



Republic of the Philippines
Department of Finance
INSURANCE COMMISSION
1071 United Nations
Avenue Manila



ANNEX "A"

AML AND CTF COMPLIANCE QUESTIONNAIRE

INTRASTRATA ASSURANCE CORPORATION

NAME OF ICRE

July 28 ,2021

Date Accomplished

A. BOARD OF DIRECTOR AND SENIOR MANAGEMENT OVERSIGHT

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

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

Answer: Yes there are clear guidelines and strategic objectives crafted by the BOD to ensure that the Company will not be used as conduit by the money launderers from their unlawful financing activities. Details as follows:

- Strong KYC Program- the Company has effective KYC guidelines when obtaining personal information from the clients to properly assess client's identity and their financial sources as well as the type of business they own.
- The Company developed effective communication policies for the entire organization to ensure that all corporate activities are in compliance with the rules and regulations of government agencies.
- Appointment of a Compliance officer who will oversee the Compliance Program of the entire organization and ensure that it is properly implemented.
- Identify principal business risks and ensure proper implementation of appropriate risk management systems in conformity with the compliance framework
- Ensure that all approved corporate policies, procedures and controls are cascaded to senior management and other relevant employees for proper implementation of the compliance program.

- Awareness of the sanction list released by the international competent authorities with regards to the list of individuals or groups or entities subject to money laundering activities.
- b. In relation to question no. 1, please describe the control policies and mechanisms (e.g. reportorial requirements, rewards and disciplinary system, training program, etc.) adopted by the BOD to attain these policies and objectives.

ANSWER:

- Under the KYC guidelines, when dealing with clients, initially the company requires them to fill up the Application Forms wherein all basic personal information are stated. We attach various Annexes as samples of identification for the client. Additional documents will be required if necessary on a case to case basis to check the authenticity of the client's identity. For the financial and business background of the client, the company may require the submission of the FS, GIS, Certificates of Registration issued by DTI or SEC if the client is a corporation.
 - For an effective communication system, all memoranda and approved policies and procedures by the BOD are properly channeled to all Departments for proper implementation in compliance with the standards.
 - As a domestic corporation, single transaction amounting to Php 500,000.- is properly reported to regulating authorities.
 - We make appropriate use of the relevant findings of Anti Money Laundering Council (AMLC) for those individuals or groups that are in the sanction lists issued by international competent authorities.
- c. Please describe the entity's framework for ML and TF prevention. What are the roles of the BOD, Senior Management, Compliance Office, Internal Audit and other Offices in ML and TF prevention? What reports are required to be submitted to the BOD to assist them in their decision-making processes?

ANSWER:

The Company has adopted a defensive compliance program to detect and identify suspicious transactions and report the same to the proper authorities.

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

ANSWER:

The company is currently at the stage of developing a risk management system framework which will help minimize the adverse effect of a financial loss by (a) identifying potential sources of loss; (b) measuring the financial consequences of a loss occurring; and (c) using controls

to minimize actual losses or their financial consequences relative to ML and TF prevention

A part of this program is the creation of Risk Management Committee which will be headed by Chief Risk Officer (CRO) and in partner with the Compliance Officer, who will be at the forefront to combat and prevent ML and TF occurrence in the company.

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

ANSWER:

No, the Compliance Officer of ISAC reports directly to the President if there are relevant findings with the clients.

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

ANSWER: The Compliance Officer of the company is authorized to investigate, inquire, secure relevant documents, interview pertinent personalities, formulate and suggest policies to prevent ML and TF occurrence within the company.

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

ANSWER:

-The Board and Senior Managers are in the process of establishing a Risk Oversight Committee which would be responsible for the oversight of a company's Enterprise Risk Management system to ensure its functionality and effectiveness to combat ML and TF.

- Regular review that all corporate activities are in compliance with the framework.

2. /z/ent/f/cat/on, /Ideaszzremenf, Monitoring And Controlling Of Risks And Problems Re/afez/ To ML And TF

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

Answer

- The company always conducts risk profiling of all of its clients as it is vital to arrive in every business judgment undertaken by the entity.

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

Answer

- Currently, the company has yet to conduct an assessment of its risk and vulnerabilities, nonetheless, it will seek guidance from the experts in the field and appropriate government agencies to better ascertain the state of its operation.

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

Answer

- The company has yet to be exposed to any kind of risks and vulnerabilities as we make sure to protect the company from exploitation of any criminal elements by strict adherence with the standards set by the Insurance Commission as its primarily regulating agency.

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

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

Answer

- The company has yet to conduct an over-all assessment of the level of its compliance with the Anti-Money Laundering act of 2001 and other relevant laws and regulations.

