

Company Name Caritas Life
 Financial year end 2019
 Sector Insurance
 Company Structure Class 1

		Yes / No	Reference / Source Documents
A	Rights of Shareholders		
A.1	Basic Shareholder Rights		
A.1.1	Does the company pay (interim and final/annual) dividends in an equitable and timely manner; that is, <u>all shareholders are treated equally and paid within 30 days after being (i) declared for interim dividends and (ii) approved by annual general meeting (AGM) for final dividends?</u>	N/A	
A.2	Right to participate in decisions concerning fundamental corporate changes.		
	Do shareholders have the right to participate in:		
A.2.1	Amendments to the company's constitution?	Y	default
A.2.2	The authorisation of additional shares?	Y	default
A.2.3	The transfer of all or substantially all assets, which in effect results in the sale of the company?	Y	default
A.3	Right to participate effectively in and vote in general shareholder meetings and should be informed of the rules, including voting procedures, that govern general shareholder meetings.		
A.3.1	Do shareholders have the opportunity, evidenced by an agenda item, to approve remuneration (fees, allowances, benefit-in-kind and other emoluments) or any increases in remuneration for the <u>non-executive directors/commissioners?</u>	Y	default
A.3.2	Does the company provide non-controlling shareholders a right to nominate candidates for board of directors/commissioners?	N/A	
A.3.3	Does the company allow shareholders to elect directors/commissioners individually?	Y	By-laws (Article II)
A.3.4	Does the company disclose the voting and vote tabulation procedures used, <u>declaring both before the meeting proceeds?</u>	N/A	
A.3.5	Do the minutes of the most recent AGM record that there was an opportunity allowing for shareholders to ask questions or raise issues?	N/A	
A.3.6	Do the minutes of the most recent AGM record questions and answers?	N/A	
A.3.7	Does the disclosure of the outcome of the most recent AGM include resolution(s)?	Y	AGM Minutes 2019
A.3.8	Does the company disclose the voting results including approving, dissenting, and abstaining votes for each agenda item for the most recent AGM?	Y	AGM Minutes 2019
A.3.9	Does the company disclose the list of board members who attended the most recent AGM?	Y	AGM Minutes 2019
A.3.10	Did the chairman of the board of directors/commissioners attend the most recent AGM?	Y	AGM Minutes 2019
A.3.11	Did the CEO/Managing Director/President attend the most recent AGM?	Y	AGM Minutes 2019
A.3.12	Did the chairman of the Audit Committee attend the most recent AGM?	Y	AGM Minutes 2019
A.3.13	Did the company organise their most recent AGM in an easy to reach location?	Y	AGM Minutes 2019
A.3.14	<u>Does the company allow for voting in absentia?</u>	Y	default
A.3.15	Did the company vote by poll (as opposed to by show of hands) for all resolutions at the most recent AGM?	N/A	
A.3.16	Does the company disclose that it has appointed an independent party (scrutineers/inspectors) to count and/or validate the votes at the AGM?	N/A	
A.3.17	Does the company make publicly available by the next working day the result of the votes taken during the most recent AGM for all resolutions?	N/A	
A.3.18	Do companies provide at least 21 days notice for all resolutions?	N	
A.3.19	Does the company provide the rationale and explanation for each agenda item which require shareholders' approval in the notice of AGM/circulars and/or the accompanying statement?	Y	
A.4	Markets for corporate control should be allowed to function in an efficient and transparent manner.		
A.4.1	In cases of mergers, acquisitions and/or takeovers, does the board of	N/A	
A.5	The exercise of ownership rights by all shareholders, including institutional investors, should be facilitated.		
A.5.1	Does the Company publicly disclose policy/practice to encourage shareholders including institutional shareholders to attend the general meetings or engagement with the Company?	N/A	

