

COMPANY NAME : SUN LIFE GREPA FINANCIAL, INC.  
 COMPANY STRUCTURE : CLASS 2  
 FINANCIAL YEAR END : 2017  
 SECTOR : INSURANCE (Life)

C. Role of Stakeholders			
	SCORECARD ITEM	Y/ N	Reference / Source document
C.1	<b>The rights of stakeholders that are established by law or through mutual agreements are to be respected.</b>		
	<i>Does the company disclose a policy that :</i>		
C.1.1	Stipulates the existence and scope of the company's efforts to address customers' welfare?	<p><b>OECD Principle IV (A):</b>            The rights of stakeholders that are established by law or through mutual agreements are to be respected. In all OECD countries, the rights of stakeholders are established by law (e.g. labour, business, commercial and insolvency laws) or by contractual relations. Even in areas where stakeholder interests are not legislated, many firms make additional commitments to stakeholders, and concern over corporate reputation and corporate performance often requires the recognition of broader interests.</p> <p><b>Global Reporting Initiative: Sustainability Report (C1.1 - C.15) International Accounting Standards</b></p>	<p>YES</p> <p>As a policy, crucial to the very foundation of SLGFI's relationship with its stakeholders i.e., - TRUST, the Company puts its CUSTOMERS (or as we prefer to refer to them- CLIENTS) <b>FIRST</b>. Sun Life takes seriously its commitment to fair dealing, honesty, and integrity in the conduct of its business with its CLIENTS. This is why it has established a Customer Complaints Handling Process because complaints are viewed as integral input to enhancing the Sun Life customer experience, to strengthening customer loyalty, and to improving operational efficiency. Under said process, the interest of the CLIENTS insofar as attending to its complaints or feedback are given importance through the observance of turn-around-time and resolution of their issues.</p> <p>As SLGFI's products and services continue to expand, the Company recognizes that it also has to strengthen its safeguards that cater to the</p>

		<p><b>1: Presentation of Financial Statements</b></p>	<p>protection of its clients. For this, a Privacy Policy that outlines the Company’s policy in relation to the collection, use, and protection of Client Data was developed to provide clients with a wonderful experience. The policy outlines the limits of use of information and means of acquiring client information. Under the policy, client data is also protected with proper safeguards to ensure confidentiality and privacy; prevent loss, theft, or use of unauthorized purposes; and to comply with the requirements of the law.</p> <p>Under the Code of Business Conduct, SLGFI employees, officers and board of directors are required to protect the PERSONAL INFORMATION about Sun Life employees and clients.</p> <p><i>“RESPECTING PRIVACY and CONFIDENTIALITY Respecting our customers’ and employees’ privacy is critical to maintaining our ethical reputation and building strong business relationships. We are all responsible for protecting confidential information – whether about Sun Life or our customers or co-workers – against theft, loss, unauthorized access, disclosure, destruction or misuse.</i></p> <p><i>PERSONAL INFORMATION We accumulate a great deal of information about our customers, employee, and others who develop relationship with us, and have an</i></p>
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			<p><i>obligation to limit the collection, access, use and disclosure of this information as outlined in the Sun Life Global Privacy Commitment and as may be required by local law and local policies.</i></p> <p><i>Specifically, we must collect, use or disclose personal information lawfully and fairly, and disclose it only with the permission of the person to whom it relates unless otherwise permitted or required by law. In certain jurisdictions, our customers have the right to ask if we hold any personal information about them and, if so, to review it. They may also have the right to know how we collected the information, how we use it, and to whom we have disclosed it.</i></p> <p><i>We must respect and maintain the confidentiality of our employees' personal information such as salaries, performance review or disabilities. Do not share this information with anyone unless you need to in order to perform your job.</i></p> <p><i>Access to personal information within Sun Life is generally restricted to those employees who have a legitimate business reason to access it. In some cases, we may communicate or transfer personal information to employees, agents and service providers (even in other countries). In this case, the information may be subject to the laws of those jurisdictions. All of these persons, wherever they are located, must be required to protect the confidentiality of this personal information. "</i></p>
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			<p>The 2017 Sustainability Report also contains and manifests Sun Life’s commitment to serving and protecting its client’s welfare.</p> <p><i>“Our Purpose is helping Clients achieve lifetime financial security and live healthier lives. We work hard to understand Client needs and how we can deliver the best experience at key touch points in each of our markets worldwide by:</i></p> <ol style="list-style-type: none"><li><i>1. <b>Being more proactive in contacting and engaging with our Clients</b> - so that we listen and interact with them more often than we do today.</i></li><li><i>2. <b>Making it easier to do business with us</b> - for example, by simplifying processes and writing documents in clear and plain language.</i></li><li><i>3. <b>Providing better problem resolution</b> – with prompt, Client-minded solutions, when issues arise.”</i></li></ol> <p>Further, we also provided the following information in our Annual Report:</p> <p><b>“Our Vision</b> <i>Sun Life Grepa Financial, Inc. is a provider of financial solutions that are innovative, market responsive and with great value.</i></p> <p><b>Our Mission</b> <i>Our business is to provide solutions.</i></p>
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			<p><i>volunteering sessions were held on June 29 and November 16, 2017, with employees assisting in serving homeless people in Tayuman with free meals and baths offered by the center.</i></p> <p><i>Blood donation activities have also been part of the employee's calendar. The company held a one-day blood donation drive on August 8, 2017. The donations were received by the Philippine General Hospital Hematology-Oncology Department.</i></p> <p><i>The company also supported Sun Life Financial Philippines' SINAG Teachers Conference held on June 6 at the AIM Conference Center. Sun Life Grepa employees gave financial literacy booklets to the attending teachers and also acted as game facilitators during the program's PRAXIS game portion."</i></p> <p><b>Source Documents:</b></p> <p><b><u>Sun Life Grepa Complaints Handling Manual</u></b> <a href="https://www.sunlifegrepa.com/upload/files/Complaints%20Handling%20Manual%20v%205.1-EXCERPT%20ONLY.pdf">https://www.sunlifegrepa.com/upload/files/Complaints%20Handling%20Manual%20v%205.1-EXCERPT%20ONLY.pdf</a></p> <p><b><u>Company Policies/Respecting Privacy and Confidentiality</u></b> <a href="https://www.sunlifegrepa.com/CorporateGovernance.aspx">https://www.sunlifegrepa.com/CorporateGovernance.aspx</a></p> <p><b><u>Online Privacy Statement</u></b></p>
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C.1.2	Explains supplier/contractor selection practice?		YES	<p>Sun Life ensures that its vendors/suppliers undergo a comprehensive accreditation process, which includes assessment of their technical and financial capability, business continuity, safety, health, privacy, AML and environmental policies. Consistent also with the principles the Company espouses on the practice of fair, ethical, and governance policies, it also as far as practicable grants opportunity equitably to all the appropriate suppliers through competitive bidding and auctions.</p> <p>Proposals are evaluated thoroughly and consideration is based on the value-add the</p>