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

Answer

- No assessment has yet been made by the company, nonetheless, it will seek guidance from the experts in the field and appropriate government agencies to better ascertain the state of its operation and compliance.

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

Answer

- No deviation from the pre-set guidelines because all corporate activities conforms to the standards set by laws and regulations.

- d. Has your entity recently undergone an internal audit on AML and

CTF Compliance? If yes, please summarize the key findings and/or recommendations that were noted in the most recent internal audit report and set out the measures that the BOD has undertaken to address these findings and to monitor the same.

Answer

-No internal audit on AML and CTF compliance was done by the company as it is still working on the process and framework to undertake such assessment

KEY FINDINGS	RECOMMENDED ACTIONS	PROGRESS/ DEVELOPMENT
None	None	None

- e. Has your entity recently undertaken compliance testing of other departments, units, offices and branches that is independent of the internal audit? If yes, please describe the process (whether on-site inspections were conducted) and summarize the key findings and/or recommendations that were noted in the most recent compliance testing report and set out the measures that the BOD has undertaken to address these findings and to monitor the same.

Answer

- No compliance testing has been done by the company as it is still working on the process and framework to undertake such process

KEY FINDINGS	RECOMMENDED ACTIONS	PROGRESS/DEVELOPMENT
none	none	None

4. Management Information System

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

Answer

- MIS is effective in gathering client’s personal information and business background which is relevant in detecting suspicious transactions. The management information system of the company compiles all the relevant data of the company pertaining to its clients information, armed with such information the company can cross check, verify and investigate the business transaction of its client to other entities and government agencies which is a very effective tool and monitoring system.

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

Answer

- Monthly production reports made by the underwriting departments and signed by its department head, specifying

the name of the clients, type of business transaction, products secured and amounts involved are being reported to the to the BOD and approved committee to assist them in their decision making process relative to ML and TF prevention.

- At present, no reports on suspicious individuals or entities has been made. The company has no experience on suspicious transactions as many of its business deals with longtime and established clients
- c. Does the entity keep annual statistics on red flags systems alerts, ML investigations, CT reports, ST reports broken down as to the nature? If so, which Office requires and maintains the same? Please provide copies of the statistics.
- ISAC will keep an annual statistics if there are suspicious transactions.
- d. Does the entity keep track dispositions of red flag systems alerts? If so, which Office requires and maintains the same? Please provide copies of the tracking report.
- ISAC has not encountered any suspicious transactions.

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

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

Answer

1. MA. DOLORES R. APOSTOL
VP-Finance/Accounting
Compliance Officer
2. ATTY. RODRIGO DE REAL, JR.
AVP-LEGAL/BONDS
Alternate Compliance Officer
3. LOUGINA EUSEBIO
HR MANAGER
Record keeper

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

Branches?

Answer

- As a medium size non-life insurance company, we created a composite group to form a compliance team. This is composed of supervisors and managers representing each department who will review, implement and monitor all corporate activities to make sure that it conforms and abides with the existing laws and regulations. Frequent visit to the websites of FATF and other competent regulators is a practice to update us of individuals and entities included in the sanction list for the company to avoid and prevent dealing with them.

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

Answer

- All approved policies by the BOD are cascaded to the senior management level for proper channeling and implementation to all departments in compliance with the standards. If there are relevant findings on the assessment of the clients, the compliance officer who oversees the compliance program will directly report to the President of the company to review and properly assess the findings.

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

Answer

- The employees and senior officers are required to attend seminars sponsored by the BSP and Insurance Commission to increase awareness about the anti-money laundering act and other relevant laws. Their knowledge is shared with others for them to properly assess on what to look for in every client transaction.

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

Answer

- The company adopts and apply the "Fit and Proper Standards" on all of its personnel, officers, employees and members of the Board wherein they all must have integrity, technical expertise and experience in the institution's business, which should be the key considerations in the selection process for the position or acquisition they are applying for. Consequently, the company is vetting all the candidates by proper identification and verification of information using independent sources, document and data. The company only invites persons we know of good moral character to be part of our entity.

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

Answer

- ISAC Personnel Department screens new applicants initially by requiring the applicants to submit their application forms with supporting documents. Thereafter, the personnel department will conduct the vetting and verification process to screen all the applicants. If the applicant was previously employed the human resources department will check with its previous employer or representative. Finally, a background investigation is conducted in the place of residence or office of previous employer of the applicant.

