



12 April, 2024

**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 2024**

Relative to the above subject, we are transmitting herewith the following for Bank of Commerce – List of Top 100 Stockholders (Common and Preferred Shares) as of period ended March 2024

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, 2024

#### 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 2024.

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	293,239,020
PCD Nominee - Filipino	152,941,354
PCD Nominee - Non-Filipino	140,297,666
Number of Certificated Common Shares	1,109,774,900

Change from previous submission

There is a difference of 85,000 common shares between the Number of Certificated Shares as of March 31, 2024 (1,109,774,900 common shares) and the Number of Certificated Shares as of Number of Certificated Shares as of December 31, 2023 (1,109,689,900 common shares). The difference represents the net change in the upliftment requests from the PDTC and the lodgement requests from the PDTC participants for the relevant quarter.

**Filed on behalf by:**

<b>Name</b>	Evita Caballa
<b>Designation</b>	Corporate Secretary

Bank of Commerce  
 STOCK TRANSFER MODULE  
 List of Stockholders  
 As of Mar 31, 2024

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)	152,941,354	0	152,941,354	8.404846 %
5	PCD NOMINEE CORPORATION (NON-FILIPINO)	140,297,666	0	140,297,666	7.710016 %
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 FOR COMPREHENSIVE ANNUITY PLAN PENSION TRUST FUND	4,980,980	0	4,980,980	0.273728 %
10	PVB-TMG AS TRUSTEE OF COLLEGE ASSURANCE PLAN PHILS. INC., RETIREMENT FUND	3,673,860	0	3,673,860	0.201896 %
11	COMPREHENSIVE ANNUITY PLAN PENSION TRUST FUND	3,626,870	0	3,626,870	0.199314 %
12	CABIEN CORPORATION	3,600,650	0	3,600,650	0.197873 %
13	RDA HOLDINGS	2,163,850	0	2,163,850	0.118914 %
14	JGF HOLDINGS, INC.	2,163,850	0	2,163,850	0.118914 %
15	BIC MANAGEMENT AND CONSULTANCY, INC.	1,476,350	0	1,476,350	0.081132 %
16	BANK OF COMMERCE - TRUST SERVICES GROUP AS TRUSTEE FOR BANK OF COMMERCE RETIREMENT PLAN	730,670	0	730,670	0.040154 %
17	ESTER REYES QUERIDO	674,800	0	674,800	0.037083 %
18	ANTONIO TAN TAN	414,900	0	414,900	0.022801 %
19	ROCKSHED MANAGEMENT, INC.	187,600	0	187,600	0.010310 %
20	COMMERCE & TRADE INSURANCE BROKERAGE, INC.	147,190	0	147,190	0.008089 %
21	RAFAEL E. EVANGELISTA	133,360	0	133,360	0.007329 %
22	J. MARSH THOMSON	132,030	0	132,030	0.007256 %
23	MARIE LENORE B. SAUNDERS	83,200	0	83,200	0.004572 %
24	GISELA M. MELCHOR	80,000	0	80,000	0.004396 %
25	ERNESTO M. ESPALDON	62,660	0	62,660	0.003443 %
26	ROMULO M. ESPALDON	62,650	0	62,650	0.003443 %
27	TRANQUIL GERVACIO III SUAVERDEZ SALVADOR	42,000	0	42,000	0.002308 %
28	ENRIQUE A. SOBREPENA, JR.	12,020	0	12,020	0.000661 %
29	ROANNA VICTORIA UY	10,000	0	10,000	0.000550 %
30	MARISSA B. ESPINO	9,790	0	9,790	0.000538 %
31	RIZALDY TOLENTINO	5,850	0	5,850	0.000321 %
32	AUGUSTO C. AGUSTIN	5,710	0	5,710	0.000314 %
33	MYRA P. VILLANUEVA	5,000	0	5,000	0.000275 %
34	RICHARD OLIVER RIVERA MALONG	5,000	0	5,000	0.000275 %
35	JOSE F.S. BENGZON	2,880	0	2,880	0.000158 %
36	MIRIAM VELOIRA	2,870	0	2,870	0.000158 %
37	SUSAN R. ALCALA-URANZA	2,850	0	2,850	0.000157 %
38	GLORIA D. B. LOPEZ	2,670	0	2,670	0.000147 %
39	MANUEL L. MANALASTAS	2,270	0	2,270	0.000125 %
40	ROBERTO BAYOT	2,130	0	2,130	0.000117 %
41	MILAGROS P. VILLANUEVA	2,000	0	2,000	0.000110 %
42	MYRNA P. VILLANUEVA	2,000	0	2,000	0.000110 %
43	SAMUEL V. POBLETE	1,740	0	1,740	0.000096 %
44	MARLENE O. DE LA CRUZ	1,600	0	1,600	0.000088 %
45	ROLANDO B. MANGOBA	1,600	0	1,600	0.000088 %
46	LUZVIMINDA GALANG	1,060	0	1,060	0.000058 %
47	JOSE F. ACETRE	1,060	0	1,060	0.000058 %
48	DINNA PEREZ	1,060	0	1,060	0.000058 %
49	MA. CHRISTINA NAKANISHI	1,060	0	1,060	0.000058 %

