



SEC FORM – I-ACGR

INTEGRATED ANNUAL CORPORATE GOVERNANCE REPORT

1. For the fiscal year ended **December 31, 2021**
2. SEC Identification Number **11341**
3. BIR Tax Identification No. **000-051-037**
4. Exact name of issuer as specified in its charter **BENGUET CORPORATION**
5. **Metro Manila, Philippines**
Province, Country or other jurisdiction of
incorporation or organization
6. (SEC Use Only)
Industry Classification Code:
7. **7th Floor, Universal Re Building, 106 Paseo de Roxas, Makati City** **1226**
Address of principal office Postal Code
8. **(632) 88121380 / 77519137**
Issuer's telephone number, including area code
9. **Not applicable**
Former name, former address, and former fiscal year, if changed since last report.

INTEGRATED ANNUAL CORPORATE GOVERNANCE REPORT

INTEGRATED ANNUAL CORPORATE GOVERNANCE REPORT			
	COMPLIANT/ NON-COMPLIANT	ADDITIONAL INFORMATION	EXPLANATION
The Board's Governance Responsibilities			
Principle 1: The company should be headed by a competent, working board to foster the long-term success of the corporation, and to sustain its competitiveness and profitability in a manner consistent with its corporate objectives and the long-term best interests of its shareholders and other stakeholders.			
Recommendation 1.1			
1	Compliant	<p>Provide information or link/reference to a document containing information on the following:</p> <p>1. Academic qualifications, industry knowledge, professional experience, expertise and relevant trainings of directors</p> <p>The Company's Board is composed of directors with collective working knowledge, experience or expertise that is relevant to mining industry. This is contained in the Information Statement and the Management Reports provided to Shareholders.</p> <p>Please refer to BC website:</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/Dec-31-2021-Directors-and-Officers.pdf</p> <p>Please see 2021 Annual Report SEC Form 17-A on pages 33-36 and 2021 Definitive Information Statement (SEC Form 20-IS) pages 11-14 on brief descriptions of the business experience of directors, years appointed, qualifications and expertise of the Board of Directors disclosed in PSE Edge Portal and posted in BC website (pages 24-27 of 228)</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p>	
2	Compliant		
3	Compliant		

		<p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9</p> <p>http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf</p> <p>Relevant Trainings of Directors</p> <p>Please refer to 2021 training and continuous education of Directors under Company Disclosures in PSE Edge Portal announce date Nov. 17, 2021 (for Directors BM Villegas, RS Velasco, LG Fernandez, MR Pompidou, JHT Andres, JRE Paras, APR Casiño, RL Dapula, LJJ Virata, KYI Chan and AM Te)</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=9583a7db18e946ee5d542af6f1e997b9</p> <p>and posted in BC website under Corporate Governance.</p> <p>http://benguetcorp.com/wp-content/uploads/2021/11/Attendance-to-CG-Seminar-2021_Directors-and-Officers-w-SEC-stamped-rcvd.pdf</p> <p>2. Qualification standards for directors to facilitate the selection of potential nominees and to serve as benchmark for the evaluation of its performance</p> <p>Please see qualification standards for directors on page 5 Art. III par. 3.4 of Manual of Corp Governance (MCG).</p> <p>http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>Please refer to the Company’s Board Charter – Article 1 (1) on the composition of the Board-p. 1; Article 1 (2) on the qualification of the board members-p.2; Article IV (1) on Board Diversity-p.10</p> <p>http://benguetcorp.com/wp-content/uploads/2020/07/P1-Board-Charter.pdf</p>	
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Recommendation 1.2				
1	Board is composed of a majority of non-executive directors.	Compliant.	<p>Identify or provide link/reference to a document identifying the directors and the type of their directorships</p> <p>As of December 31, 2021, the Chairman and all members of the board are non-executive directors, except for Atty. Lina G. Fernandez, who is an executive director and holding the position of President. Please refer to the Company's website under tab "About Us" -> "Our Company ~Directors & Officers". http://benguetcorp.com/wp-content/uploads/2022/05/Dec-31-2021-Directors-and-Officers.pdf</p> <p>Please refer to GIS 2021 page 4 posted in BC website http://benguetcorp.com/wp-content/uploads/2022/04/BC-2021-GIS_notarized.pdf</p> <p>and results of 2021 Annual Stockholders' Meeting (ASM) under Company Disclosures in PSE Edge Portal announce date Nov. 11, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=1a4e2a01194ddf045d542af6f1e997b9</p> <p>Please refer to Minutes of ASM held on Nov. 10, 2021 posted in BC website http://benguetcorp.com/wp-content/uploads/2022/05/Minutes-of-10-November-2021-ASM.pdf</p> <p>Please refer to Annex "A" on Type of Directorship.</p> <p>Please refer also to the Company's 2021 Annual Report SEC Form 17-A pages 33-35 and DIS (SEC Form 20-IS) pp. 11-14 describing qualifications of each director posted in the Company's website and disclosed in PSE Edge Portal under BC Company disclosures: http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p>	

			https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9	
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Recommendation 1.3				
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1	Company provides in its Board Charter and Manual on Corporate Governance a policy on training of directors.	Compliant	<p>Provide information or link/reference to a document containing information on the orientation program and trainings of directors for the previous year, including the number of hours attended and topics covered.</p> <p>1. Please refer to Board Charter Art. IV 7.b page 13 and MCG 3.11(b) page 14 providing for policy on training of directors.</p> <p>2. Due to LGU’s restrictions, an orientation program was conducted in Baguio last April 28, 2022, including safety orientation and presentation of gold operations.</p> <p>Please refer to the Company’s MCG, Art. III, par 3.11 on page 14 posted in website under tab “Corporate Governance” -> “Manual on Corporate Governance”. All new directors joining the Board are required to undergo orientation program http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf and Board Charter on page 13, Art. IV, par 7 http://benguetcorp.com/wp-content/uploads/2020/07/P1-Board-Charter.pdf.</p> <p>3. 2021 Training and Continuing Education for BC Board of Directors The Company held its corporate governance seminar last Nov. 12, 2021 with Center for Training and Development Inc., SEC accredited CG seminar provider. The CG training-seminar covered the following topics:</p>	
2	Company has an orientation program for first time directors	Compliant		
3	Company has relevant annual continuing training for all directors	Compliant		

			<ol style="list-style-type: none"> 1) Updates on SEC issuances; 2) Compliance with DOLE Regulations during the pandemic; 3) CREATE Law; 4) Corporate Governance Updates <p>Please refer to the attendance of the Board of Directors posted in website under tab “Corporate Governance” -> “ACGR” http://benguetcorp.com/wp-content/uploads/2021/11/Attendance-to-CG-Seminar-2021_Directors-and-Officers-w-SEC-stamped-rcvd.pdf</p> <p>PSE Edge Portal BC under Company Disclosures announce date Nov. 17, 2021. https://edge.pse.com.ph/openDiscViewer.do?edge_no=9583a7db18e946e5d542af6f1e997b9</p>	
Recommendation 1.4				
1	Board has a policy on board diversity.	Compliant	<p>Provide information on or link/reference to a document containing information on the company’s board diversity policy. Indicate gender composition of the board.</p> <p>Board Diversity The Company’s 2021 Board of Directors includes three women, (30% of the board), one of whom is an independent director. Members of the Board have diverse profound background.</p> <p>Please refer to the Company’s MCG on page 4, Art. III par 3.2 posted in website under tab “Corporate Governance” -> “Manual on Corporate Governance” on policy statement on Board Diversity http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf.</p> <p>As stated in the Board Diversity Policy statement and Board Charter (Article IV #1), “No director or candidate for directorship shall be discriminated upon by reason of gender, age, disability, ethnicity, nationality or political, religious or cultural backgrounds.”</p>	

			<p>Please refer to website under tab “Corporate Governance” -> “Policies-> Board Diversity Policy http://benguetcorp.com/corporate-governance/policies/.</p> <p>Please refer to pages 33, 34 and 36 of 439 pages of 2021 Annual Report on profiles of 3 female directors: Mesdames Maria Remedios Paz R. Pompidou, Rhodora L. Dapula and Lina G. Fernandez as disclosed in PSE Edge Portal announce date May 16, 2022 and posted in BC website. http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p>	
Optional: Recommendation 1.4				
1	Company has a policy on and discloses measurable objectives for implementing its board diversity and reports on progress in achieving its objectives.		Provide information on or link/reference to a document containing the company’s policy and measurable objectives for implementing board diversity. Provide link or reference to a progress report in achieving its objectives.	
Recommendation 1.5				
1	Board is assisted by a Corporate Secretary.	Compliant	Provide information on or link/reference to a document containing information on the Corporate Secretary, including his/her name, qualifications, duties and functions.	
2	Corporate Secretary is a Separate individual from the Compliance Officer.	Compliant	The Board is assisted by a Corporate Secretary that is a separate individual from the Chief Compliance Officer and is not a member of the Board.	
3	Corporate Secretary is not a Member of the Board of Directors.	Compliant	BC’s Corporate Secretary is Atty. Hermogene H. Real, whereas the Company’s Compliance Officer is Mr. Max D. Arceño. Atty. Real’s qualifications/brief profile is stated in 2021 Annual Report/SEC 17-A, page 38 and 2021 SEC 20-IS, page 16 disclosed in PSE Edge Portal and posted in BC website. Atty. Real is not a member of the BOD.	

			<p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>Info Statement</p> <p>http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9</p> <p>For Corporate Secretary's duties and functions, please refer also to MCG Article 5, 5.3 pp. 22-23</p> <p>http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf.</p> <p>Please refer also to Amended By-Laws page 18 Article IV, Section 4 on duties of Corp. Secretary posted in BC website</p> <p>http://benguetcorp.com/wp-content/uploads/2020/01/Jan-2020_Amended-Bylaws.pdf.</p>	
4	Corporate Secretary attends training/s on corporate governance	Compliant	<p>Provide information or link/reference to a document containing information on the corporate governance training attended, including number of hours and topics covered</p> <p>The Corporate Secretary, Atty. Hermogene Real, was issued a CERTIFICATE OF ATTENDANCE dated November 12, 2021 by SEC accredited seminar provider, Center for Training and Development, Inc. for training-seminar on "Embracing Good Corporate Governance for Effective and Efficient Management" (Annex "B"). The Programme for the said seminar indicated topics discussed with four (4) training hours (Annex "B-1").</p> <p>Please refer to the Company's disclosure on the attendance of Directors and Officers to the Corporate Governance seminar posted in</p>	

			<p>BC website and disclosed in PSE Edge Portal announce date Nov. 17, 2021.</p> <p>http://benguetcorp.com/wp-content/uploads/2021/11/Attendance-to-CG-Seminar-2021_Directors-and-Officers-w-SEC-stamped-rcvd.pdf</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=9583a7db18e946ee5d542af6f1e997b9</p>	
Optional recommendation 1.5				
1	Corporate Secretary distributes materials for board meetings at least five business days before scheduled meeting.			
Recommendation 1.6				
1	Board is assisted by a Compliance Officer.	Compliant	Provide information on or link/reference to a document containing information on the Compliance Officer, including his/her name, position, qualifications, duties and functions.	
2	Compliance Officer has a rank of Senior Vice President or an equivalent position with adequate stature and authority in the Corporation	Compliant	<p>The Board is assisted by a Chief Compliance Officer with a rank of Senior Vice President and is not a member of the Board. As guided by the MCG, the Board ensures that it is assisted by a Compliance Officer, who has a rank of Senior Vice President or an equivalent position with adequate stature and authority in the Corporation. Please see MCG Article 5, page 23.</p> <p>http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p>	
3	Compliance Officer is not a member of the board	Compliant	<p>The Company's Compliance Officer, Mr. Max D. Arceño, held the position Senior Vice President for Finance & Treasurer. Please see 2021 Annual Report SEC Form 17-A page 37 of 439 pp and 2021 DIS (SEC 20-IS) page 15 announce date Oct. 13, 2021 disclosed in PSE Edge Portal and posted in BC website on her qualifications.</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p>	

			<p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9</p> <p>Please refer also to page 4 of the Company’s 2021 GIS with actual annual meeting date of Nov. 10, 2021 posted in BC website and disclosed in PSE Edge Portal announce date Nov 26, 2021.</p> <p>http://benguetcorp.com/wp-content/uploads/2022/04/BC-2021-GIS_notarized.pdf</p> <p>PSE Edge Portal – Other SEC Reports and Requirements Nov 26, 2021</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=db0912e85e05d0275d542af6f1e997b9</p> <p><u>Duties and Responsibilities of Compliance Officer</u></p> <p>Please refer to BC’s MCG Article 5, par. 5.4 page 23-24.</p> <p>http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p>	
4	Compliance Officer attends training/s on corporate governance.	Compliant	<p>Provide information on or link/reference to a document containing information on the corporate governance training attended, including number of hours and topics covered</p> <p>The Chief Compliance Officer attends trainings on corporate governance (please see attached Annex “C”).</p> <p>Please refer to the Company’s disclosure on the attendance of Directors and Officers to the 2021 Corporate Governance seminar posted in BC website and in PSE Edge Portal announce date Nov. 26, 2021:</p> <p>http://benguetcorp.com/wp-content/uploads/2021/11/Attendance-to-CG-Seminar-2021_Directors-and-Officers-w-SEC-stamped-rcvd.pdf</p>	

			https://edge.pse.com.ph/openDiscViewer.do?edge_no=9583a7db18e946ee5d542af6f1e997b9	
Please see attached Annex "B-1" on topics covered in corporate governance training with a total of 4 hours.				

Principle 2: The fiduciary roles, responsibilities and accountabilities of the Board as provided under the law, the company's articles and by-laws, and other legal pronouncements and guidelines should be clearly made known to all directors as well as to stockholders and other stakeholders.

Recommendation 2.1

1	Directors act on a fully informed basis, in good faith, with due diligence and care, and in the best interest of the company.	Compliant	<p>Provide information or reference to a document containing information on how the directors performed their duties (can include board resolutions, minutes of meeting)</p> <p><u>Duties and Responsibilities of Board of Directors</u></p> <p>Article II (4) of Board Charter states that members of the Board shall attend and actively participate in all regular and special meetings of the board and its committees, in person or through teleconference or videoconferencing.</p> <p>http://benguetcorp.com/wp-content/uploads/2020/07/P1-Board-Charter.pdf</p> <p>Directors actively participated in all regular board and committee meetings. Directors were provided with materials at least 1-3 days ahead of the date of the meeting. The Board had 4 meetings (3 regular and 1 Organizational BOD meetings) for 2021 excluding the ASM. For 2021, Audit Committee had 2 meetings, Salary & Stock Option Committee had 2 meetings, Board Risk Oversight Committee had 2 meetings, Executive Committee had 1 meeting and Nomination Committee had 1 meeting.</p> <p>Summary of attendance to board meetings of directors was reported to SEC as part of SEC's reportorial requirement. Please refer to this link posted in BC website</p>	
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Recommendation 2.2				
1	Board oversees the development, review and approval of the company’s business objectives and strategy.	Compliant	<p>Provide information or link/reference to a document containing information on how the directors performed this function (can include board resolutions, minutes of meeting). Indicate frequency of review of business objective and strategy</p> <p>The Board oversees the development, review and approval of the company’s business objectives and strategy.</p>	
2	Board oversees and monitors the implementation	Compliant	<p>The Board reviews and approves the company’s business objectives and strategies as presented by management every board meeting. The</p>	

	<p>of the company's business objectives and strategy.</p>		<p>management reports to the Board all updates and changes (if any) in the company's business objectives and strategy. Please refer to MCG page 11. http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>Please refer to pp 5-10 of 50 pp 2021 Annual Report, Part 1, item 1 on Business in PSE Edge Portal Annual Report announce date May 16, 2022 and in BC website https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>The Board monitors implementation of BOD approved company's business objectives and strategies as presented by management every board meeting. The management presents to the Board all updates and issues on the company's business objectives and strategies on every Board meeting. Please refer to MCG page 11. http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>Directors actively attend regular/special board and committee meetings. Directors are provided with materials several days ahead of the date of the meeting. The Board had 4 meetings for 2021 excluding the ASM. http://benguetcorp.com/wp-content/uploads/2022/01/SEC-Form-17-C_Advisement-on-Attendance-of-Directors-to-Board-Meetings-2021.pdf https://edge.pse.com.ph/openDiscViewer.do?edge_no=827e5f93b516a3253470cea4b051ca8f</p>	
Supplement to Recommendation 2.2				
1	Board has a clearly defined and updated vision, mission and core values.	Compliant	<p>Indicate or provide link/reference to a document containing the company's vision, mission and core values. Indicate frequency of review of the vision, mission and core values.</p>	

			<p>Please refer to BC website under tab “About us” http://benguetcorp.com/about-us/.</p> <p>Please refer also to the Board Charter page 8 which states that one of the general responsibilities of the Board is to determine the Company’s purpose, its vision and mission and strategies to carry out its objectives. http://benguetcorp.com/wp-content/uploads/2020/07/P1-Board-Charter.pdf</p> <p>Please refer also to MCG’s Annex A page 37 http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf.</p> <p>The Board reviews the Vision and Mission annually. Please see Board Charter page 13 Article IV, par. 8 (b) which states: “Management Advisory Board has been created and tasked to specifically accelerate and immediately support the Company’s short-term operational and profitability plan and strategic long-term sustainability plan. It shall review, at least annually, the strategic plans of the management.” http://benguetcorp.com/wp-content/uploads/2020/07/P1-Board-Charter.pdf</p>	
2	Board has a strategy execution process that facilitates effective management performance and is attuned to the company’s business environment, and culture.	Compliant	<p>Provide information on or link/reference to a document containing information on the strategy execution process.</p> <p>The Company regularly calls for operations committee meeting (Opcom)/management committee meetings (Mancom) and financial reviews for gold and nickel projects, and other subsidiaries’ businesses. The Mancom/Opcom meetings are intended to monitor the effectiveness of implementation of the Company’s business objectives and strategy on a periodic basis as well as environment and regulatory compliance.</p> <p>The finance team reviews and monitors budget and financial performance of each operation/subsidiary compared to the business plan and corporate objectives for the year and forecast revenue for</p>	

			<p>the year which in turn are submitted and reported to the Board of Directors. Please see attached Annex “D” - Certification signed by the President and EVP on the Opcom/Mancom meetings held in 2021.</p> <p>Please refer to Board Charter page 13 Article IV par 8 a) http://benguetcorp.com/wp-content/uploads/2020/07/P1-Board-Charter.pdf.</p>	
Recommendation 2.3				
1	Board is headed by a competent and qualified Chairperson.	Compliant	<p>Provide information or reference to a document containing information on the Chairperson, including his/her name and qualifications</p> <p>The Board is headed by a competent and qualified Chairperson. The Company’s Chairman is Dr. Bernardo M. Villegas who assumed the position effective November 7, 2019 to present.</p> <p>Please refer to Dr. Bernardo M. Villegas’ qualifications indicated on page 35 of 439 pp of 2021 Annual Report SEC Form 17-A in PSE Edge Portal announce date May 16, 2022 and posted in the Company’s website. http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>Dr. Bernardo M. Villegas’ qualifications are also indicated on page 13 of Information Statement posted in BC website and in PSE Edge Portal. http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9</p> <p>Please see page 4 of Nov 2021 GIS with Dr. Bernardo Villegas as Chairman of the Board posted in BC website and in PSE Edge Portal. http://benguetcorp.com/wp-content/uploads/2020/12/2020-GIS.pdf</p>	

			http://benguetcorp.com/wp-content/uploads/2022/04/BC-2021-GIS_notarized.pdf https://edge.pse.com.ph/openDiscViewer.do?edge_no=db0912e85e05d0275d542af6f1e997b9	
			<p>This is also pursuant to Article V, 5.1 of the MCG which states that the Board should be headed by a competent and qualified chairperson, p. 21-22.</p> http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf	
Recommendation 2.4				
1	Board ensures and adopts an effective succession planning program for directors, key officers and management.	Compliant	<p>Disclose and provide information or link/reference to a document containing information on the company's succession planning policies and programs and its implementation</p> <p>The Company, by practice, adopts a Succession Program based on its 118 years of corporate existence. It is one of the general responsibilities of the Board to ensure and adopt an effective succession planning program for directors, key officers and management. The Corporate Governance Committee shall recommend succession plan for the board members and senior officers. Pls refer to p. 20, MCG, Art IV.4.5.b.iv.</p> http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf	
2	Board adopts a policy on the retirement for directors and key officers	Compliant	<p>Please refer to MCG on page 10, par. 3.8 A.b)</p> http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf	
			<p>Please refer also to Board Charter, page 8 Article III.A. b)</p> http://benguetcorp.com/wp-content/uploads/2020/07/P1-Board-Charter.pdf	
			<p>The Board adopts a policy on the retirement for key officers and managers.</p> <p>BC adopts a policy on the retirement of key officers and managers.</p>	

