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ALCOHOL-FREE WORKPLACE POLICIES AND PROGRAMS

OBJECTIVE

Discovery World Corporation (DWC), herein referred to as the “Company”, adopts an alcohol-free workplace policy and program to ensure a safe and healthful workplace for its employees, guests, and stakeholders. In this regard, all employees shall abide by the terms and conditions of this policy.

I. POLICY STATEMENT

Discovery explicitly prohibits the following:

- A. Use, possession, solicitation or sale of alcohol in the workplace; or
- B. Impairment or under the influence of alcohol which may cause/causing adverse effect on an employee’s work performance, the safety of co-employees, or on DWC’s brand or reputation.

II. DEFINITION OF TERMS

- A. *Assessment Team* - A group of persons composed of occupational safety and health employees, the Chief Compliance Officer, and employees who are trained to address all aspects of prevention.
- B. *Cause Testing* - A form of alcohol-test assessment conducted by DWC or its accredited provider when an employee is suspected to be under the influence of alcohol. DWC requests its suspected employee to submit to alcohol testing.
- C. *Involved in an on-the-job accident or injury* - An accident of any person (employee or any other stakeholder) within the workplace immediately or proximately caused by the employee under the influence of alcohol.
- D. *Near Miss* - An incident which could have led to any injury or fatality of employees or stakeholders and/or considerable damage to the Company had it not been immediately addressed.
- E. *Post-Accident Testing* - A form of alcohol-test assessment conducted by DWC or its accredited provider to those employees involved in an on-the-job accident or injury.

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- F. *Random Testing* - A form of alcohol test assessment conducted by DWC or its accredited provider. Employees may be selected at random for alcohol testing at any interval determined by DWC.
- G. *Workplace* - Any office or property owned, leased or operated by the DWC or at any other place where an employee performs work for the Company.

III. PREVENTIVE MEASURES

- A. *Policy Awareness* - This policy must be included in the Company on-boarding program. During on-boarding, each new hire must receive 2 copies of this full policy. One copy must be acknowledged to have been received and understood, with the new hire's printed name and signature affixed and returned to Compliance Office for inclusion in the employee's 201 file. The other copy must be retained by the employee and immediately made available when required by Compliance Office.

This policy and the programs must likewise be clearly visible and kept posted on the Company bulletin board at all times.

- B. *Committee for an Alcohol-Free Workplace* – The Company shall have a Committee for an Alcohol-Free Workplace (otherwise known as the CFAFW) whose responsibility it is to establish, drive, and sustain an alcohol-free workplace policy awareness program. Every department must be represented.
- C. *Alcohol-Free Workplace Program* - The program must contain the following:
1. Dangers involved in the use, possession, solicitation, or sale of alcohol in the workplace;
 2. Policy of maintaining an alcohol-free workplace;
 3. Assistance available to the employee; and
 4. Sanctions for those found to have violated this policy to be found in the section on Disciplinary Action.
- D. *Reporting of an employee suspected to be violating this policy* - Any employee, regardless of status, position, or job rank, may report co-employee/s whose behavior has given rise to the suspicion of involvement in the use, possession, solicitation, or selling of alcohol in the workplace.

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The reporting employee must submit a written and signed report to either the Head of Security or Chief Compliance Officer.

Upon receipt, said Officer must, not later than 24 hours, convene the CFAFW to determine the validity and accuracy of the report. Upon establishing cause, the CFAFW must decide whether to proceed with the Testing Procedure or with the immediate sanctioning, depending on the nature of the offense. The decision of the CFAFW must be made not later than 24 hours from the time that it convened for this purpose.

- E. *In case of imminent risk or danger* - The CFAFW may, on certain occasions when there is imminent danger to the lives or security of other employees and stakeholders, immediately impose sanctions on the suspected employee and proceed with the measures as established by the Security Department.

After the situation has been declared to be under control, the Committee must convene to assess what had happened, identify points of vulnerability, and establish immediately measures to ensure the same does not happen again.

- F. *Documentation of all minutes and proceedings* – The CFAFW is required to document all of the minutes of its meetings and proceedings. The attending representatives must affix their signatures on the documents which recommend or impose sanctions and penalties. Said documentation must be electronically stored to ensure its security.

