



14 October 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 September 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)

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 Sep 30, 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 30 September 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 | 293,117,820 |
| PCD Nominee - Filipino | 151,510,654 |
| PCD Nominee - Non-Filipino | 141,607,166 |
| Number of Certificated Common Shares | 1,109,896,100 |

Change from previous submission

There is a difference of 200 common shares between the Number of Certificated Shares as of September 30, 2024 (1,109,896,100 common shares) and the Number of Certificated Shares as of Number of Certificated Shares as of June 30, 2024 (1,109,895,900 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:

| | |
|--------------------|---------------------|
| Name | Evita Caballa |
| Designation | Corporate Secretary |

Bank of Commerce
 STOCK TRANSFER MODULE
 List of Stockholders
 As of Sep 30, 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) | 151,510,654 | 0 | 151,510,654 | 8.326222 % |
| 5 | PCD NOMINEE CORPORATION (NON-FILIPINO) | 141,607,166 | 0 | 141,607,166 | 7.781979 % |
| 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 | EASTWEST BANKING CORP. - TRUST AND ASSET MANAGEMENT GROUP AS TRUSTEE OF COMPREHENSIVE ANNUITY AND PENSION PLAN CORP. | 8,607,850 | 0 | 8,607,850 | 0.473042 % |
| 10 | PVB-TMG AS TRUSTEE OF COLLEGE ASSURANCE PLAN PHILS. INC., RETIREMENT FUND | 3,673,860 | 0 | 3,673,860 | 0.201896 % |
| 11 | CABIEN CORPORATION | 3,600,650 | 0 | 3,600,650 | 0.197873 % |
| 12 | JGF HOLDINGS, INC. | 2,163,850 | 0 | 2,163,850 | 0.118914 % |
| 13 | RDA HOLDINGS | 2,163,850 | 0 | 2,163,850 | 0.118914 % |
| 14 | BIC MANAGEMENT AND CONSULTANCY, INC. | 1,476,350 | 0 | 1,476,350 | 0.081132 % |
| 15 | BANK OF COMMERCE - TRUST SERVICES GROUP AS TRUSTEE FOR BANK OF COMMERCE RETIREMENT PLAN | 730,670 | 0 | 730,670 | 0.040154 % |
| 16 | ESTER REYES QUERIDO | 674,800 | 0 | 674,800 | 0.037083 % |
| 17 | ANTONIO TAN TAN | 414,900 | 0 | 414,900 | 0.022801 % |
| 18 | ROCKSHED MANAGEMENT, INC. | 187,600 | 0 | 187,600 | 0.010310 % |
| 19 | COMMERCE & TRADE INSURANCE BROKERAGE, INC. | 147,190 | 0 | 147,190 | 0.008089 % |
| 20 | RAFAEL E. EVANGELISTA | 133,360 | 0 | 133,360 | 0.007329 % |
| 21 | J. MARSH THOMSON | 132,030 | 0 | 132,030 | 0.007256 % |
| 22 | RUDY A. VERANO | 120,000 | 0 | 120,000 | 0.006595 % |
| 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 GERVAICIO 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 | RICHARD OLIVER RIVERA MALONG | 5,000 | 0 | 5,000 | 0.000275 % |
| 34 | MYRA P. VILLANUEVA | 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 | JOSE F. ACETRE | 1,060 | 0 | 1,060 | 0.000058 % |
| 47 | JOSEFINA E. CRUZ | 1,060 | 0 | 1,060 | 0.000058 % |
| 48 | LUZVIMINDA GALANG | 1,060 | 0 | 1,060 | 0.000058 % |

