

COMPANY NAME : BPI-PHILAM LIFE ASSURANCE (BPLAC) CORPORATION
 COMPANY STRUCTURE : CLASS 3
 FINANCIAL YEAR END : 2018
 SECTOR : INSURANCE

D.1 Transparent ownership structure

D.1	Transparent ownership structure		Y/N	Reference/Source Document
D.1.1	Does the information on shareholdings reveal the identity of beneficial owners, holding 5% shareholding or more?	OECD Principle V: Disclosure and Transparency (A) Disclosure should include, but not limited to, material information on: (3) Major share ownership and voting rights, including group structures, intra-group relations, ownership data, and beneficial ownership.	Y	BPI-Philam is 51% owned by Philam Life and 47.67% owned by BPI. The Annual Report discloses the list of BPI-Philam's stockholders and their corresponding holdings. Source Documents: <ul style="list-style-type: none"> 2018 Annual Report, page 32 - List of Stockholders
D.1.2	Does the company disclose the direct and indirect (deemed) shareholdings of major and/or substantial shareholders?	ICGN 7.6 Disclosure of ownership ... the disclosure should include a description of the relationship of the company to other companies in the corporate group, data on major shareholders and any other information necessary for a proper understanding of the company's relationship with its public shareholders.	Y	BPI-Philam is 51% owned by Philam Life and 47.67% owned by BPI. The Annual Report discloses the list of BPI-Philam's stockholders and their corresponding holdings. The Company has more than seventy minority stockholder, 1.33% ownership in the Company. One (1) nominal share is given to the members of the Board. The Annual Report discloses the list of Philam Life's stockholders and their corresponding holdings. Other than those assigned to their respective nominated directors, the two (2) major stockholders have no other direct and indirect shareholdings to the Company. Source Documents: <ul style="list-style-type: none"> 2018 Annual Report, page 32 - List of Stockholders
D.1.3	Does the company disclose the direct and indirect (deemed) shareholdings of directors (commissioners)?		Y	The company disclose the direct and indirect shareholders of directors through its Annual Report. Other than their respective nominal share, directors have no direct and indirect shareholdings to the Company. Source Documents: <ul style="list-style-type: none"> 2018 Annual Report, page 32 - List of Stockholders
D.1.4	Does the company disclose the direct and indirect (deemed) shareholdings of senior management?		Y	The company disclose the direct and indirect shareholders of directors through its Annual Report. Senior Management has no direct and indirect shareholdings to the Company. Source Documents: <ul style="list-style-type: none"> 2018 Annual Report, page 32 - List of Stockholders
D.1.5	Does the company disclose details of the parent/holding company, subsidiaries, associates, joint ventures and special purpose enterprises/ vehicles (SPEs)/ (SPVs)?		Y	BPI-Philam has two (2) major parent companies, Philam Life, a premier life insurance company in the Philippines and a market leader for over 60 years, and BPI a leading commercial bank in the country with over 160 years of experience in the local banking industry and an extensive branch network. Source Documents: <ul style="list-style-type: none"> 2018 Annual Report, page 32 - List of Stockholders

