

Republic of the Philippines
Department of Finance

INSURANCE COMMISSION
1071 United Nations Avenue
Manila

AML AND CTF COMPLIANCE QUESTIONNAIRE

GUEVENT INSURANCE BROKER CORPORATION

ACCOMPLISHED 29 JULY 2021

A. BOARD OF DIRECTOR AND SENIOR MANAGEMENT OVERSIGHT

1. Board Of Director (BOD) And Senior Management (SM) Oversight

- a. Is there a clear guidance from the BOD of the entity's strategic and operational plans and objectives in ensuring that the entity shall not be used as a ML and TF conduit? If so, please describe including the budget allocations to implement these plans and objectives. Have these plans and objectives been cascaded to Senior Management and responsible officers and employees? If so, state how this was done.

Answer: Yes. The company has adopted a Manual on Anti Money Laundering and cascaded the strict implementation thereof to the Senior Management including its Compliance Officer. The Senior Management is likewise directed to check for recent issuances relating to anti money laundering from regulatory agencies. The Senior Management and all responsible officers are provided a copy of the Manual and joins all relevant meetings in relation thereto. The budget allocations on the enforcement plan and programs are always taken into consideration during the annual budget planning of the company and relayed to the Treasury.

- b. In relation to question no. 1, please describe the control policies and mechanisms (e.g. reportorial requirements, rewards and disciplinary system, training program, etc.) adopted by the BOD to attain these policies and objectives.

Answer: The Company reflects in the employee's performance evaluations the diligence and prudence of officers in relation to enforcing the company's guidelines and charter which includes its programs in anti-money laundering and corporate

governance. The company also ensures that the employees are up to date in recent laws, rules and guidelines by having its internal counsel and compliance officer regularly brief the employees of the salient provisions of appropriate laws, rules and regulations. Moreover, the company endeavours to have appropriate employees attend relevant training programs to ensure that their knowledge on the issue is kept up to date.

- c. Please describe the entity's framework for ML and TF prevention. What are the roles of the BOD, Senior Management, Compliance Office, Internal Audit and other Offices in ML and TF prevention? What reports are required to be submitted to the BOD to assist them in their decision-making processes?

Answer: The role of the BOD is to provide, supplement and modify the Anti Money Laundering programs of the company and cascade its strict enforcement and monitoring of the same. The Senior Management acts as the conduit on reporting all relevant matters involving the issue for approval or appropriate action. The Compliance Officer and General Manager receives reports on suspicious transactions and acts that may be considered as unlawful activities under the Anti Money Laundering Act during the course of the company's operations, and investigate said matter for report to Senior Management. The reports that may be submitted are Suspicious Transaction Reports (STR) which is in the form of a letter addressed to the President / CEO of the company, with details on the amount involved, officer / client concerned and specific acts that prompted the STR.

- d. Please describe the risk management system relative to ML and TF prevention.

Answer: The company monitors all payments made by policy holders in GIBCO bank accounts and closely coordinate and comply with the bank officers in event of any issues or concerns. The company also has a Risk and Corporate Governance Committee that identifies, assess and monitor key risk exposures for appropriate reporting to the board of directors. The company has a risk assessment policy with regards the policies issues vis a vis the policy holders and other individuals and entities which identifies and evaluates risk exposures to money laundering and terrorism financing risks.

- e. Does the Compliance Office/Officer report directly to the BOD? If not, to whom does the Compliance office/officer report? How frequent is this done?

Answer: The Compliance Officer reports to the Senior Management (President / General Manager) and/or the Risk and Corporate Governance Committee. Nothing prohibits the said officers to report directly to the BOD if it finds it necessary. The report should be done once every month of operations or immediately upon knowledge of any suspicious transactions involving money laundering or terrorist financing activities.

- f. Please describe the authorities delegated by the BOD to the Compliance Office and the AML and CTF Compliance Officer related to ML and TF prevention.

Answer: The Compliance Officer reports to the Senior Management (President / General Manager) and/or the Risk and Corporate Governance Committee. The report should be done once every month of operations or immediately upon

knowledge of any suspicious transactions involving money laundering or terrorist financing activities.

- g. What other relevant oversight does the BOD and Senior Management exercise to ensure attainment of the entity's plans and objectives relative to ML and TF prevention?

Answer: The BOD and Senior Management exercise monthly monitoring of cash-flow reports. They shall likewise regularly consult with both the Audit Committee and Risk and Corporate Governance Committee to ensure that its systems and protocols are up to date when it pertains to money laundering and terrorist financing activities.

2. Identification, Measurement, Monitoring And Controlling Of Risks And Problems Related To ML And TF

- a. Have you conducted risk profiling of all existing customers? If not all, what percentage of the total customers count had been profiled?

Answer: Yes, the company has conducted risk assessment of its customers to understand the risk exposure to money laundering and terrorism financing risks.

- b. Have you conducted an assessment of the risks and vulnerabilities that your entity is exposed into? Please describe how the assessment was done.

Answer: The company has adopted a basic risk framework to assess the company's products, services, contracts to identify the risk exposure to ML and TF risks. At the minimum, all clients are required to provide proper KYC documentation and the same is verified and regularly monitored by the operation team. The customer information is likewise shared among the Guevent Group of companies in order to provide a more enhanced information database to fight against risks of money laundering. The company likewise ensures that the insurance principals have the appropriate documentation and licenses for their operations. The risks of company products and services offered by the company are very low, taking into account the amount involved and the purpose of the transactions. The National Risk Assessment conducted by the Anti Money Laundering Council is likewise taken into consideration in such assessments.

- c. What identified risks and vulnerabilities is the entity exposed into and how are these risks and vulnerabilities measured, monitored and controlled by the BOD and/or SM?

Answer: The risks and vulnerabilities in the operations are transacting with corporate entities and individuals who have a history of ML or TF activities or circumstances will show that they may be engaged in such activities. The company adopted a methodology used a risk based approach in ML risk assessment. The company identifies and categories risks and establishes reasonable controls based on identified risks.

3. Self Assessment Systems That Are Either Pro-Active, Through Compliance-Testing, Or Reactive, Through Internal Audit

- a. Have you conducted an over-all assessment of the entity's level of compliance with the Anti-Money Laundering Act of 2001 (AMLA), under Republic Act (R.A.) No. 9160, as amended by R.A. Nos. 9194, 10167, 10365 and 10927, the Terrorism Financing Prevention and Suppression Act (TFPSA), under R.A. No. 10168, their respective Implementing Rules and Regulations (IRR), Circular Letter (CL) No. 2018-48, as amended and other relevant laws, IC and AMLC issuances? Please describe how this was done and state the frequency of the assessment.