			<p>BC has an existing Integrated Retirement Plan. Please refer to 2021 Annual Report SEC Form 17-A, page 39 of 50 pp disclosed in PSE Edge Portal and in the Company’s website.</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>The Company maintains a qualified, noncontributory trusted pension plan covering substantially all of its executive officers and employees. Normal retirement age under the plan is age 60, except for non-supervisory underground mine workers who have the option to retire at age 55. An employee shall also be entitled to a benefit equal to 50% of his monthly basic salary or the normal benefit, whichever is higher, if his employment is terminated for reasons beyond his control, such as death, disability or government policy. Benefits are dependent on the years of service and the respective employee’s compensation.</p>	
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Recommendation 2.5

1	Board aligns the remuneration of key officers and board members with long-term interests of the company.	Compliant	<p>Provide information on or link/reference to a document containing information on the company’s remuneration policy and its implementation, including the relationship between remuneration and performance.</p> <p>The HR Dept. and Salary & Stock Option Committee of the Board align the remuneration of managers, key officers, and board members with long-term interests of the company.</p> <p>Please refer to the Company’s MCG, Art. III, par. 3.9 on pages 12-13: http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf.</p>	
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			<p>Please see the Company's 2021 Annual Report SEC Form 17-A page 39 of 50 pages Item 10 on Executive Compensation disclosed in PSE Edge Portal and posted in BC website: https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>Please see amended by-laws Article IV Sec 1(c) page 70 http://benguetcorp.com/wp-content/uploads/2020/01/Jan-2020_Amended-Bylaws.pdf</p> <p>Please refer also to MCG pages 14-15 that best describes the duties and responsibilities of Salary & Stock Option Committee http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p>	
2	Board adopts a policy specifying the relationship between remuneration and performance.	Compliant	<p>Please refer to MCG p 14-15 where it is stated that it is the Salary & Stock Option Committee's duties to establish a formal and transparent procedure and develop a policy for determining acceptable remuneration of directors and officers and provide oversight over remuneration of senior management and key personnel ensuring that compensation is consistent with the Company's culture, strategy and business environment under which it operates. http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p>	
3	Directors do not participate in discussions or deliberations involving his/her own remuneration.	Compliant	<p>No Director is involved in deciding his or her own remuneration. Please refer to the Company's MCG, Art. III, par. 3.9.b on page 12. http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p>	
Optional Recommendation 2.5				
1	Board approves the remuneration of senior executives.		Provide proof of board approval	

2	Company has measurable standards to align the performance-based remuneration of the executive directors and senior executives with long-term interest, such as claw back provision and deferred bonuses.		Provide information on or link/reference to a document containing measurable standards to align performance-based remuneration with the long-term interest of the company.	
Recommendation 2.6				
1	Board has a formal and transparent board nomination and election policy.	Compliant	Provide information or reference to a document containing information on the company's nomination and election policy and process and its implementation, including the criteria used in selecting new directors, how the shortlisted candidates and how it encourages nominations from shareholders.	
2	Board nomination and election policy is disclosed in the company's Manual of Corporate Governance.	Compliant	<p>Please refer to Nominations and Election Committee Charter posted in BC website. This charter serves as the Company's Policy regarding the rules and standards to be followed in nomination and election of directors vis-à-vis BC By-Laws and Manual of Corporate Governance. http://benguetcorp.com/wp-content/uploads/2020/07/Nominations-and-Election-Comm-Charter.pdf</p> <p>Please refer to the Company's MCG, Art. IV, par. 4.1 on page 14 http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>The Company has been following the provisions in its By-laws (Article 3 Section 1.1 and Section 2 page 13). http://benguetcorp.com/wp-content/uploads/2018/05/Jul-2016-Amended-BC-By-laws.pdf</p>	
3	Board nomination and election policy includes how the company accepted nominations from minority shareholders.	Compliant	MCG page 14 Article IV, 4.1 states that the nomination committee shall pre-screen and shortlist all candidates nominated (including nominees from minority stockholders) to become member of the Board of Directors and other appointments that require board approval in accordance with the qualifications and disqualifications set forth in this Manual of Corporate Governance and Company's By-laws.	

			<p>http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>The shortlist of nominees for election of directors and independent directors in November 10, 2021 Annual Stockholders' Meeting is presented on pages 11-14 of 2021 DIS (SEC 20-IS). The independent directors were nominated by minority stockholders. Please refer to page 10 of DIS (SEC 20-IS) disclosed in PSE Edge Portal announce date Oct 13, 2021 and posted in BC website:</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9</p> <p>http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf</p>	
4	Board nomination and election policy includes how the board shortlists candidates.	Compliant	<p>The Nomination & Election Committee Charter lists the criteria which the committee may consider in recommending candidate for election to the Board.</p> <p>http://benguetcorp.com/wp-content/uploads/2020/07/Nominations-and-Election-Comm-Charter.pdf</p> <p>The Nomination Committee has the special duty of defining the general profile of the Board members that the Company may need and ensuring appropriate knowledge, competence and expertise that complement the existing skills of the Board (MCG, Art IV. 4.1.d) p. 14</p> <p>http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf.</p> <p>The shortlist of candidates for election of Directors in the November 10, 2021 ASM was presented in the DIS part 1, page 11-14 posted in BC website and disclosed in PSE Edge Portal.</p> <p>http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf</p>	

			https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9	
5	Board nomination and election policy includes an assessment of the effectiveness of the Boards' processes in the nomination, election or replacement of a director.	Compliant	<p>The Nomination and Election Committee Charter Art. 1.e page 1, states that the Committee assists the Board in making assessment of the Board's effectiveness in the process of replacing or appointing new members of the Board and officers.</p> <p>http://benguetcorp.com/wp-content/uploads/2020/07/Nominations-and-Election-Comm-Charter.pdf</p> <p>The Nomination and Election Committee Charter page 1 states that the committee shall at least annually review the performance of directors and shall consider the results of such evaluation in determining whether or not to recommend the nomination of such director for an additional term in the next election.</p> <p>http://benguetcorp.com/wp-content/uploads/2020/07/Nominations-and-Election-Comm-Charter.pdf</p>	
6	Board has a process for identifying the quality of directors that is aligned with the strategic direction of the company.	Compliant	<p>It has been the practice of the Company's board to screen the background and qualifications of the nominated directors, in accordance with the MCG and Board Charter. The Nomination Committee is tasked to ensure that the quality of directors is aligned with the strategic direction of the Company.</p> <p>Please refer to the Company's MCG, Art., III, par. 3.4 on page 5 and Art IV par 4.1c on page 14.</p> <p>http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>Please refer also to Board Charter, page 5(d).</p> <p>http://benguetcorp.com/wp-content/uploads/2020/07/P1-Board-Charter.pdf.</p>	
Optional: Recommendation 2.6				
1	Company uses professional search firms or other external sources of candidates (such as director		Identify the professional search firm used or other external sources of candidates	

	databases set up by director or shareholder bodies) when searching for candidates to the board of directors.			
Recommendation 2.7				
1	Board has overall responsibility in ensuring that there is a group-wide policy and system governing related party transactions (RPTs) and other unusual or infrequently occurring transactions.	Compliant	<p>Provide information on or reference to a document containing the company's policy on related party transaction, including policy on review and approval of significant RPTs</p> <p>The Board has an overall responsibility in ensuring that there is a group-wide policy and system governing related party transactions (RPTs) and other unusual or infrequently occurring transactions.</p> <p>The Company has RPT Policy covering all related party transactions entered into or negotiated by BC and its subsidiaries, affiliates and special purpose units where the Company exerts direct/indirect control or that exerts significant Influence over the Company; its directors, officers, stockholders and related interests (DOSRI); and their Close Family Members, as well as Corresponding Persons in Affiliated Companies and other person/juridical entity whose interests may pose potential conflict with the interest of the Company. The foregoing may be identified as a related party. Please refer to RPT Policy posted in BC website.</p> <p>http://benguetcorp.com/wp-content/uploads/2019/10/Amended-Related-Party-Transaction-Policy.pdf</p> <p>It is the responsibility of the Board to adopt a system that ensures the integrity and transparency of related party transactions between the Company and its joint ventures, subsidiaries, affiliates, associates, major stockholders, officers and directors, including their spouses, children and dependent siblings and parents and of interlocking director relationship by members of the Board, MCG page 10-11. As such, the Board has constituted RPT committee tasked with reviewing all material RPTs of the Company, MCG page 20.</p> <p>http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p>	

2	RPT policy includes appropriate review and approval of material RPTs, which guarantee fairness and transparency of the transactions.	Compliant	<p>The RPT policy includes review and approval of material RPTs to guarantee fairness of transactions. Please see page 4 provision on evaluation of RPT material transactions http://benguetcorp.com/wp-content/uploads/2019/10/Amended-Related-Party-Transaction-Policy.pdf.</p> <p>SGV, as external auditors, regularly reviews all company transactions in order to be within accounting standards and to not transgress rules on RPT.</p>	
3	RPT policy encompasses all entities within the group, taking into account their size, structure, risk profile and complexity of operations.	Compliant	<p>The RPT policy includes review and approval of material RPTs entered into by related party as defined to guarantee fairness of transactions. Pls refer to RPT Policy, page 4 provision on evaluation of RPT material transactions http://benguetcorp.com/wp-content/uploads/2020/07/P3-RPT-Charter.pdf</p> <p>Identify transactions that were approved pursuant to the policy. In 2021, there were no transactions nor proposed transaction in which the registrant or any director or executive officers, any nominee for election as director, any security holder or member of their immediate families, is a party and the amount of which exceeds P500,000.00.</p> <p>Please refer to 2021 SEC 17-A, page 46 of 50 pp ITEM 12 and 2021 DIS (SEC 20-IS) pages 17-20 on CERTAIN RELATIONSHIPS AND RELATED TRANSACTIONS disclosed in PSE Edge Portal and posted in BC website. https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>Info Statement: http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf</p>	

			<p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9</p> <p>Please refer also to Note 29 on Related Party Disclosures pages 82-83 of 115 pages of 2021 Consolidated Audited Financial Statements attached to SEC 17-A under Company Disclosures in PSE Edge Portal announce date May 16, 2022</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p>	
Supplement to Recommendations 2.7				
1	<p>Board clearly defines the threshold for disclosure and approval of RPTs and categorizes such transactions according to those that are considered de minimis or transactions that need not be reported or announced, those that need to be disclosed, and those that need prior shareholder approval. The aggregate amount of RPTs within any twelve (12) month period should be considered for purposes of applying the thresholds for disclosure and approval.</p>	Compliant	<p>Provide information on a materiality threshold for RPT disclosure and approval, if any.</p> <p>Provide information on RPT categories</p> <p>The RPT policy includes a threshold provision. Please see Amended RPT Policy provision on RPT materiality threshold page 4 and internal limits for disclosure and approval, which states: “Materiality Threshold is ten percent (10%) of the BC’s total assets based on its latest audited financial statement. Since BC is a parent company, the total assets shall pertain to its total consolidated assets.”</p> <p>http://benguetcorp.com/wp-content/uploads/2019/10/Amended-Related-Party-Transaction-Policy.pdf</p> <p>Please refer to Amended RPT Policy, page 7 No. 14 for information on RPT categories, which states that for the review, approval and reporting purposes, the RPTs are categorized as Material and Immaterial.</p> <p>http://benguetcorp.com/wp-content/uploads/2019/10/Amended-Related-Party-Transaction-Policy.pdf</p> <p>SGV, as external auditor, regularly reviews all company transactions in order to be within accounting standards and to not transgress rule on RPT.</p>	

2	Board establishes a voting system whereby a majority of non-related party shareholders approve specific types of related party transactions during shareholders' meetings.	Compliant	<p>Provide information on voting system, if any.</p> <p>All RPTs are reviewed by Management Committee and RPT Committee. For material individual RPT transactions and aggregate RPT within 12-month period that breached the materiality threshold of ten percent (10%) of the Company's total assets, approval by at least two-thirds (2/3) vote of the Board of Directors, with at least a majority of the independent directors voting to approve the material RPT is required. In case that a majority of the independent directors' vote is not secured, the material RPT may be ratified by the vote of the stockholders representing at least two-thirds (2/3) of the outstanding capital stock.</p> <p>Please refer to Amended RPT Policy, page 7 http://benguetcorp.com/wp-content/uploads/2019/10/Amended-Related-Party-Transaction-Policy.pdf.</p> <p>As a matter of policy, the Company provides its shareholders with information of the RPTs for approval. Please refer to MCG pages 28-29 on voting rights. http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>Intercompany transactions are disclosed in the Company's Audited Financial Statements, including corresponding assets and liabilities arising from such transactions. This is separately disclosed in a schedule in accordance with Philippine SEC requirements under SRC Rule 68, as Amended (2011). Information regarding related party disclosure is discussed and presented on Note 29 – Related Party Disclosures of the Notes to 2021 Audited Consolidated Financial Statements of the Company. (Pages 82-83 of 115 pp of 2021 Audited Consolidated FS of Benguet Corp. and Subsidiaries, SEC 17-A) and 2021 DIS, SEC 20-IS pages 30-33 of 228 pp on Certain Relationship and Related Transactions.</p> <p>The intercompany transactions are discussed and presented on Note 29 – Related Party Disclosures of the Notes to Parent's 2021 Audited Financial Statements, pages 82-83 of 115 pages of the Consolidated FS</p>	
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			<p>of BC and Subsidiaries attached to SEC 17-A 2021 Annual Report in PSE Edge Portal under Company Disclosures announce date May 16, 2022. https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p>	
Recommendation 2.8				
1	<p>Board is primarily responsible for approving the selection of Management led by the Chief Executive Officer (CEO) and the heads of the other control functions (Chief Risk Officer, Chief Compliance Officer and Chief Audit Executive).</p>	Compliant	<p>Provide information on or reference to a document containing the Board’s policy and responsibility for approving the selection of management. Identify the Management team appointed</p> <p>The Board is primarily responsible for approving the selection of the CEO and control functions led by their respective heads: Chief Risk Officer, Chief Compliance Officer, and Chief Audit Executive. Please refer to the Company’s MCG on Art. III A(o), page 11 on General Responsibilities of the Board. http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>Please refer to Board Charter Art III, A.0 page 9 http://benguetcorp.com/wp-content/uploads/2020/07/P1-Board-Charter.pdf.</p> <p>For year 2021 (March 18. 2021 to Dec. 30, 2021), the Board appointed Atty. Lina G. Fernandez as President. Heads of control functions are Mr. Max D. Arceño as Chief Compliance Officer and Ms. Pamela M. Gendrano as Chief Risk Officer. Please refer to results of Nov. 10, 2021 organizational meeting of the Board disclosed in PSE Edge Portal and posted in BC website. https://edge.pse.com.ph/openDiscViewer.do?edge_no=1a4e2a01194ddf045d542af6f1e997b</p> <p>http://benguetcorp.com/wp-content/uploads/2021/11/Results-of-Nov-10-2021-ASM-and-Org-Mtg-of-BOD.pdf</p>	

			<p>Chief Audit/Internal Audit Head of the Company is Mr. Glenn John V. Raras. (please refer to attached Annex “E” on Mr. Raras’ qualifications).</p> <p>For 2021, appointed members of the Management Team as approved by the Board is contained in the disclosure of the results of the Organizational Meeting of the Board on November 10, 2021. Please see page 5 of Disclosure in PSE Edge Portal announce date Nov. 11, 2021 and posted in BC website</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=1a4e2a01194ddf045d542af6f1e997b</p> <p>http://benguetcorp.com/wp-content/uploads/2021/11/Results-of-Nov-10-2021-ASM-and-Org-Mtg-of-BOD.pdf</p> <p>Please refer also to Organizational chart posted in BC website: http://benguetcorp.com/wp-content/uploads/2022/05/BC_TO_2022-05242022180507-0001.pdf</p>	
2	Board is primarily responsible for assessing the performance of Management led by the Chief Executive Officer (CEO) and the heads of the other control functions (Chief Risk Officer, Chief Compliance Officer and Chief Audit Executive).	Compliant	<p>Provide information on or reference to a document containing the Board’s policy and responsibility for assessing the performance of management.</p> <p>Provide information on the assessment process and indicate frequency of assessment of performance.</p> <p>The Board assessed the performance of the management led by the President, and control functions led by the Chief Risk Officer, Chief Compliance Officer, and Chief Audit/Internal Audit Head. Please refer to the Company’s MCG on Art. III 3.10 (d), page 13 on Performance Assessment. http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>Please refer to Board Charter page 12, par. 6(d) on Performance Assessment</p>	

			<p>http://benguetcorp.com/wp-content/uploads/2020/07/P1-Board-Charter.pdf.</p> <p>The President, Chief Compliance Officer and Chief Risk Officer all report directly to the Board. The Chief Audit/Internal Audit Head has full and free access to Senior Management and Audit Committee. Please refer to Internal Audit Charter, page 1 posted in BC website http://benguetcorp.com/wp-content/uploads/2020/06/O.-BC-Internal-Audit-Charter.pdf.</p> <p>Please see Organizational Chart posted in BC website: http://benguetcorp.com/wp-content/uploads/2022/05/BC_TO_2022-05242022180507-0001.pdf</p> <p>Provide information on the assessment process and indicate frequency of assessment of performance.</p> <p>The Board assesses the performance of the President and the heads of the other control functions on an annual basis. Please refer to Performance Evaluation of Officers/Managers – Annex “F”.</p>	
Recommendation 2.9				
1	Board establishes an effective performance management framework that ensures that Management’s performance is at par with the standards set by the Board and Senior Management.	Compliant	<p>Provide information on or link/reference to a document containing the Board’s performance management framework for management and personnel.</p> <p>The Board establishes an effective performance management framework following the Company’s Mission and Vision, strategic objectives, fundamental policies and procedures for the management of the corporation, as well as the system for monitoring and evaluating management’s performance. Please refer to MCG on Art. III, par. 3.10.e, page 13 on Performance Assessment http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf.</p> <p>BC has a performance-based rewards and recognition system which is spearheaded by its Corporate HR Working Team to ensure</p>	
2	Board establishes an effective performance management framework that ensures that personnel’s performance is at par with the standards set	Compliant		

	by the Board and Senior Management.		<p>that the performance of parent and of each subsidiary business unit is consistent with the Company’s commitment to its Board and stakeholders.</p> <p>Please see attached Annex “G” Policy on Performance Appraisal</p> <p>Please refer to Board Charter, p.13 on Performance Assessment. http://benguetcorp.com/wp-content/uploads/2020/07/P1-Board-Charter.pdf</p>	
Recommendation 2.10				
1	Board oversees that an appropriate internal control system is in place.	Compliant	<p>Provide information on or link/reference to a document showing the Board’s responsibility for overseeing that an appropriate internal control system is in place and what is included in the internal control system</p>	
2	The internal control system includes a mechanism for monitoring and managing potential conflict of interest of the Management, members and shareholders.	Compliant	<p>Board has established an Internal Audit Charter. BC’s internal control system includes: (1). Compliance, operations, financial, fraud, IT, and tax audits; (2). Advisory or consultancy services; and (3). Business process review or improvement.</p> <p>Please refer to BC website under Board Committee Charters -> Internal Audit Charter http://benguetcorp.com/wp-content/uploads/2020/06/O.-BC-Internal-Audit-Charter.pdf</p> <p>Please refer to Board Charter, Art. III.A(p) page 9 http://benguetcorp.com/wp-content/uploads/2020/07/P1-Board-Charter.pdf.</p> <p>Please refer to MCG on Art. III, par. 3.8 A(p), page 11 on General Responsibilities of the Board and Art. IV 4.3(c) page 15 on Audit Committee as part of their responsibilities and duties. http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>BC has a Conflict of Interest Policy which covers all employees and is available on the company’s website. http://benguetcorp.com/wp-content/uploads/2019/05/Conflict-of-Interest.pdf</p>	