Bank of Commerce  
STOCK TRANSFER MODULE  
List of Stockholders  
As of Mar 31, 2024

RANK	STOCKHOLDER NAME	Common	Preferred S1	TOTAL SHARES	% OF O/S
50	WILLIAM P. SOTTO	1,060	0	1,060	0.000058 %
51	JOSEFINA E. CRUZ	1,060	0	1,060	0.000058 %
52	ELINOR N. JAVIER	1,060	0	1,060	0.000058 %
53	EDMUNDO B. SANTOS	1,060	0	1,060	0.000058 %
54	MARIETTA V. CABREZA	1,000	0	1,000	0.000055 %
55	JOSELITO CORPUS HERRERA	1,000	0	1,000	0.000055 %
56	GABRIELLE CLAUDIA FERRANCO HERRERA	1,000	0	1,000	0.000055 %
57	NADEZHDA ISKRA FERRANCO HERRERA	1,000	0	1,000	0.000055 %
58	JUAN CARLOS V. CABREZA	1,000	0	1,000	0.000055 %
59	JESUS SAN LUIS VALENCIA	800	0	800	0.000044 %
60	RAUL B. MARIFOSQUE	530	0	530	0.000029 %
61	EDITA M. AGUILAR	530	0	530	0.000029 %
62	CARLOS BANTAY	530	0	530	0.000029 %
63	FREDDIE M. DOMINGO	530	0	530	0.000029 %
64	MARCIANO M. FACUN	530	0	530	0.000029 %
65	WILFREDO T. ESGUERRA	530	0	530	0.000029 %
66	LESLEY CAROL CUAYCONG	530	0	530	0.000029 %
67	ROLANDO S. SANTOS	530	0	530	0.000029 %
68	GREGORIA CORAZON ALCALA	530	0	530	0.000029 %
69	MARIO J. ENRIQUEZ	420	0	420	0.000023 %
70	FRANCISCO A. ASTILLA IV	390	0	390	0.000021 %
71	EDMUNDO COSME G. DUAY	390	0	390	0.000021 %
72	CESAR G. DE LA CRUZ	390	0	390	0.000021 %
73	JENNIFER T. RAMOS	300	0	300	0.000016 %
74	MANUEL C. EDRALIN	260	0	260	0.000014 %
75	MARY ANN D. CONCEPCION	260	0	260	0.000014 %
76	ROGELIO D. DE LEON	260	0	260	0.000014 %
77	JOSEPHINE DELILAH B. MENDIOLA	260	0	260	0.000014 %
78	ERNESTO A. SAN DIEGO	260	0	260	0.000014 %
79	DANTE PALOMARES	260	0	260	0.000014 %
80	MA. CRISTINA A. DE VERA	260	0	260	0.000014 %
81	RITA MILANIE B. RICASIO	260	0	260	0.000014 %
82	ROWENA B. BERNARDINO	260	0	260	0.000014 %
83	ALFREDO B. PRAGIDES	260	0	260	0.000014 %
84	EDGAR R. ANABO	260	0	260	0.000014 %
85	JOSELITO L. AGUSTIN	260	0	260	0.000014 %
86	ROBERTO C. PAZ	260	0	260	0.000014 %
87	FLORENCIA D. C. PENAFLO	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	DANIEL GABRIEL M. MONTECILLO	100	0	100	0.000005 %
92	NOEL I. SARMIENTO	100	0	100	0.000005 %
93	SIMON R. PATERNO	100	0	100	0.000005 %
94	ELIGIO MARQUEZ	100	0	100	0.000005 %
95	DULCE H. ZULUETA	100	0	100	0.000005 %
96	MARIZZA Z. DIZON	100	0	100	0.000005 %
97	RENE V. BERNARDINO	100	0	100	0.000005 %
98	CHRISTINE S. SANTOS	100	0	100	0.000005 %
99	EDWIN T. AMAHAN	100	0	100	0.000005 %
100	LEONARDO J. MATIGNAS, JR.	100	0	100	0.000005 %

