



LEVEL 1 continued...

D. Disclosure and Transparency

Scorecard Item		Guiding Reference	Answer (Yes/No)	GLO Remarks
D.1	Transparent Ownership Structure			
D.1.1	Does the information on shareholdings reveal the identity of beneficial owners, holding 5% shareholding or more?	<p>OECD Principle V: (A) Disclosure should include, but not limited to, material information on:</p> <p>(3) Major share ownership and voting rights, including group structures, intra-group relations, ownership date, and beneficial ownership.</p> <p>ICGN 7.6 Disclosure of ownership</p> <p>...the disclosure should include a description of the relationship of the company to other companies in the corporate group, data on major shareholders and any other information necessary for a proper understanding of the company's relationship with its public shareholders.</p>	YES	<p>Information on shareholdings reveal the identity of beneficial owners, holding 5% shareholding or more. We disclose information on company shareholdings of beneficial owners, holding 5% shareholding or more through our Top 20 Shareholders report and or Top 100 Shareholders Report submitted to the SEC and the PSE and made available through our company website. Likewise, these information are disclosed through our financial reports, Definitive Information Statement (SEC Form 20-IS), Annual Corporate Governance Report (ACGR), Annual Report (SEC Form 17-A) and Annual and Sustainability Report (ASR):</p> <p>Top 20 Shareholders (Company website) http://investor-relations.globe.com.ph/stock-info/top-20-shareholders.html</p> <p>Top 100 Shareholders (Company website) http://investor-relations.globe.com.ph/sec-filings/top-shareholders.html</p> <p>GLO 2016 Information Statement, p. 11 (Section B, Item 1(e)(i)) http://investor-relations.globe.com.ph/sec-filings/information-statement.html</p> <p>GLO ACGR Y2016, p. 65 (Part I(1)(a))</p>



			<p>http://corporate-governance.globe.com.ph/content/dam/multi-microsites/docs/2017/GLO%20ACGR%202016%20Submission_SECReceived26May2017.pdf</p> <p>GLO 2016 SEC Form 17-A, PDF pp. 141-142 (Part III, Item 9) http://investor-relations.globe.com.ph/sec-filings/annual-report-17a.html</p> <p>2016 Annual and Sustainability Report, pp. 125-126 http://investor-relations.globe.com.ph/annual-sustainability-reports.html</p>
D.1.2	Does the company disclose the direct and indirect (deemed) shareholdings of major and/or substantial shareholders?		<p>YES</p> <p>Globe discloses direct and indirect shareholdings of major and/or substantial shareholders through the company website, financial reports, SEC Form 20-IS, SEC Form 17-A and ACGR. A quarterly report on the Top 100 shareholders is likewise submitted to the SEC and PSE, which is made available through our company website together with the report on Top 20 shareholders:</p> <p>Shareholding Structure (Company website) http://corporate-governance.globe.com.ph/shareholding-structure.html</p> <p>GLO 2016 Information Statement, p. 11 (Section B, Item 1(e)(i)) http://investor-relations.globe.com.ph/sec-filings/information-statement.html</p> <p>GLO 2016 SEC Form 17-A, PDF pp. 141-142 (Part III, Item 9) http://investor-relations.globe.com.ph/sec-filings/annual-report-17a.html</p>



			<p><u>GLO ACGR Y2016, p. 65 (Part I(1)(a))</u> http://corporate-governance.globe.com.ph/content/dam/multi-microsites/docs/2017/GLO%20ACGR%202016%20Submission_SECReceived26May2017.pdf</p> <p><u>Top 100 Shareholders (Company website)</u> http://investor-relations.globe.com.ph/sec-filings/top-shareholders.html</p> <p><u>Top 20 Shareholders (Company website)</u> http://investor-relations.globe.com.ph/stock-info/top-20-shareholders.html</p>
D.1.3	Does the company disclose the direct and indirect (deemed) shareholdings of directors (commissioners)?		<p>YES</p> <p>Globe discloses the direct and indirect shareholdings of the directors through our financial reports, SEC Form 20-IS, SEC Form 17-A, ACGR and ASR.</p> <p>Periodic reports on changes of beneficial ownership of our directors (SEC Form 23-A/B) are likewise filed with the SEC and the PSE according to regulatory requirements and our company policy on dealings in securities by directors. As of 31 December 2016, none of our directors owns 2% or more of the outstanding capital stock of the Company:</p> <p><u>GLO 2016 Information Statement, p. 11 (Section B, Item 1(e)(ii))</u> http://investor-relations.globe.com.ph/sec-filings/information-statement.html</p> <p><u>GLO 2016 SEC Form 17-A, PDF p. 450 (Part III, Item 9(B))</u> http://investor-relations.globe.com.ph/sec-filings/annual-report-17a.html</p>



