

GUIDELINES

DISCIPLINARY PROCEEDINGS, GRIEVANCE, HARASSMENT POLICY, DISCRIMINATION POLICY, AND WHISTLEBLOWING POLICY

Approved

[Signature]
HR Manager

Checked

[Signature]
L. Castaño
HR Supervisor

Prepared

[Signature]
J. Hermosa
HRGA Staff

<p>I. OBJECTIVE</p>	<ul style="list-style-type: none"> ➤ To provide guidelines and promote awareness among employees on proper conduct and behavior which the company expects of them. ➤ To enhance discipline, efficiency and harmonious relationship among employees. ➤ To instill in the minds of erring employees that giving sanctions is not merely punitive but corrective. ➤ To encourage good performance, correcting problems through advice and counseling, while building commitment for high standard work practices ➤ To effect an orderly flow of communication in dealing with disciplinary matters while maintaining the morale of subject employees ➤ To provide procedural steps and substantive rules in the resolution of disciplinary cases of employees. ➤ To address issues concerning the implementation of company policies and decisions of the Discipline Committee. ➤ To set forth the expectations of conduct and mutual respect in regard to sexual harassment and the process of complaint if these expectations are not met or violated. ➤ To establish clearly that this Sohbi Kohgei (Phils.), Inc. is committed to providing a work environment that is free from discrimination and harassment in any form. 																																										
<p>II. SCOPE</p>	<p>The policy guidelines shall be complied with and abided by all employees without discrimination and regardless of position. In the course of the disciplinary action proceedings, the Discipline Committee shall exercise its discretion and judgment wisely and fairly in imposing penalties and disciplinary actions. However, it is the duty and responsibility of the immediate superior to counsel the erring employee under their supervision. All employees therefore are required to maintain an acceptable and satisfactory level of conduct and personal behavior.</p> <p>These guidelines shall apply to all officials and employees of SKPI, regardless of position and status.</p>																																										
<p>III. DEFINITION</p>	<table border="0"> <tr><td>DC</td><td>-</td><td>Discipline Committee</td></tr> <tr><td>DAR</td><td>-</td><td>Disciplinary Action Record</td></tr> <tr><td>CCVDAF</td><td>-</td><td>Code of Conduct Violation and Disciplinary Action Form</td></tr> <tr><td>MOM</td><td>-</td><td>Minutes of Meeting</td></tr> <tr><td>EH</td><td>-</td><td>Employee Handbook</td></tr> <tr><td>WBRF</td><td>-</td><td>Whistle Blower Report Form</td></tr> <tr><td>CD</td><td>-</td><td>Committee on Decorum</td></tr> <tr><td>PFC</td><td>-</td><td>Prima Facie Case</td></tr> <tr><td>PI</td><td>-</td><td>Preliminary Investigation</td></tr> <tr><td>PIR</td><td>-</td><td>Preliminary Investigation Report</td></tr> <tr><td>PPS</td><td>-</td><td>Petition for Preventive Suspension</td></tr> <tr><td>PPS</td><td>-</td><td>Formal Investigation</td></tr> <tr><td>FIR</td><td>-</td><td>Formal Investigation Report</td></tr> <tr><td>HRGA</td><td>-</td><td>Human Resources and General Affairs</td></tr> </table>	DC	-	Discipline Committee	DAR	-	Disciplinary Action Record	CCVDAF	-	Code of Conduct Violation and Disciplinary Action Form	MOM	-	Minutes of Meeting	EH	-	Employee Handbook	WBRF	-	Whistle Blower Report Form	CD	-	Committee on Decorum	PFC	-	Prima Facie Case	PI	-	Preliminary Investigation	PIR	-	Preliminary Investigation Report	PPS	-	Petition for Preventive Suspension	PPS	-	Formal Investigation	FIR	-	Formal Investigation Report	HRGA	-	Human Resources and General Affairs
DC	-	Discipline Committee																																									
DAR	-	Disciplinary Action Record																																									
CCVDAF	-	Code of Conduct Violation and Disciplinary Action Form																																									
MOM	-	Minutes of Meeting																																									
EH	-	Employee Handbook																																									
WBRF	-	Whistle Blower Report Form																																									
CD	-	Committee on Decorum																																									
PFC	-	Prima Facie Case																																									
PI	-	Preliminary Investigation																																									
PIR	-	Preliminary Investigation Report																																									
PPS	-	Petition for Preventive Suspension																																									
PPS	-	Formal Investigation																																									
FIR	-	Formal Investigation Report																																									
HRGA	-	Human Resources and General Affairs																																									

IV. DISCIPLINARY ACTION PROCEEDINGS

IV-A. DISCIPLINARY COMMITTEE

The committee shall be composed of seventeen (17) members (see below table for committee composition). Members shall serve for a term of three (3) years from the date of appointment. The ten (10) members from the rank-and-file shall have a fixed term of three (3) years without reappointment or reelection in the following year, meaning resting period of elected member is one year. Management representatives may be reappointed at the discretion of top management.

COMMITTEE COMPOSITION	
Seven (7) Management Staff	Selected by the top management
Ten (10) Rank and File Staff	Selected by SKPI employees
Committee Chairman	Selected by all members of the committee
	Presiding officer and sets the agenda for monthly meeting
Secretariat	HRGA representative; serves as facilitator and convener of meetings.



SOHBI KOHGEI (Phils.), Inc.
Lima Technology Center, Lipa City, Batangas

Document No. ☞ GU.H01.03.03
Revision Date ☞ 22 March 2023
Effective Date ☞ 29 March 2023
Page Number ☞ 1 of 18

GUIDELINES

DISCIPLINARY PROCEEDINGS, GRIEVANCE, HARASSMENT POLICY, DISCRIMINATION POLICY, AND WHISTLEBLOWING POLICY

(continuation)

Each department/section (Die Engineering, Manufacturing Engineering, Production Engineering, QA/QC, Production, Sales & Marketing, HRGA, ITS, Finance and Accounting, Smart) must have one (1) representative each in the committee. Each department is responsible for appointing or electing its representative without any interference from the management. Only regular employees with at least two (2) years in service and with no active penalty may be appointed or elected to the committee. In any case of a member has DC violation, he/she shall be removed/replaced from the committee. Selection may be done by mere appointment of the majority of the department's rank-and-file employees or by secret balloting. The Secretariat shall ensure the free selection of representatives from the rank-and-file.

Committee Chairman – the Chairman shall approve meeting agenda; preside over all committee meetings and set the mood for a friendly atmosphere while ensuring an orderly and fair proceedings; and review judgments before they are served.

Members – shall attend and actively participate in committee meetings; and exercise freely the right to make independent investigations without prejudice to the exercise of their official functions, duties and responsibilities as employees. Any member who will not be able to attend a meeting must inform either the Secretariat or the Chairman through any means of communication. Any member who accumulates three (3) absences will be replaced.

Secretariat – shall ensure that rank-and-file representatives are chosen or elected by employees themselves in the manner provided in the Guidelines in Disciplinary Action Proceedings; ensure that all employee complaints based on Code of Conduct Violation and Disciplinary Action Form are promptly acted upon; convene the Discipline Committee whenever necessary; prepare all necessary documents, including agenda for the day, minutes of the previous meeting and draft of judgments based on the proceedings; and serve notices to concerned employees. The Secretariat shall have no voting privileges.

