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**STATEMENT OF MANAGEMENT'S RESPONSIBILITY
FOR ANNUAL INCOME TAX RETURN**

The Management of Sun Life Financial Plans, Inc. (the "Company") is responsible for all information and representations contained in the Annual Income Tax Return for the year ended December 31, 2020. Management is likewise responsible for all information and representations contained in the financial statements accompanying the Annual Income Tax Return covering the same reporting period. Furthermore, the Management is responsible for all information and representations contained in all the other tax returns filed for the reporting period, including, but not limited, to the value added-tax and/or percentage tax returns, withholding tax returns, documentary stamp tax returns, and any and all other tax returns.

In this regard, the Management affirms that the attached audited financial statements as at and for the year ended December 31, 2020 and the accompanying Annual Income Tax Return are in accordance with the books and records of the Company, complete and correct in all material respects. Management likewise affirms that:

- a. The Annual Income Tax Return has been prepared in accordance with the provisions of the National Internal Revenue Code, as amended, and pertinent tax regulations and other issuances of the Department of Finance and the Bureau of Internal Revenue;
- b. Any disparity of figures in the submitted reports arising from the preparation of financial statements pursuant to financial accounting standards and the preparation of the income tax return pursuant to tax accounting rules has been reported as reconciling items and maintained in the Company's books and records in accordance with the requirements of Revenue Regulations No. 8-2007 and other relevant issuances;
- c. The Company has filed all applicable tax returns, reports and statements required to be filed under Philippine tax laws for the reporting period, and all taxes and other impositions shown thereon to be due and payable have been paid for the reporting period, except those contested in good faith.

A handwritten signature in cursive script, appearing to read "Lucy Chou", written over a horizontal line.

CHIA-LING CHOU aka LUCY CHOU
Chairman of the Board

A handwritten signature in cursive script, appearing to read "Alexander S. Narciso", written over a horizontal line.

ALEXANDER S. NARCISO
President

A handwritten signature in cursive script, appearing to read "Sherwin S. Sampang", written over a horizontal line.

SHERWIN S. SAMPANG
Treasurer

Navarro Amper & Co.
19th Floor Six/NEO Building
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Philippines

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BOA/PRC Reg. No. 0004
SEC Accreditation No. 0001-FR-5

INDEPENDENT AUDITORS' REPORT TO ACCOMPANY INCOME TAX RETURN

Bureau of Internal Revenue
BIR Building, East Triangle
Diliman, Quezon City

Gentlemen:

In connection with our audit of the statement of financial position of Sun Life Financial Plans, Inc. [A Wholly Owned Subsidiary of Sun Life of Canada (Philippines), Inc.] (the "Company") as at December 31, 2020, and the statement of comprehensive income, statement of changes in equity and statement of cash flows for the year then ended, on which we have rendered our report dated March 2, 2021, and in compliance with the Statement required by Section 8-A of Revenue Regulations V-1, as amended by Revenue Regulations V-20, we state that no partner of our Firm is related by consanguinity or affinity to any of the principal officers and shareholders of the Company.

Navarro Amper & Co.
BOA Registration No. 0004, valid from November 12, 2018 to July 16, 2021
SEC Accreditation No. 0001-FR-5, issued on January 15, 2019; effective until January 14, 2022,
Group A TIN 005299331

By:



Bonifacio F. Lumacang, Jr.
Partner
CPA License No. 0098090
SEC A.N. 1793-A, issued on November 11, 2019; effective until November 10, 2022, Group A
IC A. N. 98090-IC, issued on February 19, 2020; effective until February 18, 2025
TIN 170035681
BIR A.N. 08-002552-018-2020, issued on December 28, 2020; effective until December 28,
2023 PTR No. A-5047290, issued on January 4, 2021, Taguig City

Taguig City, Philippines
March 2, 2021



INDEPENDENT AUDITORS' REPORT

To the Board of Directors and Shareholders
SUN LIFE FINANCIAL PLANS, INC.
[A Wholly Owned Subsidiary of Sun Life of Canada (Philippines), Inc.]
2nd Floor, Sun Life Centre, 5th Avenue corner Rizal Drive
Bonifacio Global City, Taguig City

Report on the Audit of the Financial Statements

Opinion

We have audited the financial statements of Sun Life Financial Plans, Inc. [A Wholly Owned Subsidiary of Sun Lie of Canada (Philippines), Inc.] (the "Company"), which comprise the statements of financial position as at December 31, 2020 and 2019, and the statements of comprehensive income, statements of changes in equity and statements of cash flows for the years then ended, and a summary of significant accounting policies and other explanatory information.

In our opinion, the accompanying financial statements present fairly, in all material respects, the financial position of the Company as at December 31, 2020 and 2019, and its financial performance and its cash flows for the years then ended in accordance with the financial reporting standards in the Philippines for pre-need companies set forth in the amended Securities and Exchange Commission (SEC) Rule 31, Accounting Standards for Pre-need Plans and Pre-need Uniform Chart of Accounts (PNUCA), as required by the rules and regulations of the SEC and adopted by the Insurance Commission (IC).

Basis for Opinion

We conducted our audits in accordance with Philippine Standards on Auditing (PSAs). Our responsibilities under those standards are further described in the *Auditors' Responsibilities for the Audit of the Financial Statements* section of our report. We are independent of the Company in accordance with the Code of Ethics for Professional Accountants in the Philippines (Code of Ethics) together with the ethical requirements that are relevant to our audit of the financial statements in the Philippines, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the Code of Ethics. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Emphasis of Matter

We draw attention to Note 1 to the financial statements, which indicated that the Company has decided to temporarily discontinue actively selling pre-need plans until the market environment improves. All existing pre-need plans will continue to be serviced and supported until maturity by the Company's trust fund assets. Our opinion is not modified in respect of this matter.



Responsibilities of Management and Those Charged with Governance for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with the financial reporting standards in the Philippines for pre-need companies set forth in the amended SEC Rule 31, Accounting Standards for Pre-need Plans and PNUCA, as required by the rules and regulations of SEC and adopted by the IC, and for such internal control as Management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, Management is responsible for assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless Management either intends to liquidate the Company or to cease operations, or has no realistic alternative but to do so.

Those Charged with Governance are responsible for overseeing the Company's financial reporting process.

Auditors' Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditors' report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with PSAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of financial statements.

As part of an audit in accordance with PSAs, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by Management.
- Conclude on the appropriateness of Management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditors' report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditors' report. However, future events or conditions may cause the Company to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with Those Charged with Governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audits.



Report on Other Legal and Regulatory Requirements

Report on the Supplementary Information Required by the Bureau of Internal Revenue

Our audits were conducted for the purpose of forming an opinion on the basic financial statements taken as a whole. The supplementary information in Note 32 to the financial statements is presented for purposes of filing with the Bureau of Internal Revenue and is not a required part of the basic financial statements. Such supplementary information is the responsibility of Management and has been subjected to the auditing procedures applied in our audit of the basic financial statements. In our opinion, the supplementary information is fairly stated in all material respects in relation to the basic financial statements taken as a whole.

Navarro Amper & Co.

BOA Registration No. 0004, valid from November 12, 2018 to July 16, 2021

SEC Accreditation No. 0001-FR-5, issued on January 15, 2019; effective until January 14, 2022, Group A
TIN 005299331

By:



Bonifacio F. Lumacang, Jr.

Partner

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PTR No. A-5047290, issued on January 4, 2021, Taguig City

Taguig City, Philippines

March 2, 2021



SUN LIFE FINANCIAL PLANS, INC.

[A Wholly-Owned Subsidiary of Sun Life of Canada (Philippines), Inc.]

STATEMENTS OF FINANCIAL POSITION

		December 31	
	Notes	2020	2019
ASSETS			
Current Assets			
Cash and cash equivalents	7	P 127,416,845	P 406,073,436
Receivables	8	3,738,969	33,762,517
Prepayments and other current assets - net	9	89,392	78,478
Total Current Assets		131,245,206	439,914,431
Non-current Assets			
Trust funds	11	5,825,196,848	5,587,832,174
Financial assets at fair value through other comprehensive income	10	297,689,820	272,502,360
Financial assets at fair value through profit and loss	10	15,737,744	15,099,104
Total Non-Current Assets		6,138,624,412	5,875,433,638
		P6,269,869,618	P6,315,348,069
LIABILITIES AND EQUITY			
Current Liabilities			
Benefits payable	12	P 182,510,551	P 118,534,046
Accrued expenses and other liabilities	12	10,330,189	5,702,484
Counselors' bond reserve	13	864,251	6,978,265
Payable to parent company	14	3,251,694	3,397,171
Total Current Liabilities		196,956,685	134,611,966
Non-current Liabilities			
Pre-need reserves	15	5,324,268,274	5,606,741,774
Planholders' deposit	16	34,443,942	29,875,807
Total Non-Current Liabilities		5,358,712,216	5,636,617,581
		5,555,668,901	5,771,229,547
Equity			
Share capital	17	125,000,000	125,000,000
Additional paid in capital	18	375,000,000	375,000,000
Contributed surplus	19	400,000,000	400,000,000
Investment revaluation reserves	20	992,905,072	685,725,843
Deficit		(7,398,851,200)	(7,024,163,810)
Accumulated trust fund income	11	6,220,146,845	5,982,556,489
		714,200,717	544,118,522
		P6,269,869,618	P6,315,348,069

See Notes to Financial Statements.

SUN LIFE FINANCIAL PLANS, INC.

[A Wholly-Owned Subsidiary of Sun Life of Canada (Philippines), Inc.]

STATEMENTS OF TOTAL COMPREHENSIVE INCOME

		For the Years Ended December 31	
	Notes	2020	2019
Revenues			
Premium revenue	21	P 89,182,159	P 105,206,379
Trust fund income - net	11	237,590,356	281,159,188
Investment income	25	17,091,730	25,405,460
Decrease in pre-need reserves - net	22	282,287,882	366,614,879
Other income	26	7,955,600	2,069,053
		634,107,727	780,454,959
Expenses			
Other direct costs and expenses	23	742,769,041	1,065,479,580
General and administrative expenses	24	24,684,421	30,404,342
		767,453,462	1,095,883,922
Loss Before Tax		(133,345,735)	(315,428,963)
Income Tax Expense	27	3,751,299	5,213,897
Net Loss for the Year		(137,097,034)	(320,642,860)
Other Comprehensive Income			
Item that will be reclassified			
subsequently to profit or loss			
Fair value gain (loss) on financial assets at FVTOCI	20	307,179,229	663,839,041
Other Comprehensive Income for the Year		307,179,229	663,839,041
Total Comprehensive Income		P 170,082,195	P 343,196,181

See Notes to Financial Statements.

SUN LIFE FINANCIAL PLANS, INC.

[A Wholly-Owned Subsidiary of Sun Life of Canada (Philippines), Inc.]

STATEMENTS OF CHANGES IN EQUITY**For the Years Ended December 31**

	Notes	Share Capital		Total Capital Stock	Additional Paid-in Capital	Contributed Surplus	Investment Revaluation Reserves	Deficit	Accumulated Trust Fund Income	Total
		Ordinary	Preference							
Balance, January 1, 2019		P 75,000,000	P 50,000,000	P 125,000,000	P 375,000,000	P 400,000,000	P 21,886,802	(P 6,422,361,762)	P 5,701,397,301	P 200,922,341
Profit for the year		-	-	-	-	-	-	(601,802,048)	-	(601,802,048)
Trust Fund Income - net	11	-	-	-	-	-	-	-	281,159,188	281,159,188
Other comprehensive income	20	-	-	-	-	-	663,839,041	-	-	663,839,041
Capital contribution		-	-	-	-	-	-	-	-	-
Total comprehensive income		-	-	-	-	-	663,839,041	(601,802,048)	281,159,188	343,196,181
Balance, December 31, 2019		75,000,000	50,000,000	125,000,000	375,000,000	400,000,000	685,725,843	(7,024,163,810)	5,982,556,489	544,118,522
Profit for the year		-	-	-	-	-	-	(P374,687,390)	-	(374,687,390)
Trust fund Income - net	11	-	-	-	-	-	-	-	237,590,356	237,590,356
Other comprehensive income	20	-	-	-	-	-	307,179,229	-	-	307,179,229
Total comprehensive income		-	-	-	-	-	307,179,229	(374,687,390)	237,590,356	170,082,195
Balance, December 31, 2020		P75,000,000	P50,000,000	P125,000,000	P375,000,000	P400,000,000	P992,905,072	(P7,398,851,200)	P6,220,146,845	P714,200,717

See Notes to Financial Statements.

SUN LIFE FINANCIAL PLANS, INC.

[A Wholly-Owned Subsidiary of Sun Life of Canada (Philippines), Inc.]

STATEMENTS OF CASH FLOWS

		For the Years Ended December 31	
	Notes	2020	2019
Cash Flows from Operating Activities			
Loss before tax		(P 133,345,735)	(P 315,428,963)
Adjustments for:			
Pre-need reserves	15	(282,473,500)	(33,239,632)
Trust fund income	11	(237,590,356)	(281,159,188)
Investment income	25	(17,091,730)	(25,405,460)
Write-off of long outstanding liability	26	(6,114,014)	-
Unrealized revaluation gain		(638,640)	(1,525,177)
Additional allowance for non-recoverable prepaid tax	9, 24	488,899	969,200
Amortization of premium-net	10	2,303,320	2,188,832
Depreciation and amortization	24	-	5,136,792
Other reserves		-	(333,594,666)
Operating cash flows before working capital changes		(674,461,756)	(982,058,262)
Decrease (Increase) in:			
Receivables		29,897,930	567,969
Prepayments and other current assets		(499,813)	(761,382)
Increase (Decrease) in:			
Accrued expenses and other liabilities		4,627,706	(3,827,499)
Benefits payable		63,976,505	17,294,626
Payable to parent company		(145,477)	(329,150)
Planholders deposit		4,568,135	678,557
Cash used in operations		(572,036,770)	(968,440,081)
Income taxes paid		(3,751,299)	(5,213,897)
Net cash used in operating activities		(575,788,069)	(973,653,978)
Cash Flows from Investing Activities			
Investment income received		17,217,348	25,547,353
Trust fund contributions	11	(116,110,786)	(283,594,066)
Withdrawals from trust funds	11	396,024,916	1,126,251,578
Net cash from investing activities		297,131,478	868,204,865
Cash Flows from a Financing Activity			
Additional capital infusion	21	-	-
Net Increase (Decrease) in Cash and Cash Equivalents		(278,656,591)	(105,449,113)
Cash and Cash Equivalents, Beginning		406,073,436	511,522,549
Cash and Cash Equivalents, End		P 127,416,845	P 406,073,436

See Notes to Financial Statements.

SUN LIFE FINANCIAL PLANS, INC.

[A Wholly Owned Subsidiary of Sun Life of Canada (Philippines), Inc.]

NOTES TO FINANCIAL STATEMENTS

AS AT AND FOR THE YEARS ENDED DECEMBER 31, 2020 AND 2019

1. CORPORATE INFORMATION AND STATUS OF OPERATIONS

Corporate Information

Sun Life Financial Plans, Inc. (the "Company") was registered with the Philippine Securities and Exchange Commission (SEC) on September 18, 2000 and started commercial operations on June 1, 2001. Its primary purpose is to engage mainly in the development of lawful institutional medium for the maintenance, conduct, operation, marketing and sales of any and all types of securities (without acting as stock broker) including, but not limited to education plans, pension plans, retirement income or retirement plans and life plans, with all the requisite services and facilities, merchandise, equipment or articles essential or relevant to such securities and services to be delivered in the future to planholders, enrollees, purchasers, and subscribers.

The Company is a wholly owned subsidiary of Sun Life of Canada (Philippines), Inc. (SLOCPI). SLOCPI, a wholly owned subsidiary of Sun Life of Canada (Netherlands) B.V., is a stock life insurance company authorized to engage in, conduct, transact, carry on and undertake the business of life insurance, including accident and health insurance. The Company's ultimate parent company is Sun Life Financial, Inc., a company incorporated under the laws of Canada.

The Company's registered office address and principal place of business is at the 2nd Floor, Sun Life Centre, 5th Avenue corner Rizal Drive, Bonifacio Global City, Taguig City.

Status of Operations

On March 1, 2010, the Company decided to temporarily discontinue actively selling pre-need plans until the pre-need market environment improves. All existing pre-need plans will continue to be serviced and supported until maturity by the Company's trust fund assets. As disclosed in Notes 11 and 15, the Company's trust fund net assets amounting to P5,825,196,848 are more than the required Pre-need Reserves (PNR) of P5,324,268,274 and trust fund net assets amounting to P5,587,832,174 are less than the required Pre-need Reserves (PNR) of P5,606,741,774 as at December 31, 2020 and 2019, respectively.

2. FINANCIAL REPORTING FRAMEWORK AND BASIS OF PREPARATION AND PRESENTATION

Statement of Compliance

The financial statements of the Company have been prepared in accordance with the accounting standards set forth in the amended SEC Rule 31, Accounting Standards for Pre-need Plans and Pre-need Uniform Chart of Accounts (PNUCA), as required by the rules and regulations of the SEC and adopted by the Insurance Commission (IC).

Basis of Preparation and Presentation

The financial statements of the Company have been prepared on the historical cost basis, except for:

- certain financial instruments carried at fair value,
- certain financial instruments carried at amortized cost, and
- pre-need reserves carried at present value of expected funding required to settle pre-need benefits guaranteed and payable by the Company.

Historical cost is generally based on the fair value of the consideration given in exchange for goods and services received at inception.

Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date, regardless of whether that price is directly observable or estimated using another valuation technique. In estimating the fair value of an asset or a liability, the Company takes into account the characteristics of the asset or liability if market participants would take those characteristics into account when pricing the asset or liability at the measurement date. Fair value for measurement and/or disclosure purposes in these financial statements is determined on such a basis.

In addition, for financial reporting purposes, fair value measurements are categorized into Level 1, 2 or 3 based on the degree to which the inputs to the fair value measurements are observable and the significance of the inputs to the fair value measurement in its entirety, which are described as follows:

- Level 1 inputs are quoted prices (unadjusted) in active markets for identical assets or liabilities that the entity can access at the measurement date;
- Level 2 inputs are inputs, other than quoted prices included within Level 1, that are observable for the asset or liability, either directly or indirectly; and
- Level 3 inputs are unobservable inputs for the asset or liability.

Functional and Presentation Currency

The financial statements are presented in Philippine Peso, the currency of the primary economic environment in which the Company operates. All amounts are recorded in the nearest peso, except when otherwise indicated.

3. ADOPTION OF NEW AND REVISED ACCOUNTING STANDARDS

Adoption of New and Revised Accounting Standards Effective in 2020

The Company adopted all accounting standards and interpretations as at December 31, 2020. The new and revised accounting standards and interpretations that have been published by the International Accounting Standards Board (IASB) and approved by the FRSC in the Philippines, were assessed to be applicable to the Company's financial statements, are as follows:

Amendments to PAS 1 and PAS 8, *Definition of Material*

The amendments relate to a revised definition of 'material':

"Information is material if omitting, misstating or obscuring it could reasonably be expected to influence decisions that the primary users of general purpose financial statements make on the basis of those financial statements, which provide financial information about a specific reporting entity."

Three new aspects of the new definition include (i) obscuring; (ii) could reasonably be expected to influence; and (iii) primary users.

