

D Disclosure and Transparency				
	Question	Answer	Remarks	Source Documents
D.1 Transparent ownership structure				
D.1.1	Does the information on shareholdings reveal the identity of beneficial owners, holding 5% shareholding or more?	Y	The 2014 General Information Sheet, pages 4 & 5 submitted to SEC contains the list of shareholders (direct and indirect) of the Company and their corresponding holdings.	2014 General Information Sheet (GIS)
D.1.2	Does the company disclose the direct and indirect (deemed) shareholdings of major and/or substantial shareholders?	Y	The 2014 General Information Sheet, pages 4 & 5 submitted to SEC contains the list of shareholders (direct and indirect) of the Company and their corresponding holdings.	2014 General Information Sheet (GIS)
D.1.3	Does the company disclose the direct and indirect (deemed) shareholdings of directors (commissioners)?	Y	The 2014 General Information Sheet, pages 4 & 5 submitted to SEC contains the list of shareholders (direct and indirect) of the Company and their corresponding holdings.	2014 General Information Sheet (GIS)
D.1.4	Does the company disclose the direct and indirect (deemed) shareholdings of senior management?	Y	The 2014 General Information Sheet, pages 4 & 5 submitted to SEC contains the list of senior management of the Company (i.e. President and Executive Vice Presidents) and their corresponding holdings to the Company.	<ul style="list-style-type: none"> • Annual Report, p. 5, List of Stockholders • 2014 General Information Sheet (GIS)
D.1.5	Does the company disclose details of the subsidiaries, associates, joint ventures and special purpose enterprises/ vehicles (SPEs)/ (SPVs)?	Y	The details of the Company's subsidiaries, associates, joint ventures and special purpose enterprises are disclosed in the Annual Report.	2014 Annual Report
D.2 Quality of Annual Report				
	Does the company's annual report disclose the following items:			
D.2.1	Key risks	Y	The particular item is sufficiently disclosed in the Annual Report of the Company.	2014 Annual Report, p.16 , Risk Management
D.2.2	Corporate objectives	Y	The Vision, Mission and Values of the Company are sufficiently disclosed in the Annual Performance Report of the Company.	2014 Annual Report, p. 1
D.2.3	Financial performance indicators	Y	The 2014 Financial Highlights, as well as the Statement of Financial Position and Total Comprehensive Income of the Company as of 13 December 2014, are sufficiently disclosed in the Annual Report of the Company.	2014 Annual Report, pages 2-4
D.2.4	Non-financial performance indicators	N	The non-financial performance indicators and other achievements of the Company are not disclosed in the Annual Report of the Company.	
D.2.5	Dividend policy	N	The Company adheres to the requirements of the Corporation Code of the Philippines and the National Internal Revenue Code of the Philippines.	
D.2.6	Details of whistle-blowing policy	Y	The details of the Whistleblower Policy are sufficiently disclosed in the Annual Report of the Company.	2014 Annual Report
D.2.7	Biographical details (at least age, qualifications, date of first appointment, relevant experience, and any other directorships of listed companies) of directors/commissioners	Y	The Biographical Details of the directors are sufficiently disclosed in the Annual Report of the Company.	2014 Annual Report

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D.2.8	Training and/or continuing education programme attended by each director/commissioner	Y	The Orientation Program and Training requirements of the Board are sufficiently disclosed in the Annual Report of the Company.	2014 Annual Report
D.2.9	Number of board of directors/commissioners meetings held during the year	Y	The particular item is sufficiently disclosed in the Annual Report of the Company.	2014 Annual Report, p. 14 - Board & Committee Meetings
D.2.10	Attendance details of each director/commissioner in respect of meetings held	Y	The particular item is sufficiently disclosed in the Annual Report of the Company.	2014 Annual Report, p. 14 - Board & Committee Meetings
D.2.11	Details of remuneration of the CEO and each member of the board of directors/commissioners	N	The particular item was not disclosed in the Annual Report of the Company.	
	Corporate Governance Confirmation Statement			
D.2.12	Does the Annual Report contain a statement confirming the company's full compliance with the code of corporate governance and where there is non-compliance, identify and explain reasons for each such issue?	Y	The Annual Report of the Company contains a statement confirming the Company's full compliance with the Code of Corporate Governance.	2014 Annual Report, p. 12 - Corporate Governance
D.3.	Disclosure of related party transactions (RPT)			
D.3.1	Does the company disclose its policy covering the review and approval of material/significant RPTs?	Y	The particular policy is expressly provided in the Manual of Corporate Governance and sufficiently disclosed in the Annual Performance Report of the Company.	<ul style="list-style-type: none"> • Manual of Corporate Governance, p. 13 - Related Party Transaction • 2014 Annual Report, p. 16 - Related Party Transaction
D.3.2	Does the company disclose the name of the related party and relationship for each material/significant RPT?	Y	The particular item, if any, is sufficiently disclosed in the Annual Report of the Company.	2014 Annual Report, p. 16 - Related Party Transaction
D.3.3	Does the company disclose the nature and value for each material/significant RPT?	Y	The nature and significant RPTs, if any, is sufficiently disclosed in the Annual Report and the Audited Financial Statements of the Company.	2014 Annual Report, p. 16 - Related Party Transaction
D.4	Directors and commissioners dealings in shares of the company			
D.4.1	Does the company disclose trading in the company's shares by insiders?	Y	No disclosure required since the Company does not trade its shares.	2014 Annual Report, pages 15-16, Operating Philosophy
D.5	External auditor and Auditor Report			
D.5.1	Are audit fees disclosed?	N	The company deems not disclose the Audit Fees of the External Auditor.	
	Where the same audit firm is engaged for both audit and non-audit services,			
D.5.2	Are the non-audit fees disclosed?	N/A	The Company engages its External Auditor for audited services only.	
D.5.3	Does the non-audit fees exceed the audit fees?	N/A	The Company engages its External Auditor for audited services only.	

