

COMPANY NAME : BPI-PHILAM LIFE ASSURANCE (BPLAC) CORPORATION
 COMPANY STRUCTURE : CLASS 3
 FINANCIAL YEAR END : 2019
 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: 2019 Annual Report, page 21 - 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: 2019 Annual Report, page 21 - 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: 2019 Annual Report, page 21 - 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: 2019 Annual Report, page 21 - 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: 2019 Annual Report, page 21 - 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>Y</p> <p>The Company's operational risk, on the other hand is managed using the Operational Risk and Control Framework (ORCF).</p> <p>The framework starts with a prescription of the risk taxonomy. The taxonomy is an inventory of Operational Risks which is also known as Key Operational Risk (KOR).</p> <p>At least once in a year, Business Units are required to assess the KORs that are applicable to their operations for proper risk management. At an Enterprise Level, an Executive Committee has been identified to own each of these KORs for management and governance.</p> <p>KORs is divided into nine high level risks, namely: (1) Conduct; (2) Execution, Delivery & Process Management; (3) External Event; (4) Financial Crime; (5) Fraud; (6) People; (7) Information; (8) Technology and (9) Legal & Compliance. These KORs are further broken down to more granularity against which specific controls are defined and regularly assessed for effectiveness.</p> <p>An independent Audit Function acts as the third line of defense to provide to the Board of Directors insights of risk control effectiveness.</p> <p>Source Document: 2019 Annual Report, pages 47 to 50 – ENTERPRISE RISK MANAGEMENT</p>
D.2.2	Corporate Objectives	<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>	<p>Y</p> <p>It is BPI-Philam's vision is to make sure that insurance is easy to get and easy to have for every Filipino, no matter what class they belong to. BPI-Philam remain true to our mission to be the leading life insurance company in the country by making insurance accessible, affordable, and personalized for every Filipino.</p> <p>We continue to embrace our brand promise of Healthier, Longer, Better Lives through activities that invites employees to be healthy and active. A Nourish Your Body campaign was launched last July 2019 to encourage employees to eat healthy. Leveled-up Let's Get Active, a monthly-long Exercise To Energize campaign that offered variety of fitness classes such as Basketball, Volleyball, Bowling, Dance and HIIT classes were held last August 2019.</p> <p>We have launched a new HR Service Delivery Model under Project Optimus. This aims to transform and modernize the way we work so that leaders and staff are able to focus on delivering the propel strategies and BAU HR transactions are easy and efficient. With just three (3) clicks employees are able to gather</p>

			<p>information or transact through the Employee Portal and Workday.</p> <p>As we continue our journey to Major and Undisputed, it is important that employees are fully equipped with materials and resources to do the work right. We want our people to work in a dynamic environment that encourages innovation, collaboration among colleagues, and an environment that fosters high-performance; thus, a young, active and vibrant newly renovated Head Office was established last December 2019.</p> <p>2019 marked BPI Philam’s 10 years in the business. A well-deserved EDM Festival-inspired celebration was organized to recognize the contribution and hard-work of all 1,857 BPI-Philam employees. A decade has gone by and HR continues to stay true to our very core of providing desirable employee experience thus elevating the future of both our employees and customers.</p> <p>Source Document:</p> <ul style="list-style-type: none"> • 2019 Annual Report, page 6, VISION AND MISSION • 2019 Annual Report, page 17, Transforming and Modernizing the Way We Work
D.2.3	Financial performance indicators		<p>Y The Company’s financial highlights and position for 2019 are sufficiently disclosed in the 2019 Annual Report.</p> <p>Source Document: 2019 Annual Report, pages 8 to 9 FINANCIAL HIGHLIGHTS</p>
D.2.4	Non-financial performance indicators		<p>Y For three consecutive 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: 2019 Annual Report, page 7 – CEO MESSAGE</p>
D.2.5	Dividend policy		<p>Y 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 the year 2019, the Company declared cash dividend of Pesos One & Seventy Six Centavos (P1.76) per share, or a total amount of Pesos One Billion Three Hundred Nineteen Million, Nine Hundred Eighty Nine Thousand Four Hundred</p>