The amendments stress especially five ways material information can be obscured:

- if the language regarding a material item, transaction or other event is vague or unclear;
- if information regarding a material item, transaction or other event is scattered in different places in the financial statements;
- if dissimilar items, transactions or other events are inappropriately aggregated;
- if similar items, transactions or other events are inappropriately disaggregated; and
- if material information is hidden by immaterial information to the extent that it becomes unclear what information is material.

The adoption of the amendments had no impact on the financial statements of the Company as there is no information not disclosed in the notes that will cause the obscuring of financial statements.

New Accounting Standards Effective after the Reporting Period Ended December 31, 2020

Amendments to PFRS 16, COVID-19-Related Rent Concessions

Amendment to PFRS 16 provides practical relief to lessees in accounting for rent concessions occurring as a direct consequence of COVID-19, by introducing a practical expedient to PFRS 16. The practical expedient permits a lessee to elect not to assess whether a COVID-19-related rent concession is a lease modification. A lessee that makes this election shall account for any change in lease payments resulting from the

COVID-19-related rent concession the same way it would account for the change applying PFRS 16 if the change were not a lease modification.

The practical expedient applies only to rent concessions occurring as a direct consequence of COVID-19 and only if all of the following conditions are met:

- a) The change in lease payments results in revised consideration for the lease that is substantially the same as, or less than, the consideration for the lease immediately preceding the change;
- b) Any reduction in lease payments affects only payments originally due on or before 30 June 2021 (a rent concession meets this condition if it results in reduced lease payments on or before 30 June 2021 and increased lease payments that extend beyond 30 June 2021); and
- c) There is no substantive change to other terms and conditions of the lease.

This amendment will have no impact on the financial statements as the Company does not have lease contracts.

The amendments are effective for annual periods beginning on or after June 1, 2020. Earlier application is permitted, including in financial statements not authorized for issue at May 28, 2020.

PFRS 17 — *Insurance Contracts*

PFRS 17 establishes the principles for the recognition, measurement, presentation and disclosure of insurance contracts and supersedes PFRS 4 *Insurance Contracts*.

PFRS 17 outlines a general model, which is modified for insurance contracts with direct participation features, described as the variable fee approach. The general model is simplified if certain criteria are met by measuring the liability for remaining coverage using the premium allocation approach.

The general model uses current assumptions to estimate the amount, timing and uncertainty of future cash flows and it explicitly measures the cost of that uncertainty. It takes into account market interest rates and the impact of policyholders' options and guarantees.

An amendment issued on June 2020 and adopted by FRSC on August 2020 addresses concerns and implementation challenges that were identified after PFRS 17 was published.

PFRS 17 must be applied retrospectively unless impracticable, in which case the modified retrospective approach or the fair value approach is applied.

For the purpose of the transition requirements, the date of initial application is the start of the annual reporting period in which the entity first applies the Standard, and the transition date is the beginning of the period immediately preceding the date of initial application.

The standard (incorporating the amendments) is effective for periods beginning on or after January 1, 2025. Earlier application is permitted.

The management of the Company is still evaluating the impact of the amendment.

Amendments to PFRS 3, References to the Conceptual Framework

The amendments update PFRS 3 so that it refers to the 2018 Conceptual Framework instead of the 1989 Framework. They also add to PFRS 3 a requirement that, for obligations within the scope of PAS 37, an acquirer applies PAS 37 to determine whether at the acquisition date a present obligation exists as a result of past events. For a levy that would be within the scope of IFRIC 21 Levies, the acquirer applies IFRIC 21 to determine whether the obligating event that gives rise to a liability to pay the levy has occurred by the acquisition date.

The amendments also add an explicit statement that an acquirer does not recognize contingent assets acquired in a business combination.

The amendments are effective for business combinations for which the date of acquisition is on or after the beginning of the first annual period beginning on or after January 1, 2022. Early application is permitted if an entity also applies all other updated references (published together with the updated Conceptual Framework) at the same time or earlier.

The management of the Company is still evaluating the impact of the amendments.

Amendments to PFRS 10 and PAS 28, Sale or Contribution of Assets between and Investor and Its Associate or Joint Venture

The amendments to PFRS 10 and PAS 28 deal with situations where there is a sale or contribution of assets between an investor and its associate or joint venture. Specifically, the amendments state that gains or losses resulting from the loss of control of a subsidiary that does not contain a business in a transaction with an associate or a joint venture that is accounted for using the equity method, are recognized in the parent's profit or loss only to the extent of the unrelated investors' interests in that associate or joint venture. Similarly, gains and losses resulting from the remeasurement of investments retained in any former subsidiary (that has become an associate or a joint venture that is accounted for using the equity method) to fair value are recognized in the former parent's profit or loss only to the extent of the unrelated investors' interests in the new associate or joint venture.

The effective date of the amendments has yet to be set by the Board; however, earlier application of the amendments is permitted.

The management of the Company is still evaluating the impact of the amendments.

Amendments to PAS 1, Classification of Liabilities as Current or Non-current

The amendments to PAS 1 affect only the presentation of liabilities as current or non-current in the statement of financial position and not the amount or timing of recognition of any asset, liability, income or expenses, or the information disclosed about those items.

The amendments clarify that the classification of liabilities as current or non-current is based on rights that are in existence at the end of the reporting period, specify that classification is unaffected by expectations about whether an entity will exercise its right to defer settlement of a liability, explain that rights are in existence if covenants are complied with at the end of the reporting period, and introduce a definition of 'settlement' to make clear that settlement refers to the transfer to the counterparty of cash, equity instruments, other assets or services.

The amendments are applied retrospectively for annual periods beginning on or after 1 January 2023, with early application permitted.

The Company does not anticipate that the application of the amendments in the future will have an impact on the financial statements since as a financial institution, presentation based on liquidity is more appropriate.

Amendments to PAS 16, Property, Plant and Equipment – Proceeds before Intended Use

The amendments prohibit deducting from the cost of an item of property, plant and equipment any proceeds from selling items produced before that asset is available for use, i.e. proceeds while bringing the asset to the location and condition necessary for it to be capable of operating in the manner intended by management. Consequently, an entity recognizes such sales proceeds and related costs in profit or loss. The entity measures the cost of those items in accordance with PAS 2 *Inventories*.

The amendments also clarify the meaning of 'testing whether an asset is functioning properly'. PAS 16 now specifies this as assessing whether the technical and physical performance of the asset is such that it is capable of being used in the production or supply of goods or services, for rental to others, or for administrative purposes.

If not presented separately in the statement of comprehensive income, the financial statements shall disclose the amounts of proceeds and cost included in profit or loss that relate to items produced that are not an output of the entity's ordinary activities, and which line item(s) in the statement of comprehensive income include(s) such proceeds and cost.

The amendments are applied retrospectively, but only to items of property, plant and equipment that are brought to the location and condition necessary for them to be capable of operating in the manner intended by management on or after the beginning of the earliest period presented in the financial statements in which the entity first applies the amendments.

The entity shall recognize the cumulative effect of initially applying the amendments as an adjustment to the opening balance of retained earnings (or other component of equity, as appropriate) at the beginning of that earliest period presented.

The amendments are effective for annual periods beginning on or after 1 January 2022, with early application permitted.

The adoption of the amendments did not have an impact on the Company's financial statements as the Company does not have property, plant and equipment.

Amendments to PAS 37, Onerous Contracts – Cost of Fulfilling a Contract

The amendments specify that the 'cost of fulfilling' a contract comprises the 'costs that relate directly to the contract'. Costs that relate directly to a contract consist of both the incremental costs of fulfilling that contract (examples would be direct labour or materials) and an allocation of other costs that relate directly to fulfilling contracts (an example would be the allocation of the depreciation charge for an item of property, plant and equipment used in fulfilling the contract).

The amendments apply to contracts for which the entity has not yet fulfilled all its obligations at the beginning of the annual reporting period in which the entity first applies the amendments. Comparatives are not restated. Instead, the entity shall recognize the cumulative effect of initially applying the amendments as an adjustment to the opening balance of retained earnings or other component of equity, as appropriate, at the date of initial application.

The amendments are effective for annual periods beginning on or after 1 January 2022, with early application permitted.

The management of the Company is still evaluating the impact of the amendments.

Annual Improvements to PFRS Standards 2018-2020 Cycle

Amendments to PFRS 1 – Subsidiary as a first-time adopter

The amendment provides additional relief to a subsidiary which becomes a first-time adopter later than its parent in respect of accounting for cumulative translation differences. As a result of the amendment, a subsidiary that uses the exemption in PFRS 1:D16 (a) can now also elect to measure cumulative translation differences for all foreign operations at the carrying amount that would be included in the parent's consolidated financial statements, based on the parent's date of transition to PFRS Standards, if no adjustments were made for consolidation procedures and for the effects of the business combination in which the parent acquired the subsidiary. A similar election is available to an associate or joint venture that uses the exemption in PFRS 1:D16 (a).

The amendment is effective for annual periods beginning on or after 1 January 2022, with early application permitted.

The adoption of the amendments did not have an impact on the Company's financial statements as the Company does not have other currency denomination transaction.

Amendments to PFRS 9 – Fees in the '10 per cent' test for derecognition of financial liabilities

The amendment clarifies that in applying the '10 per cent' test to assess whether to derecognize a financial liability, an entity includes only fees paid or received between the entity (the borrower) and the lender, including fees paid or received by either the entity or the lender on the other's behalf.

The amendment is applied prospectively to modifications and exchanges that occur on or after the date the entity first applies the amendment.

The amendment is effective for annual periods beginning on or after 1 January 2022, with early application permitted.

The Company is still evaluating the impact of the amendments.

Amendments to PFRS 16 – Lease Incentives

The amendment removes the illustration of the reimbursement of leasehold improvements.

As the amendment to PFRS 16 only regards an illustrative example, no effective date is stated.

The adoption of the amendments did not have an impact on the Company's financial statements as the Company does not have lease incentives.

Amendments to PAS 41 – Taxation in fair value measurements

The amendment removes the requirement in PAS 41 for entities to exclude cash flows for taxation when measuring fair value. This aligns the fair value measurement in PAS 41 with the requirements of PFRS 13 *Fair Value Measurement* to use internally consistent cash flows and discount rates and enables preparers to determine whether to use pretax or post-tax cash flows and discount rates for the most appropriate fair value measurement.

The amendment is applied prospectively, i.e. for fair value measurements on or after the date an entity initially applies the amendment.

The amendment is effective for annual periods beginning on or after 1 January 2022, with early application permitted.

The Company is still evaluating the impact of the amendment.

New Accounting Standards Effective in 2020 - Adopted by Financial Reporting Standards Council (FRSC) but pending for approval by the Board of Accountancy.

PIC Q&A No. 2019-04, *Conforming Changes to PIC Q&As – Cycle 2019*

The interpretation sets out the changes (i.e., amendments or withdrawal) to certain interpretations. These changes are made as a consequence of the issuance of new PFRS that become effective starting January 1, 2019 and other relevant developments.

PIC Q&As Amended

The following table summarizes the changes made to the amended interpretations:

PIC Q&A Amended	Amendment
PIC Q&A No. 2011-05: PFRS 1 – Fair Value or Revaluation as Deemed Cost	Updated because of applying PFRS 16, <i>Leases</i> , for the first time starting January 1, 2019.
PIC Q&A No. 2011-06: Acquisition of investment properties – asset acquisition or business combination?	Reference to PAS 40, <i>Investment Property</i> , has been updated because of applying PFRS 16 for the first time starting January 1, 2019.
PIC Q&A No. 2012-02: Cost of a new building constructed on the site of a previous building	Reference to PAS 40 has been updated because of applying PFRS 16 for the first time starting January 1, 2019.
PIC Q&A No. 2017-02: PAS 2 and PAS 16 - Capitalization of operating lease cost as part of construction costs of a building	Updated to comply with the provisions of PFRS 16 and renamed as PIC Q&A No. 2017-02: PAS 2 and PAS 16 - Capitalization of depreciation of right-of-use asset as part of construction costs of a building
PIC Q&A No. 2017-10: PAS 40 - Separation of property and classification as investment property	Reference to PAS 40 has been updated because of applying PFRS 16 for the first time starting January 1, 2019.
PIC Q&A No. 2018-05: PAS 37 - Liability arising from maintenance requirement of an asset held under a lease	Updated to comply with the provisions of PFRS 16
PIC Q&A No. 2018-15: PAS 1- Classification of Advances to Contractors in the Nature of Prepayments: Current vs. Non-current	Reference to PAS 40 (included as an attachment to the Q&A) has been updated because of applying PFRS 16 for the first time starting January 1, 2019.

PIC Q&A Withdrawn

PIC Q&A Withdrawn	Basis for Withdrawal
PIC Q&A No. 2017-09: PAS 17 and Philippine Interpretation SIC-15 - Accounting for payments between and among lessors and lessees	This PIC Q&A is considered withdrawn starting January 1, 2019, which is the effective date of PFRS 16. PFRS 16 superseded PAS 17, <i>Leases</i> , and Philippine Interpretation SIC-15, <i>Operating Leases— Incentives</i>
PIC Q&A No. 2018-07: PAS 27 and PAS 28 - Cost of an associate, joint venture, or subsidiary in separate financial statements	This PIC Q&A is considered withdrawn upon publication of IFRIC agenda decision - Investment in a subsidiary accounted for at cost: Step acquisition (IAS 27 <i>Separate Financial Statements</i>) in January 2019.

The effective date of the amendments is included in the affected interpretations.

The Company is still assessing the impact of the interpretations.

PIC Q&A No. 2019-06, *Accounting for step acquisition of a subsidiary in a parent*

The interpretation clarifies how a parent should account for the step acquisition of a subsidiary in its separate financial statements.

Salient points of the interpretation are the following:

IFRIC concluded either of the two approaches may be applied:

- Fair value as deemed cost approach

Under this approach, the entity is exchanging its initial interest (plus consideration paid for the additional interest) for a controlling interest in the investee (exchange view). Hence, the entity's investment in subsidiary is measured at the fair value at the time the control is acquired.

- Accumulated cost approach

Under this approach, the entity is purchasing additional interest while retaining the initial interest (non-exchange view). Hence, the entity's investment in subsidiary is measured at the accumulated cost (original consideration).

Any difference between the fair value of the initial interest at the date of obtaining control of the subsidiary and its original consideration is taken to profit or loss, regardless of whether, before the step acquisition transaction, the entity had presented subsequent changes in fair value of its initial interest in profit or loss or other comprehensive income (OCI).

The interpretation is effective for periods beginning on or after October 19, 2019.

The interpretation is not applicable to the Company as it did not have acquisitions in 2019 and 2020.

PIC Q&A No. 2019-07, *Classification of Members' Capital Contributions of Non-Stock Savings and Loan Associations (NSSLAs)*

Background:

The Bangko Sentral ng Pilipinas (BSP) issued Circular No. 1045 on August 29, 2019 to amend the Manual of Regulations for Non-Bank Financial Institutions Applicable to Non-Stock Savings and Loan Associations (MORNBFI-S) – Regulatory Capital of Non-Stock Savings and Loan Associations (NSSLAs) and Capital Contributions of Members.

Under the Circular, each qualified member of an NSSLAs shall maintain only one capital contribution account representing his/her capital contribution. While only one capital account is maintained, the Circular breaks down a member's capital contributions as follows:

- a. Fixed capital which cannot be reduced for the duration of membership except upon termination of membership. The minimum amount of fixed capital is Php1,000, but a higher minimum can be prescribed under the NSSLAs by-laws.
- b. Capital contribution buffer, which pertains to capital contributions in excess of fixed capital. The capital contribution buffer can be withdrawn or reduced by the member without affecting his membership. However, the NSSLAs shall establish and prescribe the conditions and/or circumstances when the NSSLAs may limit the reduction of the members' capital contribution buffer, such as, when the NSSLAs is under liquidity stress or is unable to meet the capital-to-risk assets ratio requirement under Sec. 4116S of the MORNBFI-S Regulations. Such conditions and/or circumstances have to be disclosed to the members upon their placement of capital contribution buffer and in manners as may be determined by the Board.

For purposes of identifying and monitoring the fixed capital and capital contribution buffer of a member's capital contribution, NSSLAs shall maintain subsidiary ledgers showing separately the fixed and capital contribution buffer of each member. Further, upon receipt of capital contributions from their members, NSSLAs shall simultaneously record the amount contributed as fixed and capital contribution buffer in the aforementioned subsidiary ledgers. However, NSSLAs may use other systems in lieu of subsidiary ledgers provided that the system will separately show the fixed and capital contribution buffer of each member.

The interpretation assessed and concluded that both Fixed Capital and the Capital contribution buffer qualify as "equity" in the NSSLAs' financial statements as they both meet all the requirements of paragraphs 16A and 16B of PAS32, *Financial Instruments: Presentation*.

The interpretation is effective for periods beginning on December 11, 2019, and should be applied retrospectively.

The interpretation is not applicable as the Company is not a NSSLAs.

PIC Q&A No. 2019-08, PFRS 16, *Leases - Accounting for Asset Retirement or Restoration Obligation ("ARO")*

The interpretation clarifies the recognition of ARO under the following scenarios:

1) Accounting for ARO at lease commencement date

The cost of dismantling and restoration (i.e., the ARO) should be calculated and recognized as a provision in accordance with PAS 37, with a corresponding adjustment to the related ROU asset as required by PFRS 16.24(d). As such, the lessee will add the amount of ARO to the cost of the ROU asset on lease commencement date, which will then form part of the amount that will be amortized over the lease term.

2) Change in ARO after initial recognition

2.1) Because ARO is not included as a component of lease liability, the measurement of such ARO is outside the scope of PFRS 16. Hence, its measurement is generally not affected by the transition to PFRS 16. Except in cases where the reassessment of lease-related assumptions (e.g., lease term) would affect the measurement of ARO-related provision, the amount of ARO existing at transition date would not be remeasured; rather, the balance of the ARO provision and any related asset will remain as previously measured. The asset will simply be reclassified from property and equipment to the related ROU asset as required under PFRS 16.24(d).

2.2) Assuming there is a change in lease-related assumptions that would impact the ARO measurement (e.g., change in lease term due to the new PFRS 16 requirements), the following will be the accounting treatment depending on the method used by the lessee in adopting PFRS 16:

a. *Modified retrospective approach* - Under this approach, the lessee uses the remaining lease term to discount back the amount of provision to transition date. Any adjustment is recognized as an adjustment to the ROU asset and ARO provision. This adjustment applies irrespective of which of the two methods in measuring the ROU asset will be chosen under the modified retrospective approach.

b. *Full retrospective approach* - The ARO provision and related asset, which gets adjusted to the ROU asset, should be remeasured from commencement of the lease, and then amortized over the revised or reassessed lease term. Because full retrospective approach is chosen, it is possible that the amount of cumulative adjustment to the ARO provision and the ROU asset at the beginning of the earliest period presented will not be the same; hence, it is possible that it might impact retained earnings.

The adoption of the interpretation did not have an impact on the Company's financial statements as the Company does not have lease agreements.

PIC Q&A No. 2019-09, Accounting for Prepaid Rent or Rent Liability Arising from Straight-lining under PAS 17 on Transition to PFRS 16 and the Related Deferred Tax Effects

The interpretation aims to provide guidance on the following:

1. How a lessee should account for its transition from PAS 17 to PFRS 16 using the modified retrospective approach. Specifically, this aims to address how a lessee should, on transition, account for any existing prepaid rent or rent liability arising from straight-lining of an operating lease under PAS 17, and
2. How to account for the related deferred tax effects on transition from PAS 17 to PFRS 16.