Answer: The company is tasked to conduct an assessment every two (2) years, or as often as the AMLC, SEC or Insurance Commission directs it. The company has a risk and control framework which it compares on recent issuances, circulars, rules and regulations issued by the appropriate government agencies. The company consults its Audit and Risk and Corporate Governance Committees to ensure that management oversight is effective and that there are internal control that strengthens ML and TF awareness over the illegal processes

- b. Based on the assessment, please state in percentage the level of compliance of the entity.

Answer: The company, as of the moment, cannot intelligently identify a percentage on the level of its compliance with the same.

- c. How are deviation from pre-set guidelines as well as deficiencies and weaknesses noted during internal and external audits corrected and what are the mechanisms undertaken to monitor implementation of corrective measures?

Answer: Deviation, as well as deficiencies and weaknesses during internal and external audits are immediately corrected after the fact. The company shall ensure that it adopts a strong corrective measure to avoid repeating the event. All appropriate events that require reporting shall be immediately reported to the appropriate government regulatory agency for their appropriate action despite the correction and adoption of the corrective measure.

- d. Has your entity recently undergone an internal audit on AML and CTF Compliance? If yes, please summarize the key findings and/or recommendations that were noted in the most recent internal audit report and set out the measures that the BOD has undertaken to address these findings and to monitor the same.

KEY FINDINGS	RECOMMENDED ACTIONS	PROGRESS/DEVELOPMENT
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Answer: There were no findings involving ML and TF activities.

- e. Has your entity recently undertaken compliance testing of other departments, units, offices and branches that is independent of the internal audit? If yes, please describe the process (whether on-site inspections were conducted) and summarize the key

findings and/or recommendations that were noted in the most recent compliance testing report and set out the measures that the BOD has undertaken to address these findings and to monitor the same.

KEY	RECOMMENDED	PROGRESS/DEVELOPMENT
FINDINGS	ACTIONS	

Answer: The company has not yet performed compliance testing on specific departments, units, offices and branches that is independent of the internal audit.

4. Management Information System

- a. Has the entity carried out an assessment of the effectiveness of the management information system as well as the AML and CTF electronic or manual, as applicable, monitoring system? Please specify how this is done.

Answer: The company's management information system includes the accounting system which has the database on all the products, clients, insurance principals, as well as the date and amounts of all transactions managed by the company. The company ensures that the basis of the data encoded in the MIS is consistent and equivalent to the policies issued to the clients, and that the same are based on authentic records.

- b. What reports are being submitted to the BOD or Board level/approved Committee to assist them in their decision making processes relative to ML and TF prevention, who signs them and how frequent are they being required?

Answer: The BOD and the appropriate committee are provided all financial reports that are collated from different departments and officers. The BOD and the appropriate committee may ask for further documents to supplement and clarify any issues and concerns in relation to these reports if identified to assist in the fight against money laundering and terrorist prevention.

- c. Does the entity keep annual statistics on red flags systems alerts, ML investigations, CT reports, ST reports broken down as to the nature? If so, which Office requires and maintains the same? Please provide copies of the statistics.

Answer: The company does not have any red flag system alerts and investigations / reports in relation to money laundering and terrorist financing activities. It is however emphasised that all company reports and records are kept on record until the decision is made to archive or destroy the same after a considerable period of time has lapsed.

- d. Does the entity keep track dispositions of red flag systems alerts? If so, which Office requires and maintains the same? Please provide copies of the tracking report.

Answer: Yes, the company shall keep track of such and the information should be kept by the Compliance Officer and a copy should be kept by the Risk and Corporate Governance Committee.

5. Capability Of Compliance Office In Managing The Entity's MTPP

- a. Provide the names and contact details of AML and CTF Compliance and Alternate Compliance officers. Also, provide the name of another officer designated by the company who is responsible and accountable for all record keeping requirements under the AMLA, as amended, TFPsA, their respective IRR, CL No. 2018-48, as amended and other relevant laws, IC and AMLC issuances.

Answer: The Compliance Officer is Mr. Rolando Pierre Valenciano and the Alternate Compliance Officer is Melchor Jaemond Aranas. GM Gianina So-Limjoco shall be the officer responsible and accountable for all record keeping requirements under the AMLA, as amended, TFPsA, their respective IRR, CL No. 2018-48, as amended and other relevant laws, IC and AMLC issuances.

- b. Describe the structure of the Compliance Office including the financial, human and technical resources, delegated authorities, reporting and communication line, duties and responsibilities of the Office as a whole and of individual officers and staff together with their qualifications and experience as well as standards in hiring new employees, and control mechanisms (such as the power to monitor and ensure compliance including the authority to impose sanctions or give incentives or rewards when necessary) of the Office in ensuring that the pre-set objectives are adhered to by responsible officers and employees in the different Departments, Groups, Units and/or Branches?

Answer: The Compliance Officer is Mr. Rolando Pierre Valenciano and the Alternate Compliance Officer is Melchor Jaemond Aranas. GM Gianina So-Limjoco shall be the officer responsible and accountable for all record keeping requirements under the AMLA, as amended, TFPsA, their respective IRR, CL No. 2018-48, as amended and other relevant laws, IC and AMLC issuances.

- c. How are newly adopted policies and procedures as well as subsequent changes thereto assessed (as adequate or inadequate) and how are the results of the assessment communicated to the BOD, to Senior Management, to different Departments, Units, Groups, Sub-groups and to the Branches up to the frontliners and/or agents?

Answer: The newly adopted policies and procedures are assessed of their adequacy to actual company operations by monitoring their results and meetings with the appropriate employees and officers that are affected. The policies and procedures that merit consideration shall be submitted to the board thru inclusion in the agenda of the next succeeding board meeting where materials and reports are submitted.

- d. How is the adequacy of AML and CTF training assessed? Please specify in detail.

Answer: It is the policy of the company to ensure that all directors, officers and employees are informed and adequately trained. A feedback form is given to the persons at the end of the training. A written examination may also be administered to evaluate their level of understanding over the training conducted.

- e. Have you taken the necessary measures to prevent criminals or their associates from holding or being the beneficial owners of a significant or controlling interest or holding a management function, including membership in the Board or any Committee within your entity? If yes, please describe the measures taken.

Answer: The company is a member of the Guevent Group of companies which is owned and controlled by the Guevara family. The membership and ownership over the company is close knit and, aside from nominees for the directorship, the same is almost entirely limited to the group. Nonetheless, all stockholders, officers and directors are carefully screened. The Risk and Corporate Governance Committee is likewise responsible to identify and carefully examine potentially qualified members of the board.

- f. Do you have a screening process that ensures high standards when hiring employees? If yes, please indicate the specific policy provisions applicable.

Answer: All applicants undergo initial examination and screening as well series of interviews from supervisory level up to the President to ensure the high standards when recruiting employees. All potential applicants are required to provide their basic information to ensure that the company knows its employee (KYE). The Human Resource Manager is the one responsible in screening the candidates for employment using valid and reliable measures and procedures.

