



13 October 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 September 2025

Mesdames:

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, 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 30 September 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	301,713,070
PCD Nominee - Filipino	159,707,804
PCD Nominee - Non-Filipino	142,005,266
Number of Certificated Common Shares	1,101,300,850

Change from previous submission

There is a difference of 10,600 common shares between the Number of Certificated Shares as of September 30, 2025 (1,101,300,850 common shares) and the Number of Certificated Shares as of June 30, 2025 (1,101,290,250 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, 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)	159,707,804	0	159,707,804	8.776694 %
5	PCD NOMINEE CORPORATION (NON-FILIPINO)	142,005,266	0	142,005,266	7.803857 %
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 GERVAPIO 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	JOHN JAMES CENTENO DIZON	7,000	0	7,000	0.000385 %
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	JOSELITO CORPUS HERRERA	2,500	0	2,500	0.000137 %
40	MANUEL L. MANALASTAS	2,270	0	2,270	0.000125 %
41	ROBERTO BAYOT	2,130	0	2,130	0.000117 %
42	LEOVILLO DELA CRUZ AGUSTIN	2,000	0	2,000	0.000110 %
43	GABRIELLE CLAUDIA FERRANCO HERRERA	2,000	0	2,000	0.000110 %
44	NADEZHDA ISKRA FERRANCO HERRERA	2,000	0	2,000	0.000110 %
45	MILAGROS P. VILLANUEVA	2,000	0	2,000	0.000110 %
46	MYRNA P. VILLANUEVA	2,000	0	2,000	0.000110 %
47	SAMUEL V. POBLETE	1,740	0	1,740	0.000096 %
48	MARLENE O. DE LA CRUZ	1,600	0	1,600	0.000088 %
49	ROLANDO B. MANGOBA	1,600	0	1,600	0.000088 %
50	JOSE F. ACETRE	1,060	0	1,060	0.000058 %
51	JOSEFINA E. CRUZ	1,060	0	1,060	0.000058 %
52	LUZVIMINDA GALANG	1,060	0	1,060	0.000058 %
53	ELINOR N. JAVIER	1,060	0	1,060	0.000058 %
54	MA. CHRISTINA NAKANISHI	1,060	0	1,060	0.000058 %
55	DINNA PEREZ	1,060	0	1,060	0.000058 %
56	EDMUNDO B. SANTOS	1,060	0	1,060	0.000058 %
57	WILLIAM P. SOTTO	1,060	0	1,060	0.000058 %
58	JAYBEE C. BARAQUEL	1,000	0	1,000	0.000055 %
59	JUAN CARLOS V. CABREZA	1,000	0	1,000	0.000055 %
60	MARIETTA V. CABREZA	1,000	0	1,000	0.000055 %
61	JESUS SAN LUIS VALENCIA	800	0	800	0.000044 %
62	EDITA M. AGUILAR	530	0	530	0.000029 %
63	GREGORIA CORAZON ALCALA	530	0	530	0.000029 %
64	CARLOS BANTAY	530	0	530	0.000029 %
65	LESLEY CAROL CUAYCONG	530	0	530	0.000029 %
66	FREDDIE M. DOMINGO	530	0	530	0.000029 %
67	WILFREDO T. ESGUERRA	530	0	530	0.000029 %
68	MARCIANO M. FACUN	530	0	530	0.000029 %
69	RAUL B. MARIFOSQUE	530	0	530	0.000029 %
70	ROLANDO S. SANTOS	530	0	530	0.000029 %
71	JENNIFER T. RAMOS	500	0	500	0.000027 %
72	MARIO J. ENRIQUEZ	420	0	420	0.000023 %
73	FRANCISCO A. ASTILLA IV	390	0	390	0.000021 %
74	CESAR G. DE LA CRUZ	390	0	390	0.000021 %
75	EDMUNDO COSME G. DUAY	390	0	390	0.000021 %
76	JOSELITO L. AGUSTIN	260	0	260	0.000014 %
77	EDGAR R. ANABO	260	0	260	0.000014 %
78	ROWENA B. BERNARDINO	260	0	260	0.000014 %
79	MARY ANN D. CONCEPCION	260	0	260	0.000014 %
80	ROGELIO D. DE LEON	260	0	260	0.000014 %