			<p>products or services will provide to the Company. The different policies and practices of the suppliers or vendors are evaluated such as privacy, anti-bribery/corruption, AML, etc.</p> <p><i>“Supplier Accreditation</i></p> <ol style="list-style-type: none"><li><i>1. The Administrative Services Department (ASD) shall continuously search for vendors with the intention of establishing strategic and long-term business relationships.</i></li><li><i>2. The selection of suppliers is the responsibility of Procurement personnel. In making the selection, Procurement will coordinate closely with the requisitioning department/subsidiaries to obtain adequate and reasonable specifications. Procurement should endeavor to place orders with regard to the dependability and service record of the supplier, the nature of the guaranty and warranty, its price and the quality. Preference should be given to the following types of suppliers, providing this involves no sacrifice in quality, service or price:</i><ol style="list-style-type: none"><li><i>2.1 Suppliers who are developing new and improved products and equipment, or designing and developing a special product for the company’s exclusive use, and</i></li><li><i>2.2 Supplier with adequate financial strength who also have a reputation for adhering to specifications and delivery schedules.</i></li></ol></li><li><i>3. Vendors are subject to accreditation based on the following standards: quality of product or service, technical competence, competitive pricing, delivery timeframe and customer service.</i></li></ol>
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			<p>4. <i>There will be two types of accreditation, specific to vendor class:</i></p> <p>4.1 <i>Non-primary – supplier may either be New (with minimal transaction and no established performance history) or Accredited (with frequent transactions but on a short-term basis). Accreditation will focus on establishing legality of business and supplier’s capability to supply/deliver.</i></p> <p>4.2 <i>Primary – Supplier who has demonstrated an excellent performance history and transactions are on a long-term basis. Evaluation will focus on establishing supplier’s capability to sustain excellent performance and support long-term relationship with the company.</i></p> <p>5. <i>The following documents must be submitted for accreditation</i></p> <p>5.1 <i>Non-primary</i></p> <p>5.1.1 <i>Standard Documentation - Supplier Information Sheet, Company Profile, List of Goods and Services, Incorporation Papers (if applicable), Certificate of Registration, Business Permit, List of machinery/Equipment (for printers/ Fabricators), Certificate of Authority to Sell (for resellers/dealers, Exclusive distributors)</i></p> <p>5.2 <i>Primary</i></p> <p>5.2.1 <i>Standard Documentation - Supplier Information Sheet, Company Profile, List of Goods and Services, Incorporation Papers (if applicable), Certificate of Registration, Business Permit, List of machinery/Equipment (for printers/ Fabricators), Certificate of</i></p>
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			<p><b><u>Sun Life Grepa Policy on Supplier Accreditation Performance Evaluation</u></b>  <a href="https://www.sunlifegrepa.com/upload/files/SLGFI%20Policy%20on%20Supplier%20Accreditation%20and%20Performance%20Evaluation.pdf">https://www.sunlifegrepa.com/upload/files/SLGFI%20Policy%20on%20Supplier%20Accreditation%20and%20Performance%20Evaluation.pdf</a></p>
C.1.3	Describes the company's efforts to ensure that its value chain is environmentally friendly or is consistent with promoting sustainable development?		<p>YES</p> <p><i>“Corporate Sustainability</i>  <i>Sun Life Grepa is committed to building sustainable and healthier communities in the country. To ensure that our business can achieve long term success, we use adaptive workplace strategies such as 5S PLUS, our workplace organization philosophy; and The Brighter Way, our Lean Six Sigma-based initiative to enhance individual and company productivity.”</i></p> <p><b><i>“Our Sustainability Strategy</i></b>  <i>Sun Life’s focus on advancing sustainability is a key strategy and differentiator for the Company. In 2014, we began to evolve our sustainability-related programs into a formal, enterprise-wide sustainability strategy, an approach aimed at generating business value, transforming our culture and mitigating risk.</i></p> <p><i>Endorsed by Sun Life’s Board of Directors and overseen by our International Sustainability Council, our sustainability strategy focuses on four principles: organizational resilience, environmental responsibility, community wellness, and governance and risk management. Our sustainability strategy is based on input from external and internal stakeholders and is aligned</i></p>

			<p><i>with our business strategy. Recognizing that sustainability is essential to our overall business success, we continue to embed a sustainability perspective into our culture and across our global operations.</i></p> <p><b><i>Priority topics: Focusing on what matters most</i></b>  <i>Our sustainability reporting is guided by a set of priority topics, based on their current significance to our stakeholders and our businesses. We identify, prioritize and validate these topics through a periodic materiality analysis to ensure we are addressing the right issues. Key steps in our materiality process include:</i></p> <ul style="list-style-type: none"> <li><i>• Listening to and consulting with internal and external stakeholders throughout the year via diverse channels;</i></li> <li><i>• Reviewing industry trends, benchmarks and best practices related to sustainability;</i></li> <li><i>• Considering global reporting frameworks, including the GRI;</i></li> <li><i>• Seeking feedback on our sustainability reporting; and</i></li> <li><i>• Participating in external sustainability organizations and forums.</i></li> </ul> <p><i>In 2017, we completed an analysis of sustainability stakeholder groups to improve our sustainability reporting and to better understand priority topics, interests and information needs. We also conducted consumer research in Canada to understand perceptions of both corporate sustainability in general and Sun Life's</i></p>
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			<p>sustainability efforts. This input reaffirmed our current priority topics as well as the emphasis we place on sustainability at Sun Life as a key business driver. Research highlights include:</p> <ul style="list-style-type: none"> <li>• Corporate sustainability activities are an important part of how consumers form their opinions of businesses.</li> <li>• Activities related to the environment and data security are seen as most relevant for companies to undertake.</li> <li>• Consumers are interested in knowing about our sustainability initiatives that align with our core business, including health and wellness and responsible investing.</li> </ul> <p><b>Mapping our priority topics to Sun Life’s four sustainability principles:</b>  While we have organized each priority topic under one of our sustainability principles, you will find some topics like sustainable investing our broader and speak to more than one theme.</p> <ul style="list-style-type: none"> <li>• <b>Organizational Resilience</b>  We cultivate an organization that is competitive, forward-thinking, resilient and sustainable for the long term, so we can continue to meet the needs of our Clients, who are at the centre of all we do.</li> </ul> <p>Promoting Fairness and Safety in the Workplace  Company Policies  <a href="https://www.sunlifegrepa.com/CorporateGovernance.aspx">https://www.sunlifegrepa.com/CorporateGovernance.aspx</a></p>
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				<p><i>Performance Management and Career Development</i> <a href="https://www.sunlifegrepa.com/upload/files/SLGFI%20Performance%20Management%20Career%20Development.pdf">https://www.sunlifegrepa.com/upload/files/SLGFI%20Performance%20Management%20Career%20Development.pdf</a></p> <p><i>Employee Benefit and Services</i> <a href="https://www.sunlifegrepa.com/upload/files/SLGFI%20Employee%20Benefit%20Services.pdf">https://www.sunlifegrepa.com/upload/files/SLGFI%20Employee%20Benefit%20Services.pdf</a></p> <ul style="list-style-type: none"><li>• <i>Environmental Responsibility</i> <i>We are accountable for the impact of our operations on the environment, so we're taking even more steps to measure, manage and reduce that impact.</i></li><li>• <i>Community Wellness</i> <i>We believe that by actively supporting the communities in which we live and work, we can help to build a positive environment for our Clients, employees, advisors and shareholders.</i></li><li>• <i>Governance and Risk Management</i> <i>We believe a well-run organization contributes to a stable operating platform for the Company, and positions us to meet our obligations to stakeholders. Proactive risk management and an embedded risk</i></li></ul>
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				<p><i>culture are essential to our long-term success.”</i></p> <p><b><u>Sun Life Grepa Leadership Team (Pages 16-17)</u></b>  <b><u>Board of Directors (Pages 10-14)</u></b>  <b><u>Board Appointed Officers (Pages 18-19)</u></b>  <a href="https://www.sunlifegrepa.com/upload/files/SLGFI%202017%20Corporate%20Annual%20Report.pdf">https://www.sunlifegrepa.com/upload/files/SLGFI%202017%20Corporate%20Annual%20Report.pdf</a></p> <p>The consolidated Report of Sun Life and the efforts in the Philippines are included in the 2017 Sustainability Report.</p> <p><b>Source Document:</b></p> <p><b><u>2017 Sustainability Report</u></b>  <a href="https://www.sunlifegrepa.com/upload/files/Sustainability_Report_E2017.pdf">https://www.sunlifegrepa.com/upload/files/Sustainability_Report_E2017.pdf</a></p>
C.1.4	Elaborates the company's efforts to interact with the communities in which they operate?		YES	<p>SLGFI operates in a socially-responsible way across the organization and seeks continuous innovative solutions to make better for its stakeholders including the community where it belongs.</p> <p><i>“ Sun Life Grepa Financial, Inc. (Sun Life Grepa), one of the top life insurance companies in the country, raises overall employee engagement with “Share the Passion”, its corporate social responsibility (CSR) program.</i></p> <p><i>In coordination with AY Foundation, the corporate social responsibility arm of the</i></p>

