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S.E.C. Registration Number

G	L	O	B	E		T	E	L	E	C	O	M	,		I	N	C	.				

(Company's Full Name)

T	H	E		G	L	O	B	E		T	O	W	E	R								
3	2	N	D		S	T	R	E	E	T		C	O	R	N	E	R		7	T	H	
A	V	E	N	U	E	,		B	O	N	I	F	A	C	I	O						
G	L	O	B	A	L		C	I	T	Y	,		T	A	G	U	I	G				

Business Address: No. Street City/Town/Province

MARISALVE CIOCSON-CO

Contact Person

797-4269

Company/Telepone Number

1	2

Month

3	1

Day

I-ACGR

FORM TYPE

0	4

Month

2	3

Day

Secondary License Type, If Applicable

C	G	F	D

Dept. Requiring this Doc.

Amended Articles Number/Section

Total Amount of Borrowings

Total No. of Stockholders

Domestic

Foreign

To be accomplished by SEC Personnel concerned

File Number

LCU

Document I.D.

Cashier

STAMPS

Remarks - pls. use black ink for scanning purposes

COVER SHEET

P	W	0	0	0	0	1	1	7	7

S.E.C. Registration Number

G	L	O	B	E		T	E	L	E	C	O	M	,		I	N	C	.				

(Company's Full Name)

T	H	E		G	L	O	B	E		T	O	W	E	R								
3	2	N	D		S	T	R	E	E	T		C	O	R	N	E	R		7	T	H	
A	V	E	N	U	E	,		B	O	N	I	F	A	C	I	O						
G	L	O	B	A	L		C	I	T	Y	,		T	A	G	U	I	G				

Business Address: No. Street City/Town/Province

MARISALVE CIOCSON-CO

Contact Person

797-4269

Company/Telepone Number

1	2

Month

3	1

Day

I-ACGR

FORM TYPE

0	4

Month

2	3

Day

Secondary License Type, If Applicable

M	S	R	D

Dept. Requiring this Doc.

Amended Articles Number/Section

Total Amount of Borrowings

Total No. of Stockholders

Domestic

Foreign

To be accomplished by SEC Personnel concerned

File Number

LCU

Document I.D.

Cashier

STAMPS

Remarks - pls. use black ink for scanning purposes

Globe Telecom, Inc.
The Globe Tower
32nd Street corner 7th Avenue,
Bonifacio Global City,
Taguig, Philippines 1634

+632.7972000

www.globe.com.ph

30 May 2019

SECURITIES AND EXCHANGE COMMISSION
G/F Secretariat Building, PICC Complex
Roxas Boulevard, Pasay City

Attention: **Atty. Rachel Esther J. Gumtang-Remalante**
Officer-In-Charge, Corporate Governance and Finance Department

Mr. Vicente Graciano P. Felizmenio, Jr.
Director, Markets and Securities Regulation Department

THE PHILIPPINE STOCK EXCHANGE, INC.
6/F PSE Tower, 5th Avenue corner 28th Street
Bonifacio Global City, Taguig City

Attention: **Ms. Janet A. Encarnacion**
Head, Disclosure Department

Gentlemen:

In compliance with SEC Memorandum Circular No. 15, Series of 2017 supported by the PSE Memorandum Circular No. 2017-0079 on the Integrated Annual Corporate Governance Report (i-ACGR), we submit to your good offices Globe Telecom, Inc.'s i-ACGR covering the year 2018. The same shall be posted on our company website.

Further, in compliance with the instructions of the Commission, changes or updates to the contents of our i-ACGR for 2018 shall be applied to the report on our website.

Thank you very much.

Very truly yours,

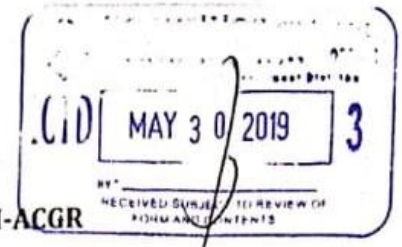
[redacted]

ATTY. MARISALVE CIOCSON-CO
Senior Vice President – Law and Compliance,
Chief Compliance Officer, and Assistant Corporate Secretary

CC: **PHILIPPINE DEALING AND EXCHANGE CORPORATION**
37/F Tower 1, The Enterprise Center
6766 Ayala Avenue corner Paseo de Roxas, Makati City

Attention: **Atty. Joseph B. Evangelista**
Head, Issuer Compliance and Disclosure Department

Securities and Exchange Commission
PHILIPPINES



SEC FORM – I-ACGR

INTEGRATED ANNUAL CORPORATE GOVERNANCE REPORT

1. For the fiscal year ended **31 December 2018**

2. SEC Identification Number **1177** 3. BIR Tax Identification No. **000-768-480-000**

4. Exact name of issuer as specified in its charter **Globe Telecom, Inc.**

5. **Metro Manila, Philippines**
   Province, Country or other jurisdiction of incorporation or organization

6. [ ] (SEC Use Only)
   Industry Classification Code:

7. **27/F The Globe Tower, 32nd Street corner 7th Avenue, Bonifacio Global City, Taguig City**
   Address of principal office

   1634
   Postal Code

8. **(632) 797-2000**
   Issuer's telephone number, including area code

9. **N.A.**
   Former name, former address, and former fiscal year, if changed since last report.

SEC I-ACGR for 2018
GLOBE TELECOM, INC.

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INTEGRATED ANNUAL CORPORATE GOVERNANCE REPORT			
	COMPLIANT/ NON-COMPLIANT	**ADDITIONAL INFORMATION**	**EXPLANATION**
The Board's Governance Responsibilities			
Principle 1: The company should be headed by a competent, working board to foster the long- term success of the corporation, and to sustain its competitiveness and profitability in a manner consistent with its corporate objectives and the long- term best interests of its shareholders and other stakeholders.			
Recommendation 1.1			
1. Board is composed of directors with collective working knowledge, experience or expertise that is relevant to the company's industry/sector.	COMPLIANT	Our board members are highly qualified and competent to thoroughly examine issues and matters that affect Globe Telecom's business. Prior to election of directors at our Annual Stockholders' Meeting (ASM), our Nomination and Governance Committee, reviews the qualifications of each nominee to ensure that each member of our Board will be effective in his/her role as director and function as such in the best interest of the company and our stakeholders. In accordance with this and our board diversity policy, our Board is composed of directors with collective working knowledge, experience and/or expertise relevant to the telco industry. The profiles of our directors for the year 2018 are included in our Annual Report (SEC Form 17-A), Definitive Information Statement for 2018 (SEC Form 20-IS or DIS, which was the material used during our 17 April 2018 ASM) and reflected in our Integrated Report (IR). All of which are uploaded on our company website, which our stakeholders can easily access, view and/or download: IR for 2018 (pp. 85, 116-127) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf SEC Form 17-A for 2018 (pp. 100-106) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-	

		Disclosures/2018/Annual/annual-report-17a/GLO-17A-2018.pdf DIS (pp. 30-35) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf Our company website also has a dedicated section for corporate governance (CG)-related information (https://www.globe.com.ph/about-us/corporate-governance.html). This section includes, among others, the profiles of our current Board of Directors that are regularly updated: https://www.globe.com.ph/about-us/corporate-governance/board-of-directors.html Guidelines for the nomination, selection and election of directors are also reflected on our website: By-Laws (Article I, Section 5; Article II, Section 1.3), pp. 2-4 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/by-laws/By-Laws.pdf Company website – Policies on Board Nomination and Election, and Board Diversity https://www.globe.com.ph/about-us/corporate-governance/company-policies.html Charter of the Nomination and Governance Committee (Section 4 and 6), pp. 3-8 https://www.globe.com.ph/about-us/corporate-governance/board-of-directors/committees.html Manual of Corporate Governance (MCG) (Article II, Section 2.6, 2.8, 3.3, 5.2), pp. 11-15, 21-22, 27-28 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf	

2. Board has an appropriate mix of competence and expertise.	COMPLIANT	We have a very diverse mix of directors with professional backgrounds and experience in various industries other than the telco industry brought by a rigorous evaluation of qualifications of board nominees guided by, among others, our board diversity policy, board nomination and election policy, By-Laws and the Charter of our Nomination and Governance Committee. Our Board is composed of directors from various professional and academic backgrounds that include, among others, accounting and audit, sales and marketing, network operations, IT solutions, digital life, customer and services management, corporate governance and strategic planning, as well as educational backgrounds that include biochemistry, business administration, marketing, economics and finance, and metallurgical engineering, and mathematical sciences. The profile of our directors for the year 2018 are included in our Annual Report (SEC Form 17-A), Definitive Information Statement (DIS or SEC Form 17-A) and reflected in our Integrated Report (IR). Both of which are uploaded on our company website, which our stakeholders can easily access, view and/or download: SEC Form 17-A for 2018 (pp. 100-106) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2018/Annual/annual-report-17a/GLO-17A-2018.pdf DIS (pp. 30-35) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf IR for 2018 (pp. 116-127) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	

		Our company website also has a dedicated section for corporate governance (CG)-related information (https://www.globe.com.ph/about-us/corporate-governance.html). This section includes, among others, the profiles of our current Board of Directors that are regularly updated: https://www.globe.com.ph/about-us/corporate-governance/board-of-directors.html Guidelines for the nomination, selection and election of directors are also reflected on our website: By-Laws (Article I, Section 5; Article II, Section 1.3), pp. 2-4 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/by-laws/By-Laws.pdf Company website – Policies on Board Nomination and Election, and Board Diversity https://www.globe.com.ph/about-us/corporate-governance/company-policies.html Charter of the Nomination and Governance Committee (Section 4 and 6), pp. 3-8 https://www.globe.com.ph/about-us/corporate-governance/board-of-directors/committees.html Manual of Corporate Governance (MCG) (Article II, Section 2.6, 2.8, 3.3, 5.2), pp. 11-15, 21-22, 27-28 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf	
3. Directors remain qualified for their positions individually and collectively to enable them to fulfill their roles and responsibilities and respond to the needs of the organization.	COMPLIANT	In 2018, our directors attended various CG seminars and training programs conducted by SEC-accredited CG training providers. Topics and discussions during these seminars included the update on the new accounting standards that included, among others, the International Financial Reporting Standards (IFRS) 15 and its impact to Globe, SEC CG and regulatory updates, global and regional CG trends for the year, and enhancing audit committee effectiveness. These seminars and training programs also provide a venue for directors and key	

		officers to learn about other CG cases relevant to Globe's business. Attendance to the training programs and seminars are properly disclosed and posted on our website through the ACGR page and our IR: Annual Corporate Governance Report https://www.globe.com.ph/about-us/corporate-governance/annual-corporate-governance-report.html IR for 2018 (pp. 82-83, 86) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf The Board, together with our key officers, actively attend training programs annually to keep abreast of updates in CG standards and relevant discussions to support their leadership roles in Globe Telecom that cover issues and relevant market trends, new laws and regulations that can affect the business, sustainability and CG, among others. This is contained in the Charter of our Board of Directors and our MCG: Charter of the Board of Directors (Article II, Section 1.5), pp. 15-16 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Board-of-Directors-Charter.pdf Manual of Corporate Governance (MCG) (Article II, Section 1.2), pp. 3-4 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf	
Recommendation 1.2			
1. Board is composed of a majority of non-executive directors.	COMPLIANT	The Globe Telecom Board is composed of eleven board members who are elected by our shareholders during our ASM and hold office for the ensuing year until the next ASM. The President and CEO is elected as the sole executive director while the other members are non-executive directors (NEDs) who are not involved in the day-to-day management of business including our three	

		independent NEDs, one of whom is the lead independent director (ID). Results of the election of our directors during all ASMs are properly disclosed and posted on our website. Our 2018 ASM was held on 17 April 2018, while our most recent ASM was held on 23 April 2019: 2018 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/Results-of-2018-ASM-and-Organizational-Board-Meeting-SECReceived17Apr2018.pdf 2019 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2019/GLO-17C-ASM-2019-Results-and-Org-Meeting-Results-PSEReceived23Apr2019.pdf The profile of our directors for the year 2017 are included in our Annual Report (SEC Form 17-A) and reflected in our Integrated Report (IR). Both of which are uploaded on our company website, which our stakeholders can easily access, view and/or download: SEC Form 17-A for 2018, pp. 114-118 https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2018/Annual/annual-report-17a/GLO-17A-2018.pdf IR for 2018, pp. 103-113 https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf Our company website also has a dedicated section for corporate governance (CG)-related information (https://www.globe.com.ph/about-us/corporate-governance.html). This section includes, among others, the profiles of our current Board of Directors that are regularly updated: https://www.globe.com.ph/about-us/corporate-governance/board-of-directors.html	

Recommendation 1.3			
1. Company provides in its Board Charter and Manual on Corporate Governance a policy on training of directors.	COMPLIANT	Our policy on training of directors (and officers) is included in our MCG and Charter of the Board of Directors which are also on our website: Charter of the Board of Directors (Article I, Section 1.9(h); Section 2, (e); Article II, Section 1.5) https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Board-of-Directors-Charter.pdf MCG (Article II, Section 1.2, 2.3(h), 2.4(e), and 3.3(3)), pp. 3-14, 10-11, 21) https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Company website – Policy on Training of Directors and Officers https://www.globe.com.ph/about-us/corporate-governance/company-policies.html	
2. Company has an orientation program for first time directors.	COMPLIANT	In 2018, our directors attended various CG seminars and training programs conducted by SEC-accredited CG training providers. Likewise, Mr. Cirilo P. Noel was first elected to the Globe Board of Directors during our 17 April 2018 ASM. Mr. Noel attended a CG orientation program on 6 June 2018. In accordance with applicable SEC rules and regulations, first-time directors shall attend at least an eight-hour orientation program. This is expressly stated in our MCG and Charter of the Board of Directors: Advisement Letter on Attendance of a Director to CG Orientation Program https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2018/Other-Reports/Other-Disclosures/GLO-Advisement-Letter-on-Director-Participation-to-CGOP-SECReceived08June2018.pdf Charter of the Board of Directors (Article I, Section 1.9(h)), page 11	

		https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Board-of-Directors-Charter.pdf MCG (Article II, Section 2.3(h)), pp. 10-11 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf All our incumbent directors have had prior experience serving as such in other corporations prior to their directorship in Globe Telecom.	
3. Company has relevant annual continuing training for all directors.	COMPLIANT	Globe Telecom participates in the annual Ayala-wide CG and Risk Management Summit. This serves as compliance to the requirement on directors' and key officers' annual attendance to CG training programs. The Summit program is submitted to the SEC for review and approval before the event is finalized. Other training programs are made available to directors as needed and relevant to their roles and responsibilities. As part of our company policy, funds may be allocated for this purpose as necessary: Charter of the Board of Directors (Article I, Section 1.9(h)), page 11 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Board-of-Directors-Charter.pdf MCG (Article II, Section 2.3(h)), pp. 10-11 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf In 2018, our directors attended various CG seminars and training programs conducted by SEC-accredited CG training providers. Topics and discussions during these seminars included the update on the new accounting standards that included, among others, the International Financial Reporting Standards (IFRS) 15 and its impact to Globe, SEC CG and regulatory updates, global and regional CG trends for the year, and enhancing audit committee effectiveness. These seminars and training programs also provide a venue for directors and key	

		officers to learn about other CG cases relevant to Globe's business. Attendance to the training programs and seminars are properly disclosed and posted on our website through the ACGR page and our IR: Annual Corporate Governance Report https://www.globe.com.ph/about-us/corporate-governance/annual-corporate-governance-report.html IR for 2018 (pp. 90-91) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
Recommendation 1.4			
1. Board has a policy on board diversity.	COMPLIANT	As part of our CG best practices and in implementation of our board diversity policy in the workplace, we have at least one female independent director in the Board – Ms. Saw Phaik Hwa. Furthermore, as stated in our Board diversity policy, no director or candidate for director shall be discriminated upon by reason of gender, age, disability, ethnicity, nationality or political, religious, or cultural backgrounds. Company Policies – Policy on Board Diversity https://www.globe.com.ph/about-us/corporate-governance/company-policies.html Charter of the Board of Directors (Article II, Section 1.2), page 15 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Board-of-Directors-Charter.pdf MCG (Article II, Section 1.3), page 4 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Our Board is composed of directors with a wide age range. None of our independent directors serve in more than five boards of publicly-listed companies and have served the company in the same capacity for more than nine years.	

		Our executive director does not serve in any other publicly-listed company's Board. Our board members have different expertise, corporate qualifications and academic backgrounds. Our board members also come from different ethnic backgrounds and are a mix of different nationalities and age range. IR for 2018 (pp. 85, 116-127) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf Current Members of the Board of Directors on company website https://www.globe.com.ph/about-us/corporate-governance/board-of-directors.html	
Optional: Recommendation 1.4			
1. Company has a policy on and discloses measurable objectives for implementing its board diversity and reports on progress in achieving its objectives.	COMPLIANT	In addition to the qualifications, disqualifications, and other criteria set forth in our corporate documents and relevant law in relation to the nomination and election of members of the Board, we are committed to promote and observe diverse membership among our directors. Our board diversity objectives are to encourage and have: a) at least three (3) independent directors, one (1) of whom shall be female, at all times, b) at least one (1) member director with global expertise in digital technology, c) at least one non-Filipino member director, and, d) a young and very experienced member director to offer fresh ideas and add diversity in opinion to the Board. Directors must also have understanding of the telecommunications industry or sufficient professional experience and competence in other relevant industries, which further encourages a diversified collaboration of views and skillset within our Board. Company Policies – Board Diversity Policy https://www.globe.com.ph/about-us/corporate-governance/company-policies.html Charter of the Board of Directors (Article II, Section 1.2), page 15	

		https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Board-of-Directors-Charter.pdf MCG (Article II, Section 1.3), page 4 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf In implementation of our board diversity policy, we have one (1) female non-executive, independent director in the Board who is also a Singaporean – Ms. Saw Phaik Hwa. We also have Mr. Samba Natarajan who is one of our non-executive directors; Mr. Natarajan is an American and has global expertise in digital technology, among his other notable professional experience. We also have Mr. Lang Tao Yih, Arthur who is our non-executive director and Co-Vice Chairman; Mr. Lang is Singaporean and our youngest board member, under 50 years old, who also shares his very fruitful global professional experience to our Board. IR for 2018 (pp. 85, 116-127) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf Current Members of the Board of Directors on company website https://www.globe.com.ph/about-us/corporate-governance/board-of-directors.html	
Recommendation 1.5			
1. Board is assisted by a Corporate Secretary.	COMPLIANT	Our Corporate Secretary is Atty. Solomon M. Hermosura. Atty. Hermosura was re-appointed as our Corporate Secretary during the Organizational Meeting of the Board held after the 2018 and 2019 ASMs. This information was properly disclosed. The same is reflected in our IR and company website. Our annual Information Statement (DIS) also shows Atty. Hermosura's profile. 2018 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-	

		stockholders-meeting/2018/Results-of-2018-ASM-and-Organizational-Board-Meeting-SECReceived17Apr2018.pdf 2019 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2019/GLO-17C-ASM-2019-Results-and-Org-Meeting-Results-PSEReceived23Apr2019.pdf IR for 2018, page 91 https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf DIS, pp. 45 https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf Company website – Key Officers https://www.globe.com.ph/about-us/corporate-governance/key-officers.html As mentioned in our Charter of the Board of Directors, the Board has access to the Corporate Secretary who, among others, acts as adviser to directors regarding their responsibilities and obligations, and oversees the flow of information prior to meetings. Charter of the Board of Directors (Article III, Section 1.1), pp. 19-20 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Board-of-Directors-Charter.pdf MCG (Article II, Section 1.4), pp. 4-5 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf	
2. Corporate Secretary is a separate individual from the Compliance Officer.	COMPLIANT	Our Corporate Secretary is Atty. Solomon M. Hermosura, while our Chief Compliance Officer is Atty. Marisalve	