- g. Are the directors and senior management subject to internal "fit and proper" requirements including a check on their expertise and integrity? If yes, please provide the relevant policy provisions. If election, selection or appointment is based on family ties, please indicate.

Answer: The company has a Board Charter and Manual on Corporate Governance that highlights the qualifications and disqualifications of every member of the board, including the independent director. The qualifications are provided in III(e) [Qualification of Directors] pages 07-08 of said manual, and the disqualification are laid down in III(f) [Disqualification of Directors] pages 08-11 of said manual. The election, selection and appointments are clearly expressed in VII [Nomination and Election] page 26 thereof.

- h. Do you ensure that your foreign branches and subsidiaries observe AML and CTF measures consistent with the Philippine's legal requirements? If yes, please indicate the specific policy provisions.

Answer: The company has no foreign branches and subsidiaries.

- i. In connection with the last question, was there an instance when the home country supervisor where a foreign branch or subsidiary is located has prohibited the branch or subsidiary from observing the Philippine laws, rules and regulations because it is prohibited by local (i.e. host country) laws, regulations or other measures? If yes, have you notified the Insurance Commission (IC) of this directive? Please indicate the specific legal provision(s) that provide(s) the legal basis for this requirement.

Answer: The company has no foreign branches and subsidiaries.

- j. How are the provisions of the Money Laundering And Terrorist Financing Prevention Program (MTPP) disseminated to responsible officers, employees and agents and how are their compliance assessed and monitored?

Answer: All information and directives pertaining to the prevention of ML and TF activities are relayed to the responsible officers and employees either through formal meetings where all responsible staff are involved or through the issuance of appropriate memoranda in relation there to. The exercise of one communication option does not prohibit adoption of the other one.

- k. What other relevant management practices does the Compliance Office exercise to manage its MTPP and ensure attainment of the entity's plans and objectives relative to ML and TF prevention?

Answer: The Compliance Officer may be tasked to conduct periodic review and assessment of the company's compliance on applicable rules and regulations. He shall also be responsible to monitor all deficiencies if any that are noted during the periodic inspection or audit of the company relating to this and act as the coordinator between the company and the AMLC in matters relating to compliance. He also constantly monitors the management information system of the company.

6. Nature Of Weaknesses Noted And Ability To Address Existing And Potential Risks And Problems

- a. Has your entity undergone a previous AML and CTF Compliance Checking by the IC? If yes, please summarize the key findings and/or recommendations that were noted in the most recent AML and CTF report and set out the measures that the BOD has undertaken to address the findings and to monitor the same.

KEY FINDINGS	RECOMMENDED ACTIONS	PROGRESS/DEVELOPMENT
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Answer: The company has not yet undergone an AML and CTF compliance checking by the Insurance Commission.

- b. How are deviation from pre-set guidelines as well as deficiencies and weaknesses noted during internal and external audits corrected and what are the mechanisms undertaken to monitor implementation of corrective measures?

Answer: The company has not yet undergone an AML and CTF compliance checking by the Insurance Commission.

7. Institutional Risk Assessment

- a. Has your entity undergone an Institutional Risk Assessment? If yes, when was this conducted?

Answer: The company has not yet undergone an Institutional Risk Assessment.

b. Has your entity documented the risk assessment and findings? If yes, please summarize the key findings and/or recommendations that were noted in the most recent Institutional Risk Assessment and set out the measures undertaken to address the findings and to monitor the same.

KEY FINDINGS	RECOMMENDED ACTIONS	PROGRESS/DEVELOPMENT
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Answer: The company has not yet undergone an Institutional Risk Assessment.

c. Has your entity considered all the relevant risk factors, including the results of national and sectoral risk assessment, before determining what is the level of overall risk and the appropriate level and type of mitigation to be applied? If yes, please provide a summary.

Answer: The company has not yet undergone an Institutional Risk Assessment.

B. MONEY LAUNDERING AND TERRORIST FINANCING PREVENTION PROGRAM

1. Customer identification, Verification and Ongoing Monitoring Process

a. Does the entity apply a risk-based approach to combating money laundering and terrorist financing? If so, please provide an overview of these policies and procedures. The overview should:

- (1) portray the entity's philosophy towards risk-based (does it form an integral part of the entity's business framework?),
- (2) indicate how the relevant risk assessments are undertaken and their bases to help determine the policy and its practical application, and
- (3) describe the mechanism by which permitted variations from the generally applicable standards are promulgated, and what arrangements, if any, are in place to monitor the continuing suitability of the exceptions. Please provide the basis in the entity's MTPP.

Answer: The company has adopted a basic risk framework to assess the company's products, services, contracts to identify the risk exposure to ML and TF risks. At the minimum, all clients are required to provide proper KYC documentation and the same is verified and regularly monitored by the operation team. The customer information is likewise shared among the Guevent Group of companies in order to provide a more enhanced information database to fight against risks of money laundering. The company likewise ensures that the insurance principals have the appropriate documentation and licenses for their operations. The risks of company products and services offered by the company are very low, taking into account the amount involved and the purpose of the transactions. The National Risk Assessment conducted by the Anti Money Laundering Council is likewise taken into consideration in such assessments.

- b. Does your entity permit the opening of anonymous accounts, accounts in fictitious names and other accounts not otherwise under the true and full name of the customer/client? If yes, please indicate the approximate number of accounts, pertinent policies and procedures for opening and the level of approving authority.

Answer: No, the company does not permit the opening of any account without identifying the client's identity through evaluation of official records.

- c. Does your entity undertake customer due diligence (CDD) measures when:

- i. Establishing business relations?

Answer: Yes, we personally meet with business partners and clients and conduct background checks. We ensure that all our business partners have the appropriate business registration and licenses.

- ii. Carrying out transactions with non-clients?

Answer: The company has no transactions with non-clients.

- iii. Carrying out occasional transactions?

Answer: The company always conduct due diligence on the other party in relation to occasional transactions pertaining to incidental and necessary contracts arising out of business operations.

- iv. Dealing with trustee, nominee, agent, or intermediary, applying CDD not only on the latter but also on the trustors or principals?

Answer: The company does not deal with any of the above mentioned individual or entities.

- v. Dealing with juridical entities that have no business substance in their own right but through which transactions may be conducted, applying CDD on the entities' beneficial owner?

Answer: The company only deals with people or business entities with insurable interest in relation to the insurance policy.

- vi. The entity has doubts about the veracity of previously obtained customer identification document or data?

Answer: The company only deals with individuals and business entities after due diligence and after following the appropriate KYC protocols.

For each of the above, please describe in detail the CDD process and the specific provision in the MTPP that apply.

Answer: As stated.

- d. Does your entity undertake customer due diligence (CDD) measures on the beneficiary(ies) of life insurance and other investment related insurance policies? Please describe in detail the CDD process and the specific provision in the MTPP that apply.

