

COMPANY NAME : THE PHILIPPINE AMERICAN LIFE AND GENERAL INSURANCE (PHILAM LIFE) COMPANY
 COMPANY STRUCTURE : CLASS 2
 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?	<p>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.</p> <p>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.</p>	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>Philam Life is 99.99993% owned by AIA Company Limited. The Annual Report discloses the list of Philam Life's stockholders and their corresponding holdings.</p> <p>Source Documents: 2019 Annual Report, page 52 - List of Stockholders</p>
D.1.2	Does the company disclose the direct and indirect (deemed) shareholdings of major and/or substantial shareholders?		N/A	<p>Not Applicable Item as per Insurance Commission Guidelines on Compliance with ACGS (Circular Letter No. 2015-23) 8 May 2015.</p> <p>Philam Life is 99.99993% owned by AIA Company Limited. The Company only has one minority stockholder, the Estate of Luis Yulo, with 0.00007% 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.</p> <p>Source Documents: 2019 Annual Report, page 52 - List of Stockholders</p>
D.1.3	Does the company disclose the direct and indirect (deemed) shareholdings of directors (commissioners)?		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>Source Documents: 2019 Annual Report, page 52 - List of Stockholders</p>
D.1.4	Does the company disclose the direct and indirect (deemed) shareholdings of senior management?		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>Source Documents: 2019 Annual Report, page 52 - List of Stockholders</p>
D.1.5	Does the company disclose details of the parent/holding company, subsidiaries, associates, joint ventures and special purpose enterprises/ vehicles (SPEs)/ (SPVs)?		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>Philam Life has various affiliates and subsidiary such as BPI-Philam Life Assurance Corporation (BPLAC), which is a strategic alliance between two leading financial companies in the Philippines – Philam Life and Bank of the Philippine Islands (BPI). Philam Asset Management, Inc. (PAMI), a wholly owned affiliate of Philam Life, is an asset management company that administers, distributes and provides investment advisory to nine mutual funds namely Philam Managed Income Fund, Philam Bond Fund, PAMI Global Bond Fund, and Philam Dollar Bond Fund, Philam Fund, PAMI Asia Balanced Fund, PAMI Horizon Fund, PAMI Equity Index Fund and Philam Strategic Growth Fund. Philam Life has other affiliate companies such as Philam Call Center,</p>

				Philam Properties Corporation, etc. The Annual Report discloses details of the Philam Life's affiliates, subsidiaries, and joint ventures. Source Documents: 2019 Annual Report, page 52 – Group Chart of Ownership
D.2	Quality of Annual Report			
	Does the company's annual report disclose the following items:			
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>	Y	<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 49 – ENTERPRISE RISK MANAGEMENT</p>
D.2.2	Corporate Objectives		Y	<p>The Philippine American Life and General Insurance (Philam Life) Company is the country's premier and most trusted life insurer for over seven decades now. We focus our knowledge and experience on the Philippines and, as part of the AIA Group, are strengthened by their presence in the Asia-Pacific region.</p> <p>Our vision is to be the Philippines' pre-eminent life insurance provider, driven by our mission of racing against risk to protect every Filipino family and empower them to achieve healthier, longer, better lives.</p> <p>Source Document: 2019 Annual Report, page 6</p>

