

COMPANY NAME : THE PHILIPPINE AMERICAN LIFE AND GENERAL INSURANCE (PHILAM LIFE) COMPANY  
 COMPANY STRUCTURE : CLASS 2  
 FINANCIAL YEAR END : 2017  
 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?	N/A	<p>Not Applicable Item as per Insurance Commission Guidelines on Compliance with ACGS (Circular Letter No. 2015-13).</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. The SEC General Information Sheet also contains the list of shareholders of the Company and their corresponding holdings.</p> <p>Source Documents:</p> <ul style="list-style-type: none"> <li>▪ <a href="#">2017 Annual Report, page 53 - List of Stockholders</a></li> <li>▪ 2017 General Information Sheet, pages 4-5</li> </ul>
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. 2015-13).</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. The SEC General Information Sheet also contains the list of shareholders of the Company and their corresponding holdings.</p> <p>Source Documents:</p> <ul style="list-style-type: none"> <li>▪ <a href="#">2017 Annual Report, page 53 - List of Stockholders</a></li> <li>▪ 2017 General Information Sheet, pages 4-5</li> </ul>

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. 2015-13). The SEC General Information Sheet contains the list of directors of the Company and their corresponding holdings.</p> <p>Source Documents:</p> <ul style="list-style-type: none"> <li>▪ <a href="#">2017 Annual Report, page 53 - List of Stockholders</a></li> <li>▪ 2017 General Information Sheet, pages 4 to 5</li> </ul>
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. 2015-13). The SEC General Information Sheet contains the list of senior management of the Company (i.e. President and Executive Vice Presidents) and their corresponding holdings to the Company.</p> <p>Source Documents:</p> <ul style="list-style-type: none"> <li>▪ <a href="#">2017 Annual Report, page 53 - List of Stockholders</a></li> <li>▪ 2017 General Information Sheet, pages 4 to 5</li> </ul>
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. 2015-13).</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, Philam Properties Corporation, etc. The Annual Report discloses details of the Philam Life's affiliates, subsidiaries, and joint ventures.</p> <p>Source Documents:</p> <ul style="list-style-type: none"> <li>▪ <a href="#">2017 Annual Report, page 53 - Group Chart of Ownership</a></li> <li>▪ 2017 General Information Sheet, page 1</li> </ul>

D.2	Quality of Annual Report		
	<i>Does the company's annual report disclose the following items:</i>		
D.2.1	Key risks	Y	<p>The Annual Report discloses Philam Life's identified key risks. Philam Life follows a Risk Management Framework (RMF) which identifies, quantifies, and mitigates risks within the Company. Sound risk management hinges on effective quantification of risk. On a regular basis, the Company's Risk and Control Assessment Process identifies and assesses its financial and operational risks. Management considers possible or actual risk events, ascribes likelihood of occurrence and potential severity, and then agrees on mitigation strategies to reduce the risks. These strategies are then monitored and the exercise being repeated, with the results stored in an operational risk database.</p> <p>The Company manages its financial risk by periodically running specific scenario-modelling exercises. Financial risk is subdivided into credit risk, market risk, and liquidity risk. The Company's operational risk, on the other hand, is broken down into 13 key operational risks (KORs): business interruption risk; distribution risk; finance and actuarial process risk; fraud and financial crimes risk; information security risk; information technology risk; investment process risk; legal and regulatory risk; operations process risk; people risk; products management risk; project risk; and third party risk. Each KOR is measured using key risk indicators (KRI), with a first line owner for respective KORs. Risk incidents are also being reported whether it be a potential, actual, or near-miss event. Management makes sure that incidents are being escalated in order to determine the root cause and apply proper mitigation. The Risk Working Committee reviews these risks regularly including emerging risks and risk incidents.</p> <p>Source Document:  <a href="#">2017 Annual Report, pages 49 to 50 - ENTERPRISE RISK MANAGEMENT</a></p>
D.2.2	Corporate Objectives	Y	<p>It is Philam Life's vision to be the undisputed leader in life insurance and wealth management, driven by its mission of empowering Filipinos to achieve financial security and prosperity. It is our aim to bring a Philam Life policy in every Filipino household. 2017 saw a host of milestones for Philam Life as we ventured into our</p>