Answer: Yes, the client is required to provide their name, date and place of birth, sex, address, contact number, citizenship, specimens signatures and (whenever applicable) the same details for the beneficiary or beneficial owner. Valid IDs for individuals and business registration documents for companies are required. The company examines the documents presented and looks for any sign of erasures, modifications or tampering. If there are any issues or concerns, the client is required to clarify or explain. The company shall courteously decline any application that does not pass KYC procedures.

- e. Explain the CDD requirements applicable to potential individual customers stating the minimum information to be obtained, IDs acceptable and its classification based on reliability, if any, and policy in updating identification information citing the specific internal policy provisions.

Answer: The company's CDD requirement is based on the established KYC procedures.

- f. Explain the CDD requirements applicable to potential customers that are juridical entities and the persons acting on their behalf such as but not limited to the President and the authorized signatory/ies stating the minimum information to be obtained, IDs acceptable and its classification based on reliability, if any, measures to prevent the unlawful use of legal persons in relation to money laundering and terrorist financing and policy in updating identification information citing the specific internal policy provisions.

Answer: In the case of juridical entities, the appropriate registration documents are secured such as the Articles of Incorporation and Partnership, General Information Sheet, Secretary Certificate or Partner's Certificate of the appointment of the representative. The representative shall likewise be evaluated and undergo KYC protocols.

- g. Does your entity identify the beneficial owner of juridical entities dealing with your entity and verify the information acquired? If yes, please describe in detail including the specific internal policy provisions.

Answer: Yes, this is identified by requiring the submission of filled up questionnaires from the client and evaluating the corporate documents previously mentioned.

- h. Does your entity verify the true identity of customers, including validating the truthfulness of the information and confirming the authenticity of the identification documents presented, submitted and provided by the customer, using reliable and

independent sources, documents, data, or information? If yes, please describe in detail including the specific internal policy provisions.

Answer: Yes, the company requires the submission of the filled up questionnaires from the client. Also, as mentioned, the company examines the documents presented and looks for any sign of erasures, modifications or tampering. If there are any issues or concerns, the client is required to clarify or explain. The company shall courteously decline any application that does not pass KYC procedures.

- i. Does your entity verify that any person purporting to act on behalf of a customer is so authorized, and identify and verify the identity of that person? If yes, please describe in detail including the specific internal policy provisions.

Answer: Yes, the company identifies the same via submission of legal documents pertaining to the authority of the representative, as mentioned - the Secretary Certificate / Board Resolution on corporations, and the Partner's Certificate / Partners' Resolution on partnerships.

- j. Does your entity identify the beneficial owner and take reasonable measures to verify the identity of the beneficial owner, using the relevant information or data obtained from reliable sources, such that the entity is satisfied that it knows who the beneficial owner is? If yes, please describe in detail including the specific internal policy provisions.

Answer: Yes, the company identifies the same via submission of legal documents pertaining to the identity of the beneficial owner. The beneficial owner is also subjected to the regular KYC protocols made on every client.

- k. Does your entity understand and, as appropriate, obtain information on, the purpose and intended nature of the account, transaction, or the business relationship with its customers? If yes, please describe in detail including the specific internal policy provisions.

Answer: Yes, the company understands the purpose and intention of the request to issue the appropriate insurance policy. This is being conducted by qualified and trained personnel. The information gathered is limited to the ensuring the identity of the individuals, entities and representatives and other appropriate and relevant information on closing their respective insurance policies.

- l. Does your entity, on the basis of materiality and risk, conduct ongoing due diligence on the business relationship of existing customers? If yes, please describe the extent scope of this obligation and indicate the specific internal policy provisions.

Answer: Yes, the business relationship of existing customers is regularly evaluated during the duration of the agreement. In the event of renewal of business relationship, the company tries to maintain updated information by requiring up to date KYC documents of the clients. Any news, information and matters pertaining to the client that affects ML and TF concerns are confronted with the clients for clarification and appropriate action.

- m. Does your entity perform enhanced due diligence for higher risk categories of customer, business relationship or transaction and does it apply to existing customers? If yes, please explain including reference to the list of customers considered as high-risk, criteria and factors considered in applying EDD, types of measures required, control mechanisms for managing the risks associated with dealing with these customers, validation procedures and the specific internal policy provisions. Also, provide number of high-risk customers per category.

Answer: Yes, the company conducts due diligence of the business relationship of existing customers with higher risk categories based on the insurance policies. In addition, the company complies with the requirements of its partner insurance principals for their underwriting assessments.

- n. Does your entity apply reduced due diligence where there is low risk of ML or TF? If yes, please explain providing details of any applicable conditions/standards and specific internal policy provisions. Is this permitted with regard to customers that are resident in another country? If yes, please explain further.

Answer: No, the company's KYC requirements are applied to all customers.

- o. What does your entity do in cases where it is unable to satisfactorily complete the CDD measures required by existing internal rules or under CL 2018-48, as amended, the AMLA, as amended, and its IRR? Please indicate the specific internal policy provisions that apply.

Answer: The company will not execute the business transaction and/or policy issuance.

- p. What are your obligations with regard to establishing business relationships with a politically exposed person, his/her immediate family relative, his/her close relationship/associates, entities related to them? Please describe the existing policies governing these arrangements, including the standard of due diligence that apply to them on account opening, control mechanisms to address the risks associated with dealing with them, and updating of identification information with references to specific internal policy provisions.

Answer: The company obligation with regards to establishing business relationships with a politically exposed person, his/her immediate family relative, his/her close relationship/associates, entities related to them is the same with all of our customers regardless of risk category.

- q. Does your entity allow non-face-to-face transactions (transactions with trustee, nominee, agent or intermediary accounts including account opening)? If yes, please explain the existing policies governing these arrangements as well as the control mechanisms to address the risks associated with this type of business relationships or transactions with references to specific internal policy provisions.

Answer: This is not applicable.

- m. Do any of your businesses make use of third parties, referral by brokers, intermediaries, fiduciaries, affiliates, subsidiaries and the like (Collectively called as third parties)? If Yes, please identify the third-parties and the due diligence undertaken on the third parties. Please also identify the business areas which make use of third parties, the approval process for introducing customers/clients, the type of relationship, and whether or not such third parties perform the CDD process that would usually be undertaken by the entity;

Answer: Yes, the company has a referral program which referrers are provided incentives. The same KYC requirements are imposed on the persons participating in the referral program and all clients closed under this system shall undergo the standard KYC protocols as well.

- n. Do you rely on third parties to perform some of the elements of the CDD process (face-to-face or gathering of the minimum information)? If yes, please explain the existing policies governing these arrangements as well as the control mechanisms to address the risks associated with this type of business relationships or transactions with references to specific internal policy provisions.

Answer: There is no reliance on third parties with regard to the company's CDD process.