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

Answer

- Yes the Directors and senior management are subject to fit and proper requirement as provided in the Corporate Governance Manual Art.III (I.3) and "H-15" of the company viz;

"Directors shall Act honestly, in good faith, and with loyalty to the best interest of the institution, its stockholders, (regardless of the amount of their stockholdings) and other stakeholders such as its policyholders, investors, borrowers, other clients and the general public. A director must always act in good faith with care which an ordinarily prudent man would exercise under similar circumstances, while a director shall always strive to promote the interest of all stockholders. He shall also give due regard to the rights and interests of other stakeholders"

15. "Apply fit and proper standards on personnel. It must have integrity, technical expertise and experience in the institution's business, either current or planned, which should be the key considerations in the selection process"

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

Answer

- Not applicable since our company has no foreign branches.

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

Answer

- Not applicable since our company has no foreign branches

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

Answer

- The MTPP soft copy is disseminated to relevant employees by email. These officers are obligated to implement compliance measures and are checked by the compliance officer on a monthly basis or when an issue arises.

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

Answer

- The Compliance Office of the company manages an effective and continuous AML/CTF training program for all directors, officers and employees for them to comply with their duties and obligations under the AMLA Guidelines. In addition regular monitoring of different departments is being undertaken by the compliance officer to ensure attainment of the company’s plans and objectives relative to ML and TF prevention

6. *NattzeOfW’eaknesses/NotecfAndAbilityToAddressExistingAnd Potential Risks and Problems*

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

Answer

- None

KEY FINDINGS	RECOMMENDED ACTIONS	PROGRESS/DEVELOPMENT
None		

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

Answer

- None

7. *Institutional Risk Assessment*

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

Answer

- None

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

Answer

- None

KEY FINDINGS	RECOMMENDED ACTIONS	PROGRESS/DEVELOPMENT
None		

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

Answer

- No risk assessment was conducted by the company as it is still in the process of formulating the framework and mechanisms to undertake such risk assessment

B. MONEY LAUNDERING AND TERRORIST FINANCING PREVENTION PROGRAM

1. Customer ie/enf//l/call/on, Verification and Ongoing Monitoring Process

- a. Does the entity apply a risk-based approach to combating money laundering and terrorist financing? If so, please provide an overview of these policies and procedures. The overview should (1) portray the entity’s philosophy towards risk-based (does it form an integral part of the entity's business framework?), (2) indicate how the relevant risk assessments are undertaken and their bases to help determine the policy and its practical application, and (3) describe the mechanism by which permitted variations from the generally applicable standards are promulgated, and what arrangements, if any, are in place to monitor the continuing suitability of the exceptions. Please provide the basis in the entity’s MTPP.

Answer

- In the recruitment process, adopting the risk based screening, only competent and qualified employees with no criminal record are employed in the company.
- Adopt an independent audit program to ensure the accuracy of information obtained from the clients.

- Designation of a compliance officer who will oversee the implementation of the program to the entire organization.
- Continuing educational or training program for the employees with regards to AMLA program.

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

Answer

- No, the company does not authorize and allow the opening of anonymous accounts, accounts in fictitious names and other accounts not otherwise under the true and full name of the customer/client

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

- i. Establishing business relations? - Yes
- ii. Carrying out transactions with non-clients? - Yes
- iii. Carrying out occasional transactions? - Yes
- iv. Dealing with trustee, nominee, agent, or intermediary, applying CDD not only on the latter but also on the trust or principals? = Yes
- v. Dealing with juridical entities that have no business substance in their own right but through which transactions may be conducted, applying CDD on the entities' beneficial owner?
 - The company does not deal with juridical entities that have no business substance in their own right
- vi. The entity has doubts about the veracity of previously obtained customer identification document or data? Yes

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

Answer

- When conducting Customer Due Diligence (CDD), we adhere to the company's KYC guidelines wherein initially, we require the client to fill up the Application Form to obtain basic personal information and submit valid gov't ID's to check the authenticity of his/her identity. For the Corporation, audited FS, current GIS business registration from DTI if single proprietor and SEC for corporation and other pertinent documents needed to verify the legality of the business. We conduct verify the information submitted by the clients by confirming the same from independent sources. The company representative will call and confirm with third persons to confirm the information provided by the clients and if possible ocular inspection will be undertaken.

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

insurance policies? Please describe in detail the CDD process and the specific provision in the MTPP that apply.

Answer

- Not applicable

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

Answer

1. For individual person the following information are required to be filled-up in our application form :

Name of the customer, date and place of birth, present and permanent address; contact number or information, nationality, valid government id's, nature of work, name of employer or nature of self-employment. Business Name Registration, Tax Identification Number

If the customer is a foreign national, we require current passport, Alien Certificate of registration, alien employment permit or any government issued identity.

