

COMPANY NAME : SUN LIFE OF CANADA (PHILIPPINES), INC. (SLOCPI)
 COMPANY STRUCTURE : CLASS 1
 FINANCIAL YEAR END : 2018
 SECTOR : INSURANCE (Life)

C. Role of Stakeholders			
	SCORECARD ITEM	Y/ N	Reference / Source document
C.1	The rights of the stakeholders that are established by law or through mutual agreements are to be respected		
	<i>Does the company disclose a policy that :</i>		
C.1.1	<p>Stipulates the existence and scope of the company's efforts to address customers' welfare?</p> <p>OECD Principle IV (A): 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>Global Reporting Initiative: Sustainability Report (C1.1 - C.15) International Accounting Standards 1: Presentation of Financial Statements</p>	Y	<p>1) The 2018 Sustainability Report contains and manifests Sun Life's commitment to serving and protecting its customer's welfare.</p> <p><i>"Client Focus</i> <i>Our Clients are at the centre of everything we do. We are focused on building lasting relationships and delivering on our Purpose, which we believe will allow us to provide better value and service to our Clients, and lead to better business outcomes for Sun Life.</i></p> <p>OUR APPROACH <i>Putting our Clients at the centre of all we do means listening to them and understanding what they need from us at every touchpoint. It's not just about selling insurance or benefits. It's about delivering the best outcomes for our Clients.</i> <i>Our Client-centric strategy means we're working harder than ever to ensure we're modernizing and humanizing our brand, while maintaining our core attributes of being a caring, optimistic and relevant company. The strategy is centered on three themes that reflect our Client focus:</i></p> <p>1) Easy to do business with <i>We are committed to being an easier company to do business with, by making insurance more accessible, by helping our Clients make informed decisions and by simplifying our communications and processes.</i></p> <p>2) Proactive contact <i>We have amplified our efforts to increase and personalize Client outreach so that we listen to and interact with Clients more often. To tailor their experience with us, we reach out in ways that make the most sense to</i></p>

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			<p>each Client, whether that's through an advisor or by phone, email, text or social media.</p> <p>3) Problem resolution <i>We have heightened our attention to the way we handle concerns or problems, viewing these as opportunities to create positive experiences through prompt, Client-minded solutions.</i></p> <p><i>Measuring the Client Experience</i> <i>We measure our success in delivering a great Client experience through a combination of metrics:</i></p> <p>Our Client Index – <i>to gauge our service delivery performance. This proprietary measurement was developed using Client ratings from a variety of Client service channels. It has been in place since 2016, providing valuable historical data and insights that continue to sharpen our focus on performance and measurable outcomes.</i></p> <p>The Net Promoter Score® – <i>a globally recognized methodology that measures customer experience and the likelihood that a Client will continue doing business with us.</i></p> <p>Other performance measures – <i>each business has additional Client focus metrics to guide performance.</i></p> <p><i>25% of our annual incentive compensation is determined by success on these Client-related metrics. “</i></p> <p><i>1Net Promoter, Net Promoter System, Net Promoter Score, NPS and the NPS-related emoticons are registered trademarks of NICE Systems, Inc., Bain & Company, Inc., and Fred Reichheld.</i></p> <p><u>Sustainability Report/ Client Focus (Page 11)</u> https://cdn.sunlife.com/static/ph/About%20us/Corporate%20Governance/Sustainability_Report_2018.pdf</p> <p>2) Sustainability Principles</p> <p><i>“Sun Life’s focus on advancing sustainability is a key strategy and differentiator for us. Endorsed by Sun Life’s Board of Directors, our</i></p>

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			<p>sustainability strategy is anchored on four principles: organizational resilience, environmental responsibility, community wellness, and governance and risk management. The strategy reflects input from external and internal stakeholders and is aligned with our company Purpose and strategic areas of focus (Client Distribution Excellence Digital, Data & Analytics Financial Discipline Talent and Culture)".</p> <ul style="list-style-type: none"> • "Organizational Resilience <p><i>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."</i></p> <p>Data Privacy and Security</p> <p>Sun Life's business is dependent on maintaining a secure, confidential environment for Clients, Employees and other partners' information. Data Security and privacy are becoming more increasingly important as Sun Life depends more and more on mobile technologies to conduct business and bring solutions to Clients who entrust their data.</p> <p>Sun Life Online Privacy Statement https://www.sunlife.com.ph/PH/About+us/Corporate+governance/Online+privacy+statement?vgnLocale=en_CA</p> <p>Client Complaint and Feedback</p> <p>As a policy, crucial to the very foundation of SLOCPI's relationship with its stakeholders i.e., - TRUST, the Company puts its CLIENTS FIRST. 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</p>

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			<p>complaints or feedback, is given importance through the observance of turn-around-time and resolution of their issues.</p> <p>Complaints Handling Manual https://cdn.sunlife.com/static/ph/About%20us/Corporate%20Governance/Complaints%20Handling%20Manual%20v%205.5%20%2001.30.2019.pdf</p> <ul style="list-style-type: none"> • “Environmental Responsibility <p><i>We are accountable for the impact of our operations on the environment, so we are consistently taking steps to measure, manage and reduce that impact.”</i></p> <p>“Green bond investments support climate-smart projects in Asia</p> <p><i>2018 was a milestone year for Sun Life Philippines, marking its foray into green bonds to support sustainability projects. The company purchased: The International Finance Corp’s Green Bonds, the first of its kind in the Philippines. The proceeds of this issuance are being directed to renewable energy, energy efficiency and other climate-smart projects. Green bonds issued by Sindicatum Renewable Energy Company, a renewable energy developer and advocate of sustainable climate projects. Funds raised will support eligible clean energy projects in the Philippines. “</i></p> <p>2018 Sustainability Report (Page 32) https://cdn.sunlife.com/static/ph/About%20us/Corporate%20Governance/Sustainability_Report_2018.pdf</p> <p>The Sun Life Building http://sunlifebuilding-phil.com/index.html</p> <p>Sun Life named one of the 2019 Global 100 Most Sustainable Corporations in the World</p>

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			<p>https://www.sunlife.ca/ca/About+us/Achievements?vgnLocale=en_CA</p> <ul style="list-style-type: none"> • “Community Wellness <p><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 Governance and Risk Management.”</i></p> <p>Sun Life Foundation, Bantay Kalikasan Tie up for Eco-tourism Project</p> <p>Sun Life Foundation, the philanthropy arm of Sun Life Financial Philippines, joins hands with Bantay Kalikasan, the environmental arm of ABS-CBN Lingkod Kapamilya Foundation, for the construction of the Panganiban Mangrove Forest Boardwalk in Gubat, Sorsogon to promote environmental sustainability while boosting income generation for the locals.</p> <p>https://www.sunlife.com.ph/PH/About+us/Newsroom/Press+release/2019/+Sun+Life+Foundation,+Bantay+Kalikasan+Tie+up+for+Eco-tourism+Project?vgnLocale=en_CA</p> <p>Sun Life Foundation concludes Project 120 Classrooms on a high note</p> <p>Sun Life Financial-Philippines Foundation, Inc., in partnership with Children’s Hour, has successfully concluded Project 120 Classrooms, an initiative that aims to build 120 classrooms in areas that were heavily hit by natural calamities.</p> <p>https://www.sunlife.com.ph/PH/About+us/Newsroom/Press+release/2019/Sun+Life+Foundation+concludes+Project+120+Classrooms+on+a+high+note?vgnLocale=en_CA</p> <p>Go Well</p> <p>Sun Life’s advocacy goes beyond financial well-being. It also extends to helping Filipinos become physically fit. Its new campaign</p>