		Ciocson-Co. Atty. Hermosura and Atty. Ciocson-Co were re-appointed as such during the Organizational Meeting of the Board held after the 2018 and 2019 ASMs. This information was properly disclosed. The same is reflected in our IR, our DIS and company website: 2018 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/Results-of-2018-ASM-and-Organizational-Board-Meeting-SECReceived17Apr2018.pdf 2019 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2019/GLO-17C-ASM-2019-Results-and-Org-Meeting-Results-PSEReceived23Apr2019.pdf IR for 2018, page 91 https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf DIS, pp. 45 https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf Company website – Key Officers https://www.globe.com.ph/about-us/corporate-governance/key-officers.html	
3. Corporate Secretary is not a member of the Board of Directors.	COMPLIANT	Atty. Solomon M. Hermosura, our Corporate Secretary, is not a member of the Board of Directors. This information was properly disclosed. The same is reflected in our IR, our annual Information Statement and company website: 2018 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/Results-of-2018-ASM-and-Organizational-Board-Meeting-SECReceived17Apr2018.pdf	

		2019 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2019/GLO-17C-ASM-2019-Results-and-Org-Meeting-Results-PSEReceived23Apr2019.pdf IR for 2018, page 91 https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf DIS, pp. 43, 45 https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf Company website – Key Officers https://www.globe.com.ph/about-us/corporate-governance/key-officers.html	
4. Corporate Secretary attends training/s on corporate governance.	COMPLIANT	Atty. Hermosura, our Corporate Secretary, attended the annual Ayala-wide CG and Risk Management Summit on September 10, 2018. Attendance to the Summit was properly disclosed: Annual Corporate Governance Report https://www.globe.com.ph/about-us/corporate-governance/annual-corporate-governance-report.html Attendance to the CG and Risk Management Summit https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-corporate-governance-report/2018/GLO-2018-CGRM-Summit-Certificate-Key-Officers.pdf The Summit program is submitted to the SEC for review and approval before the event is finalized. Topics and discussions during the Summit included advanced CG training on the role of CG policies and practices in accelerating business growth, adapting to evolving ways of doing business, and the role of the board in ensuring good CG, among others. The same is identified in our IR:	

		IR for 2018, page 91 https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
Optional: Recommendation 1.5			
1. Corporate Secretary distributes materials for board meetings at least five business days before scheduled meeting.	COMPLIANT	Under Globe Telecom policy on meetings of the Board, Board materials/papers shall be provided to each director at least seven (7) days prior to the meeting. This way, the Corporate Secretary ensures that materials for our Board meetings are distributed to and received by each member of the Board within five business days before scheduled Board meetings. Charter of the Board of Directors (Article I, Section 1.3 (1.13.1)), page 13 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Board-of-Directors-Charter.pdf MCG (Article II, Section 4.1), pp. 25-26 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf	
Recommendation 1.6			
1. Board is assisted by a Compliance Officer.	COMPLIANT	Our Chief Compliance Officer is Atty. Marisalve Ciocson-Co. As indicated in the Charter of the Board, part of the responsibilities of our Chief Compliance Officer is to assist our Board in relation to compliance and governance matters. Atty. Ciocson-Co was re-appointed as our Chief Compliance Officer during the Organizational Meeting of the Board held after the 2018 and 2019 ASMs. This information was properly disclosed. The same is reflected in our IR, our DIS and company website: 2018 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/Results-of-2018-ASM-and-Organizational-Board-Meeting-SECReceived17Apr2018.pdf 2019 Results of the ASM and Board Organizational Meeting	

		https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2019/GLO-17C-ASM-2019-Results-and-Org-Meeting-Results-PSEReceived23Apr2019.pdf Charter of the Board of Directors (Article II, Section 1.1 and 1.5; Article III, Section 1.1), pp. 14-15, 19-20 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Board-of-Directors-Charter.pdf IR for 2018, page 91 https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf DIS, pp. 43, 45 https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf Company website – Key Officers https://www.globe.com.ph/about-us/corporate-governance/key-officers.html	
2. Compliance Officer has a rank of Senior Vice President or an equivalent position with adequate stature and authority in the corporation.	COMPLIANT	Atty. Marisalve Ciocson-Co is Senior Vice President and Chief Compliance Officer. Her appointment was properly disclosed through an advisement letter dated 4 April 2017: Change in Designation of Key Officer https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Other-Reports/Other-Disclosures/GLO-Form-17C-Change-in-Appointment-of-Key-Officer.pdf As mentioned in our Charter of the Board of Directors, the Board shall also be assisted by a Compliance Officer who should have a rank of Senior Vice President or an equivalent position with adequate stature and authority in Globe Telecom. MCG (Article II, Section 1.5), page 5	

		https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Charter of the Board of Directors (Article III, Section 1.1), pp. 19-20 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Board-of-Directors-Charter.pdf	
3. Compliance Officer is not a member of the board.	COMPLIANT	Atty. Marisalve Ciocson-Co, our Chief Compliance Officer, is not a member of the Board of Directors. This information was properly disclosed. The same is reflected in our IR, our DIS and company website: 2018 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/Results-of-2018-ASM-and-Organizational-Board-Meeting-SECReceived17Apr2018.pdf 2019 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2019/GLO-17C-ASM-2019-Results-and-Org-Meeting-Results-PSEReceived23Apr2019.pdf IR for 2018, page 82 https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf DIS, p. 43, 45 https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf Company website – Key Officers https://www.globe.com.ph/about-us/corporate-governance/key-officers.html	

4. Compliance Officer attends training/s on corporate governance.	COMPLIANT	Atty. Ciocson-Co, attended the annual Ayala-wide CG and Risk Management Summit on September 10 together with other directors and key officers. Attendance to the Summit was properly disclosed: Attendance to the CG and Risk Management Summit https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-corporate-governance-report/2018/GLO-2018-CGRM-Summit-Certificate-Key-Officers.pdf The Summit program is submitted to the SEC for review and approval before the event is finalized. Topics and discussions during the Summit included the SEC i-ACGR and new Code of CG, global and regional CG trends for the year, cybercrime, cyber rights and data privacy, among others. The same is identified in our IR: IR for 2018 (page 91) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
Principle 2: The fiduciary roles, responsibilities and accountabilities of the Board as provided under the law, the company's articles and by-laws, and other legal pronouncements and guidelines should be clearly made known to all directors as well as to stockholders and other stakeholders.			
Recommendation 2.1			
1. Directors act on a fully informed basis, in good faith, with due diligence and care, and in the best interest of the company.	COMPLIANT	Directors actively attend regular board and committee meetings. Directors are provided with board materials seven (7) days before the date of the meeting. For ASMs, our directors, together with our shareholders, also receive a copy of the Notice and Agenda as well as relevant materials ahead of the meeting. Materials for our ASM on April 17, 2018 were first sent on March 12, 2018 to shareholders. Our Board held seven (7) Board meetings in 2018. In addition, the Executive Committee held 6 meetings, Audit and Related Party Transactions (RPT) Committee held 4 meetings, the Compensation and Remuneration Committee held 2 meetings, the Nomination and Governance Committee also held 2 meetings and the	

		Finance Committee held 5 meetings during the year. Attendance of each director in board and committee meetings held in 2018 are enumerated in our IR and posted on our website. The meetings held and attendance of our directors thereto show active participation among directors in our Board. The average rate of attendance of our directors to Board meetings was ninety-eight percent (98%) in 2018, which is more than compliant with the SEC's minimum attendance requirement of 50%. Meanwhile, the average attendance rate of our IDs was one hundred percent (100%) including our lead ID. IR for 2018 (page 89) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf Company website – Board Meetings https://www.globe.com.ph/about-us/corporate-governance/board-of-directors/meetings.html Company website – Board Committee Attendance https://www.globe.com.ph/about-us/corporate-governance/board-of-directors/committees.html Charter of the Board of Directors (Article I, Section 1.13.1), page 13 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Board-of-Directors-Charter.pdf MCG (Article II, Section 4.1), pp. 25-26 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf DIS, page 12 https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-	

		Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf	
Recommendation 2.2			
1. Board oversees the development, review and approval of the company's business objectives and strategy.	COMPLIANT	Our Board of Directors is our highest governance body. It establishes our company's vision, mission, and strategic direction, as well as monitors the implementation of the corporate strategy and the overall corporate performance of the company to ensure transparency, accountability, integrity and fairness, and to protect the long-term interests of our stakeholders. Through its various committees, the Board also oversees and conducts a review of our overall risk management (RM) systems, and our material controls, covering operational, financial and compliance areas, and overall RM-related systems. Finally, they approve corporate operation and capital budgets, major acquisition and disposal of assets, major investments, and changes in authority and approval limits. An annual review of our mission, vision, and values, together with our business strategies, is conducted to stay relevant to the growing needs of our stakeholders. The Board performed this exercise again in 2018. As attested to by our Corporate Secretary, the Board is able to fulfill its responsibilities in overseeing the development, review and approval of Globe Telecom's business objectives, strategies and implementation of the same through Board discussions that take place in Board meetings before the Board gives approval for quarterly financial results and annual consolidated audited financial statements. Our Statement of Management's Responsibility for Consolidated Financial Statements (SMR) also states, among others, that our Board is responsible for overseeing financial reporting process, review and approval for financial statements. Our SMR and Audit and RPT Committee report are also included in our IR. IR for 2018 (pp. 138-139, 143) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
2. Board oversees and monitors the implementation of the company's business objectives and strategy.	COMPLIANT		

		Attendance of Board to Board Meetings in 2018 https://www.globe.com.ph/about-us/corporate-governance/board-of-directors/meetings.html Attendance of Directors to Committee Meetings in 2018 https://www.globe.com.ph/about-us/corporate-governance/board-of-directors/committees.html As part of our shareholders' rights, any shareholder can have access to minutes of the Board meetings and other resolutions upon request.	
Supplement to Recommendation 2.2			
1. Board has a clearly defined and updated vision, mission and core values.	COMPLIANT	Our mission, vision, and values are posted on our company website and also included in our annual IR. IR (page 3) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf Company website – Vision, Mission and Values https://www.globe.com.ph/about-us/corporate-governance/corporate-objectives.html According to our MCG and Charter of the Board, our vision, mission, values and strategic objectives are subject to review by our Board at least once every five years, if not sooner as the Board deems necessary. Our Board updated our vision, mission and values in 2016 and further reviewed these in 2018 alongside our business strategies to stay relevant to the growing needs of our stakeholders. MCG (Article II, Section 2.1(b)), page 6 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Charter of the Board of Directors (Article I, Section 1.8.1(ii)), page 7 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-	

		corporate-governance/GLO-MCG-SECReceived30May2017.pdf	
2. Board has a strategy execution process that facilitates effective management performance and is attuned to the company's business environment, and culture.	COMPLIANT	Our key business strategies are identified and discussed in our IR. IR (pp. 3, 6-7, 10-11) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
Recommendation 2.3			
1. Board is headed by a competent and qualified Chairperson.	COMPLIANT	As defined in our MCG and Charter of the Board, our Board shall be headed by a competent and qualified Chairman. Mr. Jaime Augusto Zobel de Ayala is Globe Telecom's Chairman of the Board. The profile of Mr. Zobel is on our company website, IR and DIS. Company website – Members of the Board https://www.globe.com.ph/about-us/corporate-governance/board-of-directors.html IR (page 117) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf DIS (page 30) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf MCG (Article II, Section 2.4), page 11 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Charter of the Board of Directors (Article I, Section 1.10), page 12 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf	

Recommendation 2.4			
1. Board ensures and adopts an effective succession planning program for directors, key officers and management.	COMPLIANT	Our policy on succession planning is posted on our website and included in our MCG and Charter of the Board. Company website https://www.globe.com.ph/about-us/corporate-governance/company-policies.html IR (pp. 72-74) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf MCG (Article II, Section 2.11), page 16 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Charter of the Board of Directors (Article I, Section 1.4), pp. 4-5 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf	
2. Board adopts a policy on the retirement for directors and key officers.	COMPLIANT	Our policy on retirement for directors and key officers is embedded in our policy on succession planning. It is also posted on our website and included in our MCG and Charter of the Board. Company website https://www.globe.com.ph/about-us/corporate-governance/company-policies.html MCG (Article II, Section 2.11), page 16 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Charter of the Board of Directors (Article I, Section 1.4), pp. 4-5	

		https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf	
Recommendation 2.5			
1. Board aligns the remuneration of key officers and board members with long-term interests of the company.	COMPLIANT	This is included in our MCG and Charter of the Board. Our policy on remuneration of the Board as well as policy on employee rewards or compensation are also posted on our website. The same are discussed in our IR and Charter of the Compensation and Remuneration Committee. Company website – Employee Rewards or Compensation Policy, and Policy on Remuneration of Board https://www.globe.com.ph/about-us/corporate-governance/company-policies.html MCG (Article II, Section 2.2(c, g); Section 3.3; Section 3.4.3; Article III, Section 8.4; Article VII, Section 15.5), pp. 7-8, 23, 32-33, 51-52 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Charter of the Board of Directors (Article I, Section 1.8.2(c, g); Article III, Section 1.2), pp. 8-9, 20 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf IR (pp. 72-75, 93-94) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf Charter of the Compensation and Remuneration Committee (page 1) https://www.globe.com.ph/about-us/corporate-governance.htmlcontent/dam/multi-microsites/docs/2018/Com-and-Rem-Committee-Charter-Apr2016.pdf	
2. Board adopts a policy specifying the relationship between remuneration and performance.	COMPLIANT		

3. Directors do not participate in discussions or deliberations involving his/her own remuneration.	COMPLIANT	As part of our Charter of the Compensation and Remuneration Committee, MCG and Charter of the Board, no director participates in the discussions or deliberations involving his/her own remuneration. Globe Telecom's directors receive per diem remuneration for every Board meeting, stockholders' meeting, and committee meeting attended or such meetings other than those mentioned above. Our stockholders vote on remuneration matters of our Board at our ASMs as applicable. Our directors, including the independent NEDs, do not receive options, performance shares or bonuses other than their per diem remuneration as directors. Meanwhile, our executive director does not receive per diem remuneration in addition to his remuneration as part of the Globe senior management in his role as the President and CEO. Charter of the Compensation and Remuneration Committee (page 1) https://www.globe.com.ph/about-us/corporate-governance.htmlcontent/dam/multi-microsites/docs/2018/Com-and-Rem-Committee-Charter-Apr2016.pdf MCG (Article II, Section 2.2(c)), pp. 7-8 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Charter of the Board of Directors (Article I, Section 1.8.2(c)), pp. 8-9 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Company website – Policy on Remuneration of Board https://www.globe.com.ph/about-us/corporate-governance/company-policies.html IR (page 90)	

		https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
Optional: Recommendation 2.5			
1. Board approves the remuneration of senior executives.	COMPLIANT	Our Board evaluates and approves the remuneration components of our senior executives aligned with our remuneration policy such as incentive programs that include, among others, our employee stock grant plan, corporate incentive plan and the long-term incentive plan. With recommendation from our Compensation and Remuneration Committee, the Board also conducts an annual review of the incentive plans, or more frequently as needed. MCG (Article II, Section 3.3 (d)), page 21 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Charter of the Compensation and Remuneration Committee (page 1) https://www.globe.com.ph/about-us/corporate-governance.htmlcontent/dam/multi-microsites/docs/2018/Com-and-Rem-Committee-Charter-Apr2016.pdf IR (page 93) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
2. Company has measurable standards to align the performance-based remuneration of the executive directors and senior executives with long-term interest, such as claw back provision and deferred bonuses.	COMPLIANT	The remuneration of our executive director and senior executives is composed of four main components – fixed remuneration, benefits, short term incentives (performance bonus) and long term incentives. The structure is designed such that the variable component increases as the employee moves up our corporate ladder. Current remuneration initiatives allow for certain incentives to be withheld or deferred in any year should an executive fail to meet performance requirements or be involved in any misconduct and are given a disciplinary action resulting to suspension or demotion. These are discussed in our IR and in	

		Note 26 of our Consolidated Audited Financial Statements (AFS). IR (pp. 93-94) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf AFS for 2018 (pp. 35, 90-97) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2018/Annual/audited-financial-statements/GLO-Conso-FS-2018-SECReceived28Feb2019-final.pdf	
Recommendation 2.6			
1. Board has a formal and transparent board nomination and election policy.	COMPLIANT	Our Board nomination and election policy is disclosed in our MCG, website and our Charter of the Board. The nomination of the 2018 directors was initiated by a minority shareholder as indicated in our DIS. MCG (Article II, Section 2.6), pp. 11-13 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Board Nomination and Election Policy https://www.globe.com.ph/about-us/corporate-governance/company-policies.html DIS (pp. 9, 13) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf Charter of the Board of Directors (Article I, Section 1.6), pp. 5-7 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf	
2. Board nomination and election policy is disclosed in the company's Manual on Corporate Governance.	COMPLIANT		

3. Board nomination and election policy includes how the company accepted nominations from minority shareholders.	COMPLIANT	Our Board nomination and election policy includes how we accept nominations from all shareholders, including minority shareholders and how list of candidates are shortlisted or how the shortlist of candidates is developed after deliberation of candidates. The nomination of the shareholder of the directors is also acknowledged in our annual DIS. By-Laws (Article I, Section 5; Article II, Section 1 and 1.3), pp. 2, 3-4 https://www.globe.com.ph/about-us/corporate-governance.htmlcontent/dam/multi-microsites/docs/2011/GLOBE%20-%20Amended%20By-Laws%202011.pdf MCG (Article II, Section 2.6), pp. 11-13 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Board Nomination and Election Policy https://www.globe.com.ph/about-us/corporate-governance/company-policies.html Charter of the Nomination and Governance Committee, pp. 3-5 https://www.globe.com.ph/about-us/corporate-governance.htmlcontent/dam/multi-microsites/docs/2018/Globe-Nomination-and-Governance-Committee-Charter.pdf Charter of the Board of Directors (Article I, Section 1.6), pp. 5-7 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf DIS (pp. 9, 13) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-	
4. Board nomination and election policy includes how the board shortlists candidates.	COMPLIANT		

		Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf	
5. Board nomination and election policy includes an assessment of the effectiveness of the Board's processes in the nomination, election or replacement of a director.	COMPLIANT	Our Board nomination and election policy ensures that the process in relation to the nomination and election of our directors is convenient for our shareholders and includes a process for identifying the quality of directors aligned with the strategic direction of the company. Our MCG and Charter of the Board also identify the qualifications and disqualifications considered in evaluating board members. Further, our Corporate Secretary and Chief Compliance Officer ensure that the processes in nomination, election or replacement of a director remain effective and aligned with our By-Laws and CG practices. By-Laws (Article I, Section 5; Article II, Section 1 and 1.3), pp. 2, 3-4 https://www.globe.com.ph/about-us/corporate-governance.htmlcontent/dam/multi-microsites/docs/2011/GLOBE%20-%20Amended%20By-Laws%202011.pdf MCG (Article II, Section 2.6, 2.8-2.10), pp. 11-16 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Board Nomination and Election Policy https://www.globe.com.ph/about-us/corporate-governance/company-policies.html Charter of the Nomination and Governance Committee, pp. 3-8 https://www.globe.com.ph/about-us/corporate-governance.htmlcontent/dam/multi-microsites/docs/2018/Globe-Nomination-and-Governance-Committee-Charter.pdf Charter of the Board of Directors (Article I, Section 1.2-1.6), pp. 2-7 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-	
6. Board has a process for identifying the quality of directors that is aligned with the strategic direction of the company.	COMPLIANT		

		corporate-governance/GLO-MCG-SECReceived30May2017.pdf DIS (pp. 9, 13) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf	
Optional: Recommendation to 2.6			
1. Company uses professional search firms or other external sources of candidates (such as director databases set up by director or shareholder bodies) when searching for candidates to the board of directors.	COMPLIANT	Our Board nomination and election policy states that we may use professional search firms or external sources when searching for candidates to the Board. Charter of the Nomination and Governance Committee (Section 4.3), page 5 https://www.globe.com.ph/about-us/corporate-governance.htmlcontent/dam/multi-microsites/docs/2018/Globe-Nomination-and-Governance-Committee-Charter.pdf Charter of the Board of Directors (Article I, Section 1.6), pp. 5-7 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf	
Recommendation 2.7			
1. Board has overall responsibility in ensuring that there is a group-wide policy and system governing related party transactions (RPTs) and other unusual or infrequently occurring transactions.	COMPLIANT	Our policy on RPTs includes, among others, definition of RPTs, coverage and materiality threshold, guidelines to ensure arm's length terms, identification and prevention or management of potential or actual conflicts of interest, the role of and review by the Audit and RPT Committee in relation to RPTs, whistle-blowing mechanism, restitution of losses and other remedies for abusive RPTs, and proper disclosure of RPTs. Policy on RPTs https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/related-party-transactions/Policy-on-RPTs/Policy-on-RPTs.pdf Our RPTs for 2017 and 2018 are disclosed and discussed in	
2. RPT policy includes appropriate review and approval of material RPTs, which guarantee fairness and transparency of the transactions.	COMPLIANT		
3. RPT policy encompasses all entities within the group, taking into account their size, structure, risk profile and complexity of operations.	COMPLIANT		

