

C.1	The rights of stakeholders that are established by law or through mutual agreements are to be respected.	Y/ N	Reference / Source document
<i>Does the company disclose a policy that :</i>			
C.1.1	Stipulates the existence and scope of the company's efforts to address customers' welfare?	N	
C.1.2	Explains supplier/contractor selection practice?	Y	Source: www.acegroup.com Investor Information; Corporate Governance; Highlights; Integrity First: The ACE Code of Conduct  <a href="http://investors.acegroup.com/files/doc_downloads/Governance%20Documents/Integrity%20First%20-%20The%20ACE%20Code%20of%20Conduct%20-%20December,%202012.pdf">http://investors.acegroup.com/files/doc_downloads/Governance%20Documents/Integrity%20First%20-%20The%20ACE%20Code%20of%20Conduct%20-%20December,%202012.pdf</a>
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	Source: www.acegroup.com Investor Information; Corporate Governance; Highlights; Integrity First: The ACE Code of Conduct  <a href="http://investors.acegroup.com/files/doc_downloads/Governance%20Documents/Integrity%20First%20-%20The%20ACE%20Code%20of%20Conduct%20-%20December,%202012.pdf">http://investors.acegroup.com/files/doc_downloads/Governance%20Documents/Integrity%20First%20-%20The%20ACE%20Code%20of%20Conduct%20-%20December,%202012.pdf</a>

C.1.4	Elaborates the company's efforts to interact with the communities in which they operate?		Y	Source: www.acegroup.com Investor Information; Corporate Governance; Highlights; Integrity First: The ACE Code of Conduct  <a href="http://investors.acegroup.com/files/doc_downloads/Governance%20Documents/Integrity%20First%20-%20The%20ACE%20Code%20of%20Conduct%20-%20December,%202012.pdf">http://investors.acegroup.com/files/doc_downloads/Governance%20Documents/Integrity%20First%20-%20The%20ACE%20Code%20of%20Conduct%20-%20December,%202012.pdf</a>
C.1.5	Describe the company's anti-corruption programmes and procedures?		Y	Source: www.acegroup.com Investor Information; Corporate Governance; Highlights; Integrity First: The ACE Code of Conduct  <a href="http://investors.acegroup.com/files/doc_downloads/Governance%20Documents/Integrity%20First%20-%20The%20ACE%20Code%20of%20Conduct%20-%20December,%202012.pdf">http://investors.acegroup.com/files/doc_downloads/Governance%20Documents/Integrity%20First%20-%20The%20ACE%20Code%20of%20Conduct%20-%20December,%202012.pdf</a>
C.1.6	Describes how creditors' rights are safeguarded?		N	
<b><i>Does the company disclose the activities that it has undertaken to implement the above mentioned policies?</i></b>				
C.1.7	Customer health and safety	OECD Principle IV (A) & Global Reporting Initiative	N/A	

C.1.8	Supplier/Contractor selection and criteria
C.1.9	Environmentally-friendly value chain

Y	<p>Source: www.acegroup.com Investor Information; Corporate Governance; Highlights; Integrity First: The ACE Code of Conduct, page 23</p> <p><a href="http://investors.acegroup.com/files/doc_downloads/Governance%20Documents/Integrity%20First%20-%20The%20ACE%20Code%20of%20Conduct%20-%20December,%202012.pdf">http://investors.acegroup.com/files/doc_downloads/Governance%20Documents/Integrity%20First%20-%20The%20ACE%20Code%20of%20Conduct%20-%20December,%202012.pdf</a></p>
Y	<p>Source: www.acegroup.com Investor Information; Corporate Governance; Highlights; Integrity First: The ACE Code of Conduct, page 30</p> <p><a href="http://investors.acegroup.com/files/doc_downloads/Governance%20Documents/Integrity%20First%20-%20The%20ACE%20Code%20of%20Conduct%20-%20December,%202012.pdf">http://investors.acegroup.com/files/doc_downloads/Governance%20Documents/Integrity%20First%20-%20The%20ACE%20Code%20of%20Conduct%20-%20December,%202012.pdf</a></p> <p>Source: www.acegroup.com Philippines; About ACE; Corporate Social Responsibility</p> <p><a href="http://www.acegroup.com/ph-en/about-ace/corporate-social-responsibility.aspx">http://www.acegroup.com/ph-en/about-ace/corporate-social-responsibility.aspx</a></p>

C.1.10	Interaction with the communities		Y	<p>Source: www.acegroup.com Investor Information; Corporate Governance; Highlights; Integrity First: The ACE Code of Conduct, page 27</p> <p><a href="http://investors.acegroup.com/files/doc_downloads/Governance%20Documents/Integrity%20First%20-%20The%20ACE%20Code%20of%20Conduct%20-%20December,%202012.pdf">http://investors.acegroup.com/files/doc_downloads/Governance%20Documents/Integrity%20First%20-%20The%20ACE%20Code%20of%20Conduct%20-%20December,%202012.pdf</a></p> <p>Source: www.acegroup.com Philippines; About ACE; Corporate Social Responsibility</p> <p><a href="http://www.acegroup.com/ph-en/about-ace/corporate-social-responsibility.aspx">http://www.acegroup.com/ph-en/about-ace/corporate-social-responsibility.aspx</a></p>
C.1.11	Anti-corruption programmes and procedures		Y	<p>Source: www.acegroup.com Investor Information; Corporate Governance; Highlights; Integrity First: The ACE Code of Conduct, page 10</p> <p><a href="http://investors.acegroup.com/files/doc_downloads/Governance%20Documents/Integrity%20First%20-%20The%20ACE%20Code%20of%20Conduct%20-%20December,%202012.pdf">http://investors.acegroup.com/files/doc_downloads/Governance%20Documents/Integrity%20First%20-%20The%20ACE%20Code%20of%20Conduct%20-%20December,%202012.pdf</a></p>
C.1.12	Creditors' rights		N/A	