| RANK | STOCKHOLDER NAME | Common | Preferred S1 | TOTAL SHARES | % OF O/S |
|------|------------------------------------|--------|--------------|--------------|------------|
| 49 | ELINOR N. JAVIER | 1,060 | 0 | 1,060 | 0.000058 % |
| 50 | MA. CHRISTINA NAKANISHI | 1,060 | 0 | 1,060 | 0.000058 % |
| 51 | DINNA PEREZ | 1,060 | 0 | 1,060 | 0.000058 % |
| 52 | EDMUNDO B. SANTOS | 1,060 | 0 | 1,060 | 0.000058 % |
| 53 | WILLIAM P. SOTTO | 1,060 | 0 | 1,060 | 0.000058 % |
| 54 | JAYBEE C. BARAQUEL | 1,000 | 0 | 1,000 | 0.000055 % |
| 55 | JUAN CARLOS V. CABREZA | 1,000 | 0 | 1,000 | 0.000055 % |
| 56 | MARIETTA V. CABREZA | 1,000 | 0 | 1,000 | 0.000055 % |
| 57 | GABRIELLE CLAUDIA FERRANCO HERRERA | 1,000 | 0 | 1,000 | 0.000055 % |
| 58 | JOSELITO CORPUS HERRERA | 1,000 | 0 | 1,000 | 0.000055 % |
| 59 | NADEZHDA ISKRA FERRANCO HERRERA | 1,000 | 0 | 1,000 | 0.000055 % |
| 60 | JESUS SAN LUIS VALENCIA | 800 | 0 | 800 | 0.000044 % |
| 61 | EDITA M. AGUILAR | 530 | 0 | 530 | 0.000029 % |
| 62 | GREGORIA CORAZON ALCALA | 530 | 0 | 530 | 0.000029 % |
| 63 | CARLOS BANTAY | 530 | 0 | 530 | 0.000029 % |
| 64 | LESLEY CAROL CUAYCONG | 530 | 0 | 530 | 0.000029 % |
| 65 | FREDDIE M. DOMINGO | 530 | 0 | 530 | 0.000029 % |
| 66 | WILFREDO T. ESGUERRA | 530 | 0 | 530 | 0.000029 % |
| 67 | MARCIANO M. FACUN | 530 | 0 | 530 | 0.000029 % |
| 68 | RAUL B. MARIFOSQUE | 530 | 0 | 530 | 0.000029 % |
| 69 | ROLANDO S. SANTOS | 530 | 0 | 530 | 0.000029 % |
| 70 | JENNIFER T. RAMOS | 500 | 0 | 500 | 0.000027 % |
| 71 | MARIO J. ENRIQUEZ | 420 | 0 | 420 | 0.000023 % |
| 72 | FRANCISCO A. ASTILLA IV | 390 | 0 | 390 | 0.000021 % |
| 73 | CESAR G. DE LA CRUZ | 390 | 0 | 390 | 0.000021 % |
| 74 | EDMUNDO COSME G. DUAY | 390 | 0 | 390 | 0.000021 % |
| 75 | JOSELITO L. AGUSTIN | 260 | 0 | 260 | 0.000014 % |
| 76 | EDGAR R. ANABO | 260 | 0 | 260 | 0.000014 % |
| 77 | ROWENA B. BERNARDINO | 260 | 0 | 260 | 0.000014 % |
| 78 | MARY ANN D. CONCEPCION | 260 | 0 | 260 | 0.000014 % |
| 79 | ROGELIO D. DE LEON | 260 | 0 | 260 | 0.000014 % |
| 80 | MA. CRISTINA A. DE VERA | 260 | 0 | 260 | 0.000014 % |
| 81 | MANUEL C. EDRALIN | 260 | 0 | 260 | 0.000014 % |
| 82 | JOSEPHINE DELILAH B. MENDIOLA | 260 | 0 | 260 | 0.000014 % |
| 83 | DANTE PALOMARES | 260 | 0 | 260 | 0.000014 % |
| 84 | ROBERTO C. PAZ | 260 | 0 | 260 | 0.000014 % |
| 85 | ALFREDO B. PRAGIDES | 260 | 0 | 260 | 0.000014 % |
| 86 | RITA MILANIE B. RICASIO | 260 | 0 | 260 | 0.000014 % |
| 87 | ERNESTO A. SAN DIEGO | 260 | 0 | 260 | 0.000014 % |
| 88 | FLORENCIA D. C. PENAFLO | 210 | 0 | 210 | 0.000012 % |
| 89 | CERES V. PALISOC | 160 | 0 | 160 | 0.000009 % |
| 90 | SALVADOR URSUA | 160 | 0 | 160 | 0.000009 % |
| 91 | CYNTHIA J. GRUET | 120 | 0 | 120 | 0.000007 % |
| 92 | EDWIN T. AMAHAN | 100 | 0 | 100 | 0.000005 % |
| 93 | RENE V. BERNARDINO | 100 | 0 | 100 | 0.000005 % |
| 94 | WINSTON A. CHAN | 100 | 0 | 100 | 0.000005 % |
| 95 | DANILO A. DE LA CRUZ | 100 | 0 | 100 | 0.000005 % |
| 96 | MARIZZA Z. DIZON | 100 | 0 | 100 | 0.000005 % |
| 97 | GLORIA W. JAVIER | 100 | 0 | 100 | 0.000005 % |
| 98 | ROSALINDA M. KATIGBAK | 100 | 0 | 100 | 0.000005 % |
| 99 | MODESTO F. MAPA | 100 | 0 | 100 | 0.000005 % |
| 100 | ELIGIO MARQUEZ | 100 | 0 | 100 | 0.000005 % |

