



11 April 2025

ATTY. SUZY CLAIRE R. SELLEZA
Head - Issuer Compliance and Disclosure Department
Philippine Dealing & Exchange Corp.
29th Floor, BDO Equitable Tower
8751 Paseo de Roxas, Makati City 1226

Re : List of Top 100 Stockholders as of period ended March 2025

Relative to the above subject, we are transmitting herewith the following for Bank of Commerce – List of Top 100 Stockholders (Common and Preferred Shares)

Please acknowledge receipt hereof.

EVP Antonio S. Laquindanum
Chief Financial Officer

The Exchange does not warrant and holds no responsibility for the veracity of the facts and representations contained in all corporate disclosures, including financial reports. All data contained herein are prepared and submitted by the disclosing party to the Exchange, and are disseminated solely for purposes of information. Any questions on the data contained herein should be addressed directly to the Corporate Information Officer of the disclosing party.

Bank of Commerce BNCOM

PSE Disclosure Form 17-12-A - List of Top 100 Stockholders (Common Shares) *Reference: Section 17.12 of the Revised Disclosure Rules*

Type of Securities

Common

For the period ended Mar 31, 2025

Description of the Disclosure

In compliance with Article VII Section 17.12 of the Revised Disclosure Rules of the Exchange, we submit herewith the list of Top 100 Stockholders of Bank of Commerce as of 31 March 2025.

Please see the attached for additional information required to be disclosed, as provided by our stock transfer agent.

Number of Issued Common Shares	1,403,013,920
Number of Treasury Common Shares, if any	0
Number of Outstanding Common Shares	1,403,013,920
Number of Listed Common Shares	1,403,013,920
Number of Lodged Common Shares	301,725,670
PCD Nominee - Filipino	160,058,704
PCD Nominee - Non-Filipino	141,666,966
Number of Certificated Common Shares	1,101,288,250

Change from previous submission

There is no difference in the number of certificated shares between March 31, 2025, and December 31, 2024.