The adoption of the interpretation did not have an impact on the Company's financial statements as the Company does not have lease agreements.

PIC Q&A No. 2019-10, Accounting for variable payments with rent review

Some lease contracts provide for market rent review in the middle of the lease term to adjust the lease payments to reflect a fair market rent for the remainder of the lease term. This Q&A provides guidance on how to measure the lease liability when the contract provides for a market rent review.

The adoption of the interpretation did not have an impact on the Company's financial statements as the Company does not have lease agreements.

PIC Q&A No. 2019-11, Determining the current portion of an amortizing loan/lease liability

The interpretation aims to provide guidance on how to determine the current portion of an amortizing loan/lease liability for proper classification/presentation between current and non-current in the statement of financial position.

The adoption of the interpretation did not have an impact on the Company's financial statements as the Company does not have lease agreements.

PIC Q&A No. 2019-12, PFRS 16, Leases – Determining the lease term

The interpretation provides guidance how an entity determine the lease term under PFRS 16.

A contract would be considered to exist only when it creates rights and obligations that are enforceable. Therefore, any non-cancellable period or notice period in a lease would meet the definition of a contract and, thus, would be included as part of the lease term. To be part of a contract, any option to extend or terminate the lease that are included in the lease term must also be enforceable.

If optional periods are not enforceable (e.g., if the lessee cannot enforce the extension of the lease without the agreement of the lessor), the lessee does not have the right to use the asset beyond the non-cancellable period. Consequently, by definition, there is no contract beyond the non-cancellable period (plus any notice period) if there are no enforceable rights and obligations existing between the lessee and lessor beyond that term.

In assessing the enforceability of a contract, an entity should consider whether the lessor can refuse to agree to a request from the lessee to extend the lease. Accordingly, if the lessee has the right to extend or terminate the lease, there are enforceable rights and obligations beyond the initial noncancellable period and thus, the parties to the lease would be required to consider those optional periods in their assessment of the lease term. In contrast, a lessor's right to terminate a lease is ignored when determining the lease term because, in that case, the lessee has an unconditional obligation to pay for the right to use the asset for the period of the lease, unless and until the lessor decides to terminate the lease.

In assessing whether a lessee is reasonably certain to exercise an option to extend a lease, or not to exercise an option to terminate a lease, an entity shall consider all relevant facts and circumstances (i.e., including those that are not indicated in the lease contract) that create an economic incentive for the lessee to exercise the option to extend the lease, or not to exercise the option to terminate the lease.

The adoption of the interpretation did not have an impact on the Company's financial statements as the Company does not have lease agreements.

PIC Q&A No. 2019-13, PFRS 16, *Leases – Determining the lease term of leases that are renewable subject to mutual agreement of the lessor and the lessee*

The interpretation provides guidance how an entity determine the lease term under PFRS 16. This interpretation focuses on lease contracts that are renewable subject to mutual agreement of the parties.

A renewal option is only considered in determining the lease term if it is enforceable. A renewal that is still subject to mutual agreement of the parties is legally unenforceable under Philippine laws until both parties come to an agreement on the terms.

In instances where the lessee have known to be, historically, renewing the lease contract after securing mutual agreement with the lessor to renew the lease contract, the lessee's right to use the underlying asset does not go beyond the one-year period covered by the current contract, as any renewal still has to be agreed on by both parties. A renewal is treated as a new contract.

The adoption of the interpretation did not have an impact on the Company's financial statements as the Company does not have lease agreements PIC Q&A No. 2020-01, *Conforming Changes to PIC Q&As – Cycle 2020*

The interpretation sets out the changes (i.e., amendments or withdrawal) to certain interpretations. These changes are made as a consequence of the issuance of new PFRS that become effective starting January 1, 2019 and other relevant developments.

PIC Q&As Amended

The following table summarizes the changes made to the amended interpretations:

PIC Q&A Amended	Amendment
Framework 4.1 and PAS 1.25 – Financial statements prepared on a basis other than going concern	References to <i>The Conceptual Framework for Financial Reporting</i> have been updated due to the revised framework effective January 1, 2020
PIC Q&A No. 2016-03: Accounting for common areas and the related subsequent costs by condominium corporations	References to <i>The Conceptual Framework for Financial Reporting</i> have been updated due to the revised framework effective January 1, 2020
PIC Q&A No. 2011-03: Accounting for intercompany loans	References to <i>The Conceptual Framework for Financial Reporting</i> have been updated due to the revised framework effective January 1, 2020
PIC Q&A No. 2017-08: PFRS 10 – Requirement to prepare consolidated financial statements where an entity disposes of its single investment in a subsidiary, associate or joint venture	References to <i>The Conceptual Framework for Financial Reporting</i> have been updated due to the revised framework effective January 1, 2020
PIC Q&A No. 2018-14: PFRS 15 – Accounting for cancellation of real estate sales	References to <i>The Conceptual Framework for Financial Reporting</i> have been updated due to the revised framework effective January 1, 2020

PIC Q&A Withdrawn

PIC Q&A Withdrawn	Basis for Withdrawal
PIC Q&A No. 2011-06: Acquisition of investment properties – asset acquisition or business combination?	With the amendment to PFRS 3 on the definition of a business effective January 1, 2020, there is additional guidance in paragraphs B7A-B12D of PFRS 3 in assessing whether acquisition of investment properties is an asset acquisition or business combination (i.e. optional concentration test and assessment of whether an acquired process is substantive)

The effective date of the amendments is included in the affected interpretations.

The Company believes that the foregoing interpretations do not have a material impact on the financial statements.

PIC Q&A No. 2020-02, Conclusion on PIC QA 2018-12E: On certain materials delivered on site but not yet installed

The interpretation provides guidance on the treatment of the customized materials in recognizing revenue using a cost-based input method.

For each performance obligation satisfied over time, entity shall recognize the revenue by measuring towards complete satisfaction. In such case, materials that are customized, even if uninstalled, are to be included in the measurement of progress in completing its performance obligations.

However, in the case of uninstalled materials that are not customized, revenue should only be recognized upon installation or use in construction. Revenue cannot be recognized even up to the extent of cost unless it met all the criteria listed in the standards.

The interpretation did not have an impact on the financial statements as the Company is not engaged in real estate business.

PIC Q&A No. 2020-03, On the accounting of the difference when the percentage of completion is ahead of the buyer's payment

The interpretation clarifies that recognition of either contract asset or receivable is acceptable in case the revenue recognized based on percentage of completion (POC) is ahead of the buyer's payment as long as this is consistently applied in transactions of the same nature and disclosure requirements of PFRS 15 for contract assets or receivables, as applicable, are complied.

The interpretation did not have an impact on the financial statements as the Company does not recognize revenue based on percentage of completion.

PIC Q&A No. 2020-04(Addendum to PIC Q&A 2018-12-D), PFRS 15 - Step 3 - Requires and Entity to Determine the Transaction Price for the Contract

The interpretation clarifies that, in case of mismatch between the POC and schedule of payments, there is no significant financing component if the difference between the promised consideration and the cash selling price of the goods or service arises for the reasons other than the provision of finance to either the customer or the entity, and the difference between those amounts is proportional to the reason for the difference.

The interpretation did not have an impact on the financial statements as the Company does not recognize revenue based on percentage of completion

PIC Q&A No. 2020-05, PFRS 15 - Accounting for Cancellation of Real Estate Sales

The interpretation provided guidance on the accounting for cancellation of real estate sales and the repossession of the property. They provided three (3) approaches as follows:

1. The reposessed property is recognized at its fair value less cost to repossess
2. The reposessed property is recognized at its fair value plus repossession cost
3. Accounted as modification of contract

Either of the above mentioned approaches are acceptable as long as its applied consistently. All approaches above should consider payments to buyers required under the Maceda Law and the write-off of any unamortized portion of cost of obtaining a contract in its determination of gain/loss from repossession.

The interpretation did not have an impact on the financial statements as the Company is not engaged in real estate business.

PIC Q&A No. 2020-06, PFRS 16 - Accounting for payments between and among lessors and lessees

The interpretation provides for the treatment of payments between and among lessors and lessees as follows:

		Treatments in the financial statements of			
	Transaction	Lessor	Old lessor	New Lessee	Basis
1	Lessor pays old lessee - lessor intends to renovate the building	i. Recalculate the revised leased payments (net of the one-off amount to be paid) and amortize over the revised lease term. ii. If net payable, recognize as expense unless the amount to be paid qualifies as capitalizable cost under PAS 16 or PAS 40; in which case it is capitalized as part of the carrying amount of the associated property if it meets the definition of construction costs under PAS 16 or PAS 40.	i. Recognize in profit and loss at the date of modification the difference between the proportionate decrease in the right-of-use asset based on the remaining right-of-use asset for the remaining period and remaining lease liability calculated as the present value of the remaining lease payments discounted using the original discount rate of the lease. ii. Recognize the effect of remeasurement of the remaining lease liability as an adjustment to the right-of use-asset by referring to the revised lease payments (net of any amount to be received from the lessor)and using a revised discount rate.		<ul style="list-style-type: none"> • PFRS 16; par. 87 • PAS 16; pars. 6, 16-17 • PAS 40; par. 21 • PFRS 16; par. 45 • Illustrative example 18 issued by IASB • PAS 16; pars. 56-57

		Treatments in the financial statements of			
	Transaction	Lessor	Old lessor	New Lessee	Basis
			iii. Revisit the amortization period of right-of-use asset and any related leasehold improvement following the shortening of the term.		
2	Lessor pays old lessee - new lease with higher quality lessee	Same as Item 1	Same as Item 1		Same as Item 1 PFRS 16 par. 83
3	Lessor pays new lessee - an incentive to occupy	<p>i. Finance lease:</p> <ul style="list-style-type: none"> • If made after commencement date, incentive payable is credited with offsetting debit entry to the net investment lease. • If paid at or prior to commencement date, included in the calculation of gain or loss on disposal on finance lease. <p>ii. Operating lease add the initial direct costs to the carrying amount of underlying asset and recognize as expense over the lease term either on a straight-line basis or another systematic basis.</p>		<p>i. Record as a deduction to the cost of the right-of-use asset.</p> <p>ii. Lease incentive receivable is also included as reduction in measurement of lease liability.</p> <p>iii. When lessee receives the payment of lease incentive, the amount received is debited with a credit entry to gross up the lease liability.</p>	<ul style="list-style-type: none"> • PAS 16; par. 68 • PAS 16; par. 71 • PFRS 16; par. 83 • PFRS 16; par. 24

4	Lessor pays new lessee - building alterations specific to the lessee with no further value to lessor	Same as Item 3		i. Same as in fact pattern 1C. ii. Capitalize costs incurred by the lessee for alterations to the building as leasehold improvement in accordance with PAS 16 or PAS 40.	<ul style="list-style-type: none"> • Same as in fact pattern 1C. • PAS 40; par. 21 • PAS 16; pars. 16-17
5	Old lessee pays lessor to vacate the leased premises early	Recognize as income immediately, unless it was within the original contract and the probability criterion was previously met, in which case, the amount would have already been recognized as income using either a straight-line basis or another systematic basis.	Recognize as expense immediately unless it was within the original contract and the probability criterion was previously met, in which case, the financial impact would have been recognized already as part of the lease liability.		<ul style="list-style-type: none"> • PAS 16 • PAS 38 • PFRS 16; par. 18
6	Old lessee pays new lessee to take over the lease		Recognize as an expense immediately.	Recognize as income immediately.	<ul style="list-style-type: none"> • PAS 16 • PAS 38 • PFRS 16; Appendix A
7	New lessee pays lessor to secure the right to obtain a lease agreement	i. If finance lease, recognize gain or loss in the profit or loss arising from the derecognition of underlying assets ii. If operating lease, recognize as deferred revenue and amortize over the lease term on a straight-line basis or another systematic basis.		Recognize as part of the cost of the right-of-use asset.	<ul style="list-style-type: none"> • PFRS 16; par. 24 • PAS 16; par. 71 • PFRS 16; par. 81

8	New lessee pays old lessee to buy out the lease agreement		Recognize as again immediately. Any remaining lease liability and right-of-use asset will be derecognized with net amount through P&L.	Account for as initial direct cost included in the measurement of the right-of-use asset.	<ul style="list-style-type: none"> • PFRS 16; Appendix A • PFRS 16; Example 13 in par. IE5 • PFRS 16; par. 24
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The interpretation did not have an impact on the financial statements as the Company has no lease agreements.

PIC Q&A No. 2020-07, PAS 12 – Accounting for the Proposed Changes in Income Tax Rates under the Corporate Recovery and Tax Incentives for Enterprises Act (CREATE) Bill

The interpretation explained the details of the CREATE bill and its impact on the financial statements once passed.

Interpretation discussed that impact on the financial statements ending December 31, 2020 are as follows:

- Current and deferred taxes will still be measured using the applicable income tax rate as of December 31, 2020
- If the CREATE bill is enacted before financial statements' issue date, this will be a non-adjusting event but the significant effects of changes in tax rates on current and deferred tax assets and liabilities should be disclosed
- If the CREATE bill is enacted after financial statements' issue date but before filing of the income tax return, this is no longer a subsequent event but companies may consider disclosing the general key feature of the bill and the expected impact on the FS

For the financial statements ending December 31, 2021, the impact are as follows:

- Standard provides that component of tax expense(income) may include "any adjustments recognized in the period for current tax of prior periods" and "the amount of deferred tax expense(income) relating to changes in tax rates or the imposition of new taxes"
- An explanation of changes in the applicable income tax rates to the previous accounting period is also required to be disclosed
- The provision for current income tax for the year 2021 will include the difference between income tax per 2020 financial statements and 2020 income tax return
- Deferred tax assets and liabilities as of December 31, 2021, will be remeasured using the new tax rates
- Any movement in deferred taxes arising from the change in tax rates that will form part of the provision for/benefit from deferred taxes will be included as well in the effective tax rate reconciliation

The Company is still evaluating the impact of the interpretations.

4. PRE-NEED RULES

The SEC, prior to the IC assuming regulatory supervision to the pre-need industry, has provided the rules and regulations of the PNUCA, including the guidelines in determining reserves on liabilities on pre-need contracts. The Company adopted Pre-need Rule 31, As Amended: Accounting Standards for Pre-need Plans and PNUCA, and the subsequent amendments effective January 1, 2007 and April 20, 2007, respectively. The following are the significant provisions of these guidelines:

- a. The net asset value in the trust fund shall be at least equal to the required Pre-need Reserves (PNR) computed pursuant to the method prescribed by the SEC.

- b. PNR shall be set up for all pre-need benefits guaranteed and payable by the pre-need company as defined in the pre-need plan contracts.
- c. Unless the SEC shall so specifically require, a company may at its option set up other provisions as a prudent measure.
- d. Premiums from sale of pre-need plans shall be recognized as earned when collected. When premiums are recognized as income, the related cost of contracts shall be computed, with the result that benefits and expenses are matched with such income.
- e. The amount of restricted/appropriated and unrestricted/unappropriated retained earnings shall be separately presented in the statements of changes in equity. However, no appropriation of the retained earnings shall be made by the Company unless the same is approved by the SEC or allowed in the Pre-need Rules.
- f. In recognizing PNR, the general requirements of PAS 37, *Provision, Contingent Liabilities and Contingent Assets*, on provisioning and the specific methodology provided shall be complied with. The amount recognized as a provision to cover the PNR shall be the best estimate of the expenditure required to settle the present obligation at the end of each reporting period. The risks and uncertainties that inevitably surround many events and circumstances shall be taken into account in reaching the best estimate of a provision.
- g. Since the effect of the time value of money for pre-need plans is material, the amount of provision shall be the present value of the funding expected to be required to settle the obligation with due consideration of different probabilities.
- h. Future events that may affect the foregoing amounts shall be reflected in the amount of the provision for PNR where there is sufficient objective evidence that they will occur.
- i. Any pre-need company which adopts the foregoing reserving method shall discuss in its notes to financial statements its concrete plan on the sourcing of funds to cover its committed augmentation of the difference between the hurdle and attainable rates, during the periods when it used hurdle rates in the computation of its reserving requirements.
- j. The rates of surrender, cancellation, reinstatement, utilization, and inflation, when applied, must consider the actual experience of the pre-need company in the last three (3) years, or the industry, in the absence of a reliable company experience.
- k. The computation of the foregoing assumptions shall be validated by the internal qualified actuary of the pre-need company. His or her validation report shall be provided to its external auditors for purposes of statutory audit of the financial statements of the Company, and shall be submitted to the IC as a separate report.
- l. The probability of pre-termination or surrender of fully paid plans shall be considered in determining the PNR of fully paid plans. A pre-termination experience on fully paid plans of 5% and below shall be considered insignificant. In such cases, derecognition of liability shall be recorded at pre-termination date.
- m. The disclosure requirements under PAS 1 relative to methods and assumptions used to estimate the PNR including the sensitivity of the PNR amount shall be complied with.
- n. Any excess in the amount of the trust fund as a result of the revised reserving method shall neither be released from the fund nor be credited/off-set to future required contributions.

5. SIGNIFICANT ACCOUNTING POLICIES

Financial Instruments

Financial assets and financial liabilities are recognized in the Company's financial statements when the Company becomes a party to the contractual provisions of the instrument.

Initial recognition

Financial assets and financial liabilities are initially measured at fair value. Transaction costs that are directly attributable to the acquisition or issue of financial assets and financial liabilities (other than financial assets and financial liabilities at fair value through profit or loss) are added to or deducted from the fair value of the financial assets or financial liabilities, as appropriate, on initial recognition. Transaction costs directly attributable to the acquisition of financial assets or financial liabilities at fair value through profit or loss are recognized immediately in profit or loss.

Financial Assets

Classification and subsequent measurement

All regular way purchases or sales of financial assets are recognized and derecognized on a trade date basis. Regular way purchases or sales are purchases or sales of financial assets that require delivery of assets within the period established by regulation or convention in the marketplace.

All recognized financial assets are subsequently measured in their entirety at either amortized cost or fair value, depending on the classification of the financial assets.

Fair value is determined in the manner described in Note 29.

Financial assets are subsequently measured at amortized cost or fair value on the basis of the entity's business model for managing the financial assets and the contractual cash flow characteristics of the financial assets, as follows:

- financial assets that are held within a business model whose objective is to collect the contractual cash flows, and that have contractual cash flows that are solely payments of principal and interest on the principal amount outstanding (SPPI), are subsequently measured at amortized cost;
- financial assets that are held within a business model whose objective is both to collect the contractual cash flows and to sell the debt instruments, and that have contractual cash flows that are SPPI, are subsequently measured at fair value through other comprehensive income (FVOCI);
- all other financial assets managed on their fair value basis and equity instruments are subsequently measured at fair value through profit or loss (FVTPL).

However, the Company may make the following irrevocable election/designation at initial recognition of a financial asset:

- the Company may irrevocably elect to present subsequent changes in fair value of an equity investment in other comprehensive income if it is neither held for trading nor a contingent consideration recognized by an acquirer in a business combination to which PFRS 3 applies; and
- the Company may irrevocably designate a debt investment that meets the amortized cost or FVOCI criteria as measured at FVTPL if doing so eliminates or significantly reduces an accounting mismatch.

Amortized cost and effective interest method

The effective interest method is a method of calculating the amortized cost of a financial asset and of allocating interest income over the relevant period.