IV-B. SCHEDULE OF MEETINGS

A regular meeting shall be held every first Monday of each month at 1300H. If it falls on a non-working day, it is then held on the working day immediately after.

Quorum shall mean ½ plus one of the total memberships of the Committee.

A special meeting may be conducted in place of a regular meeting in any of the ff cases: lack of quorum on the scheduled regular meeting or when there is an emergency meeting with the customer where both the Chairman and Vice-Chairman are attendees. Likewise, a special meeting may be conducted when the offense is punishable by dismissal or the offender is about to exit from the company (EOC or resigned).

IV-C. GENERAL RULE

The Management shall exercise its rights in enforcing disciplinary proceedings to help the erring employee recognize that a problem exists, and the committee should develop an effective solution to it. Any act that is prejudicial to the welfare of the employee or inimical to the interest of the company shall be punished.

The list of offenses and penalty levels of the *Guidelines on Disciplinary Policy* is not exclusive as there can be no exhaustive enumeration of the types and kinds of offenses. The Discipline Committee may, in the exercise of fair and equitable judgment, depend on the similarity to any of the defined offenses.

The Discipline Committee reserves the right to impose additional sanctions if it is necessary to preserve the company property or interest and the life of the employee. At any instance, the Committee will uphold its right to assess and collect from the erring employee a reasonable amount of compensation arising from whatever damages caused by the deliberate or intentional commission of an act.

Penalty for violations and the appropriate disciplinary action shall be imposed on the erring employee.

IV-D. PROGRESSIVE DISCIPLINE STEP

RESPONSIBLE	FLOW DIAGRAM	DETAILS	REFERENCE
Petitioner, HRGA DC Chairman	<pre> graph TD A([Petition for wrongdoing]) --> B((A)) </pre>	<p>1. Petitioner (concerned employee at any level of the organization) shall file Code of Conduct Violation and Disciplinary Action Form (CCVDAF) detailing pertinent information such as the name of the offender, department, and section and statement or nature of offenses. A report attachment will be more informative to describe facts of the violation, including the Notice to Explain (NTE) and the Explanation letter from the offender. All necessary documents shall be filed to the</p>	CCVDAF, EH



SOHBI KOHGEI (Phils.), Inc.
Lima Technology Center, Lipa City, Batangas

Document No. ☞ GU.H01.03.03
Revision Date ☞ 22 March 2023
Effective Date ☞ 29 March 2023
Page Number ☞ 2 of 18

GUIDELINES

DISCIPLINARY PROCEEDINGS, GRIEVANCE, HARASSMENT POLICY, DISCRIMINATION POLICY, AND WHISTLEBLOWING POLICY

(continuation)

RESPONSIBLE	FLOW DIAGRAM	DETAILS	REFERENCE
(continuation)		<p>HRGA office within thirty (30) working days after the commission or omission of an act that necessitates disciplinary proceeding, otherwise, the Discipline Committee reserves the right to hear or not to hear the case.</p> <p>HRGA conducts preliminary investigation on the case through interviews and review of documents presented. If results of preliminary investigation show a sufficient case against the erring employee, HRGA informs Department Manager concerned, complainant and Discipline Committee Chairman. The Chairman shall review the Guidelines on Disciplinary Policy to classify offenses carried out. Such offenses must be known to the employee concerned through a written notice and must be served prior to investigation.</p> <p>All complaints when properly filed must be acted upon according to their merits. A complaint cannot anymore be withdrawn once filed, even if the offended party (if against person) has already forgiven the offender.</p>	
Petitioner, HRGA, DC		<p>2. Prior to serving the disciplinary action, a formal investigation and questioning are carried out by the Committee Chairman such that offender shall be interviewed together with the petitioner (preferably the Department Head and Manager). Date, time and proceedings of the cross-examination shall be noted.</p> <p>Investigation must demonstrate a trend of facts and justification of the violation such that erring employee will understand the rules he violated and the appropriate disciplinary action. While the company reserves the right to investigate, the employee concerned also reserves the right to defend himself.</p>	CCVDAF, Documented Records
DC		<p>3. At the regular Committee meeting, the Chairman shall present facts of collected violation forms. The Committee will then scrutinize offenses. For disciplinary action to be appropriate, the Committee shall ensure its justification and proper examination. As such, the Committee may perform a review of employee's (offender) track record and past disciplinary actions carried out which is analogous to the offense.</p>	CCVDAF, EH
		<p>4. Based on a justified result, the Committee's judgment is submitted to the HRGA. The disciplinary action is then entered on the employee's Disciplinary Action Record, duly signed by the HRGA-in-charge, Discipline Committee chairman, concerned Manager and Vice-President. The concerned superior (Head/ Supervisor/ Manager) shall notify the employee thru the Disciplinary Action Record Form and shall conduct a Disciplinary Interview to reduce/eliminate occurrences of violations. The Disciplinary Action Record Form shall then be returned to the HRGA for filing and monitoring. Finally, the immediate superior of the concerned employee</p>	



SOHBI KOHGEI (Phils.), Inc.
Lima Technology Center, Lipa City, Batangas

Document No. ⇨ GU.H01.03.03
Revision Date ⇨ 22 March 2023
Effective Date ⇨ 29 March 2023
Page Number ⇨ 3 of 18

GUIDELINES

DISCIPLINARY PROCEEDINGS, GRIEVANCE, HARASSMENT POLICY, DISCRIMINATION POLICY, AND WHISTLEBLOWING POLICY

(continuation)

RESPONSIBLE	FLOW DIAGRAM	DETAILS	REFERENCE
DC, HRGA, Head/Supervisor /Manager	<pre> graph TD A[4 Serving of Penalty to violation] --> B([Appeal]) </pre>	shall serve the penalty to the erring employee thru the Disciplinary Action Record Form.	DAR
Employee		5. The concerned employee may, within five (5) working days upon notification of the decision, submit a petition for reconsideration to the Grievance Committee. Upon receipt of the petition for reconsideration, the Grievance Committee shall convene within five (5) working days to review the case. A decision or disposition on the case/issue presented must be announced before adjournment.	Petition for reconsideration

IV-E. CLEANSING PROCESS

An employee who is able to improve his performance and solve the problem or does not commit the same or similar violation again is more likely to maintain good work. A cleansing period of one (1) year is given to the employee by which similar offense is deactivated. This means that subsequent violation after this period shall automatically be considered as a first offense.

However, an employee who undergoes the cleansing process twice is no longer entitled to a next cleansing process. After the duration of the second cleansing process, the employee must not commit any violation of company policies which he has already committed before. Otherwise, he is considered a recidivist. In which case, he must already be dismissed.

V. GRIEVANCE

V-A. DEFINITION OF TERMS:

Grievance – any question by either the employer or employee regarding the decision of the Discipline Committee; any dispute or controversy regarding the implementation of company policies which an employee or employees may present to the employer for the purpose of resolving or satisfying the same.

Grievance Committee – a group of persons from the rank-and-file and management who hears and discusses grievance/s presented before it by a petitioner within the company.

Grievance Procedure – this is an appeal procedure that provides for a peaceful way of settling differences and misunderstandings by and between the parties involved.