Bank of Commerce
STOCK TRANSFER MODULE
List of Stockholders
As of Mar 31, 2025

RANK	STOCKHOLDER NAME	Common	Preferred S1	TOTAL SHARES	% OF O/S
1	SMC EQUIVEST CORPORATION	68,305,560	416,666,670	484,972,230	26.651503 %
2	SAN MIGUEL PROPERTIES, INC.	447,711,800	0	447,711,800	24.603867 %
3	SAN MIGUEL CORP. RETIREMENT PLAN	432,626,860	0	432,626,860	23.774879 %
4	PCD NOMINEE CORPORATION (FILIPINO)	160,058,704	0	160,058,704	8.795978 %
5	PCD NOMINEE CORPORATION (NON-FILIPINO)	141,666,966	0	141,666,966	7.785266 %
6	CARITAS HEALTH SHIELD INC.	109,666,640	0	109,666,640	6.026697 %
7	ALEXCORP PROFITS LIMITED	14,749,100	0	14,749,100	0.810532 %
8	Q-TECH ALLIANCE HOLDINGS, INC.	12,171,660	0	12,171,660	0.668890 %
9	PVB-TMG AS TRUSTEE OF COLLEGE ASSURANCE PLAN PHILS. INC., RETIREMENT FUND	3,673,860	0	3,673,860	0.201896 %
10	CABIEN CORPORATION	3,600,650	0	3,600,650	0.197873 %
11	JGF HOLDINGS, INC.	2,163,850	0	2,163,850	0.118914 %
12	RDA HOLDINGS	2,163,850	0	2,163,850	0.118914 %
13	BIC MANAGEMENT AND CONSULTANCY, INC.	1,476,350	0	1,476,350	0.081132 %
14	BANK OF COMMERCE - TRUST SERVICES GROUP AS TRUSTEE FOR BANK OF COMMERCE RETIREMENT PLAN	730,670	0	730,670	0.040154 %
15	ESTER REYES QUERIDO	674,800	0	674,800	0.037083 %
16	ANTONIO TAN TAN	414,900	0	414,900	0.022801 %
17	ROCKSHED MANAGEMENT, INC.	187,600	0	187,600	0.010310 %
18	COMMERCE & TRADE INSURANCE BROKERAGE, INC.	147,190	0	147,190	0.008089 %
19	RAFAEL E. EVANGELISTA	133,360	0	133,360	0.007329 %
20	J. MARSH THOMSON	132,030	0	132,030	0.007256 %
21	RUDY A. VERANO	120,000	0	120,000	0.006595 %
22	MARIE LENORE B. SAUNDERS	83,200	0	83,200	0.004572 %
23	GISELA M. MELCHOR	80,000	0	80,000	0.004396 %
24	ERNESTO M. ESPALDON	62,660	0	62,660	0.003443 %
25	ROMULO M. ESPALDON	62,650	0	62,650	0.003443 %
26	TRANQUIL GERVAICIO III SUAVERDEZ SALVADOR	42,000	0	42,000	0.002308 %
27	ENRIQUE A. SOBREPENA, JR.	12,020	0	12,020	0.000661 %
28	ROANNA VICTORIA UY	10,000	0	10,000	0.000550 %
29	MARISSA B. ESPINO	9,790	0	9,790	0.000538 %
30	RIZALDY TOLENTINO	5,850	0	5,850	0.000321 %
31	AUGUSTO C. AGUSTIN	5,710	0	5,710	0.000314 %
32	RICHARD OLIVER RIVERA MALONG	5,000	0	5,000	0.000275 %
33	MYRA P. VILLANUEVA	5,000	0	5,000	0.000275 %
34	JOSE F.S. BENGZON	2,880	0	2,880	0.000158 %
35	MIRIAM VELOIRA	2,870	0	2,870	0.000158 %
36	SUSAN R. ALCALA-URANZA	2,850	0	2,850	0.000157 %
37	GLORIA D. B. LOPEZ	2,670	0	2,670	0.000147 %
38	MANUEL L. MANALASTAS	2,270	0	2,270	0.000125 %
39	ROBERTO BAYOT	2,130	0	2,130	0.000117 %
40	MILAGROS P. VILLANUEVA	2,000	0	2,000	0.000110 %
41	MYRNA P. VILLANUEVA	2,000	0	2,000	0.000110 %
42	SAMUEL V. POLETE	1,740	0	1,740	0.000096 %
43	MARLENE O. DE LA CRUZ	1,600	0	1,600	0.000088 %
44	ROLANDO B. MANGOBA	1,600	0	1,600	0.000088 %
45	JOSE F. ACETRE	1,060	0	1,060	0.000058 %
46	JOSEFINA E. CRUZ	1,060	0	1,060	0.000058 %
47	LUZVIMINDA GALANG	1,060	0	1,060	0.000058 %
48	ELINOR N. JAVIER	1,060	0	1,060	0.000058 %
49	MA. CHRISTINA NAKANISHI	1,060	0	1,060	0.000058 %
50	DINNA PEREZ	1,060	0	1,060	0.000058 %
51	EDMUNDO B. SANTOS	1,060	0	1,060	0.000058 %
52	WILLIAM P. SOTTO	1,060	0	1,060	0.000058 %
53	JAYBEE C. BARAQUEL	1,000	0	1,000	0.000055 %
54	JUAN CARLOS V. CABREZA	1,000	0	1,000	0.000055 %
55	MARIETTA V. CABREZA	1,000	0	1,000	0.000055 %
56	GABRIELLE CLAUDIA FERRANCO HERRERA	1,000	0	1,000	0.000055 %
57	JOSELITO CORPUS HERRERA	1,000	0	1,000	0.000055 %
58	NADEZHDA ISKRA FERRANCO HERRERA	1,000	0	1,000	0.000055 %
59	JESUS SAN LUIS VALENCIA	800	0	800	0.000044 %
60	EDITA M. AGUILAR	530	0	530	0.000029 %
61	GREGORIA CORAZON ALCALA	530	0	530	0.000029 %
62	CARLOS BANTAY	530	0	530	0.000029 %
63	LESLEY CAROL CUAYCONG	530	0	530	0.000029 %
64	FREDDIE M. DOMINGO	530	0	530	0.000029 %
65	WILFREDO T. ESGUERRA	530	0	530	0.000029 %
66	MARCIANO M. FACUN	530	0	530	0.000029 %
67	RAUL B. MARIFOSQUE	530	0	530	0.000029 %
68	ROLANDO S. SANTOS	530	0	530	0.000029 %
69	JENNIFER T. RAMOS	500	0	500	0.000027 %
70	MARIO J. ENRIQUEZ	420	0	420	0.000023 %
71	FRANCISCO A. ASTILLA IV	390	0	390	0.000021 %
72	CESAR G. DE LA CRUZ	390	0	390	0.000021 %
73	EDMUNDO COSME G. DUAY	390	0	390	0.000021 %
74	JOSELITO L. AGUSTIN	260	0	260	0.000014 %
75	EDGAR R. ANABO	260	0	260	0.000014 %
76	ROWENA B. BERNARDINO	260	0	260	0.000014 %
77	MARY ANN D. CONCEPCION	260	0	260	0.000014 %
78	ROGELIO D. DE LEON	260	0	260	0.000014 %
79	MA. CRISTINA A. DE VERA	260	0	260	0.000014 %
80	MANUEL C. EDRALIN	260	0	260	0.000014 %