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Bank of Commerce
 STOCK TRANSFER MODULE
 List of Stockholders
 As of Sep 30, 2025

RANK	STOCKHOLDER NAME	Common	Preferred S1	TOTAL SHARES	% OF O/S
81	MA. CRISTINA A. DE VERA	260	0	260	0.000014 %
82	MANUEL C. EDRALIN	260	0	260	0.000014 %
83	JOSEPHINE DELILAH B. MENDIOLA	260	0	260	0.000014 %
84	DANTE PALOMARES	260	0	260	0.000014 %
85	ROBERTO C. PAZ	260	0	260	0.000014 %
86	ALFREDO B. PRAGIDES	260	0	260	0.000014 %
87	RITA MILANIE B. RICASIO	260	0	260	0.000014 %
88	ERNESTO A. SAN DIEGO	260	0	260	0.000014 %
89	FLORENCIA D. C. PENAFLO	210	0	210	0.000012 %
90	CERES V. PALISOC	160	0	160	0.000009 %
91	SALVADOR URSUA	160	0	160	0.000009 %
92	CYNTHIA J. GRUET	120	0	120	0.000007 %
93	ANTONIO S. ABACAN, JR.	100	0	100	0.000005 %
94	EDWIN T. AMAHAN	100	0	100	0.000005 %
95	RENE V. BERNARDINO	100	0	100	0.000005 %
96	WINSTON A. CHAN	100	0	100	0.000005 %
97	DANILO A. DE LA CRUZ	100	0	100	0.000005 %
98	MARIZZA Z. DIZON	100	0	100	0.000005 %
99	GLORIA W. JAVIER	100	0	100	0.000005 %
100	ROSALINDA M. KATIGBAK	100	0	100	0.000005 %
		1,403,011,760	416,666,670	1,819,678,430	99.999881 %

TOTAL NO. OF OUTSTANDING SHARES : 1,819,680,590
 TOTAL NO. OF DISTINCT STOCKHOLDERS : 161
 TOTAL NO. OF ACCOUNTS : 161

OUTSTANDING BALANCES FOR SPECIFIC COMPANY
September 30, 2025
BNCOM0000000

BPNAME	QUANTITY
R. S. LIM & CO., INC.	92,850,900
PHILIPPINE EQUITY PARTNERS, INC.	46,609,700
BA SECURITIES, INC.	23,291,800
BDO SECURITIES CORPORATION	23,037,570
GOVERNMENT SERVICE INSURANCE SYSTEM	20,932,400
BANK OF COMMERCE - TRUST SERVICES GROUP	20,154,100
CITIBANK N.A.	10,217,700
EASTWEST BANKING CORPORATION - TRUST DIVISION	8,607,850
FIRST METRO SECURITIES BROKERAGE CORP.	4,957,380
PNB SECURITIES, INC.	4,913,350
LITONJUA SECURITIES, INC.	3,604,720
COL Financial Group, Inc.	3,422,380
SECURITIES SPECIALISTS, INC.	2,712,100
SunSecurities, Inc.	2,245,100
THE FIRST RESOURCES MANAGEMENT & SECURITIES CORP.	2,152,200
CABALLES GO SECURITIES INC	1,941,950
R. NUBLA SECURITIES, INC.	1,917,200
BPI SECURITIES CORPORATION	1,881,694
ABACUS SECURITIES CORPORATION	1,730,610
ASIASEC EQUITIES, INC.	1,485,000
SAN MIGUEL BREWERY INC. RETIREMENT PLAN	1,400,000
CHINA BANK SECURITIES CORPORATION	1,398,900
AAA SOUTHEAST EQUITIES, INCORPORATED	1,396,400
E. CHUA CHIACO SECURITIES, INC.	1,338,100
LANDBANK SECURITIES, INC.	1,274,700
EVERGREEN STOCK BROKERAGE & SEC., INC.	1,234,000
THE HONGKONG AND SHANGHAI BANKING CORP. LTD. -CLIENTS' ACCT.	1,149,500
SAN MIGUEL YAMAMURA PACKAGING CORP. RETIREMENT PLAN	793,600
MERCANTILE SECURITIES CORP.	615,000
TOWER SECURITIES, INC.	608,300
PAPA SECURITIES CORPORATION	573,900
TRITON SECURITIES CORP.	523,900
REGINA CAPITAL DEVELOPMENT CORPORATION	519,000
PHILSTOCKS FINANCIAL INC	468,424
UNICAPITAL SECURITIES INC.	450,000
LARRGO SECURITIES CO., INC.	448,900
SB EQUITIES,INC.	371,200
SOLAR SECURITIES, INC.	343,000
DAVID GO SECURITIES CORP.	313,500
AB CAPITAL SECURITIES, INC.	308,453
PREMIUM SECURITIES, INC.	305,700