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			<p>called '<u>GoWell</u>,' provides members the opportunity to learn how to keep healthy and fit through various means such as workouts, trainings, fitness classes, and more.</p> <p>https://www.gowell.com.ph/</p> <ul style="list-style-type: none"> • <i>“Governance and Risk Management</i> <p><i>A well-run organization contributes to a stable operating platform for the Company, and positions us to meet our obligations to stakeholders. Pro-active risk management and an embedded risk culture are essential to our long-term success.”</i></p> <p><u>2018 Annual Report/Board of Director and Credentials, Page 12-18</u> <u>2018 Annual Report/ Corporate Governance, Page 43</u> <u>2018 Annual Report/Philippine Leadership Team and Board Appointed Officers (Pages 19-22)</u> https://cdn.sunlife.com/static/ph/About%20us/Corporate%20Governance/SunLife_AR_2019.pdf</p>
C.1.2	Explains supplier/contractor selection practice?	Y	<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 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> <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>

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			<p>2. <i>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>2.1 <i>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> <p>2.2 <i>Supplier with adequate financial strength who also have a reputation for adhering to specifications and delivery schedules.</i></p> <p>3. <i>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>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</i></p>

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			<p><i>(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. 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>Our Website also provides the following information regarding our Policy on Sustainability and Competing Fairly and Openly:</p> <p>Sustainability</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</i></p>

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			<p><i>to improve the sustainability of our business practices, please submit them to the Sustainability Program on The Source.”</i></p> <p>Competing Fairly and Openly</p> <p><i>“One of our obligations as an ethical company is to support our industry and encourage fair competition. Although we compete vigorously in every market in which we participate, we are committed to conducting business in compliance with all competition or antitrust laws. As specific prohibitions imposed by these laws vary, competing fairly and ethically in all our business activities is the most effective way to avoid contravening these rules.</i></p> <p><i>Antitrust or competition laws prohibit Sun Life from engaging in activities intended to lessen competition. This means we cannot make agreements with competitors to fix prices or allocate sales, customers or territories. We may also not discuss with outsiders strategic information on topics such as pricing, product development and customer lists. Even if we do not intend these discussions to result in actions that restrict competition, they could be interpreted that way, and could be illegal whether or not they lead to a restriction of competition.</i></p> <p>Source Documents:</p> <p><u>Policy on Supplier Accreditation and Performance Evaluation</u> https://cdn.sunlife.com/static/ph/About%20us/Corporate%20Governance/C.1.2%20Policy%20on%20Supplier%20Accreditation%20and%20Performance%20Evaluation%20(1).pdf</p> <p><u>Code of Business Conduct (Page 19)</u> https://cdn.sunlife.com/static/ph/About%20us/Corporate%20Governance/Code%20of%20Business%20Conduct.pdf</p> <p><u>SLOCPI Website/Company Policies / Competing and Openly</u> https://www.sunlife.com.ph/PH/About+us/Corporate+governance/Company+policies?vgnLocale=en_CA</p>

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C.1.3	Describes the company's efforts to ensure that its value chain is environmentally friendly or is consistent with promoting sustainable development?	Y	<p>The consolidated Report of Sun Life and the efforts in the Philippines are included in the 2018 Sustainability Report.</p> <p>“Our Sustainability Strategy</p> <p><i>Sun Life’s focus on advancing sustainability is a key strategy and differentiator for us. Endorsed by Sun Life’s Board of Directors, our sustainability strategy is anchored on four principles: organizational resilience, environmental responsibility, community wellness, and governance and risk management. The strategy reflects input from external and internal stakeholders and is aligned with our company Purpose and strategic areas of focus (Client Distribution Excellence Digital, Data & Analytics Financial Discipline Talent and Culture)”.</i></p> <p>Sustainability Principles:</p> <ul style="list-style-type: none"> • “Organizational Resilience <i>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.”</i> • Environmental Responsibility <i>We are accountable for the impact of our operations on the environment, so we are consistently taking steps to measure, manage and reduce that impact.</i> • Community Wellness <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 Governance and Risk Management.</i> • Governance and Risk Management <i>A well-run organization contributes to a stable operating platform for the Company, and positions us to meet our obligations to stakeholders. Pro-active risk management and an embedded risk culture are essential to our long-term success.”</i>

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			<p>Sun Life’s commitment to the Principle of Sustainability is also discussed in its Code of Business Conduct:</p> <p>Sustainability</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>The following are a few of Sun Life’s activities that show its commitment to promote sustainability:</p> <ul style="list-style-type: none"> • Organizational Resilience <i>Client Focus, Digital Innovation, Data Security and Privacy, Talent Management, Workforce Wellness and Diversity and Inclusion</i> <p>1) Data Privacy and Security</p> <p>Sun Life’s business is dependent on maintaining a secure, confidential environment for Clients, Employees and other partners’ information. Data Security and privacy are becoming more increasingly important as Sun Life depends more and more on mobile technologies to conduct business and bring solutions to Clients who entrust their data.</p> <p><u>Sun Life’s Online Privacy Policy Statement</u></p>

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			<p>https://www.sunlife.com.ph/PH/About+us/Corporate+governance/Online+privacy+statement?vgnLocale=en_CA</p> <p>2) Client Concerns and Feedback</p> <p>As a policy, crucial to the very foundation of SLOCPI’s relationship with its stakeholders i.e., - TRUST, the Company puts its CLIENTS FIRST. 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, is given importance through the observance of turn-around-time and resolution of their issues.</p> <p><u>Complaints Handling Manual</u> https://cdn.sunlife.com/static/ph/About%20us/Corporate%20Governance/Complaints%20Handling%20Manual%20v%205.5%20%2001.30.2019.pdf</p> <p>Contact US https://www.sunlife.com.ph/PH/About+us/Contact+us?vgnLocale=en_CA</p> <p>3) Sun Life becomes the first insurer in the Philippines to partner with Lazada to help make insurance more accessible</p> <p>https://www.sunlife.com.ph/PH/About+us/Newsroom/Press+release/2018/Sun+Life+Financial+and+Lazada+sign+innovative+deal?vgnLocale=en_CA</p> <p>4) Sun Life launches product for a healthy and worry-free retirement</p>

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			<p>https://www.sunlife.com.ph/PH/About+us/Newsroom/Press+release/2018/Sun+Life+launches+product+for+a+healthy+and+worry-free+retirement?vgnLocale=en_CA</p> <p>5) Sun Life marks new ranking in Top 100 PH brands</p> <p>SUN LIFE Financial Philippines, Inc. marked its highest ranking so far in the Campaign Asia Pacific’s Top 100 Brands in the Philippines.</p> <p>https://www.sunstar.com.ph/article/1758470</p> <p>6) Sun Life launches product for a healthy and worry-free retirement</p> <p>https://www.sunlife.com.ph/PH/About+us/Newsroom/Press+release/2018/Sun+Life+launches+product+for+a+healthy+and+worry-free+retirement?vgnLocale=en_CA</p> <p>7) Start an exceptional career with Sun Life</p> <p>Sun Life provides continuous training, global exposure, development and cross-posting opportunities, and a healthy work-life balance.</p> <p>As a strong financial services company with a rich and progressive history, SLF is anchored on the values of integrity, excellence, customer focus, engagement, and value.</p> <p>Our Training https://www.sunlife.com.ph/PH/About+us/Become+an+employee/Our+rewards+and+benefits?vgnLocale=en_CA</p> <p>Our Rewards https://www.sunlife.com.ph/PH/About+us/Become+an+employee/Our+rewards+and+benefits?vgnLocale=en_CA</p> <p>Our Culture</p>