			<p><i>Yuchengco Group of Companies, Sun Life Grepa employees volunteered to serve at the Arnold Janssen Kalinga Center in Tayuman, Manila. The volunteering sessions were held on June 29 and November 16, 2017, with employees assisting in serving homeless people in Tayuman with free meals and baths offered by the center.</i></p> <p><i>Blood donation activities have also been part of the employee's calendar. The company held a one-day blood donation drive on August 8, 2017. The donations were received by the Philippine General Hospital Hematology-Oncology Department.</i></p> <p><i>The company also supported Sun Life Financial Philippines' SINAG Teachers Conference held on June 6 at the AIM Conference Center. Sun Life Grepa employees gave financial literacy booklets to the attending teachers and also acted as game facilitators during the program's PRAXIS game portion."</i></p> <p>SLGFI also acts through its affiliate - Sun Life Foundation for corporate social responsibility projects or activities. The Company's community-related efforts are based on its sustainability commitment. As SLGFI's business continues to grow, it continues to contribute to nation-building and shareholder value through its engaged and empowered workforce, financial literacy advocacy embedded in the products and</p>
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			<p>services offered to its CLIENTS and the public in general.</p> <p>The Company actively supports the communities it is based as well as its branches and works by helping build a positive and healthy environment for our CLIENTS, employees, advisors and shareholders.</p> <p>Our approach includes helping Filipinos improve their financial literacy, giving back to communities across the nation, strategically investing in real estate and infrastructure that is friendly to the environment (LEED-certified building) and such other activities that foster healthy, sustainable communities, advocating for public policies that encourage financial security and healthy lifestyles.</p> <p><b>Source Documents:</b></p> <p><b><u>2017 Sustainability Report (Page 36- 38)</u></b> <a href="https://www.sunlifegrepa.com/upload/files/Sustainability_Report_E2017.pdf">https://www.sunlifegrepa.com/upload/files/Sustainability_Report_E2017.pdf</a></p> <p><b><u>2017 Annual Report/ Corporate Social Responsibility (Page 44-45)</u></b> <a href="https://www.sunlifegrepa.com/upload/files/SunLife%202017%20Corporate%20Annual%20Report.pdf">https://www.sunlifegrepa.com/upload/files/SunLife%202017%20Corporate%20Annual%20Report.pdf</a></p>
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C.1.5	Describe the company's anti-corruption programmes and procedures?		YES	<p>SLGFI is committed to complying with the letter and spirit of anti-corruption and anti-bribery laws in the Philippines and in any country where it operates. We prohibit the direct or indirect use of bribery, kickbacks, payoffs, or other corrupt practices by employees, agents, or other parties acting on behalf of SLGFI, especially in our business relationships including those with suppliers, customers and government representatives.</p> <p>Generally, anti-corruption laws in the country where SLGFI operates prohibits companies from giving or offering anything of value to a government official or another person to improperly influence a decision, assist the company in doing business, or obtain an improper business advantage. Hence, it is a policy of SLGFI not to allow payments or transfers of anything of value to government officials or representatives unless it is for a legitimate or legal purpose and duly and with prior review and authorization.</p> <p>Employees are expected to recognize and avoid the use of bribery and to report suspected and known incidents of bribery and corruption through the channels set out in the Company's Code of Business Conduct. SLGFI's business partners are also expected to conduct themselves lawfully and ethically, and to comply with applicable anti-bribery and anti-corruption laws.</p>
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			<p>SLGFI also has a gifts and entertainment policy, which disallows employees to receive and give gifts or entertainment unless it is within the allowable amount and meets the conditions set under the policy.</p> <p><b>Source Documents:</b></p> <p><b><u>Company Policies: Rejecting Corruption and Bribery</u></b> <b><u>Company Polices: Accepting and Giving Gifts and Entertainment</u></b> <a href="https://www.sunlifegrepa.com/CorporateGovernance.aspx">https://www.sunlifegrepa.com/CorporateGovernance.aspx</a></p> <p><b><u>Code of Business Conduct: Rejecting Corruption and Bribery (Page 13)</u></b> <b><u>Code of Business Conduct: Accepting and Giving Gifts and Entertainment (Page 14)</u></b> <a href="https://www.sunlifegrepa.com/upload/files/Code%20of%20Business%20Conduct.pdf">https://www.sunlifegrepa.com/upload/files/Code%20of%20Business%20Conduct.pdf</a></p>
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C.1.6	Describes how creditors' rights are safeguarded?		<p>SLGFI periodically or when requested/required reports to its creditors its financial condition through the published Audited Financial Statements, and other Certifications issued by any of its duly authorized officers. The provision of the Annual Report or Audited Financial Report ensures the Creditors of the Company's financial soundness.</p> <p>SLGFI also submits to the Securities and Exchange Commission and the Insurance Commission its audited Financial Statements and Annual Statement. As these become public documents once submitted to the regulators, the creditors of the company are also given access to these reports to apprise them of the Financial Condition or status of the Company thereby safeguarding their rights as creditors.</p> <p>The Company also provides prompt and accurate reports of its financial standing to its creditors. It is the policy of SLGFI to protect the rights of its creditors by maintaining, at all times, the company's good credit standing. In furtherance thereof, the Company strictly observes contractual obligations, and regard fair and truthful disclosure and transparency of financial records and dealings of utmost importance to assure creditors of the company's continued credit worthiness.</p> <p>Moreover, the Company's risk based approach to business and adoption of good corporate governance practices further assures the</p>
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			<p>creditors that the company is effectively managing its risks and is committed to sustaining the growth of the company. As part of the implementation, SLGFI regularly submits its periodic financial reports to the Insurance Commission and SEC.</p> <p>SLGFI abides by Sun Life’s Code of Business Conduct, which requires the provision of accurate, consistent, informative and timely disclosures of information to the market.</p> <p><b><i>“Maintaining Books and Records</i></b>  <i>Sun Life is required to maintain accurate, reliable and complete records to appropriately manage its affairs and comply with legal, regulatory, financial, accounting and operational obligations. Sun Life must provide accurate, consistent, informative and timely disclosures of information to the market in accordance with applicable laws.</i></p> <p><i>Our financial statements, books and records should accurately reflect all business transactions and be retained in accordance with our record keeping practices. Failing to disclose or record revenues, expenses, assets or liabilities is prohibited.</i></p> <p><i>We are responsible for the integrity of books and business, financial accounting and expense records under our control. xxx”</i></p>
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				<p>Source Documents:</p> <p><b><u>2017 Annual Report/ Audited Financial Statement (Page 35-42)</u></b>  <a href="https://www.sunlifegrepa.com/upload/files/SLGFI%202017%20Corporate%20Annual%20Report.pdf">https://www.sunlifegrepa.com/upload/files/SLGFI%202017%20Corporate%20Annual%20Report.pdf</a></p> <p><b><u>2017 Audited Financial Statement</u></b>  <a href="https://www.sunlifegrepa.com/upload/files/SLGFI%202017%20Audited%20Financial%20Statement%20with%20notes%20SEC%20160614.pdf">https://www.sunlifegrepa.com/upload/files/SLGFI%202017%20Audited%20Financial%20Statement%20with%20notes%20SEC%20160614.pdf</a></p> <p><b><u>SLGFI Website/Company Policies/Rights of Creditors</u></b>  <a href="http://www.sunlifegrepa.com/CorporateGovernance.aspx">http://www.sunlifegrepa.com/CorporateGovernance.aspx</a></p>
	<b><i>Does the company disclose the activities that it has undertaken to implement the above mentioned policies?</i></b>			
C.1.7	Customer health and safety	<b>OECD Principle IV (A) &amp; Global Reporting Initiative</b>	YES	<p><b>The following are the activities of Sun Life worldwide:</b></p> <p><b>Community wellness</b></p> <p>As a company with many connections to communities around the world, Sun Life believes that we play a role in their development and sustainability. Sun Life's goal is to build sustainable, healthier communities where we all</p>

			<p>live and work, helping to improve the lives of individuals and families.</p> <p><b>“Getting active to raise awareness</b></p> <ul style="list-style-type: none"> <li>• <i>Established the Sun Life Resolution Run event encouraging people to be more active in Hong Kong and Malaysia. It will expand to the Philippines, Indonesia and Vietnam in 2018.</i></li> <li>• <i>Hosted the Sun Life Cycle PH event in Bonifacio Global City in Taguig, which included ride categories for children and adults.</i></li> <li>• <i>Hosted the Sun Life Jakarta Diabetes Walk in Indonesia, to encourage the public, our Clients and our employees to adopt healthier lifestyles.</i></li> </ul> <p><b>Philippines foundation marks 10<sup>th</sup> year with active living projects</b></p> <p><i>Launched new projects through the Sun Life Foundation in the Philippines to improve health, wellness and education in disadvantaged communities. For example, to create a safe space for people to get fit and stay healthy, the Foundation is creating a linear park with a lighted pathway in Marikina City to benefit 19,000 households in the area.</i></p> <p><b>GoWell</b></p> <p>Through its website <a href="http://www.gowell.com.ph">www.gowell.com.ph</a>, Sun Life offers clients, employees and other Filipinos fitness and wellness content for the body, mind</p>
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			<p>and soul, and provides access to community workouts such as Zumba, cycling classes and yoga. To further inspire Filipinos in their wellness journey, GoWell has tapped celebrity ambassadors who excel in their respective crafts to lead the community.</p> <p>GoWell members receive the following privileges:</p> <ul style="list-style-type: none"> <li>• Access to fitness and wellness content</li> <li>• Perks and privileges from our partner establishments</li> <li>• Entry into GoWell events</li> <li>• Opportunity to meet other health and wellness enthusiasts in the community</li> </ul> <p><b>Source Documents:</b></p> <p><b><u>2017 Sustainability Report/ Community Wellness (Pages 35-38)</u></b>  <a href="https://www.sunlifegrepa.com/upload/files/Sustainability_Report_E2017.pdf">https://www.sunlifegrepa.com/upload/files/Sustainability_Report_E2017.pdf</a></p> <p><b>GoWell website [www.gowell.com.ph]</b></p>
C.1.8	Supplier/Contractor selection and criteria		<p>YES</p> <p>Sun Life ensures that its vendors/suppliers undergo a comprehensive accreditation process, which includes assessment of their technical and financial capability, business continuity, safety, health, privacy, AML and environmental policies. Consistent also with the principles the Company espouses on the</p>