Question		Answer	Remarks	Source Documents
D.6 Medium of communications				
	Does the company use the following modes of communication?			
D.6.1	Quarterly reporting	Y	The Company uses quarterly reporting as one of its modes of communication.	Company Website/Customer Newsletter
D.6.2	Company website	Y	The Company uses its website as one of its modes of communication.	Company Website
D.6.3	Analyst's briefing	N/A	Not Applicable item as per Insurance Commission Guidelines on Compliance with ACGS (Circular Letter No. 2015-13).	
D.6.4	Media briefings /press conferences	Y	The Company uses media briefings and press conferences as one of its modes of communication.	Company Website/Press Releases
D.7 Timely filing/release of annual/financial reports				
D.7.1	Is the audited annual financial report released within 120 days from the financial year end?	Y	The Audited Financial Statements of the Company are released to the directors and the shareholders prior to the scheduled Board and annual stockholders' meetings. The AFS is then submitted to the regulators within the period required by them.	Minutes of the Annual Stockholders' Meeting
D.7.2	Is the audited annual financial report released within 90 days from the financial year end?	N		
D.7.3	Is the audited annual/financial report released within 60 days from the financial year end?	N		
D.7.4	Is the true and fairness/fair representation of the annual financial statement/reports affirmed by the board of directors/commissioners and/or the relevant officers of the company?	Y	The Board of Directors and the Shareholders regularly approve and affirm the Annual Financial Statements of the Company.	<ul style="list-style-type: none"> • 2014 Annual Report • Minutes of the Annual Stockholders' Meeting
D.8 Company website				
	Does the company have a website disclosing up-to-date information on the following:			
D.8.1	Business operations	Y	The Company website discloses among others information relating to business operations of the Company.	Company Website
D.8.2	Financial statements/reports (current and prior years)	Y	The Company website discloses among others information relating to financial statements of the Company.	Company Website
D.8.3	Materials provided in briefings to analysts and media	Y	The Company website discloses among others information relating to briefings to analysts and media.	Company Website
D.8.4	Shareholding structure	Y	The Company website discloses among others information relating to the Company's group corporate structure.	Company Website
D.8.5	Group corporate structure	Y	The Company website discloses among others information relating to the Company's group corporate structure.	Company Website

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D.8.6	Downloadable annual report	Y	The Company website contains the downloadable Annual Performance Report of the Company.	Company Website
D.8.7	Notice of AGM and/or EGM	Y	The Company website contains the Notice of the Annual Stockholders' Meeting of the Company.	Company Website
D.8.8	Company's constitution (company's by-laws, memorandum and articles of association)	Y	The Company website contains the Company's Articles of Incorporation and By-Laws.	Company Website
D.8.9	All of the above (D.8.1 to D.8.8) are available in English	Y	All of the above information are in English language.	Company Website
D.9 Investor relations				
D.9.1	Does the company disclose the contact details (e.g. telephone, fax, and email) of the officer responsible for investor relations?	N/A	Not Applicable item as per Insurance Commission Guidelines on Compliance with ACGS (Circular Letter No. 2015-13). Since the Company is not a publicly-listed company, it has no contact details required herein. However, the Company has in its website a Hotline which can be used by all its stakeholders (i.e. customers, employees, and investors of affiliate companies) and the public.	Company Website