- o. Are there instances where you outsource Some of the elements of the CDD process (face-to-face or gathering of the minimum information)? If yes, please explain the existing policies governing these arrangements as well as the control mechanisms to address the risks associated with this type of business relationships or transactions with references to specific internal policy provisions.

Answer: There is no reliance on third parties with regard to the company's CDD process.

- p. What are your obligations with regard to business relationships and transactions with persons (including legal persons and other financial institutions) who are nationals or citizens of foreign jurisdiction or geographical location which do not or insufficiently apply internationally accepted AML and CTF standards, as determined by relevant domestic or international bodies? Please provide the internal policy provisions, which serve as basis for these obligations.

Answer: This item is not applicable to the company.

- q. Are there measures in place to ensure that your entity is advised of concerns about weaknesses in the AML/CTF systems of other countries? If yes, please describe these measures and how these concerns are incorporated into the entity's Program.

Answer: The company has no such measure.

- r. Are there measures in place to ensure that funds collected by or transferred through non-profit organizations are not diverted to support the activities of

terrorists or terrorist organizations? If so, please specify what these measures are and indicate the specific policy provisions.

Answer: This item is not applicable to the company.

- s. What are your obligations with regard to relevant United Nations Security Council Resolutions relating to the prevention, suppression and disruption of proliferation of weapons of mass destruction and its financing? Please provide the internal policy provisions, which serve as basis for these obligations.

Answer: This item is not applicable to the company.

2. Record Keeping And Retention Process

- a. Please describe the record-keeping obligation including the type of records and information that should be maintained. Please indicate the specific internal policy provisions.

Answer: All records of all transactions especially customer identification records are maintained for five years from the date of the transactions. The Transaction documents may be retained as as original or electronic copies pursuant to the E Commerce Act. There are at least two persons responsible in the safekeeping of said records.

- b. Do you maintain all necessary records on transactions, both domestic and international and, if so, for how long following completion of the transaction? Who are the designated custodians that shall be accountable and responsible for safekeeping these documents?

Answer: Yes, we maintain all the necessary records for five years from the date of the transaction. The same period shall change upon receipt of a directive from any regulatory agency or knowledge of a particular provision that extends the period.

- c. Do you maintain records of the identification information and documents and data, account files and business correspondence and, if so, for how long following the termination of an account or business relationship?

Answer: With respect to closed accounts, the records on customer identification, account files and business correspondence shall be preserved and safely stored for at least five years from the dates when they were closed.

- d. Do you ensure that all customer and transaction records and information are available on a timely basis to competent authorities? If yes, please indicate the designated custodian that shall be accountable and responsible for safekeeping and making these records available with references to specific internal policy provisions.

Answer: Yes, the company has the obligation to ensure that all customer and transaction records and information are made available on a timely basis to competent authorities. The custodian would be the accounting and IT department.

3. Covered And Suspicious Transaction Reporting

- a. Do you have an electronic money laundering transaction monitoring system in place? If yes, is it internally developed or purchased from a vendor, and does it have the following automated functionalities?

Answer: The company has no electronic money laundering transaction monitoring system.

- i. Covered and suspicious transaction monitoring - performs statistical analysis, profiling and able to detect unusual patterns of account activity;

Answer: The company has no electronic money laundering transaction monitoring system.

- ii. Watch list monitoring checks transfer parties (originator, beneficiary, and narrative fields) and the existing customer database for any listed undesirable individual or corporation;

Answer: The company has no electronic money laundering transaction monitoring system.

- iii. Investigation - checks for given names throughout the history of payment stored in the system;

Answer: The company has no electronic money laundering transaction monitoring system.

- iv. Can generate all the CTRs of the ICREs accurately and completely with all the mandatory field properly filled up; v. Must provide a complete audit trail;

Answer: The company has no electronic money laundering transaction monitoring system.

- v. Capable of aggregating activities of a customer with multiple accounts on a consolidated basis for monitoring and reporting purposes; and

Answer: The company has no electronic money laundering transaction monitoring system.

- vi. Has the capability to record all STs and support the investigation of alerts generated by the system and brought to the attention of senior management whether or not a report was filed with the AMLC.

Answer: The company has no electronic money laundering transaction monitoring system.

- b. If no, please describe how you manually perform the functionalities mentioned above

Answer: The company relies on its internal record keeping and its insurance management system (IMS) database.

- c. Do you pay special attention to unusual transactions? If yes, how do you define unusual transactions? And what type of special measures do you implement in managing them? Please indicate the specific internal policy provisions for this requirement.

Answer: The company pays attention to suspicious transactions particularly during claim settlement procedures. The company takes into account that these transactions are transactions, regardless of the amount where any of the following exists: there is no underlying legal obligation or purpose or economic justification; the client is not properly identified; the amount is not commensurate with the business or financial capacity of the client; it may be perceived that the client's transaction is structured in order to avoid being the subject of reporting requirements under the law; the transaction is in any way related to an unlawful activity or offence punishable under the law; and any similar transaction.

- d. Are you required to report to the AMLC a suspicious transaction report (STR), when you suspect or have reasonable grounds to suspect that funds are the proceeds of a criminal activity? Please describe the scope of the obligation, the decision process and the decision maker within the entity (whether or not to file an STR) with references to the specific internal policy provisions that mandate reporting.

Answer: Yes, as soon as it is suspected to be under the above grounds the same is reported to the Compliance Officer and/or General Manager. In turn the GM reports the same to the Senior Management through the President or CEO. The Senior Management then directs the appropriate action be done, including but not limited to the appropriate reporting to regulatory agencies. He is also under obligation to report all action to the Board of Directors immediately upon receipt of said information.

- e. Does the obligation to make an STR also apply when you suspect or have reasonable grounds to suspect that funds are related to terrorism? If yes please describe the scope of this obligation, the decision process and the decision maker within the entity (whether or not to file an STR) with reference to the specific internal policy provisions that mandate reporting.

Answer: Yes, as soon as there is a reasonable ground to believe that funds are the proceeds of terrorism. The same protocol shall apply with respect to both funds pertaining to money laundering activities or terrorist financing activities.

- f. Other than the 6 specified circumstances for filing an STR, what other instances do you report an STR or an alert has been tagged using the last item- any transaction that is similar or analogous to any of the foregoing, i.e. tax evasion, malversation of public funds, bribery, etc?

Answer: The company also takes note of the other unlawful activities or predicate offenses under the Anti Money Laundering Act, such as but not limited to kidnapping for ransom, Anti Graft and Corrupt Practices Act, Plunder, Smuggling, Tax Evasion, Drug related offenses, and other identified crimes thereon.

- g. What is the legal protection against potential liability available to your officers and/or staff who report their suspicion in accordance with the legal obligation to report? Please describe, by reference to the specific internal policy provisions, the scope of the protection in terms of who would benefit from it and the types of liability against which it is available.