Company Name Caritas Life
Sector Insurance
Company Structure Class 1

		Yes / No	Reference / Source Documents
B	Equitable Treatment of Shareholders		
B.1	Shares and voting rights		
B.1.1	Do the company's ordinary or common shares have one vote for one share?	Y	default
B.1.2	Where the company has more than one class of shares, does the company publicise the voting rights attached to each class of shares (e.g. through the company website / reports/the stock exchange/ the regulator's website)?	Y	default
B.2	Notice of AGM		
B.2.1	Does each resolution in the most recent AGM deal with only one item, i.e., there is no bundling of several items into the same resolution?	Y	AGM Minutes 2019
B.2.2	Are the company's notice of the most recent AGM/circulars fully translated into English and published on the same date as the local-language version?	Y	Notice of the AGM Meeting
	Does the notice of AGM/circulars have the following details:		
B.2.3	Are the profiles of directors/commissioners (at least age, qualification, date of first appointment, experience, and directorships in other listed companies) in seeking election/re-election included?	N	
B.2.4	Are the auditors seeking appointment/re-appointment clearly identified?	Y	AGM Minutes 2019
B.2.5	Has an explanation of the dividend policy been provided?	N/A	
B.2.6	Is the amount payable for final dividends disclosed?	N/A	
B.2.7	Documents required to be proxy/ Were the proxy documents made easily available?	N/A	
B.3	Insider trading and abusive self-dealing should be prohibited.		
B.3.1	Does the company have policies and/or rules prohibiting directors/commissioners and employees to benefit from knowledge which is not generally available to the market?	Y	default
B.3.2	Are the directors and commissioners required to report their dealings in company shares within 3 business days?	N/A	
B.4	Related party transactions by directors and key executives.		
B.4.1	Are directors and commissioners required to disclose their interest in transactions and any other conflicts of interest?	Y	default
B.4.2	Does the company have a policy requiring a committee of independent directors/commissioners to review material/significant RPTs to determine whether they are in the best interests of the company?	Y	RPT Policy
B.4.3	Does the company have a policy requiring board members (directors/commissioners) to abstain from participating in the board discussion on a particular agenda when they are conflicted?	Y	default
B.4.4	Does the company have policies on loans to directors and commissioners either forbidding this practice or ensuring that they are being conducted at arm's length basis and at market rates.	Y	default
B.5	Protecting minority shareholders from abusive actions		
B.5.1	Were there any RPTs that can be classified as financial assistance to entities other than wholly-owned subsidiary companies?	Y	RPT Policy
B.5.2	Does the company disclose that RPTs are conducted in such a way to ensure that they are fair and at arms' length?	Y	RPT Policy

Philippines

Company Name

Sector Insurance
Company Structure Class 1

		Yes / No	Reference / Source Document
C	Role of Stakeholders		
C.1	The rights of stakeholders that are established by law or through mutual agreements are to be respected.		
	Does the company disclose a policy that :		
C.1.1	Stipulates the existence and scope of the company's efforts to address customers' health and safety?	N	
C.1.2	Explains supplier/contractor selection practice?	N	
C.1.3	Describes the company's efforts to ensure that its value chain is environmentally friendly or is consistent with promoting sustainable development?	N	
C.1.4	Elaborates the company's efforts to interact with the communities in which they operate?	N	
C.1.5	Directs the company's anti-corruption programmes and procedures?	N	
C.1.6	Describes how creditors' rights are safeguarded?	Y	AFS
	Does the company disclose the activities that it has undertaken to implement the above mentioned policies?		
C.1.7	Customer health and safety	N	
C.1.8	Supplier/Contractor selection and criteria	N	
C.1.9	Environmentally-friendly value chain	N	
C.1.10	Interaction with the communities	N	
C.1.11	Anti-corruption programmes and procedures	N	
C.1.12	Creditors' rights	Y	AFS
C.1.13	Does the company have a separate corporate responsibility (CR) report/section or sustainability report/section?	N	
C.2	Where stakeholder interests are protected by law, stakeholders should have the opportunity to obtain effective redress for violation of their rights.		
C.2.1	Does the company provide contact details via the company's website or Annual Report which stakeholders (e.g. customers, suppliers, general public etc.) can use to voice their concerns and/or complaints for possible violation of their rights?	Y	Please see Contact details via Website
C.3	Performance-enhancing mechanisms for employee participation should be permitted to develop.		
C.3.1	Does the company explicitly disclose the health, safety, and welfare policy for its employees?	N	
C.3.2	Does the company publish data relating to health, safety and welfare of its employees?	N	
C.3.3	Does the company have training and development programmes for its employees?	Y	Certificates of Attendance
C.3.4	Does the company publish data on training and development programmes for its employees?	N	
C.3.5	Does the company have a reward/compensation policy that accounts for the performance of the company beyond short-term financial measures?	N	
C.4	Stakeholders including individual employee and their representative bodies, should be able to freely communicate their concerns about illegal or unethical practices to the board and their rights should not be compromised for doing this.		
C.4.1	Does the company have procedures for complaints by employees concerning illegal (including corruption) and unethical behaviour?	Y	Whistle blower Policy
C.4.2	Does the company have a policy or procedures to protect an employee/person who reveals illegal/unethical behavior from retaliation?	Y	Whistle blower Policy