			<p>Please refer to Board Charter Art IV.4 Conflict of Interest pages 11-12. http://benguetcorp.com/wp-content/uploads/2020/07/P1-Board-Charter.pdf</p>	
3	Board approves the Internal Audit Charter.	Compliant	<p>Provide reference or link to the company's Internal Audit Charter</p> <p>BC Internal Audit Charter was approved by the Board during its regular meeting held on Nov. 5, 2015. Please refer to BC website under Board Committee Charters -> Internal Audit Charter http://benguetcorp.com/wp-content/uploads/2020/06/O.-BC-Internal-Audit-Charter.pdf.</p>	
Recommendation 2.11				
1	Board oversees that the company has in place a sound enterprise risk management (ERM) framework to effectively identify, monitor, assess and manage key business risks.	Compliant	<p>Provide information on or link/reference to a document showing the Board's oversight responsibility on the establishment of a sound enterprise risk management framework and how the board was guided by the framework. Provide proof of effectiveness of risk management strategies, if any.</p> <p>The Board oversees that BC has in place a sound Enterprise Risk Management (ERM) framework. Please refer to ERM Policy posted in BC website. http://benguetcorp.com/wp-content/uploads/2020/07/Enterprise-Risk-Mgnt-Framework.pdf</p>	
2	The risk management framework guides the board in identifying units/business lines and enterprise-level risk exposures, as well as the effectiveness of risk management strategies.	Compliant	<p>BC's ERM framework guides the Board in identifying risk exposures, as well as the effectiveness of risk management strategies. See page 6, no. 5. http://benguetcorp.com/wp-content/uploads/2020/07/Enterprise-Risk-Mgnt-Framework.pdf</p> <p>BC has an established Board Risk Oversight Committee (BROC) Charter approved by the BOD on June 24, 2011, as amended on June 24, 2019. Please refer to pages 2-4 of BROC Charter on the responsibilities and key function of Risk Management Committee. http://benguetcorp.com/wp-content/uploads/2020/06/C.-Board-Risk-Oversight-Comm-Charter.pdf</p>	

			<p>For 2021, BROC had two (2) meetings, one held in March 1, 2021 and the other was on April 27, 2021. The Chief Risk Officer prepared risk assessment report and the Operations head proposed solutions to management for discussion and submission to the BROC. The BROC took the necessary and appropriate actions to address the risks (please see attached Annexes “H” and “H-1” on BROC agenda discussed and taken up).</p> <p>Please refer also to 2021 Annual Report SEC 17-A pages 15-16 of 50 pages on Major Business Risks Items (a) to (f) disclosed in PSE Edge Portal announce date May 16, 2022 and posted in BC website. https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>Please refer also to MCG, page 11, Art III.3.8 A(q). http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>Please refer also to Board Charter page 9 Art. III.A (q). http://benguetcorp.com/wp-content/uploads/2020/07/P1-Board-Charter.pdf</p>	
Recommendation 2.12				
1	Board has a Board Charter that formalizes and clearly states its roles, responsibilities and accountabilities in carrying out its fiduciary role.	Compliant	<p>Provide link to the company’s website where the Board Charter is disclosed.</p> <p>Please refer to Board Charter posted in BC website. http://benguetcorp.com/wp-content/uploads/2020/07/P1-Board-Charter.pdf</p>	
2	Board Charter serves as a guide to the directors in the performance of their functions.	Compliant	The Company’s Board Charter clearly defines its purpose and states the Board’s roles, responsibilities and accountabilities in carrying out its fiduciary duties and serves as a guide to directors in the performance of their functions. The Board Charter supplements the	

3	Board Charter is publicly available and posted on the company's website.	Compliant	<p>Corporation's By-Laws, Manual of Corporate Governance and Code of Ethical Conduct in upholding good Corporate Governance within BC's corporate culture, which begins at the Board level.</p> <p>Please refer to BC Board Charter posted in BC website http://benguetcorp.com/wp-content/uploads/2020/07/P1-Board-Charter.pdf.</p>	
Additional Recommendation to Principle 2				
1	Board has a clear insider trading policy.	Compliant	<p>Provide information on or link/reference to a document showing company's insider trading policy.</p> <p>Please refer to BC website Manual of Corporate Governance ->Policies http://benguetcorp.com/wp-content/uploads/2018/05/P4-Insider-Trading-Policy.pdf.</p>	
Optional Principle 2				
1	Company has a policy on granting loans to directors, either forbidding the practice or ensuring that the transaction is conducted at arm's length basis and at market rates.		<p>Provide information on or link/reference to a document showing company's policy on granting loans to directors, if any.</p>	
2	Company discloses the types of decision requiring board of directors' approval		<p>Indicate the types of decision requiring board of directors' approval and where there are disclosed.</p>	
<p>Principle 3: Board committees should be set up to the extent possible to support the effective performance of the Board's functions, particularly with respect to audit, risk management, related party transactions, and other key corporate governance concerns, such as nomination and remuneration. The composition, functions and responsibilities of all committees established should be contained in a publicly available Committee Charter.</p>				
Recommendation 3.1				
1	Board establishes board committees that focus on specific board functions to aid in the optimal	Compliant	<p>Provide information or link/reference to a document containing information on all the board committees established by the company</p> <p>Board has constituted various board committees to aid in the optimal performance of its duties. Please refer to all the board committees</p>	

	<p>performance of its roles and responsibilities.</p>		<p>established on BC website under Corporate Governance->Board Committees. http://benguetcorp.com/wp-content/uploads/2019/11/Board-Committees-and-Members-1.pdf</p> <p>Please refer also to MCG page 11 (j). http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>Please refer also to MCG pages 14-21 Art. IV – Board Committees http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf.</p> <p>All the constituted Board Committees have their respective Committee Charters stating their respective purposes, memberships, structures, operations, reporting processes, resources and other relevant information, which are disclosed in the Company website.</p> <p>The BC Board constituted Board Committees to assist it in the performance of its duties and responsibilities and in accordance with the By-Laws of the Corporation and to aid in good governance. Please refer to Board Charter page 9 (j) http://benguetcorp.com/wp-content/uploads/2020/07/P1-Board-Charter.pdf.</p>	
<p>Recommendation 3.2</p>				
<p>1</p>	<p>Board establishes an Audit Committee to enhance its oversight capability over the company's financial reporting, internal control system, internal and external audit processes, and compliance with applicable laws and regulations.</p>	<p>Compliant</p>	<p>Provide information or link/reference to a document containing information on the Audit Committee, including its functions. Indicate if it is the Audit Committee's responsibility to recommend the appointment and removal of the company's external auditor.</p> <p>Please refer to AuditComm Charter on page 4, par. 3.d.2 posted in BC website under AuditComm Charter revised 11.5.15, which provides the role of AuditComm to recommend to the Board the appointment, replacement and/or retention of the External Auditor. The External Auditor is directly accountable to the AuditComm. http://benguetcorp.com/wp-content/uploads/2020/07/Audit-Committee-Charter-rev11.5.15.pdf</p>	

			<p>Please refer also to MCG Article IV 4.3 page 15 on Audit Committee functions. http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>Please refer also to MCG General Responsibilities of the Board, page 11 (j) http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf.</p>	
2	<p>Audit Committee is composed of at least three appropriately qualified non-executive directors, the majority of whom, including the Chairman is independent.</p>	Compliant	<p>Provide information or link/reference to a document containing information on the members of the Audit Committee, including their qualifications and type of directorship.</p> <p>The following are members of BC AuditCom, all of whom are Non-Executive Directors: Atty. Rhodora L. Dapula – Chairman Dr. Bernardo M. Villegas – Member Mr. Andrew Patrick R. Casiño – Member</p> <p>Please refer to BC website on composition of AuditCom under tab Corp Governance -> Board Committees http://benguetcorp.com/wp-content/uploads/2022/05/Dec-31-2021-Directors-and-Officers.pdf</p> <p>Please refer also to BC website on disclosure on Results of Organizational Meeting of the Board of Directors on Nov. 10, 2021 and disclosed in PSE Edge Portal announce date Nov 11, 2021. https://edge.pse.com.ph/openDiscViewer.do?edge_no=1a4e2a01194ddf045d542af6f1e997b http://benguetcorp.com/wp-content/uploads/2021/11/Results-of-Nov-10-2021-ASM-and-Org-Mtg-of-BOD.pdf</p> <p>Please refer to their qualifications indicated in SEC 17-A 2021 Annual Report SEC Form 17-A on pages 33-35 of 50 pages and 2021 DIS SEC</p>	

			<p>20-IS pages 11-14 under Company Disclosures in PSE Edge Portal announce date May 16, 2022 and in BC website. https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9</p>	
3	<p>All the members of the committee have relevant background, knowledge, skills, and/or experience in the areas of accounting, auditing and finance.</p>	Compliant	<p>Provide information or link/reference to a document containing information on the background, knowledge, skills, and/or experience of the members of the Audit Committee.</p> <p>All the members of BC’s Audit Committee have the background, knowledge, skills, and/or experience in the areas of accounting, auditing and finance.</p> <p>Please refer to the members of the AuditComm background and experience indicated in the 2021 Annual Report SEC Form 17-A on pages 33-35 announce date May 16, 2022 and 2021 DIS SEC 20-IS pages 11-14 announce date Oct 13, 2021 disclosed in PSE Edge Portal and posted in BC website. https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf</p>	

			https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9	
4	The Chairman of the Audit Committee is not the Chairman of the Board or of any other committee.	Compliant	<p>Provide information or link/reference to a document containing information on the Chairman of the Audit Committee</p> <p>Atty. Rhodora L. Dapula, Chairman of the AuditCom is not the Chairman of the Board or of any other committee. Her profound competence as CPA-Lawyer has proven invaluable in the Audit Committee she chaired. Information on Atty. Dapula is indicated in 2021 Annual Report SEC Form 17-A on page 34 and 2021 DIS SEC 20-Info Statement page 12 disclosed in PSE Edge Portal and posted in BC website.</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9</p>	
Supplement to Recommendation 3.2				
1	Audit Committee approves all non-audit services conducted by the external auditor.	Compliant	<p>Provide proof that the Audit Committee approved all non-audit services conducted by the external auditor.</p> <p>Please refer to MCG Art. IV 4.3(c) IV (e) page 18 on Overseeing External Audit</p> <p>http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>Please refer also to AuditComm Charter IV, no. 5, page 5.</p>	

			http://benguetcorp.com/wp-content/uploads/2020/07/Audit-Committee-Charter-rev11.5.15.pdf There are no non-audit services rendered by the external auditor in 2021 other than the usual audit services. Please refer to 2021 Annual Report SEC Form 17-A Item 8 page and 2021 DIS SEC 20-IS Item 7 page 21 disclosed in PSE Edge Portal announce date May 16, 2022 and posted in BC website. https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf Please see attached Report of the AuditCom to the Board of Directors (Annex "I").	
2	Audit Committee conducts regular meetings and dialogues with the external audit team without anyone from management present.	Compliant	Provide proof that the Audit Committee conducted regular meetings and dialogues with the external audit team without anyone from management present. The Auditcom openly communicates and conducts meetings and dialogues with the External Auditors on key audit matters without anyone from management present. Please refer to the Report of the AuditCom to the BOD (Annex "I").	
Optional Recommendation 3.2				
1	Audit Committee meet at least four times during the year.		Indicate the number of Audit Committee meetings during the year and provide proof	
2	Audit Committee approves the appointment and removal of the internal auditor.	Compliant	Please refer to AUDITCOMM Charter page 4 c.1 Overseeing internal audit which states "Recommend and give direction to the Internal Audit Office on matters that will further upgrade its performance and recommend to the Board the terms for the appointment, removal and replacement of the Internal Audit Head, who shall have reporting responsibility to the Committee." http://benguetcorp.com/wp-content/uploads/2020/07/Audit-Committee-Charter-rev11.5.15.pdf	

Recommendation 3.3			
1	Board establishes a Corporate Governance Committee tasked to assist the Board in the performance of its corporate governance responsibilities, including the functions that were formerly assigned to a Nomination and Remuneration Committee.	Compliant	<p>Provide information or reference to a document containing information on the Corporate Governance Committee, including its functions Indicate if the Committee undertook the process of identifying the quality of directors aligned with the company's strategic direction, if applicable.</p> <p>BC has an established Corporate Governance Committee, all of whom are independent directors composed of: Dr. Bernardo M. Villegas as Chairman and Mr. Reginald S. Velasco and Atty. Rhodora L. Dapula as members with Mr. Max D. Arceño as Compliance Officer. Please see BC website -> Corporate Governance ->Board Committees http://benguetcorp.com/wp-content/uploads/2022/05/Dec-31-2021-Directors-and-Officers.pdf</p> <p>Pls see also BC website on Company Disclosures Results of 2021 Organizational meeting of BOD pages 4-5 posted in BC website and disclosed in PSE Edge Portal announce date Nov. 11, 2021</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=1a4e2a01194ddf045d542af6f1e997b</p> <p>http://benguetcorp.com/wp-content/uploads/2021/11/Results-of-Nov-10-2021-ASM-and-Org-Mtg-of-BOD.pdf</p> <p>Please see MCG pages 19-20 on functions of CG Committee http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf which includes overseeing the periodic performance evaluation of the Board and its committees as well as executive management.</p>
2	Corporate Governance Committee is composed of at least three members, all of whom should be independent directors.	Compliant	<p>Provide information or link/reference to a document containing information on the members of the Corporate Governance Committee, including their qualifications and type of directorship.</p> <p>BC Corporate Governance Committee is composed of 3 members, all of whom are Independent Directors, namely: (1) Dr. Bernardo M.</p>

			<p>Villegas, Chairman (2) Mr. Reginald S. Velasco, member and (3) Ms. Rhodora L. Dapula, member. Information on members of the Corp Governance Committee is indicated in 2021 Annual Report SEC Form 17-A on pages 34-35 of 50 pages disclosed in PSE Edge Portal announce date May 16, 2022 and posted in BC website https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>and 2021 DIS SEC 20-IS pages 11-14 in PSE Edge Portal Company Disclosures announce date Oct. 13, 2021 and in BC website.</p> <p>http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9</p> <p>Please see BC website -> Corporate Governance ->Board Committees http://benguetcorp.com/wp-content/uploads/2022/05/Dec-31-2021-Directors-and-Officers.pdf</p> <p>Also please see BC website on Company Disclosures under tab Minutes of All General or Special Stockholders Meetings , page 5 of Results of Nov. 10, 2021 Organizational meeting of BOD, and in PSE Edge Portal under Company Disclosures announce date Nov. 11, 2021.</p> <p>http://benguetcorp.com/wp-content/uploads/2021/11/Results-of-Nov-10-2021-ASM-and-Org-Mtg-of-BOD.pdf</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=1a4e2a01194ddf045d542af6f1e997b</p>	
3	Chairman of the Corporate Governance Committee is an independent director.	Compliant	Provide information or link/reference to a document containing information on the Chairman of the Corporate Governance Committee.	

			<p>Dr. Bernardo Villegas, Chairman of the Corp Governance Committee is an Independent Director. Please refer to SEC 17-A BC 2021 Annual Report announce date May 16, 2022 in PSE Edge Portal and In BC website on page 35 and Information Statement page 13 announce date Oct 13, 2021 in PSE Edge Portal</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9</p> <p>http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf</p>	
Optional: Recommendation 3.3				
1	Corporate Governance Committee meet at least twice during the year.			
Recommendation 3.4				
1	Board establishes a separate Board Risk Oversight Committee (BROC) that should be responsible for the oversight of a company's Enterprise Risk Management system to ensure its functionality and effectiveness.	Compliant	<p>Provide information or link/reference to a document containing information on the Board Risk Oversight Committee (BROC), including its functions</p> <p>BC has an established Board Risk Oversight Committee (BROC) Charter. Please see composition of Board Risk Oversight Committee (BROC)</p> <p>http://benguetcorp.com/wp-content/uploads/2019/04/BOARD-COMMITTEES.pdf.</p> <p>Please refer to BROC Charter pages 2-3 on key functions of the Committee</p> <p>http://benguetcorp.com/wp-content/uploads/2020/06/C.-Board-Risk-Oversight-Comm-Charter.pdf.</p>	

			<p>Please refer also to pages 18-19 of the Manual of Corp Governance on functions of BROCC posted in BC website http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf.</p>	
2	<p>BROCC is composed of at least three members, the majority of whom should be independent directors, including the Chairman.</p>	Compliant	<p>Provide information or link/reference to a document containing information on the members of the BROCC, including their qualifications and type of directorship</p> <p>BROCC is composed of 3 members of which 2 members are independent directors. Mr. Reginald S. V elasco, BROCC Chairman, is an independent director. Also BROCC member, Dr. Bernardo M. Villegas is an Independent Director. Third member is Atty. Jose Raulito E. Paras, regular director. All BROCC members are Non-Executive Directors. Pls refer to pages 33-35 of 50 pages of 2021 Annual Report SEC Form 17-A disclosed in PSE Edge Portal announce date May 16, 2022 and posted in BC website on BROCC members' qualifications and type of directorship (please see Annex "A").</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>The qualifications of each of the members of the Board, including members of BROCC, are contained in the Information Statement for 2021 pp. 11-14 of 228 pages of SEC 20-IS Part 1 disclosed in PSE Edge Portal announce date Oct. 13, 2021 and posted in BC website.</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9</p> <p>http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf</p>	

