

ALCOHOL-FREE WORKPLACE POLICY

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	President		

Policy No.	001
Version No.	001
Revision No.	001

Policy No.: HRCO-2023- 002					.10	
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Alcohol-free Workplace Policy				Date Prepared: , 2024		
				Effectivity Date: In	nmediately upon	approval
Prepared by:		Reviewed by:	ı		Approved by:	
Ms. Irish Ponce HR Compliance Associate	Ms. Joey N. Lead of Culture	Ms. Diana Beleno Bus. Process Manager	Atty. Christian Pangilinan Legal Department	Atty. Kristine Delos Reyes Head, Legal and Compliance	Ms. Janice Chief Human Resources Officer	Mr. Andy Tsui President

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Revision 001	 The violations/offenses related to the unjustified possession and consumption of alcoholic beverages within the company premises, as well as reporting to work intoxicated, are considered as Gross or Habitual Misconduct (Grade C).
	 The violations/offenses of unjustified possession of alcoholic beverages within the company premises and consumption of alcoholic beverages within the company premises are combined, as they have the same penalty/sanction under the Company's Code of Conduct.

I. Purpose

This Policy aims to foster a safe, healthy, and productive work environment for all employees and guests of DigiPlus Interactive Corp., its subsidiaries, and its affiliate companies (collectively, the "Company") by establishing clear guidelines regarding the presence and consumption of alcoholic beverages on company premises.

II. Coverage

This Policy applies to all employees of the Company, regardless of rank, status, and tenure, as well as guests, visitors, and other individuals present on company premises.

III. Policy

- A. <u>Bringing Alcoholic Beverages in Company Premises</u>
- 1. General Rule Alcoholic beverages are prohibited on Company premises regardless if it's during or outside office hours. (i.e. work stations, office cubicle/rooms, employee lounge, reception area, comfort rooms, bingo boutiques/areas, company car, etc.).
- 2. Exceptions Alcoholic beverages may be permitted on Company premises under the following circumstances:
 - a. Gifts for special occasions (e.g. birthdays, Christmas, etc.),
 - b. Received as gifts,
 - c. Used or will be used as a marketing collateral or similar business purpose, or
 - d. Other similar circumstances as may be determined by the Human Resources

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			Manager	Department	Compliance	Officer	

Department (HRD).

B. Consuming Alcoholic Beverages on Company Premises

- 1. General Rule Consumption of alcoholic beverages is prohibited on Company premises.
- 2. Exception(s) Consumption may be permitted under the following circumstances:
 - a. Company-sanctioned events (e.g. Birthday, Anniversary, etc.),
 - b. Entertaining VIP guests or cliennts,
 - c. Specific circumstances following board meetings,
 - d. Other circumstances deemed appropriate by the HRD.

C. <u>Denial of Entry / Removal from company premises</u>

- 1. Any person found in possession of, or consuming alcoholic beverages within company premises without authorization may be denied or asked to leave, unless allowed/sanctioned by the management, through HRD, as stated in the "Exception(s)" under Section III, A and B of this Policy.
- 2. Any person exhibiting signs of intoxication during office hours may be denied entry to or asked to leave the company premises. A person is considered intoxicated when, due to the consumption of alcoholic beverages, his/her mental faculties are impaired thereby losing control over his/her behavior and/or actions.

IV. Awareness

- The HRD shall post copies of this Policy in conspicuous places and published through Lark system. Posts shall not be defaced, removed, or tampered by any employee. Any employee who shall, without authority, have said posting defaced, removed, or tampered, in part or in whole, shall be subjected to disciplinary/corrective action.
- 2. The respective line leaders shall immediately cascade this Policy to their subordinates via e-mail or other platforms (i.e. Teams, Viber, etc.). Any line leader who fails to cascade or implement shall be subjected to disciplinary/corrective action.

V. Procedure/Guidelines

Inspecting of Bags/Belongings

- 1. Security Guard on duty may inspect bags upon entry to Company premises.
- 2. Immediate Heads or HRD may conduct inspections with the employee's consent at any time.

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Testing Conductors

Testing may be conducted by any of the following:

- 1. The HRD personnel on its own initiative or upon recommendation of security on duty, immediate manager, or any officer of the company.
- 2. Admin. Dept. personnel upon recommendation of security on duty, immediate manager, or any officer of the company.

Spot Testing of Employees and Guests/Visitors

- 1. Spot testing shall be conducted if a person shows visible signs of intoxication (i.e. Reeks of Alcohol, Slurred Speech, Delayed Reaction Time, Decreased Inhibitions, etc.).
- 2. Person(s) to be tested shall be brought to a secluded area (i.e. employee lounge).
- 3. The subject person(s) shall be informed why Spot Testing will be conducted and that such testing is considered as an official investigation.
- 4. The subject person(s) shall be asked standard questions on whether they had a drink.
- 5. The subject person(s) may likewise be subjected to Field Sobriety Tests (i.e. Horizontal Gaze Nystagamus, Walk & Turn Test, and One-Leg Stand Test).
- 6. The subject person(s) shall be subjected to by breathalyzer.
- 7. If the breathalyzer indicates that a person's BAC is more than 0.02%, the person shall be denied entry or be asked to leave the company premises. Otherwise, the person shall be allowed entry or remain within company premises.
- 8. An employee who is denied entry shall be tagged as absent or went on unauthorized undertime if asked to leave the company premises.

VII. Funding, Sourcing, and Purchasing

The Company shall provide the necessary funding for the sourcing and procurement of at least two (2) units of breathalyzer.

The Admin. Dept. shall be responsible for the sourcing and procurement of the breathalyzers.

The HRD and the Admin. Department shall each keep one unit of breathalyzer.

VIII. Corrective Action and Penalty

Any employee found to have violated this Policy shall be subjected to the following corrective action(s):

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Associate	Cultu	ure	Bus. Process Manager	Legal Department	Head, Legal and Compliance	Resources Officer	

Violation	Written Warning	Suspension	Termination
Defacing, Removing, or		1 st Offense	2 nd Offense
Tampering of posted			
Policy			
Failure to Cascade or	1 st Offense	2 nd Offense	3 rd Offense
Implement			
Unauthorized / Unjustified		1 st Offense	2 nd Offense
possession / Unsanctioned			
Consumption of alcoholic			
beverages within the			
company premises (on-			
duty or off-duty) or			
outside the company			
premises while being on-			
duty, on official business,			
or during company			
event(s) without any			
authorization.			
Reporting to work or		1 st Offense	2 nd Offense
staying within company			
premises intoxicated			

It is understood that the imposition of the above-mentioned penalties shall, before imposition, undergo the due process requirement under the law. Such an imposition, however, is without prejudice to any court action or remedy that is available to the company taking into consideration the reputational risks involved in every case.

IX. Repealing Clause

All existing policies inconsistent with this Policy are hereby repealed, modified, or amended accordingly.

X. Effectivity

This Policy shall take effect immediately after publication.