D.2	Quality of Annual Report			
<i>Does the company's annual report disclose the following items:</i>				
D.2.1	Key risks	<p>OECD Principle V (A): (1) The financial and operating results of the company; (2) Company objectives, including ethics, environment, and other public policy commitments; (3) Major share ownership and voting rights, including group structures, intra-group relations, ownership data, beneficial ownership; (4) Remuneration policy for members of the board and key executives, including their qualifications, the selection process, other company directorships and whether they are regarded as independent by the board; (6) Foreseeable risk factors, including risk management system; (7) Issues regarding employees and other stakeholders; (8) Governance structure and policies, in particular, the content of any corporate governance code or policy and the process by which it is implemented.</p> <p>OECD Principle V (E): Channels for disseminating information should provide for equal, timely and cost-efficient access to relevant information by users.</p> <p>ICGN 2.4 Composition and structure of the board ICGN 2.4.1 Skills and experience ICGN 2.4.3 Independence</p> <p>ICGN 5.0 Remuneration ICGN 5.4 Transparency</p> <p>UK Corporate Governance Code (2010) A.1.2 - the number of meetings of the board and those committees and individual attendance by directors.</p> <p>CLSA-ACGA (2010) CG Watch 2010 - Appendix 2 (I) CG rules and practices (19) Disclose the exact remuneration of individual directors.</p>	Y	<p>The Annual Report discloses BPI-Philam's identified key risks. BPI-Philam's follows a Risk Management Framework (RMF) which identifies, quantifies, and mitigates risks within the Company.</p> <p>Source Document: 2018 Annual Report, pages 69 to 71 – ENTERPRISE RISK MANAGEMENT</p>
D.2.2	Corporate Objectives	<p>OECD Principle V (A): (1) The financial and operating results of the company; (2) Company objectives, including ethics, environment, and other public policy commitments; (3) Major share ownership and voting rights, including group structures, intra-group relations, ownership data, beneficial ownership; (4) Remuneration policy for members of the board and key executives, including their qualifications, the selection process, other company directorships and whether they are regarded as independent by the board; (6) Foreseeable risk factors, including risk management system; (7) Issues regarding employees and other stakeholders; (8) Governance structure and policies, in particular, the content of any corporate governance code or policy and the process by which it is implemented.</p> <p>OECD Principle V (E): Channels for disseminating information should provide for equal, timely and cost-efficient access to relevant information by users.</p> <p>ICGN 2.4 Composition and structure of the board ICGN 2.4.1 Skills and experience ICGN 2.4.3 Independence</p> <p>ICGN 5.0 Remuneration ICGN 5.4 Transparency</p> <p>UK Corporate Governance Code (2010) A.1.2 - the number of meetings of the board and those committees and individual attendance by directors.</p> <p>CLSA-ACGA (2010) CG Watch 2010 - Appendix 2 (I) CG rules and practices (19) Disclose the exact remuneration of individual directors.</p>	Y	<p>It is BPI-Philam's vision to be the leading life insurance company in the country by making insurance accessible and personalized to every Filipino. BPI-Philam remain true to our mission of making insurance accessible and personalized for every Filipino. Our primary focus for the coming years is to bring real value and better protection to our customers as we encourage them to live longer, healthier, and better lives. We are a company that embraces change as we work on establishing better foundations along with our goals. BPI-Philam aims to further expand and grow its efforts, ensuring that we conduct our business in a deliberate pace with compliance to the industry's policies and regulations.</p> <p>Source Document: 2018 Annual Report, page 3, VISION AND MISSION</p>
D.2.3	Financial performance indicators		Y	<p>The Company's financial highlights and position for 2018 are sufficiently disclosed in the 2018 Annual Report.</p> <p>Source Document: 2018 Annual Report, pages 7 to 8 FINANCIAL HIGHLIGHTS</p>