		Note 16 and Note8 of our Notes to the Consolidated Financial Statements, respectively, as reflected in our AFS, DIS and SEC Form 17-A. AFS for 2017 (pp. 73-79 of the Notes to the Consolidated Financial Statements) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/audited-financial-statements/GLO-Audited-FS-2017.pdf AFS for 2018 (pp. 76-82 of the Notes to the Consolidated Financial Statements) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2018/Annual/audited-financial-statements/GLO-Conso-FS-2018-SECReceived28Feb2019-final.pdf DIS (pp. 73-79 of the Notes to the Consolidated Financial Statements) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf DIS (pp. 76-82 of the Notes to the Consolidated Financial Statements) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2018/Annual/audited-financial-statements/GLO-Conso-FS-2018-SECReceived28Feb2019-final.pdf SEC Form 17-A (pp. 76-82 of the Notes to the Consolidated Financial Statements, or 204-210 of the PDF file) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2018/Annual/annual-report-17a/GLO-17A-2018.pdf	
Supplement to Recommendations 2.7			

1. Board clearly defines the threshold for disclosure and approval of RPTs and categorizes such transactions according to those that are considered *de minimis* or transactions that need not be reported or announced, those that need to be disclosed, and those that need prior shareholder approval. The aggregate amount of RPTs within any twelve (12) month period should be considered for purposes of applying the thresholds for disclosure and approval.	COMPLIANT	Our policy on RPTs identifies its coverage and materiality thresholds as well as transactions that are excluded from the policy and therefore shall not be subject to the review of our Audit and RPT Committee. Policy on RPTs (Section II), pp. 2-3 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/related-party-transactions/Policy-on-RPTs/Policy-on-RPTs.pdf	
2. Board establishes a voting system whereby a majority of non-related party shareholders approve specific types of related party transactions during shareholders' meetings.	COMPLIANT	Should the transactions require shareholders' approval during an ASM, Globe Telecom will provide its shareholders with complete information of the RPTs as stated in our policy on RPTs. Our voting procedures are included in our By-Laws, MCG and in our DIS. Company website – Policy on RPTs (Section VII) https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/related-party-transactions/Policy-on-RPTs/Policy-on-RPTs.pdf By-Laws (Article I, Section 5), page 2 https://www.globe.com.ph/about-us/corporate-governance.htmlcontent/dam/multi-microsites/docs/2011/GLOBE%20-%20Amended%20By-Laws%202011.pdf MCG (Article II, Section 2.6.2), pp. 12-13 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf DIS (page 9) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf	
Recommendation 2.8			

1. Board is primarily responsible for approving the selection of Management led by the Chief Executive Officer (CEO) and the heads of the other control functions (Chief Risk Officer, Chief Compliance Officer and Chief Audit Executive).	COMPLIANT	At the organizational meeting of the Board held immediately after each ASM, the Board approves the key officers for appointment for the year. These officers in Management include our Chief Risk Officer (CRO), Chief Compliance Officer and Chief Audit Executive (CAE). This is also stated as part of the general responsibilities of our Board in our MCG and Charter of the Board. Our key officers appointed for 2018 were: • Ernest L. Cu – President and CEO • Alberto M. de Larrazabal – Chief Commercial Officer (CCO) • Gil B. Genio – Chief Technology and Information Officer (CTIO), and Chief Strategy Officer (CSO) • Rosemarie Maniego-Eala – Chief Finance Officer (CFO), Treasurer and Chief Risk Officer (CRO) • Renato M. Jiao – Chief Human Resource Officer (CHRO) • Rebecca V. Eclipse – Chief Customer Experience Officer (CCEO) • Vicente Froilan M. Castelo – General Counsel • Maria Aurora Sy-Manalang – Chief Information Officer (CIO) • Carmina J. Herbosa – Chief Audit Executive (CAE) • Bernard P. Llamzon – Executive Vice President – Channel Management • Solomon M. Hermosura – Corporate Secretary • Marisalve Ciocson-Co – Senior Vice President – Law and Compliance, Chief Compliance Officer and Assistant Corporate Secretary Results of the Organizational Meeting on 17 April 2018 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/Results-of-2018-ASM-and-Organizational-Board-Meeting-SECReceived17Apr2018.pdf MCG (Article II, Section 2.1(e)), page 6 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf	

		Charter of the Board of Directors (Article I, Section 1.8.1(v)), page 7 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Board-of-Directors-Charter.pdf	
2. Board is primarily responsible for assessing the performance of Management led by the Chief Executive Officer (CEO) and the heads of the other control functions (Chief Risk Officer, Chief Compliance Officer and Chief Audit Executive).	COMPLIANT	Our MCG and Charter of the Board state that the selection of and assessment of the performance of Management is one of the general responsibilities of the Board. MCG (Article II, Section 2.1(e)), page 6 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Charter of the Board of Directors (Article I, Section 1.8, (v)), page 7 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf The Board's assessment of Management performance, including the CEO, CRO, CAE and Chief Compliance Officer, is covered by the Board's annual self-assessment. Board Self-Assessment Questionnaire https://www.globe.com.ph/about-us/corporate-governance.htmlcontent/dam/multi-microsites/docs/2017/GLOBE-Board-Self-Assessment-Form.pdf	
Recommendation 2.9			
1. Board establishes an effective performance management framework that ensures that Management's performance is at par with the standards set by the Board and Senior Management.	COMPLIANT	The Board's assessment of Management performance is covered by the Board's annual self-assessment. The Board, as it deems necessary, may re-evaluate performance of Management more frequently within a year in accordance with targets and performance indicators set forth at the beginning of the year. Among others, these would also include business objectives mentioned in our IR. Board Self-Assessment Questionnaire https://www.globe.com.ph/about-us/corporate-governance.htmlcontent/dam/multi-	
2. Board establishes an effective performance management framework that ensures that personnel's performance	COMPLIANT		

is at par with the standards set by the Board and Senior Management.		microsites/docs/2017/GLOBE-Board-Self-Assessment-Form.pdf MCG (Article II, Section 1.1; Section 2.1(b, e-f); Section 6), pp. 3, 6, 30 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Charter of the Board of Directors (Article I, Section 1.8.1, (vi); Article I, Section 1.14), pp. 3, 14 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Company website – Employee Rewards or Compensation Policy, and Policy on Remuneration of Board https://www.globe.com.ph/about-us/corporate-governance/company-policies.html IR for 2018 (pp. 6-7, 72-74, 76, 90) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
Recommendation 2.10			
1. Board oversees that an appropriate internal control system is in place.	COMPLIANT	Our MCG and Charter of the Board state that one of the Board's general responsibilities is to ensure the presence and adequacy of internal control mechanisms and systems for good governance within the company. The Board also created its Audit and RPT Committee to assist in its function in ensuring the company's internal control system is effectively working and in place. The annual report by our Audit and RPT Committee also shows that the Board oversees the company's internal control system MCG (Article II, Section 2.1(g); Section 2.2 (e), (m); Section 3.2; Section 7.2; Article V), pp. 6-7, 8, 17-21, 36-42 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf	

		Charter of the Board of Directors (Article I, Section 1.8.1; Article II, Section 1.1), pp. 7-8, 14 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf IR (pp. 138-139) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
2. The internal control system includes a mechanism for monitoring and managing potential conflict of interest of the Management, members and shareholders.	COMPLIANT	Our MCG and Charter of the Board of Directors lay out CG principles to ensure objective and independent decision-making by the Board to avoid conflict of interest situations. Our policy on conflict of interest under our Code of Conduct and Ethics (CoC) covers Board and Management as well. MCG (Article II, Section 3.5), pp. 24-25 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Charter of the Board of Directors (Article II, Section 1.6), pp. 5-7 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Code of Conduct and Ethics, pp. 10, 31-32, 50-51, 77-81 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/company-policies/Code-of-Conduct.pdf	
3. Board approves the Internal Audit Charter.	COMPLIANT	Our Internal Audit Charter is posted on our company website: Internal Audit Charter https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Internal-Audit-Charter.pdf	

Recommendation 2.11			
1. Board oversees that the company has in place a sound enterprise risk management (ERM) framework to effectively identify, monitor, assess and manage key business risks.	COMPLIANT	The Board of Directors oversees and conducts an annual review of our material controls, covering operational, financial and compliance areas and overall RM systems. The overall responsibility for our RM oversight rests with the Board. To enable the Board to effectively discharge our RM function, various Board Committees have been designated to provide RM oversight for specific risk areas. With guidance provided by the Board, our Management is fully responsible for decision-making over the day-to-day affairs of Globe including the design, development and implementation of the RM strategies, policies and systems intended to address the identified risks. A Management-Level Risk Management Committee (MLRMC), chaired by the Chief Risk Officer (CRO), was established to assist the Board in fulfilling its oversight responsibilities in relation to risk governance in Globe Telecom. An enterprise wide assessment of risks is performed by the Management and Business Team as part of our annual planning and budgeting process, results of which are reported to and reviewed by the Board. Discussion on our RM framework and process as well as the oversight of the Board over RM and interaction with Management in relation thereto are in our IR. The review and assessment of our RM strategies and findings are also included in the report of our Audit and RPT Committee to the Board. At the organizational meeting of the Board after our most recent ASM on 23 April 2019, the Board Risk Oversight Committee (BROC) was created together with other Board Committees. Among other responsibilities, the BROC assists the Board with its oversight of the ERM system to ensure its functionality and effectiveness. Our MCG and Charter of the Board of Directors state the Board responsibilities in relation to oversight over the company's ERM and to ensure that an ERM framework is working effectively. The Board also created the Audit and RPT Committee to assist it further in its oversight over matters related to ERM. IR for 2018 (pp. 106-108, 138-139)	
2. The risk management framework guides the board in identifying units/business lines and enterprise-level risk exposures, as well as the effectiveness of risk management strategies.	COMPLIANT		

		https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf MCG (Article II, Section 2.2, Section 3.2; Article V), pp. 7-10, 17-20, 36-42 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Charter of the Board of Directors (Article II, Section 1.12; Article III, Section 1.1), pp. 12-13, 19-20 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Charter of the Audit and RPT Committee https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Audit-and-RPTs-Committee-Charter.pdf	
Recommendation 2.12			
1. Board has a Board Charter that formalizes and clearly states its roles, responsibilities and accountabilities in carrying out its fiduciary role.	COMPLIANT	Globe Telecom's Charter of the Board of Directors is posted on our company website. The Board Charter, among others, formalizes and clearly states the Board's roles, responsibilities and accountabilities in carrying out its fiduciary duties and serve as a guide to the directors in the performance of their functions. The Board Charter supplements our By-Laws, MCG and CoC in upholding good CG within Globe Telecom's corporate culture, which begins at the Board level. Charter of the Board of Directors https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Board-of-Directors-Charter.pdf	
2. Board Charter serves as a guide to the directors in the performance of their functions.	COMPLIANT		
3. Board Charter is publicly available and posted on the company's website.	COMPLIANT		
Additional Recommendation to Principle 2			
1. Board has a clear insider trading policy.	COMPLIANT	Our insider trading policy is posted on our company website and included in our MCG. Company website – Insider Trading Policy	

		https://www.globe.com.ph/about-us/corporate-governance/company-policies.html MCG (Article VII, Section 15.3), pp. 49-50 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf	
Optional: Principle 2			
1. Company has a policy on granting loans to directors, either forbidding the practice or ensuring that the transaction is conducted at arm's length basis and at market rates.	COMPLIANT	Loans or advances to and from individual directors, including their spouses, children and dependent siblings and parents are covered by our policy on RPTs and is identified under the policy's coverage and materiality threshold to ensure transactions are conducted at arm's length and fairly. Policy on RPTs (page 1) https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/related-party-transactions/Policy-on-RPTs/Policy-on-RPTs.pdf	
2. Company discloses the types of decision requiring board of directors' approval.	COMPLIANT	The Board is Globe Telecom's highest governing body. Therefore, it is entrusted to conduct fair business transactions with the company and to make strategic business decisions without bias. The decision-making and approval powers of the Board is in accordance with applicable law. Our Charter of the Board and MCG serve as guidelines for each director in upholding integrity and the company's best interest in every decision to be made. Disclosure of Board approvals are done in accordance with applicable regulatory rules and regulations. Relevant disclosures made in relation to this, among others, are also posted on our website and categorized. Company website – SEC/PSE Disclosures https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2018/Annual/annual-report-17a/GLO-17A-2018.pdf	
Principle 3: Board committees should be set up to the extent possible to support the effective performance of the Board's functions, particularly with respect to audit, risk management, related party transactions, and other key corporate governance concerns, such as nomination and			

remuneration. The composition, functions and responsibilities of all committees established should be contained in a publicly available Committee Charter.			
Recommendation 3.1			
1. Board establishes board committees that focus on specific board functions to aid in the optimal performance of its roles and responsibilities.	COMPLIANT	Board Committees created by our Board are appointed during the organizational meeting of the Board held immediately after ASMs. In 2018, there were five Board Committees namely the Executive Committee, Audit and RPT Committee, Compensation and Remuneration Committee, Nomination and Governance Committee, and the Finance Committee. In 2019, Globe further updated these with the addition of the Board Risk Oversight Committee (BROC). Disclosures on the organization of the Board Committees are on our website. Company website – Board Committees https://www.globe.com.ph/about-us/corporate-governance/board-of-directors/committees.html 2018 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/Results-of-2018-ASM-and-Organizational-Board-Meeting-SECReceived17Apr2018.pdf 2019 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2019/GLO-17C-ASM-2019-Results-and-Org-Meeting-Results-PSEReceived23Apr2019.pdf IR for 2018 (pp. 87-89) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
Recommendation 3.2			
1. Board establishes an Audit Committee to enhance its oversight capability over the company's financial reporting, internal control system, internal and external audit processes, and compliance with applicable laws and regulations.	COMPLIANT	Our Audit and RPT Committee's Charter states, among others, the oversight capability of the Committee over our financial reporting, internal control system, internal and external/independent audit processes, and compliance with other applicable laws and regulations as well as recommendatory function in appointing and/or removing	

		our external/independent auditor. Our MCG serves as a supplement to the Committee's Charter. Charter of the Audit and RPT Committee https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Audit-and-RPTs-Committee-Charter.pdf MCG (Article II, Section 3.2), pp. 17-21 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf	
2. Audit Committee is composed of at least three appropriately qualified non-executive directors, the majority of whom, including the Chairman is independent.	COMPLIANT	Our Audit and RPT Committee is composed entirely of non-executive directors (NEDs), majority of whom are independent directors including the Committee Chairman. The profiles of our directors for the year 2018 are contained in our IR, SEC Form 17-A and DIS. Updated profiles of our directors are found on our website. Our entire Board, including our Audit and RPT Committee, is composed of appropriately qualified directors with relevant background, knowledge, skills and/or experience in the areas of accounting, auditing and finance. 2018 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/Results-of-2018-ASM-and-Organizational-Board-Meeting-SECReceived17Apr2018.pdf 2019 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2019/GLO-17C-ASM-2019-Results-and-Org-Meeting-Results-PSEReceived23Apr2019.pdf IR (pp. 116-127) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf SEC Form 17-A for 2018 (pp. 100-106)	
3. All the members of the committee have relevant background, knowledge, skills, and/or experience in the areas of accounting, auditing and finance.	COMPLIANT		

		https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2018/Annual/annual-report-17a/GLO-17A-2018.pdf DIS (pp. 30-35) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf	
4. The Chairman of the Audit Committee is not the Chairman of the Board or of any other committee.	COMPLIANT	The 2018 Chairman of our Audit and RPT Committee is Mr. Cirilo P. Noel. Mr. Noel is not the Chairman of the Board or of any other committee. 2018 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/Results-of-2018-ASM-and-Organizational-Board-Meeting-SECReceived17Apr2018.pdf IR (page 87) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
Supplement to Recommendation 3.2			
1. Audit Committee approves all non-audit services conducted by the external auditor.	COMPLIANT	Part of the responsibilities of the Audit and RPT Committee is to review and approve non-audit services conducted by the external/independent auditor. Our Audit and RPT Committee also stated this in their annual report, which is included in our IR. Charter of the Audit and RPT Committee (Section 3.7), page 10 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Audit-and-RPTs-Committee-Charter.pdf IR (pp. 138-139) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	

2. Audit Committee conducts regular meetings and dialogues with the external audit team without anyone from management present.	COMPLIANT	Our Audit and RPT Committee held a total of four (4) regular meetings in 2018. The Committee holds regular dialogues with our external/independent auditor and executive sessions as necessary. This was stated in the annual report of the Audit and RPT Committee in our IR. Charter of the Audit and RPT Committee (pp. 4, 18) https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Audit-and-RPTs-Committee-Charter.pdf IR (pp. 138-139) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
Optional: Recommendation 3.2			
1. Audit Committee meet at least four times during the year.	COMPLIANT	Our Audit and RPT Committee met four (4) times in 2018. This is identified in our IR, posted on our website and included in the Committee's annual report. IR (pp. 87, 138-139) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf Company website – Board Committee Attendance https://www.globe.com.ph/about-us/corporate-governance/board-of-directors/committees.html	
2. Audit Committee approves the appointment and removal of the internal auditor.	COMPLIANT	In line with our Audit and RPT Committee's Charter, the Committee recommends the appointment and/or grounds for approval of the Chief Audit Executive and directs the Internal Audit function. Globe Telecom has an in-house internal audit function. Charter of the Audit and RPT Committee (Section 3.1), page 9 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Audit-and-RPTs-Committee-Charter.pdf	
Recommendation 3.3			

1. Board establishes a Corporate Governance Committee tasked to assist the Board in the performance of its corporate governance responsibilities, including the functions that were formerly assigned to a Nomination and Remuneration Committee.	COMPLIANT	Our Board has a Nomination and Governance Committee with members appoint at the organizational meeting held immediately after our ASMs. Our Nomination and Governance Committee's Charter states, among others, the function of the Committee in assisting the Board in the performance of its CG responsibilities. Identifying the quality of directors aligned with the company's strategic direction, vision, mission and values is also part of the Committee's responsibility. Our MCG serves as a supplement to the Committee's Charter. 2018 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/Results-of-2018-ASM-and-Organizational-Board-Meeting-SECReceived17Apr2018.pdf Charter of the Nomination and Governance Committee (Section 1), page 2 https://www.globe.com.ph/about-us/corporate-governance.htmlcontent/dam/multi-microsites/docs/2018/Globe-Nomination-and-Governance-Committee-Charter.pdf MCG (Article II, Section 3.3), pp. 21-22 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf	
2. Corporate Governance Committee is composed of at least three members, all of whom should be independent directors.	COMPLIANT	Our Nomination and Governance Committee is composed entirely of non-executive, independent directors including its Committee Chairman. The profiles of our directors for the year 2018 are contained in our IR, SEC Form 17-A and DIS. Updated profiles of our directors are found in our website. 2018 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/Results-of-2018-ASM-and-Organizational-Board-Meeting-SECReceived17Apr2018.pdf IR (pp. 88, 125-127)	

		https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf SEC Form 17-A for 2018 (pp. 114-118) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2018/Annual/annual-report-17a/GLO-17A-2018.pdf DIS (pp. 33-35) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf	
3. Chairman of the Corporate Governance Committee is an independent director.	COMPLIANT	The Chairman of our Nomination and Governance Committee, Mr. Rex Ma. A. Mendoza, is a non-executive, independent director. He is our lead ID. Mr. Mendoza's profile is also contained in our IR, SEC Form 17-A and DIS. Updated profiles of our directors are found in our website. 2018 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/Results-of-2018-ASM-and-Organizational-Board-Meeting-SECReceived17Apr2018.pdf IR (page 88, 125) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf SEC Form 17-A for 2018 (page 117) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2018/Annual/annual-report-17a/GLO-17A-2018.pdf DIS (page 33) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf	