V-B. GRIEVANCE COMMITTEE:

The Committee shall be composed of two (2) representatives from each department/section: one (1) from the rank-and-file and one (1) from the management.

The Human Resource Section of the HRGA Department shall serve as the Secretariat and shall have no voting power.

Selection of Members of the Grievance Committee

Rank-and-file members (regular employees only) shall be selected by their respective departments in a departmental meeting held for the purpose. Selection may be assisted by the Secretariat and done thru secret balloting or raising of hands. Members of the management are not allowed to attend said selection process.



SOHBI KOHGEI (Phils.), Inc.
Lima Technology Center, Lipa City, Batangas

Document No. ☞ GU.H01.03.03
Revision Date ☞ 22 March 2023
Effective Date ☞ 29 March 2023
Page Number ☞ 4 of 18

GUIDELINES

DISCIPLINARY PROCEEDINGS, GRIEVANCE, HARASSMENT POLICY, DISCRIMINATION POLICY, AND WHISTLEBLOWING POLICY

(continuation)

Management representatives shall be appointed by the top management.

The members of the Committee from the rank-and-file shall serve a term of one (1) year without reappointment or reelection commencing on the first week of January and ending on the last day of December of the same year. However, due to its very limited number, the members of the Committee from the management may be reappointed, at the discretion of the top management.

The Grievance Committee shall have **two functions**:

1. to resolve issues or concerns involving the implementation of company policies; and
2. to resolve appealed decisions of the Discipline Committee

The Secretariat shall see to it that decisions or agreements are properly implemented and communicated to all concerned.

V-C. GRIEVANCE PROCEDURE:

RESPONSIBLE	FLOW DIAGRAM	DETAILS	REFERENCE
Employee/ Complainant, All Concerned Parties	<pre> graph TD A([Acknowledge the Grievance]) --> B[Attend meeting with relevant manager] </pre>	1. An employee presents and discusses a grievance to his immediate superior and DC representative of the concerned department. Together, they agree on a decision, document and sign the same and submit the original copy of said agreement to the Secretariat for record keeping.	Disciplinary Action Records
Employee, All Concerned Parties	<pre> graph TD A([Acknowledge the Grievance]) --> B[Attend meeting with relevant manager] </pre>	2. If the complainant and the immediate superior do not agree, they elevate the issue to the Manager concerned for discussion and agreement. If an agreement or decision is arrived at, the same parties document and sign such decision or agreement, and submit the original copy of the same to the Secretariat for record keeping.	Minutes of the Meeting
Employee, All Concerned Parties	<pre> graph TD A([Acknowledge the Grievance]) --> B[Attend meeting with relevant manager] B --> C[Develop the resolution with the complainant/Completion of Grievance Form] </pre>	3. If the complainant and the manager fail to arrive at a decision or agreement, the employee or employer representative completes a grievance form and submits the same to the Secretariat. If the issue pertains to a decision of the Discipline Committee, the grievance must be filed to the Secretariat within five (5) working days upon receipt of the notice of decision; otherwise, the employee is deemed at default and is considered as having accepted the decision. If the petitioner wishes to be represented, he/she should inform the Secretariat in writing and attach the same to the grievance form.	Grievance Form, Minutes of the Meeting
Secretariat	<pre> graph TD A([Acknowledge the Grievance]) --> B[Attend meeting with relevant manager] B --> C[Develop the resolution with the complainant/Completion of Grievance Form] C --> D[Prepare and review the needed documents] </pre>	4. The Secretariat prepares documents relevant to the policy, employment condition, company practice, or disciplinary action being questioned and submits the same, together with the Grievance Form to the Chairman of the Grievance Committee for review.	Grievance Form, Employee Handbook
Grievance Committee Chairman	<pre> graph TD A([Acknowledge the Grievance]) --> B[Attend meeting with relevant manager] B --> C[Develop the resolution with the complainant/Completion of Grievance Form] C --> D[Prepare and review the needed documents] D --> E[Set a meeting] </pre>	5. The Committee Chairman sets the meeting within five (5) working days after receipt of the Grievance Form and informs the Secretariat for communication to all members and parties concerned.	Grievance Form



SOHBI KOHGEI (Phils.), Inc.
Lima Technology Center, Lipa City, Batangas

Document No. ☞ GU.H01.03.03
Revision Date ☞ 22 March 2023
Effective Date ☞ 29 March 2023
Page Number ☞ 5 of 18

GUIDELINES

DISCIPLINARY PROCEEDINGS, GRIEVANCE, HARASSMENT POLICY, DISCRIMINATION POLICY, AND WHISTLEBLOWING POLICY

(continuation)

RESPONSIBLE	FLOW DIAGRAM	DETAILS	REFERENCE
Grievance Committee, Employee		6. The Committee conducts conference and hears case/s based on the guidelines set for the purpose. If the complainant fails to appear in the scheduled conference without prior notice and valid reason, the Grievance Committee has the right to dismiss the case for lack of interest on the part of the complainant.	Grievance Minutes of the Meeting
Grievance Committee Chairman		7. The Chairman announces before adjournment the decision or disposition on the case/issue presented.	Minutes of the Meeting (Decision)
Secretariat		8. The Secretariat prepares the minutes of the conference / meeting and secures the signature of all members present within two (2) working days.	Minutes of the Meeting
Secretariat		9. The Secretariat prepares a copy of the decision for signature of the Chairman and all the members present, and approval or disapproval of the Top Management or any of his designated representatives. If approved, the Secretariat provides a copy to all members, including the complainant. If disapproved, the Secretariat re-convenes the Committee for disposition. The Secretariat prepares the minutes of the meeting for signature of all members present and approval of the top management.	Minutes of the Meeting

V-D. GUIDELINES:

1. Take up only genuine grievances or valid issues - refuse to deliberate unjustified grievances. Unjustified grievances are those not supported by facts or data, and those not covered by company policies or employment contract. Complainant should be informed of such refusal and the reason for refusal.
2. Decide cases based on merit – get both sides to every grievance and give both parties an opportunity to present their case. Don't make a final decision until both sides of the issue are heard or presented.
3. Do not ignore precedents – always remember that precedents are guides to deciding similar future cases.
4. Do not delay - as much as practicable, issue/s presented or scheduled is/are decided at the end of the conference; otherwise, the Committee sets another hearing or conference at a specific date and time for final disposition. In no case shall an issue be made pending for more than two meetings or conferences.
5. The decision of the Committee must be approved by the top management or any of his authorized representatives. Then and only then the decision of the Committee becomes final and executory.
The top management can veto the decision of the Committee only once per case or issue.