			<p>practice of fair, ethical, and governance policies, it also as far as practicable grants opportunity equitably to all the appropriate suppliers through competitive bidding and auctions.</p> <p>Proposals are evaluated thoroughly and consideration is based on the value-add the products or services will provide to the Company. The different policies and practices of the suppliers or vendors are evaluated such as privacy, anti-bribery/corruption, AML, etc.</p> <p><i>“Supplier Accreditation</i></p> <p><i>1. The Administrative Services Department (ASD) shall continuously search for vendors with the intention of establishing strategic and long-term business relationships.</i></p> <p><i>2. The selection of suppliers is the responsibility of Procurement personnel. In making the selection, Procurement will coordinate closely with the requisitioning department/subsidiaries to obtain adequate and reasonable specifications. Procurement should endeavor to place orders with regard to the dependability and service record of the supplier, the nature of the guaranty and warranty, its price and the quality. Preference should be given to the following types of suppliers, providing this involves no sacrifice in quality, service or price:</i></p> <p><i>2.1 Suppliers who are developing new and improved products and equipment, or designing and developing a special product for the company’s exclusive use, and</i></p>
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				<p><i>2.2 Supplier with adequate financial strength who also have a reputation for adhering to specifications and delivery schedules.</i></p> <p><i>3. Vendors are subject to accreditation based on the following standards: quality of product or service, technical competence, competitive pricing, delivery timeframe and customer service.</i></p> <p><i>4. There will be two types of accreditation, specific to vendor class:</i></p> <p><i>4.1 Non-primary – supplier may either be New (with minimal transaction and no established performance history) or Accredited (with frequent transactions but on a short-term basis). Accreditation will focus on establishing legality of business and supplier’s capability to supply/deliver.</i></p> <p><i>4.2 Primary – Supplier who has demonstrated an excellent performance history and transactions are on a long-term basis. Evaluation will focus on establishing supplier’s capability to sustain excellent performance and support long-term relationship with the company.</i></p> <p><i>5. The following documents must be submitted for accreditation</i></p> <p><i>5.1 Non-primary</i></p> <p><i>5.1.1 Standard Documentation - Supplier Information Sheet, Company Profile, List of Goods and Services, Incorporation Papers (if applicable), Certificate of Registration, Business Permit, List of machinery/Equipment (for printers/ Fabricators), Certificate of Authority to Sell (for resellers/dealers, Exclusive distributors)</i></p>
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				<p><i>5.2 Primary</i></p> <p><i>5.2.1 Standard Documentation - Supplier Information Sheet, Company Profile, List of Goods and Services, Incorporation Papers (if applicable), Certificate of Registration, Business Permit, List of machinery/Equipment (for printers/ Fabricators), Certificate of Authority to Sell (for resellers/dealers, Exclusive distributors)</i></p> <p><i>5.2.2 Additional document requirement, whichever is applicable –Latest 2 years Audited Financial Statement, Certificate of Technical competence, Endorsement/Support Letter from Principal/ Manufacturer, Quality Certification (e.g. ISO).</i></p> <p><i>5.2.3 Company Analysis - includes Performance Evaluation, Plant Facility Inspection and Trade references investigation (suppliers and/or customers). This requirement is to be performed by ASD Procurement.</i></p> <p><i>6. Exceptions to vendor accreditation are limited to the following:</i></p> <p><i>6.1 Emergency Purchase – acquisition requiring immediate delivery in which the time frame is shorter than the prescribed lead-time.</i></p> <p><i>6.2 If the materials and services requested are not available in any of the suppliers on the list of accredited vendors.</i></p> <p><i>6.3 If a vendor has exclusive dealership of the item/service being acquired.</i></p>
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			<p><i>All exceptions to vendor accreditation require the approval of the Head of Administrative Services.</i></p> <p><i>7. All Supplier Accreditation and the exceptions to the process require the approval of the Head of Administrative Services Department."</i></p> <p>The attached policy contains the details of the selection process.</p> <p><b>Source Document:</b></p> <p><b><u>Sun Life Grepa Policy on Supplier Accreditation Performance Evaluation</u></b>  <a href="https://www.sunlifegrepa.com/upload/files/SLGFI%20Policy%20on%20Supplier%20Accreditation%20and%20Performance%20Evaluation.pdf">https://www.sunlifegrepa.com/upload/files/SLGFI%20Policy%20on%20Supplier%20Accreditation%20and%20Performance%20Evaluation.pdf</a></p>
C.1.9	Environmentally-friendly value chain		<p>YES</p> <p><b>Environmental responsibility</b></p> <p>SLGFI recognizes the links between a healthy planet and a healthy economy, on which its business depends. By improving its environmental performance and embedding environmental, social and governance factors into its investment decisions, SLGFI is creating a more sustainable organization while supporting the transition to a lower-carbon economy.</p> <p><b>Operational Footprint</b></p> <p>"Reducing GHG Emissions</p>

			<p><i>Between 2015 and 2017, we achieved a 7% reduction in GHG emissions across our combined corporate real estate and Real Estate Investment portfolio, x x x."</i></p> <p><b>Energy</b></p> <p><i>"Between 2015 and 2017, we achieved a 5% reduction in energy use intensity across our combined corporate real estate and Real Estate Investment portfolio x x x. Our energy use intensity is declining as we continue to implement energy-efficiency projects and innovative energy management programs, and build employee and tenant awareness of their roles in reducing energy consumption."</i></p> <p><b>Sun Life Financial named one of the 2018 Global 100 Most Sustainable Corporations in the World</b></p> <p><i>"Sun Life Financial is one of the 2018 Global 100 Most Sustainable Corporations in the World, as selected by Corporate Knights, a Toronto-based media and investment advisory company. We are one of just 4 Canadian companies across all sectors – and the only Canadian insurance company – to earn a spot among the 2018 Global 100.</i></p> <p><i>Applying a data-driven approach, Corporate Knights assesses about 7,000 companies against global industry peers on a suite of up to 17 quantitative key performance indicators covering</i></p>
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			<p><i>resource, employee and financial management, green revenue and supplier performance.”</i></p> <p><b><u>Source Documents:</u></b></p> <p><b><u>2017 Sustainability Report/ Environmental Responsibility (Pages 25-34)</u></b>  <a href="https://www.sunlifegrepa.com/upload/files/Sustainability_Report_E2017.pdf">https://www.sunlifegrepa.com/upload/files/Sustainability_Report_E2017.pdf</a></p> <p><b><u>Sun Life Financial Canada Website/ Achievements</u></b>  <a href="https://www.sunlife.ca/ca/About+us/Achievements?vgnLocale=en_CA">https://www.sunlife.ca/ca/About+us/Achievements?vgnLocale=en_CA</a></p>
C.1.10	Interaction with the communities		<p>YES</p> <p>The following are the activities engaged in by the Company in support of this policy:</p> <p><b><i>“Getting active to awareness</i></b></p> <ul style="list-style-type: none"> <li>• <i>Established the Sun Life Resolution Run event encouraging people to be more active in Hong Kong and Malaysia. It will expand to the Philippines, Indonesia and Vietnam in 2018.</i></li> <li>• <i>Hosted Sun Life Cycle PH event in Bonifacio Global City in Taguig, which included ride categories for children and adults.</i></li> <li>• <i>Hosted the Sun Life Jakarta Diabetes Walk in Indonesia, to encourage the public, our Clients and our employees to adopt healthier lifestyles.</i></li> </ul>