Optional: Recommendation 3.3.			
1. Corporate Governance Committee meet at least twice during the year.	COMPLIANT	Our Nomination and Governance Committee met twice in 2018. This is identified in our IR and posted on our website. IR (page 89) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf Company website – Board Committee Attendance https://www.globe.com.ph/about-us/corporate-governance/board-of-directors/committees.html	
Recommendation 3.4			
1. Board establishes a separate Board Risk Oversight Committee (BROC) that should be responsible for the oversight of a company's Enterprise Risk Management system to ensure its functionality and effectiveness.	COMPLIANT	The overall responsibility for our RM oversight rests with the Board. Various committees have been designated to provide RM oversight for specific risk areas. During the Board's organizational meeting after our most recent ASM on 23 April 2019, a separate Board Risk Oversight Committee (BROC) was established and organized to assist the Board for the oversight of our ERM system to ensure its functionality and effectiveness. The BROC is composed of four (4) members, three (3) of whom are IDs including the Committee Chair – Ms. Saw Phaik Hwa. 2019 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2019/GLO-17C-ASM-2019-Results-and-Org-Meeting-Results-PSEReceived23Apr2019.pdf Company website – Board Committees https://www.globe.com.ph/about-us/corporate-governance/board-of-directors/committees.html Meanwhile, the Management-Level Risk Management Committee (MLRMC), chaired by our CRO, exists to assist the Board in fulfilling its oversight responsibilities in relation to risk governance in Globe and to enable: • Cultivation of an organizational structure with a sound ERM framework effectively working in place that supports strong CG.	
2. BROC is composed of at least three members, the majority of whom should be independent directors, including the Chairman.	COMPLIANT		

		• Clear definition of risk taking responsibility and authority. • Ownership and accountability of risk taking and ensure proper segregation of duties. Our MLRMC Charter is posted on our company website: Charter of the MLRMC https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/enterprise-risk-management/Risk-Management-Committee-Charter.pdf IR (pp. 107-108) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf 2018 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/Results-of-2018-ASM-and-Organizational-Board-Meeting-SECReceived17Apr2018.pdf	
3. The Chairman of the BROC is not the Chairman of the Board or of any other committee.	COMPLIANT	The Chairman of our BROC is Ms. Saw Phaik Hwa, who is not the Chairman of the Board or of any other committee. Ms. Saw, together with the other director members of the BROC, have relevant thorough knowledge and experience on risk and RM in their previous corporate backgrounds and executive roles. Ms. Saw's profile, together with our other directors', is in our IR, DIS, SEC Form 17-A, and regularly updated on our website. The Chairman of our MLRMC, is our CRO – Ms. Rosemarie Maniego-Eala. Ms. Maniego-Eala is not the Chairman of the Board or of any other committee. Ms. Maniego-Eala has relevant thorough knowledge and experience on risk and RM. Ms. Maniego-Eala was re-appointed as our CFO, Treasurer and CRO during the organizational meeting of the Board held after our 2018 and 2019 ASMs. 2018 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-	
4. At least one member of the BROC has relevant thorough knowledge and experience on risk and risk management.	COMPLIANT		

		stockholders-meeting/2018/Results-of-2018-ASM-and-Organizational-Board-Meeting-SECReceived17Apr2018.pdf 2019 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2019/GLO-17C-ASM-2019-Results-and-Org-Meeting-Results-PSEReceived23Apr2019.pdf IR for 2018 (pp. 91, 125-127) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf DIS (pp. 33-35, 44) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf Company website – Board of Directors https://www.globe.com.ph/about-us/corporate-governance/board-of-directors.html Company website – Key Officers https://www.globe.com.ph/about-us/corporate-governance/key-officers.html	
Recommendation 3.5			
1. Board establishes a Related Party Transactions (RPT) Committee, which is tasked with reviewing all material related party transactions of the company.	COMPLIANT	Our Audit and RPT Committee is composed of a majority of IDs, including the Chairman. The Committee Charter states, among others, the function of the Committee in reviewing all material RPTs of Globe. Our policy on RPTs and MCG serve as supplements to the Committee's Charter. 2018 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/Results-of-2018-ASM-and-Organizational-Board-Meeting-SECReceived17Apr2018.pdf 2019 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-	

		stockholders-meeting/2019/GLO-17C-ASM-2019-Results-and-Org-Meeting-Results-PSEReceived23Apr2019.pdf Charter of the Audit and RPT Committee https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Audit-and-RPTs-Committee-Charter.pdf Policy on RPTs https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/related-party-transactions/Policy-on-RPTs/Policy-on-RPTs.pdf MCG (Article II, Section 3.2), pp. 17-20 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf	
2. RPT Committee is composed of at least three non-executive directors, two of whom should be independent, including the Chairman.	COMPLIANT	Our Audit and RPT Committee is composed of four (4) non-executive directors, three (3) of whom are also IDs including the Committee Chairman, Mr. Rex Ma. A. Mendoza. The profiles of our directors for the year 2018 are contained in our IR, SEC Form 17-A and DIS. Profiles of our directors are regularly updated through our website. 2018 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/Results-of-2018-ASM-and-Organizational-Board-Meeting-SECReceived17Apr2018.pdf IR (pp. 116-127) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf SEC Form 17-A for 2018 (pp. 100-106) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2018/Annual/annual-report-17a/GLO-17A-2018.pdf DIS (pp. 30-35)	

		https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf	
Recommendation 3.6			
1. All established committees have a Committee Charter stating in plain terms their respective purposes, memberships, structures, operations, reporting process, resources and other relevant information.	COMPLIANT	All our Board Committees have their respective Charters, which are all posted on our company website. These Charters also supplement in evaluating the performance of the Committees, which is embedded in the Board self-assessment questionnaire. Company website – Board Committees and their Charters https://www.globe.com.ph/about-us/corporate-governance/board-of-directors/committees.html Board Self-Assessment Questionnaire https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/GLO-Board-Self-Assessment-Form-2017.pdf	
2. Committee Charters provide standards for evaluating the performance of the Committees.	COMPLIANT		
3. Committee Charters were fully disclosed on the company's website.	COMPLIANT		
Principle 4: To show full commitment to the company, the directors should devote the time and attention necessary to properly and effectively perform their duties and responsibilities, including sufficient time to be familiar with the corporation's business.			
Recommendation 4.1			
1. The Directors attend and actively participate in all meetings of the Board, Committees and shareholders in person or through tele-/videoconferencing conducted in accordance with the rules and regulations of the Commission.	COMPLIANT	In accordance with our Charter of the Board and MCG, members of the Board should attend and actively participate in all regular and special meetings of the Board, Committees, and shareholders' in person or via teleconference or videoconference or by any other technological means allowed by the SEC. A director's presence in meetings is still prioritized. The absence of a director in more than fifty percent (50%) of all regular and special meetings of the Board during his/her incumbency is a ground for disqualification in the succeeding election, unless the absence is due to illness, death in the immediate family, serious accident or other unforeseen or fortuitous events. Such meetings shall be scheduled before the start of the financial year and the schedule shall be made available through the Globe website. Board materials/papers shall be provided to each director at least seven (7) days prior to the meetings set. Directors are encouraged to review meeting materials and if called for, ask the necessary questions or seek clarifications and	
2. The directors review meeting materials for all Board and Committee meetings.	COMPLIANT		
3. The directors ask the necessary questions or seek clarifications and explanations during the Board and Committee meetings.	COMPLIANT		

		explanations. Discussions with independent views during meetings are encouraged, given due consideration and properly documented through the minutes of meetings. Our Corporate Secretary and Chief Compliance Officer attest to these facts as attendees in the Board and some of the Committee meetings. MCG (Article II, Section 4.1), pp. 25-26 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Charter of the Board of Directors (Article II, Section 1.13.1), page 13 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Attendance of Directors to Board Meetings in 2018 https://www.globe.com.ph/about-us/corporate-governance/board-of-directors/meetings.html Company website – Board Committee Attendance https://www.globe.com.ph/about-us/corporate-governance/board-of-directors/committees.html	
Recommendation 4.2			
1. Non-executive directors concurrently serve in a maximum of five publicly-listed companies to ensure that they have sufficient time to fully prepare for minutes, challenge Management's proposals/views, and oversee the long-term strategy of the company.	COMPLIANT	In accordance with our MCG and Charter of the Board, our non-executive directors may concurrently serve as directors to a maximum of five (5) publicly-listed companies to ensure that they have sufficient time to fully prepare for meetings, challenge Management's proposals or views, and oversee the long-term strategy of the Corporation. This shall not include directorships in the Corporation's subsidiaries, affiliates, parent corporation, and affiliates and subsidiaries of the parent corporation. Consequently, our President and CEO and other executive directors may be covered by a lower indicative limit for membership in other boards, but in no case shall any executive director serve as such on more than two (2) boards of publicly-listed companies outside the group. A similar limit may apply to independent or non-executive	

		directors who, at the same time serve as full-time executives in other corporations. In any case the capacity of directors to diligently and efficiently perform their duties and responsibilities to the boards they serve should not be compromised. Charter of the Board of Directors (Article II, Section 1.9), pp. 11-12 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf MCG (Article II, Section 4.2), page 26 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf IR (pp. 116-127) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf DIS (pp. 30-35) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf	
Recommendation 4.3			
1. The directors notify the company's board before accepting a directorship in another company.	COMPLIANT	In accordance with our MCG and Charter of the Board, a director shall notify the Board where he/she is an incumbent director before accepting a directorship in another corporation. This is for the Corporation to be able to assess if his/her present responsibilities and commitment to the Corporation will be affected and if the director can still adequately provide what is expected of him/her in his/her function as director. Our Chief Compliance Officer attests that the directors in our Board comply with this provision in our MCG and Charter of the Board. This is also covered by the Certification of Compliance with our MCG. Charter of the Board of Directors (Article II, Section 1.9)	

		https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf MCG (Article II, Section 4.2), page 26 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf IR (page 136) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
Optional: Principle 4			
1. Company does not have any executive directors who serve in more than two boards of listed companies outside of the group.	COMPLIANT	In accordance with our Charter of the Board and MCG, our President and CEO, our executive director, shall not serve as such on more than two (2) boards of publicly-listed companies outside our company's group. Our President and CEO, Mr. Ernest Cu, does not serve in any other Board of a publicly-listed company. Mr. Cu's profile is in our DIS, SEC Form 17-A and IR. Charter of the Board of Directors (Article II, Section 1.9), page 11 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf MCG (Article II, Section 4.2), page 26 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf IR (pp. 85, 120) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf SEC Form 17-A for 2018 (page 102)	

		https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2018/Annual/annual-report-17a/GLO-17A-2018.pdf DIS (page 31) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf	
2. Company schedules board of directors' meetings before the start of the financial year. 3.	COMPLIANT	In accordance with our MCG and Charter of the Board, our Board meetings are scheduled before the start of the financial year and the schedule is made available through our company website together with the disclosure of attendance of directors for the most recently concluded year: MCG (Article II, Section 4.1), page 25 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Charter of the Board of Directors (Article II, Section 1.13.1), page 13 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Company website – Board Meetings https://www.globe.com.ph/about-us/corporate-governance/board-of-directors/meetings.html	
4. Board of directors meet at least six times during the year.	COMPLIANT	Our Board held seven (7) Board meetings in 2018. This is on our company website: Company website – Board Meetings https://www.globe.com.ph/about-us/corporate-governance/board-of-directors/meetings.html	
5. Company requires as minimum quorum of at least 2/3 for board decisions.	NON-COMPLIANT		We abide by the provisions of the Corporation Code on quorum in board meetings. Under our By-Laws, "a majority of the directors shall

			constitute a quorum for the transaction of corporate business, and every decision of a majority of the quorum duly assembled as a board shall be valid as a corporate act". GLO By-Laws (Article II, Section 2), page 5 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/by-laws/By-Laws.pdf
Principle 5: The board should endeavor to exercise an objective and independent judgment on all corporate affairs			
Recommendation 5.1			
1. The Board has at least 3 independent directors or such number as to constitute one-third of the board, whichever is higher.	COMPLIANT	Results of the ASM on 17 April 2018 and our most recent ASM on 23 April 2019 were properly disclosed, where, among other approved resolutions by our shareholders, our Board of Directors for the year was elected including independent directors. Three (3) independent directors were elected. The disclosures are posted on our company website: 2018 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/Results-of-2018-ASM-and-Organizational-Board-Meeting-SECReceived17Apr2018.pdf 2019 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2019/GLO-17C-ASM-2019-Results-and-Org-Meeting-Results-PSEReceived23Apr2019.pdf	
Recommendation 5.2			
1. The independent directors possess all the qualifications and none of the disqualifications to hold the positions.	COMPLIANT	All our IDs go through evaluation/deliberation of qualifications upon nomination to ensure that they are all qualified and do not possess any of the disqualifications in accordance with applicable law, our MCG, Charter of the	

		Board and Charter of the Nomination and Governance Committee. Likewise, our IDs' profiles, together with the rest of the Board, are disclosed in our DIS, SEC Form 17-A and IR. Our directors' profiles are also updated regularly on our company website. MCG (Article II, Section 5.2), pp. 27-28 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Charter of the Board of Directors (Article II, Section 1.4), pp. 4-5 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Charter of the Nomination and Governance Committee (Section 6) https://www.globe.com.ph/about-us/corporate-governance.htmlcontent/dam/multi-microsites/docs/2018/Globe-Nomination-and-Governance-Committee-Charter.pdf IR (pp. 116-127) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf SEC Form 17-A for 2018 (pp. 100-106) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2018/Annual/annual-report-17a/GLO-17A-2018.pdf DIS (pp. 30-35) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf	
Supplement to Recommendation 5.2			

1. Company has no shareholder agreements, by-laws provisions, or other arrangements that constrain the directors' ability to vote independently.	COMPLIANT	We have no shareholder agreements, by-laws provisions or other arrangements that constrain our directors' ability to vote independently. Globe Telecom, in fact, encourages all directors, including IDs, to vote and decide independently. This is also included in our MCG and Charter of the Board. MCG (Article II, Section 2.3(d)), page 10 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Charter of the Board of Directors (Article II, Section 1.8.2(a, d); Section 1.9(d)), pp. 8-9, 11 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf	
Recommendation 5.3			
1. The independent directors serve for a cumulative term of nine years (reckoned from 2012).	COMPLIANT	In line with our MCG and Charter of the Board, our IDs may serve as such for a maximum cumulative term of nine (9) years in accordance with the SEC Code of CG. After which, the ID is perpetually barred from re-election as such in Globe Telecom, but may be re-elected as a non-independent or regular director. Should we want to retain the ID even after the nine (9) years, the Board must provide meritorious justification on the matter and seek shareholders' approval during an ASM. None of our IDs have reached this maximum limit. MCG (Article II, Section 5.3), page 28 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Charter of the Board of Directors (Article II, Section 1.3), page 15 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf	
2. The company bars an independent director from serving in such capacity after the term limit of nine years.	COMPLIANT		
3. In the instance that the company retains an independent director in the same capacity after nine years, the board provides meritorious justification and seeks shareholders' approval during the annual shareholders' meeting.	COMPLIANT		

		IR (pp. 125-127) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf SEC Form 17-A for 2018 (pp. 105-106) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2018/Annual/annual-report-17a/GLO-17A-2018.pdf DIS (pp. 33-35) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf	
Recommendation 5.4			
1. The positions of Chairman of the Board and Chief Executive Officer are held by separate individuals.	COMPLIANT	Globe Telecom's Chairman of the Board of Directors is Mr. Jaime Augusto Zobel de Ayala, while our President and CEO is Mr. Ernest L. Cu. Together with the rest of our directors in the Board, Mr. Zobel and Mr. Cu were also elected by our stockholders at the 2018 ASM on 17 April 2018 and our most recent ASM on 23 April 2019. 2018 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/Results-of-2018-ASM-and-Organizational-Board-Meeting-SECReceived17Apr2018.pdf 2019 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2019/GLO-17C-ASM-2019-Results-and-Org-Meeting-Results-PSEReceived23Apr2019.pdf	
2. The Chairman of the Board and Chief Executive Officer have clearly defined responsibilities.	COMPLIANT	Our Chairman of the Board and CEO are separate individuals. Their duties and responsibilities are clearly defined in our By-Laws, MCG and Charter of the Board. By-Laws (Article III, Section 1, Section 5-A and Section 5), pp. 7-8	

		https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/by-laws/By-Laws.pdf MCG (Article II, Section 2.4 and Section 5.4), pp. 11, 28-29 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Charter of the Board of Directors (Article I, Section 1.10), page 12 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf	
Recommendation 5.5			
1. If the Chairman of the Board is not an independent director, the board designates a lead director among the independent directors.	COMPLIANT	Mr. Rex Ma. A. Mendoza was elected as our lead independent director for 2018 and for 2019. Our lead ID's roles and responsibilities are in our MCG and Charter of the Board. 2018 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/Results-of-2018-ASM-and-Organizational-Board-Meeting-SECReceived17Apr2018.pdf 2019 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2019/GLO-17C-ASM-2019-Results-and-Org-Meeting-Results-PSEReceived23Apr2019.pdf MCG (Article II, Section 5.5), page 29 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Charter of the Board of Directors (Article I, Section 1.10), page 12	

		https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf	
Recommendation 5.6			
1. Directors with material interest in a transaction affecting the corporation abstain from taking part in the deliberations on the transaction.	COMPLIANT	Our MCG provides for the liability of directors to abstain from taking part in the deliberations of any transaction that a director has a material interest in. There was no transaction in 2018 that required any director to abstain from its deliberation. All our RPTs are disclosed in our AFS, DIS and SEC Form 17-A. MCG (Article II, Section 5.6), page 29 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf AFS for 2018 (pp. 76-82 of the Notes to the Consolidated Financial Statements) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2018/Annual/audited-financial-statements/GLO-Conso-FS-2018-SECReceived28Feb2019-final.pdf AFS for 2017 (pp. 73-79 of the Notes to the Consolidated Financial Statements) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/audited-financial-statements/GLO-Audited-FS-2017.pdf DIS (pp. 73-79 of the Notes to the Consolidated Financial Statements) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf SEC Form 17-A (pp. 76-82 of the Notes to the Consolidated Financial Statements, or pp. 204-210 of the PDF file) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2018/Annual/annual-report-17a/GLO-17A-2018.pdf	
Recommendation 5.7			