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Bank of Commerce  
STOCK TRANSFER MODULE  
List of Stockholders  
As of Mar 31, 2024

RANK	STOCKHOLDER NAME	Common	Preferred S1	TOTAL SHARES	% OF O/S
		1,403,012,060	416,666,670	1,819,678,730	99.999898 %

TOTAL NO. OF SHARES : 1,819,680,590  
TOTAL NO. OF DISTINCT STOCKHOLDERS : 158  
TOTAL NO. OF ACCOUNTS : 158

BNCOM0000000 March 27, 2024

**OUTSTANDING BALANCES FOR SPECIFIC COMPANY**

**March 27, 2024**

**BNCOM0000000**

<b>BPNAME</b>	<b>QUANTITY</b>
R. S. LIM & CO., INC.	92,860,900
PHILIPPINE EQUITY PARTNERS, INC.	46,603,800
GOVERNMENT SERVICE INSURANCE SYSTEM	25,000,000
BA SECURITIES, INC.	23,844,800
BDO SECURITIES CORPORATION	22,900,940
BANK OF COMMERCE - TRUST SERVICES GROUP	20,465,900
CITIBANK N.A.	10,217,700
PNB SECURITIES, INC.	4,907,450
SECURITIES SPECIALISTS, INC.	3,668,100
LITONJUA SECURITIES, INC.	3,604,720
COL Financial Group, Inc.	3,039,601
SunSecurities, Inc.	2,245,100
THE FIRST RESOURCES MANAGEMENT & SECURITIES CORP.	2,207,400
GUILD SECURITIES, INC.	1,972,150
FIRST METRO SECURITIES BROKERAGE CORP.	1,779,100
BPI SECURITIES CORPORATION	1,747,746
ABACUS SECURITIES CORPORATION	1,510,310
CHINA BANK SECURITIES CORPORATION	1,478,800
ASIASEC EQUITIES, INC.	1,460,200
SAN MIGUEL BREWERY INC. RETIREMENT PLAN	1,400,000
LANDBANK SECURITIES, INC.	1,398,300
AAA SOUTHEAST EQUITIES, INCORPORATED	1,343,600
MAYBANK SECURITIES, INC.	1,147,400
EVERGREEN STOCK BROKERAGE & SEC., INC.	971,500
R. NUBLA SECURITIES, INC.	843,500
SAN MIGUEL YAMAMURA PACKAGING CORP. RETIREMENT PLAN	793,600
UNICAPITAL SECURITIES INC.	753,200
MERCANTILE SECURITIES CORP.	648,000
PAPA SECURITIES CORPORATION	579,600
TRITON SECURITIES CORP.	528,900
AB CAPITAL SECURITIES, INC.	522,300
REGINA CAPITAL DEVELOPMENT CORPORATION	492,900
PHILSTOCKS FINANCIAL INC	492,303
LARRGO SECURITIES CO., INC.	448,900
TOWER SECURITIES, INC.	418,300
LOPEZ, LOCSIN, LEDESMA & CO., INC.	325,000
RTG & COMPANY, INC.	318,000
DAVID GO SECURITIES CORP.	313,500