		CLSA-ACGA (2010) CG Watch 2010 - Appendix 2 (I) CG rules and practices (19) Disclose the exact remuneration of individual directors.		
D.2.3	Financial performance indicators		Y	<p>Philam Life's Financial Highlights and Performance Indicators are disclosed in the Company's 2019 Annual Report.</p> <p>Source Document: 2019 Annual Report, page 11</p>
D.2.4	Non-financial performance indicators		Y	<p>The Company's efforts have been rewarded many times, through recognition from the Philippine government, from the business community here and abroad, from its peers in the industry and through the continuing trust of its policyholders. Among the awards it received were the: Philippines' Best Companies to Work For in Asia 2019 as presented by HR Asia; AIA Philam Life was recognized by the Insurance Commission (IC) and The Institute of Corporate Directors (ICD) as one of the top performing insurance companies in the Philippines under the 2018 ASEAN Corporate Governance Scorecard (ACGS); Philam Foundation's key projects were lauded by the League of Corporate Foundations; AIA Philam Life was ranked first in the Insurance Category for 2019 of the Asset Asian Awards; and, 11 Platinum and four Gold Trusted Brand awards from 2004 to 2019 from Reader's Digest Asia.</p> <p>Source Document: 2019 Annual Report, page 7</p>
D.2.5	Dividend policy		Y	<p>Philam Life adopts AIA's established prudent, sustainable and progressive dividend policy allowing for future growth opportunities and the financial flexibility of the Group within the context of the immediate macroeconomic and capital markets environment. Philam Life also declares and pays 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>The Company declared cash dividend of Thirty Seven Pesos and Twenty One Centavos (P37.21) per share, or a total amount of Seven Billion Four Hundred Twenty Five Million Six Hundred Fifty Two Thousand Five Hundred Sixty Seven Pesos and Ninety One Centavos (P7,425,652,567.91) Philippine Currency payable to all shareholders of the Company in proportion to their holdings as of 01 March 2019.</p> <p>Source Document: 2019 Annual Report, page 34 – DIVIDEND POLICY</p>
D.2.6	Details of whistle-blowing policy		Y	<p>Philam Life's Whistleblow Programme is sufficiently disclosed in the Annual Report. Philam Life does business with integrity and adheres to the highest ethical standards. Any employee (or anyone else) may raise concerns of misconduct or wrongdoing within</p>

			<p>AIA and Philam Life that can allow investigation to fix any problems. This Policy guides all employees on how to raise ethical concerns and managers on how they should respond when this happens.</p> <p>The Whistleblow Program applies to all employees within the AIA Group. ‘Whistleblower’ refers to someone (an AIA employee, business partner, agent, consultant, vendor, customer or other party) who informs AIA or Philam Life of suspected illegal or improper ways of doing business involving violation of laws, regulations, policies, and other unethical actions that might negatively impact AIA’s and Philam Life’s reputation.</p> <p>Employees who are aware of possible wrongdoing within AIA and Philam Life have a responsibility to disclose information to management. Reports are taken seriously and investigated confidentially. Employees or other individuals will not suffer retaliation for reporting suspected wrongdoing in good faith.</p> <p>Any employee (or anyone else) may also raise concerns of misconduct or wrongdoing within AIA and Philam Life through multiple means provided in the AIA Code of Conduct. The report may also be made by using the AIA Group Ethics and Compliance Hotline (PLDT) 1010-5511-00-00-245-4179 or 105-1-800-245-4179.</p> <p>Source Document: 2019 Annual Report, pages 42 to 43 – OPERATING PHILOSOPHY, 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 Philam Life’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:</p> <ul style="list-style-type: none"> ▪ 2019 Annual Report, pages 35 to 39 – Board of Directors Profile ▪ 2019 Annual Report, page 52 – List of Stockholders
D.2.8	Training and/or continuing education programme attended by each director/commissioner	Y	<p>Please see Corporate Governance Section (Seminars Attended) in the Annual Report.</p> <p>Source Document: 2019 Annual Report, page 32 – 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 Philam Life met nine (9) times, as properly disclosed in the Annual Report of the Company. The following are the dates of the Board of Directors’ meetings:</p> <p>22-Jan-19 (Regular) 04-Feb-19 (Special) 01-Mar-19 20-May-19 10 April 2019 (Outgoing) 10 April 2019 (Organizational) 17-Jul-19 02-Oct-19 18-Nov-19</p>