1. The non-executive directors (NEDs) have separate periodic meetings with the external auditor and heads of the internal audit, compliance and risk functions, without any executive present.	COMPLIANT	Our NEDs, under our MCG, have separate periodic meetings with the external auditor and heads of the internal audit, compliance and risk functions, without any executive director present to ensure that proper checks and balances are in place. Our NEDs may consult with relevant heads in management as necessary. NED meetings are chaired by, Mr. Rex Ma. A. Mendoza, our lead ID. As such, the NED meeting on 6 December 2018 as identified in our IR and attested to by our IDs present during the said meeting in this report, was led by Mr. Mendoza. MCG (Article II, Section 5.7), page 30 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf IR (page 90) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
2. The meetings are chaired by the lead independent director.	COMPLIANT		
Optional: Principle 5			
1. None of the directors is a former CEO of the company in the past 2 years.	COMPLIANT	Our current CEO, Ernest L. Cu has been our CEO since 2009. Thus, none of our current directors has been our CEO for the past 2 years. Company website – Profile of Mr. Cu https://www.globe.com.ph/about-us/corporate-governance/board-of-directors.html	
Principle 6: The best measure of the Board's effectiveness is through an assessment process. The Board should regularly carry out evaluations to appraise its performance as a body, and assess whether it possesses the right mix of backgrounds and competencies.			
Recommendation 6.1			
1. Board conducts an annual self-assessment of its performance as a whole.	COMPLIANT	Our MCG and Charter of the Board provide our policy and procedures for our Board's annual self-assessment done through a self-assessment questionnaire. Our Board self-assessment questionnaire includes evaluation of performance of our Chairman, individual members, each committee and our Management. Our self-assessment questionnaire is available on our company website. Every	
2. The Chairman conducts a self-assessment of his performance.	COMPLIANT		
3. The individual members conduct a self-assessment of their performance.	COMPLIANT		

		three (3) years, the assessment shall be supported by an external facilitator. Our Chief Compliance Officer facilitates the annual self-assessment, collates accomplished questionnaires and creates a summary of results thereafter. The results of the annual self-assessments of our Board are kept by the Office of our Chief Compliance Officer. As part of shareholders' rights, shareholders may access such corporate documents upon request. Compliance with our MCG is issued by our Chief Compliance Officer and countersigned by our CEO as posted on our website and included in our IR. MCG (Article II, Section 6), page 30 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Charter of the Board of Directors (Article I, Section 1.14), page 14 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Company website – Board Performance https://www.globe.com.ph/about-us/corporate-governance/board-of-directors/performance.html Company website – Certificate of Compliance https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/reports-and-certifications/2018/Certificate-of-Compliance-with-MCG-2018.pdf IR for 2018 (page 136) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
4. Each committee conducts a self-assessment of its performance.	COMPLIANT		
5. Every three years, the assessments are supported by an external facilitator.	COMPLIANT	Our Chief Compliance Officer facilitates the annual self-assessment, collates accomplished questionnaires and	

		creates a summary of results thereafter. In line with our MCG and Charter of the Board, the self-assessment exercise shall be supported by an external facilitator every three (3) years. Globe Telecom shall explore options for the external facilitator for the self-assessment exercise in 2020. MCG (Article II, Section 6), page 30 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Charter of the Board of Directors (Article I, Section 1.14), page 14 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf	
Recommendation 6.2			
1. Board has in place a system that provides, at the minimum, criteria and process to determine the performance of the Board, individual directors and committees.	COMPLIANT	Our MCG and Charter of the Board provide for criteria and process to determine performance of the Board, directors and committees. The performance of the Board including the chairman, individual members, each committee and management are evaluated through our Board self-assessment questionnaire. Our self-assessment questionnaire is available on our company website. MCG (Article II, Section 6), page 30 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Charter of the Board of Directors (Article I, Section 1.14), page 14 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Company website – Board Performance, Self-Assessment Questionnaire	

		https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/GLO-Board-Self-Assessment-Form-2017.pdf	
2. The system allows for a feedback mechanism from the shareholders.	COMPLIANT	Our MCG and Charter of the Board lay out our policy and practice in promoting stakeholder feedback and engagement. Apart from our ASMs, we make available to our stakeholders various communication channels so we are in tune with feedback from our shareholders, subscribers and other stakeholders. These channels include, among others, investor briefings, press conferences, road shows, our social media accounts (i.e. Twitter, Facebook, E-mail) and hotline. These channels are discussed in our IR and posted on our website. IR (pp. 51-52, 99) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf MCG (Article II, Section 6.2), page 30 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Charter of the Board of Directors (Article I, Section 1.11), page 19 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Company website – Contact Us https://www.globe.com.ph/contact-us.html	
Principle 7: Members of the Board are duty-bound to apply high ethical standards, taking into account the interests of all stakeholders.			
Recommendation 7.1			
1. Board adopts a Code of Business Conduct and Ethics, which provide standards for professional and ethical behavior, as well as articulate acceptable and	COMPLIANT	In addition to our MCG, Board Charter and different committee Charters, our Board also subjects itself to the policies, guidelines and rules under our Code of Conduct (CoC). The Board recognizes that corporate values and	

unacceptable conduct and practices in internal and external dealings of the company.		governance as well as making a stand against corrupt practices are part of setting good CG culture in the organization. As such, the Board looks to the anti-corruption policy and other values espoused in the CoC. As part of a new director's and employee's orientation into Globe, a director/employee is oriented with our policies and practices that include, among others, our MCG, Charter of the Board, different committee Charters and our CoC. Our CoC is on our company website and discussed in our IR. In addition, an annual Certification of Compliance with our CoC is issued and signed by our Chief Human Resource Officer (CHRO). IR (pp. 84-86, 95-96, 137) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf Code of Conduct and Ethics https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/company-policies/Code-of-Conduct.pdf	
2. The Code is properly disseminated to the Board, senior management and employees.	COMPLIANT		
3. The Code is disclosed and made available to the public through the company website.	COMPLIANT		
Supplement to Recommendation 7.1			
1. Company has clear and stringent policies and procedures on curbing and penalizing company involvement in offering, paying and receiving bribes.	COMPLIANT	Our policy and procedures for curbing and penalizing company involvement in offering, paying and receiving bribes are contained in our CoC and anti-corruption policy. The same is identified under grounds for disqualification of our directors under our MCG and Charter of the Board. Code of Conduct and Ethics (Article 13), pp. 9, 49 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/company-policies/Code-of-Conduct.pdf MCG (Article II, Section 2.9; Article VI, Section 15.6), pp. 14, 52 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf	

		Charter of the Board of Directors (Article I, Section 1.3.1(c)), page 2 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Company website – Company Policies https://www.globe.com.ph/about-us/corporate-governance/company-policies.html	
Recommendation 7.2			
1. Board ensures the proper and efficient implementation and monitoring of compliance with the Code of Business Conduct and Ethics.	COMPLIANT	Part of the responsibilities of our Board is to comply with relevant rules and regulations of the company and other applicable laws, as well as ensure compliance with the same by the organization. The Corporate Secretary and Chief Compliance Officer assist the Board in compliance with relevant rules and regulations. Our CoC covers all directors and Globe employees. There has been no incident of non-compliance with the CoC at the Board level, meanwhile any finding of non-compliance or violation with our CoC among employees remains confidential with our HR Labor Relations team. Rest assured, proper processes are in place to ensure such non-compliance is resolved and addressed properly, in accordance with our CoC and applicable labor laws. In accordance with our thrust to sustain good CG in our business culture, our CHRO certifies our annual compliance with our CoC. Code of Conduct and Ethics https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/company-policies/Code-of-Conduct.pdf MCG (Article II, Section 1.4-1.5, 7.2), pp. 4-5, 30 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Charter of the Board of Directors (Article II, Section 1.1; Article III, Section 1.1), pp. 14, 19-20	
2. Board ensures the proper and efficient implementation and monitoring of compliance with company internal policies.	COMPLIANT		

		https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Certificate of Compliance with the CoC https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/reports-and-certifications/2018/Certificate-of-Compliance-with-CoC-2018.pdf	
Disclosure and Transparency			
Principle 8: The company should establish corporate disclosure policies and procedures that are practical and in accordance with best practices and regulatory expectations.			
Recommendation 8.1			
1. Board establishes corporate disclosure policies and procedures to ensure a comprehensive, accurate, reliable and timely report to shareholders and other stakeholders that gives a fair and complete picture of a company's financial condition, results and business operations.	COMPLIANT	Apart from applicable laws, our MCG and Charter of the Board provide for disclosure requirements of our Board. These include, among others, disclosure on our quarterly financial performance, dividend declarations, disclosure form on changes in a director's ownership of securities of the company, and the integrated report. Our DIS and SEC Form 17-A also contain annual audited financial statements. All our reports and disclosures are available on our company website. Disclosures submitted to the SEC and PSE are also provided a separate section on our company website. MCG (Article III, Section 8), pp. 31-33 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf IR for 2018 (pp. 98-101, 143) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf Company website – SEC/PSE Disclosures https://www.globe.com.ph/about-us/investor-relations/sec-pse-disclosures.html	

		Charter of the Board of Directors (Article II, Section 1.7, Section 1.10), pp. 17, 18 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf SEC Form 17-A for 2018 https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2018/Annual/annual-report-17a/GLO-17A-2018.pdf DIS https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf	
Supplement to Recommendations 8.1			
1. Company distributes or makes available annual and quarterly consolidated reports, cash flow statements, and special audit revisions. Consolidated financial statements are published within ninety (90) days from the end of the fiscal year, while interim reports are published within forty-five (45) days from the end of the reporting period.	COMPLIANT	Our submissions of our consolidated audited financial statements and quarterly reports for the year 2018 were as follows: Consolidated Audited Financial Statements for 2018 Submission date – February 28, 2019 End of fiscal year – December 31, 2018 Number of days between submission/release and end of fiscal year – 59 days https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2018/Annual/audited-financial-statements/GLO-Conso-FS-2018-SECReceived28Feb2019-final.pdf Quarterly Report for 1Q2018 Submission date – May 7, 2018 End of quarter – March 31, 2018 Number of days between submission/release and end of reporting period – 37 days https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2018/Quarterly/Quarterly-Report-17-Q/GLO-17Q-1Q18.pdf	

		Quarterly Report for 2Q2018 Submission date – August 7, 2018 End of quarter – June 30, 2018 Number of days between submission/release and end of reporting period – 38 days https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2018/Quarterly/Quarterly-Report-17-Q/GLO-17Q-2Q18.pdf Quarterly Report for 3Q2018 Submission date – November 5, 2018 End of quarter – September 30, 2018 Number of days between submission/release and end of reporting period – 36 days https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2018/Quarterly/Quarterly-Report-17-Q/GLO-17Q-3Q18.pdf Quarterly Report for 4Q2018 is included in our SEC Form 17-A submission https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2018/Annual/annual-report-17a/GLO-17A-2018.pdf	
2. Company discloses in its annual report the principal risks associated with the identity of the company's controlling shareholders; the degree of ownership concentration; cross-holdings among company affiliates; and any imbalances between the controlling shareholders' voting power and overall equity position in the company.	COMPLIANT	Globe Telecom's SEC Form 17-A and IR, among other operational and financial information, also contains the principal risks of the company. These risks as stated in our IR are assessed as enterprise-wide, and thus, affect all our shareholders. These top enterprise-wide risks resulted from assessments made by Management. Minority shareholders' risks may also be derived from the discussion of risks included in our AFS. Management feels that there are no risks to our minority shareholders associated with the identity of our controlling shareholders. As such, Globe Telecom recognizes that our identified risks to shareholders will affect both majority and minority shareholders. More importantly, Globe Telecom treats all shareholders equally. Meanwhile, cross-holdings or our conglomerate map is also in our IR and posted on our website.	

		SEC Form 17-A for 2018 (pp. 25-31) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2018/Annual/annual-report-17a/GLO-17A-2018.pdf IR (pp. 108-112) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf AFS (pp. 102-120) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2018/Annual/audited-financial-statements/GLO-Conso-FS-2018-SECReceived28Feb2019-final.pdf	
Recommendation 8.2			
1. Company has a policy requiring all directors to disclose/report to the company any dealings in the company's shares within three business days.	COMPLIANT	In line with our MCG and Charter of the Board, our directors and key officers are required, within three (3) trading days upon change in their ownership of company securities, to submit the statement of changes of ownership in securities to the office of the Chief Compliance Officer for immediate submission to the SEC and PSE and other relevant regulators. These are also posted on our website. The summary of our directors' and officers' dealings in company securities is identified in our IR, including the number of shares, nature of ownership of shares and date of transaction/s. MCG (Article III, Section 8.2), page 32 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Charter of the Board of Directors (Article II, Section 1.7), page 17 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf	
2. Company has a policy requiring all officers to disclose/report to the company any dealings in the company's shares within three business days.	COMPLIANT		

		Company website – Statements of Beneficial Ownership of Securities of Directors and Key Officers for 2018 (SEC Forms 23-A and 23-B) https://www.globe.com.ph/about-us/investor-relations/sec-pse-disclosures.html IR (pp. 100-101) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf DIS (pp. 10-11) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf	
Supplement to Recommendation 8.2			
1. Company discloses the trading of the corporation's shares by directors, officers (or persons performing similar functions) and controlling shareholders. This includes the disclosure of the company's purchase of its shares from the market (e.g. share buy-back program).	COMPLIANT	Apart from our disclosure of changes on company securities by our directors and officers, we also disclose our quarterly public ownership report and periodic updates to our top 100 shareholders which are all posted on our company website together with our conglomerate map. IR (pp. 100-101) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf Company website – Statements of Beneficial Ownership of Securities of Directors and Key Officers for 2018 (SEC Forms 23-A and 23-B) https://www.globe.com.ph/about-us/investor-relations/sec-pse-disclosures.html Company website – Top 100 Shareholders https://www.globe.com.ph/about-us/investor-relations/sec-pse-disclosures.html Company website – Public Ownership Report https://www.globe.com.ph/about-us/investor-relations/sec-pse-disclosures.html Company website – Conglomerate Map	

		https://www.globe.com.ph/about-us/corporate-governance/conglomerate-map.html DIS (pp. 10-11) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf	
Recommendation 8.3			
1. Board fully discloses all relevant and material information on individual board members to evaluate their experience and qualifications, and assess any potential conflicts of interest that might affect their judgment.	COMPLIANT	The profiles of our directors are disclosed in our DIS, SEC Form 17-A and IR. The disclosure includes, among others, the name, age, nationality, academic and corporate background, qualifications, expertise, company shareholdings and company affiliations of each director. Our directors' profiles are also posted on our website. Trainings attended by our directors are disclosed through advisement letters submitted to regulators as well as discussed in our IR, and posted on our website. Our IDs also submit a Certification that contains their relevant institutional and corporate affiliations, which we attach with our DIS. DIS (pp. 30-35, 37-42) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf IR (pp. 116-127) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf SEC Form 17-A for 2018 (pp. 100-106, 113-115) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2018/Annual/annual-report-17a/GLO-17A-2018.pdf Company website – Board Members https://www.globe.com.ph/about-us/corporate-governance/board-of-directors.html	

		2018 Trainings attended by our Directors https://www.globe.com.ph/about-us/corporate-governance/annual-corporate-governance-report.html Company website – Director Training and Continuing Education Program https://www.globe.com.ph/about-us/corporate-governance/board-of-directors/performance.html	
2. Board fully discloses all relevant and material information on key executives to evaluate their experience and qualifications, and assess any potential conflicts of interest that might affect their judgment.	COMPLIANT	The profiles of our key officers are disclosed in our DIS and SEC Form 17-A. The disclosure includes, among others, the name, age, nationality, academic and corporate background, qualifications, expertise, company shareholdings and company affiliations of each officer. Trainings attended by our key officers are disclosed through advisement letters submitted to regulators as well as discussed in our IR. DIS (pp. 43-45) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf IR (pp. 91, 101) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf SEC Form 17-A for 2018 (pp. 107-110, 114) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2018/Annual/annual-report-17a/GLO-17A-2018.pdf 2018 Trainings attended by Key Officers https://www.globe.com.ph/about-us/corporate-governance/annual-corporate-governance-report.html	
Recommendation 8.4			
1. Company provides a clear disclosure of its policies and procedure for setting Board remuneration, including the level and mix of the same.	COMPLIANT	In accordance with our By-Laws, MCG and Charter of the Board, the Board receives, pursuant to a resolution of the shareholders, fees and other compensation for their services as directors and members of committees of the Board of Directors. The per diem remuneration received by	

		each director is disclosed in our annual reports and reflected in the Globe website. The executive director shall not receive per diem remuneration in addition to his remuneration as part of the Corporation's Management in his role as the President and CEO. MCG (Article III, Section 8.4), pp. 32-33 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf By-Laws (Article II, Section 6), page 5 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/by-laws/By-Laws.pdf Charter of the Board (Article III, Section 1.2), page 20 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Board-of-Directors-Charter.pdf DIS (pp. 23-24) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf IR (page 90) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf SEC Form 17-A for 2018 (pp. 110-111) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2018/Annual/annual-report-17a/GLO-17A-2018.pdf	
2. Company provides a clear disclosure of its policies and procedure for setting executive remuneration, including the level and mix of the same.	COMPLIANT	In accordance with our MCG, the policy and procedure for setting executive remuneration is disclosed in our annual reports. Our Board, through the Compensation and Remuneration Committee, also develops the policy on executive remuneration and remuneration packages for	

		officers. The structure shall be kept such that the variable component increases as the executive moves up in the corporate ladder, which is discussed in our DIS, IR and SEC Form 17-A. MCG (Article III, Section 8.4), pp. 32-33 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Charter of the Remuneration and Compensation Committee (page 1) https://www.globe.com.ph/about-us/corporate-governance.htmlcontent/dam/multi-microsites/docs/2018/Com-and-Rem-Committee-Charter-Apr2016.pdf DIS (page 23, and Notes 3.2.9 and 18 of AFS) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf IR (pp. 93-94) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf SEC Form 17-A for 2018 (pp. 111-112, and Notes 3.2.9 and 18 of AFS) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2018/Annual/annual-report-17a/GLO-17A-2018.pdf	
3. Company discloses the remuneration on an individual basis, including termination and retirement provisions.	COMPLIANT	Our employee and executive remuneration components are disclosed in our IR and other annual reports. Actual compensation of our President and CEO is disclosed together with compensation of our identified top paid officers in our DIS. Our MCG contains our retirement provisions for directors and employees. IR (pp. 93-94)	

		https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf DIS (pp. 23, and Notes 3.2.9 and 18 of AFS) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf SEC Form 17-A for 2018 (pp. 111-112, and Notes 3.2.9 and 18 of AFS) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2018/Annual/annual-report-17a/GLO-17A-2018.pdf MCG (Article II, Section 2.11), page 16 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf	
Recommendation 8.5			
1. Company discloses its policies governing Related Party Transactions (RPTs) and other unusual or infrequently occurring transactions in their Manual on Corporate Governance.	COMPLIANT	Our policy on RPTs is in our MCG and posted on our website. The same is disclosed on our company website. No director has had conflicted interest in a transaction discussed at the Board level. MCG (Article II, Section 2.12), page 16 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Policy on RPTs https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/related-party-transactions/Policy-on-RPTs/Policy-on-RPTs.pdf	
2. Company discloses material or significant RPTs reviewed and approved during the year.	COMPLIANT	Our RPTs for the year are disclosed in our annual reports. Per our policy on RPTs, such disclosure includes, but is not limited to, the name of the related party, relationship with the company for each RPT, the nature, and value for each RPT. A historical list of RPTs is also available on our website.	