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Bank of Commerce
STOCK TRANSFER MODULE
List of Stockholders
As of Mar 31, 2025

PAGE 2

RANK	STOCKHOLDER NAME	Common	Preferred S1	TOTAL SHARES	% OF O/S
81	JOSEPHINE DELILAH B. MENDIOLA	260	0	260	0.000014 %
82	DANTE PALOMARES	260	0	260	0.000014 %
83	ROBERTO C. PAZ	260	0	260	0.000014 %
84	ALFREDO B. PRAGIDES	260	0	260	0.000014 %
85	RITA MILANIE B. RICASIO	260	0	260	0.000014 %
86	ERNESTO A. SAN DIEGO	260	0	260	0.000014 %
87	FLORENCIA D. C. PENAFLORES	210	0	210	0.000012 %
88	CERES V. PALISOC	160	0	160	0.000009 %
89	SALVADOR URSUA	160	0	160	0.000009 %
90	CYNTHIA J. GRUET	120	0	120	0.000007 %
91	EDWIN T. AMAHAN	100	0	100	0.000005 %
92	RENE V. BERNARDINO	100	0	100	0.000005 %
93	WINSTON A. CHAN	100	0	100	0.000005 %
94	DANILO A. DE LA CRUZ	100	0	100	0.000005 %
95	MARIZZA Z. DIZON	100	0	100	0.000005 %
96	GLORIA W. JAVIER	100	0	100	0.000005 %
97	ROSALINDA M. KATIGBAK	100	0	100	0.000005 %
98	MODESTO F. MAPA	100	0	100	0.000005 %
99	ELIGIO MARQUEZ	100	0	100	0.000005 %
100	LEONARDO J. MATIGNAS, JR.	100	0	100	0.000005 %
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		1,403,012,060	416,666,670	1,819,678,730	99.999898 %
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TOTAL NO. OF SHARES : 1,819,680,590
TOTAL NO. OF DISTINCT STOCKHOLDERS : 158
TOTAL NO. OF ACCOUNTS : 158

OUTSTANDING BALANCES FOR SPECIFIC COMPANY

March 31, 2025

BNCOM0000000

BPNAME	QUANTITY
R. S. LIM & CO., INC.	92,860,900
PHILIPPINE EQUITY PARTNERS, INC.	46,609,700
GOVERNMENT SERVICE INSURANCE SYSTEM	25,000,000
BA SECURITIES, INC.	23,628,400
BDO SECURITIES CORPORATION	23,245,109
BANK OF COMMERCE - TRUST SERVICES GROUP	20,357,500
CITIBANK N.A.	10,217,700
EASTWEST BANKING CORPORATION - TRUST DIVISION	8,607,850
PNB SECURITIES, INC.	4,845,350
LITONJUA SECURITIES, INC.	3,604,720
SECURITIES SPECIALISTS, INC.	3,181,500
COL Financial Group, Inc.	3,056,714
SunSecurities, Inc.	2,255,100
THE FIRST RESOURCES MANAGEMENT & SECURITIES CORP.	2,152,200
GUILD SECURITIES, INC.	1,972,061
FIRST METRO SECURITIES BROKERAGE CORP.	1,821,868
BPI SECURITIES CORPORATION	1,791,382
ABACUS SECURITIES CORPORATION	1,760,310
ASIASEC EQUITIES, INC.	1,470,200
SAN MIGUEL BREWERY INC. RETIREMENT PLAN	1,400,000
CHINA BANK SECURITIES CORPORATION	1,391,900
AAA SOUTHEAST EQUITIES, INCORPORATED	1,303,400
LANDBANK SECURITIES, INC.	1,285,900
EVERGREEN STOCK BROKERAGE & SEC., INC.	1,189,000
THE HONGKONG AND SHANGHAI BANKING CORP. LTD. -CLIENTS' ACCT.	1,149,500
E. CHUA CHIACO SECURITIES, INC.	873,000
SAN MIGUEL YAMAMURA PACKAGING CORP. RETIREMENT PLAN	793,600
R. NUBLA SECURITIES, INC.	790,600
MERCANTILE SECURITIES CORP.	610,000
UNICAPITAL SECURITIES INC.	608,800
REGINA CAPITAL DEVELOPMENT CORPORATION	529,000
TRITON SECURITIES CORP.	528,900
AB CAPITAL SECURITIES, INC.	525,903
PHILSTOCKS FINANCIAL INC	459,271
PAPA SECURITIES CORPORATION	454,400
LARRGO SECURITIES CO., INC.	448,900
TOWER SECURITIES, INC.	428,300
RTG & COMPANY, INC.	321,000