ALAKOR SECURITIES CORPORATION	309,900
SOLAR SECURITIES, INC.	278,000
STANDARD SECURITIES CORPORATION	270,000
DA MARKET SECURITIES, INC.	265,000
R. COYIUTO SECURITIES, INC.	260,500
EASTERN SECURITIES DEVELOPMENT CORPORATION	259,800
MANDARIN SECURITIES CORPORATION	250,000
BELSON SECURITIES, INC.	249,100
OPTIMUM SECURITIES CORPORATION	236,700
E. CHUA CHIACO SECURITIES, INC.	226,500
CAMPOS, LANUZA & COMPANY, INC.	213,400
UPCC SECURITIES CORP.	212,200
JSG SECURITIES, INC.	210,500
PREMIUM SECURITIES, INC.	210,000
AP SECURITIES INCORPORATED	200,800
SINCERE SECURITIES CORPORATION	200,000
RCBC SECURITIES, INC.	196,700
H. E. BENNETT SECURITIES, INC.	193,200
GOLDEN TOWER SECURITIES & HOLDINGS, INC.	180,000
EQUITIWORLD SECURITIES, INC.	172,900
STRATEGIC EQUITIES CORP.	171,800
WEALTH SECURITIES, INC.	168,400
G.D. TAN & COMPANY, INC.	168,000
MERIDIAN SECURITIES, INC.	166,300
QUALITY INVESTMENTS & SECURITIES CORPORATION	154,000
SB EQUITIES, INC.	153,000
HDI SECURITIES, INC.	145,000
ALPHA SECURITIES CORP.	137,000
F. YAP SECURITIES, INC.	133,100
NEW WORLD SECURITIES CO., INC.	120,200
SUMMIT SECURITIES, INC.	120,000
TANSENGCO & CO., INC.	113,000
GLOBALINKS SECURITIES & STOCKS, INC.	109,000
FIDELITY SECURITIES, INC.	102,000
GINEBRA SAN MIGUEL, INC. RETIREMENT PLAN	100,600
VENTURE SECURITIES, INC.	95,400
A. T. DE CASTRO SECURITIES CORP.	94,000
DIVERSIFIED SECURITIES, INC.	90,200
SUPREME STOCKBROKERS, INC	85,000
LUCKY SECURITIES, INC.	77,000
APEX PHILIPPINES EQUITIES CORPORATION	67,000
GOLDSTAR SECURITIES, INC.	66,000
IMPERIAL, DE GUZMAN, ABALOS & CO., INC.	64,700
YAO & ZIALCITA, INC.	60,000

PLATINUM SECURITIES, INC.	55,000
ANSALDO, GODINEZ & CO., INC.	54,500
PAN ASIA SECURITIES CORP.	52,500
STANDARD CHARTERED BANK	50,000
A & A SECURITIES, INC.	44,200
EAGLE EQUITIES, INC.	40,000
SALISBURY SECURITIES CORPORATION	34,000
EAST WEST CAPITAL CORPORATION	32,000
AURORA SECURITIES, INC.	30,700
INTRA-INVEST SECURITIES, INC.	30,500
CTS GLOBAL EQUITY GROUP, INC.	26,000
VC SECURITIES CORPORATION	26,000
MDR SECURITIES, INC.	25,000
INVESTORS SECURITIES, INC,	23,500
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
DRAGONFI SECURITIES, INC.	400
<b>TOTAL</b>	<b>293,239,020</b>



## Bank of Commerce

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

For the period ended	March 31, 2024 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
Number of Lodged Common Shares	293,239,020
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