		DIS (pp. 18-22, Note 16 of AFS) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf SEC Form 17-A for 2018 (pp. 114-117, Note 16 of AFS) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2018/Annual/annual-report-17a/GLO-17A-2018.pdf Company website – Related Party Transactions https://www.globe.com.ph/about-us/corporate-governance/related-party-transactions.html	
Supplement to Recommendation 8.5			
1. Company requires directors to disclose their interests in transactions or any other conflict of interests.	COMPLIANT	In accordance with our MCG and Charter of the Board, the Board shall fully disclose all relevant and material information to evaluate their experience and qualifications, and assess any potential conflicts of interest that might affect their judgment. Our directors also accomplish a conflict of interest disclosure and voluntarily disclose any conflict of interest that may arise within the year. Our policy for directors in relation to their dealings in company securities also state that they must disclose properly to our Chief Compliance Officer their dealings in company securities within three (3) trading days of the transaction. MCG (Article II, Section 2.3(a); Article III, Section 8.2), pp. 10, 32 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Policy on RPTs (Article IV), page 3 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/related-party-transactions/Policy-on-RPTs/Policy-on-RPTs.pdf Company website – Policy on Dealings in Securities by Directors	

		https://www.globe.com.ph/about-us/corporate-governance/company-policies.html	
Optional : Recommendation 8.5			
1. Company discloses that RPTs are conducted in such a way to ensure that they are fair and at arms' length.	COMPLIANT	Our policy on RPTs ensure that material RPTs, if any, are done fairly and at arm's length. Policy on RPTs (Article III), pp. 2-3 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/related-party-transactions/Policy-on-RPTs/Policy-on-RPTs.pdf	
Recommendation 8.6			
1. Company makes a full, fair, accurate and timely disclosure to the public of every material fact or event that occur, particularly on the acquisition or disposal of significant assets, which could adversely affect the viability or the interest of its shareholders and other stakeholders.	COMPLIANT	Our internal policies and MCG are in place to ensure that we make a full, fair, accurate and timely public disclosure of every material fact or event that occur which could adversely affect the viability or the interest of our stakeholders. These periodic material disclosures are also posted on our website. MCG (Article III, Section 8.6), page 33 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf SEC/PSE Disclosures – Other Disclosures https://www.globe.com.ph/about-us/investor-relations/sec-pse-disclosures.html	
2. Board appoints an independent party to evaluate the fairness of the transaction price on the acquisition or disposal of assets.	COMPLIANT	While this is not applicable to Globe Telecom for 2018, our MCG provides for our policy to ensure that our Board will appoint an independent party to evaluate the fairness of the transaction price on the acquisition or disposal of assets should such event take place. MCG (Article III, Section 8.6), page 33 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf	
Supplement to Recommendation 8.6			
1. Company discloses the existence, justification and details on shareholder agreements, voting trust agreements,	COMPLIANT	While this is not applicable to Globe Telecom for 2018, our MCG provides our general disclosure policy to ensure that the company will disclose the existence, justification and	

confidentiality agreements, and such other agreements that may impact on the control, ownership, and strategic direction of the company.		details on shareholder agreements, voting trust agreements, confidentiality agreements, and such other agreements that may impact on the control, ownership, and strategic direction of the company. MCG (Article III, Section 8.6), page 33 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf	
Recommendation 8.7			
1. Company's corporate governance policies, programs and procedures are contained in its Manual on Corporate Governance (MCG).	COMPLIANT	Our MCG is posted on our company website, specifically on the Governance section of our website. The same was submitted to the SEC and PSE in May 2017. Company website – Governance https://www.globe.com.ph/about-us/corporate-governance.html MCG https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf	
2. Company's MCG is submitted to the SEC and PSE.	COMPLIANT		
3. Company's MCG is posted on its company website.	COMPLIANT		
Supplement to Recommendation 8.7			
1. Company submits to the SEC and PSE an updated MCG to disclose any changes in its corporate governance practices.	COMPLIANT	Our MCG, posted on our company website, also reflects the SEC stamp as proof of our most recent submission of the Manual which was on May 30, 2017. MCG https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf	
Optional: Principle 8			
1. Does the company's Annual Report disclose the following information:		Our annual integrated report (IR) discloses all of the following components identified in the i-ACGR.	
a. Corporate Objectives	COMPLIANT	IR (page 93) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	

b. Financial performance indicators	COMPLIANT	IR (page 114) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
c. Non-financial performance indicators	COMPLIANT	IR (page 115) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
d. Dividend Policy	COMPLIANT	IR (page 99) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
e. Biographical details (at least age, academic qualifications, date of first appointment, relevant experience, and other directorships in listed companies) of all directors	COMPLIANT	IR (pp. 116-127) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
f. Attendance details of each director in all directors meetings held during the year	COMPLIANT	IR (page 89) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
g. Total remuneration of each member of the board of directors	COMPLIANT	IR (page 90) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
2. The Annual Report contains a statement confirming the company's full compliance with the Code of Corporate Governance and where there is non-compliance, identifies and explains reason for each such issue.	COMPLIANT	IR (pp. 85- 136) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
3. The Annual Report/Annual CG Report discloses that the board of directors conducted a review of the company's material controls (including operational, financial and compliance controls) and risk management systems.	COMPLIANT	IR (pp. 103-104, 138-139) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
4. The Annual Report/Annual CG Report contains a statement from the board of directors or Audit Committee commenting	COMPLIANT	IR (pp. 138-139) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	

on the adequacy of the company's internal controls/risk management systems.			
5. The company discloses in the Annual Report the key risks to which the company is materially exposed to (i.e. financial, operational including IT, environmental, social, economic).	COMPLIANT	IR (pp. 108-112) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
Principle 9: The company should establish standards for the appropriate selection of an external auditor, and exercise effective oversight of the same to strengthen the external auditor's independence and enhance audit quality.			
Recommendation 9.1			
1. Audit Committee has a robust process for approving and recommending the appointment, reappointment, removal, and fees of the external auditors.	COMPLIANT	As stated in its Charter, our Audit and RPT Committee, ensures that Globe Telecom has set appropriate policies and processes that strengthen the external/independent auditor's independence and improve audit quality. The Committee's role in and process for approving, recommending for appointment, re-appointment and/or removal, and fees of the company's external auditor are contained in its Charter. The implementation of which is manifested by our ASM wherein our shareholders approve, among others, the appointment, re-appointment, removal and fees of our external auditor. Charter of the Audit and RPT Committee (Section 3), pp. 9-11 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Audit-and-RPTs-Committee-Charter.pdf 2018 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/Results-of-2018-ASM-and-Organizational-Board-Meeting-SECReceived17Apr2018.pdf 2019 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2019/GLO-17C-ASM-2019-Results-and-Org-Meeting-Results-PSEReceived23Apr2019.pdf	

2. The appointment, reappointment, removal, and fees of the external auditor is recommended by the Audit Committee, approved by the Board and ratified by the shareholders.	COMPLIANT	Our shareholders approve, among others, the appointment, re-appointment, removal and fees of our external auditor. The ratification of the appointment and fees of the external auditor was recorded via our disclosure on results of the 2018 ASM and our voting results from the 2018 ASM. Both of which are posted on our website. The percentage of shareholders that ratified the appointment and fees of our external auditor for 2018 was 100%. 2018 ASM Voting Results https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/Voting-Results-ASM2018.pdf 2018 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/Results-of-2018-ASM-and-Organizational-Board-Meeting-SECReceived17Apr2018.pdf	
3. For removal of the external auditor, the reasons for removal or change are disclosed to the regulators and the public through the company website and required disclosures.	COMPLIANT	Globe Telecom's last change in external auditor was for the year 2015. Our MCG states that should the external auditor be removed or changed, disclosure on the reasons for his removal shall be clearly contained in the said disclosure. Minutes of the 2015 ASM (Item 7), page 11 https://www.globe.com.ph/about-us/corporate-governance.htmlcontent/dam/multi-microsites/docs/2016/GLOBE-Minutes-of-the-Annual-Meeting-of-Stockholders-7April2015.pdf MCG (Article III, Section 9.1(b)), page 34 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf	
Supplement to Recommendation 9.1			
1. Company has a policy of rotating the lead audit partner every five years.	COMPLIANT	Our MCG states that the lead partner of our external auditor is rotated at least once every 5 years, or earlier and even consider whether a rotation of the audit firm itself is necessary.	

		MCG (Article III, Section 9.1(b)), page 34 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf	
Recommendation 9.2			
1. Audit Committee Charter includes the Audit Committee's responsibility on: i. assessing the integrity and independence of external auditors; ii. exercising effective oversight to review and monitor the external auditor's independence and objectivity; and iii. exercising effective oversight to review and monitor the effectiveness of the audit process, taking into consideration relevant Philippine professional and regulatory requirements.	COMPLIANT	At the minimum, our Audit and RPT Committee Charter includes the Committee's responsibilities in relation to the duties and deliverables of our external/independent auditor as well as monitoring of the same to ensure the auditor's continuous suitability and effectiveness. Charter of the Audit and RPT Committee (Section 3), pp. 9-11 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Audit-and-RPTs-Committee-Charter.pdf IR (pp. 102-103) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
2. Audit Committee Charter contains the Committee's responsibility on reviewing and monitoring the external auditor's suitability and effectiveness on an annual basis.	COMPLIANT		
Supplement to Recommendations 9.2			
1. Audit Committee ensures that the external auditor is credible, competent and has the ability to understand complex related party transactions, its counterparties, and valuations of such transactions.	COMPLIANT	Our Audit and RPT Committee Charter includes the Committee's responsibility in relation to ensuring that our external/independent auditor is credible, competent and has the ability to understand complex RPTs, its counterparties, and valuations of such transactions. Charter of the Audit and RPT Committee (Sections 3, 4.7, 7), pp. 9-11, 13, 16-17 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Audit-and-RPTs-Committee-Charter.pdf	

2. Audit Committee ensures that the external auditor has adequate quality control procedures.	COMPLIANT	Our Audit and RPT Committee Charter also includes the Committee's responsibilities in maintaining adequate quality control or checks and balances procedures. Charter of the Audit and RPT Committee (Section 7), pp. 16-17 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Audit-and-RPTs-Committee-Charter.pdf	
Recommendation 9.3			
1. Company discloses the nature of non-audit services performed by its external auditor in the Annual Report to deal with the potential conflict of interest.	COMPLIANT	Our external/independent auditor was not engaged to perform non-audit services for 2018. Our Audit and RPT Committee Charter also states the responsibilities of the Committee in relation to the non-audit work performed by the external/independent auditor and its corresponding disclosure, if any. IR (pp. 104-105) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf DIS (page 25) https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/Voting-Results-ASM2018.pdf Charter of the Audit and RPT Committee (Section 7), pp. 16-17 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Audit-and-RPTs-Committee-Charter.pdf	
2. Audit Committee stays alert for any potential conflict of interest situations, given the guidelines or policies on non-audit services, which could be viewed as impairing the external auditor's objectivity.	COMPLIANT	Our Audit and RPT Committee Charter guides our Committee in ensuring the objectivity and independent judgment of our external/independent auditor. Charter of the Audit and RPT Committee (Item 2 in page 6; Sections 3.7, 7.3), pp. 6, 10, 17 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Audit-and-RPTs-Committee-Charter.pdf	
Supplement to Recommendation 9.3			

1. Fees paid for non-audit services do not outweigh the fees paid for audit services.	COMPLIANT	Our external/independent auditor was not engaged to perform non-audit services for 2017. Fees incurred in relation to the engagement of our external/independent auditor is disclosed in our IR. IR (page 105) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf DIS (pp. 25-26) https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/Voting-Results-ASM2018.pdf	
Additional Recommendation to Principle 9			
1. Company's external auditor is duly accredited by the SEC under Group A category.	COMPLIANT	In accordance with SEC rules and regulations, Globe Telecom engages only SEC-accredited external/independent auditors. Information on our external auditor for 2018, Navarro Amper &Co./Deloitte Philippines (NA/DP) are disclosed in our DIS, the results of our ASM, minutes of our ASM, and IR in addition to the details identified below: Audit/Engagement Partner for 2018: Mr. Oliver S. Bucao NA/DP Accreditation Number: 0001-FR-4 Date NA/DP was accredited: January 7, 2016 Expiry date of NA/DP accreditation: January 6, 2019 Name, address and contact number of NA/DP: Navarro Amper & Co.; 19th Floor Net Lima Plaza, 5th Avenue corner 26th Street, Bonifacio Global City, Taguig City; Contact number: 02 5819000 DIS (pp. 24-25) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf 2018 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/Results-of-2018-ASM-and-Organizational-Board-Meeting-SECReceived17Apr2018.pdf	

		IR (pp. 104-105) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
2. Company's external auditor agreed to be subjected to the SEC Oversight Assurance Review (SOAR) Inspection Program conducted by the SEC's Office of the General Accountant (OGA).	COMPLIANT	While SEC has not conducted SOAR inspection for NA/DP, NA/DP recognizes that it is subjected to the SEC SOAR inspection program and shall comply with relevant guidelines and requirements related thereto.	
Principle 10: The company should ensure that the material and reportable non-financial and sustainability issues are disclosed.			
Recommendation 10.1			
1. Board has a clear and focused policy on the disclosure of non-financial information, with emphasis on the management of economic, environmental, social and governance (EESG) issues of its business, which underpin sustainability.	COMPLIANT	Globe Telecom has policies and practices on disclosure of non-financial information through its sustainability reporting and follows the Global Reporting Index (GRI) framework in our Annual and Sustainability Report. We continued adopting the integrated reporting for our Integrated Report (IR). The reporting parameters and integrated approach of our IR are discussed in the Report. IR (pp. 8-9, 21) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
2. Company adopts a globally recognized standard/framework in reporting sustainability and non-financial issues.	COMPLIANT		
Principle 11: The company should maintain a comprehensive and cost-efficient communication channel for disseminating relevant information. This channel is crucial for informed decision-making by investors, stakeholders and other interested users.			
Recommendation 11.1			

1. Company has media and analysts' briefings as channels of communication to ensure the timely and accurate dissemination of public, material and relevant information to its shareholders and other investors.	COMPLIANT	Even as we offer multiple channels of communication for our stakeholders, Globe Telecom continues to explore ways to improve customer interactions. Among the channels of communication made available to our stakeholders, the Company has media and investors'/analysts' briefings. We also have:
		• Social Media Channels
		  ○ Facebook account
		  ○ Twitter account
		• Hotline
		• E-mail	

		• Calendar of Media and Investors'/Analysts' Briefing • Press Conferences • Annual and Quarterly reporting, etc., All of these are also made available through our website. IR (pp. 47-48, 99) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf Company website – Contact Us https://www.globe.com.ph/contact-us.html Investor Relations/Media Calendar of Activities https://www.globe.com.ph/about-us/investor-relations.html → 2018 Calendar https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/IR-Calendar/2018/GLO-IR-Calendar-2018.pdf SEC/PSE Disclosures – Annual, Quarterly and Periodic Reports and Briefings/Presentations https://www.globe.com.ph/about-us/investor-relations/sec-pse-disclosures.html	
Supplemental to Principle 11			
1. Company has a website disclosing up-to-date information on the following:		Among the reports and corporate disclosures/ documents on our website for our stakeholders, we also maintain our website with up-to-date information on the following:	
a. Financial statements/reports (latest quarterly)	COMPLIANT	Audited Financial Statements https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2018/Annual/audited-financial-statements/GLO-Conso-FS-2018-SECReceived28Feb2019-final.pdf Quarterly Reports (under Quarterly Report 2018 table) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2018/Quarterly/Quarterly-Results-Press-Release/GLO-Quarterly-Results-Press-Release-4Q18.pdf	

b. Materials provided in briefings to analysts and media	COMPLIANT	Analysts' Briefings (under Analysts Briefing Materials 2018 table) https://www.globe.com.ph/about-us/investor-relations/sec-pse-disclosures.html Media Briefings (under Analysts Briefing Materials 2018 table) https://www.globe.com.ph/about-us/investor-relations/sec-pse-disclosures.html ASM Presentations https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2019/Annual/asm-presentation/GLO-2019-ASM-Presentation.pdf	
c. Downloadable annual report	COMPLIANT	Downloadable annual reports (SEC Form 17-A) by year https://www.globe.com.ph/about-us/investor-relations/sec-pse-disclosures.html Downloadable annual Integrated Report https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
d. Notice of ASM and/or SSM	COMPLIANT	ASM Materials and Information by year https://www.globe.com.ph/about-us/corporate-governance/annual-stockholders-meetings.html Notice of 2018 ASM https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/Notice-and-Agenda-of-2018-ASM-SECReceived06Dec2017.pdf → Amended Notice of 2018 ASM https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/Notice-and-Agenda-of-2018-ASM-Revised-SECReceived28Feb2018.pdf	
e. Minutes of ASM and/or SSM	COMPLIANT	ASM Meeting Materials and Information by year https://www.globe.com.ph/about-us/corporate-governance/annual-stockholders-meetings.html Minutes of 2018 ASM	

		https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/minutes-asm-2018-signed.pdf	
f. Company's Articles of Incorporation and By-Laws	COMPLIANT	Articles of Incorporation https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/articles-of-incorporation/Articles-of-Incorporation.pdf By-Laws https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/by-laws/By-Laws.pdf	
Additional Recommendation to Principle 11			
1. Company complies with SEC-prescribed website template.	COMPLIANT	In accordance with the SEC-prescribed website template, Globe maintains its company website updated with relevant disclosures, corporate documents and reports for all stakeholders. Our website contains dedicated sections for these that include, but not limited to: Corporate Governance page https://www.globe.com.ph/about-us/corporate-governance.html Investor Relations page https://www.globe.com.ph/about-us/investor-relations.html Sustainability page https://www.globe.com.ph/about-us/sustainability.html	
Internal Control System and Risk Management Framework			
Principle 12: To ensure the integrity, transparency and proper governance in the conduct of its affairs, the company should have a strong and effective internal control system and enterprise risk management framework.			
Recommendation 12.1			
1. Company has an adequate and effective internal control system in the conduct of its business.	COMPLIANT	At the Board level, our Audit and RPT Committee exists to, among its many responsibilities, ensure internal audit functions and internal control systems are in place and working effectively. Our Internal Audit (IA) Group supports the Board, at the Management level, in its internal control functions and responsibilities. Our IA group has its own charter, which is also posted on our website.	

		As discussed in our IR, on an annual basis, our President and CEO, CFO, and CAE provide a written certification to the Audit and RPT Committee confirming the reliability of financial statements for the year; full compliance with financial, legal and regulatory requirements and reporting; attestation on Globe Telecom's sound internal controls and compliance system. MCG (Article V, Section 12.2), pp. 37-38 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Charter of the Internal Audit Group https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Internal-Audit-Charter.pdf IR (pp. 103, 138-139) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
2. Company has an adequate and effective enterprise risk management framework in the conduct of its business.	COMPLIANT	The ISO 31000 framework for Risk Management is used as the basis for Globe Telecom's risk management (RM) process. With guidance provided by the Board, our Management is fully responsible for decision-making over the day-to-day affairs of Globe including the design, development and implementation of the RM strategies, policies and systems intended to address the identified risks. Our RM procedures and processes, key risks of the company and how we are managing these are discussed in our IR. On an annual basis, our President and CEO, CFO and CRO, and CAE provide a written certification to the Audit and RPT Committee confirming the reliability of financial statements for the year; full compliance with financial, legal and regulatory requirements and reporting; attestation on Globe Telecom's sound internal controls and compliance system. Our IR also contains the report of the Audit and RPT Committee to the Board where the Committee identified that, among other matters discussed	

		and reviewed, the Committee also underscored the need to review and update the existing financial model. Charter of the Management-level Risk Management Committee https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/enterprise-risk-management/Risk-Management-Committee-Charter.pdf Charter of the Board-level Risk Oversight Committee (BROC) https://www.globe.com.ph/about-us/corporate-governance/board-of-directors/committees.html MCG (Article V, Section 12.3), pp. 38-39 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf IR (pp. 103, 138-139, 143) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
Supplement to Recommendations 12.1			
1. Company has a formal comprehensive enterprise-wide compliance program covering compliance with laws and relevant regulations that is annually reviewed. The program includes appropriate training and awareness initiatives to facilitate understanding, acceptance and compliance with the said issuances.	COMPLIANT	Globe Telecom's Chief Compliance Officer exists to, among other duties and responsibilities, ensure enterprise-wide compliance with the relevant laws, internal company policies, rules and regulations, and all governance issuances of pertinent regulatory agencies that include, among others, the PSE and SEC. Other regulators we are subjected to include the National Telecommunications Commission (NTC) and Department of Labor (DOLE). For other regulators such as these, our office of the Chief Compliance Officer collaborates with other internal units responsible such as the Legal team and HR. The Chief Compliance Officer annually reviews the relevance of the MCG and other company policies in accordance with rules and regulations as well as the compliance of the company with its MCG and the standards espoused in it that is aligned with the SEC Code of CG. Our Chief Compliance Officer issues an annual	

		Certification of Compliance with the MCG, countersigned by our President and CEO, which is posted on our website and included in our IR. Our CoC further supplements our enterprise-wide compliance program. Our CoC, with our MCG and other policies, are provided to employees during on-boarding programs. On an annual basis, our Chief Human Resource Officer, issues a Certification of Compliance with the CoC, which is posted on our website and included in our IR. MCG (Article II, Section1.5), page 5 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Company website – Certificate of Compliance with MCG https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/reports-and-certifications/2018/Certificate-of-Compliance-with-MCG-2018.pdf IR (pp. 84-95, 136-137) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf Charter of the Board of Directors (Article II, Section 1.1), page 14 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Board-of-Directors-Charter.pdf Code of Conduct and Ethics https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/company-policies/Code-of-Conduct.pdf	
Optional: Recommendation 12.1			

1. Company has a governance process on IT issues including disruption, cyber security, and disaster recovery, to ensure that all key risks are identified, managed and reported to the board.	COMPLIANT	Given the breadth, scope and complexity of Globe's business, critical risk areas are being managed by specific and specialized teams. This includes among others, Information Security and Data Privacy (ISDP), Business Continuity, Safety, Workplace and Environment, Property Risk, Fraud Risk, Etc. Focused mitigation plans and programs are being undertaken by each team to ensure focus on addressing and proactively managing the potential impact of such risks. We embarked on a Cybersecurity Transformation journey back in 2014 and completed the three-year program in December 2017. We expanded the size of our cybersecurity team, adopted world-class technologies and standards, and worked with the best global partners in the space. These measures will ensure that customers are protected against cybersecurity threats, Globe launched the Advanced Security Operations Center (ASOC) to deliver services such as customer service platform management, threat detection, threat hunting, and incident response for both the Globe network and the network of its customers. We also continue implementation and of best practices on business resiliency to assure customers and stakeholders of our preparedness in handling business disruptions in the event of a major incident or disaster. Business continuity protocols include, among others, activating network contingencies that reduce the impact of service disruptions to customers. Our Business Continuity Management (BCM) policy also serves as our guide to ensure that key risks are identified, managed and reported to our Management and Board. To mitigate the risk of business disruption and improve the capabilities to prepare for, respond to and recover immediately from any incident that could compromise the safety of its people and disrupt services, Globe continues to expand and elaborate on the details of its enterprise-wide BCM program. We are continuously enhancing our incident and crisis management plans and capabilities and have incorporated disaster risk reduction and response objectives in our business continuity planning.	