D.2.4	Non-financial performance indicators		<p>Y</p> <p>For two (2) straight years, BPLAC was recognized by the World Finance Magazine as the “Best Life Insurance Company” in the Philippines. The non-financial performance indicators and other achievements of the Company are sufficiently disclosed in the Annual Report of the Company.</p> <p>Source Document: 2018 Annual Report, page 6 – CEO MESSAGE</p>
D.2.5	Dividend policy		<p>Y</p> <p>BPLAC shall declare and pay cash dividends, the amount of which shall be determined through consideration of the following factors: a) local statutory requirements relating to solvency and liquidity; b) ongoing sustainability of corresponding insurance fund taking into consideration likely future changes in regulatory requirements; and c) likely future strategic initiatives.</p> <p>For 2018, the Company declared a cash dividend of P1.89 per share or a total of Philippine Pesos: One Million Four Hundred Eighty Eight Thousand Six Hundred Twenty and 31/10, payable to all shareholders of the Company in proportion to their shareholdings.</p> <p>Source Documents:</p> <ul style="list-style-type: none"> ▪ 2018 Annual Report, page 54 – DIVIDEND POLICY
D.2.6	Details of whistle-blowing policy		<p>Y</p> <p>BPI-Philam’s Whistleblow Programme is sufficiently disclosed in the Annual Report. BPI-Philam does business with integrity and follows the highest ethical principles. Any employee (or anyone else) may and are highly encouraged to raise concerns of misconduct or wrongdoing within the Company that can allow investigation to fix any problems.</p> <p>The Policy is designed to provide for protection in case there is a threat to the security of the Whistleblower. Employees or other individuals will not suffer retaliation for reporting suspected wrongdoing in good faith as this is prohibited by the Company. Reporting concerns or suspicions may be made by multiple means provided in the AIA Code of Conduct.</p> <p>The report may also be made by the employee by using the AIA Group Ethics and Compliance Hotline 1010-5511-00 + 800-245-4179, which is available 24 hours a day, 7 days a week. The employee is encouraged to provide as much detailed information as possible and may remain anonymous if he/she wishes. The policy is also discussed in further detail in the AIA Code of Conduct.</p> <p>Source Document: 2018 Annual Report, page 68 – The Whistleblow Program</p>

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	<p>The biographical details of BPI-Philam's directors are fully disclosed in the Annual Report of the Company. These details include, among others, the director's age, date of first appointment, relevant experience, and directorships in other listed and non-listed companies.</p> <p>Source Document: 2018 Annual Report, pages 35 to 44 – Board of Directors Profile</p>
D.2.8	Training and/or continuing education programme attended by each director/commissioner	Y	<p>For newly elected directors, the Corporate Secretary schedules and provides comprehensive orientation to explain the organizational profile, charters, by laws, policies and procedures of the Company. In compliance with Circular issued by the Insurance Commission, BPI-Philam ensures that all its directors have attended a training and orientation course on Corporate Governance conducted by duly accredited training providers of the Commissions. The Board members are also encouraged to attend further training and inform the Corporation on such trainings attended. BPI-Philam provides necessary resources in developing and updating its director's knowledge and capabilities. The Company encourages the directors to attend continuous professional education programs such as Professional Directors' Program of the Institute of Corporate Directors.</p> <p>Source Document: 2018 Annual Report, page 52 – ORIENTATION PROGRAMME AND TRAINING</p>
D.2.9	Number of board of directors/commissioners meetings held during the year	Y	<p>In 2018, the Board of Directors of BPI-Philam met five (5) times, as properly disclosed in the Annual Report of the Company. The following are the dates of the Board of Directors' meetings:</p> <p>16 January 2018 – Regular Meeting of the Board of Directors 16 April 2018 – Outgoing Board of Directors Meeting 16 April 2018 – Organizational Meeting of the Board of Directors 10 May 2018 – Special Meeting of the Board of Directors 29 May 2018 - Special Meeting of the Board of Directors 20 July 2018 – Regular Meeting of the Board of Directors 15 October 2018 – Regular Meeting of the Board of Directors 09 November 2018 - Special Meeting of the Board of Directors</p> <p>Source Documents: 2018 Annual Report, page 56 – Meetings held and attended for the year 2018</p>