			<p><b><i>Philippines foundation marks 10<sup>th</sup> year with active living projects</i></b></p> <p><i>Launched new projects through the Sun Life Foundation in the Philippines to improve health, wellness and education in disadvantaged communities. For example, to create a safe space for people to get fit and stay healthy, the Foundation is creating a linear park with a lighted pathway in Marikina City to benefit 19,000 households in the area.</i></p> <p><b>Corporate Social Responsibility</b></p> <p><i>“ Sun Life Grepa Financial, Inc. (Sun Life Grepa), one of the top life insurance companies in the country, raises overall employee engagement with “Share the Passion”, its corporate social responsibility (CSR) program.</i></p> <p><i>In coordination with AY Foundation, the corporate social responsibility arm of the Yuchengco Group of Companies, Sun Life Grepa employees volunteered to serve at the Arnold Janssen Kalinga Center in Tayuman, Manila. The volunteering sessions were held on June 29 and November 16, 2017, with employees assisting in serving homeless people in Tayuman with free meals and baths offered by the center.</i></p> <p><i>Blood donation activities have also been part of the employee’s calendar. The company held a one-day blood donation drive on August 8, 2017. The donations were received by the Philippine</i></p>
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			<p><i>General Hospital Hematology-Oncology Department.</i></p> <p><i>The company also supported Sun Life Financial Philippines' SINAG Teachers Conference held on June 6 at the AIM Conference Center. Sun Life Grepa employees gave financial literacy booklets to the attending teachers and also acted as game facilitators during the program's PRAXIS game portion."</i></p> <p>Through several projects of the Sun Life Foundation, the Company also engaged in the following activities:</p> <p><b><i>Education</i></b></p> <p><i>Sun Life Foundation will work with Children of Asia for the Comprehensive Education Sponsorship Program, which will help 208 elementary and high school students living in slum areas in Cebu pursue their studies.</i></p> <p><i>Another project in line with education is the Project 120 Classrooms, which is in partnership with Children's Hour. The project was launched way back 2015 to assist the rebuilding of schools affected by the Bohol earthquake and Super Typhoon Yolanda. This 2017, Sun Life Foundation and Children's Hour will build more school buildings in remote areas in Leyte and Camarines Sur.</i></p> <p><b><i>Environment</i></b></p>
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			<p><i>In partnership with ABS-CBN Lingkod Kapamilya Foundation, Inc., Sun Life Foundation will construct a Linear Park with a lighted pathway in the Tumana-Malanday Creek in Marikina City. The project will benefit 19,000 households in the area and is expected to impact peace and order in the community and promote security especially at night with the mounting of the lighted pathways. There are plans to maximize adjacent areas for family wellness activities, thus encouraging community ownership and promoting the bayanihan spirit.</i></p> <p><b>Health</b></p> <p><i>Health care services will be the main focus of the project with Gota de Leche, which will have 280 beneficiaries from disadvantaged communities in Manila, Ifugao, Guimaras, and Gilutangan Island, Cebu.</i></p> <p><i>Sun Life Foundation and International Care Ministries will work together for the Family Academy program, which will provide children with personalized one-on-one learning sessions at home, and will support holistic development that will focus on intensive parent/child coaching, health and sanitation practices, provision of nutri-packs to families, start-up business trainings, loans and savings group, and parenting classes.</i></p> <p><i>Sun Life Foundation will also continue its partnership with Kythe Foundation, wherein it</i></p>
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			<p><i>will support three programs: educational assistance for cancer survivors, Kythe Survivor's Day – A Bootcamp for Kythe Survivors, and the Share-a-Fare program.</i></p> <p><i>Working hand-in-hand with UNILAB Foundation, Sun Life Foundation will also sponsor innovative programs that will address the health needs of communities and will also empower and equip the youth to help underserved communities.”</i></p> <p><b><u>Source Documents:</u></b></p> <p><b><u>Sun Life Website/ Newsroom</u></b>  <a href="https://www.sunlife.com.ph/PH/About+us/Newsroom/Press+release/2017/Sun+Life+Foundation+Marks+10th+Anniversary+With+New+Projects?vgnLocale=en_CA">https://www.sunlife.com.ph/PH/About+us/Newsroom/Press+release/2017/Sun+Life+Foundation+Marks+10th+Anniversary+With+New+Projects?vgnLocale=en_CA</a></p> <p><b><u>2017 SLGFI Annual Report/ Corporate Social Responsibility (Pages 44-45)</u></b>  <a href="https://www.sunlifegrepa.com/upload/files/SLGFI%202017%20Corporate%20Annual%20Report.pdf">https://www.sunlifegrepa.com/upload/files/SLGFI%202017%20Corporate%20Annual%20Report.pdf</a></p> <p><b><u>2017 Sustainability Report/ Community Wellness (Pages 35-38)</u></b>  <a href="https://www.sunlifegrepa.com/upload/files/Sustainability_Report_E2017.pdf">https://www.sunlifegrepa.com/upload/files/Sustainability_Report_E2017.pdf</a></p>
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C.1.11	Anti-corruption programmes and procedures		YES	<p>SLGFI rejects bribery and corruption and has guidelines in place to manage potential conflicts of interest that may arise from giving and accepting gifts, hospitality and entertainment. Sun Life’s Code of Business Conduct provides:</p> <p><b>“Rejecting Corruption and Bribery</b></p> <p><i>Sun Life is committed to complying with the letter and spirit of anti-corruption and anti-bribery laws in all of the countries in which it operates. It prohibits the direct or indirect use of bribery, kickbacks, payoffs, or other corrupt practices by employees, agents, or other parties acting on behalf of Sun Life, especially in our business relationships including those with suppliers, customers and government representatives.”</i></p> <p><b><u>Source Documents:</u></b></p> <p><b><u>Company Policies: Rejecting Corruption and Bribery</u></b>  <b><u>Company Polices: Accepting and Giving Gifts and Entertainment</u></b>  <a href="https://www.sunlifegrepa.com/CorporateGovernance.aspx">https://www.sunlifegrepa.com/CorporateGovernance.aspx</a></p> <p><b><u>Code of Business Conduct: Rejecting Corruption and Bribery (Page 13)</u></b>  <b><u>Code of Business Conduct: Accepting and Giving Gifts and Entertainment (Page 14)</u></b>  <a href="https://www.sunlifegrepa.com/upload/files/Code%20of%20Business%20Conduct.pdf">https://www.sunlifegrepa.com/upload/files/Code%20of%20Business%20Conduct.pdf</a></p>
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C.1.12	Creditors' rights		YES	<p>Creditors' rights are protected through the observance of the following standards:</p> <p><b>Maintaining Books and Records</b></p> <p><i>“Sun Life is required to maintain accurate, reliable and complete records to appropriately manage its affairs and comply with legal, regulatory, financial, accounting and operational obligations. Through the maintenance of accurate records and reports, creditor’s rights are safeguarded. Sun Life provides accurate, consistent, informative and timely disclosures of information to the market which includes its creditors in accordance with applicable laws.</i></p> <p><i>Sun Life’s financial statements, books and records accurately reflect all business transactions and retained in accordance with our record keeping practices. Failing to disclose or record revenues, expenses, assets or liabilities is prohibited.</i></p> <p><i>The Company is responsible for the integrity of books and business, financial accounting and expense records under its control. “</i></p> <p><b>Maintaining Appropriate Controls</b></p> <p>SLGFI’s internal controls are designed to provide reasonable assurance that:</p> <ul style="list-style-type: none"> <li>- Operations are effective and efficient</li> <li>- Financial reporting is reliable and</li> </ul>
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			<ul style="list-style-type: none"> <li>- SLGFI complies with laws and regulations</li> </ul> <p>SLGFI’s internal control is reflected in the Company’s strong control environment, which includes:</p> <ul style="list-style-type: none"> <li>- The Audit and Risk Management Committees, which provide oversight and guidance over internal control practices and SLGFI’s financial reporting</li> <li>- A commitment to acting ethically as set out in the Code</li> <li>- A sound organizational structure reflecting clear and appropriate accountabilities and authorities and</li> <li>- Competent and appropriately compensated employees</li> </ul> <p><i>“Rights of Creditors</i></p> <p><i>Sun Life’s main creditors are its suppliers. At Sun Life, we want to do business with suppliers that share our values – integrity, engagement, Client focus, excellence, value and innovation – and that can meet our business requirements.</i></p> <p><i>Our Strategic Sourcing team identifies and evaluates potential suppliers, then negotiates with and contracts with them to efficiently and cost-effectively procure high-quality goods and services. We assess suppliers on the products and services they</i></p>
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			<p><i>offer, as well as their demonstrated ability to meet our business needs.</i></p> <p><i>We expect our suppliers to share our business values and to follow prudent business practices, including business integrity and the responsible treatment of individuals.</i></p> <p><i>We engage with suppliers that share our commitment, as outlined in our Code of Business Conduct, to:</i></p> <ul style="list-style-type: none"><li><i>• Acting ethically and complying with applicable laws</i></li><li><i>• Following responsible business practices</i></li><li><i>• Following responsible employment practices and providing safe working conditions</i></li><li><i>• Caring for the community and the environment</i></li></ul> <p><i>We are committed to fair and open competition under the highest ethical standards when dealing with our suppliers. These standards – professionalism, honesty and integrity – are reflected in our Code of Conduct.</i></p> <p><i>Sun Life periodically or when requested submit reports to its creditors on its financial condition through the published Audited Financial Statements and other</i></p>
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			<p><i>Certifications issued by any of its duly authorized officers. The provision of the Annual Report or Audited Financial Report ensures the Creditors of the Company's financial soundness.</i></p> <p><i>Sun Life also submits to the Securities and Exchange Commission and the Insurance Commission its audited Financial Statements and Annual Statement. As these become public documents once submitted to the regulators, the creditors of the company are also given access to these reports to apprise them of the Financial Condition or status of the Company thereby safeguarding their rights as creditors.</i></p> <p><i>The Company also provides prompt and accurate reports of its financial standing to its creditors. It is the policy of Sun Life to protect the rights of its creditors by maintaining, at all times, the company's good credit standing. In furtherance thereof, the Company strictly observes contractual obligations, and regard fair and truthful disclosure and transparency of financial records and dealings of utmost importance to assure creditors of the Company's continued credit worthiness.</i></p> <p><i>Moreover, the Company's risk based approach to business and adoption of good corporate governance practices further assures the creditors that the company is</i></p>
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				<p><i>effectively managing its risks and is committed to sustaining the growth of the Company.”</i></p> <p><b><u>Source Documents:</u></b></p> <p><b><u>SLGFI Website /Company Policies: Maintaining Books and Records</u></b>  <a href="https://www.sunlifegrepa.com/CorporateGovernance.aspx">https://www.sunlifegrepa.com/CorporateGovernance.aspx</a></p> <p><b><u>Code of Business Conduct: Maintaining Appropriate Controls (Page 24)</u></b>  <b><u>Code of Business Conduct: Maintaining Books and Records (Page 23)</u></b>  <a href="https://www.sunlifegrepa.com/upload/files/Code%20of%20Business%20Conduct.pdf">https://www.sunlifegrepa.com/upload/files/Code%20of%20Business%20Conduct.pdf</a></p> <p><b><u>SLGFI Website/Company Policies: Rights of Creditors</u></b>  <a href="https://www.sunlifegrepa.com/CorporateGovernance.aspx">https://www.sunlifegrepa.com/CorporateGovernance.aspx</a></p>
C.1.13	Does the company have a separate corporate responsibility (CR) report/section or sustainability report/section?	<p><b>OECD Principle V (A):</b>  Disclosure should include, but not be limited to, material information on:  (7) Issues regarding employees and other stakeholders.</p> <p>Companies are encouraged to provide information on key issues relevant to employees and other</p>	YES	<p>The Sustainability Report is published on the Company’s website. The Annual Report also contains the discussion of the Company’s Corporate Social Responsibility (CSR) Program. The CSR activities are featured in the “News Room” section of the website.</p> <p>The following is also available under the Company Policies section posted on the website.</p>