			<p>70<sup>th</sup> year with a refreshed focus; to empower Filipinos to live healthier, longer, and better lives. Pivoting to this director, we were able to transform ourselves and reinforce our position as the foremost creator and innovator in the insurance industry today. We continue to be stronger than ever as reflected in our steady growth and market leading performance for the past year.</p> <p>Source Document:  <a href="#">2017 Annual Report, page 6</a></p>
D.2.3	Financial performance indicators	Y	<p>Philam Life continued to deliver positive results with its Gross premiums reaching PHP19.9 billion, a robust 12% growth over last year. Variable Universal Life (VUL) business continues to soar high at P13.1 Billion, 14% higher versus last year, while the VUL renewals for the Regular Pay Premiums reached a 43% record growth at PHP7.3 Billion. Meanwhile, Philam Life continue to remain strong with its Total Invested Assets at PHP249 Billion, while its Investment Income net of investment expenses amounted to PHP12.0 Billion 10% up from last year's P149 Billion was our Net Insurance Benefits, which came in at PHP16.4 Billion Our shareholder's Equity Balance remained strong at PHP78.6 Billion, higher than last year's PHP722 Billion. While our key metrics remained positive, we ended the year with a Net Income which was at PHP6.1 Billion.</p> <p>Source Document:  <a href="#">2017 Annual Report, page 11</a></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 I's Premier League Cup and Champion's League Cup in 2013; 11 Platinum Trusted Brand Awards; and 2017 Excellence in Education Award by LOMA for exemplary performance in training insurance professionals. Philam Life's Annual Performance Report discloses the Company's non-financial indicators and other achievements.</p> <p>Source Document:  <a href="#">2017 Annual Report, page 7</a></p>

D.2.5	Dividend policy	Y	<p>It is the policy of Philam Life to adopt and comply with the provision of the Insurance Code (RA 10607) that states that no domestic insurance corporation shall declare or distribute any dividend on its outstanding stocks unless it has met the minimum paid-up capital and net worth requirements under the Code and except from profits attested in a sworn statement to the Commissioner by the President or Treasurer of the Company to be remaining on hand after retaining unimpaired the entire paid-up capital stock, the solvency requirements, the legal reserve fund required by the Code, the sum sufficient to pay all net losses reported, or in the course of settlement, and all liabilities for expenses and taxes. Any dividend declared or distributed by the Company shall be reported to the Commissioner within thirty (30) days after such declaration or distribution. As provided in the Company's By-Laws, Article VII, Section 1, dividends shall be declared only from surplus profits and shall be payable at such time and in such amounts as the Board of Directors shall determine; provided, however, that no stock dividend shall be issued without the approval of the stockholders representing not less than two-thirds of all stock then outstanding entitled to vote at a general meeting of the corporation or at a special meeting called for the purpose. No dividend shall be declared that will impair the capital of the corporation. For 2017, The Board, upon recommendation of Management, unanimously agreed not to declare any cash or stock dividends. Philam Life's Dividend Policy is properly disclosed in the Annual Report.</p> <p>Source Document:  <a href="#">2017 Annual Report, page 37 - DIVIDEND POLICY</a></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 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. The goal of the Whistleblow Policy is to support an effective governance process, help maintain and establish corporate values that support ethical and legal behaviour and provide the Whistleblower protection from retaliation for making a report in good faith. It guides all employees on how to raise ethical concerns and managers on how they should respond when this happens. Employees who are aware of possible wrongdoing within Philam Life have a responsibility to disclose that information to management. Reports are taken seriously and investigated confidentially. This Policy is</p>