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			<p>https://www.sunlife.com.ph/PH/About+us/Become+an+employee/Our+culture?vgnLocale=en_CA</p> <p>8) Employee Activities</p> <p>Chinese New Year Festivities https://www.instagram.com/p/BtcfJqvH1XB/?igshid=xehyb1lzd7yi Sun Life Resolution Run https://www.instagram.com/p/BtE9ieAHKOK/?igshid=4f53vempmg34 Sun Life Kick Off – Attended by Employees and Advisors https://www.instagram.com/p/BIM1ZdOBUcg/?igshid=f3h0t8alrel</p> <p>9) Sun Life takes no. 1 spot for 8th year in a row</p> <p>For the eighth year in a row, Sun Life of Canada (Philippines), Inc. (“Sun Life”) was once again named the No. 1 life insurance company in the Philippines. According to a report released by the Insurance Commission, Sun Life bested other companies in terms of premium income, as it garnered P37.39 billion in 2018. The company also led in in new business annual premium equivalent, which amounted to P8.22 billion.</p> <p>https://www.sunlife.com.ph/PH/About+us/Newsroom/Press+release/2019/Sun+Life+takes+no.+1+spot+for+8th+year+in+a+row?vgnLocale=en_CA</p> <p>10) Sun Life teams up with Raquel Pawnshop to offer affordable insurance</p> <p>https://www.sunlife.com.ph/PH/About+us/Newsroom/Press+release/2019/Sun+Life+teams+up+with+Raquel+Pawnshop+to+offer+affordable+insurance?vgnLocale=en_CA</p>

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			<ul style="list-style-type: none"> • Environmental Responsibility <i>Operational Footprint, Sustainable Investing</i> <p>The Sun Life Building http://sunlifebuilding-phil.com/index.html</p> <p>Sun Life Financial named one of the Most Sustainable Corporations in the World for tenth year in a row</p> <p>https://www.sunlife.com/Global/Newsroom/News+releases/Announcement/Sun+Life+Financial+named+one+of+the+Most+Sustainable+Corporations+in+the+World+for+tenth+year+in+a+row?vgnLocale=en_CA&id=123236</p> <p>Sun Life Foundation, Bantay Kalikasan Tie up for Eco-tourism Project</p> <p>https://www.sunlife.com.ph/PH/About+us/Newsroom/Press+release/2019/+Sun+Life+Foundation,+Bantay+Kalikasan+Tie+up+for+Eco-tourism+Project?vgnLocale=en_CA</p> <p><i>“Green bond investments support climate-smart projects in Asia</i></p> <p><i>2018 was a milestone year for Sun Life Philippines, marking its foray into green bonds to support sustainability projects. The company purchased: The International Finance Corp’s Green Bonds, the first of its kind in the Philippines. The proceeds of this issuance are being directed to renewable energy, energy efficiency and other climate-smart projects. Green bonds issued by Sindicatum Renewable Energy Company, a renewable energy developer and advocate of sustainable climate projects. Funds raised will support eligible clean energy projects in the Philippines.</i></p> <p>“</p> <p>2018 Sustainability Report (Page 32) https://cdn.sunlife.com/static/ph/About%20us/Corporate%20Governance/Sustainability_Report_2018.pdf</p>

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			<ul style="list-style-type: none"> • Community Wellness <i>Strategic Philanthropy, Infrastructure Investments, Public Policy</i> <ol style="list-style-type: none"> 1) Sun Life Resolution Run attracts over 3,000 runners, raises 5.5 million for charity The Sun Life Resolution Run was organized by Sun Life and its ambassador Piolo Pascual to encourage Filipinos to live healthier lives. In particular, the event aimed at raising awareness about diabetes, after a study that Sun Life commissioned dubbed “Asia Health Index” showed a considerable knowledge gap in the Filipinos’ understanding of the debilitating disease. This inspired Sun Life to hold the Resolution Run Asia-wide, specifically in five cities where it operates including Kuala Lumpur, Vietnam, Jakarta, Hong Kong, and Manila. https://www.sunlife.com.ph/PH/About+us/Newsroom/Press+release/2019/Sun+Life+Resolution+Run+attracts+over+3,000+runners,+raises+5.5+million+for+charity?vgnLocale=en_CA 2) Sun Life continued to invest in improving financial literacy levels in Asia, through initiatives such as The Brighter World Builder Challenge, a partnership of the Sun Life Philippines Foundation and The Spark Project (a pioneering crowdfunding platform in the Philippines) to search for, fund and accelerate financial literacy programs. Each of the 10 contest winners received a P100,000 grant and crowdsourcing support to implement their programs in local communities. 2018 Sustainability Report (Page 36) https://cdn.sunlife.com/static/ph/About%20us/Corporate%20Governance/Sustainability_Report_2018.pdf 3) Go Well Sun Life’s advocacy goes beyond financial well-being. It also extends to helping Filipinos become physically fit. Its new campaign called 'GoWell,' provides members the opportunity to learn how to keep healthy and fit through various means such as workouts, trainings, fitness classes, and more.

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			<p>https://www.gowell.com.ph/</p> <p>4) Sun Life Foundation concludes Project 120 Classrooms on a high note</p> <p>Sun Life Financial-Philippines Foundation, Inc., in partnership with Children’s Hour, has successfully concluded Project 120 Classrooms, an initiative that aims to build 120 classrooms in areas that were heavily hit by natural calamities.</p> <p>https://www.sunlife.com.ph/PH/About+us/Newsroom/Press+release/2019/Sun+Life+Foundation+concludes+Project+120+Classrooms+on+a+high+note?vgnLocale=en_CA</p> <p>5) Sun Life Financial Asia Releases New Diabetes Report in Asia</p> <p>The new report <i>Diabetes in Asia: Empowering Communities to Lead Healthier Lives</i> focuses on Hong Kong, the Philippines, Indonesia, Vietnam, and Malaysia highlighting the importance of engaging communities in these countries to fight the rising health problem.</p> <p>https://www.sunlife.com.ph/PH/About+us/Newsroom/Press+release/2019/Sun+Life+Financial+Asia+Releases+New+Diabetes+Report+in+Asia?vgnLocale=en_CA</p> <ul style="list-style-type: none"> • Governance and Risk Management <i>Ethics, integrity and Corporate Governance, Risk Management and Transparency and Disclosure</i> <p><u>2018 Annual Report/Board of Director and Credentials, Page 12-18</u> <u>2018 Annual Report/ Corporate Governance, Page 43</u> <u>2018 Annual Report/Philippine Leadership Team and Board Appointed Officers (Pages 19-22)</u></p> <p>https://cdn.sunlife.com/static/ph/About%20us/Corporate%20Governance/SunLife_AR_2019.pdf</p>

