D	Disclosure and Transparency	Source Document/ Location of Information	Yes / No	Point
D.1	Transparent ownership structure			
D.1.1	Does the information on shareholdings reveal the identity of beneficial owners, holding 5% shareholding or more?	General Information Sheet	Υ	1
D.1.2	Does the company disclose the direct and indirect (deemed) shareholdings of major and/or substantial shareholders?	General Information Sheet	Υ	1
D.1.3	Does the company disclose the direct and indirect (deemed) shareholdings of directors (commissioners)?	General Information Sheet	Y	1
D.1.4	Does the company disclose the direct and indirect (deemed) shareholdings of senior management?	General Information Sheet	Υ	1
D.1.5	Does the company disclose details of the subsidiaries, associates, joint ventures and special purpose enterprises/vehicles (SPEs)/ (SPVs)?	Not Applicable	N	1

D.2	Quality of Annual Report			
	Does the company's annual report disclose the following items:			
D.2.1	Key risks	Financial Statements & Independent Auditor's Report	Υ	1
D.2.2	Corporate objectives	Financial Statements & Independent Auditor's Report; Employee Handbook	Υ	1
D.2.3	Financial performance indicators	Financial Statements & Independent Auditor's Report	Υ	1
D.2.4	Non-financial performance indicators	Financial Statements & Independent Auditor's Report	Υ	1
D.2.5	Dividend policy	Financial Statements & Independent Auditor's Report	Υ	1
D.2.6	Details of whistle-blowing policy			0
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			0
D.2.8	Training and/or continuing education programme attended by each director/commissioner			0
D.2.9	Number of board of directors/commissioners meetings held during the year			0
D.2.10	Attendance details of each director/commissioner in respect of meetings held			0

		Source Document/ Location of Information	Yes / No	Point
D	Disclosure and Transparency			
D.2.11	Details of remuneration of the CEO and each member of the board of directors/commissioners			0
	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?	Financial Statements & Independent Auditor's Report	Υ	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?	Financial Statements & Independent Auditor's Report	Υ	1
D.3.2	Does the company disclose the name of the related party and relationship for each material/significant RPT?	Financial Statements & Independent Auditor's Report	Υ	1
D.3.3	Does the company disclose the nature and value for each material/significant RPT?	Financial Statements & Independent Auditor's Report	Υ	1
	'		•	<u> </u>
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?	The Company is not publicly listed hence this provision is not applicable.	N	1
	·			
D.5	External Auditor and Auditor Report			
D.5.1	Are audit fees disclosed?			0
	Where the same audit firm is engaged for both audit and non-audit services,			
D.5.2	Are the non-audit fees disclosed?			0
D.5.3	Does the non-audit fees exceed the audit fees?			0
D.6	Medium of communications			
	Does the company use the following modes of communication?			

		Source Document/ Location of Information	Yes / No	Point
D	Disclosure and Transparency			
D.6.1	Quarterly reporting			0
D.6.2	Company website	www. libertyinsurance.com.ph	Υ	1
D.6.3	Analyst's briefing			0
D.6.4	Media briefings /press conferences			0

D.7	Timely filing/release of annual/financial reports			
D.7.1	Is the audited annual financial report released within 120 days from the financial year end?	Minutes of Regular Board Meeting	Υ	1
D.7.2	Is the audited annual financial report released within 90 days from the financial year end?			0
D.7.3	Is the audited annual/financial report released within 60 days from the financial year end?			0
D.7.4	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?	Minutes of Regular Board Meeting	Υ	1

		Source Document/ Location of Information	Yes / No	Point
D	Disclosure and Transparency			
D.8	Company website			
	Does the company have a website disclosing up-to-date information on the following:			
D.8.1	Business operations	www.libertyinsurance.com.ph	Y	1
D.8.2	Financial statements/reports (current and prior years)	www.libertyinsurance.com.ph	Y	1
D.8.3	Materials provided in briefings to analysts and media	www.libertyinsurance.com.ph	Y	1
D.8.4	Shareholding structure	www.libertyinsurance.com.ph	Υ	1
D.8.5	Group corporate structure	www.libertyinsurance.com.ph	Υ	1
D.8.6	Downloadable annual report	www.libertyinsurance.com.ph	Υ	1
D.8.7	Notice of AGM and/or EGM	www.libertyinsurance.com.ph	Y	1
D.8.8	Company's constitution (company's by-laws, memorandum and articles of association)	www.libertyinsurance.com.ph	Y	1
D.8.9	All of the above (D.8.1 to D.8.8) are available in English	www.libertyinsurance.com.ph	Y	1

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?		0