Answer: The company shall ensure that the responsible officer reporting thereon protected from any suit or prejudice. The company, under its Manual on Corporate Governance, has a whistleblower policy that protects the confidentiality and rights of the whistleblower. Under the same, the Board upon receiving the information shall ensure anonymity and confidentiality; the Board shall likewise ensure that the whistleblower shall not be prejudiced or discriminated against after the fact. This is to ensure that the employee reports any matter that pertains to violation of sexual harassment laws, graft and corrupt practices act, money laundering, and other criminal violations.

- h. Do you prohibit your officers and staff from disclosing ("tipping off) to any person the fact that an STR, CTR or related information is being reported or provided to the AMLC? If they are, please describe the scope of this prohibition by reference to the specific internal policy provisions.

Answer: The company does not prohibit the same, and actually encourages its officers and employee to report any and all unusual transactions.

4. Employment And Training Program

- a. Please indicate the standards that apply when hiring new staff to the Compliance Office, the Internal Audit and the entity as a whole?

Answer: All applicants undergo initial examination and screening as well series of interviews from supervisory level up to the President to ensure the high standards when recruiting employees. All potential applicants are required to provide their basic information to ensure that the company knows its employee (KYE). The Human Resource Manager is the one responsible in screening the candidates for employment using valid and reliable measures and procedures.

- b. Please describe the entity's AML training and refresher program with specific references to the level of training and focus on the participant, the Office tasked to implement the program, the financial, human and technical support that that Office has been given and frequency of offering.

Answer: The Compliance Officer in coordination with the Human Resource group shall be required to conduct a basic anti money laundering training to all employees. The basic aim is for all employees to be aware of the Anti Money Laundering Act as well as the company policies and procedures that affect the same. All new employees are required to undergo this training and all other employees shall be required to participate in refresher courses every 3 years. The training shall be in the form of asynchronous learning modules, e learning modular workshops, home study and surveys and/or formal meetings with the Compliance group.

- c. Are the staffs of the Compliance Office and Internal Audit Office provided with training for combating money laundering and terrorist financing that is different from the staff of other offices? Please give details.

Answer: The company due to its small number of employees is envisioned to have the same training modules.

- d. Do you have an on-going employee training on AML and CTF? if yes, please indicate the last employee training on AML and CTF and the schedule for the year as well as the specific policy provisions for this requirement.

Answer: The company has yet to implement the same.

C. INTERNAL CONTROLS AND AUDIT

1. What is the structure of the Internal Audit Office including the financial, human and technical resources, delegated authorities, reporting and communication line, duties and responsibilities of the Office as a whole and of individual officers and staff together with their qualification and experiences as well as standards in hiring new staff, and control mechanisms of the Office in ensuring that the pre-set objectives are adhered by responsible officers and staff in the different Department, Groups, Units and/or Branches?

Answer: Due to the size of the company, the internal audit office is composed of the internal audit officer and the internal audit associate.

2. Do you establish and maintain internal procedures, policies and controls to prevent ML and TF? How do you communicate these to the officer, staff and employees? Please provide details with reference to the applicable policy provisions.

Answer: The Internal Audit reports any of their findings to the Audit Committee directly, or the Compliance Officer which in turn reports to the Senior Management (President / General Manager) and/or the Risk and Corporate Governance Committee. The Internal Audit should prepare the report with all supporting documents for investigation and evaluation.

3. Do you maintain an adequately resourced and independent audit function that tests compliance with these procedures, policies and controls? If yes, please indicate the

available resources, financial, human, and technical and the specific policy provisions for this requirement.

Answer: The company has good reason to believe that its Internal Audit together with its CPA Independent Director has the capacity to monitor and evaluate the compliance with all appropriate procedures, policies and controls pertaining to ML and TF activities.

D. IMPLEMENTATION

1. Covered And Suspicious Transaction Reporting Policies And Procedures

- a. Do you have an electronic money laundering transaction monitoring system in place? If yes, is it internally developed or purchased from a vendor, and does it have the following automated functionalities?

Answer: The company does not have an electronic money laundering transaction monitoring system.

- i. Covered and suspicious transaction monitoring - performs statistical analysis, profiling and able to detect unusual patterns of account activity;

Answer: The company does not have an electronic money laundering transaction monitoring system.

- ii. Watch list monitoring checks transfer parties (originator, beneficiary, and narrative fields) and the existing customer database for any listed undesirable individual or corporation;

Answer: The company does not have an electronic money laundering transaction monitoring system.

- iii. investigation - checks for given names throughout the history of payment stored in the system;

Answer: The company does not have an electronic money laundering transaction monitoring system.

- iv. Can generate all the CTRs of the ICREs accurately and completely with all the mandatory field properly filled up;

Answer: The company does not have an electronic money laundering transaction monitoring system.

- v. Must provide a complete audit trail;

Answer: The company does not have an electronic money laundering transaction monitoring system.

- vi. Capable of aggregating activities of a customer with multiple accounts on a consolidated basis for monitoring and reporting purposes; and

Answer: The company does not have an electronic money laundering transaction monitoring system.

- vii. Has the capability to record all STs and support the investigation of alerts generated by the system and brought to the attention of senior management whether or not a report was filed with the AMLC.

Answer: The company does not have an electronic money laundering transaction monitoring system.

- b. If no, please describe how you manually perform the functionalities mentioned above

Answer: The company relies on its internal record keeping and its insurance management system (IMS) database.

- c. Do you pay special attention to unusual transactions? What type of special measures do you implement in managing them?

Answer: The company pays attention to suspicious transactions particularly during claim settlement procedures. The company takes into account that these transactions are transactions, regardless of the amount where any of the following exists: there is no underlying legal obligation or purpose or economic justification; the client is not properly identified; the amount is not commensurate with the business or financial capacity of the client; it may be perceived that the client's transaction is structured in order to avoid being the subject of reporting requirements under the law; the transaction is in any way related to an unlawful activity or offence punishable under the law; and any similar transaction.

- d. Are you required to report to the AMLC a suspicious transaction report (STR) when you suspect or have reasonable grounds to suspect that funds are the proceeds of a criminal activity? Please describe the scope of the obligation, the decision process and the decision maker within the entity (whether or not to file an STR).

Answer: Yes, as soon as it is suspected to be under the above grounds the same is reported to the Compliance Officer and/or General Manager. In turn the GM reports the same to the Senior Management through the President or CEO. The Senior Management then directs the appropriate action be done, including but not limited to the appropriate reporting to regulatory agencies. He is also under obligation to report all action to the Board of Directors immediately upon receipt of said information.

- e. Does the obligation to make an STR also apply when you suspect or have reasonable grounds to suspect that funds are related to terrorism? If yes please

describe the scope of this obligation, the decision process and the decision maker within the entity.