			<p>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. 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:  <a href="#">2017 Annual Report, pages 48 to 49 - OPERATING PHILOSOPHY, The Whistleblow Program</a></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:  2017 Annual Report:</p> <ul style="list-style-type: none"> <li>▪ <a href="#">pages 39 to 42 - Board of Directors Profile</a></li> <li>▪ <a href="#">page 53 - List of Stockholders</a></li> </ul>
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, Philam Life 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. Philam Life 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. In fact, Mr. Francis G. Estrada, one of the independent directors of the Company, is the</p>

			<p>Chairman of the Board of ICD, and he has attended various round-table discussions, trainings and seminars undertaken by said institution. Mr. Antonino Aquino and Ms. Doris Magsaysay-Ho also attended several trainings in 2017.</p> <p>Source Document: 2017 Annual Report:</p> <ul style="list-style-type: none"> <li>▪ <a href="#">page 36 to 37 - ORIENTATION PROGRAMME AND TRAINING</a></li> <li>▪ <a href="#">page 41 - Profile of Mr. Antonino Aquino</a></li> <li>▪ <a href="#">page 42 - Profile of Ms. Doris Magsaysay-Ho</a></li> </ul>
D.2.9	Number of board of directors/commissioners meetings held during the year	Y	<p>In 2017, the Board of Directors of Philam Life met seven (7) times, as properly disclosed in the Annual Report of the Company. The following are the dates of the Board of Directors' meetings:</p> <p>23 January 2017 11 April 2017 26 April 2017 (Outgoing BOD) 26 April 2017 (Organizational BOD) 25 May 2017 29 June 2017 10 October 2017</p> <p>Source Document: <a href="#">2017 Annual Report, page 36 - Meetings held and attended for the year 2017</a></p>
D.2.10	Attendance details of each director/commissioner in respect of meetings held	Y	<p>The attendance details of the each director are disclosed in the 2017 Annual Report.</p> <p>The following directors attended all seven (7) meetings of the Board, for an attendance rate of 100%:</p> <ol style="list-style-type: none"> <li>1. Antonino T. Aquino;</li> <li>2. Ariel G. Cantos;</li> <li>3. Francis G. Estrada; and</li> <li>4. Joaquin E. Quintos IV</li> </ol>

			<p>Mr. Gordon Watson attended only four (4) meetings (100%) since he resigned effective 01 June 2017.</p> <p>Mr. Jacky Chan attended two (2) meetings (100%) since he was only elected on 01 June 2017.</p> <p>Mr. Paul Lloyd, who was only elected on 29 June 2017 attended one (1) meeting (100%).</p> <p>Ms. Doris Magsaysay-Ho attended six (6) of the seven meetings (85.7%) while Mr. Surendra Menon only attended three (3) meetings (60%) since he resigned effective 01 June 2017.</p> <p>Source Document:  <a href="#">2017 Annual Report, page 36 - Meetings held and attended for the year 2017</a></p>
D.2.11	Details of remuneration of each member of the board of directors/commissioners	N	The particular item was not disclosed in the Annual Performance Report of the Company.
	<i>Corporate Governance Confirmation Statement</i>		
D.2.12	Does the Annual Report contain a statement confirming the company's full compliance with the code of corporate governance and where there is non-compliance, identify and explain reasons for each such issue?	Y	<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>The 2017 Annual Report contains a statement confirming Philam Life's full compliance with the Code of Corporate Governance in page 32.</p> <p>Source Document:  <a href="#">2017 Annual Report, page 35 - CORPORATE GOVERNANCE, Maintaining Our Commitment to Integrity and Transparency</a></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?	Y	<p>Philam Life abides by its policy that ensures all transactions between related parties are only undertaken on an arm's length basis for the financial, commercial, and economic benefit of the Company and the entire group where it belongs. It is the responsibility of the Board of Directors and Management to exercise appropriate oversight and implement effective control systems for managing RPT exposures. The Board shall have the overall responsibility in ensuring that related party transactions are handled in sound and prudent manner, with integrity, and in compliance with applicable laws, rules, regulations, and circulars to ultimately protect the interest of the employees, policyholders, creditors and all other stakeholders.</p> <p>Related party relationship exists and details of Related Party Transactions are provided in Note 29 of the 2017 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 Documents:</p> <ul style="list-style-type: none"> <li>▪ <a href="#">2017 Annual Report, pages 58 to 63 - RELATED PARTY TRANSACTION</a></li> <li>▪ <a href="#">Minutes of the Annual Meeting of the Stockholders dated 24 April 2018, page 7</a></li> <li>▪ <a href="#">RPT Report submitted to regulators</a></li> </ul>
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 29 of the 2017 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> <p><a href="#">2017 Annual Report, pages 58 to 63 - RELATED PARTY TRANSACTION</a></p>
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 29 of the 2017 Audited Financial Statement. The Company has no RPTs that can be classified</p>