3	The Chairman of the BROC is not the Chairman of the Board or of any other committee.	Compliant	<p>Provide information or link/reference to a document containing information on the Chairman of the BROC</p> <p>BROC Chairman Mr. Reginald S. Velasco is not the Chairman of the Board or of any other committees. Please see composition of all board committees posted in BC website. http://benguetcorp.com/wp-content/uploads/2022/05/Dec-31-2021-Directors-and-Officers.pdf</p> <p>Please refer to Results of 2021 Organizational meeting of BOD page 5 posted in BC website and disclosed in PSE Edge Portal announce date Nov. 11, 2021. https://edge.pse.com.ph/openDiscViewer.do?edge_no=1a4e2a01194ddf045d542af6f1e997b</p> <p>http://benguetcorp.com/wp-content/uploads/2021/11/Results-of-Nov-10-2021-ASM-and-Org-Mtg-of-BOD.pdf</p> <p>Information about the BROC Chairman, Mr. Reginald S. Velasco is available on pages 34-35 of 50 pages of 2021 Annual Report disclosed in PSE Edge Portal announce date May 16, 2022 and posted in BC website. https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>Can also be found on page 12 of 2021 DIS SEC Form 20-IS disclosed in PSE Edge Portal announce date Oct. 13, 2021 and posted in BC website https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9</p> <p>http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf</p>	
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4	At least one member of the BROC has relevant thorough knowledge and experience on risk and risk management.	Compliant	<p>Provide information or link/reference to a document containing information on the background, skills, and/or experience of the members of the BROC.</p> <p>Atty. Jose Raulito E. Paras, member of BROC has knowledge and experience in risk management particularly involving environmental laws. He was a general counsel of a mining firm, Lepanto Consolidated Mining Co. Please refer to his background and experience as indicated in SEC 17-A 2021 BC Annual Report on page 33 of 50 pages and 2021 Information Statement announce date Oct. 13, 2021 page 11 available in PSE Edge Portal under Company Disclosures and posted in BC website</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf</p> <p>Information Statement:</p> <p>http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9</p> <p>Please refer to information on BROC Chair Mr. Reginald Velasco and BROC member Dr. Bernardo Villegas on SEC 17-A 2021 Annual Report 34-35 of 50 pages and 2021 DIS SEC 20-IS pages 12-13 of 228 pages disclosed in PSE Edge Portal and posted in BC website.</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf</p>	
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Recommendation 3.5				
1	Board establishes a Related Party Transactions (RPT) Committee, which is tasked with reviewing all material related party transactions of the company.	Compliant	<p>Provide information or link/reference to a document containing information on the Related Party Transactions (RPT) Committee, including its functions.</p> <p>Please refer to RPT Committee created by the BOD available in BC website under Corporate Governance ->board committees http://benguetcorp.com/wp-content/uploads/2022/05/Dec-31-2021-Directors-and-Officers.pdf</p> <p>Also contained in Company Disclosures in PSE Edge Portal announce date Nov. 11, 2021 and in BC website under tab Minutes of All General or Special ASM Meeting Results of Nov. 10, 2021 Organizational meeting of BOD page 5 posted in BC website https://edge.pse.com.ph/openDiscViewer.do?edge_no=1a4e2a01194ddf045d542af6f1e997b9</p> <p>http://benguetcorp.com/wp-content/uploads/2021/11/Results-of-Nov-10-2021-ASM-and-Org-Mtg-of-BOD.pdf</p> <p>Also refer to MCG page 20-21 on functions of RPT Committee. http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>Please refer to RPT Charter pages 2-3 on roles and responsibilities of the RPT Committee. http://benguetcorp.com/wp-content/uploads/2020/07/P3-RPT-Charter.pdf</p>	
2	RPT Committee is composed of at least three non-executive directors, two of	Compliant	<p>Provide information or link/reference to a document containing information on the members of the RPT Committee, including their qualifications and type of directorship.</p>	

<p>whom should be independent, including the Chairman.</p>	<p>RPT is composed of 4 non-executive directors and one executive director, 2 of whom are independent directors, including the Chairman. The members of the RPT Committee are: Bernardo M. Villegas (ID) as Chairman, Reginald S. Velasco (ID), Jose Raulito E. Paras, Luis Juan L. Virata and Lina Fernandez as members.</p> <p>Please refer to RPT Committee created by the BOD available in PSE Edge Portal under Company disclosures results of Nov. 10, 2021 Organizational meeting of the Board announce date Nov. 11, 2021 and in BC website under Company Disclosures tab Minutes of General or Special Meeting, ASM Results of 2021 Organizational meeting of BOD page 5 and in Board Committees under Corporate Governance posted in BC website.</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=1a4e2a01194ddf045d542af6f1e997b</p> <p>http://benguetcorp.com/wp-content/uploads/2021/11/Results-of-Nov-10-2021-ASM-and-Org-Mtg-of-BOD.pdf</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/Dec-31-2021-Directors-and-Officers.pdf</p> <p>For type of directorship, please see attached Annex “A.”</p> <p>For their qualifications, please refer to 2021 Annual Report pp 33-35 disclosed in PSE Edge Portal announce date May 16, 2022 and posted in BC website; and 2021 DIS pages 11-14 in PSE Edge Portal announce date Oct. 13, 2021 and posted in BC website.</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9</p>	
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			http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf	
Recommendation 3.6				
1	All established committees have a Committee Charter stating in plain terms their respective purposes, memberships, structures, operations, reporting process, resources and other relevant information.	Compliant	<p>Provide information on or link/reference to the company's committee charters, containing all the required information, particularly the functions of the Committee that is necessary for performance evaluation purposes.</p> <p>The Board formed committees on Executive, Salary and Stock Option, Audit, Nominations and Election, Corporate Governance, Board Risk Oversight Committee (BROC) and Related Party Transactions (RPT) have their respective committee charters. The charters of the different committees can be accessed at the BC website under Corporate Governance.</p> <p>http://benguetcorp.com/corporate-governance/board-committees/</p> <p>BROC Charter – please refer to page 4, par. 4 procedure No. 4 which states that the committee shall provide and submit a year-end summary report to the Board of its activities during the year, confirmation of how the responsibilities were discharged during the year, result of the assessment performed on the effectiveness of the committee and the contributions for improvement.</p> <p>http://benguetcorp.com/wp-content/uploads/2020/06/C.-Board-Risk-Oversight-Comm-Charter.pdf</p> <p>See also BROC Risk Self-Assessment (Annex “M-2”).</p> <p>Audit Comm Charter – please refer to page 2, Art. IV (1) (c). To ensure that the Committee continues to fulfill its responsibilities in accordance with global best practices and in compliance with the Revised Code of Corporate Governance and other relevant regulatory standards, the Committee shall assess its performance annually. The result of the assessment shall be validated by the Company's Compliance Officer and the entire assessment process documented and to form part of the corporate record. A feedback mechanism shall be in place to receive comments from Management and external auditor. Based on the results of the assessment, the</p>	
2	Committee Charters provide standards for evaluating the performance of the Committees.	Compliant		

			<p>Committee shall formulate and implement plans to improve its performance. These shall include the identification of relevant training needs intended to keep the members up-to-date with corporate governance best practices, accounting and auditing standards, as well as specific areas of concern.</p> <p>http://benguetcorp.com/wp-content/uploads/2020/07/Audit-Committee-Charter-rev11.5.15.pdf</p> <p>Please refer also to Auditcom Self-Assessment summary (Annex “M-1”).</p> <p>RPT Charter – please refer to Art. E, page 4 provides the standards for evaluating the performance and effectiveness of the Committee in fulfilling its duties and responsibilities as set out in the Charter and in the Company’s Manual on Corporate Governance. The Committee shall conduct a self-assessment of its performance, at least once a year.</p> <p>http://benguetcorp.com/wp-content/uploads/2020/07/P3-RPT-Charter.pdf</p> <p>Compensation Charter – please refer to page 3 par. 3 (I) which provides that self-evaluation of the Committee’s performance including its effectiveness and compliance is conducted annually.</p> <p>http://benguetcorp.com/wp-content/uploads/2020/07/P6-COMPENSATION-CHARTER.pdf</p>	
3	<p>Committee Charters were fully disclosed on the company’s website.</p>	Compliant	<p>Provide link to company’s website where the Committee Charters are disclosed.</p> <p>The charters of the committees were fully disclosed on the company’s website.</p> <p>Please refer to BC website on Committee Charters</p> <p>http://benguetcorp.com/corporate-governance/board-committees/</p> <p>Board Risk Oversight Committee (BROC) Charter:</p> <p>http://benguetcorp.com/wp-content/uploads/2020/06/C.-Board-Risk-Oversight-Comm-Charter.pdf</p>	

			<p>Nominations and Election Committee Charter: http://benguetcorp.com/wp-content/uploads/2020/07/Nominations-and-Election-Comm-Charter.pdf</p> <p>Board Charter: http://benguetcorp.com/wp-content/uploads/2020/07/P1-Board-Charter.pdf</p> <p>Audit Committee Charter: http://benguetcorp.com/wp-content/uploads/2020/07/Audit-Committee-Charter-rev11.5.15.pdf</p> <p>Compensation Committee Charter: http://benguetcorp.com/wp-content/uploads/2020/07/P6-COMPENSATION-CHARTER.pdf</p> <p>Related Party Transaction (RPT) Committee Charter: http://benguetcorp.com/wp-content/uploads/2020/07/P3-RPT-Charter.pdf</p>	
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Principle 4: To show full commitment to the company, the directors should devote the time and attention necessary to properly and effectively perform their duties and responsibilities, including sufficient time to be familiar with the corporation’s business.

Recommendation 4.1

1	The Directors attend and actively participate in all meetings of the Board, Committees and shareholders in person or through tele-/videoconferencing conducted in accordance with the rules and regulations of the Commission.	Compliant	<p>Provide information or link/reference to a document containing information on the process and procedure for tele/videoconferencing board and/or committee meetings.</p> <p>Board of Directors attend and actively participate in all meetings, in person or through tele/videoconferencing conducted in accordance with the rules and regulations of SEC. Please see attached Annex “J” Secretary Certificate on director’s participation in meetings.</p> <p>Provide information or link/reference to a document containing information on the attendance and participation of directors to Board, Committee and shareholders’ meetings.</p>	
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		<p>Please also refer to PSE Edge Portal under Company Disclosures- Other SEC Forms, Reports and Requirements, announce date 19 Jan 2022, and to BC website on board attendance to BOD meetings.</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=827e5f93b516a3253470cea4b051ca8f</p> <p>http://benguetcorp.com/wp-content/uploads/2022/01/SEC-Form-17-C_Advisement-on-Attendance-of-Directors-to-Board-Meetings-2021.pdf</p> <p>Pls refer also to page 1 of Annual Stockholders Minutes of Meeting held on Nov 10, 2021 on directors attendance when they were introduced during the virtual meeting posted in BC website</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/Minutes-of-10-November-2021-ASM.pdf</p> <p>For attendance of directors attending through tele/video conferencing, BC complies with SEC rules as indicated in the Minutes of the BOD meetings.</p> <p>If and when necessary, particularly during 2021 pandemic, the Board holds committee meetings through the use of telecommunications or other electronic media.</p> <p>Please refer also to MCG, 3.7 (a) on Board Meetings and Quorum Requirements.</p> <p>http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>Please refer also to Board Charter page 7, Art. II, on Board Meetings, Quorum Requirements, and Attendance, and to page 10 Art. III, B(b) iv on Specific Responsibilities of each director.</p> <p>http://benguetcorp.com/wp-content/uploads/2020/07/P1-Board-Charter.pdf</p>	
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2	The directors review meeting materials for all board and Committee meetings.	Compliant	<p>Materials for discussion are sent in advance through email or personal delivery (as requested) to directors at least one (1) day before the scheduled board or committee meeting to provide ample time for the study and review of materials for discussion. Hard copies of materials are distributed to directors during the actual Board meeting.</p> <p>Please see attached Annex “K,” emails sent to directors.</p> <p>Please refer also to MCG, page 12, B (b) i & iii http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf.</p> <p>Please refer to Board Charter page 10, B(b) I & iii http://benguetcorp.com/wp-content/uploads/2020/07/P1-Board-Charter.pdf.</p>	
3	The directors ask the necessary questions or seek clarifications and explanations during the Board and Committee meetings.	Compliant	<p>Provide information or link/reference to a document containing information on any questions raised or clarification/explanation sought by the directors</p> <p>Please see attached Annex “J” Secretary Certificate on active participation of directors where clarifications/questions on certain issues discussed were raised during the Board meeting.</p>	
Recommendation 4.2				
1	Non-executive directors concurrently serve in a maximum of five publicly-listed companies to ensure that they have sufficient time to fully prepare for minutes, challenge Management’s proposals/views, and oversee the long-term strategy of the company.	Compliant	<p>Disclose if the company has a policy setting the limit of board seats that a non-executive director can hold simultaneously. Provide information or reference to a document containing information on the directorships of the company’s directors in both listed and non-listed companies</p> <p>Please refer to 2021 Annual Report SEC 17-A Item 9 page 32 disclosed in PSE Edge Portal and posted in BC website. https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p>	

			<p>Please refer also to MCG, page 12, B (c) which states, “The non-executive directors of the Board should concurrently serve as directors to a maximum of five publicly listed companies to ensure that they have sufficient time to fully prepare for meetings, challenge Management’s proposals/views, and oversee the long-term strategy of the Company.”</p> <p>http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>Please refer to Board Charter page 10, B(c). http://benguetcorp.com/wp-content/uploads/2020/07/P1-Board-Charter.pdf</p> <p>Five (5) non-executive directors of the Company, Messrs. Kwok Yam Ian Chan, Luis Juan Virata, Jose Raulito E. Paras, Bernardo M. Villegas and Anthony M. Te are concurrently serving as directors to less than five (5) publicly-listed companies. All other non-executive directors are not serving in any other PLCs.</p> <p>Please refer to 2021 Annual Report, announced May 16, 2021, item 9 pages 33-36 disclosed in PSE Edge Portal and posted in BC website. https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p>	
Recommendation 4.3				
1	The directors notify the company’s board before accepting a directorship in another company	Compliant	<p>Provide copy of written notification to the board or minutes of board meeting wherein the matter was discussed.</p> <p>Present directors have notified the company of their directorship in other PLC through the regular updating of their profile which is used as reference in the Company’s Annual Report and Information Statement.</p>	

			<p>Please see attached email of directors on update of their respective profile indicating their directorship in other PLCs (Annex "L").</p> <p>Please refer also to MCG, page 4, 3.3(c) (Policy on Multiple Board Seats). http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>Please refer to Board Charter page 11, 2.c. (Policy on Multiple Board Seats) http://benguetcorp.com/wp-content/uploads/2020/07/P1-Board-Charter.pdf</p>	
Optional Principle 4				
1	Company does not have any executive directors who serve in more than two boards of listed companies outside of the group.			
2	Company schedules board of directors' meetings before the start of the financial year.			
3	Board of directors meet at least six times during the year.		Indicate the number of board meetings during the year and provide proof	
4	Company requires as minimum quorum of at least 2/3 for board decisions.		Indicate the required minimum quorum for board decisions	
Principle 5: The board should endeavor to exercise an objective and independent judgment on all corporate affairs.				
Recommendation 5.1				
1	The Board has at least 3 independent directors or such number as to constitute one-third of the board, whichever is higher.	Compliant.	<p>Provide information or link/reference to a document containing information on the number of independent directors in the board</p> <p>From Jan. 2021 to date, the Board has 3 independent directors, namely: Dr. Bernardo M. Villegas, Mr. Reginald S. Velasco and Atty. Rhodora L. Dapula. Please see BC website -> Home-> About us -> Directors and Officers and under tab Corp Governance us -> Board</p>	

			<p>committees and members. Also in Annual Report SEC 17-A Item 9, par. A page 32 disclosed in PSE Edge Portal announce date May 16, 2022 and posted in BC website http://benguetcorp.com/wp-content/uploads/2022/05/Dec-31-2021-Directors-and-Officers.pdf</p> <p>Corporate Governance – Board committees and members http://benguetcorp.com/wp-content/uploads/2022/05/Dec-31-2021-Directors-and-Officers-1.pdf</p> <p>Annual Report Item 9 par A page 32 https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>Please refer also to MCG, Article III 3.1.a page 3, Board Composition. http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>Also to Board Charter Art. 1.a Composition of the Board, page 1. http://benguetcorp.com/wp-content/uploads/2020/07/P1-Board-Charter.pdf</p>	
Recommendation 5.2				
1	The independent directors possess all the qualifications and none of the disqualifications to hold the positions.	Compliant.	<p>Provide information or link/reference to a document containing information on the qualifications of the independent directors.</p> <p>The Board’s independent directors, Directors Bernardo Villegas, Reginald Velasco and Rhodora Dapula possess all the qualifications and none of the disqualifications to hold their positions. Please refer to 2021 Annual Report SEC Form 17-A pages 34-35 in PSE Edge Portal under Company disclosures, 2021 Annual Report announce date May 16, 2022; also posted in BC website.</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p>	

			<p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>Also found in Information Statement pp 11-14, in BC website and in PSE Edge Portal announce date Oct. 13, 2021</p> <p>http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9</p> <p>Please refer to Art. III.6 pages 7-9 of Manual of Corporate Governance on the qualifications of independent directors.</p> <p>http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>Also refer to Board Charter page 5 on qualifications of Independent Directors.</p> <p>http://benguetcorp.com/wp-content/uploads/2020/07/P1-Board-Charter.pdf</p>	
Supplement to Recommendation 5.2				
1	Company has no shareholder agreements, by-laws provisions, or other arrangements that constrain the directors' ability to vote independently.	Compliant.	<p>Provide link/reference to a document containing information that directors are not constrained to vote independently.</p> <p>Please refer to BC website on Amended By-Laws Article 2 pages 10 - 11.</p> <p>http://benguetcorp.com/wp-content/uploads/2020/01/Jan-2020-Amended-Bylaws.pdf</p> <p>The Company has no shareholder agreement, By-laws provision, or other arrangement that constrains the directors' ability to vote independently.</p>	

			<p>Per BC MCG and Board Charter, directors are encouraged to exercise an objective and independent judgment on all corporate matters. Please refer to Board Charter, page 10, par. B.vi. http://benguetcorp.com/wp-content/uploads/2020/07/P1-Board-Charter.pdf</p> <p>Also in MCG, page 12 B.b.vi. http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p>	
Recommendation 5.3				
1	The independent directors serve for a cumulative term of nine years (reckoned from 2012).	Compliant	<p>Provide information or link/reference to a document showing the years IDs have served as such.</p> <p>The Company’s Independent Director Mr. Bernardo Villegas has served for 9 years reckoned from 2012 while the 2 Independent Directors Mr. Reginald Velasco and Atty. Rhodora Dapula have each served 3-1/2 years as both were appointed as Independent Directors last August 16, 2018. Please refer to pages 12-13 of SEC Form 20-IS posted in BC website and in PSE Edge Portal under Company Disclosures Information Statement announce Oct. 13, 2021.</p> <p>http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9</p> <p>Also in 2021 Annual Report SEC 17-A pp 34-35 of 50 pages disclosed in PSE Edge Portal and posted in BC website</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p>	

			<p>Board Charter page 6 on tenure of office states that the Board's independent directors shall serve for a maximum cumulative term of 9 years. After which, the independent director shall be perpetually barred from re-election as such in the same company, but may continue to qualify for nomination and election as non-independent director.</p> <p>http://benguetcorp.com/wp-content/uploads/2020/07/P1-Board-Charter.pdf</p> <p>Please refer also to MCG page 9, 3.6.d.</p> <p>http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p>	
2	The company bars an independent director from serving in such capacity after the term limit of nine years.	Compliant.	<p>Provide information or link/reference to a document containing information on the company's policy on term limits for its independent director</p> <p>Please refer to 2017 MCG Article III Item 3.6.d page 9 posted in BC website.</p> <p>http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>Please refer to Board Charter page 6.</p> <p>http://benguetcorp.com/wp-content/uploads/2020/07/P1-Board-Charter.pdf</p>	
3	In the instance that the company retains an independent director in the same capacity after nine years, the board provides meritorious justification and seeks shareholders' approval during the annual shareholders' meeting.	Compliant	<p>Provide reference to the meritorious justification and proof of shareholders' approval during the annual shareholders' meeting.</p> <p>The Company's MCG (Article III Item 3.6.d page 9) only allows for independent directors to serve a maximum term of 9 years. In the event that an independent director shall be retained beyond this, the Board will have to provide meritorious justification and seek shareholders' approval during the ASM.</p> <p>http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p>	