VI. HARASSMENT POLICY



SOHBI KOHGEI (Phils.), Inc.
Lima Technology Center, Lipa City, Batangas

Document No. ☞ GU.H01.03.03
Revision Date ☞ 22 March 2023
Effective Date ☞ 29 March 2023
Page Number ☞ 6 of 18

GUIDELINES

DISCIPLINARY PROCEEDINGS, GRIEVANCE, HARASSMENT POLICY, DISCRIMINATION POLICY, AND WHISTLEBLOWING POLICY

(continuation)

SKPI is aware that the commission of certain acts may appear to be innocent, but, nevertheless create a working environment that is intimidating, hostile, or offensive. These acts and/or behaviors, which may be manifested in several forms, can be described as indecent, vulgar, or even malicious, depending on the sensitivities of the listeners, recipients, and/or audience. Hence, these acts shall be considered as violations only after the offended party has manifested his or her objections to the said acts, and, the respondent continues with the commission of such acts in spite of knowledge of the objections.

a. Harassment may take place:

1. in the premises of the workplace;
2. in any place where the parties were found as a result of work or training responsibilities or relations;
3. at work or education or training-related social functions;
4. while on official business outside the office or during training-related travel;
5. at official conferences, fora, symposia or training sessions; or
6. by telephone, cellular phone, fax machine or electronic mail

1.1 Verbal Harassment includes comments that are offensive or unwelcome regarding a person's national origin, race, color, religion, age, sex, sexual orientation, pregnancy, appearance, disability, gender identity or expression, marital status, or other protected status.

1.1.1 Verbal harassment may include the following as below:

- 1.1.1.1 Jokes**
- 1.1.1.2 Yelling**
- 1.1.1.3 Insinuation** – an unpleasant hint or suggestion of something bad
- 1.1.1.4 Stereotyping** - a standardized mental picture that is held in common by members of a group and that represents an oversimplified opinion, prejudiced attitude, or uncritical judgment.
- 1.1.1.5 Name /Cat-calling** – a form of argument in which insulting or demeaning labels are directed at an individual or group.
- 1.1.1.6 Insults** - a disrespectful or scornfully abusive remark or action
- 1.1.1.7 Threats** - a statement of an intention to inflict pain, injury, damage, or other hostile action on someone in retribution for something done or not done.
- 1.1.1.8 Cursing** - using rude or blasphemous/profane language to express anger or other strong emotion.
- 1.1.1.9 Mocking** - making fun of someone or something in a cruel way; derisive/harsh.

1.2 Non-Verbal Harassment It is a type of abuse undertaken through body language instead of communication that has equally harmful effects.

1.2.1 Non - Verbal harassment may include the following as below:

- 1.2.1.1 Posting images without consent:** Posting an individual's pictures without their consent is a form of non-verbal harassment. This is applicable both in the workplace as well as in romantic relationships. It must be noted that the picture need not be personal. Posting any pictures without prior consent would be considered non-verbal harassment.
- 1.2.1.2 Sending unsolicited pictures:** In the day and age of social media, everyone is connected and has access, ability, and freedom to send pictures to one another. However, sending unsolicited pictures of a promiscuous nature is non-verbal harassment. It is important to understand that while we have the right to send pictures, we do not have the right to send unsolicited promiscuous pictures.
- 1.2.1.3 Gawking or staring:** Any form of uncomfortable leering, staring, or gawking is non-verbal harassment.
- 1.2.1.4 Unwelcome gifts:** Receiving gifts that you do not want or make you uncomfortable is non-verbal harassment. This can also include receiving favors or help that makes you uncomfortable.
- 1.2.1.5 Inappropriate physical touch:** Any form of inappropriate physical touch is a part of nonverbal harassment. This can include putting a hand on the shoulder, grazing something while walking, standing uncomfortably close, and any other touch that makes the person uncomfortable.
- 1.2.1.6 Facial gestures:** Making lewd faces, whistling, and catcalling is also a form of non-verbal harassment.
- 1.2.1.7 Inappropriate hand gestures:** Suggestive hand gestures that make the other person feel embarrassed are non-verbal harassment.
- 1.2.1.8 Posting personal messages or pictures on public forums:** Displaying a person's private messages or photos on a public forum is non-verbal harassment. This can include posting



SOHBI KOHGEI (Phils.), Inc.
Lima Technology Center, Lipa City, Batangas

Document No. ☞ GU.H01.03.03
Revision Date ☞ 22 March 2023
Effective Date ☞ 29 March 2023
Page Number ☞ 7 of 18

GUIDELINES

DISCIPLINARY PROCEEDINGS, GRIEVANCE, HARASSMENT POLICY, DISCRIMINATION POLICY, AND WHISTLEBLOWING POLICY

(continuation)

1.2.1.9 directly on public platforms or even circulating these images and messages through a community of people.
Cyberstalking: This is a new-age form of non-verbal harassment where one may send messages over an online platform. It can also include tracking locations over mobile phones and using this data to stalk an individual in real life.

1.3 **Physical Harassment** – refers to any type of workplace harassment that involves physical attacks. In extreme cases, physical harassment may be classified as assault.

1.4 **Power Harassment** – refers to any kind of behavior in which a superior takes advantage of his or her position in the workplace to cause co-workers physical pain or emotional distress.

1.4.1 Other types of power harassment include:

1.4.1.1 Psychological attacks including intimidation or verbal abuse.

1.4.1.2 Segregation or any kind of ostracism - refers to the act of ignoring and excluding individuals.

1.4.1.3 Excessive demands (e.g., assigning work that is impossible to perform or obviously unnecessary)

1.4.1.4 Demeaning demands (e.g., assigning work clearly below the employee's capability or not assigning work at all)

Intrusion upon the individual, including the employee's personal life.

5.5 **Sexual harassment** is an act, or a series of acts, involving any unwelcome sexual advance, request or demand for a sexual favor, or other verbal or physical behavior of a sexual nature, committed by an employer, employee, manager, supervisor, agent of the employer, trainer, or any other person who has authority, influence or moral ascendancy over another in a work environment (RA 7877 and CSC Res. No. 01-0940).

5.1.1 **Acts of sexual harassment:**

5.1.1.1 unwanted touching of the private parts of the body (genitalia, buttocks and breast);

5.1.1.2 unwanted brushing against a victim's body;

5.1.1.3 malicious touching;

5.1.1.4 surreptitiously looking or staring at a person's private part or worn undergarments;

5.1.1.5 requesting for sexual favor in exchange for employment, promotion, local or foreign travels, favorable working conditions or assignments, a passing grade, or the grant of benefits or payment of a stipend or allowance;

5.1.1.6 derogatory or degrading remarks or innuendoes directed toward the members of one sex, or one's sexual orientation or used to describe a person;

5.1.1.7 verbal abuse with sexual overtones;

5.1.1.8 telling sexist/smutty jokes or sending these through text, electronic mail or other similar means, causing embarrassment or offense and carried out after the offender has been advised that they are offensive or embarrassing or, even without such advice, when they are by their nature clearly embarrassing, offensive or vulgar;

5.1.1.9 malicious leering or ogling;

5.1.1.10 display of sexually offensive pictures, materials or graffiti;

5.1.1.11 unwelcome inquiries or comments about a person's sex life;

5.1.1.12 making offensive hand or body gestures at an employee;

5.1.1.13 persistent unwanted attention with sexual overtones;

5.1.1.14 unwelcome sexual flirtation, advances, propositions

5.1.1.15 unwelcome phone calls with sexual overtones causing discomfort; embarrassment, offense or insult to the receiver; and

5.1.1.16 other similar cases

b. **Persons liable for sexual harassment:**

Any official or employee, regardless of sex, is liable for sexual harassment when he/she:

1. directly participates in the execution of any act of sexual harassment;



SOHBI KOHGEI (Phils.), Inc.
 Lima Technology Center, Lipa City, Batangas

Document No. ☞ GU.H01.03.03
 Revision Date ☞ 22 March 2023
 Effective Date ☞ 29 March 2023
 Page Number ☞ 8 of 18

GUIDELINES

DISCIPLINARY PROCEEDINGS, GRIEVANCE, HARASSMENT POLICY,
DISCRIMINATION POLICY, AND WHISTLEBLOWING POLICY

(continuation)

2. induces or directs another or others to commit sexual harassment;
3. cooperates in the commission of sexual harassment by another through an act without which the sexual harassment would not have been accomplished;
4. cooperates in the commission of sexual harassment by another through previous or simultaneous acts.