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

Answer

-For Juridical persons, we require the potential client to submit the following, articles of incorporation general information sheet, audited financial statement, company structure, Board Resolution Secretary's Certificate for the signatories, proof of ownership of properties and accomplished work and previous clients, list of creditors and suppliers. We also require the applicant to fill up the application form to obtain basic information about the nature of business, the sources of funds ,the beneficial owner and other documents like business permit from LGU,BIR, DTI certificate of registration and other pertinent documents issued by the government and special power of attorney, if applicable.

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

Answer

- Yes, the company tries to determine the identity of the beneficial owner of the juridical entities by requiring them to submit a written document writing documents stating beneficial owner therein and to submit the following, articles of incorporation general information sheet, audited financial statement, company structure, Board Resolution Secretary's Certificate for the signatories, proof of ownership of properties and accomplished work and previous clients, list of creditors and suppliers. We also require the applicant to fill up the application form to obtain basic information about the nature of business, the sources of funds, the beneficial owner and other documents like business permit from LGU, BIR, DTI certificate of registration and other pertinent documents issued by the government and special power of attorney, if applicable
- .
- h. Does your entity verify the true identity of customers, including validating the truthfulness of the information and confirming the authenticity of the identification documents presented, submitted and provided by the customer, using reliable and independent sources, documents, data, or information? If yes, please describe in detail including the specific internal policy provisions.

Answer

- Yes, as provided in the underwriting guidelines of the company our personnel are required to verify the true identity of the customers and to validate the authenticity of the documents they submitted as mentioned-above.
- i. Does your entity verify that any person purporting to act on behalf of a customer is so authorized, and identify and verify the identity of that person? If yes, please describe in detail including the specific internal policy provisions.

Answer

- Yes, pursuant to the underwriting guidelines of the company, we are required to verify the authorization given to a prospective client who is acting on behalf of the customer or other person. A notarized special power of attorney, authorization letter with proper proof of identification is a must and an indispensable requirement before we deal with them. If the client is a juridical entity the Secretary's Certificate, Board Resolution and proof of identification of the client and his principal is being required by the company.
- j. Does your entity identify the beneficial owner and take reasonable measures to verify the identity of the beneficial owner, using the relevant information or data obtained from reliable sources, such that the entity is satisfied that it knows who the beneficial owner is? If yes, please describe in detail including the specific internal policy provisions.

Answer

- Yes, pursuant to the underwriting guidelines of the

company, we are required to take reasonable measures to verify the identity of the beneficial owner by demanding documentary requirements such as but not limited to statement under oath of the beneficial owner, articles of incorporation general information sheet, audited financial statement, company structure, Board Resolution Secretary's Certificate for the signatories, proof of ownership of properties and accomplished work and previous clients, list of creditors and suppliers. We also require the applicant to fill up the application form to obtain basic information about the nature of business, the sources of funds, business permit from LGU, BIR, DTI certificate of registration and other pertinent documents issued by the government. A notarized special power of attorney, authorization letter with proper proof of identification is a must and an indispensable requirement before we deal with them. If the client is a juridical entity the Secretary's Certificate, Board Resolution and proof of identification of the client and his principal are also required by the company.

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

Answer

- Yes, the company is mandated by the Insurance Commission under the principle of "Know Your Client" to obtain relevant information for the purpose and the intended subject business transaction. The same information is protected under the Data Privacy and Protection Act which the company adheres to. The information given by the client will only be used by the company specific to the subject business transaction which the client is availing from the company and shall not be allowed for any use for any other purpose other than what the client requires from the company.

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

Answer

- Yes, the company conducts an on-going due diligence to its existing customers on the basis of materiality and risk so as to monitor the compliance of the company to relevant laws and rules particularly the anti-money laundering and FT laws. The company requires its customers to update its existing documentation and divulge if any should be updated because of the substantial change in the compliance requirements.

- m. Does your entity perform enhanced due diligence for higher risk categories of customer, business relationship or transaction and does it apply to existing customers? If yes, please explain Including reference to the list of customers considered as high-risk, criteria and factors considered in applying EDD, types of measures required,

control mechanisms for managing the risks associated with dealing with these customers, validation procedures and the specific internal policy provisions. Also, provide number of high-risk customers per category.

- The company has yet to encounter clients in the higher risk categories as most of our clients are already long established with proven track record. Nonetheless, if we will encounter such categories of clients we will apply enhanced due diligence for them particularly those that come from a country recognized as having inadequate internationally accepted AML standards. Frequent visits to the websites from reliable regulators and competent authorities showing list of individuals and entities included in the sanction list increases the awareness of the entity about criminal elements.