			<p>The Company's Independent Director Mr. Bernardo Villegas has served for 9 years reckoned from 2012. BC submitted and sought for shareholders' approval of his retention as Independent Director during the annual stockholders' meeting held on Nov 10, 2021 to which the shareholders approved after providing meritorious justification based on BC's experience with him. Pls refer to page 6 of Minutes of Annual Stockholders' Meeting held on Nov 10, 2021 posted in BC website</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/Minutes-of-10-November-2021-ASM.pdf</p> <p>Also disclosed in PSE Edge Portal announce date Nov 11 2021 Results of Annual or Special Stockholders' Meeting page 6 of 9 par #4 https://edge.pse.com.ph/openDiscViewer.do?edge_no=5a8db06b885a71795d542af6f1e997b9</p> <p>also posted in BC website http://benguetcorp.com/wp-content/uploads/2021/11/Results-of-Nov-10-2021-ASM-and-Org-Mtg-of-BOD.pdf</p> <p>Please refer also to Board Charter page 6. http://benguetcorp.com/wp-content/uploads/2020/07/P1-Board-Charter.pdf</p>	
Recommendation 5.4				
1	The positions of Chairman of the Board and Chief Executive Officer are held by separate individuals.	Compliant	<p>Identify the company's Chairman of the Board and Chief Executive Officer</p> <p>The Company's Chairman of the Board is Mr. Bernardo M. Villegas. The Company has no CEO. Atty. Lina Fernandez was appointed as President effective March 18, 2021.</p> <p>Please refer to Home → About us → Directors and Officers posted in BC website.</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/Dec-31-2021-Directors-and-Officers.pdf</p>	

			<p>Also disclosed in PSE Edge Portal announce date Nov 11 2021 Results of Organizational Meeting of Board of Directors page 8 of 9 pp https://edge.pse.com.ph/openDiscViewer.do?edge_no=1a4e2a01194ddf045d542af6f1e997b9</p> <p>and posted in BC website http://benguetcorp.com/wp-content/uploads/2021/11/Results-of-Nov-10-2021-ASM-and-Org-Mtg-of-BOD.pdf</p> <p>Please see also BC Organizational Chart posted in BC website. http://benguetcorp.com/wp-content/uploads/2022/05/BC_TO_2022-05242022180507-0001.pdf</p> <p>Also found in 2021 Annual Report pages 34-35 disclosed in PSE Edge Portal and posted in BC website https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>Please refer to MCG page 21 Art. V 5.1. The Board must be headed by a competent and qualified chairperson. The position of Chairman of the Board and Chief Executive Officer (CEO) must be held by separate individuals. http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p>	
2	The Chairman of the Board and Chief Executive Officer have clearly defined responsibilities.	Compliant	<p>Provide information or link/reference to a document containing information on the roles and responsibilities of the Chairman of the Board and Chief Executive Officer. Identify the relationship of Chairman and CEO.</p> <p>The Chairman of the Board and CEO have clearly defined responsibilities. Please refer to Art. V, 5.1 pages 21-22 of Manual of Corporate Governance on the roles and responsibilities of Chairman of the Board and the roles and responsibilities of the Chief Executive</p>	

			<p>Officer. The Chairman of the Board and the OICs (in lieu of President/CEO) are not related by consanguinity or affinity. http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>Pls refer to BC corporate organizational structure posted in BC website http://benguetcorp.com/wp-content/uploads/2022/05/BC_TO_2022-05242022180507-0001.pdf</p>	
Recommendation 5.5				
1	<p>If the Chairman of the Board is not an independent director, the board designates a lead director among the independent directors.</p>	Compliant	<p>Provide information or link/reference to a document containing information on a lead independent director and his roles and responsibilities, if any. Indicate if Chairman is independent.</p> <p>Please refer to MCG Art. III Item 3.6.c page 8 which provides that the Board should designate a lead director among the independent directors if the Chairman of the Board is not independent, including if the positions of the Chairman of the Board and Chief Executive Officer are held by one person. http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>The Chairman, Mr. Bernardo M. Villegas, is an independent director. He is a Non-Executive Director.</p> <p>Please refer to results of organizational BOD meeting held on Nov. 10, 2021 under Company disclosures in PSE Edge Portal announce date Nov. 11, 2021 and as posted in BC website.</p> <p>BC WEBSITE – http://benguetcorp.com/wp-content/uploads/2020/11/SEC-17C-Results-of-Organizational-Meeting-of-the-Board-of-Directors.pdf</p>	

			<p>Also in GIS page 4 disclosed in PSE Edge Portal announce date Nov 26 2021 (Other SEC Forms Reports and Requirements) and posted in BC website</p> <p>http://benguetcorp.com/wp-content/uploads/2022/04/BC-2021-GIS_notarized.pdf</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=db0912e85e05d0275d542af6f1e997b9</p>	
Recommendation 5.6				
1	Directors with material interest in a transaction affecting the corporation abstain from taking part in the deliberations on the transaction.	Compliant	<p>Provide proof of abstention, if this was the case</p> <p>There have been no cases where directors have material interest in a transaction affecting the company and Directors and key management personnel are required to abstain and/or inhibit themselves from participating in discussions on a particular agenda item where there is conflict of interest.</p> <p>Please refer to MCG Art III Item 3.7c page 9. http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>The Company also has a governance policy on conflict of interest to ensure that the personal interest of officers should never prevail over the interest of the company. BC requires disclosure of companies or parties doing business with the Company where they are owners or officers, or whose principal owners or officers are their relatives and whose work affects decisions or involves recommendations affecting the Company. http://benguetcorp.com/wp-content/uploads/2019/05/Conflict-of-Interest.pdf</p>	
Recommendation 5.7				
1	The non-executive directors (NEDs) have separate periodic meetings with the external auditor and head of	Compliant	<p>Provide proof and details of said meeting, if any. Provide information on the frequency and attendees of meetings.</p>	

	<p>the internal audit, compliance and risk functions, without any executive present.</p> <p>2 The meetings are chaired by the lead independent director.</p>	Compliant	<p>The Audit Committee met with the Internal Audit Head without any executive present on November 8, 2021 Audit Committee Meeting wherein the Internal Audit Head presented their 2021 Accomplishments and 2022 Internal Audit Plan. All members of the Audit Committee were present. Pls refer to Annex “S” – Internal Audit’s Accomplishments in 2021.</p> <p>The Company’s Board Charter Art. II Item 7 page 8 states that, “The non-executive directors (NEDs) should have separate periodic meetings with the external auditor and heads of the internal audit, compliance and risk functions, without any executive directors present to ensure that proper checks and balances are in place within the corporation. The meetings should be chaired by the lead independent director.”</p> <p>http://benguetcorp.com/wp-content/uploads/2020/07/P1-Board-Charter.pdf</p> <p>Please refer also to MCG Page 9, 3.7 item d.</p> <p>http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p>	
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Optional Principle 5

1	None of the directors is a former CEO of the company in the past 2 years.		Provide name/s of company CEO for the past 2 years	
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Principle 6: The best measure of the Board’s effectiveness is through an assessment process. The Board should regularly carry out evaluations to appraise its performance as a body, and assess whether it possesses the right mix of backgrounds and competencies.

Recommendation 6.1

1	Board conducts an annual self-assessment of its performance as a whole.	Compliant	<p>Provide proof of self-assessments conducted for the whole board, the individual members, the Chairman and the Committees</p> <p>This is provided in Art. III, 3.10 (a) and (b) page 13 of MCG.</p> <p>http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p>	
2	The Chairman conducts a self-assessment of his performance.	Compliant	<p>BC Board, the Chairman, individual members, and each committee conducted an annual self-assessment of its performance.</p>	

3 4	<p>The individual members conduct a self-assessment of their performance</p> <p>Each committee conducts a self-assessment of its performance.</p>	<p>Compliant</p> <p>Compliant</p>	<p>In 2021, board self-assessment survey was conducted and made available to the members of the Board.</p> <p>Summary of board self-assessments results for 2021 is hereto attached as Annexes “M” (Individual board self-assessment); “M-1” (Audit Committee self-assessment); “M-2” (BROC self-assessment); “M-3” (Executive Committee self-assessment); “M-4” (Salary & Stock Option Committee self-assessment); and “M-5” (Nominations and Election Committee self-assessment).</p>	
5	<p>Every three years, the assessments are supported by an external facilitator.</p>	<p>Compliant</p>	<p>Identify the external facilitator and provide proof of use of an external facilitator.</p> <p>There is a policy on engaging external facilitator as provided in the Company’s MCG Art. III, 3.10.b, page 13, which was instituted on May 22, 2017.</p> <p>http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>BC engaged Center for Training and Development, Inc. as its External Facilitator for the year 2021. They conducted individual member of the board and committees’ self-assessment of its performance, analyzed and made commentary based on the results of the survey questionnaire. Conclusions and recommendations were made to address areas of improvement. (Please see attached Annex “N” – External Facilitator Certification on conduct and analysis of individual board and committees’ self-assessment, consistent with the above policy in the MCG.</p>	
Recommendation 6.2				
1	<p>Board has in place a system that provides, at the minimum, criteria and process to determine the performance of the Board, individual directors and committees.</p>	<p>Compliant</p>	<p>Provide information or link/reference to a document containing information on the system of the company to evaluate the performance of the board, individual directors and committees, including a feedback mechanism from shareholders</p>	

2	The system allows for a feedback mechanism from the shareholders.	Compliant	<p>BC Board has adopted a performance appraisal system that determines the performance of the Board, individual directors and committees. The tool used is the self-assessment exercise.</p> <p>See Summary of Board and Committees Self-Assessment Results for 2021 (Annexes “M”, “M-1”, “M-2”, “M-3”, “M-4” and “M-5”).</p> <p>The Board allows for a feedback mechanism from shareholders during the Q and A session of the Annual Stockholders’ Meeting. Pls refer to page 9 item X of Minutes of the Annual Stockholders’ Meeting held on Nov 10, 2021.</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/Minutes-of-10-November-2021-ASM.pdf</p> <p>Also in Info Statement (page 8 of 228 pp) disclosed in PSE Edge Portal announce date Oct 13, 2021 and posted in BC website</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9</p> <p>http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf</p> <p>Please refer to Board Charter, page 12, Art. IV Item 6.c.</p> <p>http://benguetcorp.com/wp-content/uploads/2020/07/P1-Board-Charter.pdf</p> <p>The Company has a policy on this feedback mechanism from shareholders as provided in the Company’s MCG Art. III, 3.10.c page 13.</p> <p>http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p>	
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Principle 7: Members of the Board are duty-bound to apply high ethical standards, taking into account the interests of all stakeholders.				
Recommendation 7.1				
1	Board adopts a Code of Business Conduct and	Compliant	Provide information on or link/reference to the company’s Code of Business Conduct and Ethics.	

	<p>Ethics, which provide standards for professional and ethical behavior, as well as articulate acceptable and unacceptable conduct and practices in internal and external dealings of the company.</p>		<p>Please refer to Annex "A" of MCG pages 34-37 for the Code of Ethics. http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>The Company has an Employee Code of Conduct and Discipline (ECCD) posted at company's website http://benguetcorp.com/wp-content/uploads/2020/09/2019-EMPLOYEE-CODE-OF-CONDUCT.pdf</p> <p>and Code of Business Conduct and Ethics posted in BC website http://benguetcorp.com/wp-content/uploads/2020/06/E.-Code-of-Conduct-of-Business-and-Ethics.pdf.</p>	
2	<p>The Code is properly disseminated to the Board, senior management and employees.</p>	Compliant	<p>Provide information on or discuss how the company disseminated the Code to its Board, senior management and employees.</p> <p>The Code is properly disseminated to the Board, senior management and employees.</p> <p>It has been the practice of the Company to orient new directors or employees as provided in the MCG Art. III item 3.11.a page 13 which states that, "All new directors joining the Board are required to undergo an orientation program to familiarize themselves of their statutory/fiduciary roles and responsibilities under the law, the Company's Articles and By-Laws and in the Board and Committees. The orientation is to ensure that they are properly apprised of the company's strategic plans, enterprise risks, group structure, business activities, Code of Business Conduct and this Corporate Governance Manual". Employees were asked to sign Acknowledgment and Agreement to Employees Code of Conduct distributed to each and every employee (please see Annex "O"). Each and every year thereafter, the Company and its mine-site operating units conduct similar orientations for new employees. Each employee has been given a copy of the Code and each employee submits an acknowledgment receipt to confirm receipt of a copy of the Code.</p> <p>Also, please refer to Board Charter page 13, Art. IV, Item 7.a.</p>	

			http://benguetcorp.com/wp-content/uploads/2020/07/P1-Board-Charter.pdf	
3	The Code is disclosed and made available to the public through the company website.	Compliant	<p>Provide a link to the company's website where the Code of Business Conduct and Ethics is posted/ disclosed.</p> <p>BC's Code of Conduct of Business Ethics is available to the public through the company website. Please refer to the company website under Corporate Governance. http://benguetcorp.com/wp-content/uploads/2020/06/E.-Code-of-Conduct-of-Business-and-Ethics.pdf</p>	
Supplement to Recommendation 7.1				
1	Company has clear and stringent policies and procedures on curbing and penalizing company involvement in offering, paying and receiving bribes.	Compliant	<p>Provide information on or link/reference to a document containing information on the company's policy and procedure on curbing and penalizing bribery</p> <p>BC has an Anti-Fraud, Corruption and Whistleblowing Policy Program. Please refer to the Policy posted in BC website. http://benguetcorp.com/wp-content/uploads/2020/06/anti-fraud-corruption-whistleblowing-policy.pdf</p>	
Recommendation 7.2				
1	Board ensures the proper and efficient implementation and monitoring of compliance with the Code of Business Conduct and Ethics.	Compliant	<p>Provide proof of implementation and monitoring of compliance with the Code of Business Conduct and Ethics and internal policies. Indicate who are required to comply with the Code of Business Conduct and Ethics and any findings on non-compliance.</p> <p>BC Board ensures the proper and efficient implementation and monitoring of compliance with its Code of Business Conduct and Ethics and internal policies. Please refer to Code of Business Conduct and Ethics posted in BC website. http://benguetcorp.com/wp-content/uploads/2020/06/E.-Code-of-Conduct-of-Business-and-Ethics.pdf</p> <p>It is expressly provided in the Company's MCG Art. III, item 3.8.A.r. page 11, among the general responsibilities of the Board is to ensure there is proper and efficient implementation and monitoring of</p>	
2	Board ensures the proper and efficient implementation and monitoring of compliance with company internal policies.	Compliant		

			<p>compliance with the Code of Business Conduct and Ethics and internal policies. http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>All directors, officers and employees are required to comply with the Code of Business Conduct and Ethics and Employees Code of Business Conduct and Ethics. http://benguetcorp.com/wp-content/uploads/2020/09/2019-EMPLOYEE-CODE-OF-CONDUCT.pdf</p> <p>http://benguetcorp.com/wp-content/uploads/2020/06/E.-Code-of-Conduct-of-Business-and-Ethics.pdf</p> <p>Please refer also to Art. IV, par. 7, page 12 of Board Charter. http://benguetcorp.com/wp-content/uploads/2020/07/P1-Board-Charter.pdf</p> <p>Offenses are dealt with in accordance with Code of ECD pp 5-8 http://benguetcorp.com/wp-content/uploads/2018/05/ECD%20with%20ee%20acknowledgement.pdf</p>	
Principle 8: The company should establish corporate disclosure policies and procedures that are practical and in accordance with best practices and regulatory expectations.				
Recommendation 8.1				
1	Board establishes corporate disclosure policies and procedures to ensure a comprehensive, accurate, reliable and timely report to shareholders and other stakeholders that gives a fair and complete picture of a company's financial condition, results and business operations.	Compliant	<p>Provide information on or link/reference to the company's disclosure policies and procedures including reports distributed/made available to shareholders and other stockholders</p> <p>Management, through the Stockholders' Relations Office (SRO), ensures there is public and timely disclosure of all material information about the company in compliance with SEC/PSE Disclosure Rules and 2015 SRC Rules.</p> <p>BC has an existing Policy on Disclosure Rules appended as Annex "B", page 38, of Manual of Corporate Governance. Please refer to BC website</p>	

			<p>http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf .</p> <p>Reports made available to shareholders and other stockholders are posted in BC website under “Company Disclosures” http://benguetcorp.com/company-disclosures/</p> <p>Also in PSE Edge Portal under Company Disclosures https://edge.pse.com.ph/companyDisclosures/form.do?cmpy_id=108</p> <p>Also Article VIII pages 31-32 of the Company MCG is devoted on the Company’s disclosure policies. http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p>	
1	<p>Company distributes or makes available annual and quarterly consolidated reports, cash flow statements, and special audit revisions. Consolidated financial statements are published within ninety (90) days from the end of the fiscal year, while interim reports are published within forty-five (45) days from the end of the reporting period.</p>	Compliant	<p>Indicate the number of days within which the consolidated and interim reports were published, distributed or made available from the end of the fiscal year and end of the reporting period, respectively.</p> <p>BC publicly discloses its consolidated financial statements as of Dec. 31, 2021 within the prescribed extended period under MC #2 S. 2022 dated Jan. 19, 2022 extending deadline to May 15, 2022. The Annual Report was made available in the PSE Edge Portal on May 16, 2022 under Company Disclosures 2021 Annual Report which was submitted 136 days from Dec. 31, 2021. However, SEC 17-A was submitted via email to SEC on May 13, 2022. Please refer to this link: https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>and to the BC website – http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>Interim quarterly reports are submitted within the prescribed period in accordance with SEC notices on extension of time:</p>	

		<p>First Quarter Report of 2021 was disclosed within the prescribed extended period under SEC Notice dated May 18, 2021 extending deadline to June 1, 2021. First Quarter Report was submitted 61 days from Dec 31, 2020 or on May 31, 2021; Pursuant to MC No. S. 2022, the Company submitted SEC Form 17-L requesting for extension for the submission of SEC Form 17-Q (First Quarter Report 2021) extending deadline from May 17, 2021 to May 31, 2021. BC submitted its first Quarter 2021 on May 31, 2021.</p> <p>Second Quarter Report was submitted on Aug 20, 2021, 51 days from June 30, 2021. Due date for submission was on Aug. 14, 2021. However, we submitted SEC Form 17-L on Aug. 11, 2021 requesting for extension of time to submit Second Quarter report.</p> <p>Third Quarter Report was submitted 50 days from Sept 30, 2021; due date is Nov. 16, 2021 but BC requested for extension of 5 days or until Nov. 21, 2021. We submitted the report on Nov. 19, 2021.</p> <p>Please refer to interim quarterly reports posted in BC website under Company Disclosures SEC 17-Q 2021.</p> <p>http://benguetcorp.com/wp-content/uploads/2021/06/1Q_2021_SEC-Form-17-Q_w-SEC-stamped-rcvd.pdf</p> <p>http://benguetcorp.com/wp-content/uploads/2021/08/BC-2021-Second-Quarter-Report_SEC-Form-17-Q.pdf</p> <p>http://benguetcorp.com/wp-content/uploads/2021/11/W-SEC-Stamp_BC-2021-Third-Quarter-Report_SEC-Form-17Q.pdf</p> <p>Also in PSE Edge Portal under Company Disclosures: Quarterly Report announce date May 31, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=1f28a5e5b53f36ec5d542af6f1e997b9</p> <p>Quarterly Report announce date August 20, 2021</p>	
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			https://edge.pse.com.ph/openDiscViewer.do?edge_no=fb695cd09e57886e5d542af6f1e997b9 Quarterly Report announce date Nov 19, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=fd0541d7521606435d542af6f1e997b9	
2	Company discloses in its Annual Report the principal risks associated with the identity of the company's controlling shareholders; the degree of ownership concentration; cross-holdings among company affiliates; and any imbalances between the controlling shareholders' voting power and overall equity position in the company.	Compliant	Provide link or reference to the company's Annual Report where the following are disclosed: 1. principal risks to minority shareholders associated with the identity of the company's controlling shareholders; 2. cross-holdings among company affiliates; and 3. any imbalances between the controlling shareholders' voting power and overall equity position in the company. BC discloses the shareholdings of controlling shareholders. Please refer to 2021 Annual Report posted in BC website (SEC Form 17-A) Item 5 pages 17-19 on Market for Issuer's Common Equity and Related Stockholder Matters, and Item 11 pages 43-46 on Security Ownership of Certain Beneficial Owners and Management. http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf Also in PSE Edge Portal under Company Disclosures, Annual Report announce May 16, 2022 pages 17-19 and pages 43-46 https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f BC upholds and protects the rights of minority shareholders. See MCG Art. 7.1.c iii pages 28-29 http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf	
Recommendation 8.2				
1	Company has a policy requiring all directors to disclose/report to the company any dealings in the	Compliant	Provide information on or link/reference to the company's policy requiring directors and officers to disclose their dealings in the company's share.	