VI-A. REPORTING CHANNELS

- a. Employees may report their complaints on whichever of the following channels that are most convenient for the complainant.
 - i. Direct reporting to the complainant's superior.
 - ii. Direct reporting to Human Resource in-charge
 - iii. Whistle Blowing channel (*please refer to GU.H01.03.02 VII.Whistleblowing Policy*)

VI-B. COMMITTEE ON DECORUM

A Committee on Decorum (or Committee as hereinafter referred to) shall be established solely for sexual harassment cases. The Committee shall be composed of fourteen (14) members, seven (7) from the rank-and-file and seven (7) from the management. Selection of rank-and-file representatives may be done through an election in an assembly of at least a majority of the employees per department, or by secret balloting. Management representatives shall be appointed by top management. All departments, regardless of population, must have equal number of representatives in the Committee.

All rank-and-file members of the Committee must be regular employees and shall have a term of two (2) years without re-appointment or re-election. The term of management representatives shall be at the discretion of top management.

The Committee shall have a Chairman and a Vice-Chairman, who shall be elected by members from among themselves. The Chairman shall preside over all meetings of the Committee and cause the investigation of cases. The Vice-Chairman shall take over in the absence of the Chairman.

Likewise, the members shall choose from among themselves a Secretary who shall be responsible for notices of meetings, minutes of meetings and upkeep and maintenance of records of the Committee. HRGA-in-charge shall facilitate all meetings and investigations and ensure that the committee discharges its functions properly

The Committee shall have the following functions:

- a. Receive complaints of sexual harassment;
- b. Investigate sexual harassment complaints in accordance with the prescribed procedure;
- c. Submit a report of its findings with the corresponding recommendation to the Discipline Committee for decision; and
- d. Lead in the conduct of discussions about sexual harassment within the agency or institution to increase understanding and prevent incidents of sexual harassment;

When a member of the Committee is the complainant or the person complained of in a sexual harassment case, he/she shall be disqualified from being a member of the Committee.

VI-C. PROCEDURES IN THE FILING AND INVESTIGATION OF CASES

The following procedures were adopted from the Civil Service Commission Resolution No. 01-0940, otherwise known as Administrative Disciplinary Rules on Sexual Harassment Cases. Some provisions however, have been modified to apply to current conditions in and existing structures, policies and procedures of the company.



SOHBI KOHGEI (Phils.), Inc.
Lima Technology Center, Lipa City, Batangas

Document No. ☞ GU.H01.03.03
Revision Date ☞ 22 March 2023
Effective Date ☞ 29 March 2023
Page Number ☞ 9 of 18

GUIDELINES

DISCIPLINARY PROCEEDINGS, GRIEVANCE, HARASSMENT POLICY, DISCRIMINATION POLICY, AND WHISTLEBLOWING POLICY

(continuation)

RESPONSIBLE	FLOW DIAGRAM	DETAILS	REFERENCE
Complainant, Committee on Decorum	<pre> graph TD A([Files complaint to DC (Pre-filing Stage)]) --> B[2 Submits answer to complaint (3 days)] </pre>	<p>1. The Committee may provide assistance to an alleged victim of sexual harassment which may include counseling, referral to an agency offering professional help, and advice on options available before the filing of the complaint.</p> <p><u>When and how to file the complaint</u></p> <ol style="list-style-type: none"> a. The complaint may be filed at any time with the Discipline Committee, which shall, after preliminary investigation, forward the same to the Committee on Decorum. b. The complaint must be in writing, signed and sworn to by the complainant. It shall contain the following: <ol style="list-style-type: none"> i. the full name, position, department, section of the complainant; ii. the full name, position, department, section of the respondent; iii. a brief statement of the relevant facts; and iv. evidence, in support of the complainant, if any; c. In the absence of any one of the aforementioned requirements, the complaint shall be dismissed without prejudice to its re-filing. d. Where the complaint is not under oath, the complainant shall be summoned by the Committee to swear to the truth of the allegations in the complaint. e. Complaints sent by electronic mail shall not be accepted; f. Withdrawal of the complaint at any stage of the proceedings shall not prevent the Committee from proceeding with the investigation where there is obvious truth or merit to the allegations in the complaint or where there is documentary or direct evidence that can prove the guilt of the person complained of. 	CCVDAF
Respondent	<pre> graph TD B[2 Submits answer to complaint (3 days)] --> C[] </pre>	<p>2. Upon receipt of a complaint that is sufficient in form and substance, the Committee on Decorum shall require the person complained of to submit a Counter-Statement under oath within three (3) days from receipt of the notice, otherwise the Counter-Affidavit/Comment shall be considered as not filed.</p>	Counterstatement



SOHBI KOHGEI (Phils.), Inc.
Lima Technology Center, Lipa City, Batangas

Document No. ☞ GU.H01.03.03
Revision Date ☞ 22 March 2023
Effective Date ☞ 29 March 2023
Page Number ☞ 10 of 18

GUIDELINES

DISCIPLINARY PROCEEDINGS, GRIEVANCE, HARASSMENT POLICY, DISCRIMINATION POLICY, AND WHISTLEBLOWING POLICY

(continuation)