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Bank of Commerce
STOCK TRANSFER MODULE
List of Stockholders
As of Sep 30, 2024

| RANK | STOCKHOLDER NAME | Common | Preferred S1 | TOTAL SHARES | % OF O/S |
|------|------------------|---------------|--------------|---------------|-------------|
| | | 1,403,011,960 | 416,666,670 | 1,819,678,630 | 99.999892 % |

TOTAL NO. OF SHARES : 1,819,680,590
TOTAL NO. OF DISTINCT STOCKHOLDERS : 159
TOTAL NO. OF ACCOUNTS : 159

OUTSTANDING BALANCES FOR SPECIFIC COMPANY
September 30, 2024
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. | 23,762,400 |
| BDO SECURITIES CORPORATION | 22,973,140 |
| BANK OF COMMERCE - TRUST SERVICES GROUP | 20,382,500 |
| CITIBANK N.A. | 10,217,700 |
| PNB SECURITIES, INC. | 4,871,450 |
| LITONJUA SECURITIES, INC. | 3,604,720 |
| SECURITIES SPECIALISTS, INC. | 3,492,700 |
| COL Financial Group, Inc. | 2,947,416 |
| SunSecurities, Inc. | 2,248,100 |
| THE FIRST RESOURCES MANAGEMENT & SECURITIES CORP. | 2,152,400 |
| GUILD SECURITIES, INC. | 1,972,261 |
| ABACUS SECURITIES CORPORATION | 1,830,110 |
| FIRST METRO SECURITIES BROKERAGE CORP. | 1,728,268 |
| BPI SECURITIES CORPORATION | 1,690,943 |
| 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 | 1,346,100 |
| LANDBANK SECURITIES, INC. | 1,328,100 |
| THE HONGKONG AND SHANGHAI BANKING CORP. LTD. -CLIENTS' ACCT. | 1,149,500 |
| EVERGREEN STOCK BROKERAGE & SEC., INC. | 1,099,000 |
| SAN MIGUEL YAMAMURA PACKAGING CORP. RETIREMENT PLAN | 793,600 |
| R. NUBLA SECURITIES, INC. | 782,600 |
| UNICAPITAL SECURITIES INC. | 717,100 |
| MERCANTILE SECURITIES CORP. | 648,000 |
| TRITON SECURITIES CORP. | 528,900 |
| AB CAPITAL SECURITIES, INC. | 524,389 |
| PAPA SECURITIES CORPORATION | 508,700 |
| REGINA CAPITAL DEVELOPMENT CORPORATION | 504,000 |
| LARRGO SECURITIES CO., INC. | 448,900 |
| TOWER SECURITIES, INC. | 418,300 |
| E. CHUA CHIACO SECURITIES, INC. | 414,100 |
| PHILSTOCKS FINANCIAL INC | 408,706 |
| MAYBANK SECURITIES, INC. | 347,400 |
| LOPEZ, LOCSIN, LEDESMA & CO., INC. | 325,000 |
| RTG & COMPANY, INC. | 321,000 |