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

Answer

- No, the company does not apply reduced due diligence when there is low risk of ML and TF as the standard set by the company is for all of its clients so the required due diligence is the same. The underwriting guidelines set by the company is applicable to all our clients, the same documentary requirements such as but not limited to articles of incorporation, general information sheet, audited financial statement, company structure, Board Resolution, Secretary's Certificate for the signatories, proof of ownership of properties and accomplished work and list of previous clients, list of creditors and suppliers. We also require the applicant to fill up the application form to obtain basic information about the nature of business, the sources of funds, business permit from LGU, BIR, DTI certificate of registration and other pertinent documents issued by the government. A notarized special power of attorney, authorization letter with proper proof of identification is a must and an indispensable requirement if the client is acting for and in behalf of another person. If the client is a juridical entity, the Secretary's Certificate, Board Resolution and proof of identification of the client and his principal are also required by the company.

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

Answer

- We may outsource the conduct of customer Identification and due diligence to a reliable intermediary or agent. It is the responsibility and accountability of the Company to keep the identification documents of the clients. In the alternative, the company will not proceed with the business transaction for that specific client whose CDD measures are incomplete as

it will be in violation of the established rules and regulations mandated by the governing authorities

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

Answer

- Before commencing an account or establishing business relationship with high risk clients, approval from the senior management level is required. Data obtained from high risk clients are kept confidential and treated carefully. Enhanced due diligence will be enforced and this will include obtaining additional information from them like obtaining list of banks accounts they maintain, list of companies where they held positions as director stockholder or officer.

- The underwriting guidelines set by the company is applicable to all our clients, the same documentary requirements such as but not limited to articles of incorporation general information sheet, audited financial statement, company structure, Board Resolution, Secretary's Certificate for the signatories, proof of ownership of properties and accomplished work and list of previous clients, list of creditors and suppliers. We also require the applicant to fill up the application form to obtain basic information about the nature of business, the sources of funds, business permit from LGU, BIR, DTI certificate of registration and other pertinent documents issued by the government. A notarized special power of attorney, authorization letter with proper proof of identification is a must and an indispensable requirement if the client is acting for and in behalf of another person. If the client is a juridical entity the Secretary's Certificate, Board Resolution and proof of identification of the client and his principal are also being by the company

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

Answer

- Yes, we allow non-face-to-face transactions but we require them to submit the necessary documents needed for proper identification. In addition, remote selling or off-site, video conference can be availed by the company. Incomplete documents will not be entertained by the company.

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

Answer

- Yes, the company allows third parties, referral by brokers, intermediaries, fiduciaries, affiliates, subsidiaries and the like but we make sure that the third party shall be a covered person under Section 3 of the AMLA and for them to comply with the existing IC rules pertaining to license requirement of brokers and agents

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

Answer

- Yes, as indicated in the broker's agreement or insurance agency agreement approved by the Insurance Commission the brokers and agents are obliged to conduct CDD process however, the company is still verifying all the information and documents submitted by the third parties.

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

Answer

No, the company does not allow the outsourcing of CDD process as we adhere to the "Know your Client Principle" being required by the Insurance Commission. Information obtained from third party source such as brokers and agents are still subject for verification by the company

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

Answer

Not applicable as the company is not dealing with foreign clients or entities not covered by AML and CTF standards.

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

Answer

- The company regularly visits the websites of domestic regulators by way of updating the entities about the AML and CTF information and issues.

- Compliance officer consistently updates information pertaining to AML and CTF laws

q. Are there measures in place to ensure that funds collected by or transferred through non-profit organizations are not diverted to support the activities of terrorists or terrorist organizations? If so, please specify what these measures are and indicate the specific policy provisions.

Answer

- Not applicable, as the company is not dealing with non-profit organizations.

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

Answer

- The company is committed to help the government to combat the anti-money laundering activities of criminal elements by way of detecting, identifying and reporting these suspicious transactions to the regulators to prevent and stop the funding of illegal activities.

2. Record Keeping And Retention Process

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

Answer

- ISAC maintains records in an orderly and organized manner wherein all data obtain from the clients are well kept such as articles of incorporation, general information sheet, audited financial statement, company structure, Board Resolution, Secretary's Certificate, proof of ownership of properties and accomplished work and list of previous clients, list of creditors and suppliers. All documents obtained by us in the regular course of business are filed and kept accordingly and updated when necessary. These include the company's records and documents and our clients'.

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

Answer

- We maintain the records for five years based on the standards set by the BIR and IC. The records custodian of the company is in charge of safe-keeping the documents

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

Answer - For at least five (5) years

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

Answer: - Yes they are readily available.

