



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: (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 ...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 pertinent regulators and made available through our company website. Likewise, these information are disclosed through our financial reports, most recent annual Information Statement (SEC Form 20-IS or DIS), Annual Report (SEC Form 17-A) and most recent annual Integrated Report (iR):</p> <p><u>Top 20 Shareholders (Company website)</u> https://www.globe.com.ph/about-us/investor-relations/stock-information.html</p> <p><u>Top 100 Shareholders by quarter and by year (Company website)</u> https://www.globe.com.ph/about-us/investor-relations/sec-pse-disclosures.html</p> <p><u>Shareholding Structure (Company website)</u> https://www.globe.com.ph/about-us/corporate-governance/shareholding-structure.html</p> <p><u>GLO DIS, p. 11 (Section B, Item 1(e)(i))</u> https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-</p>



			<p>Disclosures/2019/Annual/information-statement/GLO Amended SEC20IS Mar23 final.pdf</p> <p>GLO 2019 SEC Form 17-A, PDF pp. 110-111 (Part III, Item 9) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2019/Annual/annual-report/GLO-17A-2019.pdf</p> <p>GLO IR, p. 64 https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2019.pdf</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, DIS, SEC Form 17-A and Integrated Annual Corporate Governance Report (i-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) https://www.globe.com.ph/about-us/corporate-governance/shareholding-structure.html</p> <p>GLO DIS, pp. 11-13 (Section B, Item 1(e)) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2019/Annual/information-statement/GLO Amended SEC20IS Mar23 final.pdf</p> <p>GLO i-ACGR, pp. 68-70 (Recommendation 2 and Supplement to Recommendation 8.2)</p>



			<p>https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-corporate-governance-report/2019/Globe_SEC_Form_i-ACGR(2019)(PSESECRceived30July2020).pdf</p> <p>GLO SEC Form 17-A, PDF pp. 110-111 (Part III, Item 9) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2019/Annual/annual-report/GLO-17A-2019.pdf</p> <p>GLO IR, pp. 64-67 https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2019.pdf</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, DIS, SEC Form 17-A, i-ACGR and IR.</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. To date, none of our directors owns 2% or more of the outstanding capital stock of the Company:</p> <p>GLO DIS, pp. 11-13 (Section B, Item 1(e)) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2019/Annual/information-statement/GLO_Amended_SEC20IS_Mar23_final.pdf</p> <p>GLO i-ACGR, pp. 68-70 (Recommendation 2 and Supplement to Recommendation 8.2)</p>



			<p>https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-corporate-governance-report/2019/Globe_SEC_Form_i-ACGR(2019)(PSESECRceived30July2020).pdf</p> <p>GLO SEC Form 17-A, PDF pp. 110-111 (Part III, Item 9) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2019/Annual/annual-report/GLO-17A-2019.pdf</p> <p>GLO IR, pp. 64-67 https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2019.pdf</p> <p>Statements of Beneficial Ownership by year (Company website) https://www.globe.com.ph/about-us/investor-relations/sec-pse-disclosures.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, DIS, SEC Form 17-A, ACGR and IR.</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. To date, none of the members of our senior management owns 2% or more of the outstanding capital stock of the Company:</p> <p>GLO DIS, pp. 11-13 (Section B, Item 1(e)) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-</p>



			<p>Disclosures/2019/Annual/information-statement/GLO Amended SEC20IS Mar23 final.pdf</p> <p>GLO i-ACGR, pp. 68-70 (Recommendation 2 and Supplement to Recommendation 8.2) https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-corporate-governance-report/2019/Globe SEC Form i-ACGR(2019)(PSESECRceived30July2020).pdf</p> <p>GLO SEC Form 17-A, PDF pp. 110-111 (Part III, Item 9) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2019/Annual/annual-report/GLO-17A-2019.pdf</p> <p>GLO IR, pp. 64-67 https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2019.pdf</p> <p>Statements of Beneficial Ownership by year (Company website) https://www.globe.com.ph/about-us/investor-relations/sec-pse-disclosures.html</p>
D.1.5	Does the company disclose details of the parent/holding company, subsidiaries, associates, joint ventures and special purpose enterprises/vehicles (SPEs)/(SPVs)?		<p>YES</p> <p>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, 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</p>