For financial instruments other than purchased or originated credit-impaired financial assets (i.e. assets that are credit-impaired on initial recognition), the effective interest rate is the rate that exactly discounts estimated future cash receipts (including all fees and points paid or received that form an integral part of the effective interest rate, transaction costs and other premiums or discounts) excluding expected credit losses, through the expected life of the debt instrument, or, where appropriate, a shorter period, to the gross carrying amount of the debt instrument on initial recognition.

The amortized cost of a financial asset is the amount at which the financial asset is measured at initial recognition minus the principal repayments, plus the cumulative amortization using the effective interest method of any difference between that initial amount and the maturity amount, adjusted for any loss allowance. On the other hand, the gross carrying amount of a financial asset is the amortized cost of a financial asset before adjusting for any loss allowance

Interest income is recognized using the effective interest method for debt instruments measured subsequently at amortized cost and at FVOCI.

For financial instruments other than purchased or originated credit-impaired financial assets, interest income is calculated by applying the effective interest rate to the gross carrying amount of a financial asset, except for financial assets that have subsequently become credit-impaired.

Debt instruments classified as at FVOCI

Corporate bonds held by the Company are classified as at FVOCI. The corporate bonds are initially measured at fair value plus transaction costs.

Subsequently, changes in the carrying amount of these corporate bonds as a result of foreign exchange gains and losses, impairment gains or losses, and interest income calculated using the effective interest method are recognized in profit or loss.

The amounts that are recognized in profit or loss are the same as the amounts that would have been recognized in profit or loss if these corporate bonds had been measured at amortized cost.

All other changes in the carrying amount of these corporate bonds are recognized in other comprehensive income and accumulated under the heading of investments revaluation reserve. When these listed redeemable notes are derecognized, the cumulative gains or losses previously recognized in other comprehensive income are reclassified to profit or loss.

Equity instruments designated as at FVOCI

On initial recognition, the Company may make an irrevocable election (on an instrument-by-instrument basis) to designate investments in equity instruments as at FVOCI. Designation at FVOCI is not permitted if the equity investment is held for trading or if it is contingent consideration recognized by an acquirer in a business combination to which PFRS 3 applies.

A financial asset is held for trading if:

- it has been acquired principally for the purpose of selling it in the near term; or
- on initial recognition it is part of a portfolio of identified financial instruments that the Group manages together and has evidence of a recent actual pattern of short-term profit-taking; or
- it is a derivative (except for a derivative that is a financial guarantee contract or a designated and effective hedging instrument).

Investments in equity instruments at FVOCI are initially measured at fair value plus transaction costs. Subsequently, they are measured at fair value with gains and losses arising from changes in fair value recognized in other comprehensive income and accumulated in the investments revaluation reserve. The cumulative gain or loss will not be reclassified to profit or loss on disposal of the equity investments, instead, they will be transferred to retained earnings.

Dividends on these investments in equity instruments are recognized in profit or loss in accordance with PFRS 9, unless the dividends clearly represent a recovery of part of the cost of the investment.

Financial assets at FVTPL

Financial assets at FVTPL are:

- assets with contractual cash flows that are not SPPI; or/and

- assets that are held in a business model other than held to collect contractual cash flows or held to collect and sell; or
- assets designated at FVTPL using the fair value option.

Financial assets at FVTPL are measured at fair value at the end of each reporting period, with any fair value gains or losses recognized in profit or loss to the extent they are not part of a designated hedging relationship. The net gain or loss recognized in profit or loss includes any dividend or interest earned on the financial asset.

Impairment

The Company recognizes a loss allowance for expected credit losses (ECL) for expected credit losses (ECL) on financial assets at amortized cost.

The amount of expected credit losses is updated at each reporting date to reflect changes in credit risk since initial recognition of the respective financial instrument.

The Company always recognizes lifetime ECL for trade receivables. The expected credit losses on these financial assets are estimated using a provision matrix based on the Company's historical credit loss experience, adjusted for factors that are specific to the debtors, general economic conditions and an assessment of both the current as well as the forecast direction of conditions at the reporting date, including time value of money where appropriate.

For all other financial instruments, the Company recognizes lifetime ECL when there has been a significant increase in credit risk since initial recognition. If, on the other hand, the credit risk on the financial instrument has not increased significantly since initial recognition, the Company measures the loss allowance for that financial instrument at an amount equal to 12 month ECL. The assessment of whether lifetime ECL should be recognized is based on significant increases in the likelihood or risk of a default occurring since initial recognition instead of on evidence of a financial asset being credit-impaired at the reporting date or an actual default occurring.

Lifetime ECL represents the expected credit losses that will result from all possible default events over the expected life of a financial instrument. In contrast, 12-month ECL represents the portion of lifetime ECL that is expected to result from default events on a financial instrument that are possible within 12 months after the reporting date.

ECLs are a probability-weighted estimate of the present value of credit losses. These are measured as the present value of the difference between the cash flows due to the Group under the contract and the cash flows that the Company expects to receive arising from the weighting of multiple future economic scenarios, discounted at the asset's effective interest rate.

The Company measures ECL on an individual basis, or on a collective basis for portfolios of loans that share similar economic risk characteristics. The measurement of the loss allowance is based on the present value of the asset's expected cash flows using the asset's original effective interest rate (EIR) method, regardless of whether it is measured on an individual basis or a collective basis.

Significant increase in credit risk

The Company monitors all financial assets, issued loan commitments and financial guarantee contracts that are subject to the impairment requirements to assess whether there has been a significant increase in credit risk since initial recognition. If there has been a significant increase in credit risk the Company will measure the loss allowance based on lifetime rather than 12-month ECL.

The Company has elected to use practical expedient and presumes that receivables do not have significant financing component as the expected term is less than one year.

In assessing whether the credit risk on a financial instrument has increased significantly since initial recognition, the Company compares the risk of a default occurring on the financial instrument at the reporting date based on the remaining maturity of the instrument with the risk of a default occurring that was anticipated for the remaining maturity at the current reporting date when the financial instrument was first recognized. In making this assessment, the Company considers both quantitative and qualitative information that is reasonable and supportable, including historical experience and information that is available without undue cost or effort.

Forward-looking information considered includes the future prospects of the industries in which the Company's debtors operate, financial analysts, relevant think-tanks and other similar organizations, as well as consideration of various external sources of actual and forecast economic information that relate to the Company's core operations.

In particular, the following information is taken into account when assessing whether credit risk has increased significantly since initial recognition:

- an actual or expected significant deterioration in the financial instrument's external (if available) or internal credit rating;
- significant deterioration in external market indicators of credit risk for a particular financial instrument (e.g. a significant increase in the credit spread, the credit default swap prices for the debtor, or the length of time or the extent to which the fair value of a financial asset has been less than its amortized cost);
- existing or forecast adverse changes in business, financial or economic conditions that are expected to cause a significant decrease in the debtor's ability to meet its debt obligations;
- an actual or expected significant deterioration in the operating results of the debtor;
- significant increases in credit risk on other financial instruments of the same debtor;
- an actual or expected significant adverse change in the regulatory, economic, or technological environment of the debtor that results in a significant decrease in the debtor's ability to meet its debt obligations.

Irrespective of the outcome of the above assessment, the Company presumes that the credit risk on a financial asset has increased significantly since initial recognition when contractual payments are more than 30 days past due.

Despite the foregoing, the Company assumes that the credit risk on a financial instrument has not increased significantly since initial recognition if the financial instrument is determined to have low credit risk at the reporting date.

A financial instrument is determined to have low credit risk if:

- The financial instrument has a low risk of default;
- The debtor has a strong capacity to meet its contractual cash flow obligations in the near term; and
- Adverse changes in economic and business conditions in the longer term may, but will not necessarily, reduce the ability of the borrower to fulfil its contractual cash flow obligations.

The Company considers a financial asset to have low credit risk when the asset has external credit rating of 'investment grade' in accordance with the globally understood definition or if an external rating is not available, the asset has an internal rating of 'performing'. Performing means that the counterparty has a strong financial position and there is no past due amounts.

The Company regularly monitors the effectiveness of the criteria used to identify whether there has been a significant increase in credit risk and revises them as appropriate to ensure that the criteria are capable of identifying significant increase in credit risk before the amount becomes past due.

Default

The Company considers the following as constituting an event of default for internal credit risk management purposes as historical experience indicates that financial assets that meet either of the following criteria are generally not recoverable:

- when there is a breach of financial covenants by the debtor; or
- information developed internally or obtained from external sources indicates that the debtor is unlikely to pay its creditors, including the Company in full (without taking into account any collateral held by the Company).

Irrespective of the above analysis, the Company considers that default has occurred when a financial asset is more than 90 days past due unless the Group has reasonable and supportable information to demonstrate that a more lagging default criterion is more appropriate.

Critical to the determination of ECL is the definition of default. The definition of default is used in measuring the amount of ECL and in the determination of whether the loss allowance is based on 12-month or lifetime ECL, as default is a component of the probability of default (PD) which affects both the measurement of ECLs and the identification of a significant increase in credit risk.

Overdrafts are considered as being past due once the customer has breached an advised limit or has been advised of a limit smaller than the current amount outstanding. The definition of default is appropriately tailored to reflect different characteristics of different types of assets. Overdrafts are considered as being past due once the customer has breached an advised limit or has been advised of a limit smaller than the current amount outstanding.

Credit-impaired financial assets

A financial asset is credit-impaired when one or more events that have a detrimental impact on the estimated future cash flows of the financial asset have occurred. Evidence of credit-impairment includes observable data about the following events:

- significant financial difficulty of the borrower or issuer;
- a breach of contract such as a default or past due event;
- the lender of the borrower, for economic or contractual reasons relating to the borrower's financial difficulty, having granted to the borrower a concession that the lender would not otherwise consider;
- it is becoming probable that the borrower will enter bankruptcy or other financial reorganization;
- the disappearance of an active market for a security because of financial difficulties; or
- the purchase of a financial asset at a deep discount that reflects the incurred credit losses.

It may not be possible to identify a single discrete event—instead, the combined effect of several events may have caused financial assets to become credit-impaired. The Company assesses whether debt instruments that are financial assets measured at amortized cost is credit-impaired at each reporting date. To assess if debt instruments are credit impaired, the Company considers factors such as bond yields, credit ratings and the ability of the borrower to raise funding.

Write-off

The Company writes off a financial asset when there is information indicating that the debtor is in severe financial difficulty and there is no realistic prospect of recovery, when the debtor has been placed under liquidation or has entered into bankruptcy proceedings, or in the case of trade receivables, when the amounts are over two years past due, whichever occurs sooner.

Financial assets written off may still be subject to enforcement activities under the Company's recovery procedures, taking into account legal advice where appropriate. Any recoveries made are recognized in profit or loss.

Measurement and recognition of expected credit losses

The measurement of ECL is a function of the probability of default, loss given default (i.e. the magnitude of the loss if there is a default) and the exposure at default. The assessment of the probability of default and loss given default is based on historical data adjusted by forward-looking information.

As for the exposure at default, for financial assets, this is represented by the assets' gross carrying amount at the reporting date, the Company's understanding of the specific future financing needs of the debtors, and other relevant forward-looking information.

For financial assets, the ECL is estimated as the difference between all contractual cash flows that are due to the Company in accordance with the contract and all the cash flows that the Company expects to receive, discounted at the original effective interest rate. For a lease receivable, the cash flows used for determining the ECL is consistent with the cash flows used in measuring the lease receivable in accordance with PAS 17, *Leases*.

If the Company has measured the loss allowance for a financial instrument at an amount equal to lifetime ECL in the previous reporting period, but determines at the current reporting date that the conditions for lifetime ECL are no longer met, the Company measures the loss allowance at an amount equal to 12-month ECL at the current reporting date, except for assets for which simplified approach was used.

The Company recognizes an impairment gain or loss in profit or loss for all financial instruments with a corresponding adjustment to their carrying amount through a loss allowance account, except for investments in debt instruments that are measured at FVOCI, for which the loss allowance is recognized in other comprehensive income and accumulated in the investment revaluation reserve, and does not reduce the carrying amount of the financial asset in the statement of financial position.

Presentation of allowance for ECL in the statement of financial position

Loss allowances for ECL are presented in the statement of financial position as follows:

- for financial assets measured at amortized cost: as a deduction from the gross carrying amount of the assets;
- for debt instruments measured at FVOCI: no loss allowance is recognized in the statement of financial position as the carrying amount is at fair value. However, the loss allowance is included as part of the revaluation amount in the investments revaluation reserve; and
- for loan commitments and financial guarantee contracts: as a provision.

Derecognition

The Company derecognizes a financial asset only when the contractual rights to the asset's cash flows expire or when the financial asset and substantially all the risks and rewards of ownership of the asset are transferred to another entity. If the Company neither transfers nor retains substantially all the risks and rewards of ownership and continues to control the transferred asset, the Company recognizes its retained interest in the asset and an associated liability for amounts it may have to pay. If the Company retains substantially all the risks and rewards of ownership of a transferred financial asset, the Company continues to recognize the financial asset and also recognizes a collateralized borrowing for the proceeds received.

On derecognition of a financial asset in its entirety, the difference between the asset's carrying amount and the sum of the consideration received and receivable and the cumulative gain/loss that had been recognized in OCI and accumulated in equity is recognized in profit or loss, with the exception of equity investment designated as measured at FVOCI, where the cumulative gain/loss previously recognized in OCI is not subsequently reclassified to profit or loss, but is transferred to retained earnings.

Financial Liabilities

Classification and subsequent measurement

In both the current and prior period, financial liabilities are classified as subsequently measured at amortized cost, except for:

- Financial liabilities at fair value through profit or loss. This classification is applied to derivatives, financial liabilities held for trading and other financial liabilities designated as such at initial recognition.
- Financial liabilities arising from the transfer of financial assets which did not qualify for derecognition, whereby a financial liability is recognized for the consideration received for the transfer.
- Financial guarantee contracts and loan commitments.

The Company's financial liabilities consists of other financial liabilities.

Other financial liabilities

Other financial liabilities are initially measured at fair value, net of transaction costs. Other financial liabilities are subsequently measured at amortized cost using the effective interest method.

The effective interest method is a method of calculating the amortized cost of a financial liability and of allocating interest expense over the relevant period. The EIR is the rate that exactly discounts estimated future cash payments through the expected life of the financial liability, or, where appropriate, a shorter period, to the net carrying amount on initial recognition.

Derecognition

Financial liabilities are derecognized when they are extinguished (i.e. when the obligation specified in the contract is discharged, cancelled or has expired).

Accounting policies applied prior to January 1, 2019

The Company has applied PFRS 9 retrospectively, but has elected not to restate comparative information. As a result, the comparative information provided continues to be accounted for in accordance with the Company's previous accounting policy.

Financial Liabilities and Equity Instruments

Classification as debt or equity

Debt and equity instruments are classified as either financial liabilities or as equity in accordance with the substance of the contractual arrangements and the definitions of a financial liability and an equity instrument.

Financial liabilities

All financial liabilities are measured subsequently at amortized cost using the effective interest method or at FVTPL. Financial liabilities are classified as either financial liabilities 'at FVTPL' or 'other financial liabilities'.

Financial liabilities measured subsequently at amortized cost

Financial liabilities that are not (i) contingent consideration of an acquirer in a business combination, (ii) held-for-trading, or (iii) designated as at FVTPL, are measured subsequently at amortized cost using the effective interest method.

The effective interest method is a method of calculating the amortized cost of a financial liability and of allocating interest expense over the relevant period. The effective interest rate is the rate that exactly discounts estimated future cash payments (including all fees and points paid or received that form an integral part of the effective interest rate, transaction costs and other premiums or discounts) through the expected life of the financial liability, or (where appropriate) a shorter period, to the amortized cost of a financial liability.

Offsetting financial instruments

Financial assets and liabilities are offset and the net amount reported in the statements of financial position when there is a legally enforceable right to offset the recognized amounts and there is an intention to settle on a net basis or realize the asset and settle the liability simultaneously.

A right to offset must be available today rather than being contingent on a future event and must be exercisable by any of the counterparties, both in the normal course of business and in the event of default, insolvency or bankruptcy.

Derecognition of financial liabilities

The Group derecognizes financial liabilities when, and only when, the Company's obligations are discharged, cancelled or have expired. The difference between the carrying amount of the financial liability derecognized and the consideration paid and payable is recognized in profit or loss.

If the modification is not substantial, the difference between: (1) the carrying amount of the liability before the modification; and (2) the present value of the cash flows after modification should be recognized in profit or loss as the modification gain or loss within other gains and losses.

Equity Instruments

An equity instrument is any contract that evidences a residual interest in the assets of the Company after deducting all of its liabilities. Equity instruments issued by the Company are recognized at the proceeds received, net of direct issue costs.

Ordinary shares

Ordinary shares are classified as equity. Incremental costs directly attributable to the issue of new shares or options are considered as a deduction from the proceeds, net of tax.

Preference shares

Preference shares are classified as equity if it is non-redeemable, or redeemable only at the Company's option, and any dividends are discretionary dividends thereon are recognized as distribution within equity upon approval by the Company's shareholders.

Preference shares are classified as a financial liability if it is redeemable on a specific date or at the option of the shareholders, or if dividend payments are not discretionary. Non-discretionary dividends thereon are recognized as interest expense in profit or loss as accrued.

Deficit

Deficit represents accumulated losses incurred by the Company. Deficit may also include effect of changes in accounting policy as may be required by the standard's transitional provisions.

Additional paid-in capital

Additional paid-in capital is classified as equity and refers to the amount received by the Company for subscription of shares in excess of par value of the shares.

Contributed surplus

Contributed surplus refers to the amount raised by the Company in the form of capital infusion without issuance of shares.

Prepayments

Prepayments represent expenses not yet incurred but already paid in cash. Prepayments are initially recorded as assets and measured at the amount of cash paid. Subsequently, these are charged to profit or loss as these are consumed in operations or expire with the passage of time.

Prepayments are classified in the statements of financial position as current asset when the cost of services related to the prepayments are expected to be incurred within one (1) year or the Company's normal operating cycle, whichever is longer. Otherwise, prepayments are classified as non-current assets.

Provisions and Contingent Liabilities

Provisions

Provisions are recognized when the Company has a present obligation, either legal or constructive, as a result of a past event; when it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation, and; when the amount of the obligation can be estimated reliably.

The amount of the provision recognized is the best estimate of the consideration required to settle the present obligation at the end of the reporting period, taking into account the risks and uncertainties surrounding the obligation. A provision is measured using the present value of cash flows estimated to settle the present obligation.

When the Company expects reimbursement of some or all of the expenditure required to settle a provision, the entity recognizes a separate asset for the reimbursement only when it is virtually certain that reimbursement will be received when the obligation is settled.

Provisions are reviewed at the end of each reporting period and adjusted to reflect the current best estimate.

If it is no longer probable that a transfer of economic benefits will be required to settle the obligation, the provisions should be reversed.

Contingent liabilities

Contingent liabilities are not recognized because their existence will be confirmed only by the occurrence or non-occurrence of one or more uncertain future events not wholly within the control of the Company.

Contingent liabilities are disclosed, unless the possibility of an outflow of resources embodying economic benefits is remote.

Pre-need Reserves (PNR)

PNR are calculated on the basis of the methodology and assumptions set out below:

- a. The formula, methods and assumptions used for the valuation of reserves are based on the SEC Notice dated April 20, 2007, and subsequent SEC Interpretative Bulletin No. 1, Series of 2008 on its implementation. These may be different from the reserve formula, methods and assumptions used in the computation of actuarial reserve submitted to the SEC upon the application for product approval or upon the application for revisions to be done on existing products subsequently approved by the SEC.
- b. PNR is set up for all pre-need benefits guaranteed and payable by the pre-need company as defined in the pre-need plan contracts.
- c. In recognizing PNR for educational and pension plans, the general requirements of PAS 37 on provisioning and the specific methodology are complied with by the Company.