3. Covered/ And Suspicious Transaction Reporting

- a. Do you have an electronic money laundering transaction monitoring system in place? If yes, is it internally developed or purchased from a vendor, and does it have the following automated functionalities?
- i. Covered and suspicious transaction monitoring — performs statistical analysis, profiling and able to detect unusual patterns of account activity;
 - ii.
 - ii. Watch list monitoring — checks transfer parties (originator, beneficiary, and narrative fields) and the existing customer database or any listed undesirable individual or corporation;
 - iii. Investigation - checks for given names throughout the history of payment stored

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

Capable of aggregating activities of a customer with multiple accounts on a consolidated basis for monitoring and reporting purposes; and
Has the capability to record all STs and support the investigation of alerts generated by the system and brought to the attention of senior management whether or not a report was filed with the AMLC.

Answer

No, the company has no electronic money laundering transaction monitoring system in place.

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

Answer

- As an alternative to the electronic money laundering transaction monitoring system the company is adhering to the standard guidelines of AMLA Compliance Framework and by visiting the websites of FATF and other international competent authorities for the update of the sanction list.

- c. Do you pay special attention to unusual transactions? If yes, how do you define unusual transactions? And what type of special measures

do you implement in managing them? Please indicate the specific internal policy provisions for this requirement.

Answer

- The company has not encountered any unusual transactions as almost all of its clients are established and longtime clients. Since we our transactions have been in the usual course of business for many years with more or less familiar clients, we will be able to readily see an unusual transaction.

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

Answer

- Yes we are required by the regulating body –Insurance Commission, to report any suspicious transactions which may fall under the AMLC laws. The Compliance Officer is tasked to file the proper reports to the regulating agencies concerned and render a report to the Board for any STR activity which may involve the company or any of its clients.

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

Answer

- Yes we are required by the regulating body –Insurance Commission, to report any suspicious transactions that may involve funds related to terrorism. The Compliance Officer is tasked to file the proper reports to the regulating agencies concerned and render a report to the Board for any STR activity which may involve the company or any of its clients

F

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

Answer

- The company has not encountered any suspicious transaction (STR) so far in its operation.

G .

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

Answer

- No administrative, criminal or Civil proceedings will be filed against the employee concerned under the whistle blowing policy being drafted by the company, the employee who will report such

activities prohibited under the AML laws will be provided with legal and financial assistance.

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

Answer

- The employees or officers concerned are encourage first to report any STR, CTR related information to the management or directly to the President or Chairman of Board before divulging the said fact to any person outside the company as it will remain as confidential information until formally acted upon.

4. Employment And Training Program

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

Answer

- The "Fit and Proper Rule" is the standard and principle being applied by the company on all of its personnel, officers, employees and members of the Board wherein they all must have integrity, technical expertise and experience in the institution's business, which should be the key considerations in the selection process for the position or acquisition they are applying for Background check and vetting procedures are undertaken by the company to properly screen all its employees and officers
- b. Please describe the entity's AML training and refresher program with specific references to the level of training and focus on the participant, the Office tasked to implement the program, the financial, human and technical support that that Office has been given and frequency of offering.

Answer

- The company avails of the training programs and seminars offered by relevant government agencies such as the Insurance Commission, BSP and AMLC for its employees to increase their knowledge and awareness on AMLA compliance measures. In addition, the company is drafting a policy to institutionalize the yearly program and activities related to AMLC laws.
- c. Are the staff of the Compliance Office and Internal Audit Office provided with training for combating money laundering and terrorist financing that is different from the staff of other offices? Please give details.

Answer

- Yes, the staff of Compliance and Audit Office are given preference and priority in trainings and seminars related to money laundering and terrorist financing as they are in the forefront to prevent such transactions from occurring within the company.
- d. Do you have a non-going employee training on AML and CTF? If

yes, please indicate the last employee training on AML and CTF and the schedule for the year as well as the specific policy provisions for this requirement.

Answer

The company is still in the process of drafting the policy to institutionalize the yearly training and program to be given to the employees

C. INTERNAL CONTROLS AND AUDIT

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

Answer

- The auditor has the support of our Board of Directors in evaluating the performance of each Department if they adhere to the AMLA guidelines . The auditor scope is to check the accuracy of customer identification process and all other reports and internal controls pertaining to the compliance with AML/CTF. The frequency of audit must be done at least once in every two years.
 - Under the corporate governance manual of the company, the Board is required to establish an Audit Committee that will provide a framework for performing and promoting a broad range of value-added internal audit activities and foster improved organizational processes and operations.
2. Do you establish and maintain internal procedures, policies and controls to prevent ML and TF? How do you communicate these to the officer, staff and employees? Please provide details with reference to the applicable policy provisions.

Answer

Internal procedures is a must to an entity to ensure day to day compliance with AML standards. Communication can be done by using information technology like using the computers wherein we can send emails and other tools to disseminate the information easily and conveniently.