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			<p>Source Document:</p> <p>2018 Sustainability Report https://cdn.sunlife.com/static/ph/About%20us/Corporate%20Governance/Sustainability_Report_2018.pdf</p> <p>Sun Life's Newsroom https://www.sunlife.com.ph/PH/About+us/Newsroom/Press+release/2019?vgnLocale=en_CA</p>
C.1.4	Elaborates the company's efforts to interact with the communities in which they operate?	Y	<p>Sun Life 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>Sun Life acts through its subsidiary- Sun Life Foundation for all its corporate social responsibility projects or activities. Moreover, the Company's community-related efforts are based on its sustainability commitment. As Sun Life'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 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>This policy and its corresponding activities and programs are also disclosed in the company website and Annual Report.</p>

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	SCORECARD ITEM	Y/ N	Reference / Source document
			<p>Through several projects of the Sun Life Foundation, the Company engaged in the following activities:</p> <p>Source Document:</p> <p>The Sun Life Building http://sunlifebuilding-phil.com/index.html</p> <p>SLOCPI Website/ Sun Life Foundation https://www.sunlife.com.ph/PH/About+us/Sun+Life+Foundation?vgnLocale=en_CA</p> <p>2018 Annual Report/ Corporate Social Responsibility (Page 53-58) https://cdn.sunlife.com/static/ph/About%20us/Corporate%20Governance/SunLife_AR_2019.pdf</p>
C.1.5	Describe the company's anti-corruption programmes and procedures?	Y	<p>Sun Life 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 Sun Life, especially in our business relationships including those with suppliers, customers and government representatives.</p> <p>Generally, anti-corruption laws in the country where Sun Life 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 Sun Life 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. Sun Life'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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	SCORECARD ITEM	Y/ N	Reference / Source document
			<p>Sun Life 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>Source Document:</p> <p><u>Code of Business Conduct /Rejecting Anti-Bribery and Corruption (Page 13)</u> <u>Code of Business Conduct /Accepting and Receiving Gifts (Page 14)</u> <u>https://cdn.sunlife.com/static/philippines/About%20us/Static%20Files/Corporate%20Governance/2015/Code%20of%20Business%20Conduct.pdf</u></p>
C.1.6	Describes how creditors' rights are safeguarded?	Y	<p>This is described under SLOCPI's Company Policies which is posted on its official website as well as the Corporate Governance Page:</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. 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 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. 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"> · <i>Acting ethically and complying with applicable laws</i> · <i>Following responsible business practices</i> · <i>Following responsible employment practices and providing safe working conditions</i> · <i>Caring for the community and the environment</i> <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>

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	SCORECARD ITEM	Y/ N	Reference / Source document
			<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 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 effectively managing its risks and is committed to sustaining the growth of the Company."</i></p> <p><i>"Maintaining Books and Records</i> <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>

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	SCORECARD ITEM		Y/ N	Reference / Source document
				<p><i>We are responsible for the integrity of books and business, financial accounting and expense records under our control. xxx”</i></p> <p>Source Document: <u>SLOPCI Website/Company Policy/Rights of Creditors</u> <u>SLOPCI Website/Company Policy/Maintaining Books and Records</u> https://www.sunlife.com.ph/PH/About+us/Corporate+governance/Company+policies?vgnLocale=en_CA</p> <p><u>2018 Audited Financial Statement</u> https://cdn.sunlife.com/static/ph/About%20us/Corporate%20Governance/SLOCPI_AFS_SEC_2018.pdf</p> <p><u>2018 Annual Report (Pages 26-34)</u> https://cdn.sunlife.com/static/ph/About%20us/Corporate%20Governance/SunLife_AR_2019.pdf</p>
	<i>Does the company disclose the activities that it has undertaken to implement the above mentioned policies?</i>			
C.1.7	Customer health and safety	OECD Principle IV (A) & Global Reporting Initiative	Y	<p>Community wellness Sun Life believes that by actively supporting the communities in which we live and work, we can build a healthier, brighter future for Clients, employees, advisors and shareholders. This means:</p> <ul style="list-style-type: none"> • Activating high-impact philanthropy programs around the world, with a focus on diabetes prevention • Supporting our employees in their hands-on volunteer work. • Strategically investing in infrastructure projects that foster healthy, sustainable communities (<u>Sun Life Financial Centre at BGC Taguig City is a Leadership in Energy and Environmental Design or LEED-certified building</u>)

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			<ul style="list-style-type: none"> Advocating for public policies that strengthen healthcare, pension systems, insurance and infrastructure capacity in our society. <p>Activities:</p> <ol style="list-style-type: none"> Sun Life continued to invest in improving financial literacy levels in Asia, through initiatives such as The Brighter World Builder Challenge, a partnership of the Sun Life Philippines Foundation and The Spark Project (a pioneering crowdfunding platform in the Philippines) to search for, fund and accelerate financial literacy programs. Each of the 10 contest winners received a P100,000 grant and crowdsourcing support to implement their programs in local communities. <p>2018 Sustainability Report (Page 36) https://cdn.sunlife.com/static/ph/About%20us/Corporate%20Governance/Sustainability_Report_2018.pdf</p> <ol style="list-style-type: none"> Go Well Sun Life's advocacy goes beyond financial well-being. It also extends to helping Filipinos become physically fit. Its new campaign called 'GoWell,' provides members the opportunity to learn how to keep healthy and fit through various means such as workouts, trainings, fitness classes, and more. <p>https://www.gowell.com.ph/</p> <ol style="list-style-type: none"> Sun Life Foundation concludes Project 120 Classrooms on a high note <p>Sun Life Financial-Philippines Foundation, Inc., in partnership with Children's Hour, has successfully concluded Project 120 Classrooms, an initiative that aims to build 120 classrooms in areas that were heavily hit by natural calamities.</p>

C. Role of Stakeholders			
	SCORECARD ITEM	Y/ N	Reference / Source document
			<p>https://www.sunlife.com.ph/PH/About+us/Newsroom/Press+release/2019/Sun+Life+Foundation+concludes+Project+120+Classrooms+on+a+high+note?vgnLocale=en_CA</p> <p>4) Sun Life Financial Asia Releases New Diabetes Report in Asia</p> <p>The new report <i>Diabetes in Asia: Empowering Communities to Lead Healthier Lives</i> focuses on Hong Kong, the Philippines, Indonesia, Vietnam, and Malaysia highlighting the importance of engaging communities in these countries to fight the rising health problem.</p> <p>https://www.sunlife.com.ph/PH/About+us/Newsroom/Press+release/2019/Sun+Life+Financial+Asia+Releases+New+Diabetes+Report+in+Asia?vgnLocale=en_CA</p> <p>2018 Sustainability Report (Paage 37) https://cdn.sunlife.com/static/ph/About%20us/Corporate%20Governance/Sustainability_Report_2018.pdf</p> <p><i>Source Document:</i></p> <p>2018 Sustainability Report https://cdn.sunlife.com/static/ph/About%20us/Corporate%20Governance/Sustainability_Report_2018.pdf</p> <p><i>GoWell website [www.gowell.com.ph]</i></p>
C.1.8	Supplier/Contractor selection and criteria	Y	<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>