Company Name Caritas Life
Sector Insurance
Company Structure Class 1

		Yes / No	Reference / Source Document
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?	Y	GIS 2019
D.1.2	Does the company disclose the direct and indirect (deemed) shareholdings of major and/or substantial shareholders?	Y	
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 special purpose enterprises/ vehicles (SPES)/ (SPVs)?	Y	GIS 2019
D.2	Quality of Annual Report		
	Does the company's annual report disclose the following items:		
D.2.1	Key risks	Y	AFS
D.2.2	Corporate objectives	Y	AFS
D.2.3	Financial performance indicators	Y	AFS
D.2.4	Non-financial performance indicators	Y	AFS
D.2.5	Dividend policy	Y	AFS
D.2.6	Details of whistle-blowing policy	Y	Whistle blower Policy
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	
D.2.8	Training and/or continuing education programme attended by each director/commissioner	Y	Certificates of Attendance
D.2.9	Number of board of directors/commissioners meetings held during the year	Y	Attendance Report
D.2.10	Attendance details of each director/commissioner in respect of meetings held	Y	Attendance Report
D.2.11	Details of remuneration of the CEO and each member of the board of directors/commissioners	N	
	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?	N	
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	RPT Policy
D.3.2	Does the company disclose the name of the related party and relationship for each material/significant RPT?	Y	AFS
D.3.3	Does the company disclose the nature and value for each material/significant RPT?	Y	AFS
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	
D.5	External auditor and Auditor Report		
D.5.1	Are audit fees disclosed?	N	
	Where the same audit firm is engaged for both audit and non-audit services,		
D.5.2	Are the non-audit fees disclosed?	N/A	
D.5.3	Does the non-audit fees exceed the audit fees?	N/A	
D.6	Medium of communications		
	Does the company use the following modes of communication?		
D.6.1	Quarterly reporting	Y	Quarterly reports submitted to IC
D.6.2	Company website	Y	Website
D.6.3	Analyst's briefing	N/A	
D.6.4	Media briefings /press conferences	N/A	
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?	Y	
D.7.2	Is the annual report released within 120 days from the financial year end?	Y	
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	
	Does the company have a website disclosing up-to-date information on the following:		
D.8	Company website		
	Does the company have a website disclosing up-to-date information on the following:		
D.8.1	Business operations	Y	IC Approved Synopses
D.8.2	Financial statements/reports (current and prior years)	Y	IC Approved Synopses
D.8.3	Materials provided in briefings to analysts and media	N	
D.8.4	Shareholding structure	Y	GIS 2019
D.8.5	Group corporate structure	N	
D.8.6	Downloadable annual report	N	
D.8.7	Notice of AGM and/or EGM	N	
D.8.8	Minutes of AGM and/or EGM	Y	AGM Minutes 2019

		Yes / No	Reference / Source Document
D	Disclosure and Transparency		
D.8.9	Company's constitution (company's by-laws, memorandum and articles of association)	Y	Website
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?	N/A	