			<p>GLO ACGR Y2016, p. 11 (Part A(1)(e)) http://corporate-governance.globe.com.ph/content/dam/multi-microsites/docs/2017/GLO%20ACGR%202016%20Submission_SECReceived26May2017.pdf</p> <p>2016 Annual and Sustainability Report, pp. 70-71 http://investor-relations.globe.com.ph/annual-sustainability-reports.html</p> <p>Statements of Beneficial Ownership (Company website) http://investor-relations.globe.com.ph/sec-filings/statement-of-beneficial-ownership/2017.html</p> <p>Top 100 Shareholders (Company website) http://investor-relations.globe.com.ph/sec-filings/top-shareholders.html</p> <p>Top 20 Shareholders (Company website) http://investor-relations.globe.com.ph/stock-info/top-20-shareholders.html</p>
D.1.4	Does the company disclose the direct and indirect (deemed) shareholdings of senior management?		<p>YES</p> <p>Globe discloses the direct and indirect shareholdings of senior management through its financial reports, SEC Form 20-IS, SEC Form 17-A, ACGR and ASR.</p> <p>Periodic reports on changes of beneficial ownership of our key officers or senior management (SEC Form 23-A/B) are likewise filed with the SEC and the PSE according to regulatory requirements and our company policy on dealings in securities by directors. As of 31 December 2016, none of the members of our senior management owns 2% or more of the outstanding capital stock of the Company:</p>



			<p>GLO 2016 Information Statement, p. 11 (Section B, Item 1(e)(ii)) http://investor-relations.globe.com.ph/sec-filings/information-statement.html</p> <p>GLO 2016 SEC Form 17-A, PDF p. 450 (Part III, Item 9(B)) http://investor-relations.globe.com.ph/sec-filings/annual-report-17a.html</p> <p>GLO ACGR Y2016, p. 11 (Part A(1)(e)) http://corporate-governance.globe.com.ph/content/dam/multi-microsites/docs/2017/GLO%20ACGR%202016%20Submission_SECReceived26May2017.pdf</p> <p>2016 Annual and Sustainability Report, pp. 70-71 http://investor-relations.globe.com.ph/annual-sustainability-reports.html</p> <p>Statements of Beneficial Ownership (Company website) http://investor-relations.globe.com.ph/sec-filings/statement-of-beneficial-ownership/2017.html</p> <p>Top 100 Shareholders (Company website) http://investor-relations.globe.com.ph/sec-filings/top-shareholders.html</p> <p>Top 20 Shareholders (Company website) http://investor-relations.globe.com.ph/stock-info/top-20-shareholders.html</p>
D.1.5	Does the company disclose details of the parent/holding company, subsidiaries, associates,	YES	Globe discloses details of the parent/holding company, subsidiaries, associates, joint ventures and special purpose enterprises/vehicles through the financial reports. An illustration of the Globe group, including subsidiaries,

Note: Where applicable and for convenient reading, PDF pages (pp.) will be used as reference.



	<p>joint ventures and special purpose enterprises/vehicles (SPEs)/(SPVs)?</p>		<p>associates, joint ventures and special purpose enterprise/vehicles, is disclosed in our company website.</p> <p>Globe transactions or dealings with such related parties are also disclosed through our financial reports and any material transaction shall be covered by our Policy on RPTs. All of these are also publicly-available through our company website:</p> <p><u>Conglomerate Map (Company website)</u> http://corporate-governance.globe.com.ph/conglomerate-map.html</p> <p><u>2016 Annual and Sustainability Report, pp. 6, 156, 205-206, 247-253</u> http://investor-relations.globe.com.ph/annual-sustainability-reports.html</p> <p><u>GLO 2016 Information Statement, pp. 13-26 (Section B, Item 2)</u> http://investor-relations.globe.com.ph/sec-filings/information-statement.html</p> <p><u>GLO 2016 SEC Form 17-A, PDF pp. 31, 165-170</u> http://investor-relations.globe.com.ph/sec-filings/annual-report-17a.html</p> <p><u>GLO ACGR Y2016, p. 80 (Part I(1)(a))</u> http://corporate-governance.globe.com.ph/content/dam/multi-microsites/docs/2017/GLO%20ACGR%202016%20Submission_SECRceived26May2017.pdf</p>
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Scorecard Item		Guiding Reference	Answer (Yes/No)	GLO Remarks
D.2	Quality of Annual Report			
Does the company's annual report disclose the following items:				
D.2.1	Corporate Objectives	<p>OECD Principle V (A): (1) The financial and operating results of the company; (2) Company objectives, including ethics, environment, and other public policy commitments; (3) Major share ownership and voting rights, including group structures, intra-group relations, ownership data, beneficial ownership; (4) Remuneration policy for members of the board and key executives, including their qualifications, the selection process, other company directorships and whether they are regarded as independent by the board; (6) Foreseeable risk factors, including risk management system; (7) Issues regarding employees and other stakeholders; (8) Governance structure and policies, in particular, the content of any corporate governance code or policy and the process by which it is implemented.</p> <p>OECD Principle V (E): Channels for disseminating information should provide for equal, timely and cost-efficient access to relevant information by users.</p>	YES	<p>To create a wonderful world for our people, business, and nation, we will also continue to collaborate with partners in developing e-governance and develop infrastructure to optimize the quality of our services and enhance the coverage of our network. Our announcement last March reiterated our goal to deploy fiber optic cables in 20,000 barangays in the Philippines to provide faster and more reliable internet access in about 2 million homes nationwide. This infrastructure build is expected to take 5 years and will extend network coverage to more areas that currently require stable connectivity services. We look forward to launching new product and service in 2017, building more cell sites and establishing fiber-optic technology that supports this thrust towards enabling public wireless connectivity as well as quality connection in more Filipino households.</p> <p>Our corporate objectives are not only included in our ASR, but also posted with our vision, mission and values on our company website:</p> <p>2016 Annual and Sustainability Report, p. 109 http://investor-relations.globe.com.ph/annual-sustainability-reports.html</p> <p>Corporate Objectives (Company website) http://corporate-governance.globe.com.ph/vision-mission-values.html</p>
D.2.2	Financial Performance indicators		YES	<p>We are committed to efficiently managing our resources and enhancing shareholder value. We regularly review our performance against our operating and financial plans and</p>