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			<p>Proposals are evaluated thoroughly and consideration is based on the value-add the product 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"> <i>1. The administrative Services Department (ASD) shall continuously search for vendors with the intention of establishing strategic and long-term business relationships.</i> <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"> <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> <i>2.2 Supplier with adequate financial strength who also have a reputation for adhering to specifications and delivery schedules.</i> <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> <i>4. There will be two types of accreditation, specific to vendor class:</i> <ol style="list-style-type: none"> <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> <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> <i>5. The following documents must be submitted for accreditation</i> <ol style="list-style-type: none"> <i>5.1 Non-primary</i>

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	SCORECARD ITEM	Y/ N	Reference / Source document
			<p>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)</p> <p>5.2 Primary</p> <p>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)</p> <p>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).</p> <p>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</p> <p>6. Exceptions to vendor accreditation are limited to the following:</p> <p>6.1 Emergency Purchase – acquisition requiring immediate delivery in which the time frame is shorter than the prescribed lead-time.</p> <p>6.2 If the materials and services requested are not available in any of the suppliers on the list of accredited vendors.</p> <p>6.3 If a vendor has exclusive dealership of the item/service being acquired. All exceptions to vendor accreditation require the approval of the Head of Administrative Services.</p> <p>7. All Supplier Accreditation and the exceptions to the process require the approval of the Head of Administrative Services Department “</p> <p>Source Document:</p> <p><u>https://cdn.sunlife.com/static/ph/About%20us/Corporate%20Governance/C.1.2%20Policy%20on%20Supplier%20Accreditation%20and%20Performance%20Evaluation%20(1).pdf</u></p>

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C.1.9	Environmentally-friendly value chain	Y	<p>Environmental responsibility</p> <p>Sun Life recognize the links between a healthy environment and a healthy economy, on which its business depends.</p> <p>Sun Life focuses on investing responsibly and managing environmental risks. We take responsibility for our business activities that impact the environment, holding ourselves accountable for managing our operating footprint. We also engage our employees and suppliers in environmental stewardship. In operating the Company, increasing our carbon management and resource efficiency through a focus on technology, and gaining greater efficiencies in energy consumption, travel, waste and water.</p> <p>“OUR APPROACH</p> <p><i>We are accountable for our impact on the environment, and work every day to measure, manage and reduce that impact.</i></p> <p><i>Through our environmental management framework, we integrate environmental sustainability into our day-to-day operations and decision-making. Our wide range of programs and practices aim to manage the environmental footprint of our business. We track and report on key environmental indicators to monitor progress and identify opportunities for improvement. We also assess climate risk and other environmental impacts through extensive risk management systems – refer to pages 44-45.</i></p> <p>Climate Action</p> <p><i>Given the nature of our business as an insurance, wealth and asset management provider with locations around the world, we view the most significant aspects of our environmental footprint to be those related to energy consumption and the resulting greenhouse gas (GHG) emissions, which affect the climate.</i></p> <p><i>In the face of a changing climate and increasingly resource-constrained world, we recognize that the financial services industry has an important role to play in reducing GHG emissions, building climate resilience and investing in the transition to a low carbon economy (refer to Infrastructure Investments on pages 38-39). We’re tackling climate change on all these fronts and have established GHG emissions intensity reduction targets that support the global response to climate change – including the Paris Agreement with its aim of</i></p>

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			<p><i>keeping global temperature rise this century well below two degrees Celsius above pre-industrial levels, and the Sustainable Development Goals.</i></p> <p><i>We aim to reduce our GHG emissions intensity 20% by 2020 and 30% by 2030, across our corporate and investment real estate portfolios (based on tonnes per square foot, relative to a 2014 baseline).</i></p> <p>Green Buildings <i>As buildings are a major contributor to GHG emissions, we strive to ensure our facilities are environmentally sound. We have established sustainability design standards for our offices and use a sustainability scorecard to evaluate a site before entering a lease. In North America, Sun Life owns and leases over 22 million square feet of green-certified space. All of our major corporate sites in Canada, in addition to many properties in our investment portfolio, are Leadership in Energy and Environmental Design (LEED®) or BOMA BEST</i></p> <p>Sustainability in our Workplaces and Beyond <i>A major shift in our way of thinking and acting is leading us to change the way we work. BrightWork is how we refer to the changes and encompasses both the physical spaces we use and the way we work together. We are creating a workplace that will better meet our needs today and in the future—and one that we believe will also reduce our environmental impact.”</i></p> <p>Source Document:</p> <p>Sustainability Report (Page 27) https://cdn.sunlife.com/static/ph/About%20us/Corporate%20Governance/Sustainability_Report_2018.pdf</p> <p>The Sun Life Building http://sunlifebuilding-phil.com/index.html</p> <p>Sun Life Financial named one of the Most Sustainable Corporations in the World for tenth year in a row https://www.sunlife.com/Global/Newsroom/News+releases/Announcement/Sun+Life+Financial+named+one+of+the+Most+Sustainable+Corporati</p>

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	SCORECARD ITEM	Y/ N	Reference / Source document
			ons+in+the+World+for+tenth+year+in+a+row?vgnLocale=en_CA&id=123236 https://www.sunlife.ca/ca/About+us/Achievements?vgnLocale=en_CA
C.1.1 0	Interaction with the communities	Y	<p>Through several projects of the Sun Life Foundation, the Company engaged in the following activities:</p> <p>“EDUCATION</p> <p><i>A brighter life starts with education and year after year, Sun Life Foundation makes sure that it contributes to the country’s nation building through its various initiatives in education. By the end of 2018, the Sun Life Foundation through its implementing partner, Children’s Hour, has built 96 classrooms from 30 public schools. Project 120 Classrooms started back in 2015 and was the Foundation’s response to Typhoon Yolanda and the 7.2 magnitude earthquake in Bohol. It was a dark time and families not only lost homes, properties and loved ones. They also lost hope. Sun Life Foundation, who was celebrating its 120th year in the Philippines, knew it was the perfect time to give back and what better way to bring back hope than to inspire resiliency, joy and hope in our future nation builders—the schoolchildren.</i></p> <p><i>This year, Sun Life Foundation went beyond just providing fully functional classrooms and learning resources. The Foundation also introduced innovative methods to encourage teachers and students to appreciate concepts in financial wellness, inspiring them to build loftier dreams while building skills in financial literacy.</i></p> <p><i>Sun Life Foundation’s dream of bringing education closer to Filipinos are further strengthened by its scholarship grant in seven academic institutions spread across the country, providing full scholarships and benefits to deserving college students. The Foundation also provides educational assistance to 8 kids from Hebreo 12:1 Foundation and 17 kids from ABS-CBN Lingkod Kapamilya Foundation’s Bantay Edukasyon program.</i></p> <p><i>The Department of Education’s “Brigada Eskwela” continues to gather hundreds of Sun Lifers to clean and revamp public elementary schools in Metro Manila, Cebu, Davao, Iloilo and Bacolod. To give kids from disadvantaged communities a head start at school, Sun Life Foundation also provided one thousand five hundred schoolbags complete with school supplies. These bags</i></p>