D.2.10	Attendance details of each director/commissioner in respect of meetings held		Y	<p>The attendance details of each director are disclosed in the 2018 Annual Report.</p> <p>The following directors posted an attendance rate of 100%:</p> <ol style="list-style-type: none"> 1. Ariel G. Cantos (8/8) 2. Surendra Menon (8/8) 3. Romeo L. Bernardo (8/8) 4. Cezar P. Consing (8/8) 5. Jesus P. Tambunting (8/8) 6. Joseph Gotuaco (7/7) 7. Simon Paterno (1/1) 8. Ryan Robert Quinn (1/1) 9. Jacky Chan (3/3) <p>Aurelio Luis R. Montinola only attended 2/3 meetings in 2018 (66%) before he resigned in 15 June 2018. Simon R. Paterno and Ryan Robert Quinn attended 1 of 1 meeting in 2018 before they resigned effective 16 April 2018. Jacky Chan attended three of 3 meetings in 2018 (37.50%) from his appointment on 15 June 2018. Mr. Darren Thompson, who resigned on 16 April 2018, did not attend any meeting in 2018.</p> <p>Source Document: 2018 Annual Report, page 56 – Meetings held and attended for the year 2018</p>
D.2.11	Details of remuneration of each member of the board of directors/commissioners		Y	<p>The remuneration of directors was disclosed in the 2018 Annual Report of the Company.</p> <p>Source Document: 2018 Annual Report, pages 50 to 51 - Fee Structure and Remuneration of Directors</p>
	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?	<p>OECD PRINCIPLE V (A) (8)</p> <p>UK CODE (JUNE 2010): Listing Rules 9.8.6 R (for UK incorporated companies) and 9.8.7 R (for overseas incorporated companies) state that in the case of a company that has a Premium listing of equity shares, the following items must be included in its Annual Report and accounts: a statement of how the listed company has applied the Main Principles set out in the UK CG Code, in a manner that would enable shareholders to evaluate how the principles have been applied; a statement as to whether the listed company has complied throughout the accounting period with all relevant provisions set out in the UK CG Code; or not complied throughout the accounting period with all relevant</p>	Y	<p>BPI-Philam confirms its full compliance with the Code of Corporate Governance. Its commitment to the highest standards of corporate governance is rooted in the belief that a culture of integrity and transparency is essential to the consistent achievement of its common goals. Creating a sustainable culture, where trust and accountability are vital as skill and wisdom, steers us towards achieving long-term value for shareholders and clients, and strengthens our confidence in the institution.</p> <p>The 2018 Annual Report contains a statement confirming BPI-Philam's full compliance with the Code of Corporate Governance in page 49.</p> <p>Source Document: 2018 Annual Report, page 48 – CORPORATE GOVERNANCE</p>

		<p>provisions set out in the UK CG Code, and if so, setting out:</p> <p>(i) those provisions, if any, it has not complied with;</p> <p>(ii) in the case of provisions whose requirements are of a continuing nature, the period within which, if any, it did not comply with some or all of those provisions; and</p> <p>(iii) the company's reasons for non-compliance.</p> <p>ASX CODE: Under ASX Listing Rule 4.10.3, companies are required to provide a statement in their Annual Report disclosing the extent to which they have followed the Recommendations in the reporting period. Where companies have not followed all the Recommendations, they must identify the Recommendations that have not been followed and give reasons for not following them. Annual Reporting does not diminish the company's obligation to provide disclosure under ASX Listing Rule 3.1.</p>		
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?	<p>OECD Principle V: Disclosure and Transparency</p> <p>(A) Disclosure should include, but not limited to, material information on:</p> <p>(5) Related party transactions</p> <p>ICGN 2.11.1 Related party transactions</p> <p>The company should disclose details of all material related party transactions in its Annual Report.</p>	Y	<p>The Company has adopted a Related Party Transactions (RPT) Policy, which sets forth the necessary control system to ensure the effective management of related party transactions. The Policy requires that all RPTs should be on normal commercial terms, at arm's length, and fair and reasonable in the interest of BPLAC. The Company has put in place an effective price discovery system (i.e. transfer pricing study) and due diligence process to determine the fair price for RPTs.</p> <p>The RPT Policy and Approval Process is sufficiently disclosed in the Annual Report.</p> <p>Source Documents: 2018 Annual Report, pages 64 to 65 Related Party Transactions Policy</p>
D.3.2	Does the company disclose the name of the related party and relationship for each material/significant RPT?		Y	<p>Details of related party relationship and transactions are provided in Note 25 of the 2018 Audited Financial Statement. The Company has no RPTs that can be classified as financial assistance to entities other than wholly-owned subsidiary companies. The Company ensures that RPTs are conducted in such a way that they are fair and at arms' length, and discloses such facts in its Annual Performance Report and the Audited Financial Statements.</p>