	<p>company's shares within three business days.</p>	<p>Indicate actual dealings of directors involving the corporation's shares including their nature, number/percentage and date of transaction.</p> <p>It is Company policy for directors and officers to report their dealings in Company shares within 5 business days in accordance with SEC (under SEC Forms 23A/B) and PSE disclosure rules and Board Charter. Please refer to Company disclosures posted in BC website.</p> <p>SEC 23-A/B 2021 http://benguetcorp.com/company-disclosures/sec-filings-and-other-disclosures/sec-23-a-b/</p> <p>Also in PSE Edge Portal under Company Disclosures Initial Statement of Beneficial Ownership of Securities with announce date</p> <p>Jan 15, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=e23bc6aec5dc7a535d542af6f1e997b9</p> <p>Feb 11, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=c71dde9876320dc85d542af6f1e997b9</p> <p>Feb 17, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=3a85300b19221ba55d542af6f1e997b9</p> <p>March 18, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=2665cb1834cb6f915d542af6f1e997b9</p> <p>March 19, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=35105252897fe1ae5d542af6f1e997b9</p> <p>April 12, 2021</p>	
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			<p>June 9, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=dddccd4a0a11860a5d542af6f1e997b9</p> <p>June 11, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=5c84109b8b3d351d5d542af6f1e997b9</p> <p>June 14, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=81a1e6390de134d95d542af6f1e997b9</p> <p>June 15, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=67463794f293d54b5d542af6f1e997b9</p> <p>June 22, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=38b8d023d11731e65d542af6f1e997b9</p> <p>June 23, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=868d8e9a2df4223f5d542af6f1e997b9</p> <p>June 23, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=7f7ae2e558dcd9865d542af6f1e997b9</p> <p>July 2, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=09f4c95f3e863f1a5d542af6f1e997b9</p> <p>July 2, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=86485d51994e5b7f5d542af6f1e997b9</p> <p>July 2, 2021</p>	
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			<p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=c84a71de50972d5b5d542af6f1e997b9</p> <p>July 16, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=4d39d9c36e4df6db5d542af6f1e997b9</p> <p>Sept 1, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=b0f2b6f509832c845d542af6f1e997b9</p> <p>Nov 3, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=479d644c95179fe85d542af6f1e997b9</p> <p>Please refer to Art. IV, no. 3, page 11 of Board Charter requiring all directors and officers to disclose their dealings in the company's shares. http://benguetcorp.com/wp-content/uploads/2020/07/P1-Board-Charter.pdf</p>	
2	Company has a policy requiring all officers to disclose/report to the company any dealings in the company's shares within three business days.	Compliant	<p>Provide information on or link/reference to the company's policy requiring directors and officers to disclose their dealings in the company's share.</p> <p>Indicate actual dealings of directors involving the corporation's shares including their nature, number/percentage and date of transaction.</p> <p>All BC officers are required to disclose/report any dealings in the company's shares within five business days.</p> <p>Please refer to Art. IV, no. 3, page 11 of Board Charter requiring all directors and officers to disclose their dealings in the company's shares. http://benguetcorp.com/wp-content/uploads/2020/07/P1-Board-Charter.pdf</p>	

		<p>It has been the practice for directors and officers to report to the Company their dealings in Company shares within 5 business days in accordance with SEC (under SEC Forms 23 A/B) and PSE disclosure rules.</p> <p>Please refer to the Company’s website under tab Corporate Disclosure – SEC 23-A/B 2021. http://benguetcorp.com/company-disclosures/sec-filings-and-other-disclosures/sec-23-a-b/</p> <p>Security ownership of directors and officers are disclosed in the Public Ownership Report on a Quarterly basis and is included in the Notice of ASM pages 5-6 of DIS posted in BC website. http://benguetcorp.com/wp-content/uploads/2020/10/BC-Definitive-Information-Statement_SEC-Form-20-IS.pdf</p> <p>Please see PSE Edge Portal Company Disclosures on Public Ownership Report</p> <p>announce date - Jan 7, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=e39f6a548cf68c35d542af6f1e997b9</p> <p>announce date – April 14, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=b28e5fecbd68fe0d5d542af6f1e997b9</p> <p>announce date – July 8, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=2715117ff26045c65d542af6f1e997b9</p> <p>announce date - Oct 7, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=c90050e201c5c0495d542af6f1e997b9</p> <p>Also in PSE Edge Portal under Company Disclosures Information Statement announce date Oct. 13, 2021 pages 5-6 of DIS. https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9</p>	
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Supplement to Recommendation 8.2				
1	Company discloses the trading of the corporation's shares by directors, officers (or persons performing similar functions) and controlling shareholders. This includes the disclosure of the company's purchase of its shares from the market (e.g. share buy-back program).	Compliant	<p>Provide information on or link/reference to the shareholdings of directors, management and top 100 shareholders.</p> <p>Provide link or reference to the company's Conglomerate Map.</p> <p>BC discloses the trading of the corporation's shares by directors, officers and controlling shareholders. It has been the procedure for directors and officers to report to the Company their dealings in Company shares within 5 business days in accordance with SEC (under SEC Forms 23 B) and PSE disclosure rules.</p> <p>Please refer to the Company's website under tab Company Disclosures SEC Filings and Other Disclosures SEC 23 A/B 2021. http://benguetcorp.com/company-disclosures/sec-filings-and-other-disclosures/sec-23-a-b/</p> <p>Please see also pages 5-6 SEC Form 20-IS (2) Security Ownership of Management posted in BC website and disclosed in PSE Edge Portal announce date Oct. 13, 2021. http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9</p> <p>Please refer to pages 45-46 of SEC 17-A Annual Report paragraph on Security Ownership of Management in PSE Edge Portal announce date May 16, 2022 and posted in BC website. https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p>	(6)

and list of top 100 shareholders in PSE Edge Portal under Company Disclosures List of Top 100 Stockholders

(1) announce date Jan 14, 2021

https://edge.pse.com.ph/openDiscViewer.do?edge_no=7c5c2afac579803e5d542af6f1e997b9

(2) announce date April 15, 2021 (Preferred shares)

https://edge.pse.com.ph/openDiscViewer.do?edge_no=7b351e8832b24ca75d542af6f1e997b9

(3) announce date April 15, 2021 (Common shares)

https://edge.pse.com.ph/openDiscViewer.do?edge_no=1e0ef2f8950a82a95d542af6f1e997b9

(4) announce date July 9, 2021 (Preferred shares)

https://edge.pse.com.ph/openDiscViewer.do?edge_no=60339c06e6f5a4ab5d542af6f1e997b9

(5) announce date July 12, 2021 (Common shares)

https://edge.pse.com.ph/openDiscViewer.do?edge_no=bae54d37d044f0e25d542af6f1e997b9

(6) announce date Oct 13, 2021 (Preferred shares)

https://edge.pse.com.ph/openDiscViewer.do?edge_no=cf313fa210f1d3595d542af6f1e997b9

(7) announce date Oct 14, 2021 (Common shares)

https://edge.pse.com.ph/openDiscViewer.do?edge_no=895f14b0fba3c6815d542af6f1e997b9

Also in BC website under Home->About us->Shareholdings Structure 2021

<http://benguetcorp.com/home/about-us/shareholdings-structure/top-100-shareholders/>

as of March 31, 2021

			<p>http://benguetcorp.com/wp-content/uploads/2021/04/Top-100-Stockholders-w-PCD-Beneficial-Owner-participants-as-of-March-31-2021.pdf</p> <p>as of June 30, 2021 http://benguetcorp.com/wp-content/uploads/2021/07/Top-100-Stockholders-ABC-with-PCD-Beneficial-Owner-Participants-as-of-Jun-30-2021.pdf</p> <p>as of Sept 30, 2021 http://benguetcorp.com/wp-content/uploads/2021/11/Top-100-Stockholders-ABC-w-PCD-Beneficial-Owner-Participants-as-of-Sep-30-2021.pdf</p> <p>as of Dec 31, 2021 http://benguetcorp.com/wp-content/uploads/2022/01/Top-100-Stockholders-ABC-with-PCD-Beneficial-Owner-Participants-as-of-December-31-2021.pdf</p> <p>On company’s conglomerate map, please refer to 2021 Annual Report SEC 17-A page 355 of 439 pp (Schedule II Benguet Corp. and Subsidiaries Map showing the relationships of the companies within the group) posted in BC website http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>Also in PSE Edge Portal under Company Disclosures Annual Report announce date May 16, 2022, Schedule II page 108 of 115 pages of BC 2021 Audited Consolidated FS (2).pdf attachment to SEC 17-A https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>The Company has no buy-back program for the year covered by this report.</p>	
Recommendation 8.3				
1	Board fully discloses all relevant and material	Compliant	Provide link or reference to the directors’ academic qualifications, share ownership in the company, membership in other boards,	

	<p>information on individual board members to evaluate their experience and qualifications, and assess any potential conflicts of interest that might affect their judgment.</p>		<p>other executive positions, professional experiences, expertise and relevant trainings attended.</p> <p>BC and the Board fully disclose the profile of its directors. Refer to 2021 Annual Report (SEC Form 17-A) posted in BC website and in PSE Edge Portal, announced May 16, 2022, for reference to the directors’ academic qualifications, share ownership in the company, membership in other boards, other executive positions, professional experiences, expertise and relevant trainings attended (Annex “C”). Please pages 33-36 and page 45 (share ownership). https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>Also in PSE Edge Portal under Company Disclosures, Information Statement, announced Oct. 13, 2021, on pages 11-14 of attachment DIS.pdf and in BC website under Company Disclosures SEC 20-IS Part 1 pages 15-16. http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9</p> <p>Please refer also to the Company’s MCG regarding the standard qualifications of directors on page 5. http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p>	
2	<p>Board fully discloses all relevant and material information on key executives to evaluate their experience and qualifications, and assess any potential conflicts of</p>	<p>Compliant</p>	<p>Provide link or reference to the key officers’ academic qualifications, share ownership in the company, membership in other boards, other executive positions, professional experiences, expertise and relevant trainings attended.</p> <p>BC and the Board fully disclose the profile of its key executives.</p>	

	<p>interest that might affect their judgment.</p>		<p>Please refer to 2021 Annual Report (SEC Form 17-A) posted in BC website for reference to the officers' academic qualifications, share ownership in the company, membership in other boards, other executive positions, professional experiences, expertise and relevant trainings attended, pages 36-38, and page 45 (share ownership). https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>Also in PSE Edge Portal under Company Disclosures Information Statement, announced Oct. 13, 2021, on pages 15-16 of attachment DIS.pdf and in BC website under Company Disclosures SEC 20-IS Part 1 pp 15-16. http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9</p> <p>On relevant trainings attended by officers, please refer to PSE Edge Portal under company disclosures Other SEC Forms Reports and Requirements announced Nov. 17, 2021 and posted in BC website. http://benguetcorp.com/wp-content/uploads/2021/11/Attendance-to-CG-Seminar-2021_Directors-and-Officers-w-SEC-s_tamped-rcvd.pdf</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=9583a7db18e946ee5d542af6f1e997b9</p>	
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Recommendation 8.4			
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1	<p>Company provides a clear disclosure of its policies and procedure for setting Board remuneration, including the level and mix of the same.</p>	<p>Compliant</p>	<p>Disclose or provide link/reference to the company policy and practice for setting board remuneration</p> <p>BC provides a clear disclosure on Board remuneration. Please refer to pages 39-43 of 50 pages regarding Compensation of Directors in 2021 Annual Report (SEC Form 17-A) disclosed in PSE Edge</p>	
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			<p>Portal, announced May 16, 2022, and posted in BC website which includes per diem, incentive bonus plan, stock option plan. https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>Please refer to Compensation Charter posted in BC website. http://benguetcorp.com/wp-content/uploads/2020/07/P6-COMPENSATION-CHARTER.pdf</p> <p>Also refer to Art. IV, no. 5, page 12 of Board Charter. http://benguetcorp.com/wp-content/uploads/2020/07/P1-Board-Charter.pdf</p> <p>And to pages 14-15 of MCG on Salary Committee. http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p>	
2	<p>Company provides a clear disclosure of its policies and procedure for setting executive remuneration, including the level and mix of the same.</p>	Compliant	<p>Disclose or provide link/reference to the company policy and practice for determining executive remuneration</p> <p>BC has policies and procedures in place for setting executive remuneration. In addition to the executives' monthly compensation, other forms of remuneration include among others, incentive bonus plan, retirement plan, stock option plan and car plan. Please refer to pages 39-43 of 50 pages of the 2021 Annual Report (SEC Form 17-A) disclosed in PSE Edge Portal announce date May 16, 2022 and posted in BC website. https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>Also refer to MCG pp. 14-15 on Salary Committee</p>	

			http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf and Board Charter page 12 on Compensation http://benguetcorp.com/wp-content/uploads/2020/07/P1-Board-Charter.pdf .	
3	Company discloses the remuneration on an individual basis, including termination and retirement provisions.	Non-Compliant	Provide breakdown of director remuneration and executive compensation, particularly the remuneration of the CEO.	<p>BC disclosed the executive remuneration in an aggregate total for security reasons. Please refer to Item 10 Executive Compensation and to the paragraph on compensation of directors on page 39 of 50 pages of the 2021 Annual Report (SEC Form 17-A) disclosed in PSE Edge Portal announce date May 16, 2022 and posted in BC website. https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>Also disclosed on its Definitive Information Statement the aggregate total remuneration of its top five most highly compensated executives, pages 20-21 of 50 pages Item 6 Compensation of Directors and Executive Officers in PSE Edge Portal announce date Oct. 13, 2021 and posted in BC website. http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9</p> <p>On retirement or termination provisions, please refer to page 39 of 2021 Annual Report disclosed in PSE Edge</p>

				<p>Portal announce date May 16, 2022 and posted in BC website regarding the Retirement provisions. https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p>
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Recommendation 8.5

1	<p>Company discloses its policies governing Related Party Transactions (RPTs) and other unusual or infrequently occurring transactions in their Manual on Corporate Governance.</p>	Compliant	<p>Disclose or provide reference/link to company’s RPT policies. Indicate if the director with conflict of interest abstained from the board discussion on that particular transaction.</p> <p>BC discloses its RPT Policy on its website. http://benguetcorp.com/wp-content/uploads/2019/10/Amended-Related-Party-Transaction-Policy.pdf</p> <p>The Company observes its MCG Art. IV, 4.6 page 20 and par. 3.7 (c) page 9 on RPT. http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>Please refer also to RPT Charter page 3 par. 5 posted in BC website http://benguetcorp.com/wp-content/uploads/2020/07/P3-RPT-Charter.pdf</p> <p>and amended RPT Policy, pars. 7 and 8, page 6 posted in BC website http://benguetcorp.com/wp-content/uploads/2019/10/Amended-Related-Party-Transaction-Policy.pdf</p> <p>Pls refer also to Conflict of Interest Policy posted in BC website http://benguetcorp.com/wp-content/uploads/2019/05/Conflict-of-Interest.pdf.</p> <p>For CY 2021, there has been no case wherein a director in conflict of interest is involved in any of the related party transactions disclosed in the SEC 17-A. Please see item 12 Certain Relationships and Related Transactions of 2021 Annual Report (SEC Form 17A) disclosed in PSE Edge Portal under</p>	
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			<p>Company Disclosures announce date May 16, 2022 regarding Transactions with and/or Dependence on Related Parties on pages 11-12 of Annual Report and Note 29 of Conso FS attachment pp 82-83 of 115 pages.</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>Also 2021 SEC 17-A posted in BC website – pages 11-12 paragraph on Transactions with and/or Dependence on Related Parties and Note 29 of Conso FS on Related Party Transactions on pages 329-330 of 439 pages.</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p>	
2	Company discloses material or significant RPTs reviewed and approved during the year.	Compliant	<p>Provide information on all RPTs for the previous year or reference to a document containing the following information on all RPTs:</p> <ol style="list-style-type: none"> 1. name of the related counterparty; 2. relationship with the party; 3. transaction date; 4. type/nature of transaction; 5. amount or contract price; 6. terms of the transaction; 7. rationale for entering into the transaction; 8. the required approval (i.e., names of the board of directors approving, names and percentage of shareholders who approved) based on the company’s policy; and 9. other terms and conditions <p>BC transactions with its subsidiaries are in the normal course of business. Please refer to 2021 BC Annual Report (SEC Form 17A) Item 1 Business under Transactions with and/or Dependence on Related Parties (page 11-12 of 50 pages) for the dealings with its subsidiaries and on Item 12 for Certain Relationships and Related Transactions on page 46 of 50 pages on this link</p>	

			<p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>Please refer to the above link the BC Consolidated Financial Statement on Note 29 Related Party Disclosures (page 82-83 of 115 pages) for details.</p> <p>Please refer to item 12 Certain Relationships and Related Transactions of 2021 Annual Report (SEC Form 17A) regarding Transactions with and/or Dependence on Related Parties on page 46 and Note 29 on Related Party Transactions on page 329-331 of 439 pages posted in BC website</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>and in PSE Edge Annual Report announce date May 16, 2022 BC Annual Report 2021 – page 46 of 50 pages. attachment 2021 Audited Consolidated FS (see Note 29 page 82-83 of 115 pages)</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p>	
Supplement to Recommendation 8.5				
1	Company requires directors to disclose their interests in transactions or any other conflict of interests.	Compliant	<p>Indicate where and when directors disclose their interests in transactions or any other conflict of interests.</p> <p>BC requires its directors to disclose their interests in transactions involving any other conflict of interests. For CY 2021, no director had interest in transactions involving RPT or conflict of interests. Should there be any such future transaction, the directors are required to disclose.</p> <p>Please refer to BC amended RPT policy par. 7. http://benguetcorp.com/wp-content/uploads/2019/10/Amended-Related-Party-Transaction-Policy.pdf</p> <p>Please refer also to Conflict of Interest Policy posted in BC website</p>	

			http://benguetcorp.com/wp-content/uploads/2019/05/Conflict-of-Interest.pdf . Also refer to page 11 of Board Charter, par. 4 on Conflict of Interest which states: “All directors and employees of the Company must uphold the best interest of the Company at all times and must not act based on personal considerations that may affect the exercise of independent judgment, or the objective and effective performance of their work. All directors and employees must disclose all potential conflicts of interest. Directors and employees must disclose any financial interest or benefit from any transaction involving the Company, including intention to pursue corporate opportunity, to ensure that all potential conflicts of interest are brought to the attention of the appropriate Board-delegated body.” http://benguetcorp.com/wp-content/uploads/2020/07/P1-Board-Charter.pdf	
Optional: Recommendation 8.5				
1	Company discloses that RPTs are conducted in such a way to ensure that they are fair and at arms’ length.	Compliant	Provide link or reference where this is disclosed, if any Pls refer to page 5 of amended RPT Policy on evaluation of all RPTs http://benguetcorp.com/wp-content/uploads/2019/10/Amended-Related-Party-Transaction-Policy.pdf	
Recommendation 8.6				
1	Company makes a full, fair, accurate and timely disclosure to the public of every material fact or event that occur, particularly on the acquisition or disposal of significant assets, which could adversely affect the viability or the interest of its shareholders and other stakeholders.	Compliant	Provide link or reference where this is disclosed Please refer to Note 12 on Investment Properties page 64 of 111 of the Consolidated FS 2021 of BC & Subsidiaries attached to 2021 Annual Report SEC 17-A in PSE Edge Portal announce date May 16 2022 on reclassification of parcels of land located in San Marcelino, Zambales with a revalued amount of P83.06M were reclassified from property, plant and equipment to investment properties due to the change in use from being owner-occupied properties to being held for long-term capital appreciation	