			<p>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"> <li>▪ <a href="#">2017 Annual Report, pages 58 to 63 - RELATED PARTY TRANSACTION</a></li> <li>▪ <a href="#">RPT Report submitted to regulators</a></li> </ul>
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?	N/A	<p>Not Applicable Item as per Insurance Commission Guidelines on Compliance with ACGS (Circular Letter No. 2015-13). 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?	Y	<p>Philam Life engages its External Auditors, Isla Lipana &amp; Co./PricewaterhouseCoopers, for audited services only.</p> <p>Source Document:</p> <p><a href="#">Certification</a></p>
	<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?	Y	<p>Not applicable since Philam Life engages its External Auditors, Isla Lipana &amp; Co./PricewaterhouseCoopers, for audit services only. Thus, there was no non-audit fees paid and disclosed in the Annual Report.</p> <p>Source Document:</p> <ul style="list-style-type: none"> <li>▪ <a href="#">2017 Annual Report, page 51 - ENGAGEMENT WITH THE EXTERNAL AUDITORS</a></li> <li>▪ <a href="#">Certification</a></li> </ul>

D.5.3	Does the non-audit fee exceed the audit fees?	N	<p>Since Philam Life engages its External Auditors, Isla Lipana &amp; Co./PricewaterhouseCoopers, for audited services only, this question is Not Applicable. Note that there was no non-audit fees paid and disclosed in the Annual Report.</p> <p>Source Document:  <a href="#">Certification</a></p>
D.6	Medium of communications		
	<i>Does the company use the following modes of communication?</i>		
D.6.1	Quarterly reporting	Y	<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>In 2017, a total of 16 press releases were sent to the media which generated a total of 131 media pick-ups in national print, TV and online.</p> <p>Source Documents:</p> <ul style="list-style-type: none"> <li>▪ Company Website: <a href="http://www.philamlife.com">www.philamlife.com</a></li> <li>▪ <a href="#">2017 Annual Report</a></li> </ul>

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: <a href="http://www.philamlife.com">www.philamlife.com</a></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. 2015-13). 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>One of the used and important modes of communication of Philam Life is Media briefings/press conferences.</p> <p>Media round table and briefings are held regularly to publicly announce important company developments. In 2017, a total of 13 media briefings and press conferences were arranged. These include:</p> <ul style="list-style-type: none"> <li>▪ AIA CEO Visit (Jan)</li> <li>▪ OFW BalikBayani Program in Davao (Feb)</li> <li>▪ Chinese New Year (Feb)</li> <li>▪ Genesis Launch (April)</li> <li>▪ Financial Performance Results (May)</li> <li>▪ Life Smart (May)</li> <li>▪ AIA Healthy Living Index (Jun)</li> <li>▪ Philam Vitality (Jun)</li> <li>▪ Future Scholar (Aug)</li> <li>▪ SPARK Launch (Sep)</li> <li>▪ Philam Paaralan Turnover (Sep)</li> <li>▪ Recruitment Launch (Oct)</li> <li>▪ The Music Run (Nov)</li> </ul> <p>Source Document:</p> <ul style="list-style-type: none"> <li>▪ Company Website: <a href="http://www.philamlife.com">www.philamlife.com</a> - Media Centre</li> <li>▪ <a href="#">2017 Annual Report</a></li> </ul>