Ownership Structure Wholly-Owned Company
Company Structure Class 1

		Yes / No	Reference / Source Documents
E	Responsibilities of the Board		
E.1	Clearly defined board responsibilities and corporate governance policy		
E.1.1	Does the company disclose its corporate governance policy / board charter?	Y	Corporate Governance Manual
E.1.2	Are the types of decisions requiring board of directors/commissioners' approval disclosed ?	Y	Corporate Governance Manual
E.1.3	Are the roles and responsibilities of the board of directors/commissioners clearly stated?	Y	Corporate Governance Manual
E.1.4	Does the company have a vision and mission statement?	Y	Website
E.1.5	Has the board review the vision and mission/strategy in the last financial year?	Y	Corporate Governance Manual
E.1.6	Does the board of directors monitor/oversee the implementation of the corporate strategy?	Y	Corporate Governance Manual
E.2	Code of ethics or conduct		
E.2.1	Are the details of the code of ethics or conduct disclosed?	Y	Corporate Governance Manual
E.2.2	Does the company disclose that all directors/commissioners, senior management and employees are required to comply with the code?	Y	Corporate Governance Manual
E.2.3	Does the company disclose how it implements and monitors compliance with the code of ethics or conduct?	Y	Corporate Governance Manual
	Board Structure & Composition		
E.2.1	Does the company have a code of ethics or conduct?	N	
E.2.2	Are the details of the code of ethics or conduct disclosed?	N	
E.2.3	Does the company disclose that all directors/commissioners, senior management and employees are required to comply with the code?	N	
E.2.4	Do independent directors/commissioners make up at least 50% of the board of directors/commissioners?	N	
E.2.5	Are the independent directors/commissioners independent of management and major/ substantial shareholders?	Y	GIS 2019
E.2.6	Does the company have a term limit of nine years or less for its independent directors/commissioners?	Y	Corporate Governance Manual
E.2.7	Has the company set a limit of five board seats that an individual independent/non-executive director/commissioner may hold simultaneously?	Y	Corporate Governance Manual
E.2.8	Does the company have any independent directors/commissioners who serve on a total of more than five boards of publicly-listed companies?	N	
E.2.9	Does the company have any executive directors who serve on more than two boards of listed companies outside of the group?	N	
	Nominating Committee		
E.2.10	Does the company have a Nominating Committee (NC)?	Y	GIS 2019
E.2.11	Does the Nominating Committee comprise of a majority of independent directors/commissioners?	N	
E.2.12	Is the chairman of the Nominating Committee an independent director/commissioner?	Y	GIS 2019
E.2.13	Does the company disclose the terms of reference/ governance structure/charter of the Nominating Committee?	N	
E.2.14	Did the Nominating Committee meet at least twice during the year?	Y	
E.2.15	Is the attendance of members at Nominating Committee meetings disclosed?	Y	
	Remuneration Committee / Compensation Committee		
E.2.16	Does the company have a Remuneration Committee?	Y	GIS 2019
E.2.17	Does the Remuneration Committee comprise of a majority of independent directors/commissioners?	N	
E.2.18	Is the chairman of the Remuneration Committee an independent director/commissioner?	N	
E.2.19	Does the company disclose the terms of reference/ governance structure/ charter of the Remuneration Committee?	Y	
E.2.20	Did the Remuneration Committee meet at least twice during the year?	Y	
E.2.21	Is the attendance of members at Remuneration Committee meetings disclosed?	Y	
	Audit Committee		
E.2.22	Does the company have an Audit Committee?	Y	default
E.2.23	Does the Audit Committee comprise entirely of non-executive directors/commissioners with a majority of independent directors/commissioners?	Y	GIS 2019
E.2.24	Is the chairman of the Audit Committee an independent director/commissioner?	Y	default
E.2.25	Does the company disclose the terms of reference/governance structure/charter of the Audit Committee?	Y	
E.2.26	Does the Annual Report disclose the profile or qualifications of the Audit Committee members?	N/A	
E.2.27	Does at least one of the independent directors/commissioners of the committee have accounting expertise (accounting qualification or experience)?	Y	
E.2.28	Did the Audit Committee meet at least four times during the year?	N	
E.2.29	Is the attendance of members at Audit Committee meetings disclosed?	Y	
E.2.30	Does the Audit Committee have primary responsibility for recommendation on the appointment, and removal of the external auditor?	Y	Corporate Governance Manual