				<p>RPTs. All of these are also publicly available through our company website:</p> <p><u>Conglomerate Map (Company website)</u> https://www.globe.com.ph/about-us/corporate-governance/conglomerate-map.html</p> <p><u>GLO DIS, pp. 18-21 (Section B, Item 2(v))</u> https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2019/Annual/information-statement/GLO_Amended_SEC20IS_Mar23_final.pdf</p> <p><u>GLO SEC Form 17-A, PDF pp. 4-7, 110-114</u> https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2019/Annual/annual-report/GLO-17A-2019.pdf</p> <p><u>GLO IR, pp. 8-9</u> https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2019.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;</p>	YES	<p><u>GLO IR, pp. 51, 84, 87, 99, 109, 119, 133, 147, 163</u> https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2019.pdf</p> <p><u>Corporate Objectives (Company website)</u> https://www.globe.com.ph/about-us/corporate-governance/corporate-objectives.html</p>



		(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.		GLO i-ACGR, p. 79 (Optional: Principle 8(1)(a)) https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-corporate-governance-report/2019/Globe_SEC_Form_i-ACGR(2019)(PSESECRceived30July2020).pdf
D.2.2	Financial Performance indicators	OECD Principle V (E): Channels for disseminating information should provide for equal, timely and cost-efficient access to relevant information by users. ICGN 2.4 Composition and structure of the board ICGN 2.4.1 Skills and experience ICGN 2.4.3 Independence ICGN 5.0 Remuneration ICGN 5.4 Transparency	YES	We regularly review our performance against our operating and financial plans and 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. GLO IR, pp. 10, 12-13, 22, 78-81 https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2019.pdf GLO SEC Form 17-A, pp. 45-61 https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2019/Annual/annual-report/GLO-17A-2019.pdf GLO i-ACGR, p. 79 (Optional: Principle 8(1)(b)) https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-corporate-governance-report/2019/Globe_SEC_Form_i-ACGR(2019)(PSESECRceived30July2020).pdf
D.2.3	Non-Financial Performance indicators	UK Corporate Governance Code (2010)	YES	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>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>GLO IR, pp. 13, 81, 126, 135, 138-139, 147-151 https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2019.pdf</p> <p>GLO i-ACGR, p. 79 (Optional: Principle 8(1)(c)) https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-corporate-governance-report/2019/Globe_SEC_Form_i-ACGR(2019)(PSESECREceived30July2020).pdf</p>
D.2.4	Dividend Policy		YES	<p>GLO IR, p. 63 https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2019.pdf</p> <p>GLO i-ACGR, pp. 79, 107 (Optional: Principle 8(1)(d); Supplement to Recommendation 13.1(7)) https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-corporate-governance-report/2019/Globe_SEC_Form_i-ACGR(2019)(PSESECREceived30July2020).pdf</p> <p>GLO SEC Form 17-A, p. 42 https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2019/Annual/annual-report/GLO-17A-2019.pdf</p> <p>Dividend Policy (Company website) https://www.globe.com.ph/about-us/investor-relations/stock-information/dividend-policy.html</p>
D.2.5	Biographical details (at least age, academic qualifications, date of first appointment, relevant experience, and any		YES	<p>GLO IR, pp. 29-39 https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2019.pdf</p> <p>GLO i-ACGR for 2018, p. 79 (Optional 8(1)(e))</p>



	<p>other directorships of listed companies) of all directors/commissioners</p>		<p>https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-corporate-governance-report/2019/Globe_SEC_Form_i-ACGR(2019)(PSESECREceived30July2020).pdf</p> <p>GLO SEC Form 17-A, pp. 97-103 https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2019/Annual/annual-report/GLO-17A-2019.pdf</p> <p>GLO DIS, pp. 28-34 (Annex "A") https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2019/Annual/information-statement/GLO_Amended_SEC20IS_Mar23_final.pdf</p> <p>Board of Directors (Company website) https://www.globe.com.ph/about-us/corporate-governance/board-of-directors.html</p>
<p>D.2.6</p>	<p>Attendance details of each director/commissioner in all directors/commissioners meetings held during the year</p>		<p>YES</p> <p>GLO IR, pp. 46-47 https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2019/Annual/annual-report/Final_2019_Globe_IR.pdf</p> <p>GLO i-ACGR, p. 79 (Optional: Principle 8(1)(f)) https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-corporate-governance-report/2019/Globe_SEC_Form_i-ACGR(2019)(PSESECREceived30July2020).pdf</p> <p>Board Meetings (Company website) https://www.globe.com.ph/about-us/corporate-governance/board-of-directors/meetings.html</p>