- d. The amount recognized as a provision to cover the PNR is the best estimate of the expenditure required to settle the present obligation at the end of each reporting period. The risks and uncertainties that inevitably surround many events and circumstances are taken into account in reaching the best estimate of a provision.
- e. Since the effect of the time value of money for pre-need plans is material, the amount of provision is the present value of the funding expected to be required to settle the obligation with due consideration of the different probabilities, as follows:
 - i. On Currently-Being-Paid Plans
 - 1. Provision for termination values applying the surrender rate experience of the Company.
 - 2. Liability is set-up for the portion of currently-being-paid plans that will reach full payment, applying the full payment experience of the Company. It is equivalent to the present value of future maturity benefits reduced by the present value of future trust fund contributions discounted using the appropriate discount rate.

Currently-Being-Paid Plans pertain to accounts that are up-to-date in payment and include in-force plans as defined in the contract provision, i.e., plans within the 60-day grace period.
 - ii. On Lapsed Plans within the Allowable Reinstatement Period

Provision for termination values applying the reinstatement experience of the Company.
 - iii. Fully Paid Plans

The reserve is the present value of future maturity benefits discounted using the appropriate discount rate.
- f. The actual experience of the Company in the last three (3) years is considered in the application of rates (surrender, cancellation, reinstatement, utilization, and inflation).
- g. The actuary validated the actuarial assumptions used in reserve valuation.
- h. No pre-termination or surrender of fully paid plans are considered in determining the PNR of fully paid plans.
- i. Any excess in the amount of the trust fund as a result of the initial adoption of the revised reserving method is not released from the fund nor credited/offset to future required contributions.
- j. Individual subsidiary accounts for education plans and pension plans are maintained.
- k. To effect a smooth transition in the valuation of reserves for old basket of plans, the IC through its Circular Letter (CL) No. 23-2012, prescribed a Transitory Pre-Need Reserves (TPNR) in 2012. A maximum period of ten (10) years shall be observed in the implementation of the TPNR.

For each of the pre-need plan categories, namely, education, pension and life plans, the TPNR shall be computed annually on all old baskets of plans outstanding on the 31st of December of each year from 2012 to 2021 using the discount interest rates as provided by the IC in its CL. If the actual trust fund balance is higher or equal to the resulting pre-need reserve, then the liability to be set-up shall be the PNR. However, if the resulting pre-need reserve is greater than the actual trust fund balance at the end of the year, the TPNR shall be computed in accordance with the schedule provided by the IC.

The TPNR liability based on the schedule provided by the IC shall be recognized and booked each year. The trust fund deficiency shall be funded by the pre-need company within (60) days from April 30 following the valuation date.

Other Reserves

Other reserves are set-up as a prudent measure at the option of the Company. It is the excess between the Actuarial Reserve Liability (ARL) and the PNR. The ARL is computed based on generally accepted actuarial principles.

ARL is the measure of liabilities for its in-force plans or lapsed plans as of valuation date.

Revenue Recognition

The Company recognizes income from sale of pre-need plans, interest from fixed income securities and income from trust fund assets.

Premium revenue

Premium revenue arises from the sale of pre-need plans is recognized as earned when collected. When premiums are recognized as income, the related cost of contracts shall be computed and booked with the result that benefits and expenses are matched with such income.

The amount of premium installments collectible from the planholders is not recognized as receivables in accordance with Pre-Need Rule 31, As Amended: Accounting Standards for Pre-need Plans and PNUCA adopted by the Company on January 1, 2007.

Trust fund income

Trust fund income is recognized when earned and is recognized net of management fees and taxes. This income is restricted to payments of benefits as provided in the pre-need plan contracts.

Investment income

Investment income from a financial asset is recognized when it is probable that the economic benefits will flow to the Company and the amount of income can be measured reliably. Investment income is recognized in profit or loss as it accrues, taking into account the effective yield of the assets or liability or an applicable floating rate. Interest income and expense include the amortization of any discount or other differences between the initial carrying amount of an interest-bearing instrument and its amount at maturity calculated on an effective interest rate basis.

Interest income

Interest income from a financial asset is recognized when it is probable that the economic benefits will flow to the Company and the amount of income can be measured reliably. Interest income is accrued on a time proportion basis, by reference to the principal outstanding and at the effective interest rate applicable, which is the rate that exactly discounts estimated future cash receipts through the expected life of the financial asset to that asset's net carrying amount.

Realized gains or losses

Realized gains or losses on the sale of AFS financial assets are calculated as the difference between the net sales proceeds and the carrying value net of any gains and losses previously accumulated in equity. This is recognized in profit or loss when sales transaction occurred.

Other income

Other income is recognized to the extent that it is probable that the economic benefits will flow to the Company and the income can be measured reliably. Other income includes handling fees, interest on lapsed plan, amendment fees, and miscellaneous income.

Expense Recognition

Expenses are recognized in profit or loss when a decrease in future economic benefit related to a decrease in an asset or an increase in a liability has arisen that can be measured reliably. Expenses are recognized in profit or loss on the basis of: (i) a direct association between the costs incurred and the earning of specific items of income; or (ii) systematic and rational allocation procedures when economic benefits are expected to arise over several accounting periods and the association with income can only be broadly or indirectly determined; or (iii) immediately when an expenditure produces no future economic benefits or when, and to the extent that, future economic benefits do not qualify or cease to qualify for recognition in the statements of financial position as an asset.

Expenses in the statements of comprehensive income are presented using the function of expense method. Cost of contracts issued and other direct costs and expenses are expenses that are associated with the plans sold, and includes the increase or decrease in PNR as at the current year as compared to the provision for the same period of the previous year, amount of trust fund contribution for the year, increase in other reserves and documentary stamp tax and SEC registration fees. General and administrative expenses are costs attributable to administrative, marketing, selling and other business activities of the Company.

Related Party Transactions

A related party transaction is a transfer of resources, services or obligations between the Parent Company and a related party, regardless of whether a price is charged.

Parties are considered related if one party has control, joint control, or significant influence over the other party in making financial and operating decisions. An entity that is a post-employment benefit plan for the employees of the Company and the key management personnel of the Company are also considered to be related parties.

Taxation

Income tax expense represents the sum of current tax expense and final tax.

Current tax

The current tax expense is composed of the regular corporate income tax (RCIT), the minimum corporate income tax (MCIT) and final tax. The RCIT and MCIT are based on taxable profit for the year which may differ from net profit or gross profit as reported in the statements of comprehensive income because it excludes items of income or expense that are taxable or deductible in other years, and it further excludes items that are never taxable or deductible. The RCIT is calculated using 30% of net taxable income and MCIT at 2% of gross income and the tax due for the year is the higher of the RCIT or MCIT.

Final tax

Final tax expense represents final taxes withheld on interest income from cash in banks, special savings deposits and fixed-income securities.

Deferred tax

Deferred tax is recognized on temporary differences between the carrying amounts of assets and liabilities in the financial statements and the corresponding tax bases used in the computation of taxable profit. Deferred tax liabilities are generally recognized for all taxable temporary differences. Deferred tax assets are generally recognized for all deductible temporary differences to the extent that it is probable that taxable profits will be available against which those deductible temporary differences can be utilized. Such deferred tax assets and liabilities are not recognized if the temporary difference arises from the initial recognition (other than in a business combination) of assets and liabilities in a transaction that affects neither the taxable profit nor the accounting profit. In addition, deferred tax liabilities are not recognized if the temporary difference arises from the initial recognition of goodwill.

Deferred tax liabilities are recognized for taxable temporary differences associated with investments in subsidiaries and associates, and interests in joint ventures, except where the Group is able to control the reversal of the temporary difference and it is probable that the temporary difference will not reverse in the foreseeable future. Deferred tax assets arising from deductible temporary differences associated with such investments and interests are only recognized to the extent that it is probable that there will be sufficient taxable profits against which to utilize the benefits of the temporary differences and they are expected to reverse in the foreseeable future.

The carrying amount of deferred tax assets is reviewed at the end of each reporting period and reduced to the extent that it is no longer probable that sufficient taxable profits will be available to allow all or part of the asset to be recovered

Deferred tax liabilities and assets are measured at the tax rates that are expected to apply in the period in which the liability is settled or the asset realized, based on tax rates (and tax laws) that have been enacted or substantively enacted by the end of the reporting period.

The measurement of deferred tax liabilities and assets reflects the tax consequences that would follow from the manner in which the Group expects, at the end of the reporting period, to recover or settle the carrying amount of its assets and liabilities.

Current and deferred tax for the year

Current and deferred tax are recognized in profit or loss, except when they relate to items that are recognized in other comprehensive income or directly in equity, in which case, the current and deferred tax are also recognized in other comprehensive income or directly in equity respectively. Where current tax or deferred tax arises from the initial accounting for a business combination, the tax effect is included in the accounting for the business combination.

Events After the Reporting Period

The Company identifies events after the end of the reporting period as those events, both favorable and unfavorable, that occur between the end of the reporting period and the date when the financial statements are authorized for issue. The financial statements of the Company are adjusted to reflect those events that provide evidence of conditions that existed at the end of the reporting period. Non-adjusting events after the end of the reporting period are disclosed in the notes to the financial statements when material.

6. CRITICAL ACCOUNTING JUDGMENTS AND KEY SOURCES OF ESTIMATION UNCERTAINTY

In the application of the Company's accounting policies, Management is required to make judgments, estimates and assumptions about the carrying amounts of assets and liabilities that are not readily apparent from other sources. The estimates and associated assumptions are based on the historical experience and other factors that are considered to be relevant. Actual results may differ from these estimates.

The estimates and underlying assumptions are reviewed on an ongoing basis. Revisions to accounting estimates are recognized in the period in which the estimate is revised if the revision affects only that period, or in the period of the revision and future periods if the revision affects both current and future periods.

Critical Judgment in Applying Accounting Policies

The following are the critical judgments, apart from those involving estimations, that Management has made in the process of applying the entity's accounting policies and that have the most significant effect on the amounts recognized in financial statements.

Functional currency

Based on the economic substance of the underlying circumstances relevant to the Company, the functional currency of the Company has determined to be the Philippine Peso. The Philippine Peso is the currency of the primary economic environment in which the Company operates. It is the currency that mainly influences the Management in making economic decisions.

Business model assessment

Classification and measurement of financial assets depends on the results of the SPPI and the business model test. The Company determines the business model at a level that reflects how groups of financial assets are managed together to achieve a particular business objective. This assessment includes judgement reflecting all relevant evidence including how the performance of the assets is evaluated and their performance measured, the risks that affect the performance of the assets and how these are managed and how the managers of the assets are compensated. The Group monitors financial assets measured at amortized cost or fair value through other comprehensive income that are derecognized prior to their maturity to understand the reason for their disposal and whether the reasons are consistent with the objective of the business for which the asset was held. Monitoring is part of the Company's continuous assessment of whether the business model for which the remaining financial assets are held continues to be appropriate and if it is not appropriate whether there has been a change in business model and so a prospective change to the classification of those assets.

The Company measures its investment in trust fund financial assets at amortized cost if the financial asset qualifies for both SPPI and business model test. All other financial assets that do not meet the SPPI and business model test are measured at FVTPL and FVTOCI.

The financial assets measured at amortized cost amounted to P391,234,557 and P396,754,932 as at December 31, 2020 and 2019 as disclosed in Note 11.

Models and assumptions used

The Company uses various models and assumptions in measuring fair value of financial assets as well as in estimating ECL. Judgement is applied in identifying the most appropriate model for each type of asset, as well as for determining the assumptions used in these models, including assumptions that relate to key drivers of credit risk.

Key Sources of Estimation Uncertainty

The following are the key assumptions concerning the future and other key sources of estimation uncertainty at the end of each reporting period that have a significant risk of causing a material adjustment to the carrying amounts of assets and liabilities within the next financial year.

Estimating loss allowance for expected credit losses

The Company measures expected credit losses of a financial instrument in a way that reflects an unbiased and probability-weighted amount that is determined by evaluating a range of possible outcomes, the time value of money and information about past events, current conditions and forecasts of future economic conditions. When measuring ECL the Company uses reasonable and supportable forward-looking information, which is based on assumptions for the future movement of different economic drivers and how these drivers will affect each other.

The measurement of the expected credit loss allowance for financial assets measured at amortized cost and FVTOCI is an area that requires the use of complex models and significant assumptions about future economic conditions and credit behavior. Explanation of the inputs, assumptions and estimation techniques used in measuring ECL is further detailed in Note 30 CreditRisk - Expected credit loss measurement, which also sets out the key sensitivities of the ECL to changes in these elements.

A number of significant judgments are also required in applying the accounting requirements for measuring ECL, such as:

- Determining criteria for significant increase in credit risk;
- Choosing appropriate models and assumptions for the measurement of ECL; and
- Establishing the number and relative weightings of forward-looking scenarios and the associated ECL.

As at December 31, 2020 and 2019, Management believes that its receivables are fully recoverable; accordingly, no ECL was recognized in both years.

Receivables from a trustee bank as at December 31, 2020 and 2019 amounted to nil and P29,869,321 respectively as disclosed in Note 8.

Asset impairment

The Company performs an impairment review when certain impairment indicators are present.

Determining the recoverable amount of prepaid taxes and intangible assets, using future cash flows expected to be generated from the continued use and ultimate disposition of such assets, requires the Company to make estimates and assumptions that can materially affect the financial statements. Future events could cause the Company to conclude that its prepaid taxes and intangible assets are impaired. Any resulting impairment loss could have a material adverse impact on the financial condition and results of operations.

The preparation of the estimated future cash flows involves significant judgment and estimations. While the Company believes that its assumptions are appropriate and reasonable, significant changes in the assumptions may materially affect the assessment of recoverable values and may lead to future impairment charges.

The accumulated impairment loss on prepaid taxes amounted to P20,687,057 and P20,198,158 as at December 31, 2020 and 2019, respectively, since Management believes that no tax benefit can be recovered in the future on these prepaid taxes, as disclosed in Note 9.

Deferred tax assets

The Company reviews the carrying amount at the end of each reporting period and reduces deferred tax asset to the extent that it is no longer probable that sufficient taxable profit will be available to allow all or part of the deferred tax assets to be utilized. However, there is no assurance that the Company will generate sufficient taxable profit to allow all or part of its deferred tax assets to be utilized.

As at December 31, 2020 and 2019, deferred tax asset on net operating loss carry-over (NOLCO) amounting to P547,698,869 and P431,480,720, respectively, was not recognized in the statements of financial position because Management believes it is more likely that the Company will not be able to realize the tax benefit arising from NOLCO, as disclosed in Note 27.

Determining fair value of financial instruments

The Company carries Financial Assets at FVTPL, financial assets at FVTOCI and its AFS financial assets, including those from its trust funds, at fair value. While significant components of fair value measurement were determined using verifiable objective evidence, i.e., quoted price or interpolated yields derived from benchmark rates, the amount of changes in fair value would differ if the Company utilized different valuation methodology. Any changes in fair value of these financial assets would directly affect equity.

As at December 31, 2020 and 2019, the carrying amount of FVTOCI and FVTPL assets amounted to P297,689,820 and P272,502,360 and P15,737,744 and P15,099,104, respectively as disclosed in Note 10 while the related fair value adjustments amounted to net gain of P27,490,780 and P53,381,372, respectively, as disclosed in Note 10.

As at December 31, 2020 and 2019, the carrying amounts of FVTOCI, FVTPL and amortized cost financial assets in its investments in trust funds amounted to P4,997,331,152, P302,521,845 and P391,234,557 and P4,758,818,342, P285,715,931 and P396,754,932, respectively, as disclosed in Note 11, while the related gains on fair value adjustments amounted to P279,688,450 in 2020 and P290,301,830 in 2019, as disclosed in Note 20.

Estimating PNR and other reserves

PNR and other reserves are set up for all pre-need benefits guaranteed and payable by the pre-need company as defined in the pre-need education and pension plan contracts. By definition, it is an estimation of the Company's present obligation to its planholders at a particular valuation date, and considers the value of future plan benefits and the contribution to reserves in the calculation. The Company is guided by existing regulatory rules/circulars and generally accepted actuarial principles in the calculation of PNR and other reserves. It uses assumptions based on Company's experience. These actuarial assumptions include interest rate, surrender and lapse rate, reinstatement rate and other assumptions necessary to estimate the reserve requirements. The valuation data file includes inforce, paid up and lapsed plans. Calculations are done per planholder; a reinstatement rate assumption is used to determine the reserves for lapsed plans.

The carrying amount of PNR as at December 31, 2020 and 2019 amounted to P5,324,268,274 and P5,606,741,774, respectively, as disclosed in Note 15.

Contingencies

The Company is currently involved in various legal proceedings and tax assessments, as disclosed in Note 28. Estimates of probable costs for the resolution of these claims have been developed in consultation with external counsel handling the defense in these matters and are based upon an analysis of potential results. The Company currently does not believe these proceedings will have a material adverse effect on the financial position. It is possible, however, that future results of operations could be materially affected by changes in the estimates or in the effectiveness of the Company's strategies relating to these proceedings.

7. CASH AND CASH EQUIVALENTS

Cash and cash equivalents consist of:

	2020	2019
Cash on hand and in banks	P120,816,845	P 19,473,436
Cash equivalents	6,600,000	386,600,000
	P127,416,845	P406,073,436

Cash equivalents are short-term, highly liquid investments that are readily convertible to known amounts of cash with maturities of three (3) months or less from the date of acquisition and are subject to an insignificant risk of change in value.

Cash in banks earned interest at the respective bank deposit rates ranging from 0.03% to 0.50% in 2020 and 0.03% to 0.75% in 2019. Cash equivalents represent short-term deposits varying from one day to two months depending on the cash requirements of the Company, and earn annual interest rates ranging from 1.00% to 3.625% in 2020 and 1.00% to 6.5% in 2019. Interest income from cash in banks and cash equivalents amounted to P2,098,910 and P9,411,615 in 2020 and 2019, respectively, as disclosed in Note 25.

As at December 31, 2020 and 2019, the Company maintains its cash deposits in commercial and universal banks with good credit standing to minimize exposure to credit risk.

8. RECEIVABLES

Receivables consist of:

	2020	2019
Accrued interest	P3,075,242	P 3,200,860
Receivables from a trustee bank	-	29,869,321
Other receivables	663,727	692,336
	P3,738,969	P33,762,517

Receivables from a trustee bank pertain to amounts paid in advance by the Company on trust fund withdrawals made by certain planholders owning interests in the trust being held by Banco de Oro (BDO) trust fund. This amount is non-interest bearing and due immediately.

Accrued interest pertains to interest receivable on cash in banks, cash equivalents, and FVTOCI financial assets.

The Company believes that these receivables are not impaired since there is no change in their credit quality.