				<p>Source Document: 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>Eight (1) of the directors has 100% attendance while Mr. Aquino has 88.89% attendance, for an overall attendance rate of 98.77%.</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 particular item was disclosed in the 2019 Annual Report of the Company.</p> <p>Source Document: 2019 Annual Report, page 33 - 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 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>	Y	<p>The 2019 Annual Report contains a statement confirming Philam Life's full compliance with the Code of Corporate Governance in page 28.</p> <p>Philam Life confirms its full compliance with the Code of Corporate Governance, and its commitment to the highest standards of corporate governance is rooted in the belief that 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>Source Document: 2019 Annual Report, page 30 – CORPORATE GOVERNANCE, Maintaining Our Commitment to Integrity and Transparency</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.		
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?	OECD Principle V: Disclosure and Transparency (A) Disclosure should include, but not limited to, material information on: (5) Related party transactions ICGN 2.11.1 Related party transactions The company should disclose details of all material related party transactions in its Annual Report.	Y	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 Philam Life. 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. The RPT Policy and Approval Process is sufficiently disclosed in the Annual Report. Source Documents: 2019 Annual Report, Page 50. Related Party Transactions Policy
D.3.2	Does the company disclose the name of the related party and relationship for each material/significant RPT?		Y	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. Source Document: 2019 Annual Report, pages 58 to 61 – RELATED PARTY TRANSACTION
D.3.3	Does the company disclose the nature and value for each material/significant RPT?		Y	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.

				Source Document: <ul style="list-style-type: none"> ▪ 2019 Annual Report, pages 58 to 61 – RELATED PARTY TRANSACTION ▪ RPT Reports submitted to regulator
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>Not Applicable Item as per Insurance Commission Guidelines on Compliance with ACGS (Circular Letter No. 2015-23) dated 8 May 2015.</p> <p>No disclosure required since Philam Life does not trade its shares.</p> <p>Under the Prevention of Insider Trading and Market Misconduct Policy, Directors and certain officers and employees are subject to pre-approval requirements for dealing in AIA Securities.</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>Philam Life has engaged the audit services of Isla Lipana & Co. for 2019 with an Audit Fee of PHP7,773,771.00.</p> <p>Source Document:</p> <ul style="list-style-type: none"> ▪ 2019 Annual Report. Page 50, Engagement External Auditors ▪ PWC Corp Governance Certification 2019
	<i>Where the same audit firm is engaged for both audit and non-audit services</i>	<p>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.</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>		
D.5.2	Are the non-audit fees disclosed?		Y	<p>Philam Life has not engaged Isla Lipana & Co. for non-audit services. No non-audit fees to be disclosed.</p> <p>Source Document:</p> <ul style="list-style-type: none"> ▪ 2019 Annual Report. Page 50, Engaging External Auditors ▪ PWC Corp Governance Certification 2019

D.5.3	Does the non-audit fee exceed the audit fees?		N	<p>Since Philam Life has not engaged its External Auditors, Isla Lipana & Co./PricewaterhouseCoopers, for non-audited services only, the non-audit fee does not exceed the audit fees.</p> <p>Source Document:</p> <ul style="list-style-type: none"> ▪ 2019 Annual Report. Page 50. Engaging External Auditors ▪ PWC Corp Governance Certification 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>	<p>Y</p> <p>To regularly update the general public and stakeholders on the developments and activities of the Company, Philam Life 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>For communication with the agents, a Central Beaming System (CBS) plays various video materials in agency offices all over the country. Aside from this, social media-based chat groups were created for ease of sharing information and announcement.</p> <p>Source Document: Company Website, Press Releases (https://www.philamlife.com/en/about-philamlife/media-centre/press-releases.html)</p>	
D.6.2	Company website		Y	<p>Philam Life regularly updates and uses its company website as a tool for Philam Life to communicate with its stakeholders and customers. News, media materials, claim guide information, product information and financial tools are shared through the Philam Life corporate website.</p> <p>Source Document: Company Website: www.philamlife.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). Philam Life 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>AIA Philam Life uses various channels to communicate its messages to the public, predominantly via social media and through media briefings/press conferences, press releases, and advertorials.</p> <p>Media events are held regularly to publicly announce important company developments. In</p>