		<p>stakeholders that may materially affect the long term sustainability of the company.</p>	<p><i>“We are committed to the principle of sustainability in the conduct of our business. Corporate sustainability is at the core of our mission of helping customers achieve lifetime financial security. It is fundamental to our business model and in many ways is embedded in everything that we do to ensure we meet our commitments to customers and other stakeholders - employees, shareholders, and investors - over the long term.</i></p> <p><i>Today, being a sustainable company means more than taking actions to protect and preserve the environment and being a good corporate citizen; it means striving to actively consider environmental, social and governance impacts, risks and opportunities in the way we conduct our business to strengthen our business today and into the future. If you have any suggestions to improve the sustainability of our business practices, please submit them to the Sustainability Program on The Source.”</i></p> <p>Sun Life Foundation</p> <p><i>“When Sun Life established its roots in the Philippines, we made a commitment to help Filipinos achieve a sustainable future.</i></p> <p><i>Our Sun Life employees and advisors took this collective purpose at heart, while also sharing the light of the Sun with generous and charitable acts. Such was the beginning of the Sun Life Foundation and the spirit of volunteerism passed on from one generation to the next.</i></p>
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			<p><i>Incorporated in 2007, the Sun Life Foundation commits to ‘building a Brighter World’ to help alleviate the plight of those who are most in need. Anchored by its pillars of Education, Health, Environment, together with Arts &amp; Culture, our Corporate Social Responsibility arm provides assistance to numerous organizations with similar advocacies.</i></p> <p><i>As the Foundation celebrates a decade of giving back, it will broaden the reach of our Financial Literacy advocacy, from its partner communities to the general public.</i></p> <p><i>Because for Sun Life, a Brighter World ensures the future of generations while creating a prosperous present.”</i></p> <p><b>Source Documents:</b></p> <p><b><u>2017 Sustainability Report</u></b> <a href="https://www.sunlifegrepa.com/upload/files/Sustainability_Report_E2017.pdf">https://www.sunlifegrepa.com/upload/files/Sustainability_Report_E2017.pdf</a></p> <p><b><u>Sun Life Grepa Website/Corporate Governance/ Company Policies</u></b> <a href="https://www.sunlifegrepa.com/CorporateGovernance.aspx">https://www.sunlifegrepa.com/CorporateGovernance.aspx</a></p> <p><b><u>2017 Annual Report/Corporate Social Responsibility (Page 44)</u></b> <a href="https://www.sunlifegrepa.com/upload/files/SunLife%202017%20Corporate%20Annual%20Report.pdf">https://www.sunlifegrepa.com/upload/files/SunLife%202017%20Corporate%20Annual%20Report.pdf</a></p>
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				<b>Sun Life Foundation</b> <a href="https://www.sunlife.com.ph/PH/About+us/Sun+Life+Foundation?vgnLocale=en_CA">https://www.sunlife.com.ph/PH/About+us/Sun+Life+Foundation?vgnLocale=en_CA</a>
<b>C.2</b>	<b>Where stakeholder interests are protected by law, stakeholders should have the opportunity to obtain effective redress for violation of their rights.</b>			
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?	<b>OECD Principle IV (B):</b> Where stakeholder interests are protected by law, stakeholders should have the opportunity to obtain effective redress for violation of their rights.  The governance framework and processes should be transparent and not impede the ability of stakeholders to communicate and to obtain redress for the violation of rights.	YES	The contact details are provided under the Reporting Code Breaches of the Policies section of the Corporate Governance page. The contact details may also be found in the Annual Report.  The “Contact Us” of the Company Website provides for the contact details where customers, suppliers, general public etc. may voice or raise any of their concerns, complaints, feedback or suggestions (Website, Company, Product and Services and Other Matters)  In the 2017 Annual Report, there is a section on “Whistle Blower and Breach Policy and its corresponding contact details. To wit:  <i>“The Whistle Blower program of the Company provides a formal mechanism and channel for directors, officers, employees, suppliers, business partners, contractors and sub-contractors, and other third parties to raise serious concerns about a perceived wrongdoing or questionable or unethical behavior or transaction, malpractice, or any risk involving the Company or any of its officers and employees. Sun Life strictly prohibits</i>

			<p><i>any form of retaliation against those reporting concerns in good faith and guarantees that the whistleblower will be shielded or free from reprisals, harassment, or disciplinary action.</i></p> <p><i>Suspected breaches of the Sun Life Grepa Code of Business Conduct, the same must be promptly reported to the Compliance Officer, Head of Human Resources, or the General Counsel. Suspected breaches may also be reported anonymously through the following Ethics Hotline numbers available 24 hours a day.</i></p> <p><i>Dial 105-11 or 105-12 (cell phone - no "02" prefix)</i> <i>Dial 1010-5511-00 (landline)</i></p> <p><i>You'll be prompted to dial the Alertline number 800 481 6966</i> <i>For English please select "1"</i> <i>For Tagalog please select "9"</i></p> <p><i>The whistleblower may also submit his or her report or concern in writing directly to the Compliance Officer, or by email to: <a href="mailto:slf_code_of_business_conduct@sunlife.com">slf_code_of_business_conduct@sunlife.com</a></i></p> <p><b><u>Source Documents:</u></b></p> <p><b>Sun Life Grepa Website/Contact Us</b> <a href="https://www.sunlifegrepa.com/ContactUs.asp">https://www.sunlifegrepa.com/ContactUs.asp</a> <a href="#">X</a></p>
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				<p><b>Company Policies: Reporting Code Breaches</b>  <a href="https://www.sunlifegrepa.com/CorporateGovernance.aspx">https://www.sunlifegrepa.com/CorporateGovernance.aspx</a></p> <p><b>2017 Annual Report: Whistleblower and Breach Policy (Page 43)</b>  <a href="https://www.sunlifegrepa.com/upload/files/SLGFI%202017%20Corporate%20Annual%20Report.pdf">https://www.sunlifegrepa.com/upload/files/SLGFI%202017%20Corporate%20Annual%20Report.pdf</a></p>
<b>C.3</b>	<b>Performance-enhancing mechanisms for employee participation should be permitted to develop.</b>			
C.3.1	Does the company explicitly disclose the health, safety, and welfare policy for its employees?	<p><b>OECD Principle IV (C):</b>  Performance-enhancing mechanisms for employee participation should be permitted to develop. In the context of corporate governance, performance enhancing mechanisms for participation may benefit companies directly as well as indirectly through the readiness by employees to invest in firm specific skills.</p> <p>Firm specific skills are those skills/competencies that are related to production technology and/or organizational aspects that are unique to a firm.</p> <p>Examples of mechanisms for</p>	YES	<p>The Company explicitly discloses the health, safety, and welfare policy for its employees through the Code of Business Conduct, which the employees acknowledge upon hiring and affirm annually through the online training on Code of Business Conduct.</p> <p><b>Promoting Fairness and Safety in the Workplace</b></p> <p><i>"You are critical to our success. We are committed to safety and fairness in the workplace and recognize that a diverse workforce allows us to serve our customers most effectively. We will not tolerate unlawful discrimination, harassment or violence at work. We must all work to maintain a safe and healthy work environment."</i></p>