		<p>ICGN 2.4 Composition and structure of the board ICGN 2.4.1 Skills and experience ICGN 2.4.3 Independence</p> <p>ICGN 5.0 Remuneration ICGN 5.4 Transparency</p> <p>UK Corporate Governance Code (2010) A.1.2 – the number of meetings of the board and those committees and individual attendance by directors.</p> <p>CLSA ACGA (2010) CG Watch 2010 – Appendix 2 (I) CG rules and practices (19) Disclose the exact remuneration of individual directors.</p>	<p>strategies, and use key performance indicators to monitor our progress. Except for net income, our financial performance indicators are not measurements in accordance with Philippine Financial Reporting Standards (PFRS) and should not be considered as an alternative to net income or any other measure of performance which are in accordance with PFRS.</p> <p>Globe’s identified financial performance indicators include aspects in mobile business, fixed line and broadband business. Discussions of which are disclosed in our ASR, mentioned in the ACGR and the Annual Report:</p> <p><u>2016 Annual and Sustainability Report, p. 124</u> <u>http://investor-relations.globe.com.ph/annual-sustainability-reports.html</u></p> <p><u>GLO ACGR Y2016, p. 81 (Part I(2))</u> <u>http://corporate-governance.globe.com.ph/content/dam/multi-microsites/docs/2017/GLO%20ACGR%202016%20Submission%20SECReceived26May2017.pdf</u></p>
D.2.3	Non-Financial Performance indicators		<p>YES</p> <p>We also use a non-financial performance indicator to measure the success of the business and emphasize our commitment to sustainability. These include: (1) employee engagement score; (2) customer satisfaction; (3) environmental and social impacts; among others.</p> <p>Globe’s identified non-financial performance indicators are discussed in several parts of our ASR, mentioned in the ACGR and the Annual Report:</p> <p><u>2016 Annual and Sustainability Report, pp. 22, 38-68, 84, 124</u> <u>http://investor-relations.globe.com.ph/annual-sustainability-reports.html</u></p>



				<p>GLO ACGR Y2016, p. 81 (Part I(2)) http://corporate-governance.globe.com.ph/content/dam/multi-microsites/docs/2017/GLO%20ACGR%202016%20Submission%20SECReceived26May2017.pdf</p>
D.2.4	Dividend Policy		YES	<p>Our dividend policy is in our MCG and company website. The same is also included in our ASR, ACGR and sec form 17-A:</p> <p>2016 Annual and Sustainability Report, pp. 124 http://investor-relations.globe.com.ph/annual-sustainability-reports.html</p> <p>GLO ACGR Y2016, p. 81 (Part I(2)) http://corporate-governance.globe.com.ph/content/dam/multi-microsites/docs/2017/GLO%20ACGR%202016%20Submission%20SECReceived26May2017.pdf</p> <p>GLO 2016 SEC Form 17-A, PDF pp. 77, 143, 245 (Part IV, Item 11) http://investor-relations.globe.com.ph/sec-filings/annual-report-17a.html</p> <p>Divide Policy (Company website) http://corporate-governance.globe.com.ph/company-policies.html</p>
D.2.5	Biographical details (at least age, academic qualifications, date of first appointment, relevant experience, and any other directorships of listed companies) of all directors/commissioners		YES	<p>Our directors' biographical details are included in our ASR, SEC Form 17-A, SEC Form 20-IS and posted on our website:</p> <p>2016 Annual and Sustainability Report, pp. 129-139 http://investor-relations.globe.com.ph/annual-sustainability-reports.html</p> <p>GLO 2016 SEC Form 17-A, p. 122-126 http://investor-relations.globe.com.ph/sec-filings/annual-report-17a.html</p>

Note: Where applicable and for convenient reading, PDF pages (pp.) will be used as reference.



				<p>GLO 2016 Information Statement, pp. 34-38 (Annex "A") http://investor-relations.globe.com.ph/sec-filings/information-statement.html</p> <p>Board of Directors (Company website) http://corporate-governance.globe.com.ph/board-of-directors.html</p>
D.2.6	Attendance details of each director/commissioner in all directors/commissioners meetings held during the year		YES	<p>The attendance details of each director in all Board meetings held during the year is disclosed in our ASR, ACGR and posted on our company website. We also submit the annual summary of attendance of our directors to the SEC and PSE:</p> <p>2016 Annual and Sustainability Report, p. 104 http://investor-relations.globe.com.ph/annual-sustainability-reports.html</p> <p>GLO ACGR Y2016, p. 33 (Part C(2)) http://corporate-governance.globe.com.ph/content/dam/multi-microsites/docs/2017/GLO%20ACGR%202016%20Submission%20SECReceived26May2017.pdf</p> <p>Board Meetings (Company website) http://corporate-governance.globe.com.ph/board-of-directors/meetings.html</p> <p>GLO Submission of Attendance of Directors for Y2016 http://edge.pse.com.ph/openDiscViewer.do?edge_no=e58216db36272fa33318251c9257320d#sthash.Am0VMKOC.dpbs</p>
D.2.7	Total remuneration of each member of the board of directors/commissioners	<p>"OECD Principle V (A): (1) The financial and operating results of the company; (2) Company objectives, including ethics, environment, and other public policy</p>	YES	<p>The total remuneration of each member of our Board of Directors is disclosed in our ASR, SEC Form 17-A and posted on our company website:</p> <p>2016 Annual and Sustainability Report, p. 102</p>

Note: Where applicable and for convenient reading, PDF pages (pp.) will be used as reference.