				<p>Committee Meetings (Company website) https://www.globe.com.ph/about-us/corporate-governance/board-of-directors/committees.html</p> <p>GLO DIS, pp. 13-14 (Section B, Item 2(a)) https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2019/Annual/information-statement/GLO_Amended_SEC20IS_Mar23_final.pdf</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 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>	YES	<p>GLO IR, p. 47-48 https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2019/Annual/annual-report/Final_2019_Globe_IR.pdf</p> <p>GLO i-ACGR, p. 79 (Optional: Principle 8(1)(g)) https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-corporate-governance-report/2019/Globe_SEC_Form_i-ACGR(2019)(PSESECRreceived30July2020).pdf</p> <p>Board Remuneration (Company website) https://www.globe.com.ph/about-us/corporate-governance/board-of-directors/remuneration.html</p> <p>GLO DIS, p. 22 https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2019/Annual/information-statement/GLO_Amended_SEC20IS_Mar23_final.pdf</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 (1) 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 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</p>	<p>YES</p>	<p>An annual Certification of Compliance is issued and signed by our Chief Compliance Officer and countersigned by our President and CEO. Our Chief Human Resource Officer signs a similar Certification for the CoC. The Certificates of Compliance are also posted on our website.</p> <p><u>GLO IR, p. 166-167</u> <u>https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2019/Annual/annual-report/Final_2019_Globe_IR.pdf</u></p> <p><u>GLO i-ACGR, p. 79 (Optional: Principle 8(2))</u> <u>https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-corporate-governance-report/2019/Globe_SEC_Form_i-ACGR(2019)(PSESECREceived30July2020).pdf</u></p> <p><u>Certificate of Compliance by year (Company website)</u> <u>https://www.globe.com.ph/about-us/corporate-governance/certificate-of-compliance.html</u></p>



	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 company website, i-ACGR, IR and included in our MCG:</p> <p><u>Policy on RPTs (Company website)</u> <u>https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/related-party-transactions/Policy-on-RPTs/GLO-RPT-Policy-2019.pdf</u></p> <p><u>GLO IR, pp. 54, 60</u> <u>https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2019/Annual/annual-report/Final_2019_Globe_IR.pdf</u></p> <p><u>GLO i-ACGR, p. 79 (Optional: Principle 8(3))</u> <u>https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-corporate-governance-report/2019/Globe_SEC_Form_i-ACGR(2019)(PSESECRReceived30July2020).pdf</u></p> <p><u>GLO MCG, pp. 16-17 (Article II, Section 2.12)</u> <u>http://corporate-governance.globe.com.ph/content/dam/multi-</u></p>



			<p>microsites/docs/2017/GLOBE%20TELECOM,%20INC.%20MCG_SECReceived30May2017.pdf</p>
D.3.2	Does the company disclose the name, relationship, nature and value for each material RPT?		<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 i-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 through our website and such other media channels as applicable. Disclosure of RPTs is included in our i-ACGR, SEC Form 17-A, DIS, and company website:</p> <p><u>GLO i-ACGR, pp. 75-76 (Recommendation 8.5(2))</u> https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-corporate-governance-report/2019/Globe_SEC_Form_i-ACGR(2019)(PSESECRReceived30July2020).pdf</p> <p><u>GLO SEC Form 17-A, pp. 79-84</u> 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</p> <p><u>GLO DIS, PDF pp. 223-229 (Note 21 of Audited Financial Statements)</u> https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2019/Annual/information-statement/GLO_Amended_SEC20IS_Mar23_final.pdf</p> <p style="text-align: center;">YES</p>