		<p>employee participation include: employee representation on boards; and governance processes such as works councils that consider employee viewpoints in certain key decisions. With respect to performance enhancing mechanisms, employee stock ownership plans or other profit sharing mechanisms are to be found in many countries.</p>	<p><i>Specifically, we do not unlawfully discriminate against co-workers, customers or anyone else we encounter in the course of our work on the basis of their race, colour, religion, sex, sexual orientation, national origin, citizenship, creed, age, marital status, family status, disability, or other grounds included in human rights legislation.</i></p> <p><i>Acts and threats of violence affect everyone's safety and must be reported immediately. We must not engage in threatening, intimidating or violent acts against co-workers, customers or anyone else encountered in our work. Sexual or other harassment, or offensive behaviour, such as verbal abuse or unnecessary physical contact, are also prohibited.</i></p> <p><i>The use of illicit drugs and alcohol can negatively affect job performance and cause severe safety hazards. As a general rule, illicit drugs or alcohol may not be brought into or consumed in the workplace. If you are found in possession of or under the influence of illicit drugs or alcohol at work, you may be subject to discipline and possible termination of your employment."</i></p> <p><b>GoWell</b> Employee health and welfare are also promoted through GoWell, a wellness community aimed at helping people live healthier, brighter lives. Through its website <a href="http://www.gowell.com.ph">www.gowell.com.ph</a>, Sun Life offers clients, employees and other Filipinos fitness and wellness content for the body, mind</p>
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			<p>and soul, and provides access to community workouts such as Zumba, cycling classes and yoga. To further inspire Filipinos in their wellness journey, GoWell has tapped celebrity ambassadors who excel in their respective crafts to lead the community.</p> <p>GoWell members receive the following privileges:</p> <ul style="list-style-type: none"><li>• Access to fitness and wellness content</li><li>• Perks and privileges from our partner establishments</li><li>• Entry into GoWell events</li><li>• Opportunity to meet other health and wellness enthusiasts in the community</li></ul> <p>The GoWell program is open to SLGFI officers and employees.</p> <p><b><u>Source Documents:</u></b></p> <p><b><u>Company Policies/ Promoting wellness and Safety in the Workplace</u></b> <a href="https://www.sunlifegrepa.com/CorporateGovernance.aspx">https://www.sunlifegrepa.com/CorporateGovernance.aspx</a></p> <p><b><u>Code of Business Conduct/ Promoting Fairness and Safety in the Workplace (Page 17)</u></b> <a href="https://www.sunlifegrepa.com/upload/files/Code%20of%20Business%20Conduct.pdf">https://www.sunlifegrepa.com/upload/files/Code%20of%20Business%20Conduct.pdf</a></p> <p><b><u>Employee Benefits and Services Manual</u></b></p>
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C.3.2	Does the company publish relevant information relating to health, safety and welfare of its employees?		<p>YES</p> <p>Publication is done through the website, Social Media, the Code of Business Conduct and Sustainability Report. The annual training materials also contain information on health, safety and welfare of its employees.</p> <p><b>Promoting Fairness and Safety in the Workplace</b></p> <p><i>“You are critical to our success. We are committed to safety and fairness in the workplace and recognize that a diverse workforce allows us to serve our customers most effectively. We will not tolerate unlawful discrimination, harassment or violence at work. We must all work to maintain a safe and healthy work environment.</i></p> <p><i>Specifically, we do not unlawfully discriminate against co-workers, customers or anyone else we</i></p>



			<p><i>encounter in the course of our work on the basis of their race, colour, religion, sex, sexual orientation, national origin, citizenship, creed, age, marital status, family status, disability, or other grounds included in human rights legislation.</i></p> <p><i>Acts and threats of violence affect everyone's safety and must be reported immediately. We must not engage in threatening, intimidating or violent acts against co-workers, customers or anyone else encountered in our work. Sexual or other harassment, or offensive behaviour, such as verbal abuse or unnecessary physical contact, are also prohibited.</i></p> <p><i>The use of illicit drugs and alcohol can negatively affect job performance and cause severe safety hazards. As a general rule, illicit drugs or alcohol may not be brought into or consumed in the workplace. If you are found in possession of or under the influence of illicit drugs or alcohol at work, you may be subject to discipline and possible termination of your employment."</i></p> <p><b><i>“Workforce Wellness</i></b> <i>Employee wellness underpins our ability to deliver exceptional service to Clients and attract and retain top talent. Research shows that a healthy employee is a more engaged employee and a more engaged employee is critical to the success of our high-performance culture.</i></p> <p><b><i>Our Approach</i></b></p>
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			<p><i>We are continuously investing in a culture of wellness that empowers our employees to be their best selves. We take a holistic view of workforce wellness by focusing on physical, mental and financial wellness. This approach helps frame our benefits programs, set priorities and embed wellness into Sun Life's culture.</i></p> <p><i>We invest in a wide variety of programs, incentives and services to promote wellness and help our employees identify health risks, prevent serious diseases and lead healthier lifestyles. Among our employee offerings are:</i></p> <ul style="list-style-type: none"><li><i>• Flexible work options</i></li><li><i>• Competitive benefits packages</i></li><li><i>• Retirement and savings plans</i></li><li><i>• Access to third-party confidential professional advice and support (Employee Assistance Program)</i></li><li><i>• A Benevolent Fund to assist employees and their families facing difficult financial circumstances due to illness, death or other unforeseen events."</i></li></ul> <p><i>Example of Employee Activities:</i></p> <p><b><u><a href="https://m.facebook.com/sunlifegrepa/photos/a.2112748392085869.1073741841.235709389789788/2112751435418898/?type=3&amp;rdc=1&amp;rdr">m.facebook.com/sunlifegrepa/photos/a.2112748392085869.1073741841.235709389789788/2112751435418898/?type=3&amp;rdc=1&amp;rdr</a></u></b></p> <p><b><u>Sun Life Grepa 2017 Christmas Party</u></b></p>
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C.3.3	Does the company have training and development programmes for its employees?		<p>YES</p> <p>The Training section is part of the Performance Management and Career Development Manual.</p> <p><b><i>“Trainings</i></b>  <i>The Company sponsors employees to trainings. These trainings are meant to assist employees in (a) improving current job performance, (b) acquiring additional professional credentials relevant to the Company’s business, and c) preparing for possible future roles in the Company.</i></p>

