



109152016001671



SECURITIES AND EXCHANGE COMMISSION

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Company Information

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Industry Classification
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SECURITIES AND EXCHANGE COMMISSION

SEC FORM 17-C

CURRENT REPORT UNDER SECTION 17
OF THE SECURITIES REGULATION CODE
AND SRC RULE 17.2(c) THEREUNDER

1. **15 September 2016**
Date of Report (Date of earliest event reported)
2. SEC Identification Number **80118** 3. BIR Tax Identification No. **000-480-869-000**
4. **NATIONAL REINSURANCE CORPORATION OF THE PHILIPPINES, doing business under the names and styles of Philippine National Reinsurance Company; PhilNaRe**
Exact name of issuer as specified in its charter
5. **Metro Manila, Philippines**
Province, country or other jurisdiction of incorporation
6. (SEC Use Only)
Industry Classification Code:
7. **31st Floor, BPI-Philam Life Makati (formerly: Ayala Life-FGU Center), 6811 Ayala Avenue, Makati City**
Address of principal office
1227
Postal Code
8. **(632) 988-7400**
Issuer's telephone number, including area code
9. **N/A**
Former name or former address, if changed since last report
10. Securities registered pursuant to Sections 8 and 12 of the SRC or Sections 4 and 8 of the RSA

Title of Each Class	Number of Shares of Common Stock Outstanding
Common Shares	2,123,605,600
TOTAL	2,123,605,600

11. Indicate the item numbers reported herein:Item 9 (other events)
-

Anti-Bribery and Corruption Policy of the National Reinsurance Corporation of the Philippines, as approved by the Board of Directors in a meeting on 15 September 2016.

SIGNATURES

Pursuant to the requirements of the Securities Regulation Code, the issuer has duly caused this report to be signed on its behalf by the undersigned hereunto duly authorized, in the City of Makati on 15 September 2016.

**National Reinsurance Corporation of the Philippines,
doing business under the names and styles of Philippine
National Reinsurance Company; PhilNaRe**
Issuer



REGINA S. RAMOS

Vice President, Head of Risk & Compliance

National Reinsurance Corporation of the Philippines

Anti- Bribery and Corruption Policy

1. INTRODUCTION

This document outlines the Company's policy in observing and upholding its position against bribery and corruption. It is not intended to provide a comprehensive account of the processes and procedures the Company adopts in connection with the avoidance of bribery and corruption, but is instead intended to be a statement of principles through which the Company seeks to prevent bribery and corruption and promote integrity in its business activities.

2. PURPOSE

The purpose of this Policy is to set out the responsibilities of all "Covered Person" in observing the Company's commitment to the avoidance of bribery and corruption. In developing the Policy, the Company has made reference to the Organization for Economic Cooperation and Development (OECD) Glossary on Corruption.

3. SCOPE

The Policy shall be complied with by all "Covered Persons", namely (i) directors, (ii) officers, consultants, employees regardless of rank, tenure and status, (iii) shareholders (iv) service providers and (v) independent contractors.

4. DEFINITION

NRCP shall adhere to the OECD's definition of "bribery" and "corruption", as follows:

- (i) Bribery is when any person intentionally offer, promise or give any undue pecuniary or other advantage, whether directly or through intermediaries, to a public or private official, for that official or for a third party, to act or refrain from acting, in relation to the performance of official duties, in order to obtain or retain business, or other improper advantage in the conduct of business.
- (ii) Corruption is the abuse of public or private office for personal gain.

5. POLICY

NRCP's Bribery and Corruption Policy requires Covered Persons:

- (i) Not to offer or make any bribe, unorthodox or unauthorized payment or inducement of any kind to anyone;
- (ii) Not to solicit business by offering any bribe, unorthodox or unofficial payment to customers or potential customers;
- (iii) Not to accept any kind of bribe, unorthodox or unusual payment or inducement that would not be authorized by NRCP in the ordinary course of its business activities;
- (iv) To refuse any bribe or unorthodox payment and to do so in a manner that is not open to misunderstanding or giving rise to false expectation; and

- (v) Not to make facilitation payments, which are used by businesses or individuals to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment has a legal or other entitlement, unless required for medical or safety emergencies and such payments are considered normal. Where this occurs, a record of any such payment should be maintained.

During the interim period, the Covered Persons will report to their immediate superior or to NRCP Compliance Office any breach of this Policy, related principles or standards, or of any associated legislation or regulation. As soon as the Whistle Blowing Policy is formalized, reporting guidelines will be aligned accordingly.

6. ROLE OF SENIOR MANAGEMENT

NRCP's senior management officials are responsible for overseeing the successful implementation of this Policy.

7. TRAINING AND AWARENESS

The Compliance Office will be responsible to communicate this Policy to all covered persons through training, internal memo and proper disclosure in the Company's website for general information and guidance.

This Policy against bribery and corruption is supported by governance procedures covering monitoring, adherence and record keeping. Any breach of the Policy by any employee will be considered as a ground for disciplinary action, which may include dismissal.

8. MONITORING AND REVIEW

All Covered Persons will be required to sign an annual declaration acknowledging that they understand their obligations under this Policy and they confirm compliance with the Policy. The Compliance Office will be responsible to monitor this requirement.

9. RECORD KEEPING AND ANNUAL AUDIT

The Compliance Office will be responsible to keep record of all payments. Internal Audit will be responsible to conduct a review/ audit of these exceptions.