

COMPANY NAME Northwest Insurance & Surety Co., Inc.  
 FINANCIAL YEAR END 2016  
 SECTOR Insurance  
 COMPANY STRUCTURE Class 3

		Source Document/Location of Information	Answer	Remarks
<b>D Disclosure and Transparency</b>				
<b>D.1 Transparent ownership structure</b>				
D.1.1	Does the information on shareholdings reveal the identity of beneficial owners, holding 5% shareholding or more?	2017 General Information Sheet	Y	The company does not have beneficial owners. All shares are owned and registered in the name of the direct owners.
D.1.2	Does the company disclose the direct and indirect (deemed) shareholdings of major and/or substantial shareholders?		Y	There is full disclosure of the ownership structure of the company.
D.1.3	Does the company disclose the direct and indirect (deemed) shareholdings of directors (commissioners)?		Y	There is full disclosure of the ownership structure of the company.
D.1.4	Does the company disclose the direct and indirect (deemed) shareholdings of senior management?		Y	There is full disclosure of the ownership structure of the company.
D.1.5	Does the company disclose details of the parent/holding company, subsidiaries, associates, joint ventures and special purpose enterprises/ vehicles (SPEs)/ (SPVs)?	2017 General Information Sheet	N	The company is an independent entity.

<b>D.2 Quality of Annual Report</b>				
	Does the company's annual report disclose the following items:			
D.2.1	Key risks		N	
D.2.2	Corporate objectives		N	
D.2.3	Financial performance indicators		N	
D.2.4	Non-financial performance indicators		N	
D.2.5	Dividend policy		N	
D.2.6	Details of whistle-blowing policy		N	
D.2.7	Biographical details (at least age, qualifications, date of first appointment, relevant experience, and any other directorships of listed companies) of directors/commissioners		N	
D.2.8	Training and/or continuing education programme attended by each director/commissioner		N	
D.2.9	Number of board of directors/commissioners meetings held during the year		N	
D.2.10	Attendance details of each director/commissioner in respect of meetings held		N	
D.2.11	Details of remuneration of each member of the board of directors/commissioners		N	
	Corporate Governance Confirmation Statement			
D.2.12	Does the Annual Report contain a statement confirming the company's full compliance with the code of corporate governance and where there is non-compliance, identify and explain reasons for each such issue?		N	

<b>D.3. Disclosure of related party transactions (RPT)</b>				
D.3.1	Does the company disclose its policy covering the review and approval of material/significant RPTs?	Notes to Financial Statements 2016 (Item 29, page 42)	Y	The Annual Audited Financial Statements contain disclosures on RPTs.
D.3.2	Does the company disclose the name of the related party and relationship for each material/significant RPT?	Notes to Financial Statements	Y	The Annual Audited Financial Statements contain

D.3.3	Does the company disclose the nature and value for each material/significant RPT?	2016 (Item 29, page 42)	Y	disclosures on RPTs.
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**D.4 Directors and commissioners dealings in shares of the company**

D.4.1	Does the company disclose trading in the company's shares by insiders?		N/A	The company is not listed in the Philippine Stock Exchange. It is a closely-held family corporation and shares are not actively traded.
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**D.5 External Auditor and Auditor Report**

D.5.1	Are audit fees disclosed?		N	
	Where the same audit firm is engaged for both audit and non-audit services			
D.5.2	Are the non-audit fees disclosed?		N/A	The company did not engage in non-audit services during the year under review.
D.5.3	Does the non-audit fees exceed the audit fees?		N/A	The company did not engage in non-audit services during the year under review.

**D.6 Medium of communications**

	Does the company use the following modes of communication?			
D.6.1	Quarterly reporting	Submission of quarterly reports to the Insurance Commission Statement of Paid-Up Capital, Reserves and Investments	Y	The company has religiously complied with the various quarterly reportorial requirements of the Insurance Commission such as the Statement of Paid-up Capital Reserves and Investments.
D.6.2	Company website	<a href="http://northwestins.com.ph">http://northwestins.com.ph</a>	Y	
D.6.3	Analyst's briefing		N/A	The company is not publicly traded. It is a closely-held family corporation.
D.6.4	Media briefings /press conferences		N/A	

**D.7 Timely filing/release of annual/financial reports**

D.7.1	Is the audited annual financial report / statement released within 120 days from the financial year end?		N	
D.7.2	Is the annual report released within 120 days from the financial year end?		N	
D.7.3	Is the true and fairness/fair representation of the annual financial statement/reports affirmed by the board of directors/commissioners and/or the relevant officers of the company?	Statement of Management's Responsibility for Financial Statements 2016 (2016 Audited Financial Statements page 1)	Y	

**D.8 Company website**

	Does the company have a website disclosing up-to-date information on the following:			
D.8.1	Business operations	<a href="http://northwestins.com.ph">northwestins.com.ph</a>	Y	The Company's website discloses its Business Operations.
D.8.2	Financial statements/reports (current and prior years)	Audited Financial Statements (2016 and 2015)	Y	
D.8.3	Materials provided in briefings to analysts and media		N	The company is not publicly listed.
D.8.4	Shareholding structure		N	

D.8.5	Group corporate structure		N	
D.8.6	Downloadable annual report		N	
D.8.7	Notice of AGM and/or EGM	<a href="#">Notice of 2017 ASM</a>	Y	
D.8.8	Company's constitution (company's by-laws, memorandum and articles of association)	<a href="#">By-Laws</a> <a href="#">Amended Articles of Incorporation</a>	Y	The company's Articles of Incorporation and By-laws are available on its website.

**D.9 Investor relations**

D.9.1	Does the company disclose the contact details (e.g. telephone, fax, and email) of the officer / office responsible for investor relations?		N/A	<b>The company is a closely-held family corporation.</b>
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