9. PREPAYMENTS AND OTHER CURRENT ASSETS - net

The details of the Company's prepayments and other current assets are shown below:

	2020	2019
Prepaid taxes	P20,687,057	P20,198,158
Less: Allowance for non-recoverable prepaid taxes	20,687,057	20,198,158
	-	-
Prepaid expenses	81,224	66,846
Input VAT	8,168	11,632
	P 89,392	P 78,478

Movements in the allowance for non-recoverable prepaid taxes are as follows:

	Note	2020	2019
Balance, beginning		P20,198,158	P19,228,958
Additions	24	488,899	969,200
Balance, ending		P20,687,057	P20,198,158

The Company provided valuation allowance for impairment on these prepaid taxes (creditable withholding taxes) amounting to P20,687,057 and P20,198,158 as at December 31, 2020 and 2019, respectively, because Management believes that the Company will not be able to avail of the tax benefit arising from these prepaid taxes in the future.

Prepaid expenses include prepaid license renewals, prepaid documentary stamp tax and other local business taxes.

Input VAT is net of output VAT as at December 31, 2020 and 2019, amounting to P218,758 and P242,543 respectively.

10. FINANCIAL ASSETS

The Company's financial assets consist of:

A. Financial assets at fair value through other comprehensive income (FVTOCI)

	2020	2019
Investments in government securities	P297,689,820	P272,502,360

The movements in FVTOCI financial assets are as follows:

	Note	2020	2019
Balance, beginning		P272,502,360	P221,309,820
Net premium amortization		(2,303,320)	(2,188,832)
Fair value adjustments	20	27,490,780	53,381,372
Balance, ending		P297,689,820	P272,502,360

The account is composed of the following investments:

	Note	2020	2019
Cost			
Investments in government securities		P269,270,218	P271,573,537
		269,270,218	271,573,537
Accumulated fair value adjustments	20	28,419,602	928,823
		P297,689,820	P272,502,360

B. Financial assets at fair value through profit and loss (FVTPL)

	2020	2019
Investments in mutual fund	P P15,737,744	P15,099,104

The movements in FVTPL financial assets are as follows:

	2020	2019
Balance, beginning	P15,099,104	P13,573,927
Fair value adjustments	638,640	1,525,177
Balance, ending	P15,737,744	P15,099,104

The account is composed of the following investments:

	2020	2019
Cost		
Investments in mutual funds	P 7,738,818	P 7,738,818
Accumulated fair value adjustments	7,998,926	7,360,286
	P15,737,744	P15,099,104

The interest income, including amortization of discount and premium on government securities in 2020 and 2019 amounted to P14,992,820 and P15,993,845, respectively as disclosed in Note 25.

The Company's investment in mutual fund pertain to investment in Sun Life Prosperity Bond Fund, Inc. for a total of P4,908,841 shares with a net asset value of P15,737,744 and P15,099,104 as at December 31, 2020 and 2019, respectively.

No disposals of investments in government securities and mutual fund were made in 2020 and 2019.

The fair values of these financial assets are based on quoted market prices. The revaluation of these investments resulted in a net gain of P27,490,780 in 2020 and a net gain of P53,381,372 in 2019, as disclosed in Note 20.

11. TRUST FUNDS

The Company has trust funds which are being administered by Banco de Oro Unibank, Inc. (BDO). These trust funds are for the fulfilment of the Company's obligations on outstanding pre-need contracts. In compliance with the rules and regulations of the SEC which were adopted by the IC and in accordance with the terms of the trust agreements, withdrawals from the trust funds are limited to payments of pre-need plan benefits, bank charges and investment expenses for the operation of the trust funds, termination value paid to planholders and final taxes on investment income of the trust funds, among others.

As mandated by the IC, an actuarial valuation of the adequacy of the trust funds shall be submitted to the IC within 120 days after the end of every fiscal year of the Company. Any deficiency in the trust funds shall be funded within 30 days after receipt of notice of deficiency from the IC.

As at December 31, 2020 and 2019, the Company's trust funds and the required PNRs are as follows:

Type of Pre-need Product	Trust Fund Equity	Pre-need Reserves	Excess	Staggered Recognition of Trust Fund Deficiency	Transitory Pre-need Reserves
		(Note 15)		(Note 15)	
2020					
Education	P2,039,525,808	P1,983,625,033	P 55,900,775	P-	P1,983,625,033
Pension	3,527,733,060	3,340,643,241	187,089,819	-	3,340,643,241
	P5,567,258,868	P5,324,268,274	P242,990,594	P-	P5,324,268,274
2019					
Education	P2,141,557,803	P2,206,284,730	(P 64,726,927)	P21,575,642	P2,163,133,445
Pension	3,431,034,623	3,468,755,740	(37,721,117)	12,573,706	3,443,608,329
	P5,572,592,426	P5,675,040,470	(P102,448,044)	P34,149,348	P5,606,741,774

In 2020 and 2019, Trust Fund Equity shown above is based on trust fund financial statements after adjustment on receivable from a trustee bank and amounts on deposit and benefits payable not yet withdrawn from the trust fund.

As at December 31, 2020, the trust fund equity is higher than the pre-need reserve and is sufficient.

As at December 31, 2019, in accordance with IC CLNo. 23-2012, the amount that would be funded is one-third of the total deficiency amounting to P21,575,642 for the Education segment, and P12,573,706 for the Pension segment. The Company subsequently contributed P34,300,000 in February 2020 to cover the trust fund deficiency.

Total contributions to the trust funds amounted to P116,110,786 and P283,594,066 in 2020 and 2019, respectively, as disclosed in Note 15.

The details of the adjusted trust funds are as follows:

Statements of financial position

	2020			2019
	Pension	Education	Total	
Assets				
Cash and cash equivalents	P 36,435,434	P 23,681,510	P 60,116,944	P 71,883,819
Financial assets at amortized cost	391,234,557	-	391,234,557	396,754,932
Financial assets at FVTOCI	3,094,047,147	1,903,284,005	4,997,331,152	4,758,818,342
Financial assets at FVTPL	87,232,961	215,288,884	302,521,845	285,715,931
Interest receivable	51,799,645	23,406,956	75,206,601	75,633,769
Other assets	92,278	196,418	288,696	471,376
	3,660,842,022	2,165,857,773	5,826,699,795	5,589,278,169
Liabilities				
Accrued expenses and other liabilities	943,101	559,846	1,502,947	1,445,995
	P 3,659,898,921	P 2,165,297,927	P 5,825,196,848	P 5,587,832,174
Equity				
Fund balance, beginning	(P1,557,341,882)	P 477,820,546	(P1,079,521,336)	(P 236,863,824)
Additional contributions	81,127,196	34,983,590	116,110,786	283,594,066
Withdrawals	(201,461,484)	(194,563,432)	(396,024,916)	(1,126,251,578)
Trust fund contributions - net	(120,334,288)	(159,579,842)	(279,914,130)	(842,657,512)
Fund balance, ending	(1,677,676,170)	318,240,704	(1,359,435,466)	(1,079,521,336)
Reserve for fluctuation FVTOCIs	607,919,756	356,565,714	964,485,470	684,797,021
Accumulated trust fund income, beginning	4,571,920,545	1,410,635,944	5,982,556,489	5,701,397,301
Trust fund income - net	157,734,790	79,855,565	237,590,356	281,159,188
Accumulated trust fund income, ending	4,729,655,335	1,490,491,509	6,220,146,844	5,982,556,489
	P 3,659,898,921	P 2,165,297,927	P 5,825,196,848	P 5,587,832,174

Statements of comprehensive income

	2020			2019
	Pension	Education	Total	
Income	P 168,779,200	P 86,714,931	P 255,494,131	P 299,013,061
Expenses	11,044,410	6,859,365	17,903,775	17,853,873
Net income	P 157,734,790	P 79,855,566	P 237,590,356	P 281,159,188

The following table presents the maturity profile of the principal amounts of the financial asset at FVTOCI under trust fund assets as at December 31, 2020:

	2020	2019
Due within one year	P 71,400,000	P 238,787,066
Due after one year through five years	930,523,467	1,112,836,408
Due after five years and above	3,155,545,549	3,950,068,643
	P4,157,469,017	P5,301,692,117

FVTOCI investments of the trust funds include investments in treasury notes and bonds measured at fair values based on quoted prices of either done deals or bid rates or based on interpolated yields derived from benchmark reference rates. The revaluation of these investments resulted in a loss on fair value measurement amounting to P279,688,449 and gain of P290,301,830 in 2020 and 2019, as disclosed in Note 20.

In 2020 and 2019, reclassification of fair value adjustments from trust fund equity to profit or loss relating to FVTOCI investments of the trust funds disposed during the year resulted in a loss of nil in 2020 and P320,155,839 in 2019, as disclosed in Note 20.

On June 30, 2011, the Company sold a significant portion of its HTM investments in the trust funds to meet liquidity requirements for maturing plans during the year. As a result, the remaining HTM portfolio was reclassified into AFS category. The financial assets reclassified from HTM to AFS category consist of government securities in the form of fixed rate treasury notes. These securities have a maturity profile of at least five (5) years.

On January 1, 2018, the Company has adopted the PFRS 9 which resulted in the reclassification of these AFS investments into financial assets through other comprehensive income and financial assets through profit and loss.

In 2014, the two-year period subsequent to the reclassification from HTM to AFS category has passed. No reclassification of AFS investments back to HTM investments was made from 2015 to 2017. The Company will continue to perform an assessment of the appropriate classification of its investment for the subsequent years.

Pursuant to Section 36 of the Implementing Rules and Regulations (IRR) of Republic Act No. 9829, otherwise known as the Pre-need Code of the Philippines, the IC issued guidelines on the Management of the Trust Fund of the Pre-need Corporation which supersede Sections 16 and 74 of Republic Act No. 8799 dated March 8, 2010. The significant provisions of the IC's New Rules relating to investments in trust funds as amended are as follows:

1. Fixed income instruments - These may be classified into short-term and long-term instruments. The instrument is short-term if the term to maturity is 365 days or less. This category includes:
 - a. Government securities which shall not be less than 10% of the trust fund amount;
 - b. Savings/time deposits and unit investment trust funds maintained with and managed by a duly authorized bank with satisfactory examination rating as of the last examination by the Bangko Sentral ng Pilipinas (BSP);
 - c. Commercial papers duly registered with the SEC with a credit rating of "1" for short term and "AAA" for long term based on the rating scale of an accredited Philippine Rating Agency or its equivalent at the time of investment, provided that, the maximum exposure to long-term commercial papers shall not exceed 15% of the total trust fund amount while the exposure to each commercial paper issuer shall not exceed 10% of the allocated amount; and
 - d. Direct loans to corporations which are financially stable, profitable for the last three (3) years and have a good track record of paying their previous loans.

These loans shall be fully secured by a real estate mortgage up to the extent of 60% of the zonal valuation of the property at the time the loan was granted.

The property shall be covered by a transfer certificate of title registered in the name of the mortgagor and free from liens and encumbrances.

The maximum amount to be allocated for direct loans shall not exceed 5% of the total trust fund amount while the amount to be granted to each corporate borrower shall not exceed 10% of the amount allocated.

The maximum term of the loan should be no longer than four (4) years.

Direct loans to planholders are exempt from the limitations set forth under this Section, provided that such loans to planholders shall not exceed 10% of the total trust fund amount.

2. Equities - Investments in equities shall be limited to stocks listed on the main board of the local stock exchange. Investments in duly registered collective investment instruments such as mutual funds are allowed hereunder, provided that such funds are invested only in fixed income instruments and blue chips securities, subject to the limitations prescribed by laws, rules and regulations. These investments shall include stocks issued by companies that are financially stable, actively traded, possess good track record of growth and have declared dividends for the past three (3) years. Notwithstanding the prohibition against transactions with directors, officers, stockholders and related interests, the trustee may invest in equities of companies related to the trustee provided these companies comply with the foregoing criteria provided in this paragraph for equity investments.

The amount to be allocated for this purpose shall not exceed 30% of the total trust fund while the investment in any particular issue shall not exceed 10% of the allocated amount. The investment shall be recorded at the aggregate of the lower of cost or market.

Existing investments which are not in accordance herewith shall be disposed of within three (3) years from the effectivity of the Pre-need Code.

3. Real Estate - These shall include real estate properties located in strategic areas of cities and first class municipalities. The transfer certificate of title (TCT) shall be in the name of the seller, free from liens and encumbrances and shall be transferred in the name of the trustee in trust for the planholders unless the seller/transferor is the pre-need company wherein an annotation to the TCT relative to the sale/transfer may be allowed. It shall be recorded at acquisition cost.

However, the real estate shall be appraised every three (3) years by a licensed real estate appraiser, accredited by the Philippine Association of Real Estate Appraisers, to reflect the increase or decrease in the value of the property. In case the appraisal would result in an increase in the value, only 60% of the appraisal increase is allowed to be recorded in the books of the trust fund but in case of decline in value, the entire decline shall be recorded. Appraisal increment should not be used to cover-up the required monthly contribution to the trust fund.

The total recorded value of the real estate investment shall not exceed 10% of the total trust fund amount of the pre-need company. In the event that the existing real estate investment exceeds the aforesaid limit, the same shall be leveled off to the prescribed limit within three (3) years from the effectivity of the Pre-need Code. Investment of the trust fund, which is not in accordance with the preceding paragraphs, shall not be allowed unless the prior written approval of the Commission had been secured. Provided further, that no deposit or investment in any single entity shall exceed 15% of the total value of the trust fund. Provided finally, that the Commission is authorized to adjust the percentage allocation per category set forth herein not in excess of 2% points upward or downward and no oftener than once every five (5) years. The first adjustment hereunder may be made no earlier than five (5) years from the effectivity of the Pre-need Code. The pre-need company shall not use the trust fund to extend any loan to or to invest in its directors, stockholders, officers or its affiliates.

The Company has fully complied with all the implementing guidelines of the abovementioned IRR. The final amount of non-admitted assets can be determined only after the investments in trust funds have been examined by the IC.

12. BENEFITS PAYABLE AND ACCRUED EXPENSES AND OTHER LIABILITIES

Benefits Payable

Benefits payable amounting to P182,510,551 and P118,534,046 as at December 31, 2020 and 2019, respectively, represents amounts due to planholders and beneficiaries, in the course of settlement and incurred but unpaid claims on the pre-need contracts, such as due but unpaid matured benefits, surrender benefits and annuity payments.

Accrued Expenses and Other Liabilities

	2020	2019
Payable to agents	P 1,593,513	P2,401,104
Accrued final taxes	615,048	640,172
Accrued general expenses	406,341	405,326
Withholding taxes	53,716	52,702
Other liabilities	7,661,571	2,203,180
	P10,330,189	P5,702,484

The Company's liabilities are not subject to interest charges.

Details of accrued general expenses are composed mainly of accrued professional fees.

Details of other liabilities are as follows:

	2020	2019
Bank credits	P6,772,330	P1,313,939
Trustee fees	889,241	889,241
	P7,661,571	P2,203,180

As at December 31, 2020 and 2019, output VAT is net of input VAT of P226,926 and P254,175, respectively as disclosed in Note 9.

13. COUNSELORS' BOND RESERVE

Counselors' bond reserve amounting to P864,251 and P6,978,265 as at December 31, 2020 and 2019, respectively, represents the aggregate amount of deductions from agents' commissions, bonuses and other cash incentives. Upon separation of an agent from the Company, the agent's accountability will be deducted from the accumulated bond reserve upon securing of approved and updated clearance from the Licensing section.

In 2020, the Company wrote off long outstanding liabilities amounting to P6,114,014. The write off was recorded under Other Income in Note 26.

14. RELATED PARTY TRANSACTIONS

The Company has the following transactions and outstanding balances with the parent company as at and for the years ended December 31:

Category	Amounts	Outstanding Balance		Terms	Conditions	Notes
		Receivable	Payable			
2020						
Parent Company						
Chargeback	P21,400,878	P -	P -	30-day: non-interest bearing, settled in cash	Unsecured	a
Premiums	342,091	-	3,251,694	30-day: non-interest bearing, settled in cash	Unsecured	b
2019						
Parent company						
Chargeback	P 22,368,322	P -	P -	30-day: non-interest bearing settled in cash	Unsecured	a
Premiums	439,627	-	3,397,171	30-day: non-interest bearing settled in cash	Unsecured	b

- a. The Company has transactions with SLOCPI which consist mainly of intercompany billings to cover shared costs and operating expenses such as systems, operations, human resources, legal and internal audit functions and others, which are being settled in cash on or before the 30th day of each month.
- b. Other pre-need plans (educational and pension plans) have embedded credit life and credit disability benefits which are insured by SLOCPI. Outstanding balances are included as part of payable to parent company.

The remuneration of key management personnel is provided by SLOCPI.

15. PRE-NEED RESERVES (PNR)

Movements in the Company's PNR are as follows:

	Note	2020	2019
PNR, Beginning		P5,606,741,774	P5,639,981,406
Trust fund contributions	22	68,519,458	79,363,276
Decrease in PNR	22	(350,992,958)	(112,602,908)
		(282,473,500)	(33,239,632)
PNR, Ending		P5,324,268,274	P5,606,741,774

In its CL No. 23-2012, Valuation of Transitory Pre-Need Reserve (TPNR,) dated November 28, 2012, the IC required the use of the lower of attainable rates of 6%, but provides for TPNR which allows the staggered recognition of the excess of PNR over the amount of the trust funds over ten (10) years. The amount of PNR deficiency in accordance with the CL as at December 31, 2020 and 2019 is amounting to nil and P34,149,348, respectively, as disclosed in Note 11.

In 2020 and 2019, the Company applied the lower of the attainable rates of 6% and availed of the staggered recognition of the excess of PNR over trust fund assets. In 2020, the Company used interest rate assumptions determined and provided by the Company's trustee bank of 5.6% for Sun Education (Non-Par), 5.3% for Sun Pension (Non-Par), 5.6% for Sun Education Plus (Par) and 6.1% for Sun Pension Plus (Par). In 2019, the interest rates were set at 5.6% for Sun Education (Non-Par), 5.5% for Sun Pension (Non-Par), 5.7% for Sun Education Plus (Par) and 6.6% for Sun Pension Plus (Par).

Details of PNR per product type are as follows:

	Note	2020	2019
Education		P1,983,625,033	P2,163,133,445
Pension		3,340,643,241	3,443,608,329
	11	P5,324,268,274	P5,606,741,774

The PNR, before availing the staggered recognition of the deficiency, are summarized based on payment status as follows:

	PNR*	ARL
2020		
Currently-being-paid education and pension plans	P 573,603,364	P 446,290,482
Lapsed plan within allowable reinstatement period	14,734,402	39,954,759
Fully paid education and pension plans	4,735,930,508	4,549,890,460
	P5,324,268,274	P5,036,135,701
2019		
Currently-being-paid education and pension plans	P 619,117,339	P 484,000,381
Lapsed plan within allowable reinstatement period	6,533,873	16,675,814
Fully paid education and pension plans	5,049,389,258	4,809,064,400
	P5,675,040,470	P5,309,740,595

*Based on full amount of PNR and without considering the staggered recognition of deficiency of trust fund over reserves as provided in IC CL No. 23-2012.

The PNR for each individual subsidiary account of each type of plans are determined as follows:

- a. Currently-Being-Paid Education and Pension Plans
 1. Provision for termination values was determined by applying the surrender rate experience of the Company.
 2. Liability was set-up for the portion of currently-being-paid plans that will reach full payment, applying the full payment experience of the Company. It is equivalent to the present value of future maturity benefits reduced by the present value of future trust fund contributions required per Product Model discounted using the appropriate discount rate.

Withdrawal rate of currently-being-paid plans is based on the average of 3-year Company withdrawal experience, if available; otherwise, this is based on the recent Company persistency studies or pricing assumptions.