RESPONSIBLE	FLOW DIAGRAM	DETAILS	REFERENCE
Discipline Committee, Committee on Decorum	<pre> graph TD D((D)) --> B3[3 Conducts PI and prepares PIR (3 days)] </pre>	<ol style="list-style-type: none"> 3.1. The Discipline Committee shall, within three (3) days upon receipt of the counter-statement of the respondent, conduct and finish a preliminary investigation which involves examination of documents submitted by both parties, as well as documents readily available from other sources. 3.2. During the preliminary investigation, the parties may submit additional affidavits and counter-affidavits. The Discipline Committee may now determine whether or not sufficient case exists to warrant the issuance of a formal charge. The formal charge shall be issued to the respondent, and endorsed to the Committee on Decorum (with complete records) within two (2) working days upon termination of the preliminary investigation. However, if sufficient case is not established during the preliminary investigation, the complaint shall be dismissed within the same period. 3.3. During preliminary investigation, proceedings before the Discipline Committee shall be held under strict confidentiality. 3.4. Within three (3) working days from receipt of the complaint, the Committee on Decorum shall start the investigation and finish it within ten (10) working days thereafter. 	CCVDAF, Evidences, Testimonies
Discipline Committee, Committee on Decorum	<pre> graph TD B3[3 Conducts PI and prepares PIR (3 days)] --> B4[4 Issues Formal Charges to respondent and indorses case to CD (2days)] </pre>	<ol style="list-style-type: none"> 4.1. The formal charge shall contain a specification of the charge(s), a brief statement of material or relevant facts, accompanied by certified true copies of the documentary evidence, if any, sworn statements covering the testimony of witnesses, a directive to answer the charge(s) in writing under oath in not less than five (5) working days from receipt thereof, an advice for the respondent to indicate in his/her answer whether or not he/she elects a formal investigation of the charge(s), and a notice that he/she is entitled to be assisted by another employee who shall represent him/her in all investigations and hearings. 4.2. Here, the respondent shall be given the opportunity to submit additional evidence. 4.3. The Committee on Decorum shall not entertain requests for clarification, or motions to dismiss which are obviously designed to delay the administrative proceeding. If any of these pleadings is filed by the respondent, the same shall be considered as part of his/her answer which he/she may file within the remaining period for filing the answer. 	New CCVDAF, PIR, Evidences, Testimonies, Memorandum
Respondent	<pre> graph TD B4[4 Issues Formal Charges to respondent and indorses case to CD (2days)] --> B5[5 Answer charges (5 days)] B5 --> E((E)) </pre>	<ol style="list-style-type: none"> 5.1. The answer which must be in writing and under oath, shall be specific and shall include documentary evidence, sworn statements covering testimonies of witnesses, if there be any, in support of respondent's case. It shall also include a statement indicating whether or not he/she elects a formal investigation. 5.2. If the respondent fails or refuses to file his/her answer to the formal charge within five (5) working days from receipt thereof without justifiable cause, he/she shall be considered to have waived his right thereto and formal investigation may commence. 	Testimonies



SOHBI KOHGEI (Phils.), Inc.
Lima Technology Center, Lipa City, Batangas

Document No. ☞ GU.H01.03.03
 Revision Date ☞ 22 March 2023
 Effective Date ☞ 29 March 2023
 Page Number ☞ 11 of 18

GUIDELINES

DISCIPLINARY PROCEEDINGS, GRIEVANCE, HARASSMENT POLICY, DISCRIMINATION POLICY, AND WHISTLEBLOWING POLICY

(continuation)

RESPONSIBLE	FLOW DIAGRAM	DETAILS	REFERENCE
Complainant, Respondent, Committee on Decorum	<pre> graph TD E((E)) --> B6[6 Files PPS (5 days) / Files appeal for reconsideration (3 days) / Decides on Appeal (2days) (Preventive Suspension)] B6 --> F((F)) </pre>	<p>6.1. Upon petition of the complainant or upon the recommendation of the Committee on Decorum, at any time after the service of the Formal Charge to the respondent, the Discipline Committee may order the preventive suspension of the respondent during the formal investigation, if there are reasons to believe that he/she is probably guilty of the charges which would warrant his/her removal from the service.</p> <p>6.2. An order of preventive suspension for twenty-eight (28) days may be issued to temporarily remove the respondent from the scene of his/her misfeasance or malfeasance and to prevent the possibility of his/her exerting undue influence or pressure on the witnesses against him/her or tampering of documentary evidence on file.</p> <p>6.3. When the case against the respondent under preventive suspension is not decided by the Discipline Committee within the period of twenty-eight (28) days after the date of his/her preventive suspension, he/she shall be automatically reinstated into the service: Provided, that when the delay in the disposition of the case is due to the fault, negligence or petition of the respondent, the period of delay should not be included in the counting of the twenty-eight (28) day period. Provided, further, that should the respondent be on paternity/maternity leave, said preventive suspension shall be deferred or interrupted until such time that said leave has been fully enjoyed.</p> <p>6.4. The respondent may file a motion for reconsideration with the Discipline Committee by way of an appeal within three (3) days from receipt thereof. Such a motion shall be decided upon by the Discipline Committee within two (2) days upon receipt. The duration for the filing of a motion for reconsideration and decision-making by the Discipline Committee shall not be included in counting the 10-day investigation of the Committee on the Decorum.</p>	CCVDAF, PIR, Testimonies, Preventive Suspension Order, Appeal
Committee on Decorum, Discipline Committee	<pre> graph TD F((F)) --> B7[7 Continues and finishes FI (5 days) (Conduct of Formal Investigation)] </pre>	<p>7. The investigation shall be held and finished within five (5) days from receipt of the respondent's answer.</p> <p>7.1. <u>Pre-hearing Conference.</u></p> <p>7.1.1. At the commencement of the formal investigation, the Committee on Decorum may conduct a <i>pre-hearing conference</i> for the parties to appear, consider and agree on any of the following:</p> <ol style="list-style-type: none"> stipulation of facts; simplification of issues; identification and marking of evidence of the parties, if any; limiting the number of witnesses, and their names; dates of subsequent hearings; and such other matters as may aid in the prompt and just resolution of the case <p>7.1.2. The parties may submit position paper/memoranda and submit the case for resolution based on the result of the pre-hearing conference without any need for further hearing.</p>	Formal Investigation Report, Memorandum, Evidences, Testimonies



SOHBI KOHGEI (Phils.), Inc.
Lima Technology Center, Lipa City, Batangas

Document No. ☞ GU.H01.03.03
 Revision Date ☞ 22 March 2023
 Effective Date ☞ 29 March 2023
 Page Number ☞ 12 of 18

GUIDELINES

DISCIPLINARY PROCEEDINGS, GRIEVANCE, HARASSMENT POLICY, DISCRIMINATION POLICY, AND WHISTLEBLOWING POLICY

(continuation)

RESPONSIBLE	FLOW DIAGRAM	DETAILS	REFERENCE
(continuation)	<pre> graph TD F((F)) --- G((G)) </pre>	<p>7.1.3. The parties may submit position paper/memoranda and submit the case for resolution based on the result of the pre-hearing conference without any need for further hearing.</p> <p>7.1.4. Where no pre-hearing conference is conducted, the parties, their counsels and witnesses, if any, shall be given a notice of at least one (1) day before the first scheduled hearing specifying the time, date and place of the said hearing and subsequent hearings. Thereafter, the schedule of hearings previously set shall be strictly followed without further notice. No request for postponement may be granted to any party.</p> <p>7.1.5. If the respondent fails to appear during the scheduled hearings despite due notice, the investigation shall proceed and the respondent is deemed to have waived his right to be present and to submit evidence in his favor during those hearings.</p> <p>7.2 <u>Preliminary Matters.</u></p> <p>7.2.1. At the start of the hearing, the Committee on Decorum shall note the appearances of the parties and shall proceed with the reception of evidence for the complainant.</p> <p>7.2.2. If the respondent appears without the aid of a counsel, he/she shall be deemed to have waived his/her right to counsel.</p> <p>7.2.3. Before taking the testimony of a witness, the Committee on Decorum shall place him/her under oath and then take his/her name, address, civil status, age, and place of employment.</p> <p>7.3. <u>Appearance of Parties.</u> Any person representing any of the parties before any hearing or investigation shall manifest orally or in writing his/her appearance for either the respondent or complainant, stating his/her full name, position, department, and section. Any pleading or appearance made without complying with the above stated requirements shall not be recognized.</p> <p>7.4. <u>Order of Hearing.</u></p> <p>7.4.1. Unless the Committee on Decorum directs otherwise, the order of hearing shall be as follows:</p> <ol style="list-style-type: none"> The complainant shall present evidence in support of the charge; The respondent shall then offer evidence in support of his/her defense; The complainant may then offer rebuttal evidence, and the respondent, sur-rebuttal evidence. 	