				<p>Source Document:</p> <ul style="list-style-type: none"> ▪ 2018 Annual Report, pages 64 to 65 – RELATED PARTY TRANSACTION ▪ 2018 Annual Report, pages 78 to 81 – RELATED PARTY TRANSACTION ▪ RPT Report submitted to regulators
D.3.3	Does the company disclose the nature and value for each material/significant RPT?		Y	<p>Details of related party relationship and transactions are provided in Note 25 of the 2018 Audited Financial Statement. The Company has no RPTs that can be classified as financial assistance to entities other than wholly-owned subsidiary companies. The Company ensures that RPTs are conducted in such a way that they are fair and at arms' length, and discloses such facts in its Annual Performance Report and the Audited Financial Statements.</p> <p>Source Document:</p> <ul style="list-style-type: none"> ▪ 2018 Annual Report, pages 64 to 65 – RELATED PARTY TRANSACTION ▪ 2018 Annual Report, pages 78 to 81 – RELATED PARTY TRANSACTION ▪ RPT Report submitted to regulators
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?	<p>OECD Principle V (A): (3) Major share ownership and voting rights</p> <p>ICGN 3.5 Employee share dealing Companies should have clear rules regarding any trading by directors and employees in the company's own securities.</p> <p>ICGN 5.5 Share ownership Every company should have and disclose a policy concerning ownership of shares of the company by senior managers and executive directors with the objective of aligning the interests of these key executives with those of shareholders.</p>	N/A	<p>Since BPI-Philam does not trade its shares, no disclosure required.</p> <p>Source Document: 2018 Annual Report, page 63 – Prevention of Insider Trading & Price Sensitive Information</p>
D.5	External auditor and Auditor Report			
D.5.1	Are audit fees disclosed?	<p>OECD Principle V (C): An annual audit should be conducted by an independent, competent and qualified, auditor in order to provide an external and objective assurance to the board and shareholders that the financial statements fairly represent the financial position and performance of the company in all material respects.</p>	Y	<p>BPLAC has engaged the audit services of Isla Lipana & Co. for 2018 with an Audit Fee of P2,709,901.00.</p> <p>Source Document:</p> <ul style="list-style-type: none"> ▪ 2018 Annual Report, Page 72. External Auditors ▪ Isla Lipana Certification
	<i>Where the same audit firm is engaged for both audit and non-audit services</i>			
D.5.2	Are the non-audit fees disclosed?	<p>OECD Principle V (D): External auditors should be accountable to the shareholders and owe a duty to the company to exercise</p>	Y	<p>BPLAC engages its External Auditors, Isla Lipana & Co./PricewaterhouseCoopers, for audit services only. Thus, there was no non-audit fees to be disclosed in the Annual Report.</p>