		The Information Systems Group (ISG) is the information technology (IT) arm of Globe, committed to provide reliable and sustainable IT solutions for partners and stakeholders. As Globe accelerates its digital transformation programs, ISG is well positioned to further its role in ensuring that cybersecurity and managed security services are effectively in place. We recognize that the risk of data leakage is high with the level of empowerment granted to in-house and outsourced employees handling sales and after sales support transactions to enable the efficient discharge of their functions. Management also appointed a Chief Information Security Officer (CISO) and Data Protection Officer (DPO) to strengthen management of risks relating to the confidentiality and integrity of customer information while ensuring compliance with Data Privacy act of 2012 (Republic Act 10173). Our IR also discusses our policy on data privacy and intellectual property rights, our identified IT issues, how we handle these and other activities we have in relation to these. IR (pp. 32-35, 97, 111-112) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
Recommendation 12.2			
1. Company has in place an independent internal audit function that provides an independent and objective assurance, and consulting services designed to add value and improve the company's operations.	COMPLIANT	The establishment of an IA function is a fundamental part of Globe Telecom's CG practices and policy. Our IA group is led by our CAE, Ms. Carmina J. Herbosa. Our IA group has their own Charter that is posted on our website. Internal Audit Charter https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Internal-Audit-Charter.pdf	
Recommendation 12.3			
1. Company has a qualified Chief Audit Executive (CAE) appointed by the Board.	COMPLIANT	Ms. Carmina J. Herbosa, our CAE, was appointed by our Board of Directors at their organizational meeting held immediately after our 2018 and 2019 ASM on 17 April 2018 and 23 April 2019, respectively. Ms. Herbosa's profile is included in our DIS and 17-A.	
2. CAE oversees and is responsible for the internal audit activity of the organization,	COMPLIANT		

including that portion that is outsourced to a third party service provider.		Our IA group has their own Charter that is posted on our website. The Charter also outlines the functions and responsibilities of the CAE including, but not limited to, the CAE's responsibility over the IA activities of the company. 2018 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/Results-of-2018-ASM-and-Organizational-Board-Meeting-SECReceived17Apr2018.pdf 2019 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2019/GLO-17C-ASM-2019-Results-and-Org-Meeting-Results-PSEReceived23Apr2019.pdf IR (pp. 103-104) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf DIS (page 44) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf SEC Form 17-A for 2018 (page 108) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2018/Annual/annual-report-17a/GLO-17A-2018.pdf Internal Audit Charter (Parts A, G-J, L), pp. 1, 3-4, 9-10 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Internal-Audit-Charter.pdf	
3. In case of a fully outsourced internal audit activity, a qualified independent executive or senior management	NOT APPLICABLE	Our IA group is in-house as abovementioned.	

personnel is assigned the responsibility for managing the fully outsourced internal audit activity.			
Recommendation 12.4			
1. Company has a separate risk management function to identify, assess and monitor key risk exposures.	COMPLIANT	The Board of Directors oversees and conducts an annual review of our material controls, covering operational, financial and compliance areas and overall RM systems. The overall responsibility for our RM oversight rests with the Board. With guidance provided by the Board, our Management is fully responsible for decision-making over the day-to-day affairs of Globe including the design, development and implementation of the RM strategies, policies and systems intended to address the identified risks. A Management-Level Risk Management Committee (MLRMC), chaired by the Chief Risk Officer (CRO), was established to assist the Board. The Enterprise Risk Management Services Division (ERMSD), headed by a Risk Management Program Officer, supports the CRO in undertaking her role. Our RM function is discussed in our IR and guided by our Charter of the RM Committee. Both of which are posted on our company website. IR (pp. 107-108) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf Charter of the Management-level Risk Management Committee https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/enterprise-risk-management/Risk-Management-Committee-Charter.pdf Charter of the BROC https://www.globe.com.ph/about-us/corporate-governance/board-of-directors/committees.html	
Supplement to Recommendation 12.4			

1. Company seeks external technical support in risk management when such competence is not available internally.	COMPLIANT	Globe Telecom is currently able to find internal talent sufficient to manage ERM. While we have not engaged external professionals or firms to support our Board in RM, our Charter of the Board states that we may seek external technical support from third party experts to aid our Board in the performance of its duties and responsibilities including in the field of RM. Charter of the Board of Directors (Article III, Section 1.1), pp. 19-20 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf	
Recommendation 12.5			
1. In managing the company's Risk Management System, the company has a Chief Risk Officer (CRO), who is the ultimate champion of Enterprise Risk Management (ERM).	COMPLIANT	Our CRO is Ms. Rosemarie Maniego-Eala. She was appointed by our Board of Directors at their organizational meeting held immediately after our 2018 ASM on 17 April 2018 and our 2019 ASM on 23 April 2019, respectively. Ms. Maniego-Eala's profile is included in our DIS and 17-A. As CRO, CFO and Treasurer, Ms. Maniego-Eala has adequate authority, stature, resources and support from Management and our Board to fulfill his/her responsibilities. Our Charter of the Risk Committee also outlines the functions and responsibilities of our CRO in the company. The same is discussed in our IR. 2018 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/Results-of-2018-ASM-and-Organizational-Board-Meeting-SECReceived17Apr2018.pdf 2019 Results of the ASM and Board Organizational Meeting https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2019/GLO-17C-ASM-2019-Results-and-Org-Meeting-Results-PSEReceived23Apr2019.pdf DIS (page 44) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-	
2. CRO has adequate authority, stature, resources and support to fulfill his/her responsibilities.	COMPLIANT		

		Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf SEC Form 17-A for 2018 (page 108) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2018/Annual/annual-report-17a/GLO-17A-2018.pdf Charter of the Management-level Risk Management Committee https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/enterprise-risk-management/Risk-Management-Committee-Charter.pdf Charter of the BROC https://www.globe.com.ph/about-us/corporate-governance/board-of-directors/committees.html	
Additional Recommendation to Principle 12			
1. Company's Chief Executive Officer and Chief Audit Executive attest in writing, at least annually, that a sound internal audit, control and compliance system is in place and working effectively.	COMPLIANT	As discussed in our IR, on an annual basis, our President and CEO, CFO and CFO, and CAE provide a written certification to the Audit and RPT Committee confirming the reliability of financial statements for the year; full compliance with financial, legal and regulatory requirements and reporting; attestation on Globe Telecom's sound internal controls and compliance system. IR (pp. 103) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
Cultivating a Synergic Relationship with Shareholders			
Principle 13: The company should treat all shareholders fairly and equitably, and also recognize, protect and facilitate the exercise of their rights.			
Recommendation 13.1			
1. Board ensures that basic shareholder rights are disclosed in the Manual on Corporate Governance.	COMPLIANT	Our MCG discloses basic shareholder rights that include, among others, voting right, pre-emptive right, right of inspection, right of information, right to dividends and appraisal right. The same are posted on our company website. MCG (Article VI, Section 13.1-13.2; Article VII, Section 14), pp. 42-44, 45-47	
2. Board ensures that basic shareholder rights are disclosed on the company's website.	COMPLIANT		

		https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Company website – Company Policies, Shareholders' Rights https://www.globe.com.ph/about-us/corporate-governance/company-policies.html Company website – Stakeholders https://www.globe.com.ph/about-us/corporate-governance/stakeholders.html	
Supplement to Recommendation 13.1			
1. Company's common share has one vote for one share.	COMPLIANT	In accordance with our Articles of Incorporation (AOI), Globe Telecom common shares have one vote per share. Our AOI also identifies information about each class of share we have. In accordance with our MCG and By-Laws, Globe Telecom treats shareholders of the same class equally with respect to voting rights, subscription rights and transfer rights, including minority shareholders. Likewise, these documents state our effective, secure and efficient voting system. Our voting procedures are also reiterated in our DIS, which in part state: "…stockholders may opt for manual or electronic voting…every stockholder will be entitled to cumulate his votes. Each outstanding share of stock entitles the registered stockholder to one vote." Our DIS for our most recent ASM held on 23 April 2019 updated this with an additional manner of voting through remote communication or *in absentia*. Articles of Incorporation (Article VII), pp. 6-9 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/articles-of-incorporation/Articles-of-Incorporation.pdf MCG (Article II, Section 2.6), pp. 11-13 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-	
2. Board ensures that all shareholders of the same class are treated equally with respect to voting rights, subscription rights and transfer rights.	COMPLIANT		
3. Board has an effective, secure, and efficient voting system.	COMPLIANT		

		corporate-governance/GLO-MCG-SECReceived30May2017.pdf By-Laws (Article I, Section 5), page 2 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/by-laws/By-Laws.pdf DIS (pp. 9, 12) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf	
4. Board has an effective shareholder voting mechanisms such as supermajority or "majority of minority" requirements to protect minority shareholders against actions of controlling shareholders.	COMPLIANT	Our Board has an effective shareholder voting mechanism. This is included in our By-Laws, DIS, Notice to stockholders of the ASM and implemented during ASM. Validation of votes is done by an external validator selected for the purpose. Results of the voting during ASMs are likewise uploaded on our company website. Further, rights of minority shareholders are protected at all times, especially from abusive actions by, or in the interest of controlling shareholders. We ensure that its policies and processes cater to the best interest of all its shareholders, including minority shareholders, and other stakeholders. All transactions including material RPTs that require shareholders' approval are submitted to all shareholders, including minority shareholders, for approval. As part of shareholders' rights, including minority shareholders, shareholders can propose nominees to the Board for election at the ASM as reflected in our DIS on the nomination of the directors to the Board by a minority shareholder. By-Laws (Article I, Section 5), page 2 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/by-laws/By-Laws.pdf DIS (pp. 9, 12-13) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-	

		Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf Notice and Agenda of the 2018 ASM (page 2) https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/Notice-and-Agenda-of-2018-ASM-SECReceived06Dec2017.pdf Minutes of the 2018 ASM https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/minutes-asm-2018-signed.pdf	
5. Board allows shareholders to call a special shareholders' meeting and submit a proposal for consideration or agenda item at the AGM or special meeting.	COMPLIANT	While there was no instance of a special shareholders' meeting in 2018, our MCG provides for the rights of shareholders to call for a meeting and propose items in the agenda for the stockholders' meeting. In 2018, this was evident in the nomination of directors for the ensuing year by a minority shareholder. This is in our DIS. MCG (Article II, Section 2.6; Article VI, Section 13.1 (d)), pp. 11-13, 43 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf DIS (page 13) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf	
6. Board clearly articulates and enforces policies with respect to treatment of minority shareholders.	COMPLIANT	Our MCG provides for policies with respect to treatment of our shareholders, including our minority shareholders. MCG (Article VI; Article VII, Section 14.2), pp. 42-46 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Company website – Company Policies, Shareholders' Rights	

		https://www.globe.com.ph/about-us/corporate-governance/company-policies.html Company website – Stakeholders https://www.globe.com.ph/about-us/corporate-governance/stakeholders.html	
7. Company has a transparent and specific dividend policy.	COMPLIANT	Our dividend policy and our declared dividends are in our IR and company website. In accordance with company policy and as much as practicable, Globe Telecom observes a 30-day period for the payment of dividends to shareholders from the declaration date of such dividends. MCG (Article VI, Section 13.1 (e)), pp. 43-44 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Company website – Dividend Policy https://www.globe.com.ph/about-us/investor-relations/stock-information/dividend-policy.html Company website – Historical Dividends https://www.globe.com.ph/about-us/investor-relations/stock-information/dividend-policy.html Company website – Company Policies https://www.globe.com.ph/about-us/corporate-governance/company-policies.html	
Optional: Recommendation 13.1			
1. Company appoints an independent party to count and/or validate the votes at the Annual Shareholders' Meeting.	COMPLIANT	SyCip Gorres Velayo & Co. (SGV & Co.) was appointed as the independent validator of votes for the 2018 ASM held on 17 April 2018. Voting Results at the 2018 ASM https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/Voting-Results-ASM2018.pdf	
Recommendation 13.2			
1. Board encourages active shareholder participation by sending the Notice of Annual and Special Shareholders'	COMPLIANT	Notice and agenda of the 2018 ASM were sent out on December 6, 2017 for the meeting on 17 April 2018 which is approximately 133 days before the meeting. Meanwhile,	

Meeting with sufficient and relevant information at least 28 days before the meeting.		the complete materials for the meeting were sent out to shareholders on March 12, 2018 which is approximately 35 days before the meeting. Changes for approval of shareholders during the ASM included the election of directors and election of independent auditors and fixing of their remuneration. Notice of 2018 ASM https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/Notice-and-Agenda-of-2018-ASM-SECReceived06Dec2017.pdf DIS (page 8) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf	
Supplemental to Recommendation 13.2			
1. Company's Notice of Annual Stockholders' Meeting contains the following information:		Apart from the initial notice and agenda of the ASM, which is usually disclosed after the last meeting of our Board for each year, we also send out complete materials to shareholders for ASMs. Notice of 2018 ASM https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/Notice-and-Agenda-of-2018-ASM-SECReceived06Dec2017.pdf Our complete shareholder materials for ASMs (ASM kit) include our DIS for the completed year including, but not limited to, the profiles of our directors or nominee directors, auditors seeking appointment/re-appointment, and proxy documents. DIS https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf	

a. The profiles of directors (i.e., age, academic qualifications, date of first appointment, experience, and directorships in other listed companies)	COMPLIANT	Complete ASM kit for 2018 ASM with DIS (pp. 30-35) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf	
b. Auditors seeking appointment/re-appointment	COMPLIANT	Complete ASM kit for 2018 ASM with DIS (pp. 24-25) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf	
c. Proxy documents	COMPLIANT	Complete ASM kit for 2018 ASM with DIS (page 4) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf	
Optional: Recommendation 13.2			
1. Company provides rationale for the agenda items for the annual stockholders meeting.	COMPLIANT	The rationale or explanation of the agenda items for the 2018 ASM is included when we first declare or disclose the date of our ASM. Notice and Agenda of the 2018 ASM https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/Notice-and-Agenda-of-2018-ASM-SECReceived06Dec2017.pdf	
Recommendation 13.3			
1. Board encourages active shareholder participation by making the result of the votes taken during the most recent Annual or Special Shareholders' Meeting publicly available the next working day.	COMPLIANT	Results from our 2018 ASM was submitted to pertinent regulators and posted on the website on the afternoon immediately after the meeting on 17 April 2018. https://www.globe.com.ph/about-us/corporate-governance.htmlcontent/dam/multi-microsites/docs/investor-relations/2018/SEC-Form-17-C-ASM2018-SECReceived17Apr2018.pdf The voting results from the ASM was posted on the company website on the same day. https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/Voting-Results-ASM2018.pdf	

		Minutes of the meeting containing the questions and answers during the ASM were posted on our website on 19 April 2019, 2 days after our ASM. https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/minutes-asm-2018-signed.pdf	
2. Minutes of the Annual and Special Shareholders' Meetings were available on the company website within five business days from the end of the meeting.	COMPLIANT	Minutes of the meeting were posted on our website on 19 April 2018, 2 days after our ASM on 17 April 2018. Our minutes include the resolutions approved by our shareholders during the meeting, and questions and answers given during the meeting. https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/minutes-asm-2018-signed.pdf	
Supplement to Recommendation 13.3			
1. Board ensures the attendance of the external auditor and other relevant individuals to answer shareholders questions during the ASM and SSM.	COMPLIANT	Our external/independent auditor was present during the 2018 ASM along with our Board of Directors. Among other key officers present were our President and CEO, Corporate Secretary, CAE, CRO, CTIO and CSO, General Counsel and Chief Compliance Officer were also present at the said ASM. https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/minutes-asm-2018-signed.pdf	
Recommendation 13.4			
1. Board makes available, at the option of a shareholder, an alternative dispute mechanism to resolve intra-corporate disputes in an amicable and effective manner.	COMPLIANT	To resolve intra-corporate disputes, a shareholder, at his option, may file for mediation under the Alternative Dispute Resolution Act of 2004. If the intra-corporate dispute is not resolved by mediation, the parties may bring the matter to arbitration in accordance with the Philippine Arbitration Law, then in force. While there was no such instance where our policy on alternative dispute resolution was required, our policy is included in our MCG and Charter of the Board. MCG (Article VI, Section 13.3), page 44 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Board-of-Directors-Charter.pdf Charter of the Board of Directors (Article II, Section 1.12), page 19	
2. The alternative dispute mechanism is included in the company's Manual on Corporate Governance.	COMPLIANT		

		https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Board-of-Directors-Charter.pdf	
Recommendation 13.5			
1. Board establishes an Investor Relations Office (IRO) to ensure constant engagement with its shareholders.	COMPLIANT	Our Investor Relations Office exists to ensure constant engagement with our shareholders. The contact details of our IRO, including name, number and email, are on our company website, particularly at the bottom of the investor relations page as seen below. Our IRO was also present during our ASMs, including the 2018 and 2019 ASMs. Jose Mari Fajardo (Director, Investor Relations) Telephone: (02) 7974307 E-mail: ir@globe.com.ph Investor Relations – Investor Relations Contact http://investor-relations.globe.com.ph/	
2. IRO is present at every shareholder's meeting.	COMPLIANT		
Supplemental Recommendations to Principle 13			
1. Board avoids anti-takeover measures or similar devices that may entrench ineffective management or the existing controlling shareholder group	COMPLIANT	Globe Telecom does not have anti-takeover measures or similar devices that may entrench ineffective management. In accordance with our internal policies, we treat all shareholders and stakeholders equally and have specific corporate acts submitted for their approval at every stockholders' meeting. Articles of Incorporation on Voting Rights (pp. 6-9) https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/articles-of-incorporation/Articles-of-Incorporation.pdf MCG (Article IV – Article VII), pp. 35-54 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Notice and Agenda of the 2018 ASM (pp. 2-4) https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/Notice-and-Agenda-of-2018-ASM-SECReceived06Dec2017.pdf	