				<p><u>Historical List of RPTs by year – Policy on Related Party Transactions (Company website)</u> https://www.globe.com.ph/about-us/corporate-governance/related-party-transactions.html</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 pertinent regulators.</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 pertinent regulators. These are also posted on the company website. A summary of which is annually disclosed through our annual reports:</p> <p><u>GLO SEC Form 17-A, pp. 110-111 (Part III, Item 9(B))</u> https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2019/Annual/annual-report/GLO-17A-2019.pdf</p> <p><u>GLO IR, pp. 64-67</u> https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2019/Annual/annual-report/Final_2019_Globe_IR.pdf</p>



				<p>GLO i-ACGR, pp. 68-70 (Recommendation 8.2; Supplement to Recommendation 8.2) https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-corporate-governance-report/2019/Globe_SEC_Form_i-ACGR(2019)(PSESECRceived30July2020).pdf</p> <p>Statements of Beneficial Ownership by year (Company website) https://www.globe.com.ph/about-us/investor-relations/sec-pse-disclosures.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</p>	YES	<p>GLO IR, pp. 56-57 https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2019/Annual/annual-report/Final_2019_Globe_IR.pdf</p> <p>GLO i-ACGR, pp. 85-87 (Recommendation and Supplement to Recommendation 9.3) https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-corporate-governance-report/2019/Globe_SEC_Form_i-ACGR(2019)(PSESECRceived30July2020).pdf</p> <p>“External Audit” under Internal Control Mechanism (Company website) https://www.globe.com.ph/about-us/corporate-governance/internal-control-mechanism.html</p>



D.5.2	Does the non-audit fee exceed the audit fees?	<p>to exercise due professional care in the conduct of the audit.</p> <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>	<p>YES</p>	<p>The Audit and RPT Committee has reviewed and approved services rendered by the external/independent auditors, in accordance with the relevant policies in the Committee's Charter, and concluded that the services and fees do not impair their independence.</p> <p>Fees incurred in relation to the engagement of our external/independent auditor is disclosed in our IR and i-ACGR:</p> <p><u>GLO IR, pp. 56-57</u> https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf</p> <p><u>GLO i-ACGR, pp. 86-87 (Supplement to Recommendation 9.3)</u> https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-corporate-governance-report/2019/Globe_SEC_Form_i-ACGR(2019)(PSESECRceived30July2020).pdf</p> <p><u>"External Audit" under Internal Control Mechanism (Company website)</u> https://www.globe.com.ph/about-us/corporate-governance/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	OECD Principle V (E): Channels for disseminating information should provide for	YES	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



		<p>equal, timely and cost-efficient access to relevant information by users.</p> <p>ICGN 7.1 Transparent and open communication 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>discussion and analysis are filed within 45 and 105 calendar days, respectively, from the end of the financial period. These reports are also posted on our website:</p> <p><u>GLO IR, pp. 62-63</u> https://www.globe.com.ph/content/dam/globe/brie/About-us/sustainability/documents/GLO-Integrated-Report-2018-Final-1.pdf</p> <p><u>GLO i-ACGR, pp. 67-68 (Supplement to Recommendation 8.1)</u> https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-corporate-governance-report/2019/Globe_SEC_Form_i-ACGR(2019)(PSESECRceived30July2020).pdf</p> <p><u>Quarterly Report by year (Company website)</u> https://www.globe.com.ph/about-us/investor-relations/sec-pse-disclosures.html</p>
D.6.2	Company Website		<p>YES</p> <p>Globe fully understands that the changes and progress in digital lifestyle include the fast-paced character of its customers, shareholders and different stakeholders. Because of this, the company website must also be an effective channel of information and a manifestation of CG advocacy. Among other information, the website is updated with corporate announcements, reports and disclosures that are accessible to all stakeholders as well as dedicated pages for CG, Investor Relations, and Sustainability.</p> <p>The website is maintained regularly to ensure user-friendliness, accessibility, accuracy of information and relevance for all our stakeholders:</p> <p><u>About Globe (Company website)</u></p>



			<p>https://www.globe.com.ph/about-us.html</p> <p>Corporate Governance (Company website) https://www.globe.com.ph/about-us/corporate-governance.html</p> <p>Investor Relations (Company website) https://www.globe.com.ph/about-us/investor-relations.html</p> <p>Sustainability (Company website) https://www.globe.com.ph/about-us/sustainability.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 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>The Investor Relations section of the website also contains the annual Investor Relations/Media Calendar of activities, which includes, among others, schedules of analysts’ briefings:</p> <p><u>GLO IR, p. 63</u> https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2019/Annual/annual-report/Final_2019_Globe_IR.pdf</p> <p><u>GLO i-ACGR, pp. 89-90 (Recommendation 11.1)</u> https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-corporate-</p>