				<p>2019, a total of seven media briefings were held. These include:</p> <ol style="list-style-type: none"> 1. Q1 Media Round Table 2. Alcantara Artwork Turnover 3. ALPHA Registry Media Round Table 4. ACP 100 Lifestyle Media Launch 5. IronMan Media Lunch Briefing 6. Live Better Expo with Lifestyle and Business Media 7. Digitalization Media Round Table <p>14 press releases were released throughout the year, and supplemented with 21 advertorials on various news and initiatives of the company.</p> <p>Source Document:</p> <ul style="list-style-type: none"> ▪ Company Website: https://www.philamlife.com/en/about-philamlife/media-centre/press-releases.html ▪ 2019 Annual Report
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 Philam Life was approved by the Stockholders on 16 April 2020, and submitted/released to the regulators on 24 April 2020.</p> <p>Source Documents:</p> <ul style="list-style-type: none"> ▪ Minutes of the Annual Stockholders Meeting held on 16 April 2020, page 4 ▪ Email Acknowledgement of SEC dated 24 April 2020
D.7.2	Is the annual report released within 120 days from the financial year end?		Y	<p>The 2019 Annual Report of Philam Life was approved and released during the Board of Directors and Annual Stockholders' meetings on 16 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 16 April 2020 Annual Stockholders Meeting ▪ Company Website - Minutes of the 16 April 2020 Annual Stockholders Meeting
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	<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>

				Source Document: 2019 Annual Report, page 49 – AUDIT & RELATED PARTY TRANSACTIONS COMMITTEE
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	OECD Principle V (A) OECD Principle V (E) ICGN 7.1 Transparent and open communication ICGN 7.2 Timely disclosure	Y	Philam Life's website discloses among others information relating to business operations of the Company in the Individual and Business Section. It also regularly uploads the Company's Annual Report in its website. Source Documents: <ul style="list-style-type: none"> ▪ Website ▪ 2019 Annual Report
D.8.2	Financial statements/reports (current and prior years)		Y	Philam Life's website discloses among others information relating to the financial statements of the Company for 2019 and prior years. Source Document: Company Website: http://www.philamlife.com – Published Synopsis
D.8.3	Materials provided in briefings to analysts and media		Y	Philam Life'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. Source Document: Company Website: www.philamlife.com
D.8.4	Shareholding structure		Y	The Company's shareholding structure is indicated in the 2018 Annual Report, which is disclosed in the Company Website. Source Document: <ul style="list-style-type: none"> ▪ Website ▪ 2019 Annual Report, page 52 – STOCKHOLDER INFORMATION, List of Stockholders
D.8.5	Group corporate structure		Y	The Corporate Structure, Management, and Affiliates are disclosed in the Website, and likewise indicated in the 2019 Annual Report, which is likewise disclosed in the Company Website Source Document: Company Website – 2019 Annual Report
D.8.6	Downloadable annual report		Y	Philam Life'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 Philam Life's website. Source Document: Company website: www.philamlife.com – Corporate Governance Section, Annual Report
D.8.7	Notice of AGM and/or EGM		Y	Not Applicable Item as per Insurance Commission Guidelines on Compliance with ACGS (Circular Letter No. 2015-23) dated 8 May 2015. Philam Life's website discloses the Notice of the Annual Stockholders' Meeting of the Company on

				<p>10 April 2019 in the Corporate Governance Section.</p> <p>Source Document: Company Website: www.philamlife.com – Corporate Governance Section, 2019 Notice of Annual Stockholders Meeting</p>
D.8.8	Minutes of AGM and/or EGM		Y	<p>Not Applicable Item as per Insurance Commission Guidelines on Compliance with ACGS (Circular Letter No. 2015-23) dated 8 May 2015.</p> <p>Philam Life's website discloses the Minutes of the Annual Stockholders' Meeting of the Company last 10 April 2019 in the Corporate Governance Section.</p> <p>Source Document: Company Website: www.philamlife.com – Corporate Governance Section, Minutes of the Annual Stockholders Meeting dated 10 April 2019</p>
D.8.9	Company's constitution (company's by-laws, memorandum and articles of association)		Y	<p>Philam Life'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.philamlife.com – Corporate Governance Section, Articles of Incorporation ▪ Company Website: www.philamlife.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. 2015-23) dated 8 May 2015.</p> <p>Since Philam Life is not a publicly-listed company, it has no contact details required herein. However, Philam Life 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, Philam Life 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>