DAVID GO SECURITIES CORP.	313,500
ALAKOR SECURITIES CORPORATION	290,000
SOLAR SECURITIES, INC.	273,000
EASTERN SECURITIES DEVELOPMENT CORPORATION	270,500
R. COYIUTO SECURITIES, INC.	268,600
MANDARIN SECURITIES CORPORATION	250,000
OPTIMUM SECURITIES CORPORATION	236,700
BELSON SECURITIES, INC.	230,000
LOPEZ, LOCSIN, LEDESMA & CO., INC.	225,000
UPCC SECURITIES CORP.	212,500
F. YAP SECURITIES, INC.	211,200
JSG SECURITIES, INC.	210,500
PREMIUM SECURITIES, INC.	210,000
RCBC SECURITIES, INC.	208,200
AP SECURITIES INCORPORATED	204,800
STANDARD SECURITIES CORPORATION	204,200
SINCERE SECURITIES CORPORATION	200,000
MERIDIAN SECURITIES, INC.	196,900
H. E. BENNETT SECURITIES, INC.	195,400
G.D. TAN & COMPANY, INC.	178,000
TANSENGCO & CO., INC.	177,700
STRATEGIC EQUITIES CORP.	171,800
WEALTH SECURITIES, INC.	168,400
HDI SECURITIES, INC.	167,900
GOLDEN TOWER SECURITIES & HOLDINGS, INC.	162,400
CAMPOS, LANUZA & COMPANY, INC.	157,100
QUALITY INVESTMENTS & SECURITIES CORPORATION	154,000
SB EQUITIES, INC.	150,000
ALPHA SECURITIES CORP.	137,000
NEW WORLD SECURITIES CO., INC.	131,400
MAYBANK SECURITIES, INC.	130,800
SUMMIT SECURITIES, INC.	120,000
GLOBALINKS SECURITIES & STOCKS, INC.	109,000
VENTURE SECURITIES, INC.	106,700
FIDELITY SECURITIES, INC.	102,000
GINEBRA SAN MIGUEL, INC. RETIREMENT PLAN	100,600
YAO & ZIALCITA, INC.	95,000
A. T. DE CASTRO SECURITIES CORP.	94,000
SUPREME STOCKBROKERS, INC	85,000
LUCKY SECURITIES, INC.	77,000
DIVERSIFIED SECURITIES, INC.	70,200
APEX PHILIPPINES EQUITIES CORPORATION	65,000
GOLDSTAR SECURITIES, INC.	58,000
DA MARKET SECURITIES, INC.	55,000

PLATINUM SECURITIES, INC.	55,000
ANSALDO, GODINEZ & CO., INC.	54,500
EQUITIWORLD SECURITIES, INC.	52,900
A & A SECURITIES, INC.	51,100
STANDARD CHARTERED BANK	50,000
IMPERIAL, DE GUZMAN, ABALOS & CO., INC.	48,400
MDR SECURITIES, INC.	47,100
PAN ASIA SECURITIES CORP.	40,000
SALISBURY SECURITIES CORPORATION	34,000
EAST WEST CAPITAL CORPORATION	32,000
AURORA SECURITIES, INC.	30,700
INTRA-INVEST SECURITIES, INC.	30,500
DRAGONFI SECURITIES, INC.	26,832
EAGLE EQUITIES, INC.	26,700
CTS GLOBAL EQUITY GROUP, INC.	26,000
VC SECURITIES CORPORATION	26,000
INVESTORS SECURITIES, INC.	23,600
CUALOPING SECURITIES CORPORATION	20,000
BERNAD SECURITIES, INC.	17,000
ASIA PACIFIC CAPITAL EQUITIES & SECURITIES CORP.	14,000
YU & COMPANY, INC.	14,000
ASTRA SECURITIES CORPORATION	10,000
COHERCO SECURITIES, INC.	10,000
MOUNT PEAK SECURITIES, INC.	6,700
VALUE QUEST SECURITIES CORPORATION	5,500
TIMSON SECURITIES, INC.	4,600
SARANGANI SECURITIES, INC.	2,000
FIRST ORIENT SECURITIES, INC.	1,000
I. B. GIMENEZ SECURITIES, INC.	500
LUNA SECURITIES, INC.	100
TOTAL LODGED SHARES	301,725,670



Bank of Commerce

1. Report: List of Top 100 Stockholders (BNCOM)

For the period ended	March 31, 2025 Calendar
Number of Issued Common Shares	1,403,013,920
Number of Treasury Common Shares	0
Number of Outstanding Common Shares	1,403,013,920
Number of Listed Common Shares	1,403,013,920
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