C.1.13	Does the company have a separate corporate responsibility (CR) report/section or sustainability report/section?	<p><b>OECD Principle V (A):</b> Disclosure should include, but not be limited to, material information on: (7) Issues regarding employees and other stakeholders.</p> <p>Companies are encouraged to provide information on key issues relevant to employees and other stakeholders that may materially affect the long term sustainability of the company.</p>	Y	<p>Source: www.acegroup.com Philippines; About ACE; Corporate Social Responsibility</p> <p><a href="http://www.acegroup.com/ph-en/about-ace/corporate-social-responsibility.aspx">http://www.acegroup.com/ph-en/about-ace/corporate-social-responsibility.aspx</a></p>
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C.2	<b>Where stakeholder interests are protected by law, stakeholders should have the opportunity to obtain effective redress for violation of their rights</b>			
C.2.1	Does the company provide contact details via the company's website or Annual Report which stakeholders (e.g. customers, suppliers, general public etc.) can use to voice their concerns and/or complaints for possible violation of their rights?	<p><b>OECD Principle IV (B):</b> Where stakeholder interests are protected by law, stakeholders should have the opportunity to obtain effective redress for violation of their rights.</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>	Y	<p>www.acegroup.com Media Center; Media Contacts <a href="http://www.acegroup.com/Media-Center/Media-Contacts.html">http://www.acegroup.com/Media-Center/Media-Contacts.html</a></p> <p>Source: www.acegroup.com Philippines; Media Center; Media Contact <a href="http://www.acegroup.com/ph-en/media-center/media-contact.aspx">http://www.acegroup.com/ph-en/media-center/media-contact.aspx</a></p> <p>Source: www.acegroup.com Philippines; Contact ACE <a href="http://www.acegroup.com/ph-en/contact-ace/">http://www.acegroup.com/ph-en/contact-ace/</a></p>

<b>C.3 Performance-enhancing mechanisms for employee participation should be permitted to develop.</b>				
C.3.1	Does the company explicitly disclose the health, safety, and welfare policy for its employees?	<p><b>OECD Principle IV (C):</b> Performance-enhancing mechanisms for employee participation should be permitted to develop. In the context of corporate governance, performance enhancing mechanisms for participation may benefit companies directly as well as indirectly through the readiness by employees to invest in firm specific skills.</p> <p>Firm specific skills are those skills/competencies that are related to production technology and/or organizational aspects that are unique to a firm.</p> <p>Examples of mechanisms for 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>	Y	Source: www.acegroup.com Investor Information; Corporate Governance; Highlights; Integrity First: The ACE Code of Conduct, page 5  <a href="http://investors.acegroup.com/files/doc_downloads/Governance%20Documents/Integrity%20First%20-%20The%20ACE%20Code%20of%20Conduct%20-%20December,%202012.pdf">http://investors.acegroup.com/files/doc_downloads/Governance%20Documents/Integrity%20First%20-%20The%20ACE%20Code%20of%20Conduct%20-%20December,%202012.pdf</a>
C.3.2	Does the company publish relevant information relating to health, safety and welfare of its employees?		N	
C.3.3	Does the company have training and development programmes for its employees?		Y	Source: www.acegroup.com Careers; Working at ACE: Professional Development  <a href="http://www.acegroup.com/Careers/#Working-at-ACE.html">http://www.acegroup.com/Careers/#Working-at-ACE.html</a>
C.3.4	Does the company publish relevant information on training and development programmes for its employees?		N	

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	Source: www.acegroup.com Investor Information; Shareholder Meeting Materials; 2015 ACE Proxy Statement, pages 66-103  <a href="http://investors.acegroup.com/files/doc_financials/2015/2015-ACE-Limited-Proxy-Statement.pdf">http://investors.acegroup.com/files/doc_financials/2015/2015-ACE-Limited-Proxy-Statement.pdf</a>
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<b>C.4 Stakeholders including individual employee and their representative bodies, should be able to freely communicate their concerns about illegal or unethical practices to the board and their rights should not be compromised for doing this.</b>				
C.4.1	Does the company have procedures for complaints by employees concerning illegal (including corruption) and unethical behaviour?	<b>OECD Principle IV (E):</b> 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.	Y	Source: www.acegroup.com Investor Information; Corporate Governance; Highlights; Integrity First: The ACE Code of Conduct, page 3, Raising Questions and Concerns  <a href="http://investors.acegroup.com/files/doc_downloads/Governance%20Documents/Integrity%20First%20-%20The%20ACE%20Code%20of%20Conduct%20-%20December,%202012.pdf">http://investors.acegroup.com/files/doc_downloads/Governance%20Documents/Integrity%20First%20-%20The%20ACE%20Code%20of%20Conduct%20-%20December,%202012.pdf</a>

C.4.2	Does the company have a policy or procedures to protect an employee/person who reveals illegal/unethical behavior from retaliation?		Y Source: www.acegroup.com Investor Information; Corporate Governance; Highlights; Integrity First: The ACE Code of Conduct, page 2, Commitment to Non-Retaliation <a href="http://investors.acegroup.com/files/doc_downloads/Governance%20Documents/Integrity%20First%20-%20The%20ACE%20Code%20of%20Conduct%20-%20December,%202012.pdf">http://investors.acegroup.com/files/doc_downloads/Governance%20Documents/Integrity%20First%20-%20The%20ACE%20Code%20of%20Conduct%20-%20December,%202012.pdf</a>
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