		<p>commitments; (3) Major share ownership and voting rights, including group structures, intra-group relations, ownership data, beneficial ownership; (4) Remuneration policy for members of the board and key executives, including their qualifications, the selection process, other company directorships and whether they are regarded as independent by the board; (6) Foreseeable risk factors, including risk management system; (7) Issues regarding employees and other stakeholders; (8) Governance structure and policies, in particular, the content of any corporate governance code or policy and the process by which it is implemented.</p> <p>OECD Principle V (E): Channels for disseminating information should provide for equal, timely and cost-efficient access to relevant information by users.</p> <p>ICGN 2.4 Composition and structure of the board ICGN 2.4.1 Skills and experience ICGN 2.4.3 Independence</p> <p>ICGN 5.0 Remuneration ICGN 5.4 Transparency</p> <p>UK Corporate Governance Code (2010)</p>	<p>http://investor-relations.globe.com.ph/annual-sustainability-reports.html</p> <p>GLO 2016 SEC Form 17-A, p. 130 http://investor-relations.globe.com.ph/sec-filings/annual-report-17a.html</p> <p>Board Remuneration (Company website) http://corporate-governance.globe.com.ph/board-of-directors/remuneration.html</p>
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		<p>A.1.2 – the number of meetings of the board and those committees and individual attendance by directors.</p> <p>CLSA ACGA (2010) CG Watch 2010 – Appendix 2 (I) CG rules and practices (19) Disclose the exact remuneration of individual directors.</p>		
Corporate Governance Confirmation Statement				
D.2.8	<p>Does the Annual Report contain a statement confirming the company’s full compliance with the code of corporate governance and where there is non-compliance, identify and explain reasons for each issue?</p>	<p>OECD PRINCIPLE V (A) (8)</p> <p>UK CODE (JUNE 2010): Listing Rules 9.8.6 R (for UK incorporated companies) and 9.8.7 R (for overseas incorporated companies) state that in the case of a company that has a Premium listing of equity shares, the following items must be included in its Annual Report and accounts: a statement of how the listed company has applied the Main Principles set out in the UK CG Code, in a manner that would enable shareholders to evaluate how the principles have been applied; a statement as to whether the listed company has complied throughout the accounting period with all relevant provisions set out in the UK CG Code; or not complied throughout the accounting period with all relevant provisions set out in the UK CG Code, and if so, setting out: (i) those provisions, if any, it has not complied with; (ii) in the case of provisions whose requirements are of a continuing nature, the period within which, if any, it did not comply with some or all of those provisions; and (iii) the company’s reasons for non-compliance.</p> <p>ASX CODE: Under ASX Listing Rule 4.10.3, companies are</p>	<p>YES</p>	<p>An annual Certification of Compliance is issued and signed by our Compliance Officer and countersigned by our President and CEO, which is included in our ASR, ACGR and posted on our company website:</p> <p><u>2016 Annual and Sustainability Report, p. 159</u> http://investor-relations.globe.com.ph/annual-sustainability-reports.html</p> <p><u>GLO ACGR Y2016 (Annex “A”)</u> http://corporate-governance.globe.com.ph/content/dam/multi-microsites/docs/2017/Annexes%20to%20Globe%202016%20ACGR_A-C.pdf</p> <p><u>Reports & Certifications – Certification of Full Compliance (Company website)</u> http://corporate-governance.globe.com.ph/reports-and-certifications.html</p>



	required to provide a statement in their Annual Report disclosing the extent to which they have followed the Recommendations in the reporting period. Where companies have not followed all the Recommendations, they must identify the Recommendations that have not been followed and give reasons for not following them. Annual Reporting does not diminish the company's obligation to provide disclosure under ASX Listing Rule 3.1.	
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Scorecard Item		Guiding Reference	Answer (Yes/No)	GLO Remarks
D.3	Disclosure of Related Party Transactions (RPTs)			
D.3.1	Does the company disclose its policy covering the review and approval of material RPTs?	<p>OECD Principle V: Disclosure and Transparency (A) Disclosure should include, but not limited to, material information on: (5) Related party transactions</p> <p>ICGN 2.11.1 Related party transactions: The company should disclose details of all material related party transactions in its Annual Report.</p>	YES	<p>The review and approval of material RPTs are covered by our Policy on RPTs. The Policy also discusses the role of the Audit and RPT Committee in the review and approval of material RPTs. Our Policy on RPTs is disclosed in our MCG, company website, ACGR and ASR:</p> <p>GLO Manual of Corporate Governance, pp. 16-17 (Article II, Section 2.12) http://corporate-governance.globe.com.ph/content/dam/multi-microsites/docs/2017/GLOBE%20TELECOM,%20INC.%20MCG_SECReceived30May2017.pdf</p> <p>Policy on RPTs (Company website) http://corporate-governance.globe.com.ph/content/dam/multi-microsites/docs/2017/Globe%20Telecom,%20Inc.%20RPT%20Policy.pdf</p> <p>2016 Annual and Sustainability Report, pp. 120-121</p>

Note: Where applicable and for convenient reading, PDF pages (pp.) will be used as reference.