			<p>governance-report/2019/Globe_SEC_Form_i-ACGR(2019)(PSESECRceived30July2020).pdf</p> <p>Analysts’ Briefings Materials by year (Company website) https://www.globe.com.ph/about-us/investor-relations/sec-pse-disclosures.html</p> <p>IR/Media Calendar by year – Investor Relations (Company website) https://www.globe.com.ph/about-us/investor-relations.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 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 analysts’ and media briefings. The Investor Relations section of the website also contains our annual Investor Relations/Media Calendar of activities, which includes, among others, schedules of media briefings:</p> <p>GLO IR, p. 63 https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2019/Annual/annual-report/Final_2019_Globe_IR.pdf</p> <p>GLO i-ACGR, pp. 89-90 (Recommendation 11.1)</p>



			<p>https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-corporate-governance-report/2019/Globe_SEC_Form_i-ACGR(2019)(PSESECRReceived30July2020).pdf</p> <p>Analysts' Briefings Materials by year (Company website) https://www.globe.com.ph/about-us/investor-relations/sec-pse-disclosures.html</p> <p>IR/Media Calendar by year – Investor Relations (Company website) https://www.globe.com.ph/about-us/investor-relations.html</p>
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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. Our submission of our consolidated audited financial statements for the financial year ended December 31, 2019 was on February 28, 2020, which is fifty-nine (59) days from the financial year end.</p> <p><u>GLO 2019 Audited Financial Statements</u> https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2019/Annual/audited-financial-statements/GLO-AFS-2019-v2.pdf</p> <p>It is Globe Telecom's policy and practice to release its audited financial statements within 60 days from financial year end. This is in accordance with CG best practices.</p>



			<p><u>GLO Consolidated Audited Financial Statements by year</u> https://www.globe.com.ph/about-us/investor-relations/sec-pse-disclosures.html</p> <p><u>GLO i-ACGR, pp. 67-68 (Supplement to Recommendation 8.1)</u> https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-corporate-governance-report/2019/Globe_SEC_Form_i-ACGR(2019)(PSESECREceived30July2020).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 December 31, 2019 was released on April 13, 2020, which is one hundred fourteen (114) days from financial year end. Meanwhile, Globe's IR, released on the same date, contains information about the company's strategy, governance, and performance in the context of its external environment and how this creates value for stakeholders. These are also posted on our company website:</p> <p><u>Annual Report (SEC Form 17-A) by year (Company website)</u> https://www.globe.com.ph/about-us/investor-relations/sec-pse-disclosures.html</p> <p><u>GLO SEC Form 17-A</u> https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2019/Annual/annual-report/GLO-17A-2019.pdf or https://edge.pse.com.ph/openDiscViewer.do?edge_no=5de780f5df9f24780de8473cebbd6407#sthash.RBvghfpV.dpbs</p> <p><u>GLO IR by year (Company website)</u></p>



			<p>https://www.globe.com.ph/about-us/investor-relations.html</p>
<p>D.7.3</p>	<p>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>		<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 IR.</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, 2018, and 2017. 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 2019 Audited Financial Statements, PDF p. 4</u> https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2019/Annual/audited-financial-statements/GLO-AFS-2019-v2.pdf</p> <p><u>GLO SEC Form 17-A, p. 120</u> https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2019/Annual/annual-report/GLO-17A-2019.pdf</p> <p><u>GLO IR, p. 186</u> https://www.globe.com.ph/content/dam/globe/brie/About-us/investor-relations/documents/SEC-PSE-Disclosures/2019/Annual/annual-report/Final_2019_Globe_IR.pdf</p>