		Yes / No	Reference / Source Documents
E	Responsibilities of the Board		
E.3	Board Processes		
E.3.1	Are the board of directors meeting scheduled before the start of financial year?	N	
E.3.2	Does the board of directors/commissioners meet at least six times during the year?	Y	Attendance Report
E.3.3	Has each of the directors/commissioners attended at least 75% of all the board meetings held during the year?	N	
E.3.4	Does the company require a minimum quorum of at least 2/3 for board decisions?	N	
E.3.5	Did the non-executive directors/commissioners of the company meet separately at least once during the year without any executives present?	N	
	Access to information		
E.3.6	Are board papers for board of directors/commissioners meetings provided to the board at least five business days in advance of the board meeting?	N	
E.3.7	Does the company secretary play a significant role in supporting the board in discharging its responsibilities?	Y	Corporate Governance Manual
E.3.8	Is the company secretary trained in legal, accountancy or company secretarial practices?	Y	Corporate Governance Manual
	Board Appointments and Re-Election		
E.3.9	Does the company disclose the criteria used in selecting new directors/commissioners?	Y	Corporate Governance Manual
E.3.10	Does the company disclose the process followed in appointing new directors/commissioners?	Y	
E.3.11	Are all the directors/commissioners subject to re-election at least once every three years?	Y	default
E.3.12	Does the company disclose its remuneration (fees, allowances, benefit-in-kind and other emoluments) policy/practices (i.e. the use of short term and long term incentives and performance measures) for its executive directors and CEO?	N	
E.3.13	Is there disclosure of the fee structure for non-executive directors/commissioners?	N	
E.3.14	Do the shareholders or the Board of Directors approve the remuneration of the executive directors and/or the senior executives?	Y	default
E.3.15	Do independent non-executive directors/commissioners receive options, performance shares or bonuses?	N	
	Internal Audit		
E.3.16	Does the company have a separate internal audit function?	Y	default
E.3.17	Is the head of internal audit identified or, if outsourced, is the name of the external firm disclosed?	Y	AGM Minutes
E.3.18	Does the appointment and removal of the internal auditor require the approval of the Audit Committee?	Y	default
	Risk Oversight		
E.3.19	Does the company disclose the internal control procedures/risk management systems it has in place?	N	
E.3.20	Does the Annual Report disclose that the board of directors/commissioners has conducted a review of the company's material controls (including operational, financial and compliance controls) and risk management systems?	N/A	
E.3.21	Does the company disclose how key risks are managed?	N	
E.3.22	Does the Annual Report contain a statement from the board of directors/commissioners or Audit Committee commenting on the adequacy of the company's internal controls/risk management systems?	N/A	
E.4	People on the Board		
	Board Chairman		
E.4.1	Do different persons assume the roles of chairman and CEO?	Y	GIS 2019
E.4.2	Is the chairman an independent director/commissioner?	N	
E.4.3	Has the chairman been the company CEO in the last three years?	N	
E.4.4	Are the role and responsibilities of the chairman disclosed?	Y	Corporate Governance Manual
	Skills and Competencies		
E.4.5	Does at least one non-executive director/commissioner have prior working experience in the major sector that the company is operating in?	Y	
E.4.6	Does the company disclose a board of directors/commissioners diversity policy?	N	
E.5	Board Performance		
	Directors Development		
E.5.1	Does the company have orientation programmes for new directors/commissioners?	Y	Certificates of Attendance
E.5.2	Does the company have a policy that encourages directors/commissioners to attend on-going or continuous professional education programmes?	Y	Certificates of Attendance
	CEO/Executive Management Appointments and Performance		
E.5.3	Does the company disclose how the board of directors/commissioners plans for the succession of the CEO/Managing Director/President and key management?	N	
E.5.4	Does the board of directors/commissioners conduct an annual performance assessment of the CEO/Managing Director/President?	N	
	Board Appraisal		
E.5.5	Is an annual performance assessment conducted of the board of directors/commissioners?	N	
E.5.6	Does the company disclose the process followed in conducting the board assessment?	N	

		Yes / No	Reference / Source Documents
E	Responsibilities of the Board		
E.5.7	Does the company disclose the criteria used in the board assessment?	N	
	Director Appraisal		
E.5.8	Is an annual performance assessment conducted of individual director/commissioner?	N	
E.5.9	Does the company disclose the process followed in conducting the director/commissioner assessment?	N	
E.5.10	Does the company disclose the criteria used in the director/commissioner assessment?	N	
	Committee Appraisal		
E.5.11	Is an annual performance assessment conducted of the board of directors/commissioners committees?	N	

Company Name Caritas Life
Sector Insurance
Company Structure Class 1

		Yes / No	Reference / Source Document
Level 2	Bonus Items		
A	Rights of shareholders		
A.1	Right to participate effectively in and vote in general shareholders meeting and should be informed of the rules, including voting procedures, that govern general shareholders meeting.		
A.1.1(B)	Does the company allow the use of secure electronic voting in absentia at the general meetings of shareholders?	N/A	
B	Equitable treatment of shareholders		
B.1	Notice of AGM		
B.1.1(B)	Does the company release its notice of AGM (with detailed agendas and explanatory circulars), as announced to the Exchange, at least 28 days before the date of the meeting?	N/A	
D	Disclosure and transparency		
D.1	Quality of Annual Report		
D.1.1(B)	Does the company disclose details of remuneration of the CEO?	N	
E	Responsibilities of the Board		
E.1	Board Competencies and Diversity		
E.1.1(B)	Does the company have at least one female independent director/commissioner?	Y	GIS 2019
E.2	Nominating Committee		
E.2.1(B)	Does the Nominating Committee comprise entirely of independent directors/commissioners?	N	
E.2.2(B)	Does the Nominating Committee undertake the process of identifying the quality of directors aligned with the company's strategic directions?	N	
E.3	Board Appointments and Re-Election		
E.3.2(B)	Does the company use professional search firms or other external sources of candidates (such as director databases set up by director or shareholder bodies) when searching for candidates to the board of directors/commissioners?	N	
E.4	Board Structure & Composition		
E.4.1(B)	Do independent non-executive directors/commissioners make up more than 50% of the board of directors/commissioners?	N	
E.5	Board Performance		
E.5.1(B)	Does the company have a separate level Risk Committee?	N	