			<p>Investment properties also include parcels of land located in Itogon, Benguet. Fair market value of land were assessed by an independent appraiser showing significant fair/appraised value in the books. https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>Also posted in BC website under Company Disclosures SEC 17-A 2021 Annual Report page 311 of 439 pp Note 12 on Investment Properties http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p>	
2	Board appoints an independent party to evaluate the fairness of the transaction price on the acquisition or disposal of assets.	Compliant	<p>Identify independent party appointed to evaluate the fairness of the transaction price Disclose the rules and procedures for evaluating the fairness of the transaction price, if any.</p> <p>In case of mergers, acquisitions and/or takeovers requiring shareholders' approval, the Board of Directors may appoint an independent party to evaluate the fairness of the terms of the transaction. For year 2021, there was no transaction on acquisition or disposal of assets made for this period. It has been the practice of the Company to engage an appraisal company to evaluate the acquisition or disposal value of the Company's property.</p> <p>The Board formed an Asset Recovery/ Disposal Committee tasked to determine and evaluate the fairness of transaction price with respect to the acquisition or disposal of assets. If necessary, the committee will engage an appraisal company to evaluate the acquisition or disposal value of assets. Biddings are conducted to determine the best transaction value and terms. Please see attached Annex "O" on guidelines/procedures of Contract, Purchasing, Bids and Awards Committee (CPBAC) which procedure/protocol is being followed in strict compliance by the Asset Recovery/Disposal Committee.</p>	
Supplement to Recommendation 8.6				
1	Company discloses the existence, justification and details on shareholder agreements, voting trust agreements, confidentiality	Compliant.	<p>Provide link or reference where these are disclosed.</p> <p>All material transactions/information are disclosed on the BC website under Company Disclosures SEC Form 17-C 2021.</p>	

	<p>agreements, and such other agreements that may impact on the control, ownership, and strategic direction of the company.</p>	<p>http://benguetcorp.com/company-disclosures/sec-filings-and-other-disclosures/sec-17-c/</p> <p>Also in PSE Edge Portal under Company Disclosures template Material Information/Transactions</p> <p>announce date – Jan 15, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=1097e50cb15549b55d542af6f1e997b9</p> <p>announce date – March 10, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=7c7e1ee95a8bce1a5d542af6f1e997b9</p> <p>announce date – March 15, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=ec012c9d559485245d542af6f1e997b9</p> <p>announce date – March 18, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=7fd4314bcda9739b5d542af6f1e997b9</p> <p>announce date – March 19, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=2526c4d4341a87be5d542af6f1e997b9</p> <p>announce date - March 19, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=b124078cc7f1df465d542af6f1e997b9</p> <p>announce date – March 19, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=ddf1a9340c1666bc5d542af6f1e997b9</p> <p>announce date – April 14, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=2042930e0db73e445d542af6f1e997b9</p> <p>announce date – April 19, 2021</p>	
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			<p>announce date – Aug 20, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=545ac764a5b0255a5d542af6f1e997b9</p> <p>announce date – August 24, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=96698c1acfc29cfd5d542af6f1e997b9</p> <p>announce date – Aug 24, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=81a3b10cd93f61c35d542af6f1e997b9</p> <p>announce date – Sept 21, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=9b88ae7c4172309a5d542af6f1e997b9</p> <p>announce date – Nov 11, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=5a8db06b885a71795d542af6f1e997b9</p> <p>announce date - Nov 11, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=1a4e2a01194ddf045d542af6f1e997b9</p> <p>The Company has not entered into shareholder agreement, voting trust agreement, confidentiality agreement and such other agreement that may have impact on the control, ownership, and strategic direction of the company during the period covered by this report. The Company shall disclose should there be such agreements under SEC Form 17-C.</p>	
Recommendation 8.7				
1	Company's corporate governance policies, programs and procedures are contained in its Manual	Compliant	Provide link to the company's website where the Manual on Corporate Governance is posted.	

	on Corporate Governance (MCG).		BC's corporate governance policies, programs and procedures are contained in its Manual of Corporate Governance. It is submitted to the SEC and PSE and is posted on the BC website. Please refer to the Company's website where the Manual on Corporate Governance is posted. http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf	
2	Company's MCG is submitted to the SEC and PSE.	Compliant	The Company submitted its MCG on May 30, 2017 in compliance to SEC Memo Circular No. 20 Series of 2016. Please see attached Annex "Q".	
3	Company's MCG is posted on its company website.	Compliant	Please refer to the Company's website http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf	
Supplement to Recommendation 8.7				
1	Company submits to the SEC and PSE on updated MCG to disclose any changes in its corporate governance practices.	Compliant	Provide proof of submission. Please see BC's proof of submission of the CG Manual to the SEC (Annex "Q") and to the PSE (Annex "Q-1"). The Company submitted to SEC its MCG on May 30, 2017 in compliance to SEC Memo Circular No. 20 Series of 2016 and to PSE on Jan. 1, 2017. There were no amendments made in the Company's MCG in the year covered by this report. The Company shall submit to SEC and PSE an updated version should there be any amendment in the Company's MCG. Please see attached Annex "Q" (BC letter dated May 29, 2017 with SEC stamped received May 30, 2017) and Annex "Q-1 (PSE Disclosure Form 17-18 – Other SEC Forms/Reports/Requirements) report dated Jan. 1, 2017.	
Optional: Principle 8				
1	Does the company's Annual Report disclose the following information:		Provide link or reference to the company's Annual Report containing the said information.	

	i. Corporate Objectives	Compliant	<p>Please refer to Item 1, Business on page 5 of 2021 Annual Report posted in BC website and disclosed in PSE Edge Portal announce date May 16, 2022.</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p>	
	i. Financial performance indicators	Compliant	<p>Please refer to 2021 Audited Consolidated Financial Statements page 351 of 439 pp on Financial Ratios – Index to the Financial Statements and Supplementary Schedules of SEC 17-A posted in BC website.</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>Also in PSE Edge Portal under Company Disclosures Annual Report 2021 Audited Consolidated FS announce date May 16, 2022 page 104 of 115 on Financial Ratios – Index to the Financial Statements and Supplementary Schedules</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p>	
	iii. Non-financial performance indicators	Compliant	<p>Please refer to 2021 Annual Report posted in BC website (SEC 17-A, par. III, Key Performance Indicators, page 29 of 439 pp.</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>Also in PSE Edge Portal under Company Disclosures Annual Report announce date May 16, 2022 page 29 of 50pp par. III Key Performance Indicators.</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p>	
	iv. Dividend Policy	Compliant	<p>Please refer to the Company's 2021 Annual Report (SEC Form 17-A) page 20 of 439 pages paragraph on Dividends posted in BC website and disclosed in PSE Edge Portal page 20 of 50.</p>	

			<p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>The Company is governed by its Amended Articles of Incorporation, pages 14-15 regarding the dividend rights and restrictions. Please refer to website on “About us.”</p> <p>http://benguetcorp.com/wp-content/uploads/2014/07/Jul-2016-Amended-BC-Articles-of-Incorporation.pdf</p>	
y.	Biographical details (at least age, academic qualifications, date of first appointment, relevant experience, and other directorships in listed companies) of all directors	Compliant	<p>Please refer to 2021 Annual Report (SEC Form 17-A) Item 9 pages 32-36 of 439 pages.</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>Also in PSE Edge Portal under Company Disclosures 2021- Annual Report announce date May 16, 2022 pages 32-36 of 50 pages.</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>Also in Information Statement SEC Form 20-IS pages 24-27 of 228 pp posted in BC website.</p> <p>http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf</p> <p>Also in PSE Edge Portal under Company Disclosures template Information Statement announce date Oct. 13, 2021 pages 24-27.</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9</p>	
i.	Attendance details of each director in all directors meetings held during the year.	Compliant	<p>Please refer to page 32 of 439pp, Item 9.A Board Attendance of 2021 Annual Report SEC Form 17-A posted in BC website.</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>Also in PSE Edge Portal under Company Disclosures 2021 Annual Report announce date May 16, 2022 page 32 Item 9.A. Board Attendance.</p>	

			https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f	
	i. Total remuneration of each member of the board of directors	Compliant	<p>The Company’s directors received per diems for their attendance in meetings of the board or board committee meetings. Please refer to 2021 Annual Report (SEC Form 17-A) pages 39-40 of 439 pp on Compensation of Directors.</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>Also in PSE Edge Portal under Company Disclosures 2021 Annual Report announce date May 16, 2022 pages 39-40 of 50pp paragraph on “Compensation of Directors.”</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p>	
2	The Annual Report contains a statement confirming the company’s full compliance with the Code of Corporate Governance and where there is non-compliance, identifies and explains reason for each such issue.	Compliant	<p>Provide link or reference to where this is contained in the Annual Report</p> <p>Pls refer to Item 13 on Corporate Governance page 47 of 439 pp of Annual Report which states that the Company confirms full compliance with its Manual of Corporate Governance. Also in PSE Edge Portal page 47 of 50 pp Annual Report SEC 17-A.</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p>	
3	The Annual Report/Annual CG Report discloses that the board of directors conducted a review of the company’s material controls (including operational, financial and compliance controls) and risk management systems.	Compliant	<p>Provide link or reference to where this is contained in the Annual Report</p> <p>Please refer to the Statement of Management’s Responsibility for Consolidated Financial Statement in 2021 Annual Report (SEC Form 17-A) on page 248 of 439pp which forms part of 2021 Audited Financial Statement posted in BC website.</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p>	

			<p>Also in PSE Edge Portal under Company Disclosures 2021 Annual Report announce date May 16, 2022 page 1 of 115 pp of attached audited conso FS</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p>	
4	<p>The Annual Report/Annual CG Report contains a statement from the board of directors or Audit Committee commenting on the adequacy of the company's internal controls/risk management systems.</p>	Compliant	<p>Provide link or reference to where this is contained in the Annual Report</p> <p>Please see attached Annex "I" statement signed by Audit Committee.</p> <p>Please refer also to page 248 of 439pp SEC 17-A Statement of Management's Responsibility (SMR) which forms part of the 2021 Audited Consolidated Financial Statements posted in BC website.</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>Also in PSE Edge Portal under Company Disclosures Annual Report announce date May 16, 2022 page 1 of 115 of attached Audited Conso FS.</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p>	
5	<p>The company discloses in the Annual Report the key risks to which the company is materially exposed to (i.e. financial, operational including IT, environmental, social, economic).</p>	Compliant	<p>Provide link or reference to where these are contained in the Annual Report</p> <p>Please refer to Note No. 34 on Financial Risk Management Objectives and Policies of BC CFS attached to 2021 Annual Report SEC 17-A pages 339-345 of 439pp posted in BC website.</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>Also in PSE Edge Portal 2021 Annual Report SEC 17-A announce date May 16, 2022 pp 93 to 98 of 115 pp of attached Consolidated Audited FS of BC & Subsidiaries.</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p>	

			<p>Please refer to the 2021 Annual Report (SEC Form 17-A) regarding the Business Risks pages 15-16 of 439 pp posted in BC website. http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>Also in PSE Edge Portal under Company Disclosures Annual Report announce date May 16, 2021 pages 15-16. https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p>	
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Principle 9: The company should establish standards for the appropriate selection of an external auditor, and exercise effective oversight of the same to strengthen the external auditor’s independence and enhance audit quality.

Recommendation 9.1

1	<p>Audit Committee has a robust process for approving and recommending the appointment, reappointment, removal, and fees of the external auditors.</p>	Compliant	<p>Provide information or link/reference to a document containing information on the process for approving and recommending the appointment, reappointment, removal and fees of the company’s external auditor.</p> <p>The Audit Committee has a robust process for approving and recommending the appointment, reappointment, removal and fees of the external auditor. Please refer to the Company’s MCG Art IV, item 4.3 (c) iv. a, b & c, pages 15-16. http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>Please refer to Audit Comm Charter, Art. IV, item 3.d 1, 2, & 3 page 4. http://benguetcorp.com/wp-content/uploads/2020/07/Audit-Committee-Charter-rev11.5.15.pdf</p>	
2	<p>The appointment, reappointment, removal, and fees of the external auditor is recommended by the Audit Committee, approved by the Board and ratified by the shareholders.</p>	Compliant	<p>Indicate the percentage of shareholders that ratified the appointment, reappointment, removal and fees of the external auditor.</p> <p>The Board, through the Audit Committee, endorses to the stockholders for approval the engagement of a duly accredited external auditor who shall undertake an independent audit and shall</p>	

		<p>provide an objective assurance on the preparation of the Company's financial statements.</p> <p>Please refer to the Company's 2021 Annual Report (SEC Form 17-A) Item 8 pages 32-33 of 439 pp posted in BC website. http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>Also in PSE Edge Portal under Company Disclosures Annual Report announce date May 16, 2022 pages 32-33 of 50 pp Item 8. https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>67.60% percent of the total outstanding shares of the company approved/ratified the re-appointment of external auditor (SGV) during the ASM held on Nov. 10, 2021. Please refer to BC website under Company Disclosures Minutes of All General or Special Meeting PSE Edge Portal Company Disclosures announce date Nov. 11, 2021 par. no. 5, page 6 of 9pp on Results of ASM. http://benguetcorp.com/wp-content/uploads/2021/11/Results-of-Nov-10-2021-ASM-and-Org-Mtg-of-BOD.pdf</p> <p>Also disclosed in PSE Edge Portal Company Disclosures announce date Nov 11, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=1a4e2a01194ddf045d542af6f1e997b9</p> <p>The audit fees billed by the external auditor is P5.5M for 2021. Please refer to Item 8 page 31 of 439 of SEC 17-A 2021 Annual Report posted in BC website. http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>Also in PSE Edge Portal Company Disclosures Annual Report announce date May 16, 2022 page 31 of 50pp of 2021 Annual Report. https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p>	
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3	For removal of the external auditor, the reasons for removal or change are disclosed to the regulators and the public through the company website and required disclosures.	Compliant	<p>Provide information on or link/reference to a document containing the company’s reason for removal or change of external auditor.</p> <p>The reason/s for the resignation, removal, change or cessation from service and date thereof of an external auditor shall be reported in BC’s annual and current reports. BC has not removed nor changed its external auditor for the period covered by this report.</p>	
Supplement to Recommendation 9.1				
1	Company has a policy of rotating the lead audit partner every five years.	Compliant	<p>Provide information on or link/reference to a document containing the policy of rotating the lead audit partner every five years.</p> <p>The Partner-in-charge is rotated every five years or earlier. The Company’s audit engagement partner for calendar year 2021 was Mr. Peter John R. Ventura, SEC accredited auditing partner of SGV. This is his third year as engagement partner for calendar year 2021. Previously, it was Mr. Alexis C. Zaragoza who was the partner in charge, assigned to the Company for 3 years. Please see Item 8 page 31 of 439pp of SEC 17-A 2021 Annual Report posted in BC website. http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>Also in PSE Edge Portal under Company Disclosures 2021 Annual Report announce date May 16, 2022 Item 8 page 31 of 50pp. https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>Please refer to MCG Art. IV 4.3.c.iv.d page 18. http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>Also please refer to Audit Charter Art. IV item 3 (d) 4 page 4. http://benguetcorp.com/wp-content/uploads/2020/07/Audit-Committee-Charter-rev11.5.15.pdf</p>	
Recommendation 9.2				

1	<p>Audit Committee Charter includes the Audit Committee's responsibility on:</p> <ul style="list-style-type: none"> i. Assessing the integrity and independence of external auditors; ii. Exercising effective oversight to review and monitor the external auditor's independence and objectivity; and iii. Exercising effective oversight to review and monitor the effectiveness of the audit process, taking into consideration relevant Philippine professional and regulatory requirements. 	<p>Compliant</p> <p>Compliant</p> <p>Compliant</p>	<p>Provide link/reference to the company's Audit Committee Charter</p> <p>Please refer to Audit Comm Charter Art. IV items 3 (d) on overseeing external auditor pages 4-5. http://benguetcorp.com/wp-content/uploads/2020/07/Audit-Committee-Charter-rev11.5.15.pdf</p>	
2	<p>Audit Committee Charter contains the Committee's responsibility on reviewing and monitoring the external auditor's suitability and effectiveness on an annual basis.</p>	<p>Compliant</p>	<p>Please refer to Audit Com Art Iv items 3 (d) on overseeing external auditor page 4. http://benguetcorp.com/wp-content/uploads/2020/07/Audit-Committee-Charter-rev11.5.15.pdf</p>	

Supplement to Recommendations 9.2

1	Audit Committee ensures that the external auditor is credible, competent and has the ability to understand complex related party transactions, its counterparties, and valuations of such transactions.	Compliant	<p>Provide link/reference to the company's Audit Committee Charter</p> <p>Please refer to Audit Comm Art. IV items 3 (d) on overseeing external auditor page 4. http://benguetcorp.com/wp-content/uploads/2020/07/Audit-Committee-Charter-rev11.5.15.pdf</p>	
2	Audit Committee ensures that the external auditor has adequate quality control procedures.	Compliant	<p>Please refer to Audit Comm Art. IV items 3 (d) on overseeing external auditor page 4. http://benguetcorp.com/wp-content/uploads/2020/07/Audit-Committee-Charter-rev11.5.15.pdf</p>	
Recommendation 9.3				
2	Audit Committee stays alert for any potential conflict of interest situations, given the guidelines or policies on non-audit services, which could be viewed as impairing the external auditor's objectivity.	Compliant	<p>Disclose the nature of non-audit services performed by the external auditor, if any.</p> <p>Please refer to MCG Article IV, 4.3.c.iv.e page 18. http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>Also please refer to Audit Comm Charter Art. IV, item 3.d.5 page 5. http://benguetcorp.com/wp-content/uploads/2020/07/Audit-Committee-Charter-rev11.5.15.pdf</p>	
Supplement to Recommendation 9.3				
1	Fees paid for non-audit services do not outweigh the fees paid for audit services	Compliant	<p>Provide information on audit and non-audit fees paid.</p> <p>Please refer to 2021 Annual Report (SEC 17-A) in PSE Edge Portal under Company Disclosures Annual Report announce date May 16, 2022 page 31 of 50 pages. Also on page 31 of 439 item 8 posted in BC website.</p> <p>Audit fees of SGV & Co. for BC and subsidiaries are P5.5 million for 2021 and P5.5 million for 2020. There were no other services rendered by the external auditor other than the usual audit services.</p>	

			https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf	
Additional Recommendation to Principle 9				
1	Company's external auditor is duly accredited by the SEC under Group A category.	Compliant	<p>Provide information on company's external auditor, such as:</p> <ol style="list-style-type: none"> 1. Name of the audit engagement partner; 2. Accreditation number; 3. Date Accredited; 4. Expiry date of accreditation; and 5. Name, address, contact number of the audit firm. <p>The Company's external auditor, SGV & Co., lead audit partner is: Mr. Peter John R. Ventura Partner CPA Certificate No. 0113172 TIN 301-106-741 BOA/PRC Reg. No. 0001, Aug. 25, 2021, valid until April 15, 2024 SEC Partner Accreditation no: 113172-SEC (Group A) Valid to cover audit of 2021 financial statements of SEC covered Institutions SEC Firm Accreditation No. 0001-SEC (Group A) Valid to cover audit of 2021 to 2025 financial statements of SEC Covered institutions BIR Accreditation No. 08-001998-140-2021, Nov 10, 2021, valid until Nov 9, 2024 PTR No. 8854381, January 3, 2022, Makati City</p> <p>His appointment commenced in year 2019.</p>	
2	Company's external auditor agreed to be subjected to the SEC Oversight Assurance Review (SOAR) Inspection Program conducted by the SEC's Office of the General Accountant (OGA)	Compliant	<p>Provide information on the following:</p> <ol style="list-style-type: none"> 1. Date it was subjected to SOAR inspection, if subjected; 2. Name of the Audit firm; and 3. Members of the engagement team inspected by the SEC. 	