			<p>http://investor-relations.globe.com.ph/annual-sustainability-reports.html</p> <p>GLO ACGR Y2016, pp. 29-30 (Part B(4)(a)) http://corporate-governance.globe.com.ph/content/dam/multi-microsites/docs/2017/GLO%20ACGR%202016%20Submission_SECReceived26May2017.pdf</p>
D.3.2	Does the company disclose the name, relationship, nature and value for each material RPT?		<p>YES</p> <p>Our Policy on RPTs and RPT disclosure policy state that RPTs are disclosed in our financial statements, annual reports including, but not limited to, the ACGR, and other applicable filings in accordance with the relevant rules and issuance of the SEC and other applicable regulatory bodies. The disclosure includes, but is not limited to, the name of the related party, relationship with Globe for each RPT, the nature and value for each RPT. Such disclosure is also made publicly available, for the benefit of all shareholders and other stakeholders, through our website and such other media channels as applicable. Disclosure of RPTs is included in our ASR, ACGR, SEC Form 17-A and company website:</p> <p>2016 Annual and Sustainability Report, pp. 247-253 http://investor-relations.globe.com.ph/annual-sustainability-reports.html</p> <p>GLO ACGR Y2016 (Annex "C") http://corporate-governance.globe.com.ph/content/dam/multi-microsites/docs/2017/Annexes%20to%20Globe%202016%20ACGR_A-C.pdf</p> <p>GLO 2016 SEC Form 17-A, PDF pp. 235-241 http://investor-relations.globe.com.ph/sec-filings/annual-report-17a.html</p>



				<p>Policy on RPTs (Company website) http://corporate-governance.globe.com.ph/content/dam/multi-microsites/docs/2017/Globe%20Telecom,%20Inc.%20RPT%20Policy.pdf</p>
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Scorecard Item		Guiding Reference	Answer (Yes/No)	GLO Remarks
D.4	Directors and Commissioners dealings in shares of the company			
D.4.1	Does the company disclose trading in the company's shares by insiders?	<p>OECD Principle V (A): (3) Major share ownership and voting rights</p> <p>ICGN 3.5 Employee share dealing Companies should have clear rules regarding any trading by directors and employees in the company's own securities.</p> <p>ICGN 5.5 Share ownership: Every company should have and disclose a policy concerning ownership of shares of the company by senior managers and executive directors with the objective of aligning the interests of these key executives with those of shareholders.</p>	YES	<p>All Globe directors and key officers are required, within three (3) trading days upon change in ownership of securities, to submit a report on their trades to the Office of our Chief Compliance Officer for immediate submission/disclosure to the SEC and the PSE.</p> <p>Globe discloses the trading in the company's shares by insiders, its board of directors and key officers, through periodic reports (Statement of Beneficial Ownership, or SEC Form 23-A/B) submitted to the SEC and PSE. A summary of which is annually disclosed through our ASR, ACGR ad our website:</p> <p><u>GLO 2016 SEC Form 17-A, PDF pp. 141-142 (Part III, Item 9(B))</u> http://investor-relations.globe.com.ph/sec-filings/annual-report-17a.html</p> <p><u>2016 Annual and Sustainability Report, p. 126</u> http://investor-relations.globe.com.ph/annual-sustainability-reports.html</p>

Note: Where applicable and for convenient reading, PDF pages (pp.) will be used as reference.



				<p>GLO ACGR Y2016, pp. 11, 80 (Part A(1)(e), Part I(1)(a)) http://corporate-governance.globe.com.ph/content/dam/multi-microsites/docs/2017/GLO%20ACGR%202016%20Submission_SECReceived26May2017.pdf</p> <p>Statements of Beneficial Ownership (Company website) http://investor-relations.globe.com.ph/sec-filings/statement-of-beneficial-ownership/2017.html</p>
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Scorecard Item		Guiding Reference	Answer (Yes/No)	GLO Remarks
D.5	External Auditor and Auditor Report			
Where the same audit firm is engaged for both audit and non-audit services				
D.5.1	Are the audit and non-audit fees disclosed?	<p>OECD Principle V (C): An annual audit should be conducted by an independent, competent and qualified, auditor in order to provide an external and objective assurance to the board and shareholders that the financial statements fairly represent the financial position and performance of the company in all material respects.</p> <p>OECD Principle V (D): External auditors should be accountable to the shareholders and owe a duty to the company to exercise due professional care in the conduct of the audit.</p>	YES	<p>The audit and non-audit fees from services rendered by Navarro Amper & Co./Deloitte Philippines (NA/DP), Globe’s external/independent auditor for 2016, are disclosed in our ASR and ACGR:</p> <p>2016 Annual and Sustainability Report, pp. 115-116 http://investor-relations.globe.com.ph/annual-sustainability-reports.html</p> <p>GLO ACGR Y2016, p. 81 (Part I(3)) http://corporate-governance.globe.com.ph/content/dam/multi-microsites/docs/2017/GLO%20ACGR%202016%20Submission_SECReceived26May2017.pdf</p> <p>“External Audit” under Internal Control Mechanism (Company website) http://corporate-governance.globe.com.ph/internal-control-mechanism.html</p>