Company Name Caritas Life
Sector Insurance
Company Structure Class 1

		Source Document/ Location of Information	Yes / No	Reference / Source Documents
Level 2	Penalty			
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?	Repurchase Notice/announcement, Annual Report	N/A	
A.2	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.			
A.2.1(P)	Is there evidence of barriers that prevent shareholders from communicating or consulting with other shareholders?	Annual Report/Company website.	N	
A.3	Right to participate effectively in and vote in general shareholders meeting and should be informed of the rules, including voting procedures, that govern general shareholders meeting.			
A.3.1(P)	Did the company include any additional and unannounced agenda item into the notice of AGM/EGM?	Minutes of Meeting, Meeting results notice	N	
A.4	Capital structures and arrangements that enable certain shareholders to obtain a degree of control disproportionate to their equity ownership should be disclosed.			
	Did the company fail to disclose the existence of:			
A.4.1(P)	Shareholders agreement?		N	
A.4.2(P)	Voting cap?	Annual Report/Company website/articles of association/Company announcement/Media	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 disproportionate to their equity ownership should be disclosed.			
A.5.1(P)	Is a pyramid ownership structure and/ or cross holding structure apparent?	To check for the existence of pyramid & cross holding structure(s): Disclosure in Annual Report/website of the company. It may be directly reported by the company or it may be disclosed in the form of Group Structure that reveals the ownership of the controlling shareholder(s) in companies belonging to the group. Other sources: Check on ownership structures of chains of entities that directly/indirectly owns the listed company.	N/A	
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?	Annual Report / Company website / announcement / Media	N	
B.2	Protecting minority shareholders from abusive action			
B.2.1(P)	Has there been any cases of non compliance with the laws, rules and regulations pertaining to significant or material related party transactions in the past three years?	Annual Report / Company website / announcement / Media	N	
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)	Has there been any violations of any laws pertaining to labour/employment/ consumer/insolvency/ commercial/competition or environmental issues?	Sanction(s) from Regulator(s)/Media coverage/Company announcement/Annual Report/Company website	N	
C.2	Where stakeholders participate in the corporate governance process, they should have access to relevant, sufficient and reliable information on a timely and regular basis.			
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?	Sanction(s) from Regulator(s)/Media/Company announcement/Annual Report/Company website	N	
D	Disclosure and transparency			
D.1	Sanctions from regulator on financial reports			
D.1.1(P)	Did the company receive a "qualified opinion" in its external audit report?	Annual Report - see Independent Auditor's Report accompanying the company's financial statements.	N	
D.1.2(P)	Did the company receive a "adverse opinion" in its external audit report?	Annual Report - see Independent Auditor's Report accompanying the company's financial statements.	N	
D.1.3(P)	Did the company receive a "disclaimer opinion" in its external audit report?	Annual Report - see Independent Auditor's Report accompanying the company's financial statements.	N	
D.1.4(P)	Has the company in the past year revised its financial statements for reasons other than changes in accounting policies?	Media / announcement	N	
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?	Company announcements to the exchange/Media	N/A	

		Source Document/ Location of Information	Yes / No	Reference / Source Documents
Level 2	Penalty			
E.1.2(P)	Have there been any instances where non-executive directors/commissioner have resigned and raised any issues of governance-related concerns?	Company announcements to the exchange/Media	N	
E.2	Board A			
E2.1(P)	Does the Company have any independent directors/commissioners who have served for more than nine years?	Annual report/Company website	N	GIS 2019
E2.4(P)	Did the company fail to disclose the identity of the independent director(s)/commissioner(s)?	Annual Report	N	GIS 2019
E.3	External Audit			
E.3.1(P)	Is any of the directors or senior management a former employee or partner of the current external auditor (in the past 2 years)?	Annual Report	N	
E.4.1 (P)	Is any of the directors a former CEO of the company in the past 2 years?			