ASKI SANCTIONS CODE OF CONDUCT VIOLATIONS

Alalay Sa Kaunlaran, Inc. (ASKI), a Filipino MFI, believes that ethical staff behavior is a critical component of both good customer service and human resources management. ASKI implements their written "Code of Conduct and Discipline" through staff training, staff performance reviews, client satisfaction surveys, and the ASKI Values Protocol— an established process for addressing staff violations of the Code.

The Values Protocol establishes clear steps for handling staff violations:

- 1. The case is documented by the employee's immediate supervisor or auditor.
- 2. This documentation is presented to the employee's manager for review, if appropriate. If it is not appropriate to involve the immediate supervisor, the case is reviewed at a higher level, to ensure an objective assessment.
- 3. The Internal Audit Team conducts and documents an initial investigation, and it presents the findings to an Ethics Committee, which is led by the Human Resources department.
- 4. The Ethics Committee reviews the case and selects an appropriate sanction using the Code of Conduct and Discipline Manual as reference. Sanctions depend on the gravity of the offense.
- 5. Senior management follows up on the case to make sure appropriate steps were taken to resolve the issue.
- 6. The outcomes are documented by the immediate supervisor (unless implicated, this is the Branch Manager) and presented to the Ethics Committee. If the committee is satisfied with the outcomes, they declare the case closed.

An employee who receives any disciplinary action is ineligible for promotion for one year. Of course, more serious offenses may result in employee probation or termination. On the other hand, positive feedback is reflected in the employee's performance evaluation. The regular staff performance appraisal report includes an item relating to staff policy compliance. ASKI also recognizes outstanding staff members and uses compliance on Code of Ethics policies as indicator for this award.