		<p>due professional care in the conduct of the audit.</p> <p>ICGN 6.5 Ethical standards (Audit) The auditors should observe high-quality auditing and ethical standards. To limit the possible risk of possible conflicts of interest, non-audit services and fees paid to auditors for non-audit services should be both approved in advance by the audit committee and disclosed in the Annual Report.</p>		<p>Source Document:</p> <ul style="list-style-type: none"> ▪ 2018 Annual Report. Page. 72. External Auditors ▪ Isla Lipana Certification
D.5.3	Does the non-audit fee exceed the audit fees?		N	<p>Since BPI-Philam did not engage Isla Lipana & Co./PricewaterhouseCoopers for non-audit services, the non-audit fee did not exceed the audit fees.</p> <p>Source Document:</p> <ul style="list-style-type: none"> ▪ 2018 Annual Report. Page. 72. External Auditors ▪ Isla Lipana Certification
D.6	Medium of communications			
	<i>Does the company use the following modes of communication?</i>			
D.6.1	Quarterly reporting	<p>OECD Principle V (E): Channels for disseminating information should provide for equal, timely and cost-efficient access to relevant information by users.</p> <p>ICGN 7.1 Transparent and open communication Every company should aspire to transparent and open communication about its aims, its challenges, its achievements and its failures.</p> <p>ICGN 7.2 Timely disclosure Companies should disclose relevant and material information concerning themselves on a timely basis, in particular meeting market guidelines where they exist, so as to allow investors to make informed decisions about the acquisition, ownership obligations and rights, and sales of shares.</p>	Y	<p>To regularly update the general public and stakeholders on the developments and activities of the Company, BPI-Philam utilizes different channels such as but not limited to digital media (includes website and owned social media properties), press releases, TV interviews, media round table discussions, and annual report.</p> <p>Internally, the Company utilizes an internal communication module called 'PhilamWebmaster', where the employees are regularly apprised of any significant milestones, events, and developments in the Company. There is also a quarterly Townhall for employees to communicate major developments and directions within the organization.</p> <p>With the launch of BPI-Philam's Facebook page, they created another avenue to publish their content and effectively reach out to their existing customers and untapped market. Through these digital platforms they emphasized thought leadership by releasing financial and lifestyle-themed articles surrounding financial literacy.</p> <p>Finally, BPI-Philam also bolstered their advertising initiatives to better introduce their consumer base to their products by effectively utilizing Facebook and Google advertisements which suggest products to users based on their preferences.</p> <p>Source Documents:</p> <ul style="list-style-type: none"> ▪ Company Website: www.bpi-philam.com ▪ 2018 Annual Report

D.6.2	Company website		Y	BPI-Philam regularly updates and uses its company website as a tool for BPI-Philam to communicate with its stakeholders. News and materials are shared through the Company website. Source Document: Company Website: http://www.bpi-philam.com/
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) dated 8 May 2015. BPI-Philam uses its own investment analyst who regularly reports to the Board, Management, Employee and Client Forums.
D.6.4	Media briefings /press conferences		Y	BPI-Philam had two media conference in 2018 for the launch of the product Life Ready Plus, and also for the launch of the Wellness Series product suite. This was picked up by a couple of media outlets. Source Documents: <ul style="list-style-type: none"> ▪ The Manila Times - http://www.manilatimes.net/bpi-philam-launches-affordable-insurance-product/339029/ ▪ Orange Magazine - http://orangemagazine.ph/2017/bpi-philam-celebrate-being-stronger-together/
D.7	Timely filing/release of annual/financial reports			
D.7.1	Are the audited annual financial report / statement released within 120 days from the financial year end?	OECD Principle V (C) OECD Principle V (E) OECD Principle V-(A). ICGN 7.2 Timely disclosure ICGN 7.3 Affirmation of financial statements The board of directors and the corporate officers of the company should affirm at least annually the accuracy of the company's financial statements or financial accounts.	N	The Company's Audited Financial Report was released within 120 days from the financial year end in compliance with SEC requirements. The Audited Financial Statements of BP-Philam Life was approved by the Stockholders on 10 April 2019, and submitted/released to the Securities and Exchange Commission and the Bureau of Internal Revenue on 25 April 2019. Source Documents: Minutes of the Annual Stockholders Meeting dated 10 April 2019, page 4
D.7.2	Is the annual report released within 120 days from the financial year end?		N	The 2018 Annual Report of BPI-Philam was released during the Board of Directors and Annual Stockholders' meetings on 10 April 2019. Source Document: Minutes of the Annual Stockholders Meeting dated 10 April 2019, page 4
D.7.3	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 true and fairness/fair representation of the annual financial statement was affirmed by the Audit Committee of the Company. The Audit Committee has reviewed and approved the scope and coverage of the Statutory Audit for the year 2018. Although Management has the primary responsibility for the financial statements and reporting process, the Audit Committee having the oversight role, has noted and reviewed the audited