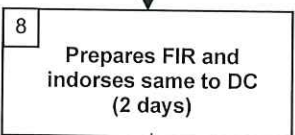
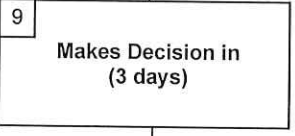
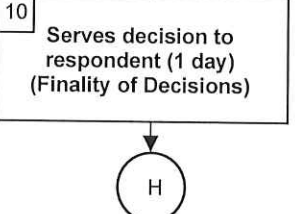
SOHBI KOHGEI (Phils.), Inc.
Lima Technology Center, Lipa City, Batangas

Document No. ☞ GU.H01.03.03
 Revision Date ☞ 22 March 2023
 Effective Date ☞ 29 March 2023
 Page Number ☞ 13 of 18

GUIDELINES

DISCIPLINARY PROCEEDINGS, GRIEVANCE, HARASSMENT POLICY, DISCRIMINATION POLICY, AND WHISTLEBLOWING POLICY

(continuation)

RESPONSIBLE	FLOW DIAGRAM	DETAILS	REFERENCE
(continuation)		<p>7.4.2. Every witness may be examined in the following order:</p> <ol style="list-style-type: none"> Direct examination by the proponent; Cross-examination by the opponent; Re-direct examination by the proponent; Re-cross examination by the opponent. <p>7.4.3. A sworn statement of a witness, properly identified and affirmed by the witness before the Committee on Decorum shall constitute his/her direct testimony.</p> <p>7.5 <u>Markings</u>. All documentary evidence or exhibits shall be properly marked by letters (A, B, C, etc.) if presented by the respondent. These shall form part of the complete records of the case.</p> <p>7.6 <u>Records of Proceedings</u>. The proceedings of the formal investigation must be recorded either through a tape recorder or by any other method.</p> <p>7.7 <u>Effect of the Pendency of the Case</u>. – The pendency of the case shall not disqualify the respondent for regularization, promotion or from claiming maternity/paternity benefits. For this purpose, a case shall be construed as pending when the Discipline Committee has issued a formal charge.</p>	
Committee on Decorum, Discipline Committee		<p>8.1 Within two (2) days after the conclusion of the formal investigation, a report containing a narration of the material facts established during the investigation, the findings and the evidence supporting said findings, as well as the recommendations, shall be submitted by the Committee on Decorum to the Discipline Committee. The complete records of the case shall be attached to the Report of Investigation.</p> <p>8.2 The complete records shall be systematically and chronologically arranged, paged, and securely bound to prevent loss. A table of contents shall be prepared. Whoever is in-charge of the transmittal of the complete records shall be held responsible for any loss or suppression of pages thereof.</p>	FIR, Complete records of case
Committee on Decorum, Discipline Committee		<p>9. The Discipline Committee shall render its decision on the case within three (3) days from receipt of the Report on Investigation.</p>	FIR, Complete records of case, decision
Discipline Committee		<p>10. A decision rendered by the Discipline Committee shall be final and executory after the lapse of the reglementary period for filing an appeal.</p>	Decision



SOHBI KOHGEI (Phils.), Inc.
Lima Technology Center, Lipa City, Batangas

Document No. ☞ GU.H01.03.03
Revision Date ☞ 22 March 2023
Effective Date ☞ 29 March 2023
Page Number ☞ 14 of 18

GUIDELINES

DISCIPLINARY PROCEEDINGS, GRIEVANCE, HARASSMENT POLICY, DISCRIMINATION POLICY, AND WHISTLEBLOWING POLICY

(continuation)

RESPONSIBLE	FLOW DIAGRAM	DETAILS	REFERENCE
Respondent, Complainant		11. The party adversely affected by the decision may file an appeal with the Discipline Committee, through HRGA within five (5) days from receipt thereof.	Copy of decision, Letter of appeal
Discipline Committee		12. An appeal shall be deemed filed on the date stamped on the official copy by the proper receiving authority. Only one appeal shall be entertained.	Complete records of case
Discipline Committee		13. The appeal shall be based on any of the following: 13.1 New evidence has been discovered which materially affects the decision rendered; or 13.2 The decision is not supported by the evidence on record; or 13.3 Errors have been committed prejudicial to the interest of the movant.	Complete records of case, Decision
Complainant		14. The filing of an appeal within the reglementary period shall stay the execution of the decision.	Complete records of case
Discipline Committee		15. The Discipline Committee shall reconvene within two (2) working days upon receipt of the appeal and shall decide on the case within ten (10) working days. The Chairmen and members of the Committee on Decorum and Discipline Committee who fail to act on time on any complaint for sexual harassment properly filed against any employee shall be charged with Neglect of Duty.	Copy of Decision

VII. WORKPLACE DISCRIMINATION POLICY

VII-A Policy Rationale

Sohbi Kohgei (Phils.), Inc. is committed to providing employees with a work environment that is free from discrimination and prohibits forced labor, slavery, involuntary prison labor, trafficking of persons, bonded (including debt bondage), or any form that is relevant. This protects and respects the dignity & rights of employees and maintains the integrity of the employment relationship within the company

VII-B Scope:

This policy is applicable to all SKPI employees and all third parties employed by contract to the company.

VII-C Responsibility:

- A. SKPI Employees
 - a. To properly understand this policy.



SOHBI KOHGEI (Phils.), Inc.

Lima Technology Center, Lipa City, Batangas

Document No. ☞ GU.H01.03.03
 Revision Date ☞ 22 March 2023
 Effective Date ☞ 29 March 2023
 Page Number ☞ 15 of 18

GUIDELINES

DISCIPLINARY PROCEEDINGS, GRIEVANCE, HARASSMENT POLICY, DISCRIMINATION POLICY, AND WHISTLEBLOWING POLICY

(continuation)

- b. To follow and approved and published policy at all times.
- c. To report all workplace discrimination and harassment incidents experienced & witnessed.
- B. HRGA Personnel
 - a. Shall ensure thorough implementation of this guideline.
 - b. Revision and approval of this policy including and up to the General Manager of Administration may be done as necessary.
 - c. Conduct awareness /educational activity of this policy among all employees.

VII-D References:

1. Employee Handbook, Non-Harassment Policy, and Control Republic Act No. 10911
2. Employee Handbook, Employee Conduct and Disciplinary Action
3. Republic Act No. 442
4. Department Order No. 65-04 Section 3. (q.)
5. RA 7877 (Antisocial Harassment)
6. RA 11313 (Safe Spaces Act_
7. Non-Verbal Harassment in the Workplace (getimpactly.com)
8. GU.H01.03.02 VII.Whistleblowing Policy

VII-E Definition:

1. **Discrimination** – any exclusion, restriction or preference, or other differential treatment that is directly or indirectly based on race, color, age, gender, sexual orientation, marital status, political affiliation, union membership, ethnicity or national origin, disability, religion, which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation.
2. **LGBTQ+**– stands for Lesbian, Gay, Bisexual, Transgender, and Queer (or Questioning). The "plus" represents other sexual identities including pansexual and Two-Spirit.
3. **Employment or Occupation** – includes access to training, employment and to particular occupations, and terms and conditions of employment.
4. **Forced labor and slavery** refer to the extraction of work or services from any person by means of enticement, violence, intimidation, or threat, use of force or coercion, including deprivation of freedom, abuse of authority or moral ascendancy, debt bondage, or deception.
5. **Religious Accommodation** - included religious beliefs and practices of all employees and will make, on request, an accommodation for such observances when a reasonable accommodation is available that does not create an undue hardship on the company's business.