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	SCORECARD ITEM	Y/ N	Reference / Source document
			<p>were distributed in public schools in Pateros in Metro Manila, Calauan in Laguna, Bukidnon and Agusan del Sur.</p> <p>HEALTH A brighter life can only be fully enjoyed when we are at the best of health. Sun Life Foundation believes that health should be accessible to all. For more than a decade, the Foundation organizes mass bloodletting activities in Sun Life’s Head Office as well as in four provincial branches. Simple yet life changing, these blood drives find hundreds of employees and advisors donating thousands of units of blood to the Philippine National Red Cross.</p> <p>With the help of its implementing partner, Gota de Leche, Sun Life Foundation brought medical services and nutrition support closer to undernourished children, children with disabilities and pregnant/lactating women from two depressed urban areas in Metro Manila and five geographically isolated areas in Benguet, Ifugao, Iloilo and two far-flung islands in Cebu.</p> <p>For years now, Sun Life Foundation has supported Kythe Foundation in addressing the psychosocial needs of disadvantaged Filipino children afflicted with cancer and other chronic illnesses. This year, the Foundation continues to send recovering hema-onco patients to school, fund a day camp to boost the morale of cancer champions and provide transportation subsidy to patients and their caregivers enabling them to complete recommended treatments. To transform more lives, Sun Life Foundation made medical and surgical services available to disadvantaged families from remote, underserved communities.</p> <p>By working with the World Surgical Foundation, 475 indigent patients from Bukidnon and Aklan received lifechanging surgeries helping them live a more fulfilling life.</p> <p>ENVIRONMENT From protecting upland ecosystems, conserving coastal & marine areas and transforming communities, Sun Life Foundation continues to support environment projects that call for holistic and sustainable development. Together with the World Wildlife Fund for Nature – Philippines, Sun Life</p>

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	SCORECARD ITEM	Y/ N	Reference / Source document
			<p><i>Foundation supports the Sablayan Ridge to Reef Project which aims to protect two major conservation sites in the country—Mts. Iglit-Baco, home of the critically endangered tamaraws, and the Apo Reef, the country’s largest and best-preserved atoll formed reef. The vision is for Sablayan to become a municipality that fully embraces the ridge-to-reef approach and its people benefitting from its natural resources sustainably.</i></p> <p><i>To culminate its multi-year partnership, Sun Life Foundation and ABS-CBN Lingkod Kapamilya Foundation completed a river rehabilitation and linear park development project in Tumana, Marikina. This multimillion project aims to contribute to the rehabilitation of the Pasig River (of which the Tumana-Malanday Creek is a tributary) while providing safe, open spaces to the families living in proximity to the creek. Intensive information and education campaigns and identification of “River Warriors” ensures that community efforts on maintaining the cleanliness of the Tumana-Malanday Creek is sustained. An estimated 7,625 households or 35,544 individuals will benefit from the project.</i></p> <p><i>Sun Life Foundation works with the same partner in raising awareness on the importance of mangroves and the environment while providing valuable income for the local communities through eco-tourism in Gubat, Sorsogon.”</i></p> <p>Source Document:</p> <p><u>SLOCPI Website/ Sun Life Foundation</u> <u>https://www.sunlife.com.ph/PH/About+us/Sun+Life+Foundation+Video?vgLocale=en_CA</u></p> <p><u>2018 Annual Report (Page 53-58)</u> <u>https://cdn.sunlife.com/static/ph/About%20us/Corporate%20Governance/SunLife_AR_2019.pdf</u></p>
C.1.1 1	Anti-corruption programmes and procedures	Y	<p>Sun Life 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><i>“Rejecting Bribery and Corruption</i></p>

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	SCORECARD ITEM	Y/ N	Reference / Source document
			<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>Source Document:</p> <p><u>SLOCPI Website/Company Policy/Rejecting Corruption and Bribery</u> https://www.sunlife.com.ph/PH/About+us/Corporate+governance/Company+policies?vgnLocale=en_CA</p> <p><u>Code of Business Conduct: Rejecting Corruption and Bribery (Page 12)</u> <u>Code of Business Conduct: Accepting and Receiving Gifts and Entertainment (Page 13)</u> https://cdn.sunlife.com/static/philippines/About%20us/Static%20Files/Corporate%20Governance/2015/Code%20of%20Business%20Conduct.pdf</p>
C.1.1 2	Creditors' rights	Y	<p>Creditors' rights are protected through the observance of following standards:</p> <p>Maintaining Books and Records</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>Our financial statements, books and records accurately reflect all business transactions and be retained in accordance with our record keeping practices. Failing to disclose record revenues, expenses, assets or liabilities is prohibited.</i></p>

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	SCORECARD ITEM	Y/ N	Reference / Source document
			<p><i>We are responsible for the integrity of books and business, financial accounting and expense records under our control. “</i></p> <p>Maintaining Appropriate Controls</p> <p><i>We all participate in Sun Life’s control framework. Internal controls help us achieve our business objectives, mitigate risks and meet our ethical obligations to our customers and other stakeholders.</i></p> <p><i>Our internal controls are designed to provide reasonable assurance that:</i></p> <ul style="list-style-type: none"> ○ <i>our operations are effective and efficient,</i> ○ <i>our financial reporting is reliable, and</i> ○ <i>we comply with laws and regulations</i> <p><i>Our commitment to internal control is reflected in Sun Life’s strong control environment which includes:</i></p> <ul style="list-style-type: none"> ○ <i>the Sun Life Audit and Conduct Review Committee, which provides oversight and guidance over internal control practices and Sun Life’s financial reporting,</i> ○ <i>a commitment to acting ethically as set out in the Code,</i> ○ <i>a sound organizational structure reflecting clear and appropriate accountabilities and authorities, and</i> ○ <i>competent and appropriately compensated employees.</i> <p><u>Source Document:</u></p> <p><u>Code of Business Conduct: Maintaining Books and Records (page 23)</u> https://cdn.sunlife.com/static/philippines/About%20us/Static%20Files/Corporate%20Governance/2015/Code%20of%20Business%20Conduct.pdf</p>
C.1.1 3	Does the company have a separate corporate responsibility (CR) report/section or sustainability report/section?	OECD Principle V (A): Disclosure should include, but not be limited to, material information on: (7) Issues regarding employees and other stakeholders.	Y The Sustainability Report is published on the Company’s website. The Annual Report also contains a discussion of the Company’s Corporate Social Responsibility Program and activities. Sun Life Foundation

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	SCORECARD ITEM	Y/ N	Reference / Source document
	Companies are encouraged to provide information on key issues relevant to employees and other stakeholders that may materially affect the long term sustainability of the company.		<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> <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 & 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>Source Document:</p> <p><u>2018 Sustainability Report</u> https://cdn.sunlife.com/static/ph/About%20us/Corporate%20Governance/Sustainability_Report_2018.pdf</p> <p><u>2018 Annual Report (Page 63-68)</u> https://cdn.sunlife.com/static/ph/About%20us/Corporate%20Governance/SunLife_AR_2019.pdf</p> <p><u>Sun Life Foundation</u> https://www.sunlife.com.ph/PH/About+us/Sun+Life+Foundation?vgnLocale=en_CA</p>
C.2	Where stakeholder interests are protected by law, stakeholders should have the opportunity to obtain effective redress for violation of their rights.		