				<p>financial statements for the calendar year 2018, and concurred and accepted the conclusion of the External Auditors on the financial statements. The Audit Committee was satisfied that the financial statements were in compliance with Philippine Financial Reporting Standards as assessed by the External Auditors.</p> <p>Source Document: 2018 Annual Report, pages 72 – ENGAGEMENT WITH EXTERNAL AUDITORS</p>
D.8	Company website			
	<i>Does the company have a website disclosing up-to-date information on the following:</i>			
D.8.1	Business operations	<p>OECD Principle V (A)</p> <p>OECD Principle V (E)</p> <p>ICGN 7.1 Transparent and open communication</p>	Y	<p>BPI-Philam's website discloses among others information relating to business operations of the Company.</p> <p>Source Document: Company Website: www.bpi-philam.com</p>
D.8.2	Financial statements/reports (current and prior years)	ICGN 7.2 Timely disclosure	Y	<p>BPI-Philam's website discloses among others information relating to the financial statements of the Company for 2018 and prior years.</p> <p>Source Document: Company Website: www.bpi-philam.com - Published Synopsis</p>
D.8.3	Materials provided in briefings to analysts and media		Y	<p>BPI-Philam's website discloses among others information relating to briefings to analysts and media. Materials provided in briefings are made available in the Media Center section.</p> <p>Source Document: Company Website: www.bpi-philam.com</p>
D.8.4	Shareholding structure		Y	<p>The Company's shareholding structure is indicated in the 2018 Annual Report, which is disclosed in the Company Website.</p> <p>Source Document: 2018 Annual Report, page 32 – List of Stockholders</p>
D.8.5	Group corporate structure		Y	<p>The Group's Corporate Structure is indicated in the 2018 Annual Report, which is disclosed in the Company Website.</p> <p>Source Document: 2018 Annual Report, page 1, BPI-PHILAM AT A GLANCE</p>
D.8.6	Downloadable annual report		Y	<p>BPI-Philam's website discloses the Annual Performance Report of the Company in the Corporate Governance Section. The Annual Reports since 2012 are made available for viewing and downloading on BPI-Philam Life's website.</p> <p>Source Document: Company website: www.bpi-philam.com – Corporate Governance Section, Annual Report</p>

D.8.7	Notice of AGM and/or EGM		Y	BPI-Philam's website discloses the Notice of the Annual Stockholders' Meeting of the Company on 10 April 2019 in the Corporate Governance Section. Source Document: Company Website: www.bpi-philam.com – Corporate Governance Section, 2019 Notice of Annual Stockholders Meeting
D.8.8	Minutes of AGM and/or EGM		Y	BPI-Philam's website discloses the Minutes of the Annual Stockholders' Meeting of the Company last 10 April 2019 in the Corporate Governance Section. Source Document: Company Website: www.bpi-philam.com – Corporate Governance Section, Minutes of the Annual Stockholders Meeting dated 10 April 2019
D.8.9	Company's constitution (company's by-laws, memorandum and articles of association)		Y	BPI-Philam's website discloses the Articles of Incorporation and By-Laws of the Company in the Corporate Governance Section. Source Documents: <ul style="list-style-type: none"> ▪ Company Website: www.bpi-philam.com – Corporate Governance Section, Articles of Incorporation ▪ Company Website: www.bpi-philam.com – Corporate Governance Section, By-Laws
D.9	Investor relations			
D.9.1	Does the company disclose the contact details (e.g. telephone, fax, and email) of the officer / office responsible for investor relations?	ICGN 7.1 Transparent and open communication	Y	Not Applicable Item as per Insurance Commission Guidelines on Compliance with ACGS (Circular Letter No. 2015-13). Since BPI-Philam is not a publicly-listed company, it has no contact details required herein. However, BPI-Philam makes sure that all its stakeholders (i.e. customers, employees, investors of affiliate companies, and general public) have the avenue to voice their concerns and/or complaints. In its Contact Us section in the Company Website, BPI-Philam provides its stakeholders different channels through which stakeholders can get in touch with the Company. The contact details include an e-mail address, the head office telephone number, and each branch's address and telephone number. There is also a form, which the stakeholder can fill out.