			<p>Three Pesos and Four Centavos (P1,319,989,403.04), Philippine Currency, payable to all shareholders of the Company in proportion to their holdings as of 10 April 2019, payable immediately upon receipt of all required approvals.</p> <p>Source Documents: 2019 Annual Report, page 31 – DIVIDEND POLICY</p>
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: 2019 Annual Report, page 40 – 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		<p>Y</p> <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: 2019 Annual Report, pages 22 to 25 – Board of Directors Profile</p>
D.2.8	Training and/or continuing education programme attended by each director/commissioner		<p>Y</p> <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</p>

				<p>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: 2019 Annual Report, pages 28 to 29 – ORIENTATION PROGRAMME AND TRAINING and SEMINARS ATTENDED</p>
D.2.9	Number of board of directors/commissioners meetings held during the year		Y	<p>In 2019, 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>21 January 2019 – Regular Meeting of the Board of Directors 10 April 2019 – Outgoing Board of Directors Meeting 10 April 2019 – Organizational Meeting of the Board of Directors 16 July 2019 – Regular Meeting of the Board of Directors 16 October 2019 – Regular Meeting of the Board of Directors</p> <p>Source Documents: 2019 Annual Report, page 33 – Meetings held and attended for the year 2019</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 2019 Annual Report.</p> <p>Seven (6) of the directors has 100% attendance while Mr. Consing has 80.00% attendance, for an overall attendance rate of 97.80%.</p> <p>Source Document: 2019 Annual Report, page 33 – Meetings held and attended for the year 2019</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 2019 Annual Report of the Company.</p> <p>Source Document: 2019 Annual Report, page 27 - 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</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,</p>

		<p>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 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>		<p>and strengthens our confidence in the institution.</p> <p>The 2019 Annual Report contains a statement confirming BPI-Philam's full compliance with the Code of Corporate Governance in page 26.</p> <p>Source Document: 2019 Annual Report, page 26 – CORPORATE GOVERNANCE</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 (A) Disclosure should include, but not limited to, material information on: (5) Related party transactions</p> <p>ICGN 2.11.1 Related party transactions 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: 2019 Annual Report, pages 39 to 40, 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 28 of the 2019 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"> ▪ 2019 Annual Report, pages 55 to 60 – RELATED PARTY TRANSACTIONS ▪ 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 28 of the 2019 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"> ▪ 2019 Annual Report, pages 55 to 60 – RELATED PARTY TRANSACTIONS ▪ 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: 2019 Annual Report, page 41 – 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</p>	Y	<p>BPLAC has engaged the audit services of Isla Lipana & Co. for 2019, the audit fees amounted to Philippine Pesos: Three Million Thirty Three Thousand Three Hundred Thirty Three (PhP3,033,333.00), exclusive of out-of-pocket expenses and value added tax (VAT). There were no non-audit fees paid to Isla Lipana & Co./PricewaterhouseCoopers for 2019.</p> <p>Source Document:</p>

		performance of the company in all material respects.		<ul style="list-style-type: none"> ▪ 2019 Annual Report. Page 47, Engagement with External Auditors ▪ PWC Corp. Governance Certification for 2019
	Where the same audit firm is engaged for both audit and non-audit services	OECD Principle V (D): External auditors should be accountable to the shareholders and owe a duty to the company to exercise due professional care in the conduct of the audit.		
D.5.2	Are the non-audit fees disclosed?	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.	Y	<p>BPLAC engages its External Auditors, Isla Lipana & Co./PricewaterhouseCoopers, for audit services only. There were no non-audit fees paid to Isla Lipana & Co./PricewaterhouseCoopers for 2019. Thus, there was no non-audit fees to be disclosed in the Annual Report.</p> <p>Source Document:</p> <ul style="list-style-type: none"> ▪ 2019 Annual Report. Page 47, Engagement with External Auditors ▪ PWC Corp. Governance Certification for 2019
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"> ▪ 2019 Annual Report. Page 47, Engagement with External Auditors ▪ PWC Corp. Governance Certification for 2019
D.6	Medium of communications			
	Does the company use the following modes of communication?			
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</p>

