

		OECD Principle	Yes / No	Reference/Source Document	Links
Level 2	Penalty Items				
A	Rights of shareholders				
A.1	Basic shareholder rights				
A.1.1(P)	Did the company fail or neglect to offer equal treatment for share repurchases to all shareholders?	OECD Principle II (A)	N	Default	
A.2	Shareholders, including institutional shareholders, should be allowed to consult with each other on issues concerning their basic shareholder rights				
A.2.1(P)	Is there evidence of barriers that prevent shareholders from communicating or consulting with other shareholders?	Shareholders, including institutional shareholders, should be allowed to consult with each other on issues concerning their basic shareholder rights as defined in the Principles, subject to exceptions to prevent abuse.	N	There are no such barrier.	
A.3	Right to participate effectively in and vote in general shareholders meeting and should be informed of the rules, including notice				
A.3.1(P)	Did the company include any additional and unannounced agenda item into the notice of AGM/EGM?	OECD Principle II (C) 2	N	• Notice to Annual Stockholders Meeting • Minutes of the Annual Stockholders Meeting	https://new-axa-prod.s3.amazonaws.com/axa-com-ph/52f95da595-a34b-42b7-8d92-912ef82540dd_9etjsejval.pdf
A.4	Capital structures and arrangements that enable certain shareholders to obtain a degree of control				
A.4.1(P)	Shareholders agreement?		N	Company website	https://www.axa.com.ph/
A.4.2(P)	Voting cap?	OECD Principle II (D)	N	Default	
A.4.3(P)	Multiple voting rights?		N	Default	
A.5	Capital structures and arrangements that enable certain shareholders to obtain a degree of control				
		OECD Principle	Yes / No	Reference/Source Document	Links
Level 2	Penalty Items				
A.5.1(P)	Is a pyramid ownership structure and/ or cross holding structure apparent?	OECD Principle II (D) Capital structures and arrangements that enable certain shareholders to obtain a degree of control disproportionate to their equity ownership should be disclosed. Some capital structures allow a shareholder to exercise a degree of control over the corporation disproportionate to the shareholders' equity ownership in the company. Pyramid structures, cross shareholdings and shares with limited or multiple voting rights can be used to diminish the capability of non-controlling shareholders to	N	• General Information Sheet 2014 No pyramid ownership structure and/or cross holding structure exists.	https://new-axa-prod.s3.amazonaws.com/axa-com-ph/52f95dc72b8-3a85-4fb3-804d-19d21df1cea_4aad5c2ouux.pdf
B	Equitable treatment of shareholders				
B.1	Insider trading and abusive self-dealing should be prohibited				
B.1.1(P)	Has there been any conviction of insider trading involving directors/commissioners, management and employees in the past three years?		N	There has been no conviction of insider trading involving AXA's directors, management and/or employees	
B.2	Processing minority shareholders' claims and actions				
B.2.1(P)	the laws, rules and regulations pertaining to significant or material related party transactions in the past three years?		N	There has been no such cases filed against AXA in the past 3 years.	
C	Role of stakeholders				
C.1	The rights of stakeholders that are established by law or through mutual agreements are to be respected				
C.1.1(P)	Have there been any violations of any laws pertaining to labour/employment/ consumer/insolvency/ commercial/competition or environmental issues?		N	No such violation has been filed against AXA.	
C.2	Where stakeholders participate in the corporate governance process, they should have access to				
C.2.1(P)	Has the company faced any sanctions by regulators for failure to make announcements within the requisite time period for material events?		N	No such sanctions by regulators has been imposed against AXA.	
D	Disclosure and transparency				
		OECD Principle	Yes / No	Reference/Source Document	Links
D.1	Sanctions from regulator on financial reports				
D.1.1(P)	Has the company received a "qualified opinion" in its external audit report?		N	No qualified opinion in its external audit report has been received by AXA.	
D.1.2(P)	Has the company received a "disclaimer opinion" in its external audit report?		N	No disclaimer opinion in its external audit report has been received by AXA.	
D.1.3(P)	Has the company received a "qualified opinion" in its external audit report?		N	No qualified opinion in its external audit report has been received by AXA.	
D.1.4(P)	Has the company in the past year revised its financial statements for reasons other than		N	No revision has been made to AXA's financial statements	
E	Responsibilities of the Board				
E.1	Compliance with listing rules, regulations and applicable laws				
E.1.1(P)	Is there any evidence that the company has not complied with any listing rules and regulations over the past year apart from disclosure rules?		N	The regulatory requirement to comply with listing rules and regulations is not applicable since AXA is a privately-held company	
E.1.2(P)	Have there been any instances where non-executive		N	No such instances have occurred.	
E.2	Board Appraisal				
E2.1(P)	Does the Company have any independent directors/commissioners who have served for more than nine years or two terms (whichever is higher) in the same capacity?		N	There is currently no requirement in law or in regulation as to the term limit of independent directors in insurance companies.	
E2.2(P)	Did the company fail to identify who are the independent director(s)/commissioner(s)?		N	No. Identity of the independent directors are sufficiently disclose.	
E.3	External Audit				
E.3.1(P)	Is any of the directors or senior management a former employee of the auditor?		N	There is no director or senior management who is a former	
E.4	Board Structure and Composition				
		OECD Principle	Yes / No	Reference/Source Document	Links
Level 2	Penalty Items				
E.4.1(P)	company in the past 2 years?		N		