Answer: Yes, as soon as there is a reasonable ground to believe that funds are the proceeds of terrorism. The same protocol shall apply with respect to both funds pertaining to money laundering activities or terrorist financing activities.

- f. Other than the 6 specified circumstances for filing an STR, what other instances do you report an STR or an alert has been tagged using the last Item- any transaction that is similar or analogous to any of the foregoing, i.e. tax evasion, malversation of public funds, bribery, etc?

Answer: The company also takes note of the other unlawful activities or predicate offenses under the Anti Money Laundering Act, such as but not limited to kidnapping for ransom, Anti Graft and Corrupt Practices Act, Plunder, Smuggling, Tax Evasion, Drug related offenses, and other identified crimes thereon.

- g. What is the legal protection against potential liability available to your officers and/or staff who report their suspicion in accordance with the legal obligation to report?

Answer: The company shall ensure that the responsible officer reporting thereon protected from any suit or prejudice. The company, under its Manual on Corporate Governance, has a whistleblower policy that protects the confidentiality and rights of the whistleblower. Under the same, the Board upon receiving the information shall ensure anonymity and confidentiality; the Board shall likewise ensure that the whistleblower shall not be prejudiced or discriminated against after the fact. This is to ensure that the employee reports any matter that pertains to violation of sexual harassment laws, graft and corrupt practices act, money laundering, and other criminal violations.

- h. Does the Compliance Office keep annual statistics on red flags systems alerts, ML investigations, CT reports, ST reports broken down as to the nature? Please provide copies of the statistics.

Answer: The company has not encounter such alerts and reports, to date. Nonetheless, the company is under obligation to keep the same in the event that the company encounters such issues and alerts.

- i. Does the Compliance Office keep track dispositions of red flag systems alerts? Please provide copies of the tracking report.

Answer: There is currently no available information in relation to this as the company has not yet encountered any alerts and reports.

- j. Do you prohibit your officers and staff from disclosing ("tipping off") to any person the fact that an STR, CTR or related information is being reported or provided to the AMLC?

Answer: The company does not prohibit the same, and actually encourages its officers and employee to report any and all unusual transactions.

2. Risk Based And Tiered Customer Acceptance, Identification, Verification And Ongoing Monitoring Policies And Procedures

- a. Does your entity undertake customer due diligence (CDD) measures when:
- i. establishing business relations?

Answer: Yes, we personally meet with business partners and clients and conduct background checks. We ensure that all our business partners have the appropriate business registration and licenses.

- ii. carrying out transactions with non-clients?

Answer: The company has no transactions with non-clients.

- iii. carrying out occasional transactions?

Answer: The company always conduct due diligence on the other party in relation to occasional transactions pertaining to incidental and necessary contracts arising out of business operations.

- iv. dealing with trustee, nominee, agent, or intermediary, applying CDD not only on the latter but also on the trustors or principals?

Answer: The company does not deal with any of the above mentioned individual or entities.

- v. dealing with juridical entities that have no business substance in their own right but through which financial transactions may be conducted, applying CDD on the entities'beneficial owner?

Answer: The company only deals with people or business entities with insurable interest in relation to the insurance policy.

- vi. the entity has doubts about the veracity of previously obtained customer identification document or data?

Answer: The company only deals with individuals and business entities after due diligence and after following the appropriate KYC protocols.

- b. Does your entity undertake customer due diligence (CDD) measures on the beneficiary(ies) of life insurance and other investment related insurance policies?

Answer: Yes, the client is required to provide their name, date and place of birth, sex, address, contact number, citizenship, specimens signatures and (whenever applicable) the same details for the beneficiary or beneficial owner. Valid IDs for individuals and business registration documents for companies are required. The company examines the documents presented and looks for any sign of erasures, modifications or tampering. If there are any issues or concerns, the client is required to clarify or explain. The company shall courteously decline any application that does not pass KYC procedures.

- c. Does your entity identify the beneficial owner of juridical entities dealing with the entity and verify the information acquired?

Answer: Yes, the company identifies the same and verifies the information.

- d. Does your entity verify the true identity of customers, including validating the truthfulness of the information and confirming the authenticity of the identification documents presented, submitted and provided by the customer, using reliable and independent sources, documents, data, or information?

Answer: Yes, the company identifies the same and validates it using the standard protocols.

- e. Does your entity verify that any person purporting to act on behalf of a customer is so authorized, and identify and verify the identity of that person?

Answer: Yes, the company identifies the same via submission of legal documents pertaining to the authority of the representative, as mentioned - the Secretary Certificate / Board Resolution on corporations, and the Partner's Certificate / Partners' Resolution on partnerships.

- f. Does your entity identify the beneficial owner and take reasonable measures to verify the identity of the beneficial owner, using the relevant information or data obtained from a reliable sources, such that the entity is satisfied that it knows who the beneficial owner is?

Answer: Yes, the company identifies the same via submission of legal documents pertaining to the identity of the beneficial owner. The beneficial owner is also subjected to the regular KYC protocols made on every client.

- g. Does your entity understand and, as appropriate, obtain information on, the purpose and intended nature of the account, transaction, or the business relationship with its customers?

Answer: Yes, the company understands the purpose and intention of the request to issue the appropriate insurance policy. This is being conducted by qualified and trained personnel. The information gathered is limited to the ensuring the identity of the individuals, entities and representatives and other appropriate and relevant information on closing their respective insurance policies.

h. Does your entity, on the basis of materiality and risk, conduct ongoing due diligence on the business relationship of existing customers?

Answer: Yes, the company conducts the required due diligence.

i. Does your entity perform enhanced due diligence for higher risk categories of customer, business relationship or transaction and does it apply to existing customers?

Answer: Yes, the company conducts the required due diligence for these people.

j. Does your entity apply reduced due diligence where there is low risk of ML or TF? What does your entity do in cases where it is unable to complete the CDD measures required by existing internal rules or under CL 2018-48, as amended, the AMLA, as amended, and its IRR?

Answer: No, the company's KYC requirements is applied to all customers.

k. What does your entity do in cases where it is unable to complete the CDD measures required by existing internal rules or under the CL 2018-48, as amended, the AMLA, as amended, and its IRR? In case of non-face-to-face services, does the entity ensure that control measures to address risks associated with this type of business relationships or transactions are implemented?

Answer: The company will not execute the business transaction and/or policy issuance.

3. Record-Keeping And Retention Policies And Procedures

a. What are the type of records and information that your entity maintains?

Answer: The company maintains all its business transaction records, such as invoices and insurance policies and all relevant documents pertaining thereto.

b. Do you maintain all necessary records on transactions and, if so, for how long following completion of the transaction? Who is/are the designated custodian that shall be accountable and responsible for safekeeping these documents?

Answer: Yes, we maintain all the necessary records for five years from the date of the transaction. The same period shall change upon receipt of a directive from any regulatory agency or knowledge of a particular provision that extends the period.

c. Do you maintain records of the identification documents and information, account files and business correspondence and, if so, for how long following the termination of an account or business relationship?