D.5.2	Does the non-audit fee exceed the audit fees?	<p>ICGN 6.5 Ethical standards (Audit) The auditors should observe high-quality auditing and ethical standards. To limit the possible risk of possible conflicts of interest, non-audit services and fees paid to auditors for non-audit services should be both approved in advance by the audit committee and disclosed in the Annual Report.</p>	NO	<p>Globe’s audit fees and non-audit fees in 2016 amounted to P16.96 million and P5.49 million, respectively. Non-audit fees in 2016 do not outweigh fees for audit and audit-related services.</p> <p><u>2016 Annual and Sustainability Report, pp. 115-116</u> http://investor-relations.globe.com.ph/annual-sustainability-reports.html</p> <p><u>GLO ACGR Y2016, p. 81 (Part I(3))</u> http://corporate-governance.globe.com.ph/content/dam/multi-microsites/docs/2017/GLO%20ACGR%202016%20Submission_SECReceived26May2017.pdf</p> <p><u>“External Audit” under Internal Control Mechanism (Company website)</u> http://corporate-governance.globe.com.ph/internal-control-mechanism.html</p>
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Scorecard Item		Guiding Reference	Answer (Yes/No)	GLO Remarks
D.6	Medium of Communications			
Does the company use the following modes of communication?				
D.6.1	Quarterly Reporting	<p>OECD Principle V (E): Channels for disseminating information should provide for equal, timely and cost-efficient access to relevant information by users.</p> <p>ICGN 7.1 Transparent and open communication</p>	YES	<p>Quarterly financial results are immediately disclosed after the approval by the Board to PSE and SEC. Quarterly and year-end financial statements and detailed management’s discussion and analysis are filed within 45 and 105 calendar days respectively from the end of the financial period, in compliance with SEC and PSE requisites.</p> <p>We have a dedicated page to quarterly reports on our company website:</p>



		<p>Every company should aspire to transparent and open communication about its aims, its challenges, its achievements and its failures.</p> <p>ICGN 7.2 Timely disclosure Companies should disclose relevant and material information concerning themselves on a timely basis, in particular meeting market guidelines where they exist, so as to allow investors to make informed decisions about the acquisition, ownership obligations and rights, and sales of shares.</p>	<p><u>2016 Annual and Sustainability Report, p. 123</u> <u>http://investor-relations.globe.com.ph/annual-sustainability-reports.html</u></p> <p><u>Quarterly Report (Company website)</u> <u>http://investor-relations.globe.com.ph/sec-filings/quarterly-report/2016.html</u></p>
D.6.2	Company Website		<p>YES</p> <p>Globe Telecom recognizes the importance of regular communication with its investors, customers, shareholders and all stakeholders, and is committed to high standards of disclosure, transparency, and accountability. Therefore, we continue to provide fair, accurate, and meaningful assessments of our financial performance and prospects through the annual report, quarterly financial reports, and analyst presentations. In addition, any material, market-sensitive information such as dividend declarations are also disclosed to the SEC and PSE, as well as released through various media including press releases and company website posting.</p> <p>Globe ensures that all shareholders and stakeholders are always provided with information about the company that are easily-accessible. As such, we maintain the relevance and validity of information on our company website. Among other company information, our website contains annual reports, periodic reports, company announcements, corporate documents, policies and manuals, ASRs, Quarterly Reports and press releases:</p> <p><u>About Globe (Company website)</u> <u>http://www.globe.com.ph/about-globe</u></p> <p><u>Corporate Governance (Company website)</u></p>



			<p>http://corporate-governance.globe.com.ph/</p> <p><u>Investor Relations (Company website)</u> http://investor-relations.globe.com.ph/</p> <p><u>News about Globe (Company website)</u> http://newsroom.globe.com.ph/</p> <p><u>Sustainability (Company website)</u> http://annual-report.globe.com.ph/2016.html</p>
D.6.3	Analyst's briefing		<p>YES</p> <p>Analysts' briefings, market announcements and investor conferences, among others, are organized by Globe's Investor Relations Department (IR) to provide a venue for effective communication with our investors, analysts and other stakeholders. Globe recognizes the importance of regular communication with all of our stakeholders, and is committed to high standards of disclosure, transparency, and accountability.</p> <p>Part of our company website is dedicated to a section that contains disclosures and reports, including presentations to analysts. The IR section of the website also contains our IR/Media Calendar of activities for the year, which includes, among others, analysts' briefings:</p> <p><u>2016 Annual and Sustainability Report, pp. 123-124</u> http://investor-relations.globe.com.ph/annual-sustainability-reports.html</p> <p><u>GLO ACGR Y2016, pp. 81, 101 (Part I(4), Part K(2))</u> http://corporate-governance.globe.com.ph/content/dam/multi-microsites/docs/2017/GLO%20ACGR%202016%20Submission_SECReceived26May2017.pdf</p>



			<p>Analysts' Briefings (Company website) http://investor-relations.globe.com.ph/sec-filings/analysts-briefings/2016.html</p> <p>"IR/Media Calendar" under Investor Relations (Company website) http://investor-relations.globe.com.ph/calendar.html</p>
D.6.4	Media briefings/press conferences		<p>YES</p> <p>Media briefings, analysts' briefings, market announcements and investor conferences, among others, are organized by Globe's Investor Relations Department (IR) to provide a venue for effective communication with our investors, analysts and other stakeholders. Globe recognizes the importance of regular communication with all of our stakeholders, and is committed to high standards of disclosure, transparency, and accountability.</p> <p>Part of our company website is dedicated to a section that contains disclosures and reports, including presentations during media briefings. The IR section of the website also contains our IR/Media Calendar of activities for the year, which includes, among others, media briefings:</p> <p>2016 Annual and Sustainability Report, pp. 123-124 http://investor-relations.globe.com.ph/annual-sustainability-reports.html</p> <p>GLO ACGR Y2016, pp. 81, 101 (Part I(4), Part K(2)) http://corporate-governance.globe.com.ph/content/dam/multi-microsites/docs/2017/GLO%20ACGR%202016%20Submission_SECReceived26May2017.pdf</p> <p>Media Briefings (Company website)</p>