EASTERN SECURITIES DEVELOPMENT CORPORATION	302,500
ALAKOR SECURITIES CORPORATION	290,000
RTG & COMPANY, INC.	283,700
R. COYIUTO SECURITIES, INC.	273,800
MANDARIN SECURITIES CORPORATION	249,100
LOPEZ, LOCSIN, LEDESMA & CO., INC.	225,000
OPTIMUM SECURITIES CORPORATION	216,700
UPCC SECURITIES CORP.	212,500
SINCERE SECURITIES CORPORATION	200,000
G.D. TAN & COMPANY, INC.	198,000
H. E. BENNETT SECURITIES, INC.	195,400
MERIDIAN SECURITIES, INC.	191,900
BELSON SECURITIES, INC.	190,000
TANSENGCO & CO., INC.	177,700
STRATEGIC EQUITIES CORP.	171,800
RCBC SECURITIES, INC.	169,500
CNN SECURITIES, INC.	167,900
WEALTH SECURITIES, INC.	164,200
GOLDEN TOWER SECURITIES & HOLDINGS, INC.	162,400
MAYBANK SECURITIES, INC.	162,300
CAMPOS, LANUZA & COMPANY, INC.	154,600
QUALITY INVESTMENTS & SECURITIES CORPORATION	154,000
NEW WORLD SECURITIES CO., INC.	141,400
PAN ASIA SECURITIES CORP.	140,000
YAO & ZIALCITA, INC.	140,000
ALPHA SECURITIES CORP.	122,000
AP SECURITIES INCORPORATED	117,800
STANDARD SECURITIES CORPORATION	116,000
JSG SECURITIES, INC.	110,500
GLOBALINKS SECURITIES & STOCKS, INC.	109,000
VENTURE SECURITIES, INC.	106,700
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
LUCKY SECURITIES, INC.	77,000
DIVERSIFIED SECURITIES, INC.	70,200
DRAGONFI SECURITIES, INC.	70,078
A & A SECURITIES, INC.	69,200
F. YAP SECURITIES, INC.	66,700
APEX PHILIPPINES EQUITIES CORPORATION	65,000
ANSALDO, GODINEZ & CO., INC.	62,500
GOLDSTAR SECURITIES, INC.	58,000
DA MARKET SECURITIES, INC.	55,000
PLATINUM SECURITIES, INC.	55,000
EQUITIWORLD SECURITIES, INC.	52,900
STANDARD CHARTERED BANK	50,000

MDR SECURITIES, INC.	47,100
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
GUILD SECURITIES, INC.	30,211
CTS GLOBAL EQUITY GROUP, INC.	26,000
VC SECURITIES CORPORATION	26,000
INVESTORS SECURITIES, INC,	23,900
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.	4,400
FIRST ORIENT SECURITIES, INC.	1,000
I. B. GIMENEZ SECURITIES, INC.	500
LUNA SECURITIES, INC.	100
TOTAL LODGED SHARES	301,713,070



Bank of Commerce

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

For the period ended	September 30, 2025 Calendar
Number of Issued Common Shares	1,403,013,920
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