

		OECD Principle	Yes / No	Reference/Source Document	Links
D Disclosure and Transparency					
D.1 Transparent ownership structure					
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.	N/A		
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.	N/A		
D.1.3	Does the company disclose the direct and indirect (deemed) shareholdings of directors (commissioners)?		N/A		
D.1.4	Does the company disclose the direct and indirect (deemed) shareholdings of senior management?		N/A		
D.1.5	Does the company disclose details of the subsidiaries, associates, joint ventures and		Y	AXA website	https://www.axa.com.ph
D.2 Quality of Annual Report					
D.2.1	Does the company's annual report disclose the following items: Key risks	OECD Principle V (A): (1) The financial and operating results of the company; (2) Company objectives, including ethics, environment, and other public policy commitments;	Y	AXA website - Fact Sheet	https://www.axa.com.ph/fund-prices
D.2.2	Corporate objectives	(3) Major share ownership and voting rights, including group structures, intra-group relations, ownership data, and beneficial ownership;	Y	AXA website - Fact Sheet	https://www.axa.com.ph/fund-prices
D.2.3	Financial performance indicators	(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;	Y	AXA website - Fact Sheet	https://www.axa.com.ph/fund-prices
D.2.4	Non-financial performance indicators	(6) Foreseeable risk factors, including risk management system;	Y		
D.2.5	Dividend policy	(7) Issues regarding employees and other stakeholders;	N		
D.2.6	Details of whistle-blowing policy	(8) Governance structure and policies, in particular, the content of any corporate governance code or policy and the process by which it is implemented.	Y	AXA website - Fact Sheet	
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	• Bio-datas of AXA's directors are submitted to the Insurance Commission.	
D.2.8	Training and/or continuing education programme attended by each director/commissioner		Y	• All trainings and seminars of the directors are disclosed in their respective Bio-datas, which are submitted to the Insurance Commission.	
D.2.9	Number of board of directors/commissioners meetings held during the year		Y	Corporate Governance Manual	https://new-axa-prod.s3.amazonaws.com/axa-com-ph%2F7f15d964-04a4-4dd6-b630-8efe541646b7_xfvg2wcm9c.pdf
D.2.10	Attendance details of each director/commissioner in respect of meetings held		Y	Corporate Governance Manual (Appendix 1)	https://new-axa-prod.s3.amazonaws.com/axa-com-ph%2F7f15d964-04a4-4dd6-b630-8efe541646b7_xfvg2wcm9c.pdf
D Disclosure and Transparency					
D.2.11	Details of remuneration of each member of the board of directors/commissioners	ICGN 2.4.1 Skills and experience ICGN 2.4.3 Independence ICGN 5.0 Remuneration ICGN 5.4 Transparency UK Corporate Governance Code (2010) A.1.2 - the number of meetings of the board and those committees and individual attendance by directors. CLSA-ACGA (2010) CG Watch 2010 - Appendix 2 (1) CG rules and practices (19) Disclose the exact remuneration of	Y	• There is currently no requirement to disclose this information. However, remuneration of each member of the Board is approved and recorded in the Minutes of the Annual Stockholders Meeting	
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	OECD PRINCIPLE V (A) (8) 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	Y	• Corporate Governance Manual (Appendix 3)	
D Disclosure and Transparency					
D.3.1	Does the company disclose its policy covering the	OECD Principle V: Disclosure and Transparency	Y	• Corporate Governance Manual (Appendix I, page 5)	https://new-axa-prod.s3.amazonaws.com/axa-com-ph%2F7f15d964-04a4-4dd6-b630-8efe541646b7_xfvg2wcm9c.pdf