Type of Pre-need Product	PNR	ARL
December 31, 2020		
Education non-par	P 5,094,006	P 4,844,571
Education par	10,926,298	10,692,947
Pension non-par	532,647,329	405,610,924
Pension par	24,935,731	25,142,040
	P573,603,364	P446,290,482
December 31, 2019		
Education non-par	P 6,979,668	P 6,471,160
Education par	13,488,629	12,928,486
Pension non-par	574,977,486	440,916,924
Pension par	23,671,556	23,683,811
	P 619,117,339	P 484,000,381

b. Lapsed Plan within Allowable Reinstatement Period

The provision for termination values was determined by applying the reinstatement experience of the Company. The Company used reinstatement factor of 60% in 2020 and 2019. Based on the 3-year Company reinstatement experience, the percentage of lapsed plans during previous year which were reinstated within the current year is around 49.1% and 49.2% in 2020 and 2019, respectively.

Type of Pre-need Product	PNR	ARL
December 31, 2020		
Education non-par	P 333,683	P 716,734
Education par	937,959	2,391,170
Pension non-par	12,242,204	34,120,592
Pension par	1,220,556	2,726,263
	P14,734,402	P39,954,759
December 31, 2019		
Education non-par	P 333,322	P 848,996
Education par	510,422	1,405,187
Pension non-par	3,706,922	10,054,113
Pension par	1,983,207	4,367,518
	P 6,533,873	P16,675,814

PNR for lapsed plans are computed as Plan Termination Value multiplied by the reinstatement factor while ARL for lapsed plans are computed as higher of actuarial reserves as of lapsed date multiplied by the reinstatement factor or the plan termination value.

c. Fully Paid Education and Pension Plans

Type of Pre-need Product	PNR	ARL
December 31, 2020		
Education non-par	P1,290,332,746	P1,251,143,001
Education par	676,000,341	667,212,069
Pension non-par	2,303,249,113	2,163,543,761
Pension par	466,348,308	467,991,629
	P4,735,930,508	P4,549,890,460
December 31, 2019		
Education non-par	P1,466,965,027	P1,403,429,399
Education par	718,007,662	700,126,698
Pension non-par	2,380,806,620	2,221,898,354
Pension par	483,609,949	483,609,949
	P5,049,389,258	P4,809,064,400

The actual trust fund contributions per books amounting to P68,519,458 and P79,363,276 in 2020 and 2019, respectively, are less than the P116,110,786 and P283,594,066 total contributions per bank, as disclosed in Note 11, due to additional deposits made in 2020 and 2019 to fund the PNR computed on a monthly valuation basis done by the Company. Reconciliation is as follows:

	Note	2020	2019
Trust Fund Contributions Per Books		P 68,519,458	P 79,363,276
Adjustments		-	37,866
Trust fund contributions in December 2018, deposited on January 2, 2019		-	3,937,098
Trust fund contributions in December 2019, deposited on January 22, 2020		3,744,174	(3,744,174)
Trust fund contributions in December 2020, deposited on January 3, 2021		(3,052,846)	-
Additional deposit to education in February 2019		-	70,000,000
Additional deposit to pension in February 2019		-	134,000,000
Additional deposit to education in February 2020		21,700,000	-
Additional deposit to pension February 2020		12,600,000	-
Double deposit to pension by bank		12,600,000	-
Trust Fund Contributions Per Bank	11	P 116,110,786	P283,594,066

16. PLANHOLDERS' DEPOSITS

Planholders' deposits amounting to P34,443,942 and P29,875,807 as at December 31, 2020 and 2019, respectively, represents amounts received from the planholders for excess fractional payments of a regular installment, and payments received with application for the reinstatement of lapsed plans within two (2) years from the date of lapse, pending the approval of the Company.

17. SHARE CAPITAL

The details of the share capital as at December 31, 2020 and 2019 are as follows:

	Ordinary Share Capital	Preferred Share Capital
Authorized:		
3,000,000 ordinary shares at P25 per share	P75,000,000	P -
2,000,000 preference shares at P25 per share	-	50,000,000
Issued, fully paid and outstanding:		
3,000,000 ordinary shares at P25 per share	75,000,000	-
2,000,000 preference shares at P25 per share	-	50,000,000

There were no movements in the share capital of the Company in 2020 and 2019.

Ordinary shares carry one vote per share and carry a right to dividends. The holders of preference shares have carry one vote per share. The preferred shares may be redeemed at the option of the Company, subject to the approval of the Board of Directors (BOD) of the Company.

18. ADDITIONAL PAID-IN CAPITAL

After the approval by the majority of the BOD and by the vote of the shareholders owning or representing at least two-thirds (2/3) of the outstanding share capital at the shareholders' meeting held on July 29, 2010, the SEC approved the decrease in authorized share capital of the Company on December 3, 2010 from P700,000,000 divided into 5,000,000 ordinary and 2,000,000 preference shares both with par value of P100 each, to P125,000,000 divided into 3,000,000 ordinary and 2,000,000 preference shares both with P25 par value.

19. CONTRIBUTED SURPLUS

On June 3, 2010, the BOD of SLOCPI approved a capital infusion of P200,000,000 into the Company, by way of contributed surplus. The initial infusion of P25,000,000 out of the said authorized amount of P200,000,000 was contributed into the Company on June 29, 2010. In June 2018, SLOCPI infused the remaining P175,000,000 to meet the minimum paid up capital requirement.

On December 4, 2018, the BOD of SLOCPI approved a capital infusion of P500,000,000 into the Company, out of the approved infusion of P500,000,000, P200,000,000 was infused to the Company on December 18, 2018. The Company's management was given the authority to determine when the subsequent infusions shall be made as it deems necessary.

20. INVESTMENT REVALUATION RESERVES

The movements of net unrealized gain on fair value measurement are as follows:

	Notes	2020	2019
Balance, beginning		P 685,725,843	P 21,886,802
Net gains on fair value measurement			
Financial assets at FVTOCI	10	27,490,780	53,381,372
Investments in trust funds	11	279,688,449	290,301,830
Reclassification adjustments relating to disposed financial assets during the year - Investments in trust funds	11	-	320,155,839
		307,179,229	663,839,041
Balance, ending		P992,905,072	P685,725,843

The summary of investment revaluation reserves is as follows:

	Notes	2020	2019
FVTOCI/Available-for-sale financial assets	10	P 28,419,602	P 928,823
Trust funds	11	964,485,470	684,797,020
		P992,905,072	P685,725,843

21. PREMIUM REVENUE

Premium revenue amounting to P89,182,159 and P105,206,379 in 2020 and 2019, respectively, pertains to amount collected during the year from the remaining contracts of planholders.

Amount of premium installments collectible from the planholders are not recognized as receivables in accordance with Pre-need Rule 31, As Amended: Accounting Standards for Pre-need Plans and PNUCA adopted by the Company on January 1, 2007.

22. DECREASE IN PRE-NEED RESERVES - net

The account comprises of:

	Notes	2020	2019
Trust fund contribution	15	P 68,519,458	P 79,363,276
Decrease in other reserves		-	(333,594,666)
Decrease in PNR	15	(350,992,958)	(112,602,908)
		(282,473,500)	(366,834,298)
Documentary stamp taxes and SEC registration fees		185,618	219,419
		(P282,287,882)	(P 366,614,879)

23. OTHER DIRECT COSTS AND EXPENSES

The Company's direct costs and expenses consist of:

	2020	2019
Planholders' benefits	P 739,921,666	P1,061,219,449
Agents' bonuses	1,517,828	2,146,501
Basic commissions	1,278,774	2,108,715
Marketing and sales	50,773	4,915
	P 742,769,041	P1,065,479,580

Planholders' benefits pertain to benefits of planholders and their beneficiaries, paid and accrued upon plan maturity. The total number of plans that matured in 2020 and 2019 was 1,256 and 1,964, respectively.

24. GENERAL AND ADMINISTRATIVE EXPENSES

Details of general and administrative expenses are as follows:

	Notes	2020	2019
Expense chargeback	14	P21,400,878	P22,368,322
Taxes and licenses		1,231,241	1,144,096
Professional fees		712,752	110,285
Provision for non-recoverable prepaid taxes	9	488,899	969,200
Plan insurance	14	342,091	439,627
Bank charges		235,331	212,867
Amortization of computer software		-	5,136,792
Miscellaneous		273,229	23,153
		P24,684,421	P30,404,342

The Company outsources its various administrative functions to SLOCPI, mainly, to focus on core competencies, to drive excellence and execution and to achieve cost savings for the fulfillment of the Company's obligations on outstanding pre-need contracts.

25. INVESTMENT INCOME

The Company's investment income consists of:

	Notes	2020	2019
Interest from:			
Government securities	10	P14,992,820	P15,993,845
Cash in banks and cash equivalents	7	2,098,910	9,411,615
		P17,091,730	P25,405,460

26. OTHER INCOME

The Company's other income consists of:

	Note	2020	2019
Write-off of counselors' bond reserve	13	P6,114,014	P -
Handling fees		1,024,401	1,251,869
Interest on lapsed plan		94,803	314,374
Miscellaneous		722,382	502,810
		P7,955,600	P2,069,053

Handling fees pertain to the handling charges associated with installment payments other than annual basis or spot-cash sales.

The Company write off long outstanding liabilities for counselor's bond reserve as disclosed in Note 13.

Miscellaneous income pertains to the effect of the reconciling items such as banking suspense accounts and stale checks.

27. INCOME TAXES

The provision for income tax of P3,751,299 and P5,213,897 represents the final tax on interest income in 2020 and 2019, respectively.

A reconciliation between income tax expense and the product of accounting loss in 2020 and in 2019 multiplied by 30% is as follows:

	2020	2019
Accounting loss	(P133,345,735)	(P315,428,963)
Tax benefit at 30%	(P40,003,721)	(P 94,628,689)
Adjustment for income subject to lower income tax rate	(1,875,623)	(1,950,187)
Tax effects of:		
Trust fund income - net	(71,277,107)	(84,347,756)
Unrecognized NOLCO	116,218,149	186,357,406
Non-deductible expenses	881,193	240,676
Non-deductible loss (non-taxable gain) from change in fair value of FVTPL financial assets	(191,592)	(457,553)
Provision for income tax	P 3,751,299	P 5,213,897

Details of the Company's NOLCO are as follows:

Year of Incurrence	Year of Expiry	2019 Balance	Additions	Expired	2020 Balance
2017	2020	P 364,088,817	P -	(P 364,088,817)	P -
2018	2021	452,988,890	-	-	452,988,890
2019	2022	621,191,358	-	-	621,191,358
		P 1,438,269,065	P -	(P 364,088,817)	P 1,074,180,248

Pursuant to Section 4 (bbb) of Bayanihan II and as implemented under RR 25-2020, the net operating losses of a business or enterprise incurred for taxable years 2020 and 2021 can be carried over as a deduction from gross income for the next five consecutive taxable years following the year of such loss. The Company's 2020 NOLCO of P387,393,830 is valid until 2025.

The Company did not recognize the deferred tax asset on NOLCO amounting to P547,698,869, and P431,480,720 as at December 31, 2020 and 2019, respectively, because Management believes it is more likely that the Company will not be able to realize the tax benefit arising from NOLCO.

In addition, the Company does not have a deferred tax liability as at December 31, 2020 and 2019.

28. CONTINGENCIES

In the normal course of the Company's operations, there are various outstanding contingent liabilities such as pending legal cases which are not reflected in the Company's financial statements as at December 31, 2020 and 2019. The Company recognizes in its books any losses and liabilities incurred in the course of its operations as they become determinable and quantifiable. In the opinion of the Management and its legal and tax counsels, the Company is not liable to and has strong position on the pending legal cases, but which if decided adversely, will not have a material effect on the Company's financial position and results of operations.

29. FAIR VALUE OF FINANCIAL INSTRUMENTS

Assets and liabilities measured at fair value on a recurring basis.

The following table provides an analysis of financial instruments that are measured subsequent to initial recognition at fair value, grouped into levels 1 to 3 based on the degree to which the fair value is observable.

	Fair value hierarchy		
	2020	2019	
Financial assets at:			
General Fund			
Fair value through profit or loss	P 15,737,744	P 15,099,104	Level 1
Fair value through other comprehensive income	297,689,820	272,502,360	
Trust Fund			
Fair value through profit or loss	302,521,845	285,715,931	
Fair value through other comprehensive income	4,997,331,152	4,758,818,342	Level 1
	P5,613,280,561	P5,332,135,737	

Investments in trust funds pertain to investments in fixed income securities and equity investments.

The fair values of fixed-income securities classified under Level 1 are based on quoted prices of either done deals or bid rates.

Equity investments are valued at quoted prices as at reporting date.

Investments in mutual fund is revalued at market price based on Net Asset Value per Share (NAVPS) provided by Sun Life Asset Management Company, Inc. (SLAMCI) on a monthly basis.

The Company has no Level 2 and 3 financial instruments.

Management believes that these reclassifications and transfers were appropriate.

Assets and Liabilities not Measured at Fair Value

The following financial assets and financial liabilities are not measured at fair value on recurring basis but the fair value disclosure is required:

	2020		2019	
	Carrying Amount	Fair Value	Carrying Amount	Fair Value
Financial Assets				
General Fund				
Cash and cash equivalents	P 127,416,845	P 127,416,845	P 406,073,436	P 406,073,436
Receivables	3,738,969	3,738,969	33,762,517	33,762,517
	131,155,814	131,155,814	439,835,953	439,835,953
Trust Funds				
Cash and cash equivalents	60,116,944	60,116,944	71,883,819	71,883,819
Financial assets at amortized cost	391,234,557	391,234,557	396,754,932	396,754,932
Interest receivable	75,206,601	75,206,601	75,633,769	75,633,769
Other assets	288,696	288,696	471,376	471,376
	526,846,798	526,846,798	544,743,896	544,743,896
	P 658,002,612	P 658,002,612	P 984,579,849	P 984,579,849
Financial Liabilities				
General Fund				
Accrued expenses and other liabilities	P 9,661,425	P 9,661,425	P 5,009,610	P 5,009,610
Benefits payable	182,510,551	182,510,551	118,534,046	118,534,046
Counselors' bond reserve	864,251	864,251	6,978,265	6,978,265
Payable to parent company	3,251,694	3,251,694	3,397,171	3,397,171
Planholders' deposit	34,443,942	34,443,942	29,875,807	29,875,807
	230,731,863	230,731,863	163,794,899	163,794,899
Trust Funds				
Accrued expenses and other liabilities	1,502,947	1,502,947	1,445,995	1,445,995
	P 232,234,810	P 232,234,810	P 165,240,894	P 165,240,894

The difference between the carrying amount of the accrued expenses and other liabilities disclosed in the statements of financial position and the amount disclosed in this note pertains to payables to government that are not considered as financial liabilities.

Due to the short-term maturities of cash and cash equivalents, receivables, accrued expenses and other liabilities, counselors' bond reserve, payable to parent company and benefits payable, their carrying amounts approximate their fair values.

30. RISK MANAGEMENT

The Company's overall risk management framework establishes policies, operating guidelines, risk tolerance limits and practices for risk management patterned after the Company's parent organization. It provides oversight to the risk management activities within the Company's business segments, ensuring that discipline and consistency are applied to the practice of risk management.

The Company's activities expose it to a variety of financial risks (such as market risk, interest rate risk, credit risk and liquidity risk) and operational risks (such as product design and pricing risk and legal, regulatory and market conduct risk management).

Risk Framework

The risk management program is designed to:

- avoid risks that could materially affect the value of the Company;
- contribute to sustainable earnings;
- take risks that the Company can manage in order to increase returns; and

- provide transparency of the Company's risks through internal and external reporting.

The Company is in the business of accepting risks for appropriate return and takes on those risks that meet its objectives. The program design aligns risk management with the Company's vision and strategy and embeds it within its business management practices of the business groups.

In pursuing its business objectives, Management is responsible for ensuring that all significant risks are appropriately identified, assessed, managed, reported and monitored.

Accountability provides clear lines of responsibility and authority for risk acceptance and risk taking. In order for risk management to be effective, all must understand their roles and responsibilities.

The BOD is ultimately responsible for ensuring that risk management policies and practices are in place. The BOD has oversight role with respect to ensuring the identification of major areas of risk and development of strategies to manage those risks, and to review compliance with risk management policies implemented by the Company and with legal and regulatory matters.

Key Risk Processes

The Company has established a formal risk identification program whereby key risks that may impact its business are identified. Exposure to these risks is assessed on a qualitative and quantitative bases. Risk control programs and action plans are established for mitigating the exposure.

The Company has adopted risk management policies to provide a consistent approach to measurement, mitigation and control, and monitoring of risk exposures.

Risk Measurement

The Company has established market risk tolerance limits that set out the maximum target income sensitivity of the Company to change in interest rates and the equity markets.

Risk Categories

The risks facing the Company can generally be classified into the following categories:

Market risk

Market risk arises when there is uncertainty in the valuation of assets and the cost of embedded options and guarantee from changes in equity markets and/or interest rates.

The Company's insurance liabilities are segmented according to major product type, with investment guidelines established for each segment. Exposure to capital market is monitored and managed against established risk tolerance limits. Effects of large and sustained adverse market movement in securities are monitored through Dynamic Capital Adequacy testing and other stress-testing techniques.

a. Interest rate risk

This is the risk of asset-liability mismatch resulting from the interest rate volatility.

To the extent possible, the Company established matching plan for each portfolio of assets and associated liabilities to keep potential losses within acceptable limits.

The Asset Liability Committee measures and monitors interest rate risk using duration analysis.

The sensitivity analyses below were determined based on the Company's investment in fixed income securities classified as AFS securities as of reporting date.

A 100 basis points increase in the yield rate will result to a decrease in equity of P291 million in 2020 and P274 million in 2019.

A 100 basis points decrease in the yield rate will result to an increase in equity of P315 million in 2020 and P296 million in 2019.

The sensitivity analysis is unrepresentative of the inherent interest rate risk because the exposure at the end of the reporting period does not reflect the exposure during the year.

b. Equity price risk

The Company is exposed to equity price risks arising from equity investments. Equity investments are held for strategic purposes. Equity exposure is managed through the limits set by the Pre-Need Code, as well as the allowable equity allocations as stated in the investment management agreement (and subsequent amendments) with the trustee bank. Equity exposure is monitored periodically and reported to the Asset Liability Committee on a quarterly basis.

The sensitivity analyses below have been determined based on the exposure to equity price risks at the reporting date.

If equity prices have been 10% higher or lower, equity reserves would have increased or decreased by P30 million in 2020 and P29 million in 2019, as a result of the changes in fair value of equity investment.

The sensitivity analysis is unrepresentative of the inherent equity price risk because the exposure at the end of the reporting period does not reflect the exposure during the year.

c. Credit risk

The Company has exposure to credit risk from its investments in Philippine government securities and occasionally in the Special Deposit Account (SDA) offered by the BSP. The Company maintains cash deposits in commercial and universal banks with good credit standing to minimize exposure to credit risk.

The table below summarizes the Company's financial assets as at December 31, 2020 and 2019 with a maximum exposure equal to carrying amounts of the financial assets.