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?	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 24 April 2018, and submitted/released to the Securities and Exchange Commission and the Bureau of Internal Revenue on 17 April 2018.</p> <p>Source Documents:  <a href="#">Minutes of the Annual Stockholders Meeting, page 4</a></p>
D.7.2	Is the annual report released within 120 days from the financial year end?	Y	<p>The 2017 Annual Report of Philam Life was released during the Board of Directors and Annual Stockholders' meetings on 24 April 2018.</p> <p>Source Document:  <a href="#">Minutes of the Annual Stockholders Meeting, page 4</a></p>
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 2017. 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 2017, 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:  <a href="#">2017 Annual Report, page 50 to 51 - AUDIT COMMITTEE</a></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	Y	<p>Philam Life's website discloses among others information relating to business operations of the Company in the Individual and Business Section.</p> <p>Source Document: Company Website: <a href="http://www.philamlife.com">www.philamlife.com</a></p>
D.8.2	Financial statements/reports (current and prior years)	Y	<p>Philam Life's website discloses among others information relating to the financial statements of the Company for 2017 and prior years.</p> <p>Source Document: Company Website: <a href="http://www.philamlife.com">www.philamlife.com</a> - Published Synopsis</p>
D.8.3	Materials provided in briefings to analysts and media	Y	<p>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.</p> <p>Source Document: Company Website: <a href="http://www.philamlife.com">www.philamlife.com</a></p>
D.8.4	Shareholding structure	Y	<p>The Company's shareholding structure is indicated in the 2016 Annual Report, which is disclosed in the Company Website.</p> <p>Source Document: <a href="#">2017 Annual Report, page 53 - STOCKHOLDER INFORMATION, List of Stockholders</a></p>
D.8.5	Group corporate structure	Y	<p>The Group's Corporate Structure is indicated in the 2017 Annual Report, which is disclosed in the Company Website.</p> <p>Source Document: <a href="#">2017 Annual Report, page 53 - STOCKHOLDER INFORMATION, Philam Group Chart of Ownership</a></p>
D.8.6	Downloadable annual report	Y	<p>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.</p>

			<p>Source Document: Company website: <a href="http://www.philamlife.com">www.philamlife.com</a> - Corporate Governance Section, Annual Report</p>
D.8.7	Notice of AGM and/or EGM	Y	<p>Not Applicable Item as per Insurance Commission Guidelines on Compliance with ACGS (Circular Letter No. 2015-13). Philam Life's website discloses the Notice of the Annual Stockholders' Meeting of the Company on 26 April 2017 in the Corporate Governance Section.</p> <p>Source Document: Company Website: <a href="http://www.philamlife.com">www.philamlife.com</a> - Corporate Governance Section, 2017 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. 2015-13).</p> <p>Philam Life's website discloses the Minutes of the Annual Stockholders' Meeting of the Company last 24 April 2018 in the Corporate Governance Section.</p> <p>Source Document: Company Website: <a href="http://www.philamlife.com">www.philamlife.com</a> - Corporate Governance Section, Minutes of the Annual Stockholders Meeting dated 24 April 2017</p>
D.8.9	Company's constitution (company's by-laws, memorandum and articles of association)	Y	<p>Not Applicable Item as per Insurance Commission Guidelines on Compliance with ACGS (Circular Letter No. 2015-13).</p> <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"> <li>▪ Company Website: <a href="http://www.philamlife.com">www.philamlife.com</a> - Corporate Governance Section, Articles of Incorporation</li> <li>▪ Company Website: <a href="http://www.philamlife.com">www.philamlife.com</a> - Corporate Governance Section, By-Laws</li> </ul>

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?	Y	Not Applicable Item as per Insurance Commission Guidelines on Compliance with ACGS (Circular Letter No. 2015-13). 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.