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	SCORECARD ITEM	Y/ N	Reference / Source document
C.2.1	<p>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?</p>	<p>OECD Principle IV (B): Where stakeholder interests are protected by law, stakeholders should have the opportunity to obtain effective redress for violation of their rights.</p> <p>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.</p>	<p>Y</p> <p>Sun Life's contact details are found on the company's website at the "Contact Us" page, which allows customers, suppliers, general public etc. to contact us for any concerns (Products and Services, Existing Account, Find an Advisor, Concerns and Feedback, Others). The address and contact information of Sun Life's branches and offices throughout the Philippines are also listed in the Annual Report.</p> <p>In the Annual Report, we also have the section on "Whistle Blower and Breach Policy" and its corresponding contact details. To wit:</p> <p><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 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>When you suspect a breach of the Sun Life Financial Code of Business Conduct, the same must be promptly reported to the Compliance Officer, Head of Human Resources, or the General Counsel. The following Ethics Hotline are also 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 Alertline number 800 481-6966</i></p> <p><i>For English, please select 1</i> <i>For Filipino, 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</i> <i>Email to: slf_code_of_business_conduct@sunlife.com"</i></p>

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	SCORECARD ITEM		Y/ N	Reference / Source document
				<p>Source Document:</p> <p><u>"Contact Us" Page, Company Website</u> https://www.sunlife.com.ph/PH/About+us/Contact+us?vgnLocale=en_CA</p> <p><u>2018 Annual Report (Pages 59-69)</u> https://cdn.sunlife.com/static/ph/About%20us/Corporate%20Governance/SunLife_AR_2019.pdf</p> <p><u>2018 Annual Report (Page 42)</u> https://cdn.sunlife.com/static/ph/About%20us/Corporate%20Governance/SunLife_AR_2019.pdf</p>
C.3	Performance-enhancing mechanisms for employee participation should be permitted to develop.			
C.3.1	<p>Does the company explicitly disclose the health, safety, and welfare policy for its employees?</p>	<p>OECD Principle IV (C): 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>	Y	<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 the Code of Business Conduct.</p> <p>Promoting Fairness and Safety in the Workplace <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 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</i></p>

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	<p>Examples of mechanisms for 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>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>GoWell Employee health and welfare are also promoted through GoWell, a wellness community aimed at helping people live healthier, brighter lives. Through its website www.gowell.com.ph, Sun Life offers clients, employees and other Filipinos fitness and wellness content for the body, mind 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"> • Access to fitness and wellness content • Perks and privileges from our partner establishments • Entry into GoWell events • Opportunity to meet other health and wellness enthusiasts in the community <p>Whistle Blower and Breach Policy Employees’ health, safety and welfare are also protected through the Company’s Whistle Blower and Breach Policy.</p> <p><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 any form of retaliation</i></p>

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	SCORECARD ITEM	Y/ N	Reference / Source document
			<p><i>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>When you suspect a breach of the Sun Life Financial Code of Business Conduct, the same must be promptly reported to the Compliance Officer, Head of Human Resources, or the General Counsel. The following Ethics Hotline are also available 24 hours a day.</i></p> <p><i>Dial 105-11 or 105-12 (Cell phone – no “02” Prefix) Dial 1010-5511-00 (Landline)</i></p> <p><i>You’ll be prompted to dial Alertline number 800 481-6966</i></p> <p><i>For English, please select 1 For Filipino, 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</i></p> <p><i>Email to: slf_code_of_business_conduct@sunlife.com”</i></p> <p>Source Document:</p> <p><u>https://cdn.sunlife.com/static/philippines/About%20us/Static%20Files/Corporate%20Governance/2015/Code%20of%20Business%20Conduct.pdf</u></p>
C.3.2	Does the company publish relevant information relating to health, safety and welfare of its employees?	Y	<p>Publication is done through the website and 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>Promoting Fairness and Safety in the Workplace</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,</i></p>

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	SCORECARD ITEM	Y/ N	Reference / Source document
			<p><i>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 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>"Workforce Wellness <i>Employee wellness underpins our ability to deliver exceptional service to Clients, attract and retain top talent and continually enhance our high-performance culture. Research shows that companies with the most effective health and productivity programs have improved financial results¹ and save 1.5-1.7 days of absenteeism per employee per year."</i>(Sustainability Report)</p> <p>GoWell Employee health and welfare are also promoted through GoWell, a wellness community aimed at helping people live healthier, brighter lives. Through its website www.gowell.com.ph, Sun Life offers clients, employees and other Filipinos fitness and wellness content for the body, mind 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>

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			<p>GoWell members receive the following privileges:</p> <ul style="list-style-type: none"> • Access to fitness and wellness content • Perks and privileges from our partner establishments • Entry into GoWell events • Opportunity to meet other health and wellness enthusiasts in the community <p>Source Document:</p> <p><u>Code of Business Conduct (Page 17)</u> https://www.sunlifegrepa.com/upload/files/Code%20of%20Business%20Conduct.pdf</p> <p><u>SLOCPI Website/Company Policy/ Promoting wellness and Safety in the Workplace</u> https://www.sunlife.com.ph/PH/About+us/Corporate+governance/Company+policies?vgnLocale=en_CA</p> <p><u>2018 Sustainability Report (Page 20)</u> https://www.sunlifegrepa.com/upload/files/Sustainability_Report_E2018.pdf</p> <p><u>GoWell (www.gowell.com.ph)</u></p>
C.3.3	Does the company have training and development programmes for its employees?	Y	<p>The Training section on the website provides information on the training and development programs.</p> <p><i>“New Hire Training/Internal Mobility</i> <i>As a new hire, you will undergo a comprehensive on-boarding program to facilitate you’re adjustment to your new workplace. You will also receive training based on your specific role as well as your functional area.</i></p> <ul style="list-style-type: none"> • <i>These programs include:</i> • <i>Skill-based classroom training</i> • <i>Online training</i> • <i>Structured self-study materials</i>

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	SCORECARD ITEM	Y/ N	Reference / Source document
			<p>Professional development Throughout your career at Sun Life, you will have access to many skill and personal development programs, including:</p> <ul style="list-style-type: none"> • Competency-based training programs • Global leadership development programs • Technical training programs • Tuition reimbursement for approved courses <p>Underpinning these development programs is the Global Career Framework that will help you better understand the skills and competencies you need to succeed in your current and in any role you might be interested to pursue within the organization.</p> <p>Industry-Related Designation Program You can participate in our industry-designation program to become a certified specialist in the insurance industry by taking courses through the Life Office Management Association (LOMA), an international insurance industry designation program. We cover the cost of materials, and award monetary incentives for passing the exams and achieving the designation.</p> <p>Global Opportunities Sun Life is a multinational company with offices all over the world. Our training does not remain in the walls of our local office. As needed, we send our employees to our other offices to share and learn best practices from counterparts.”</p> <p>Source Document:</p> <p><u>SLOCPI Website/Become an Employee/Our Rewards and Benefits</u> <u>https://www.sunlife.com.ph/PH/About+us/Become+an+employee/Our+rewards+and+benefits?vgnLocale=en_CA</u></p>
C.3.4	Does the company publish relevant information on training and development programmes for its employees?	Y	<p>The Training section on the website provides information on the training and development programs.</p> <p>New Hire Training/Internal Mobility</p>