| | |
|--|---------|
| DAVID GO SECURITIES CORP. | 313,500 |
| ALAKOR SECURITIES CORPORATION | 301,900 |
| SOLAR SECURITIES, INC. | 273,000 |
| DA MARKET SECURITIES, INC. | 265,000 |
| R. COYIUTO SECURITIES, INC. | 262,700 |
| EASTERN SECURITIES DEVELOPMENT CORPORATION | 252,500 |
| MANDARIN SECURITIES CORPORATION | 250,000 |
| OPTIMUM SECURITIES CORPORATION | 236,700 |
| BELSON SECURITIES, INC. | 230,000 |
| STANDARD SECURITIES CORPORATION | 218,400 |
| UPCC SECURITIES CORP. | 212,500 |
| JSG SECURITIES, INC. | 210,500 |
| PREMIUM SECURITIES, INC. | 210,000 |
| AP SECURITIES INCORPORATED | 208,000 |
| SINCERE SECURITIES CORPORATION | 200,000 |
| RCBC SECURITIES, INC. | 198,100 |
| MERIDIAN SECURITIES, INC. | 195,400 |
| H. E. BENNETT SECURITIES, INC. | 193,200 |
| G.D. TAN & COMPANY, INC. | 178,000 |
| TANSENGCO & CO., INC. | 173,700 |
| GOLDEN TOWER SECURITIES & HOLDINGS, INC. | 172,400 |
| STRATEGIC EQUITIES CORP. | 171,800 |
| WEALTH SECURITIES, INC. | 168,400 |
| CAMPOS, LANUZA & COMPANY, INC. | 157,100 |
| QUALITY INVESTMENTS & SECURITIES CORPORATION | 154,000 |
| SB EQUITIES, INC. | 150,000 |
| HDI SECURITIES, INC. | 142,900 |
| ALPHA SECURITIES CORP. | 137,000 |
| F. YAP SECURITIES, INC. | 129,500 |
| NEW WORLD SECURITIES CO., INC. | 126,400 |
| SUMMIT SECURITIES, INC. | 120,000 |
| GLOBALINKS SECURITIES & STOCKS, INC. | 109,000 |
| VENTURE SECURITIES, INC. | 107,400 |
| FIDELITY SECURITIES, INC. | 102,000 |
| GINEBRA SAN MIGUEL, INC. RETIREMENT PLAN | 100,600 |
| A. T. DE CASTRO SECURITIES CORP. | 94,000 |
| SUPREME STOCKBROKERS, INC | 85,000 |
| YAO & ZIALCITA, INC. | 80,000 |
| LUCKY SECURITIES, INC. | 77,000 |
| DIVERSIFIED SECURITIES, INC. | 70,200 |
| APEX PHILIPPINES EQUITIES CORPORATION | 65,000 |
| GOLDSTAR SECURITIES, INC. | 58,000 |
| PLATINUM SECURITIES, INC. | 55,000 |
| ANSALDO, GODINEZ & CO., INC. | 54,500 |

| | |
|--|--------------------|
| EQUITIWORLD SECURITIES, INC. | 52,900 |
| STANDARD CHARTERED BANK | 50,000 |
| MDR SECURITIES, INC. | 47,100 |
| A & A SECURITIES, INC. | 44,200 |
| PAN ASIA SECURITIES CORP. | 40,000 |
| EAGLE EQUITIES, INC. | 40,000 |
| IMPERIAL, DE GUZMAN, ABALOS & CO., INC. | 39,700 |
| 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 |
| 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 |
| DRAGONFI SECURITIES, INC. | 5,417 |
| TIMSON SECURITIES, INC. | 4,600 |
| SARANGANI SECURITIES, INC. | 2,000 |
| FIRST ORIENT SECURITIES, INC. | 1,000 |
| I. B. GIMENEZ SECURITIES, INC. | 500 |
| Total Lodged Shares | 293,117,820 |

Bank of Commerce

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

| For the period ended | September 30, 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 | 293,117,820 |
| PCD Nominee (Filipino) | 151,510,654 |
| PCD Nominee (Non-Filipino) | 141,607,166 |
| Number of Certificated Common Shares | 1,109,896,100 |