Note: Where applicable and for convenient reading, PDF pages (pp.) will be used as reference.



			http://investor-relations.globe.com.ph/sec-filings/media-briefings.html "IR/Media Calendar" under Investor Relations (Company website) http://investor-relations.globe.com.ph/calendar.html
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Scorecard Item		Guiding Reference	Answer (Yes/No)	GLO Remarks
D.7	Timely filing/release of annual/financial reports			
D.7.1	Are the audited annual financial report/statement released within 120 days from the financial year end?	<p>OECD Principle V (C)</p> <p>OECD Principle V (E) OECD Principle V-(A).</p> <p>ICGN 7.2 Timely disclosure ICGN 7.3 Affirmation of financial statements The board of directors and the corporate officers of the company should affirm at least annually the accuracy of the company's financial statements or financial accounts.</p>	YES	<p>Globe is more than compliant with the SEC and PSE requisite on submission/release of the annual financial statement. Globe's audited financial statements for the year ended 31 December 2016 was released on February 28, 2017, which is fifty-nine days (59) days after the end of fiscal year.</p> <p>The same report is disclosed in our company website, and attached to our SEC Form 17-A and ASR:</p> <p>"2016 Audited Financial Statements" in Latest Releases of the Investor Relations page (Company website) http://investor-relations.globe.com.ph/</p> <p>"GLO 2016 Audited Financial Statements" under SEC/PSE Disclosures of the Investor Relations page (Company website) http://investor-relations.globe.com.ph/sec-filings/audited-financial-statements.html</p> <p>GLO 2016 SEC Form 17-A, PDF pp. 151-320</p>



			<p>http://investor-relations.globe.com.ph/sec-filings/annual-report-17a.html</p> <p>2016 Annual and Sustainability Report, pp. 160-332 http://investor-relations.globe.com.ph/annual-sustainability-reports.html</p> <p>GLO ACGR Y2016, p. 82 (Part I(5)) http://corporate-governance.globe.com.ph/content/dam/multi-microsites/docs/2017/GLO%20ACGR%202016%20Submission_SECReceived26May2017.pdf</p>
D.7.2	Is the annual report released within 120 days from the financial year end?		<p>YES</p> <p>Globe is more than compliant with the SEC and PSE requisite on submission/release of the annual report. Globe’s Annual Report for the year ended 31 December 2016 was released on April 11, 2017, which is one hundred one (101) days after the end of fiscal year. Meanwhile, Globe’s ASR was released on April 17, 2017 such that the same may be provided and presented to our shareholders during the ASM. These are also posted on our company website:</p> <p>Annual Report (17-A) (Company website) http://investor-relations.globe.com.ph/sec-filings/annual-report-17a.html</p> <p>2016 Annual and Sustainability Report http://investor-relations.globe.com.ph/annual-sustainability-reports.html</p>
D.7.3	Is the true and fairness/fair representation of the annual financial statement/reports affirmed by the board of directors/commissioners and/or the relevant officers of the company?		<p>YES</p> <p>Globe’s Statement of Management’s Responsibility for Financial Statements (SMR) is included in our Audited Financial Statements, which form part of our SEC Form 17-A and ASR.</p>



			<p>The SMR attests to the responsibility of Globe and its Subsidiaries for the preparation and fair presentation of the consolidated financial statements for the years ended December 31, 2016, and 2015. The same contains an attestation of the Board of Directors and their review and approval of the consolidated financial statements and submission of the same to the Company’s stockholders. The SMR is signed by our Chairman, President and CEO and Treasurer and CFO:</p> <p><u>GLO 2016 Audited Financial Statements (Company website)</u> http://investor-relations.globe.com.ph/sec-filings/audited-financial-statements.html</p> <p><u>GLO 2016 SEC Form 17-A, PDF p. 151</u> http://investor-relations.globe.com.ph/sec-filings/annual-report-17a.html</p> <p><u>2016 Annual and Sustainability Report, p. 160</u> http://investor-relations.globe.com.ph/annual-sustainability-reports.html</p>
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Scorecard Item		Guiding Reference	Answer (Yes/No)	GLO Remarks
D.8	Company Website			
Does the company have a website disclosing up-to-date information on the following:				
D.8.1	Financial statements/reports (latest quarterly)	OECD Principle V (A) OECD Principle V (E) ICGN 7.1 Transparent and open communication	YES	<p>Globe’s IR page, in the company website, has a dedicated section for our financial statements/reports (current and up to five years prior).</p> <p>To refer to reports released in prior years, selection years are made available under the main heading of each page:</p>