			<p><i>Training plans are endorsed to HR, which shall, among others, act as clearing house to protect training investments. A maximum of 2 employees per Division may attend the same external training or convention at the same time. A justification is required for any external training or convention where more than 2 employees from the same Division are to attend. To ensure that the employee uses his new learnings/credentials in helping the Company reach its goals, Training Commitment Forms shall be signed by the employee prior to the training program. This can either be tenured (in cases when the training investment is deemed substantial) or non-tenured (stating how employee shall use the training). Failure to comply with the written commitment shall make the employee liable to reimburse the Company, either in full or partially, for the cost of training and related items. A copy of the training certificate of completion/ attendance should be turned over to HR for the employee's 201 file. Any obtained training material should also be turned over to HR either for tagging purposes or for use in the library."</i></p> <p><b><i>"LOMA Educational Program</i></b> <i>The Company sponsors employees to the Life Office Management Association (LOMA) Educational Program. It is a 10-course, self study program that provides a comprehensive business education in the context of the insurance and financial services industry."</i></p>
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			<p><b>“Employee Training and Development</b>  <i>Sun Life Grepa is committed to provide its employees with opportunities for learning and development. These investments are prioritized according to its alignment with Sun Life Grepa’s strategic direction and goals. Sun Life Grepa offers a versatile learning environment that incorporates various training aspects: formal learning i.e. classroom-based programs; informal learning i.e. experience-based / on-the job development; and relationship-based development i.e. coaching and feedback. In 2017, people leaders completed an average of 100 formal training hours while individual contributors fulfilled an average of 56 formal training hours.”</i></p> <p><b>Source Documents:</b></p> <p><b><u>Performance Management and Career Development Manual (Pages 3-5)</u></b>  <a href="https://www.sunlifegrepa.com/upload/files/SLGFI%20Performance%20Management%20Career%20Development.pdf">https://www.sunlifegrepa.com/upload/files/SLGFI%20Performance%20Management%20Career%20Development.pdf</a></p> <p><b><u>2017 Annual Report: Employee Training and Development (Page 27)</u></b>  <a href="https://www.sunlifegrepa.com/upload/files/SLGFI%202017%20Corporate%20Annual%20Report.pdf">https://www.sunlifegrepa.com/upload/files/SLGFI%202017%20Corporate%20Annual%20Report.pdf</a></p>
C.3.4	Does the company publish relevant information on training		<p>YES</p> <p>This is published through the Performance Management and Career Development Manual posted on SLGFI’s website.</p>

	and development programmes for its employees?		<p><b><i>“Trainings</i></b></p> <p><i>The Company sponsors employees to trainings. These trainings are meant to assist employees in (a) improving current job performance, (b) acquiring additional professional credentials relevant to the Company’s business, and c) preparing for possible future roles in the Company.</i></p> <p><i>Training plans are endorsed to HR, which shall, among others, act as clearing house to protect training investments. A maximum of 2 employees per Division may attend the same external training or convention at the same time. A justification is required for any external training or convention where more than 2 employees from the same Division are to attend. To ensure that the employee uses his new learnings/credentials in helping the Company reach its goals, Training Commitment Forms shall be signed by the employee prior to the training program. This can either be tenured (in cases when the training investment is deemed substantial) or non-tenured (stating how employee shall use the training). Failure to comply with the written commitment shall make the employee liable to reimburse the Company, either in full or partially, for the cost of training and related items. A copy of the training certificate of completion/ attendance should be turned over to HR for the employee’s 201 file. Any obtained training material should also be turned</i></p>
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			<p>over to HR either for tagging purposes or for use in the library.”</p> <p><b>“LOMA Educational Program</b>  <i>The Company sponsors employees to the Life Office Management Association (LOMA) Educational Program. It is a 10-course, self study program that provides a comprehensive business education in the context of the insurance and financial services industry.”</i></p> <p><b>Source Documents:</b></p> <p><b><u>Performance Management and Career Development Manual (Pages 3-5)</u></b>  <a href="https://www.sunlifegrepa.com/upload/files/SLGFI%20Performance%20Management%20Career%20Development.pdf">https://www.sunlifegrepa.com/upload/files/SLGFI%20Performance%20Management%20Career%20Development.pdf</a></p> <p><b><u>2017 Annual Report: Employee Training and Development (Page 27)</u></b>  <a href="https://www.sunlifegrepa.com/upload/files/SLGFI%202017%20Corporate%20Annual%20Report.pdf">https://www.sunlifegrepa.com/upload/files/SLGFI%202017%20Corporate%20Annual%20Report.pdf</a></p>
C.3.5	Does the company have a reward/compensation policy that accounts for the performance of the company beyond short-term financial measures?		<p>YES</p> <p><i>Sun Life recognizes and rewards achievements and results in line with our “Pay for Performance” policy. Through your performance, you will be able to directly influence your compensation. Here, we reward exceptional job performance and provide support that would help you to accomplish goals.</i></p>

			<p>The Manual on Rewards and Compensation is available on SLGFI’s website.</p> <p><b>“Reward and Compensation</b>  <i>Consistent with its goal to build a high performance culture, Sun Life Grepa espouses a “pay for performance” philosophy. The total reward package is designed to attract and retain high performing individuals, as well as to reinforce behaviors that support Sun Life Grepa’s short- and long-term objectives. There are two ways by which Sun Life Grepa clearly links pay to performance: the annual merit increase and the variable pay. The annual merit increase recognizes individual achievement of both business goals for the year and people/capability goals that build on the company’s capability and long term sustainability.”</i></p> <p><b>Source Documents:</b></p> <p><b><u>2017 Annual Report: Reward and Compensation (Page 27)</u></b>  <a href="https://www.sunlifegrepa.com/upload/files/SLGFI%202017%20Corporate%20Annual%20Report.pdf">https://www.sunlifegrepa.com/upload/files/SLGFI%202017%20Corporate%20Annual%20Report.pdf</a></p> <p><b><u>Compensation Policy Manual</u></b>  <a href="https://www.sunlifegrepa.com/upload/files/SLGFI%20Policy%20Manual%20-%20Compensation.pdf">https://www.sunlifegrepa.com/upload/files/SLGFI%20Policy%20Manual%20-%20Compensation.pdf</a></p>
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				<p><b>Performance Management and Career Development Manual (Pages 3-5)</b></p> <p><a href="https://www.sunlifegrepa.com/upload/files/SLGFI%20Performance%20Management%20Career%20Development.pdf">https://www.sunlifegrepa.com/upload/files/SLGFI%20Performance%20Management%20Career%20Development.pdf</a></p>
<b>C.4</b>	<b>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.</b>			
C.4.1	Does the company have procedures for complaints by employees concerning illegal (including corruption) and unethical behaviour?	<p><b>OECD Principle IV (E):</b></p> <p>Stakeholders, including individual employees 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.</p>	YES	<p>The Code of Business Conduct specified the procedures that must be followed for complaints by employees.</p> <p><i>“HOW DO I REPORT A BREACH OF THE CODE?”</i></p> <p><i>Advise your manager, human resources, a compliance officer of someone in the law department If you believe YOU may have contravened the Code.</i></p> <p><i>If you know or suspect that SOMEONE ELSE has contravened the Code or you feel you are being pressured to violate the law or your ethical responsibilities, advise your manager, human resources, the general counsel, or senior compliance officer in your business group, or the chief compliance officer. If you would prefer to report the situation anonymously, or if you feel that someone has not responded appropriately to your report, use the Employee Ethics Hotline.</i></p>

			<p><i>You can access the Hotline either through a toll-free telephone number (local telephone information is available on The Source) or a secure website on the Internet (at <a href="http://www.employee-ethics-hotline.com">www.employee-ethics-hotline.com</a>). The Hotline services are handled by an outside service provider, and are available to all employees, seven days a week, 24 hours a day in multiple languages.</i></p> <p><i>If you suspect a breach has taken place, do not attempt to deal with the situation yourself. Your identity in any follow up discussions or inquiries will be kept in confidence to the extent appropriate or permitted by law.</i></p> <p><i>Reporting misconduct and breaches of the Code contributes to the ethical culture at Sun Life and helps us maintain our commitment to high standards of business ethics and integrity.”</i></p> <p>Note that SLGFI has adopted the same Code of Business Conduct of Sun Life of Canada (Philippines), Inc. Annually, SLGFI employees and Directors are asked to acknowledge/ confirm their adherence to the same. Refresher training is also taken annually on this subject.</p> <p><b>Source Document:</b></p> <p><b><u>Code of Business Conduct: Reporting Code Breaches (Page 5-6)</u></b></p>
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C.4.2	Does the company have a policy or procedures to protect an employee/person who reveals illegal/unethical behavior from retaliation?		YES	<p>The Company has a policy, which protects employee who reveals illegal/unethical behavior from retaliation. Sun Life strictly prohibits any form of retaliation against employees for reporting concerns in good faith.</p> <p>This is clearly provided in the Code of Business Conduct.</p> <p><i>“Sun Life takes violations of the Code seriously and investigates all reports and allegations. Investigations are handled discreetly to the extent permitted by policy or law.</i></p> <p><b><i>Sun Life strictly prohibits any form of retaliation against employees for reporting concerns in good faith. If you report a breach in good faith, no action will be taken against you even if we cannot corroborate your concern. However, a mischievous or malicious allegation of a breach is itself a breach of the Code. “</i></b></p> <p><b>Source Document:</b></p> <p><b><u>Code of Business Conduct: Reporting Code Breaches (Page 5-6)</u></b>  <a href="https://www.sunlifegrepa.com/upload/files/Code%20of%20Business%20Conduct.pdf">https://www.sunlifegrepa.com/upload/files/Code%20of%20Business%20Conduct.pdf</a></p>