2. Company has at least thirty percent (30%) public float to increase liquidity in the market.	NON-COMPLIANT		Our public float is at 21.67%. This is well over the requirement under the law and the SEC and PSE regulations, which state that companies must keep 20% public float at all times. Globe Telecom also complies with the SEC and PSE quarterly reportorial requirement of our public ownership. Public Ownership Report for 1Q2019 https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2019/Quarterly/Public-Ownership/GLO-POR-1Q19.pdf Public Ownership Report for 1Q2018 https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2018/Quarterly/Public-Ownership/GLO-POR-1Q18.pdf Public Ownership Report for 2Q2018 https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2018/Quarterly/Public-Ownership/GLO-POR-2Q18.pdf Public Ownership Report for 3Q2018 https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2018/Quarterly/Public-Ownership/GLO-POR-3Q18.pdf Public Ownership Report for 4Q2018 https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-

			Disclosures/2018/Quarterly/Public-Ownership/GLO-POR-4Q18.pdf
Optional: Principle 13			
1. Company has policies and practices to encourage shareholders to engage with the company beyond the Annual Stockholders' Meeting	COMPLIANT	Our MCG provides for our Board's and Management's roles in communication and information with our shareholders and other stakeholders. The Charter of the Board also promotes equitable treatment of shareholders. MCG (Article VII), pp. 45-54 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Charter of the Board (Article I, Section 1.10), page 18 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Board-of-Directors-Charter.pdf In addition to the ASM, we extend different venues for our shareholders and various stakeholders to communicate effectively with us through the conduct of analysts' briefings, ad-hoc briefings, investor conferences, media briefings, one-on-one or small group meetings, and investor days that are organized by our Investor Relations Department and/or Corporate Communications Group or in partnership with our shareholders, broker or other partner institutions. Other than keeping the company website up-to-date, these venues provide alternative means for us to discuss our quarterly financial results, announcements, material disclosures and other relevant information with stakeholders. Company website – 2018 Investor Relations Calendar https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/IR-Calendar/2018/GLO-IR-Calendar-2018.pdf Quarterly Results Press Release by year https://www.globe.com.ph/about-us/investor-relations/sec-pse-disclosures.html Briefing/Presentations for Analysts/Investors by year	

		https://www.globe.com.ph/about-us/investor-relations/sec-pse-disclosures.html ASM Presentation by year https://www.globe.com.ph/about-us/investor-relations/sec-pse-disclosures.html Briefing/Presentations for Media by year https://www.globe.com.ph/about-us/investor-relations/sec-pse-disclosures.html Furthermore, in our IR, we have been further streamlining communication efforts and opening up several new customer touch points, enabling them to interact with us at their convenience. Among other enhancements, we utilized email, live chat, SMS, website, and social media channels (e.g., Facebook, Twitter, Instagram) to provide our customers with real-time information and quicker responses to concerns. A conference call facility is set-up during analysts' briefings and meetings to enable wider participation among shareholders and other stakeholders. We also participate in both local and international investor conferences, which host various shareholders and other stakeholders. Details and information on these conferences are published on our corporate website. We have sustained this convenient and accessible line of communication through our IR Program in the last financial year and will continue to enhance this in the succeeding years. IR (page 99) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
2. Company practices secure electronic voting in absentia at the Annual Shareholders' Meeting.	COMPLIANT	Globe Telecom shareholders may vote by proxy and are provided two options when voting during ASMs – manual or electronic voting. Beginning 2019, Globe further enabled convenient and digital touchpoints with its stockholders through making available an additional electronic channel for voting through remote communication or *in absentia*. All stockholders are informed of these options prior to ASMs through the 'Notice and Agenda of ASMs' and the	

		complete ASM kits sent to shareholders. For the 2019 ASM, Globe released an additional corporate disclosure for the electronic voting via remote communication or *in absentia*. The policy and procedures are reiterated by our Corporate Secretary during ASMs. Notice and Agenda of the 2018 ASM (page 2) https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/Notice-and-Agenda-of-2018-ASM-SECReceived06Dec2017.pdf Notice and Agenda of the 2019 ASM https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2019/GLO-17C-ASM-Notice-and-Agenda-2019.pdf → Amended for electronic voting *in absentia* https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2019/StampReceived_Globe_Disclosure_11March2019.pdf 2018 Minutes of the ASM (Item 2), pp. 2-3 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-stockholders-meeting/2018/minutes-asm-2018-signed.pdf	
Duties to Stakeholders			
Principle 14: The rights of stakeholders established by law, by contractual relations and through voluntary commitments must be respected. Where stakeholders' rights and/or interests are at stake, stakeholders should have the opportunity to obtain prompt effective redress for the violation of their rights.			
Recommendation 14.1			
1. Board identifies the company's various stakeholders and promotes cooperation between them and the company in creating wealth, growth and sustainability.	COMPLIANT	The MCG contains the policies of Globe Telecom for our identified stakeholders. These policies are also posted on our website. Our sustainability policy is also a reflection of our policy protecting the interests of our stakeholders. MCG (Article VII), pp. 45-54 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-	

		corporate-governance/GLO-MCG-SECReceived30May2017.pdf Charter of the Board (Article II, Sections 1.10 – 1.11), pp. 18-19 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Board-of-Directors-Charter.pdf Company website – Company Policies https://www.globe.com.ph/about-us/corporate-governance/company-policies.html In addition, Globe Telecom recognizes that taking care of and cooperating with our stakeholders are essential to how the business becomes the network of choice among our subscribers and stakeholders. We continue to see value in identifying, sustaining programs for and developing collaborations with our stakeholders. As discussed in our IR, our stakeholders based on their level of influence on our environmental, social, and governance performance, have been grouped into eight categories after a full stakeholder engagement exercise in 2015. Stakeholder engagement takes many forms and it can be formal and informal. Rather than having one-off consultations around specific topics, we prefer to take an integrated approach towards stakeholder engagement. This means we have ongoing dialogue about our role in society, our products and services, our business performance, and other issues. The instruments we use to conduct this dialogue include: • Customer hotlines and other self-service channels and/or touchpoints, satisfaction and engagement surveys, field visits, and product launches for customers; • Engagement surveys, independent development plan discussion, performance evaluation, planning, meeting, and/or kick-offs, strategy alignment for our employees (Ka-Globe);	

		• Program launches, forums, conferences and meetings, email correspondences, and focus group discussions with media; • Conference, meetings, and/or electronic dialogue, compliance with laws and regulations, and partnerships for government; • Meetings and SMS text message alerts for disaster respondents; • Board and committee meetings for parent companies and affiliates; • Meetings and alignment, operations review and audit for service vendor partners; • Vendor engagement survey and town halls for frontline vendor partners. IR (page 9) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
Recommendation 14.2			
1. Board establishes clear policies and programs to provide a mechanism on the fair treatment and protection of stakeholders.	COMPLIANT	The MCG contains the policies of Globe Telecom for our identified stakeholders. These policies are also posted on our website. In addition, programs for our stakeholders are discussed in our IR. MCG (Article VII), pp. 45-54 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Charter of the Board (Article II, Sections 1.10 – 1.11), pp. 18-19 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Board-of-Directors-Charter.pdf IR (pp. 48-52, 94-97) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
Recommendation 14.3			

1. Board adopts a transparent framework and process that allow stakeholders to communicate with the company and to obtain redress for the violation of their rights.	COMPLIANT	In addition to our ASM and media channels available for our stakeholders, we also ensure a feedback mechanism is available to them. In addition, our whistleblowing policy exists to support protection for our stakeholders. Among other channels, whistleblowing reports or concerns may be sent via gt_whistleblower@globe.com.ph or the Hotline through 09178189934. Our whistleblowing policy is also discussed in our IR, and our website. MCG (Article II, Section 6.2; Article VII, Section 14.3), pp. 30, 46-47 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf IR for 2018 (pp. 94-97) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf Company website – Company Policies, Whistleblowing https://www.globe.com.ph/about-us/corporate-governance/company-policies.html Company website – Contact Us, Whistleblowing https://www.globe.com.ph/contact-us.html	
Supplement to Recommendation 14.3			
1. Company establishes an alternative dispute resolution system so that conflicts and differences with key stakeholders is settled in a fair and expeditious manner.	COMPLIANT	To resolve intra-corporate disputes, a shareholder, at his option, may file for mediation under the Alternative Dispute Resolution Act of 2004. If the intra-corporate dispute is not resolved by mediation, the parties may bring the matter to arbitration in accordance with the Philippine Arbitration Law, then in force. While there was no such instance where our policy on alternative dispute resolution was required, our policy is included in our MCG and Charter of the Board. MCG (Article VI, Section 13.3), page 44 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Board-of-Directors-Charter.pdf	

		Charter of the Board of Directors (Article II, Section 1.12), page 19 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Board-of-Directors-Charter.pdf	
Additional Recommendations to Principle 14			
1. Company does not seek any exemption from the application of a law, rule or regulation especially when it refers to a corporate governance issue. If an exemption was sought, the company discloses the reason for such action, as well as presents the specific steps being taken to finally comply with the applicable law, rule or regulation.	COMPLIANT	Globe Telecom did not seek exemption from the application of any law, rule or regulation relative to corporate governance issues in 2018. As a listed company on the PSE and PDEx (Philippine Dealing & Exchange Corp.), we comply with all reportorial requirements, rules and applicable laws as well as regulations of relevant regulatory agencies. These are reflected throughout our company, our reports and pertinent pages in our company website. Certification of Compliance with MCG https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/reports-and-certifications/2018/Certificate-of-Compliance-with-MCG-2018.pdf IR for 2018 (pp. 85, 136) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
2. Company respects intellectual property rights.	COMPLIANT	No cases involving violation of intellectual property rights were filed against Globe Telecom in 2018. Our policy on data privacy and intellectual property rights and respecting confidential information are also embedded in our MCG and company website. The same is stated in our IR. MCG (Article VII, Section 15.7), pp. 52-53 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Company website – Company Policies https://www.globe.com.ph/about-us/corporate-governance/company-policies.html	

		IR for 2018 (page 97) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
Optional: Principle 14			
1. Company discloses its policies and practices that address customers' welfare	COMPLIANT	Our policy on customers' welfare and supplier/contractor selection procedures are on our website and discussed in our IR. Company website – Policy in relation to Health, Safety and Welfare of Customers and Suppliers and Vendor Audit https://www.globe.com.ph/about-us/corporate-governance/company-policies.html IR for 2018 (pp. 94-97) http://annual-report.globe.com.ph/content/dam/multi-microsites/docs/annual-report/2017/2017-Globe-Integrated-Report.pdf	
2. Company discloses its policies and practices that address supplier/contractor selection procedures	COMPLIANT		
Principle 15: A mechanism for employee participation should be developed to create a symbiotic environment, realize the company's goals and participate in its corporate governance processes.			
Recommendation 15.1			
1. Board establishes policies, programs and procedures that encourage employees to actively participate in the realization of the company's goals and in its governance.	COMPLIANT	In addition to our company policies such as the whistleblowing policy, our MCG specifies that our Board shall be instrumental in establishing policies, programs and procedures that encourage our employees to actively participate in the realization of Globe Telecom's goals and in its governance. We continue to empower our people at all levels in our organization, enabling them to innovate within areas of responsibility, collaborate extensively, and be consistently guided by a shared purpose and set of corporate values. MCG (Article VII, Section 15.1), page 47 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf IR for 2018 (pp. 72-80)	

		https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
Supplement to Recommendation 15.1			
1. Company has a reward/compensation policy that accounts for the performance of the company beyond short-term financial measures.	COMPLIANT	Globe Telecom has a Long Term Incentive Plan created to replace the Employee Stock Option last awarded in 2009. The new plan's primary objective is to drive long term performance in a highly competitive market by aligning management interest with the shareholders' interest. This is discussed in our IR alongside other remuneration components as well as in our DIS and Notes to Consolidated Financial Statements. IR for 2018 (pp. 93-94) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf IR for 2017 (pp. 87-89) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/Annual-and-Sustainability-Reports/GLO-2017-Integrated-Report.pdf DIS (pp. 23, and Note 18 of the AFS) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/information-statement-20is/GLO-20IS-2017.pdf AFS for 2017 (Note 18 of the AFS) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2017/Annual/audited-financial-statements/GLO-Audited-FS-2017.pdf	
2. Company has policies and practices on health, safety and welfare of its employees.	COMPLIANT	Our policies and practices on health, safety and welfare of employees as well as training and development for them are discussed in our IR. We organized and conducted our first CG Training for various directors and officers of our subsidiaries on September 14. ROAM, Inc. led the fruitful discussions that included, among others, an introduction to CG, the SEC Code of CG for publicly-listed companies, recently passed law on the ease of doing business and	
3. Company has policies and practices on training and development of its employees.	COMPLIANT		

		efficient delivery of government services, CG trends for the year, and CG cases. The same are posted on our website. IR for 2018 (pp. 72-80) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf Company website – Policy and Data in relation to Health, Safety and Welfare of Employees including Trainings https://www.globe.com.ph/about-us/corporate-governance/company-policies.html	
Recommendation 15.2			
1. Board sets the tone and makes a stand against corrupt practices by adopting an anti-corruption policy and program in its Code of Conduct.	COMPLIANT	Our anti-corruption policy is in our MCG, posted on our website, in our IR and CoC. MCG (Article VII, Section 15.6), page 52 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf IR for 2018 (pp. 95-96) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf Company website – Company Policies https://www.globe.com.ph/about-us/corporate-governance/company-policies.html CoC (pp. 25-26, 49, 70-71, 79-80) https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/company-policies/Code-of-Conduct.pdf	
2. Board disseminates the policy and program to employees across the organization through trainings to embed them in the company's culture.	COMPLIANT	We conduct periodic lectures and seminars on anti-corruption initiatives through our Human Resources Group to all employees. The same is also included in the on-boarding orientation program attended by new employees. Further, our Board, through Management, remind employees through our internal communications channel	

		to fill out gift disclosures especially during national festivities. The form is then submitted to employees' respective group heads who will decide whether the gift shall be returned or kept by the employee or be surrendered to Human Resources Group for possible use during company events. We conduct periodic lectures and seminars on anti-corruption initiatives through our Human Resources Group to all employees. The same is also included in the on-boarding orientation program attended by new employees. IR for 2018 (pp. 95-96) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
Supplement to Recommendation 15.2			
1. Company has clear and stringent policies and procedures on curbing and penalizing employee involvement in offering, paying and receiving bribes.	COMPLIANT	Globe employees maintain the highest standards of honesty and professional conduct. Seeking undue financial and material advantage from transactions with Globe is a breach of trust between the employee and our company. Policies and procedures on curbing and penalizing company or employee involvement in offering, paying and receiving of bribes are in our CoC, which covers all employees including our Board of Directors, Management and consultants. Our CoC states in part that any employee who directly or indirectly demands, requests, solicits, receives or accepts any commission, share or consideration, monetary or otherwise, for him/herself, or for another, in connection with any contract or transaction entered into by Globe Telecom, or in connection with the performance of his/her duties, or because of his/her position, shall suffer the penalty of dismissal. Our anti-corruption policy is also contained in our website, and IR. CoC (pp. 9, 49) https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/company-policies/Code-of-Conduct.pdf IR for 2018 (page 95) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	

		Company website – Company Policies https://www.globe.com.ph/about-us/corporate-governance/company-policies.html	
Recommendation 15.3			
1. Board establishes a suitable framework for whistleblowing that allows employees to freely communicate their concerns about illegal or unethical practices, without fear of retaliation	COMPLIANT	Our whistle-blowing policy is in our MCG and discussed in our CoC and IR. Our whistle-blowing policy ensures that whistle-blowers' reports are kept confidential together with their identities, they are protected from retaliation and that points of contact for whistleblowers are available and easy to access. The process in this policy involves the Human Resource Group, Internal Audit, and Legal Services, among others. Through various channels which, among others, include a hotline (0917-8189934), an email address (gt_whistleblower@globe.com.ph) as well as specific group under the HR Labor Relations department (HRLR), we provide a mechanism that allows employees and even third parties to report suspected violations of company policies by employees, officers, directors, and partners, on unethical and corrupt practices, misappropriation of company assets, fraudulent reporting practices, and other violations of our Code of Conduct, MCG, and Securities Regulation Code. As part of our policy, whistleblowing-related disclosures made in good faith are protected by keeping the information confidential. The identity and source of the information are likewise protected to the extent required by law. MCG (Article VII, Section 14.2) https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf CoC (pp. 37-39, 85-93) https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/company-policies/Code-of-Conduct.pdf IR for 2018 (pp. 34-35, 96)	
2. Board establishes a suitable framework for whistleblowing that allows employees to have direct access to an independent member of the Board or a unit created to handle whistleblowing concerns.	COMPLIANT		
3. Board supervises and ensures the enforcement of the whistleblowing framework.	COMPLIANT		

		https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf	
Principle 16: The company should be socially responsible in all its dealings with the communities where it operates. It should ensure that its interactions serve its environment and stakeholders in a positive and progressive manner that is fully supportive of its comprehensive and balanced development.			
Recommendation 16.1			
1. Company recognizes and places importance on the interdependence between business and society, and promotes a mutually beneficial relationship that allows the company to grow its business, while contributing to the advancement of the society where it operates.	COMPLIANT	Our community involvement and environment-related programs are discussed in our IR, which is posted on our website. Similarly, Globe Telecom's *Bridging Communities* program has a dedicated page on our website together with the Sustainability page that both feature our community, social and environment-related programs. IR for 2018 (pp. 27-32, 48-52) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf MCG (Article VII, Section 16.1), pp. 53-54 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Company website – Sustainability https://www.globe.com.ph/about-us/sustainability.html	
Optional: Principle 16			
1. Company ensures that its value chain is environmentally friendly or is consistent with promoting sustainable development	COMPLIANT	In accordance with our internal policy, Globe Telecom shall not only comply with existing regulations, but also voluntarily employ value chain processes that take into consideration economic, environmental, social and governance issues and concerns in accordance with our own sustainability framework and adopted global reporting standard. We recognize that the interdependence between business and society exists such that we must give back to society while growing our	
2. Company exerts effort to interact positively with the communities in which it operates	COMPLIANT		

		business. This, in turn, creates a layer of sustainability for our value in the community and success for our business. Our environmentally friendly value chain, sustainability policy/framework and programs are discussed in our IR and posted on our website. MCG (Article VII, Section 16.1), pp. 53-54 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf Charter of the Board of Directors (Article II, Section 1.11), page 19 https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/board-of-directors/Board-of-Directors-Charter.pdf IR for 2018 (pp. 21, 36-37, 83) https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf IR for 2017 (pp. 29-32, 94) http://annual-report.globe.com.ph/content/dam/multi-microsites/docs/annual-report/2017/2017-Globe-Integrated-Report.pdf Company website – Sustainability https://www.globe.com.ph/about-us/sustainability.html	

Pursuant to the requirement of the Securities and Exchange Commission, this Integrated Annual Corporate Governance Report (i-ACGR) is signed on behalf of the registrant by the undersigned, thereunto duly authorized, in the City of Taguig on MAY 0 3 2019 2019.

SIGNATURES

[redacted]

JAIME AUGUSTO ZOBEL DE AYALA
Chairman of the Board

[redacted]

ERNEST L. CU
President and CEO

[redacted]

REX MA. A. MENDOZA
Lead Independent Director

[redacted]

SAW PHAIK HWA
Independent Director

[redacted]

CIRILO P. NOEL
Independent Director

[redacted]

MARISALVE CIOCSON-CO
Chief Compliance Officer

[redacted]

SOLOMON M. HERMOSURA
Corporate Secretary

SUBSCRIBED AND SWORN to before me this MAY 0 3 2019 day of May 2019, affiant(s) exhibiting to me their Passport Numbers as follows:

NAME/NO.	DATE OF ISSUE	PLACE OF ISSUE
JAIME AUGUSTO ZOBEL DE AYALA ERNEST L. CU REX MA. A. MENDOZA SAW PHAIK HWA CIRILO P. NOEL MARISALVE CIOCSON-CO SOLOMON M. HERMOSURA	[redacted]	

Doc No. 420;
Page No. 79;
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