3. Do you maintain an adequately resourced and independent audit function that tests compliance with these procedures, policies and controls? If yes, please indicate the available resources, financial, human, and technical and the specific policy provisions for this requirement.

-Currently, our external auditor Reyes Tacandong Co. tests our compliance with procedures. Their evaluation of our compliance will be found in their annual report for the company.

D.

IMPLEMENTATION

1. Covered ***And Suspicious Transaction Reporting Policies And***

Procedures

- a. Do you have an electronic money laundering transaction monitoring system in place? If yes, is it internally developed or purchased from a vendor, and does it have the following automated functionalities?
- i. Covered and suspicious transaction monitoring — performs statistical analysis, profiling and able to detect unusual patterns of account activity;
 - ii. Watch list monitoring - checks transfer parties (originator, beneficiary, and narrative fields) and the existing customer database for any listed undesirable individual or corporation;
 - iii. Investigation — checks for given names throughout the history of payment stored in the system;
 - IV. Can generate all the CTRs of the ICREs accurately and completely with all the mandatory field properly filled up;
 - V. Must provide a complete audit trail;
 - vi. Capable of aggregating activities of a customer with multiple accounts on a consolidated basis for monitoring and reporting purposes; and
 - vii. Has the capability to record all STs and support the investigation of alerts generated by the system and brought to the attention of senior management whether or not a report was filed with the AMLC.

Answer - None

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

Answer

- The company manually performs the functions mentioned above and follows the procedures and guidelines of the Insurance Commission and relevant AMLC laws

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

Answer

- The company has yet to encounter unusual transactions in its operation as most of its clients are repeat and longtime clients with established track records in business.

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

Answer

- Yes, if the Company detects and identify suspicious transactions. This will be brought to the attention of the compliance officer for further action if necessary. Thereafter, we will follow rules and regulations required of us.

- e. Does the obligation to make an STR also apply when you suspect or have reasonable grounds to suspect that funds are related to terrorism? If yes please describe the scope of this obligation, the decision process and the decision maker within the entity.

Answer

Yes, same procedure applies to money laundering in financial terrorism, the compliance officer will submit the report to the Board, Insurance Commission and AMLC.

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

Answer – None. The company has yet to encounter STR

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

Answer:

Under the whistle blowing policy being adopted by the company, the employee and officers concerned will be provided with financial and legal assistance for reporting the STR.

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

Answer

None so far since there have been no suspicious transactions encountered by the company.

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

Answer

None so far since there have been no suspicious transactions encountered by the company.

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

Answer

- The employees and officers are discouraged to relay the said information other than to relevant government agencies concerned like the AMLC, as the said information should be treated as confidential information for verification.

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

- j. Does your entity undertake customer due diligence (CDD) measures when:
- i. establishing business relations? YES
 - ii. carrying out transactions with non-clients? YES
 - iii. carrying out occasional transactions? YES
 - iv. dealing with trustee, nominee, agent, or intermediary, applying CDD not only on the latter but also on the trust or principals?

YES

- v. dealing with juridical entities that have no business substance in their own right but through which financial transactions may be conducted, applying CDD on the entities' beneficial owner? YES
- vi. the entity has doubts about the veracity of previously obtained customer identification document or data?
= yes
- k. Does your entity undertake customer due diligence (CDD) measures on the beneficiary(ies) of life insurance and other investment related insurance policies? = n/a
- C. Does your entity identify the beneficial owner of juridical entities dealing with the entity and verify the information acquired? = yes
- d. Does your entity verify the true identity of customers, including validating the truthfulness of the information and confirming the authenticity of the identification documents presented, submitted and provided by the customer, using reliable and independent sources, documents, data, or information? - yes
- e. Does your entity verify that any person purporting to act on behalf of a customer is so authorized, and identify and verify the identity of that person? - yes
- f. Does your entity identify the beneficial owner and take reasonable measures to verify the identity of the beneficial owner, using the relevant information or data obtained from a reliable sources, such that the entity is satisfied that it knows who the beneficial owner is?
- yes
- g. Does your entity understand and, as appropriate, obtain information on, the purpose and intended nature of the account, transaction, or the business relationship with its customers? - YES. see previous answer
- h. Does your entity, on the basis of materiality and risk, conduct ongoing due diligence on the business relationship of existing customers?

- yes
- i. Does your entity perform enhanced due diligence for higher risk categories of customer, business relationship or transaction and does it apply to existing customers? - YES
- j. Does your entity apply reduced due diligence where there is low risk of ML or TF? What does your entity do in cases where it is unable to complete the CDD measures required by existing internal rules or under CL 2018-48, as amended, the AMLA, as amended, and its IRR? - No. Please see above previous answer.
- k. What does your entity do in cases where it is unable to complete the CDD measures required by existing internal rules or under the CL 2018-48, as amended, the AMLA, as amended, and its IRR?