	Notes	2020	2019
General Fund			
Cash in banks and cash equivalents	7	P 127,416,845	P 406,073,436
Financial asset at FVTOCI	10	297,689,820	272,502,360
Receivables	8	3,738,969	33,762,517
		428,845,634	712,338,313
Trust Funds			
Cash in bank and cash equivalents	11	60,116,944	71,883,819
Financial asset at amortized cost		391,234,557	396,754,932
Financial assets at FVTOCI		4,997,331,152	4,758,818,342
Interest receivable	11	75,206,601	75,633,769
Other assets		288,696	471,376
		5,524,177,950	5,303,562,238
		P 5,953,023,584	P 6,015,900,551

The following table details the credit quality of those financial assets that are neither past due nor impaired:

	Carrying Amount	Summary Rating	Internal Credit Rating	External Credit Rating	12m or Lifetime ECL
December 31, 2020					
General Fund					
Cash in banks and cash equivalents	P 127,416,845	High	N/A	AAA	Lifetime ECL (simplified approach)
Financial asset at FVTOCI	297,689,820	High	AAA	AAA	12m ECL
Receivables	3,738,969	High	N/A	AAA	Lifetime ECL (simplified approach)
	428,845,634				
Trust Funds					
Cash and cash equivalents	60,116,944	High	N/A	AAA	Lifetime ECL (simplified approach)
Financial assets at amortized cost	391,234,557	High	AAA	AAA	12m ECL
Financial assets at FVTOCI	4,997,331,152	High	AAA	AAA	12m ECL
Interest receivable	75,206,601	High	N/A	AAA	12m ECL
Other assets	288,696	High	N/A	AAA	Lifetime ECL (simplified approach)
	5,524,177,950				
	P 5,953,023,582				
December 31, 2019					
General Fund					
Cash in banks and cash equivalents	P 406,073,436	High	N/A	AAA	Lifetime ECL (simplified approach)
Financial asset at FVTOCI	272,502,360	High	AAA	AAA	12m ECL
Receivables	33,762,517	High	N/A	AAA	Lifetime ECL (simplified approach)
	712,338,313				
Trust Funds					
Cash and cash equivalents	71,883,819	High	N/A	AAA	Lifetime ECL (simplified approach)
Financial assets at amortized cost	396,754,932	High	AAA	AAA	12m ECL
Financial assets at FVTOCI	4,758,818,342	High	AAA	AAA	12m ECL
Interest receivable	75,633,769	High	N/A	AAA	12m ECL
Other assets	471,376	High	N/A	AAA	Lifetime ECL (simplified approach)
	5,303,562,238				
	P 6,015,900,551				

In 2020, the Company uses internal ratings to determine the credit quality of its financial assets. These have been mapped to the summary rating below:

High Grade - applies to highly rated financial obligors, strong corporate counterparties and personal borrowers with whom the Company has excellent repayment experience.

Satisfactory Grade - applies to financial assets that are performing as expected, including recently established businesses.

Acceptable Grade - applies to counterparties with risk profiles that are subject to closer monitoring and scrutiny with the objective of managing risk and moving accounts to improved rating category.

Low Grade - applies to risks that is neither past due nor expected to result in loss but where the Company requires a workout of the relationship unless an early reduction in risk is achievable.

In 2020, the table below summarizes the current internal credit rating equivalence system of the Company:

Summary rating	Internal credit rating	S&P rating
High	AAA	AAA
High	AAA	AA
High	AAA	A
High	AAA	BBB
Satisfactory	AA	BB
Acceptable	B	B
Low	CCC/C	CCC/C

Expected credit loss measurement

PFRS 9 outlines a 'three-stage' model for impairment based on changes in credit quality since initial recognition as summarized below:

- A financial instrument that is not credit-impaired on initial recognition is classified in 'Stage 1' and has its credit risk continuously monitored by the Company.
- If a significant increase in credit risk ('SICR') since initial recognition is identified, the financial instrument is moved to 'Stage 2' but is not yet deemed to be credit-impaired. Please refer to the discussion below on SICR for a description of how the Company determines when a significant increase in credit risk has occurred.
- If the financial instrument is credit-impaired, the financial instrument is then moved to 'Stage 3'. Please refer to the discussion below on credit-impaired and default.
- Financial instruments in Stage 1 have their ECL measured at an amount equal to the portion of lifetime expected credit losses that result from default events possible within the next 12 months. Instruments in Stages 2 or 3 have their ECL measured based on expected credit losses on a lifetime basis.
- A pervasive concept in measuring ECL is that it should consider forward-looking information.

As at December 31, 2020 and 2019, the Company's financial assets are categorized at Stage 1. There are no significant increase in credit risk

Default and events constituting default are disclosed in Note 3.

Measuring ECL – Explanation of inputs, assumptions and estimation techniques

The ECL is measured on either a 12-month (12m) or Lifetime basis depending on whether a significant increase in credit risk has occurred since initial recognition or whether an asset is considered to be credit-impaired. Expected credit losses are the discounted product of the Probability of Default (PD), Exposure at Default (EAD), and Loss Given Default (LGD), defined as follows:

- The PD represents the likelihood of a borrower defaulting on its financial obligation (as per "Definition of default and credit-impaired" above), either over the next 12 months (12M PD), or over the remaining lifetime (Lifetime PD) of the obligation. PD estimates were derived using long-run averages of one-year default rates for borrowers in each risk grade. PD estimates are updated annually.
- EAD is based on the amounts the Company expects to be owed at the time of default, over the next 12 months (12M EAD) or over the remaining lifetime (Lifetime EAD). For example, for a revolving commitment, the Company includes the current drawn balance plus any further amount that is expected to be drawn up to the current contractual limit by the time of default should it occur.

- LGD represents the Company's expectation of the extent of loss on a defaulted exposure. LGD varies by type of counterparty, type and seniority of claim and availability of collateral or other credit support. LGD is expressed as a percentage loss per unit of exposure at the time of default (EAD). LGD is calculated on a 12-month or lifetime basis, where 12-month LGD is the percentage of loss expected to be made if the default occurs in the next 12 months and Lifetime LGD is the percentage of loss expected to be made if the default occurs over the remaining expected lifetime of the loan.

The ECL is determined by projecting the PD, LGD and EAD for each future month and for each individual exposure or collective segment. These three components are multiplied together and adjusted for the likelihood of survival (i.e. the exposure has not prepaid or defaulted in an earlier month). This effectively calculates an ECL for each future month, which is then discounted back to the reporting date and summed. The discount rate used in the ECL calculation is the original effective interest rate or an approximation thereof.

The maturity profile is based on historical observed data and is assumed to be the same across all assets within a portfolio and credit grade band. This is supported by historical analysis.

Forward-looking information incorporated in the ECL models

The assessment of SICR and the calculation of ECL both incorporate forward-looking information. The Company has performed historical analysis and identified the key economic variables impacting credit risk and expected credit losses for each portfolio. The Company assessed that the key economic variables are gross domestic product (GDP) and unemployment rates.

d. Liquidity risk

Liquidity risk refers to the risk that the Company will encounter difficulty in meeting the obligations associated with its financial liabilities that are settled by delivering cash or another financial asset. The Company's objective in managing liquidity risk is to ensure, as far as possible, that it will always have sufficient liquidity to meet its liabilities when due, under both normal and stressed conditions, without incurring unacceptable losses or risking damage to the Company's reputation.

The Company maintains adequate highly liquid assets in the form of cash and cash equivalents amounting to P127,416,845 and P406,073,436 as at December 31, 2020 and 2019, respectively as shown in Note 7. These financial assets have maturities of less than three months to assure necessary liquidity.

The following table details the Company's remaining contractual maturity for its non-derivative financial liabilities. The table has been drawn up based on the undiscounted cash flows of financial liabilities based on the earliest date on which the Company can be required to pay.

	Notes	Within One Year	Beyond One Year	Total
December 31, 2020				
General Fund				
Accrued expenses and other liabilities	12	P 9,661,425	P -	P 9,661,425
Benefits payable	12	182,510,551	-	182,510,551
Counselors' bond reserve	13	864,251	-	864,251
Payable to parent company	14	3,251,694	-	3,251,694
Planholders' deposits	16	-	34,443,942	34,443,942
		196,287,921	34,443,942	230,731,863
Trust Fund				
Accrued expenses and other liabilities	11	1,502,947	-	1,502,947
		P 197,790,868	P 34,443,942	P 232,234,810

December 31, 2019					
General Fund					
Accrued expenses and other liabilities	12	P 5,009,610	P -	P 5,009,610	
Benefits payable	12	118,534,046	-	118,534,046	
Counselors' bond reserve	13	6,978,265	-	6,983,265	
Payable to parent company	14	3,397,171	-	3,397,171	
Planholders' deposits	16	-	29,875,807	29,875,807	
		133,919,092	29,875,807	163,794,899	
Trust Fund					
Accrued expenses and other liabilities	11	1,445,995	-	1,445,995	
		P 135,365,087	P 29,875,807	P 165,240,894	

Financial liabilities presented above exclude amounts payable to government agencies for final taxes, output VAT and withholding taxes, as shown in Note 12.

The summary of the future cash flows representing principal and interest of financial assets under trust funds are as follows:

Product Type	Less than One Month	One to Three Months	Four Months to One Year	Two to Five Years	Above Five Years	Total
December 31, 2020						
Banco De Oro Educ Non Par	P 5,771,977	P 10,985,376	P 82,815,873	P 468,896,548	P 957,553,859	P 1,526,023,633
Banco De Oro-Pension Non Par	12,111,032	23,050,028	107,436,572	930,732,817	2,190,624,630	3,263,955,079
Banco De Oro Educ Par	2,940,992	5,597,371	40,760,162	298,281,006	426,311,838	773,891,369
Banco De Oro-Pension Par	3,938,060	7,495,018	59,418,383	384,510,029	460,627,351	915,988,841
	P 24,762,061	P 47,127,793	P 290,430,990	P 2,082,420,401	P 4,035,117,678	P 6,479,858,921
December 31, 2019						
Banco De Oro Educ Non Par	P 3,700,400	P 47,927,678	P 139,082,493	P 488,099,433	P 756,023,760	P 1,434,833,764
Banco De Oro-Pension Non Par	20,140,000	47,585,620	92,192,620	1,070,063,195	2,189,757,901	3,419,739,336
Banco De Oro Educ Par	2,355,590	27,538,553	44,371,156	312,367,981	368,017,345	754,650,625
Banco De Oro-Pension Par	3,506,972	9,810,690	33,974,778	372,292,561	453,110,282	872,695,283
	P 29,702,962	P 132,862,541	P 309,621,047	P 2,242,823,170	P 3,766,909,288	P 6,481,919,008

The factors affecting the Company's insurance and underwriting risks are described as follows:

a. Legal, regulatory and market conduct risk management

This refers to the risk associated with failure to comply with laws or to conduct business consistent with changing regulatory or public expectations.

The Company promotes strong compliance culture by setting the appropriate tone at the top, with respect to compliance with laws and regulations, and establishes compliance policies and framework. Compliance and legal obligations are monitored and reported to the BOD.

b. Operational risk

This refers to the uncertainty arising from internal events caused by failures of people, process and technology as well as external events.

This is the risk of loss resulting from inadequate or failed internal processes, controls, people and systems. Categories of operational risks may fall under: sales and distribution, human resources, information technology, processes and people, accounting and finance, model risk, legal and regulatory and third party relationships.

The Company ensures that internal controls and practices are consistent with enterprise wide policies supporting the management of operational risks.

The Company has established business specific guidelines. Comprehensive insurance program, including appropriate levels of self-insurance, is maintained to provide protection against potential losses. Environmental risk management program is maintained to help protect investment assets, primarily, whenever applicable, real estate, mortgage, and structured finance portfolios, from losses due to environment issues and to help ensure compliance with applicable laws.

Regulatory Compliance Management

The Compliance Risk Management Framework of Sun Life sets out the framework for the management and mitigation of Compliance Risk that enables the Company to achieve key objectives and make better business decisions, while meeting regulatory and client expectations. Compliance Risk arises from potential non-conformance with laws, rules, regulations, prescribed practices or ethical standards on anti-money laundering and anti-terrorist financing, market conduct, privacy, prevention of bribery and corruption, and related party transactions.

In line with this framework, the Company adopted various Operating Guidelines ("Guidelines"), with the objective establishing a strong, sustainable compliance risk management program that conforms to regulatory and industry standards, and provides reasonable assurance that the following outcomes are achieved:

- a) Identification of applicable regulatory requirements;
- b) Assessment of inherent compliance risks of applicable regulatory requirements;
- c) Development of key controls designed to comply with the applicable regulatory requirements and to manage and mitigate compliance risks;
- d) Assessment of the design and operating effectiveness of controls to determine residual risk;
- e) Testing and monitoring of the ongoing operation of the controls and identification of gaps and other issues; and
- f) Reporting to management on the overall effectiveness of the regulatory compliance management program and the state of compliance of the business.

The Board provides the highest level of independent oversight of the management and operations of the Company. The Board is also responsible for approving regulatory compliance Guidelines, and ensuring that the same are reviewed and assessed on its effectiveness.

Management is the first line of defense and is responsible for day-to-day compliance with the Guidelines. It is accountable for identifying and assessing Compliance Risks, specifically incorporating consideration of Compliance Risks in business activities and decisions, and managing compliance risks in day-to-day activities.

The Company's Compliance team are the second line of defense. The Chief Compliance Officer has oversight responsibility for the Guidelines and the Code of Business Conduct. The Chief Compliance Officer promotes a tone from the top and an atmosphere that fosters high ethical standards and conduct, and an appropriate risk culture.

Sensitivity of PNR and ARL

The key assumptions to which the estimation of the PNR and ARL are as follows:

Interest rates

Estimates are made as to future investment income arising from the assets that back up pre-need contracts. These estimates are based on current market returns, expectations about future economic and financial development and the Company's investment strategies.

If investment returns are projected to increase, the valuation interest rates, specifically the attainable rates used in PNR computation, and the best estimate interest rate used for the ARL computation can also be increased. Increasing the valuation interest rates will result in a lower PNR and ARL.

If investment returns are projected to decrease, lower valuation interest rates should be set-up. Decreasing the valuation interest rates will result in an increase in the PNR and ARL.

Lapsed and surrender rates

Lapses relate to the termination of pre-need plans due to non-payment of installments. Surrenders relate to voluntary termination of plans by the planholders. Plan termination assumptions are determined using statistical measures based on the Company's experience and vary by product type, plan duration and sales trends.

An increase in lapse and surrender rates generally results in lower PNR and ARL, while a decrease in lapse and surrender rates generally results in higher PNR and ARL.

A liability sensitivity analysis was performed on the two most significant valuation assumptions, which is lapse and surrender rates and interest rates. The PNR in this analysis is the liability before applying the staggered recognition of the TPNR liability in accordance with IC CL No. 23-2012. A 20% decrease in lapse and surrender rates, and 100 basis points drop in the interest rate would require an additional provision of P352 million and P307 million for PNR and ARL, respectively, in 2020 and P384 million and P323 million for PNR and ARL, respectively, in 2019.

31. CAPITAL RISK MANAGEMENT

This policy is intended to safeguard capital for the benefit of all the stakeholders including the shareholders, debt holders and the planholders. The interest of the shareholders is to maximize returns after fixed obligations due to the debt holders. The interests of participating and other planholders are also protected under the demutualization agreements and the appropriate regulatory requirements.

The BOD establishes the written policies, standards and procedures necessary to effectively implement policies.

The level of capital adequacy risk accepted by the Company should be prudent as determined by management. Capital adequacy risk is mitigated through appropriate Risk Management policies and processes.

A pre-need company incorporated after the effectivity of pre-need code shall have a minimum paid-up capital of P100,000,000. The Company has complied with the abovementioned minimum requirement set by the SEC and IC.

Capital structure

The equity account of the Company consists of equity attributable to equity holders of the parent comprising of share capital, additional paid-in capital, contributed surplus, investment revaluation reserves, deficit and accumulated trust fund income.

Maximizing returns on capital requires maintenance of an optimal capital structure. The Company seeks to maintain the optimal mixture of available financial instruments within its capital structure.

The overall quality of the capital base is a function of the characteristics and amounts of the individual types of capital within the overall capital structure. In general, the quality of individual capital items is measured by the capital's permanency, degree of subordination, ability to absorb losses and fixed charge obligations.

The Company is committed to maintaining a sufficiently high quality capital structure to:

- a. Maintain the target level of financial strength;
- b. Achieve the target financial ratings; and
- c. Achieve the target capital adequacy requirements.

The Company's net equity of P714 million and P544 million as at December 31, 2020 and 2019, respectively, and the Company's share capital of P125 million as at December 31, 2020 and 2019 are higher than the minimum capital requirement of P75 million. As disclosed in Note 18 the Company obtained SEC approval on December 3, 2010 to reduce the Company's share capital from P700 million to P125 million.

Internal capital monitoring is being performed regularly by the Company. The Company's senior management reviews and monitors its capital, as well as its adherence to local regulatory capital requirements during its quarterly Asia Capital Meeting and presented

to the Company's BOD semi-annually. The Company maintains at least the minimum capital required by the applicable local regulators.

The equity ratio in 2020 and 2019 are as follows:

	2020	2019
Equity	P 714,200,717	P 544,118,522
Total assets	6,269,869,618	6,315,348,069
Equity ratio	0.11:1	0.08:1

Management believes that the above ratios are within the acceptable range.

32. SUPPLEMENTARY INFORMATION REQUIRED BY THE BUREAU OF INTERNAL REVENUE (BIR) UNDER REVENUE REGULATIONS NO. 15-2010 AND 34-2020

The following supplementary information is presented for purposes of filing with the BIR and is not a required part of the basic financial statements.

Revenue Regulations No. 15-2010

Output VAT

Details of the Company's output VAT declared in 2020 is as follows:

	Vatable	Zero-rated	Total
Revenue	P22,471,425	P -	P 22,471,425
Output VAT	2,696,571	-	2,696,571

Input VAT

Details of the Company's input VAT claimed in 2020 are as follows:

Balance, January 1	P -
Add: Current year's domestic purchases/payments for Services lodged under cost of services	2,902,392
	2,902,392
Less: Claims for Input VAT	(2,902,392)
Balance, December 31	P -

Other taxes and licenses

Details of the Company's other taxes and licenses and permit fees paid or accrued in 2020 are as follows:

Charged to General and Administrative Expenses	
Local business taxes	P 1,019,491
Supervision fee	101,000
Permits and licenses	50,500
Registration and filing fees	49,750
Residence or community tax	10,500
	P 1,231,241

Withholding taxes

Details of the Company's withholding taxes paid or accrued during 2020 are as follows:

Expanded withholding taxes	P 708,446
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Documentary stamp tax

Details of the Company's payment of documentary stamp taxes per plan type in 2020 are as follows:

Pension non-par	P 177,924
Pension par	5,395
Educational par	1,384
Educational non-par	915
	P 185,618

Revenue Regulations No. 34-2020

BIR issued Revenue Regulations (RR) No. 34-2020, Prescribing the Guidelines and Procedures for the Submission of BIR Form No. 1709, Transfer Pricing Documentation (TPD) and other Supporting Documents, Amending for this Purpose the Pertinent Provisions of RR Nos. 19-2020 and 21-2002, as amended by RR No. 15-2010, to streamline the guidelines and procedures for the submission of BIR Form No. 1709, TPD and other supporting documents by providing safe harbors and materiality thresholds. Section 2 of the RR lists the taxpayers that are required to file and submit the RPT Form, together with the Annual Income Tax Return

The Company is not covered by the requirements and procedures for related party transactions provided under RR 34-2020 as it is not covered under Section 2 of the RR

33. APPROVAL OF FINANCIAL STATEMENTS

The financial statements of the Company have been approved and authorized for issuance by the Board of Directors on March 2, 2021.

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