VII-F Types of Discrimination:

1. **Age Discrimination**
 - 1.1.1 The Republic Act No. 10911 / Anti-Age Discrimination in Employment prohibits discrimination on account of age and imposes penalties for violation of the act.
 - 1.1.2 Sohbi Kohgei Phils. Inc. support and comply with the law through hiring and promoting equal employment opportunities on the basis of abilities, knowledge, skills, and qualifications rather than age.
 - 1.1.3 Sohbi Kohgei Phils. Inc. equally treated all employees in terms of compensation, benefits, promotion, training, and other employment opportunities.
2. **Disability Discrimination**
 - 1.2.1 The Magna Carta for Disabled Persons (Republic Act No. 7277), as amended provides that qualified employees with a disability shall be subjected to the same terms and conditions of employment as a qualified able-bodied person.
 - 1.2.2 Sohbi Kohgei Phils. Inc. strongly promotes this act through hiring and giving equal opportunities to disabled employees.
3. **Sexual Orientation Discrimination**
 - 1.3.1 Anti-Discrimination Bill prohibits discriminatory practices based on Sexual Orientation and Gender Identity (SOGI), thus our company supports equal treatment and mandates awareness to all employees.



SOHBI KOHGEI (Phils.), Inc.
Lima Technology Center, Lipa City, Batangas

Document No. ☞ GU.H01.03.03
Revision Date ☞ 22 March 2023
Effective Date ☞ 29 March 2023
Page Number ☞ 16 of 18

GUIDELINES

DISCIPLINARY PROCEEDINGS, GRIEVANCE, HARASSMENT POLICY, DISCRIMINATION POLICY, AND WHISTLEBLOWING POLICY

(continuation)

4. Religion Discrimination

1.4.1 Under Article III Section 5 of The 1987 Constitution of the Republic of the Philippines provides that:

1.4.1.1 *"No law shall be made respecting an establishment of religion or prohibiting the free exercise thereof. The free exercise and enjoyment of religious profession and worship, without discrimination or preference, shall forever be allowed. No religious test shall be required for the exercise of civil or political rights".*

1.4.1.2 An employee whose religious beliefs or practices conflict with his or her job, work schedule, or with the company's policy or practice on dress and appearance, or with other aspects of employment, and who seeks a religious accommodation must submit a written request for the accommodation to his or her immediate supervisor. The written request will include the type of religious conflict that exists and the employee's suggested accommodation.

1.4.1.3 All our employees who need to perform special religious activities may utilize the company's meeting rooms provided that they have informed their superiors & booked the meeting rooms in advance.

5. Gender Discrimination

1.5.1 The Magna Carta of Women (Republic Act no. 9710, as amended) prohibits discrimination against women & expressly imposes liability for damages on the person directly responsible for such discrimination.

1.5.2 Salient features of the law include:

1.5.2.1 Section #22 – Right to Decent Work states that "The state shall progressively realize and ensure decent work standards for women that involve the creation of jobs of acceptable quality in conditions of freedom, equity, security, and human dignity"

6. Race/Ethnicity/National Origin Discrimination

1.6.1 The Indigenous People's Rights Act (Republic Act No. 8371) prohibits discrimination against Indigenous Cultural Communities or Indigenous Peoples with respect to recruitment and conditions of employment on account of their descent

VIII. WHISTLEBLOWING POLICY

VII-B Policy Rationale

Sohbi Kohgei (Phils.), Inc. (SKPI) is committed to carry out its functions with the highest degree of professionalism, effectiveness and transparency. All employees are expected to conduct its affairs, operation and business in compliance with all applicable laws, rules and regulations.

Procedure in Handling of Reported Cases

SKPI established a system for handling complaints/reported cases of violations which shall be acted upon by management and shall be investigated upon expeditiously by a legal counsel and the HRGA.



SOHBI KOHGEI (Phils.), Inc.
Lima Technology Center, Lipa City, Batangas

Document No. ⇨ GU.H01.03.03
Revision Date ⇨ 22 March 2023
Effective Date ⇨ 29 March 2023
Page Number ⇨ 17 of 18

GUIDELINES

DISCIPLINARY PROCEEDINGS, GRIEVANCE, HARASSMENT POLICY, DISCRIMINATION POLICY, AND WHISTLEBLOWING POLICY

(continuation)

RESPONSIBLE	FLOW DIAGRAM	DETAILS	REFERENCE
Complainant		<p>1. Complaints/Cases of violation may be reported through the following channels:</p> <p>1.1 Form: Whistle Blower Report Form (\\skpi-fsdfs\Document Control\05. IMS FORMS\HRGA\F.H01.01.00\WhistleBlower Report Form.xlsx)</p> <p>1.2 E-mail: lotlot.castano@sohbi.com.ph</p> <p>1.3 Mail: c/o HRGA, SOHBI KOHGEI (PHILS.), INC. LIMA Technology Center, Lipa City, Batangas</p> <p>1.4 Telephone: (043) 981- 3830 loc. 113</p> <p>1.5 Mobile (Call/SMS): 0917-821-2925</p> <p>1.6 Face-to-Face Meeting with HRGA Supervisor/Manager or any trusted SKPI Manager</p>	WBRF Documented Records
Complainant		<p>2. Reports of complaints/violations should include the following information:</p> <ul style="list-style-type: none"> • Full name and position of employee being reported; • Specific conditions/actions/omissions being complained; • Laws/rules/regulation violated; and • Full name and position of the whistleblower/ reporting employee. <p>The complainant shall attach all relevant information/evidence in support of the complaint/reported case.</p>	WBRF Documented Records
Complainant		<p>3. If the Whistleblower does not want his/her identity disclosed, he/she may still choose to report the case through any of the above-mentioned channels provided that the details and relevant information pertaining to the case is divulged and complete. SKPI shall accept anonymous reporting and shall ensure non-disclosure of the identity of the whistleblower at all times.</p>	Documented Records

VII-A Confidentiality and Protection from Retaliation

SKPI shall ensure integrity of received information pertaining to the reported case and shall treat all data and evidence gathered with utmost confidentiality and are protected from unauthorized dissemination, disclosure and/or release, unless required by law.

Further, management shall guarantee protection of the whistleblower/reporting employee from retaliatory acts or disciplinary action provided the report was made in good faith, with merit and/or supporting evidence and does not merely intend to falsely accuse or destroy a person's reputation.



SOHBI KOHGEI (Phils.), Inc.
Lima Technology Center, Lipa City, Batangas

Document No. ☞ GU.H01.03.03
Revision Date ☞ 22 March 2023
Effective Date ☞ 29 March 2023
Page Number ☞ 18 of 18