		OECD Principle	Yes / No	Reference/Source Document	Links
D Disclosure and Transparency					
D 3.2	Does the company disclose the name of the related party and relationship for each material/significant	(A) Disclosure should include, but not limited to, material information on:	Y	• By-Laws • Corporate Governance Manual (Appendix I)	https://new-axa-prod.s3.amazonaws.com/axa-com-ph%2F7f15d964-04a4-4dd6-b630-8efe541646b7_xfvg2wcm9c.pdf
D 3.3	Does the company disclose the nature and value for each material/significant RPT?	(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	• By-Laws • Corporate Governance Manual (Appendix I)	https://new-axa-prod.s3.amazonaws.com/axa-com-ph%2F7f15d964-04a4-4dd6-b630-8efe541646b7_xfvg2wcm9c.pdf
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?	OECD Principle V (A): (3) Major share ownership and voting rights ICGN 3.5 Employee share dealing Companies should have clear rules regarding any trading by directors and employees in the company's own securities. 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	N/A		
D.5 External auditor and Auditor Report					
D.5.1	Are audit fees disclosed?	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.	N/A		
	Where the same audit firm is engaged for both audit and non-audit services				
D.5.2	Are the non-audit fees disclosed?	OECD Principle V (D):	N/A		
D Disclosure and Transparency					
D.5.3	Does the non-audit fees exceed the audit fees?	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. 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.	N/A		
D.6 Medium of communications					
	Does the company use the following modes of communication?				
D.6.1	Quarterly reporting	OECD Principle V (E): Channels for disseminating information should provide	Y	AXA website	https://www.axa.com.ph
D.6.2	Company website	for equal, timely and cost-efficient access to relevant information by users.	Y	AXA website	https://www.axa.com.ph
D.6.3	Analyst's briefing	ICGN 7.1 Transparent and open communication	N/A		

		OECD Principle	Yes / No	Reference/Source Document	Links	
D Disclosure and Transparency						
D.6.4	Media briefings /press conferences	Every company should aspire to transparent and open communication about its aims, its challenges, its achievements and its failures. ICGN 7.2 Timely disclosure Companies should disclose relevant and material information concerning themselves on a	Y	<ul style="list-style-type: none"> Company website Press releases 	https://www.axa.com.ph	
D.7.1	Are the audited annual financial report / statement	OECD Principle V (C)	Y	<ul style="list-style-type: none"> Audited Financial Statement 	2014 Audited Financial Statement	
D.7.2	Is the annual report released within 120 days from the financial year end?	OECD Principle V (E) OECD Principle V-(A). ICGN 7.2 Timely disclosure ICGN 7.3 Affirmation of financial statements The board of directors and the corporate officers of the	N			
OECD Principle						
Yes / No						
Reference/Source Document						
Links						
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?	company should affirm at least annually the accuracy of the company's financial statements or financial accounts.	Y	<ul style="list-style-type: none"> By-Laws (Article III) Corporate Governance Manual (pages 15, 27) 	https://new-axa-prod.s3.amazonaws.com/axa-com-ph%2F7f15d964-04a4-4dd6-b630-8efe541646b7_xfvg2wcm9c.pdf	
D.8 Company website						
https://new-axa-prod.s3.amazonaws.com/axa-com-ph%2F7f15d964-04a4-4dd6-b630-8efe541646b7_xfvg2wcm9c.pdf						
disclosing up-to-date information on the following:						
D.8.1	Business operations	OECD Principle V (A)	Y	AXA website	https://www.axa.com.ph	
D.8.2	Financial statements/reports (current and prior years)		Y	AXA website	https://www.axa.com.ph	
D.8.3	Materials provided in briefings to analysts and media		Y	AXA website	https://www.axa.com.ph	
D.8.4	Shareholding structure		Y	AXA website	https://www.axa.com.ph	
D.8.5	Group corporate structure		Y	AXA website	https://www.axa.com.ph	
D.8.6	Downloadable annual report		OECD Principle V (E)	N		
D.8.7	Notice of AGM and/or EGM		ICGN 7.1 Transparent and open communication	Y	AXA website	https://www.axa.com.ph
D.8.8	Minutes of AGM and/or EGM		ICGN 7.1 Transparent and open communication	Y	AXA website	https://www.axa.com.ph
D.8.9	Company's constitution (company's by-laws, memorandum and articles of association)	ICGN 7.2 Timely disclosure	Y	AXA website	https://www.axa.com.ph	
D.9 Investor relations						
D.9.1	Does the company disclose the contact details (e.g. telephone, fax, and email) of the officer responsible for investor relations?	ICGN 7.1 Transparent and open communication	N/A			