



CODE OF CONDUCT

Lockton Philippines Insurance and Reinsurance Brokers, Inc.

INTRODUCTION

Since its establishment in the Philippines in 1994, Lockton Philippines Insurance and Reinsurance Brokers, Inc. has been guided by a commitment to excellence, integrity, and ethical business practices. Our work is grounded in core values that define who we are as an organization.

We are committed to the highest standards of excellence, to treating others with respect and care, and to recognizing our Associates as our most valuable assets. We provide opportunities for growth, support exemplary performance, and deliver innovative solutions that make a meaningful difference to our clients' people and businesses.

The Lockton Philippines Code of Conduct provides a framework for ethical behavior, accountability, and fairness. It sets clear expectations for all Associates, ensuring integrity in every action, valuing and nurturing client and carrier relationships, and empowering Associates to achieve their full potential.

Adherence to this Code reinforces Lockton Philippines' commitment to delivering exceptional service to Associates, clients, and the communities it serves.

RATIONALE

Company rules and regulations, herein embodied as a part of Code of Conduct (hereafter referred to as “Code”) are established to guide all employees in their work behavior and performance. These are necessary to ensure the orderly conduct of business and to afford protection to both the Company and its employees.

When violation of Company rules and regulations occurs, disciplinary action is imposed to correct rather than punish the individual. Disciplinary action may vary depending on the history, circumstances and gravity of the offense. In all instances, the employee shall be treated fairly and accorded his right to due process.

RESPONSIBILITY

The Code applies to all employees, regardless of status and location. It is every employees’ responsibility to know the Company rules and regulations and to be guided by such in his work conduct and performance.

Company officers, managers, supervisors and other persons vested with supervisory function or authority shall be responsible for enforcing and implementing these rules and regulations.

The Human Resources Department (HRD) and the Admin Department shall monitor the enforcement of company rules and regulations, ensuring due process and fair implementation of the appropriate disciplinary action.

Violations shall be reported immediately in writing to the immediate superior of the employee concerned, copy furnished the HRD. The incident report should be addressed to the department manager of the employee involved and should contain the following: name of the employee who committed the violation, nature and time of commission; witnesses, if any; the loss, damage or injury resulting from the offense. HRD shall ensure that the incident report is acted upon within seven working days from receipt of the addressee manager.

DUE PROCESS

Every employee shall be accorded due process in case of violation of any Company rules and regulations prior to the imposition of any disciplinary action. This means providing the employee ample opportunity to explain his side, and giving notice of the disciplinary action to be imposed and the cause for such in conformity with the approved guidelines.

All records pertaining to the case proceedings shall be kept in the employee's 201 file.



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