of up to 3 working days w/o pay	Termination	
Unapproved undertime	Written Warning	Suspension of up to 6 working days w/o pay	Termination	
Violation of Official Work Schedule	Written Warning	Suspension of up to 6 working days w/o pay	Suspension of up to 12 working days w/o pay	Termination
Non-Compliance with Memoranda	Written Warning	Suspension of up to 6 working days w/o pay	Suspension of up to 12 working days w/o pay	Termination
Simple Neglect of Duty	Written Warning	Suspension of up to 6 working days w/o pay	Suspension of up to 12 working days w/o pay	Termination
Gross Neglect / Operational Disruption	Suspension of up to 6 working days w/o pay	Termination		
Gross Negligence — Substantial Loss/Damage	Termination			
Damage to Property	Suspension of up to 6 working days w/o pay	Termination		
Data Security Breach	Termination			
Financial Irregularities / Audit Non-Compliance	Suspension of up to 6 working days w/o pay	Termination		
Loitering	Written Warning	Suspension of up to 6 working days w/o pay	Termination	
CATEGORY C — FRAUD & WILLFUL BREACH OF TRUST (ALL: Termination)				
Theft / Qualified Theft	Termination			
Malversation / Estafa	Termination			
Falsification of Documents/Data	Termination			
Misrepresentation / False Testimony	Termination			
Breach of Confidentiality	Termination			
Unauthorized Reproduction (Copyright)	Termination			
Dishonesty	Termination			

Disloyalty / Conflict of Interest	Termination			
Breach of Trust (Managerial/Supervisory)	Termination			
CATEGORY D — OFFENSES AGAINST PERSONS & OTHER GRAVE VIOLATIONS				
Physical Assault	Termination			
Sexual Harassment / Indecent Acts	Termination			
Libel, Slander & Cyber Libel	Termination			
Dangerous Drugs (Possession/Use/Sale)	Termination			
Abandonment	Termination			
Gross Inefficiency	Termination			
CATEGORY E — PROFESSIONAL ATTIRE & GROOMING				
General Grooming Violation	Written Warning	Suspension of 3 working days w/o pay	Suspension of 6 working days w/o pay	Termination
Mandatory Attire Violation (Per Memo)	Written Warning	Suspension of 3 working days w/o pay	Suspension of 6 working days w/o pay	Termination

LEGEND: Light Yellow = Suspension (without pay). Light Red = Termination. Green rows = Category headers. All disciplinary actions require due process (Twin Notice Rule). Refer to Chapter 3 for full offense descriptions and Chapter 4 for the due process flow.

LEGAL NOTE: ⚠️ **MANAGEMENT DISCRETION:** The penalty schedule above represents the minimum standard. The Company expressly reserves the right to impose immediate termination on the first offense, at its sole discretion, where the breach is determined to be severe in scope, intentional in nature, or harmful to patients, employees, or the organization. This discretion is exercised by the CDD and remains subject to full due process under this CareBook.

APPENDIX B | CONSULTING ASSESSMENT: GAPS, UPGRADES & RECOMMENDATIONS

Critical Evaluation & Key Improvements Made

The following summarizes the critical gaps identified in the original CareBook and the upgrades applied in this Version 2.0, assessed across seven dimensions:

Dimension	Gap Identified (v1.0)	Upgrade Applied (v2.0)
Structure & Readability	Code of Conduct (values) and Code of Discipline (penalties) lacked clear integration — the document felt punitive rather than values-driven.	Unified into a five-part architecture. Values and behaviors precede discipline. Visual design reinforces identity. Plain language throughout.
MCARE Integration	MCARE behaviors were a separate standalone document with no formal link to disciplinary consequences. The values were aspirational, not enforceable.	MCARE values and mandatory behaviors are now formally embedded in Part I with direct references throughout the discipline framework. Behavioral violations are tied to the values they breach.
Employee Engagement	No positive reinforcement mechanisms. No recognition program. No feedback loops. Culture-building was absent.	Added Part IV with MCARE Recognition Program, values-in-performance-reviews integration, MCARE Moments, and bi-annual culture pulse surveys.
Legal Compliance (PH)	Non-retaliation policy was absent. Social media/digital conduct was unaddressed. No DPA/RA 10173 data privacy provisions. RA 11313 (Safe Spaces Act) not cited. No Data Protection Officer (DPO) reference.	All identified gaps addressed: Non-Retaliation Policy (Part II, Sec. 2), Social Media Conduct (Part II, Sec. 6), Data Privacy (Part II, Sec. 5), Anti-Harassment (Part II, Sec. 4) with statutory citations. DPO reference added.
Behavioral Psychology	No behavioral design principles. No incentives for compliance. No framing of 'why these matters.' Rules presented as restrictions only.	Applied commitment device (Pledge), identity-based framing ('we are people who...'), social proof via MCARE Moments, loss aversion via clear consequence escalation, and the teach-back training method for retention.
Conflict of Interest	Brief mention under disloyalty without a standalone policy. No disclosure mechanism.	Full standalone Conflict of Interest policy (Part II, Sec. 3) with mandatory disclosure process and clear distinction between disclosure and violation.
Implementation Mechanisms	No training framework. No communication plan. No culture activation mechanisms. No monitoring or reporting system.	Full implementation framework added (Part IV): communication plan, onboarding integration, annual refresher training, recognition program, ethics hotline, and HR dashboard.

ACKNOWLEDGEMENT AND PLEDGE

Medicare Plus, Inc. — Conduct & Compliance CareBook

I, _____, of the _____ Department, hereby acknowledge that I have received, read, and understood the Conduct & Compliance CareBook of Medicare Plus, Inc., Version 2.0.

I commit to uphold the MCARE values — Mindfulness, Compassion, Accountability, Respect, and Excellence — in all my actions, decisions, and interactions as an employee of Medicare Plus.

I understand that my employment carries the responsibility to conduct myself with professionalism, integrity, and respect for this organization and my colleagues. I fully understand that any violation of the standards set forth herein may result in disciplinary action, up to and including termination, subject to the due process requirements of this CareBook and the Labor Code of the Philippines.

I accept this CareBook not merely as a compliance requirement, but as a personal commitment to excellence, accountability, and the well-being of every person I serve.

Employee Signature over Printed Name

Date

Position / Designation

Department

Witnessed by:

HR Representative — Signature over Printed Name

Date

HR NOTE: This signed Acknowledgement & Pledge must be collected on or before the employee's first day in active duty, filed in the employee's 201 file, and recorded in the HR tracking system. A copy must be provided to the employee upon request.

APPENDIX D | MCARE QUICK REFERENCE CARD

Detach and keep this card as a daily reminder of what it means to be part of the Medicare Plus team.

M MINDFULNESS <i>Present. Honest. Self-aware. Protect privacy. Stay safe.</i>	C COMPASSION <i>Listen. Empathize. Anticipate. Comfort. Communicate.</i>	A ACCOUNTABILITY <i>Own it. Commit. Know the rules. Clean up. Ask for help.</i>	R RESPECT <i>Honor diversity. Use proper etiquette. Wear your ID. Speak constructively.</i>	E EXCELLENCE <i>Improve always. Follow escalations. Apply 5S. Complete training. Teach others.</i>
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Every Customer. Every Person. Every Interaction.



*Every Customer.
Every Person.
Every Interaction.*