		<p>ICGN 7.2 Timely disclosure</p>	<p>GLO Quarterly Reports (Company website) http://investor-relations.globe.com.ph/sec-filings/quarterly-report/2017.html</p> <p>GLO 2016 Audited Financial Statements (Company website) http://investor-relations.globe.com.ph/sec-filings/audited-financial-statements.html</p> <p>Periodic Reports including Financial Statements (Company website) http://investor-relations.globe.com.ph/sec-filings/annual-report-17a.html</p> <p>2016 Annual and Sustainability Report, pp. 160-332 http://investor-relations.globe.com.ph/annual-sustainability-reports.html</p>
<p>D.8.2</p>	<p>Materials provided in briefings to analysts and media</p>		<p>YES</p> <p>Globe’s IR page, in the company website, has a dedicated section that contains presentations and materials provided during analysts’ and media briefings:</p> <p>Analysts’ Briefings (Company website) http://investor-relations.globe.com.ph/sec-filings/analysts-briefings/2017.html</p> <p>GLO Quarterly Results Press Release (Company website) http://investor-relations.globe.com.ph/sec-filings/quarterly-results-press-release/2017.html</p> <p>Media Briefings (Company website) http://investor-relations.globe.com.ph/sec-filings/media-briefings.html</p> <p>“IR/Media Calendar” under Investor Relations (Company website)</p>



D.8.3	Downloadable Annual Report		<p>http://investor-relations.globe.com.ph/calendar.html</p> <p>Globe’s Annual Report is viewable and easily downloadable through the company website. The viewable and downloadable Annual Report and other reports are under the “SEC/PSE Disclosures” section of the IR page:</p> <p><u>Annual and Sustainability Reports (Company website)</u> http://investor-relations.globe.com.ph/annual-sustainability-reports.html</p> <p><u>Annual Report (17-A) under SEC/PSE Disclosures in the Investor Relations page (Company website)</u> http://www.globe.com.ph/investor-relations/sec-filings/annual-report-17a</p>
D.8.4	Notice of AGM and/or EGM		<p>YES</p> <p>A page of Globe’s website is dedicated to the ASMs or “Annual Stockholders’ Meetings”. This page contains relevant information for Globe’s stockholders, including the Notice and Agenda of our ASMs:</p> <p><u>Annual Stockholders’ Meetings (Company website)</u> http://corporate-governance.globe.com.ph/annual-stockholders-meetings.html</p>
D.8.5	Minutes of AGM and/or EGM		<p>YES</p> <p>A page of Globe’s website is dedicated to the ASMs or “Annual Stockholders’ Meetings”. This page contains relevant information for Globe’s stockholders, including the Minutes and Voting Results of ASMs. Minutes of our ASMs are made publicly available through our company website two (2) business days after the ASM and Voting Results were made available one (1) business day after the ASM:</p> <p><u>Annual Stockholders’ Meetings (Company website)</u> http://corporate-governance.globe.com.ph/annual-stockholders-meetings.html</p>



<p>D.8.6</p>	<p>Company's constitution (company's by-laws, memorandum and articles of association)</p>		<p>YES</p>	<p>Globe's "Governance" page, in the company website, contains our constitution (Articles of Incorporation), including the By-Laws, memorandum and other policies. Each corporate document is also downloadable:</p> <p><u>Corporate Governance (Company website)</u> http://www.globe.com.ph/corporate-governance</p> <p><u>Articles of Incorporation (Company website)</u> http://www.globe.com.ph/documents/50301/5df37dab-a009-4c3d-a295-534fbbb314e0</p> <p><u>By-Laws (Company website)</u> http://www.globe.com.ph/documents/7122541/7171061/GL OBE+-+Amended+By-Laws+2011.pdf</p> <p><u>ASEAN Corporate Governance Scorecard (Company website)</u> http://corporate-governance.globe.com.ph/acgs.html</p> <p><u>Manual of Corporate Governance (Company website)</u> http://corporate-governance.globe.com.ph/content/dam/multi-microsites/docs/2017/GLOBE%20TELECOM,%20INC.%20CG_SECReceived30May2017.pdf</p> <p><u>Code of Conduct and Ethics (Company website)</u> http://www.globe.com.ph/documents/7122541/94ded150-1606-4424-aef8-a6120d8867a8</p> <p><u>Company Policies (Company website)</u> http://www.globe.com.ph/corporate-governance/company-policies/</p> <p><u>Vision, Mission and Values (Company website)</u></p>
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			http://corporate-governance.globe.com.ph/vision-mission-values.html
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Scorecard Item		Guiding Reference	Answer (Yes/No)	GLO Remarks
D.9	Investor Relations			
D.9.1	Does the company disclose the contact details (e.g. telephone, fax, and email) of the officer/office responsible for investor relations?	ICGN 7.1 Transparent and open communication	YES	<p>Contact details of Globe’s Investor Relations Director, Mr. Jose Mari Fajardo, are disclosed in our company website:</p> <p><u>Investor Relations Contacts at the bottom of the IR page (Company website)</u> http://investor-relations.globe.com.ph/</p> <p>The same is included in our ASR and ACGR:</p> <p><u>2016 Annual and Sustainability Report, pp. 333</u> http://investor-relations.globe.com.ph/annual-sustainability-reports.html</p> <p><u>GLO ACGR Y2016, p. 101 (Part K(2))</u> http://corporate-governance.globe.com.ph/content/dam/multi-microsites/docs/2017/GLO%20ACGR%202016%20Submission_SECReceived26May2017.pdf</p> <p>For other concerns, issues and feedback, the company website also has a “Contact Us” page for all stakeholders and specific contact information for whistleblowers:</p> <p><u>Contact Us (Company website)</u> http://www.globe.com.ph/contactus</p> <p><u>Whistle-Blowing Policy (Company website)</u></p>



			http://corporate-governance.globe.com.ph/company-policies.html
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Globe Telecom, Inc.