IV. POLICIES AND PROCEDURES

A. Employee's Behavior

If an employee's behavior has given reason for any of the other employees or stakeholders to suspect that he or she is using, possessing, soliciting or selling alcohol in the workplace, the Company will request the former to submit to a cause-test. If the employee objects to subject to a cause-test, the employee must submit the objection/s and the reason/s in writing to the Committee for an Alcohol-Free Workplace. The CFAFW shall immediately decide whether the ground/s for objection is valid. Should the CFAFW determine that the objection is not valid and the employee still refuses to submit to the cause-test, the refusal will be considered as a ground for disciplinary action found in this policy and the Code of Conduct; and

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If the test results turn out to be positive, CFAFW will refer the employee to the Assessment Team for further examination. However, should the employee further disagree with the results, the said employee will be sent to a mutually agreed upon medical facility for another round of medical tests. The findings of this test shall be final.

B. Accident or Near-Miss

If an accident or a near miss has been immediately or proximately caused by employees engaged in using possessing, soliciting or selling alcohol in the workplace, all employees involved in the on-the-job accident shall be subjected to a post-accident-test. If the employee objects to subject to a cause-test, the said employees must state the objection/s and the reason thereof in writing. The CFAFW shall immediately decide whether the ground for objection is valid or not. Should the CFAFW determine that the objection is not valid and the employee continues to refuse to submit to the cause-test, the refusal will be considered as a ground for disciplinary action; and

If the cause-test showed a positive result, the employee/s will be referred to Assessment Team for further examination. The findings of the assessment team shall be considered final.

C. Random Testing

At any time during the working hours, the Company may conduct a random alcohol test with its employees. If the employee objects to subject to a cause-test, the employee must submit the objection/s and the reason/s in writing to the Committee for an Alcohol-Free Workplace. The CFAFW shall immediately decide whether the ground/s for objection is valid. Should the CFAFW determine that the objection is not valid and the employee still refuses to submit to the cause-test, the refusal will be considered as a ground for disciplinary action under the provisions of this policy; and

If the test results turn out to be positive, Compliance Office will refer the employee to an accredited Assessment Team for further examination. However, should the employee further disagree with the results, the said employee will be sent to a mutually agreed upon medical facility for another round of medical tests. The findings of this test shall be considered as final.

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DWC shall observe at all times confidentiality of the results relative to alcohol tests done to employees.

VI. TREATMENT, REHABILITATION, AND REFERRAL

The Assessment Team shall determine whether or not an employee found addicted to alcohol would need referral for treatment and/or rehabilitation in a Department of Health-Accredited Center. This benefit is only given to employees who seek help from the Assessment Team

VII. MONITORING AND EVALUATION

The implementation of the alcohol-free workplace policy and program shall be monitored and evaluated periodically by the Assessment Team to ensure that the goal of an alcohol-free workplace is met.

VIII. DISCIPLINARY ACTION

- A. Failure to submit to cause-test, post accident-test, random-test, or alcohol test by a nearest medical facility shall be a ground for a disciplinary action with a penalty of one (1) month suspension without pay;
- B. If an employee found guilty for violation of any of the acts prohibited under this policy shall be subjected to a disciplinary action with a penalty of one (1) month suspension without pay; or
- C. If an employee found to have been guilty for violation of this policy, repeatedly violated the provisions thereof shall be subjected to a disciplinary action with a penalty of three (3) months suspension or dismissal from service;
- D. The sanctions imposed by this policy are part of what has been socially legislated. Therefore, the disciplinary actions set forth in this policy on an Alcohol-Free Workplace shall prevail over the sanctions and penalties imposed by DWC's Code of Conduct.

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This Policy shall take effect immediately and shall be made known to all employees.

Issued by:

(Original signed)

Anna May B. Nieva
Chief Compliance Officer

November 18, 2014

Date

Approved by:

(Original signed)

John Y. Tiu, Jr.
President

November 18, 2014

Date

Violations of any of the provisions contained in this policy are governed by DWC's Code of Conduct, if applicable.

Discovery World Corporation shall have the sole and exclusive prerogative to add, amend, revise, and/or delete this policy. In the event that there is a need to add, amend, revise, and or delete portions of this policy, the Chief Compliance Officer must first submit to the President its request citing the reasons for the change. If approved, the said change shall be made by DWC.

In the event any portion of this policy is repealed by provision of law, it shall not affect the remaining provisions that are consistent with the law.