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)	<p>OECD Principle V (A)</p> <p>OECD Principle V (E)</p> <p>ICGN 7.1 Transparent and open communication</p> <p>ICGN 7.2 Timely disclosure</p>	YES	<p>Globe’s Investor Relations page, in the company website, has a dedicated section for our financial statements/reports (current and up to five years prior).</p> <p><u>GLO Quarterly Reports by year (Company website)</u> https://www.globe.com.ph/about-us/investor-relations/sec-pse-disclosures.html</p> <p><u>GLO Audited Financial Statements by year (Company website)</u> https://www.globe.com.ph/about-us/investor-relations/sec-pse-disclosures.html</p> <p><u>Other Reports by year (Company website)</u> https://www.globe.com.ph/about-us/investor-relations/sec-pse-disclosures.html</p>
D.8.2	Materials provided in briefings to analysts and media		YES	<p>Globe’s Investor Relations page, in the company website, has a dedicated section that contains presentations and materials provided during analysts’ and media briefings (current and up to five years prior):</p> <p><u>Analysts’ and Media Briefing Materials by year (Company website)</u> https://www.globe.com.ph/about-us/investor-relations/sec-pse-disclosures.html</p> <p><u>GLO Quarterly Results Press Release by year (Company website)</u> https://www.globe.com.ph/about-us/investor-relations/sec-pse-disclosures.html</p>



				<p><u>Investor Relations/Media Calendar – Investor Relations by year (Company website)</u> https://www.globe.com.ph/about-us/investor-relations.html</p>
D.8.3	Downloadable Annual Report		YES	<p>Globe’s Annual Report is viewable and easily downloadable through the company website (current and up to five years prior):</p> <p><u>GLO Annual Reports by year (Company website)</u> https://www.globe.com.ph/about-us/investor-relations/sec-pse-disclosures.html</p> <p><u>GLO Annual Integrated Reports by year (Company website)</u> https://www.globe.com.ph/about-us/investor-relations.html</p> <p><u>GLO Annual i-ACGR by year (Company website)</u> https://www.globe.com.ph/about-us/corporate-governance/annual-corporate-governance-report.html</p>
D.8.4	Notice of AGM and/or EGM		YES	<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 ASMs (current and up to five years prior):</p> <p><u>Annual Stockholders’ Meetings by year (Company website)</u> https://www.globe.com.ph/about-us/corporate-governance/annual-stockholders-meetings.html</p>
D.8.5	Minutes of AGM and/or EGM		YES	<p>A page of Globe’s website is dedicated to the ASMs. This page contains relevant information for Globe’s stockholders, including the Minutes and Voting Results of ASMs (current and up to five years prior):</p> <p><u>Annual Stockholders’ Meetings by year (Company website)</u> https://www.globe.com.ph/about-us/corporate-governance/annual-stockholders-meetings.html</p>



D.8.6	Company's constitution (company's by-laws, memorandum and articles of association)		<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. Other corporate documents and governance-related documents are also available:</p> <p><u>Corporate Governance (Company website)</u> https://www.globe.com.ph/about-us/corporate-governance.html</p> <p><u>GLO Articles of Incorporation (Company website)</u> https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/articles-of-incorporation/Articles-of-Incorporation.pdf</p> <p><u>GLO By-Laws (Company website)</u> https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/by-laws/By-Laws.pdf</p> <p><u>ASEAN Corporate Governance Scorecard (Company website)</u> https://www.globe.com.ph/about-us/corporate-governance/asean-corporate-governance-scorecard.html</p> <p><u>GLO Manual of Corporate Governance</u> https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/manual-of-corporate-governance/GLO-MCG-SECReceived30May2017.pdf</p> <p><u>GLO Code of Conduct and Ethics</u> https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/company-policies/code-of-conduct-2019.pdf</p> <p><u>Company Policies (Company website)</u></p>
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			https://www.globe.com.ph/about-us/corporate-governance/company-policies.html Vision, Mission and Values (Company website) https://www.globe.com.ph/about-us/corporate-governance/corporate-objeictives.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	Contact details of Globe’s Investor Relations Director, Mr. Jose Mari S. Fajardo, are disclosed in our company website and i-ACGR: <u>Investor Relations Contacts at the bottom of the IR page (Company website)</u> https://www.globe.com.ph/about-us/investor-relations.html GLO i-ACGR, p. 113 (Recommendation 13.5) https://www.globe.com.ph/content/dam/globe/brie/About-us/corporate-governance/documents/annual-corporate-governance-report/2019/Globe_SEC_Form_i-ACGR(2019)(PSESECRceived30July2020).pdf