Answer: With respect to closed accounts, the records on customer identification, account files and business correspondence shall be preserved and safely stored for at least five years from the dates when they were closed.

- d. Do you ensure that all customer and transaction records and information are available on a timely basis to competent authorities? If yes, please indicate the designated custodian that shall be accountable and responsible for safekeeping and making these records available.

Answer: Yes, the company has the obligation to ensure that all customer and transaction records and information are made available on a timely basis to competent authorities. The custodian would be the accounting and IT department.

- e. Do you conduct compliance testing to ensure that all units and/or branches maintain and safely store KYC and transaction records?

Answer: The company does not have any units or branches.

- f. Does the Internal Audit cover an assessment of compliance of the record-keeping and retention process?

Answer: Yes, the internal audit assesses compliance of the record keeping process in cooperation and coordination with accounting and IT department.

4. Continuing Education And Training Program

- a. Are newly hired employees required to attend AML and CTF training?

Answer: All applicants undergo initial examination and screening as well series of interviews from supervisory level up to the President to ensure the high standards when recruiting employees. All potential applicants are required to provide their basic information to ensure that the company knows its employee (KYE). The Human Resource Manager is the one responsible in screening the candidates for employment using valid and reliable measures and procedures.

- b. Is there an existing training and refresher program for all responsible directors, officers and staff? Please provide a copy of the program.

Answer: The program is still in the process of development and improvement.

- c. Are the staffs of the Compliance Office and Internal Audit Office provided with training for combating money laundering and terrorist financing that is different from the staff of other offices?

Answer: The training program, considering the small number of employees, will be standard across the board.

- d. Do you have an on-going director and employee training on ML and TF prevention?
If yes, please indicate the last training and the schedule for the year.

Answer: The company has yet to conducts a formal training with respect thereto.

- e. Do you conduct a regular post-test on directors and employees to gauge their understanding of AMI-A, as amended, its IRR, CL 2018-48, as amended, and other IC and AMLC relevant regulations?

Answer: The company has yet to conducts a formal training with respect thereto.

- f. Provide statistics on education and training provided to responsible directors, officers and employees covering the immediately preceding year

Classification (e.g new employees; regular employees; board of directors; agents; officers; etc.)	Total Number Per Classification	Number of Training Hours	Date of Training	Number of directors, officers and employees who completed the training
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Answer: The company has yet to conducts a formal training with respect thereto.

E. ICRE DATA INFORMATION

1. Provide information on the total asset of the entity as of 31 December of the immediately preceding year.

Answer: The company's total assets as of December 31, 2020 is Php395,287,201.00

2. Provide a list of all products being offered/sold according to classification by the ICRE.

Answer: The company's offered products are listed as follows:

- i. MotorCar
- ii. Loan Redemption - PA
- iii. HMO
- iv. Property Floater - Quarry
- v. HMO with PA
- vi. Property Floater - Non Quarry
- vii. PA PAMI
- viii. Pre Need Memorial
- ix. Fire and Lightning
- x. PA Group
- xi. PAMI - TPL
- xii. PA Individual
- xiii. MSPR
- xiv. Home Insurance
- xv. Marine Cargo
- xvi. Bond Surety
- xvii. Fire and Lightning Only

- xviii. Fidelity Guarantee
- xix. PA Student
- xx. Comp. General Liability
- xxi. Condo Insurance
- xxii. CTPL
- xxiii. PA Individual (micro)
- xxiv. iMarket Property
- xxv. Motor Car - BI / PD Only
- xxvi. Business Insurance
- xxvii. D&O LIABILITY
- xxviii. Warranty Bond
- xxix. Medicash1 - Dengue
- xxx. Engineering - EEI
- xxxi. Property Floater
- xxxii. Group Credit Life
- xxxiii. PA Individual
- xxxiv. Bond Performance
- xxxv. Group Life
- xxxvi. PA Auto
- xxxvii. PA Travel
- xxxviii. Cellphone Insurance
- xxxix. Medicash2 - Leptospirosis
- xl. Pre Need Memorial - Fixed
- xli. Terrorism and Sabotage
- xlii. Professional Indemnity Insurance
- xliii. Golfers Compre Liability
- xliv. Cyber Insurance
- xlv. Marine Inland
- xlvi. MCI Errors and Omission
- xlvi. CAMCI - Fixed Income Fund
- xlvi. CAMCI - United Fund
- xlix. Aviation

3. Provide data/information on products covering the immediately preceding year.

Product Classification	Total Premium/ Contract Price/ Membership Fees Received	Number of Issued or Sold Policies/Pre-Need Plans/ HMO Agreements	Number Outstanding Policies/ Pre-HMO Agreements	Number of Policies/ Pre-Need Plans/ Agreements Surrendered/ Cancelled/ Lapsed
Policies – Life and Non-Life	Php 327,538,095	16,385	0	160
Pre-Need	Php 756,725	15	0	5
HMO	Php 3,569,514	75	0	0

4. Provide number of suspicious and covered transactions reported to AMLC covering the immediately preceding year.

Type of Report	Number of Reports Submitted
Suspicious Transaction Reports	
Covered Transaction Reports	

Answer: There are no suspicious transactions or covered transactions, to date.

CERTIFICATION

The undersigned President and AML and CTF Compliance Officer of the company certify that the responses and explanations set forth in the above AML and CTF Compliance Questionnaire are true, complete and correct of our own personal knowledge and/or based on authentic records.

Signed in the City of CITY OF MANILA on the 29 JUL 2021 of _____ 20____

ROLANDO PIERRE A. VALENCIANO

PRESIDENT

Signature over printed name

ROLANDO PIERRE A. VALENCIANO

AML AND CTF COMPLIANCE OFFICER

Signature over printed name

29 JUL 2021
SUBSCRIBED AND SWORN to before me this _____ of _____, 20____, by the following who are all personally known to me (or whom I have identified through competent evidence of identity) and who exhibited to me their respective identification document as follows:

NAME	ID NO.	DATE/PLACE ISSUED
1 ROLANDO PIERRE A. VALENCIANO	N10-83-012824	March 2018 / Manila

2 ----- nothing follows-----

Doc. No. 36
Page No. 12
Book No. 13
Series of 20

NOTARY PUBLIC **MAR T. ANG**
Notary Public for Manila
Notarist Commission No. 1
2/F Malabon Place Hotel, Alameda St., Manila
ID No. 624670 Issued on Dec. 14, 2020 Until Dec. 31, 2021 Pasig City
PTA No. 9221011 Issued on Jan. 6, 2021 Until Dec. 31, 2021 Manila
CUL No. 99751 Issued on May 29, 2017
MFP No. 12-000710 Issued on Jan. 24, 2012 Valid until April 14, 2022