- Please see previous answer.
- l. In case of non-face-to-face services, does the entity ensure that control measures to address risks associated with this type of business relationships or transactions are implemented? – Yes, please see previous answer.

2. Record Keeping/Retention Policies And Procedures

- a. What are the type of records and information that your entity maintains?
= manual filing of documents and maintained in an organized and confidential manner. Please see previous answer.
- b. Do you maintain all necessary records on transactions and, if so, for how long following completion of the transaction? Who is/are the designated custodian that shall be accountable and responsible for safekeeping these documents?

Answer

- The company keeps its records for at least 5 years. The Compliance Composite team are the custodians of the records. Please see previous answer.
- c. Do you maintain records of the identification documents and information, account files and business correspondence and, if so, for how long following the termination of an account or business relationship? = 5 years
 - d. Do you ensure that all customer and transaction records and information are available on a timely basis to competent authorities? If yes, please indicate the designated custodian that shall be accountable and responsible for safekeeping and making these records available.

Answer

- Compliance team will provide the records and will make sure that it is readily available for the competent authorities.
- e. Do you conduct compliance testing to ensure that all units and/or branches maintain and safely store KYC and transaction records?

Answer

The company has yet to conduct compliance testing.

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

3. Continuing Education And Training Program

- a. Are newly hired employees required to attend AML and CTF training?
Yes, if there are available seminars and trainings from an institution.
- b. Is there an existing training and refresher program for all responsible directors, officers and staff? Please provide a copy of the program.

Answer

- None, as this time as the company is still drafting the policy to institutionalize the yearly training program for officers, directors and employees
- c. Are the staff of the Compliance Office and Internal Audit Office

provided with training for combating money laundering and terrorist financing that is different from the staff of other offices?

Answer

The compliance and audit team are given priority by the company to attend seminars provided by IC, BSP and AMLC .`

- d. Do you have a non-going director and employee training on ML and TF prevention? If yes, please indicate the last training and the schedule for the year.- None
- e. Do you conduct a regular post-test on directors and employees to gauge their understanding of AMLA, as amended, its IRR, CL 2018-48, as amended, and other IC and AMLC relevant regulations?- None
- f. Provide statistics on education and training provided to responsible directors, officers and employees covering the immediately preceding year.- None

Classification (e.g. new employees; regular employees; board of directors; agents; officers; etc.)	Total Number Per Classification	Number of Training Hours	Date of Training	Number of directors, officers and employees who completed the training
none				

D. ICRE DATA/INFORMATION

- 1. Provide information on the total asset of the entity as of 31 December of the immediately preceding year.
= year 2019= 1,289,388,414
- 2. Provide a list of all products being offered/sold according to classification by the ICRE.
Fire, Bonds, Motor Car, Casualty, Marine Cargo & Engineering Lines
- 3. Provide data/ information on products covering the immediately preceding year.

- Separate attachments

Product Classification	Total Premium/ Contract Price/ Membership Fees Received	Number of Issued or Sold Policies/Pre-Need Plans/ HMO Agreements	Number Outstanding Policies/ Pre-Need Plans/ HMO Agreements	Number of Policies/ Pre-Need Plans/ HMO Agreements Surrendered/ Cancelled/ Lapsed

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

Type of Report	Number of Reports Submitted
Suspicious Transaction Reports	none
Covered Transaction Reports	none

CERTIFICATION

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

Signed in the City of MAKATI CITY on the JUL 30 2021 20__



ATTY. AURORA ROSARIO A. ORETA

PRESIDENT

Signature over printed name



MA. DOLORES R. APOSTOL

AML AND CTF COMPLIANCE OFFICER

Signature over printed name

MAKATI CITY

SUBSCRIBED AND SWORN to before me this JUL 30 2021 day of _____, 20__, by the following who are all personally known to me (or whom I have identified through competent evidence of identity) and who exhibited to me the irrespctive identification

NAME	ID NO.	DATE/PLACE ISSUED
1. AURORA ROSARIO A. ORETA	IBP - 06327	LIFE TIME MEMBER
2. MA. DOLORES R. APOSTOL	PRC - 0071004	DECEMBER 16, 2016

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FELIPET. LLEDAN JR.

Notary Public for and in Makati City

Until Dec. 31, 2022, Appt. No. M-09

Roll No. 27625, TIN 136897808

Rm. 412, 4th Flr. VGP Center, Ayala, Makati City

2021 PTR No. Mla 9792919, 15/7/2020

IBP No. 119432, 06/17/2020

MCLE Compliance No. VI-0012066