				<p>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 2019 Annual Report
D.6.2	Company website		Y	<p>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.</p> <p>Source Document: Company Website: www.bpi-philam.com</p>
D.6.3	Analyst's briefing		N/A	<p>Not applicable item as per Insurance Commission Guidelines on Compliance with ACGS (Circular Letter No. 2015-23) dated 8 May 2015.</p> <p>BPI-Philam uses its own investment analyst who regularly reports to the Board, Management, Employee and Client Forums.</p>
D.6.4	Media briefings /press conferences		Y	<p>BPI-Philam had two media conference in 2019 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.</p> <p>Source Documents:</p> <ul style="list-style-type: none"> The Manila Times - http://www.manilatimes.net/bpi-philam-launches-affordable-insurance-product/339029/ Orange Magazine – https://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?	<p>OECD Principle V (C)</p> <p>OECD Principle V (E) OECD Principle V-(A).</p> <p>ICGN 7.2 Timely disclosure</p> <p>ICGN 7.3 Affirmation of financial statements</p> <p>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.</p>	Y	<p>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 BPI-Philam was approved by the Stockholders on 17 April 2020, and submitted/released to the regulators on 22 May 2020.</p> <p>Source Documents:</p> <ul style="list-style-type: none"> Minutes of the Annual Stockholders Meeting held on 17 April 2020, page 4 Email Acknowledgement of SEC dated 22 May 2020
D.7.2	Is the annual report released within 120 days from the financial year end?		Y	<p>The 2019 Annual Report of BPI-Philam was approved and released during the Board of Directors and Annual Stockholders' meetings on 17 April 2020. The Annual Report was also released in the Company Website.</p> <p>Source Documents:</p> <ul style="list-style-type: none"> Minutes of the 17 April 2020 Annual Stockholders Meeting, page 4

				<ul style="list-style-type: none"> Company Website – Corporate Governance Section, 2019 Annual Report
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?			<p>Y</p> <p>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 2019. 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 financial statements for the calendar year 2019, 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: 2019 Annual Report, pages 47 – ENGAGEMENT WITH EXTERNAL AUDITORS</p>
D.8	Company website	Does the company have a website disclosing up-to-date information on the following:		
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 2019 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 2019 Annual Report, which is disclosed in the Company Website.</p> <p>Source Document: Company Website: 2019 Annual Report, page 21 – List of Stockholders</p>
D.8.5	Group corporate structure		Y	<p>The Company website discloses among others information relating to the Company's group corporate structure.</p> <p>Source Document:</p>

				<ul style="list-style-type: none"> ▪ Company Website: 2019 Annual Report, BPI-Philam At A Glance, page 4 ▪ IC Report on Conglomerate Structure for 2019
D.8.6	Downloadable annual report			<p>Y</p> <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			<p>Y</p> <p>BPI-Philam's website discloses the Notice of the Annual Stockholders' Meeting of the Company on 17 April 2020 in the Corporate Governance Section.</p> <p>Source Document: Company Website: www.bpi-philam.com – Corporate Governance Section, 2020 Notice of Annual Stockholders Meeting</p>
D.8.8	Minutes of AGM and/or EGM			<p>Y</p> <p>BPI-Philam's website discloses the Minutes of the Annual Stockholders' Meeting of the Company last 17 April 2020 in the Corporate Governance Section.</p> <p>Source Document: Company Website: www.bpi-philam.com – Corporate Governance Section, Minutes of the Annual Stockholders Meeting dated 17 April 2020</p>
D.8.9	Company's constitution (company's by-laws, memorandum and articles of association)			<p>Y</p> <p>BPI-Philam's website discloses the Articles of Incorporation and By-Laws of the Company in the Corporate Governance Section.</p> <p>Source Documents:</p> <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	<p>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.</p>