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			<p><i>As a new hire, you will undergo a comprehensive on-boarding program to facilitate you're adjustment to your new workplace. You will also receive training based on your specific role as well as your functional area.</i></p> <ul style="list-style-type: none"> • <i>These programs include:</i> • <i>Skill-based classroom training</i> • <i>Online training</i> • <i>Structured self-study materials</i> <p>Professional development <i>Throughout your career at Sun Life, you will have access to many skill and personal development programs, including:</i></p> <ul style="list-style-type: none"> • <i>Competency-based training programs</i> • <i>Global leadership development programs</i> • <i>Technical training programs</i> • <i>Tuition reimbursement for approved courses</i> <p><i>Underpinning these development programs is the Global Career Framework that will help you better understand the skills and competencies you need to succeed in your current and in any role you might be interested to pursue within the organization.</i></p> <p>Industry-Related Designation Program <i>You can participate in our industry-designation program to become a certified specialist in the insurance industry by taking courses through the Life Office Management Association (LOMA), an international insurance industry designation program. We cover the cost of materials, and award monetary incentives for passing the exams and achieving the designation.</i></p> <p>Global Opportunities <i>Sun Life is a multinational company with offices all over the world. Our training does not remain in the walls of our local office. As needed, we send our employees to our other offices to share and learn best practices from counterparts."</i></p> <p>Source Document:</p> <p><u>SLOCPI Website/Become an Employee/Our Rewards and Benefits</u></p>

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			https://www.sunlife.com.ph/PH/About+us/Become+an+employee/Our+rewards+and+benefits?vgnLocale=en_CA
C.3.5	Does the company have a reward/compensation policy that accounts for the performance of the company beyond short-term financial measures?	Y	<p>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.</p> <p><i>“Our Rewards</i></p> <p><i>We offer our employees a fair and competitive compensation package and a rewarding career in line with their job, skills and performance.</i></p> <p><i>Every year, we compare our remuneration practices with other multinational and large local financial services companies in the Philippines to ensure that our salary scale is up to par.</i></p> <p><i>We compensate based on the value of the job of individual employees. Wherever you work across the Philippines, the respective income will reflect the level of responsibilities and accountabilities within the Sun Life Financial Philippines.</i></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><i>Together with a competitive package, we grant our employees and dependents with benefit packages to address everyday needs and prepare for their financial security.</i></p> <p><i>The following benefits are given to employees:</i></p> <p><i>For your needs today:</i></p> <ul style="list-style-type: none"> • <i>Group Medical Coverage</i> • <i>Vacation and Sick Leaves</i> • <i>Employee loan programs for house or car</i>

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	SCORECARD ITEM		Y/ N	Reference / Source document
				<p>For your future financial security:</p> <ul style="list-style-type: none"> • Pension Plan • Life insurance • Opportunities to purchase company’s insurance and wealth management products” <p>Source Document:</p> <p>“Our Rewards”, Sun Life Website https://www.sunlife.com.ph/PH/About+us/Become+an+employee/Our+rewards+and+benefits?vgnLocale=en_CA</p>
C.4	<p>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.</p>			
C.4.1	<p>Does the company have procedures for complaints by employees concerning illegal (including corruption) and unethical behaviour?</p>	<p>OECD Principle IV (E): 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>	Y	<p>The Code of Business Conduct specifies the procedures that must be followed for complaints by employees.</p> <p><i>“HOW DO I REPORT THE BREACH OF A 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 SOMEONE ELSE has contravened the Code of 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, if you feel that someone has not responded appropriately to your report, use the Employee Ethics Hotline. You can access the Hotline either through a toll-free telephone number (local telephone information available on The Source) or a secure website on the Internet (at www.employee-ethics-hotline.com). The Hotline service are handled by outside service provider, and are available to all employees seven days a week, 24 hours a day in multiple languages.</i></p>

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			<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 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 help us maintain our commitment to high standards of business ethics and integrity.”</i></p> <p>Annually, Sun Life employees and directors are asked to acknowledge/ confirm their adherence to the Code of Business Conduct. Refresher training is also taken annually on this subject.</p> <p>The Annual Report also has a section on the Whistle Blower Policy and Breach Reporting.</p> <p><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 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>When you suspect a breach of the Sun Life Financial Code of Business Conduct, the same must be promptly reported to the Compliance Officer, Head of Human Resources, or the General Counsel. The following Ethics Hotline are also available 24 hours a day.</i></p> <p><i>Dial 105-11 or 105-12 (Cell phone – no “+63” Prefix using Globe or Smart lines.)</i></p> <p><i>Dial 1010-5511-00 (Landline)</i></p> <p><i>You’ll be prompted to dial Alertline number 800 481-6966 For English, please select 1 For Filipino, please select 9</i></p>

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	SCORECARD ITEM	Y/ N	Reference / Source document
			<p><i>The whistleblower may also submit his or her report or concern in writing directly to the Compliance Officer, or by Email to: slf_code_of_business_conduct@sunlife.com”</i></p> <p>The procedures is also available from SLOCPI’s website under Company Policy.</p> <p>Source Document:</p> <p><u>Code of Business Conduct/Reporting Code Breaches (Page 5-6)</u> https://cdn.sunlife.com/static/ph/About%20us/Corporate%20Governance/Code%20of%20Business%20Conduct.pdf</p> <p><u>2018 Annual Report (Page 42)</u> https://cdn.sunlife.com/static/ph/About%20us/Corporate%20Governance/SunLife_AR_2019.pdf</p> <p><u>SLOCPI Website/Company Policy/Reporting Code Breaches</u> https://www.sunlife.com.ph/PH/About+us/Corporate+governance/Company+policies?vgnLocale=en_CA</p>
C.4.2	Does the company have a policy or procedures to protect an employee/person who reveals illegal/unethical behavior from retaliation?	Y	<p><i>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.</i></p> <p><i>This is clearly provided in the Code of Business Conduct.</i></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><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, mischievous or malicious allegations of breach itself is a breach of the Code. “</i></p>

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	SCORECARD ITEM	Y/ N	Reference / Source document
			<p>The procedure on how to report a breach of Sun Life’s code is also available on SLOCPI’s website under Company Policy</p> <p><i>“Reporting Code Breaches</i> <i>Sun Life is committed to leading with integrity and takes breaches of the Code seriously. We must all take an active role in ensuring the Code is applied throughout Sun Life and that breaches of the Code are handled appropriately.</i></p> <p>How Do I Report A Breach of the Code?</p> <p><i>Advise your manager, human resources, a compliance officer or 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>Philippines Dial 105 11 (cell phone – no “02” prefix) Dial 1010-5511-00 (land line)</i></p> <p><i>For Tagalog Dial 105-12 (cell phone – no “02” prefix) Dial 010-5511-10 (land line)</i></p> <p><i>You’ll be prompted to dial the Alertline number 800 481-6966 for Filipino, please select “9”</i></p> <p><i>The whistleblower may also submit his or her report or concern in writing directly to the Chief Compliance Officer, or by email to: slf_code_of_business_conduct@sunlife.com</i></p> <p><u>Source Document:</u></p> <p><u>Code of Business Conduct: Reporting Code Breaches (Page 5-6)</u> https://cdn.sunlife.com/static/ph/About%20us/Corporate%20Governance/Code%20of%20Business%20Conduct.pdf</p>

C. Role of Stakeholders

C. Role of Stakeholders			
	SCORECARD ITEM	Y/ N	Reference / Source document
			<u>SLOCPI Website/Company Policy/Reporting Code Breaches https://www.sunlife.com.ph/PH/About+us/Corporate+governance/Company+policies?vgnLocale=en_CA</u>