			SGV & Co. agreed to be subjected to the SEC Oversight Assurance Review (SOAR) Inspection Program by the SEC’s OGA. The inspection was done from Nov 12 – 23, 2018. The names of the members of the engagement team were provided.	
Principle 10: The company should ensure that the material and reportable non-financial and sustainability issues are disclosed.				
Recommendation 10.1				
1	Board has a clear and focused policy on the disclosure of non-financial information, with emphasis on the management of economic, environmental, social and governance (EESG) issues of its business, which underpin sustainability.	Compliant	<p>Disclose or provide link on the company’s policies and practices on the disclosure of non-financial information, including EESG issues.</p> <p>The Board commits at all times to full disclosure of material information, including non-financial information, with emphasis on the management of economic, environment, social and governance issues of the business, which underpin sustainability. It shall cause the filing of all required information through the appropriate Exchange mechanisms for listed companies and submissions to the Commission for the interest of its stockholders and other stakeholders.</p> <p>Please refer to MCG Art. VIII, par 8.6 and Art. IX page 32, and Annex B page 38 of MCG on Policy on Disclosure Rules. http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>Please refer to BC website under Company Disclosures SEC 17-A attached SUSTAINABILITY REPORT 2021 Annual Report announce date May 16, 2022 on attached SUSTAINABILITY REPORT Annex “B” (Annual Environmental Protection and Enhancement Program (AEPEP) DENR 2021 Certificate of Approval page 152 of 439 pages; Annex “J” (Environmental Compliance Certificate CAR 1012-174-2110) pages 224 of 439 pages; Annex “K” (Summary/Registry of Regulatory Compliance) pages 227-239 of 439 pages; and Annex “O” Annual Social Development and Management Program (ASDMP) MGB-DENR Certificate of Approval #2022-03-CAR pages 246-247 of 439 pages on management of environmental and community related issues of the Company. http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p>	

			<p>Also in PSE Edge Portal under Company Disclosures SEC 17-A attached SUSTAINABILITY REPORT Annex “B” page 102 of 197 pp (Annual Environmental Protection and Enhancement Program (AEPEP) DENR 2021-07-CAR Certificate of Approval; Annex “J” (Environmental Compliance Certificate) pp 174-176 of 197 pages; Annex “K” (Summary of Regulatory Compliance) pp 177-189 of 197 pages; and Annex “O” Annual Social Development and Management Program (ASDMP) MGB-DENR Certificate of Approval #2022-03-CAR pp 196-197 SUSTAINABILITY REPORT attachment</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p>	
2	Company adopts a globally recognized standard/framework in reporting sustainability and non-financial issues.	Compliant	<p>Provide link to Sustainability Report, if any. Disclose the standards used.</p> <p>The sustainability initiatives of the company is an integral part of its Annual Report. The Company adopts the reporting framework/ standard set by regulatory bodies. Pls refer to Sustainability Report Annex “A” attached to SEC 17-A 2021 Annual Report on pp 51-247 of 439 pages posted in BC website</p> <p>http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>Also in PSE Edge Portal under Company Disclosures Annual Report announce date May 16, 2022 BC Sustainability Report attached as Annex A of SEC 17-A pp 1-197</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p>	
<p>Principle 11: The company should maintain a comprehensive and cost-efficient communication channel for disseminating relevant information. This channel is crucial for informed decision-making by investors, stakeholders and other interested users.</p>				
<p>Recommendation 11.1</p>				
1	Company has media and analysts’ briefings as channels of communication to ensure the timely and accurate dissemination of	Compliant	<p>Disclose and identify the communication channels used by the company (i.e., website, Analyst’s briefing, Media briefings /press conferences, Quarterly reporting, Current reporting, etc.). Provide links, if any.</p>	

	<p>public, material and relevant information to its shareholders and other investors.</p>		<p>To ensure timely and accurate dissemination of public, material and relevant information to its shareholders, BC provides update on its operations disclosed in its Quarterly Reports under SEC 17-Q, Annual Report under SEC 17-A and Company disclosures under SEC Form 17-C through its website and PSE Edge Portal.</p> <p>SEC 17-Q – 2021 May 31, 2021 – First Quarter Report http://benguetcorp.com/wp-content/uploads/2021/06/1Q_2021_SEC-Form-17-Q_w-SEC-stamped-rcvd.pdf</p> <p>August 19, 2021 – Second Quarter Report http://benguetcorp.com/wp-content/uploads/2021/08/BC-2021-Second-Quarter-Report_SEC-Form-17-Q.pdf</p> <p>November 17, 2021 – Third Quarter Report http://benguetcorp.com/wp-content/uploads/2021/11/W-SEC-Stamp_BC-2021-Third-Quarter-Report_SEC-Form-17Q.pdf</p> <p>and PSE Edge Portal with Benguet Corp symbol “BC” under Company Disclosures Quarterly Report – announce date May 31, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=1f28a5e5b53f36ec5d542af6f1e997b9</p> <p>Quarterly Report – announce date Aug 20, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=fb695cd09e57886e5d542af6f1e997b9</p> <p>Quarterly Report – announce date Nov 19, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=fd0541d7521606435d542af6f1e997b9</p>	
Supplement to Principle 11				
1	Company has a website disclosing up-to-date	Compliant	Provide link to company website	

	information on the following:		Pls refer to BC website http://benguetcorp.com/	
	a. Financial statements/reports (latest quarterly)	Compliant	<p>Please refer to 2021 First, Second and Third Quarter Reports under SEC Form 17Q posted in BC website</p> <p>May 31, 2021 – First Quarter Report http://benguetcorp.com/wp-content/uploads/2021/06/1Q_2021_SEC-Form-17-Q_w-SEC-stamped-rcvd.pdf</p> <p>August 19, 2021 – Second Quarter Report http://benguetcorp.com/wp-content/uploads/2021/08/BC-2021-Second-Quarter-Report_SEC-Form-17-Q.pdf</p> <p>November 17, 2021 – Third Quarter Report http://benguetcorp.com/wp-content/uploads/2021/11/W-SEC-Stamp_BC-2021-Third-Quarter-Report_SEC-Form-17Q.pdf</p> <p>Also in PSE Edge Portal under Company Disclosures template name Quarterly Report</p> <p>Quarterly Report – announce date May 31, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=1f28a5e5b53f36ec5d542af6f1e997b9</p> <p>Quarterly Report – announce date Aug 20, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=fb695cd09e57886e5d542af6f1e997b9</p> <p>Quarterly Report – announce date Nov 19, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=fd0541d7521606435d542af6f1e997b9</p>	
	b. Materials provided in briefings to analysts and media	Compliant	Please refer to PSE Edge Portal Company Disclosures announce date May 25, 2021 under template “Material Information/Transactions” on BC Press Release about higher consolidated net income for 2020 with combined revenues sourced mainly from nickel, gold and lime sales	

		<p>registered at P1.6 Billion, 100% higher than 2019 revenues of P802 Million. https://edge.pse.com.ph/openDiscViewer.do?edge_no=ac187f43097198e15d542af6f1e997b9</p> <p>Please refer to PSE Edge Portal Company Disclosures on Press Release distributed to media announce date June 2, 2021 on First Quarter 2021 results where BC registered consolidated net income of P518.6 Million or over nine times the P56.7 Million net income for the same period last year https://edge.pse.com.ph/openDiscViewer.do?edge_no=1886474dd053eaf35d542af6f1e997b9</p> <p>Pls refer to PSE Edge Portal Company Disclosures on Press Release distributed to media dated June 16, 2021 on the appointment of new director of BC's wholly-owned subsidiary, Benguetcorp Nickel Mines, Inc. https://edge.pse.com.ph/openDiscViewer.do?edge_no=e48ebc1f82eb077f5d542af6f1e997b9</p> <p>Please refer to PSE Edge Portal Company Disclosures announce date August 20, 2021 on BC's mid-year revenue which climbed to ₱2.3 Billion, more than triple compared to the revenue a year ago of ₱702 Million. https://edge.pse.com.ph/openDiscViewer.do?edge_no=545ac764a5b0255a5d542af6f1e997b9</p> <p>Also posted in BC website under Press Materials and News http://benguetcorp.com/wp-content/uploads/2022/03/Benguet-Corp-Records-Higher-Consolidated-Net-Income-in-2020.pdf http://benguetcorp.com/wp-content/uploads/2022/03/Press-Release_Benguet-Corp-registered-higher-first-quarter-2021-results.pdf http://benguetcorp.com/wp-content/uploads/2022/04/SEC-Form-17-C_Press-Release.pdf</p>	
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			Please refer also to emails sent to media for Press Release publication. (Annexes "R", "R-1", "R-2", and "R-3".	
	c. Downloadable Annual Report	Compliant	<p>Please refer to 2021 Annual Report (SEC 17-A) posted in BC website: http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>Also in PSE Edge Portal with Benguet Corp symbol "BC" under Company Disclosures Annual Report announce date May 16, 2022 https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p>	
	d. Notice of ASM and/or SSM	Compliant	<p>Pls refer to Notice of ASM posted in BC website http://benguetcorp.com/company-disclosures/notice-of-annual-or-special-stockholders-meetings/</p> <p>In PSE Edge Portal under Company Disclosures Information Statement DIS announce date Oct 13, 2021 and posted in BC website under Company Disclosures Information Statement http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9</p>	
	e. Minutes of ASM and/or SSM	Compliant	<p>Pls refer to Minutes of Nov 10, 2021 posted in the Company's website http://benguetcorp.com/wp-content/uploads/2022/05/Minutes-of-10-November-2021-ASM.pdf</p> <p>Results of the Nov 10, 2021 ASM were also posted the next day in BC website under Company Disclosures Minutes of All General or Special Stockholders Meetings http://benguetcorp.com/wp-content/uploads/2021/11/Results-of-Nov-10-2021-ASM-and-Org-Mtg-of-BOD.pdf</p>	

			Also ASM results were disclosed to the SEC/PSE within the prescribed period. Pls refer to PSE Edge Portal under Company Disclosures template Results of Annual or Special Stockholders Meeting announce date Nov 11, 2021 https://edge.pse.com.ph/openDiscViewer.do?edge_no=1a4e2a01194ddf045d542af6f1e997b9	
	f. Company's Articles of Incorporation and By-Laws	Compliant	Please refer to the Company website under "About Us" http://benguetcorp.com/wp-content/uploads/2014/07/Jul-2016-Amended-BC-Articles-of-Incorporation.pdf http://benguetcorp.com/wp-content/uploads/2020/01/Jan-2020-Amended-Bylaws.pdf	
Additional Recommendation to Principle 11				
1	Company complies with SEC-prescribed website template.	Compliant	Please refer to Company's website: http://benguetcorp.com/	
Internal Control System and Risk Management Framework				
Principle 12: To ensure the integrity, transparency and proper governance in the conduct of its affairs, the company should have a strong and effective internal control system and enterprise risk management framework.				
Recommendation 12.1				
1.	Company has an adequate and effective internal control system in the conduct of its business	Compliant	List quality service programs for the internal audit functions. Indicate frequency of review of the internal control system BC has an adequate and effective internal control system. Please see attached Annex "S" on Internal Audit's accomplishments for CY 2021. Please refer to Internal Audit Charter posted in BC website http://benguetcorp.com/wp-content/uploads/2020/06/O.-BC-Internal-Audit-Charter.pdf Review of the internal control system is done annually. (par VIII, p 3) http://benguetcorp.com/wp-content/uploads/2020/06/O.-BC-Internal-Audit-Charter.pdf	

2	<p>Company has an adequate and effective enterprise risk management framework in the conduct of its business.</p>	Compliant	<p>Identify international framework used for Enterprise Risk Management Provide information or reference to a document containing information on:</p> <ol style="list-style-type: none"> 1. Company’s risk management procedures and processes 2. Key risks the company is currently facing 3. How the company manages the key risks Indicate frequency of review of the enterprise risk management framework. <p>BC has an adequate and effective risk management framework. Please refer to ERM Policy posted in BC website. http://benguetcorp.com/wp-content/uploads/2020/07/Enterprise-Risk-Mgnt-Framework.pdf</p> <p>Pls see pp 7-8 pars 3 & 4 on Governance and Reporting Structure; page 9, par 8 on ERM processes and approach; page 10 pars 11-14 on key risk identification and on page 13 par 24 on how BC manages the risk page 13, par. 24.</p> <p>Pls see page 15, par G on frequency of ERM review. ERM shall be reviewed and updated as needed as a result of changes in the laws, rules and regulations. http://benguetcorp.com/wp-content/uploads/2020/07/Enterprise-Risk-Mgnt-Framework.pdf</p> <p>Pls refer also to the Board Risk Oversight Comm Charter posted in BC website par 4 pp 3-4 on Procedures http://benguetcorp.com/wp-content/uploads/2020/06/C.-Board-Risk-Oversight-Comm-Charter.pdf</p> <p>Please refer to 2021 Annual Report (SEC Form 17-A) pp 15-16 of 439 pages paragraph on Business Risks and How the Company manages these risks posted in BC website http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>Also in PSE Edge Portal with Benguet Corp symbol “BC” under Company Disclosures Annual Report announce date May 16, 2022 pp 15-16 of 50 pages</p>	
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			http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf	
Supplement to Recommendations 12.1				
1	Company has a formal comprehensive enterprise-wide compliance program covering compliance with laws and relevant regulations that is annually reviewed. The program includes appropriate training and awareness initiatives to facilitate understanding, acceptance and compliance with the said issuances.	Compliant.	<p>Provide information on or link/ reference to a document containing the company’s compliance program covering compliance with laws and relevant regulations. Indicate frequency of review.</p> <p>Please refer to Appendix “J” (Environmental Compliance Certificate) pp 224-226 of 439pp, Appendix “K” (Summary of Status – Regulatory Compliance) pp 227-239, Appendix “P” (Annual Social Development and Management Program (ASDMP) DENR-MGB Certificate of Approval #2022-03-CAR pp. 246-247 of 439 pages of Sustainability Report attached as Annex “A” to 2021 Annual Report (SEC 17-A) on Company’s compliance program covering compliance with laws and relevant regulations.</p> <p>Pls refer to discussion on the company’s compliance on relevant laws and regulations presented in item 1, pages 6-10 of 439 pp, SEC 17-A posted in BC website http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>Also in PSE Edge Portal under Company Disclosures 2021 Annual Report pp 6-10 of 50 pages, announce date May 16, 2022. https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>Management reviews regulatory compliances/requirements of various government agencies periodically or annually as there are usually new regulations being imposed by DENR or BIR or SEC. Staff are sent to training institutions seminars and trainings to keep them abreast of government regulations.</p>	
Optional Recommendation 12.1				
1	Company has a governance process on IT issues		Provide information on IT governance process	

	including disruption, cyber security and disaster recovery, to ensure that all key risks are identified, managed and reported to the board.			
Recommendation 12.2				
1	Company has in place an independent internal audit function that provides an independent and objective assurance, and consulting services designed to add value and improve the company's operations.	Compliant	<p>Disclose if the internal audit is in-house or outsourced. If outsourced, identify external firm.</p> <p>BC's internal audit is in-house, and duties and responsibilities are listed in the Internal Audit Charter. The Internal Audit Department is a separate and independent unit that is accountable and directly reports to the Board's Audit Committee. It is headed by Mr. Glenn John V. Raras, a Certified Public Accountant (CPA) and a Certified Internal Auditor (CIA), and currently completing his final Strategic Paper for his Masters in Management.</p> <p>Among others, the Internal Audit Head's role is to provide independent and objective assurance and consulting services to Management, Board of Directors, and Stockholders designed to add value and improve the company's operations.</p> <p>Please refer to the Internal Audit Charter Mission, par. 1 page 1 in the company's website. http://benguetcorp.com/wp-content/uploads/2020/06/O.-BC-Internal-Audit-Charter.pdf</p>	
Recommendation 12.3				
1	Company has a qualified Chief Audit Executive (CAE) appointed by the Board.	Compliant	<p>Identify the company's Chief Audit Executive (CAE) and provide information on or reference to a document containing his/her responsibilities.</p> <p>The Company's Internal Audit Office Head appointed by the Board is Mr. Glenn John V. Raras who is performing the functions of Chief Audit Executive (CAE). Pls refer to attached Annex "E" on Chief Audit/Internal Audit Head qualifications.</p>	

			<p>Please refer also to Internal Audit Charter for his responsibilities, paragraph V, page 2 http://benguetcorp.com/wp-content/uploads/2020/06/O.-BC-Internal-Audit-Charter.pdf</p> <p>Also in Company's MCG page 26, item 6.2(a) posted in BC website http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p>	
2	CAE oversees and is responsible for the internal audit activity of the organization, including that portion that is outsourced to a third party service provider.	Compliant.	<p>Please refer to Internal Audit Charter page 2 on Internal Audit Head responsibilities: http://benguetcorp.com/wp-content/uploads/2020/06/O.-BC-Internal-Audit-Charter.pdf</p> <p>Also in Company's MCG page 26, item 6.2(a) posted in BC website http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>No internal audit activity was outsourced in 2021.</p>	
3	In case of a fully outsourced internal audit activity, a qualified independent executive or senior management personnel is assigned the responsibility for managing the fully outsourced internal audit activity.	Compliant	<p>Identify qualified independent executive or senior management personnel, if applicable.</p> <p>BC's internal audit function is done 100% in-house. The Company has no outsourced internal audit activity for 2021. All internal audit activities were conducted in-house by Internal Audit Office through its head, Mr. Glenn John V. Raras, who is acting as the CAE, and his audit staff.</p>	
Recommendation 12.4				
1	Company has a separate risk management function to identify, assess and monitor key risk exposures.	Compliant	<p>Provide information on company's risk management function.</p> <p>The Company has a separate Risk Management Office headed by a Chief Risk Officer. Please refer to Board Risk Oversight Committee (BROC) Charter page 1 par 1 for BROC's primary purpose and authority, roles and responsibilities on pp 2-3 par 3. http://benguetcorp.com/wp-content/uploads/2020/06/C.-Board-Risk-Oversight-Comm-Charter.pdf</p>	

			<p>Also pls refer to Company's MCG page 27, Item 6.3(a) posted in BC website http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p>	
Supplement to Recommendation 12.4				
1	Company seeks external technical support in risk management when such competence is not available internally.	Compliant	<p>Identify source of external technical support, if any.</p> <p>BC seeks external technical support in risk management from various consultants and third parties.</p> <p>The Company engages external law firms and former technical managers as consultant as the need arises.</p>	
Recommendation 12.5				
1	In managing the company's Risk Management System, the company has Chief Risk Officer (CRO), who is the ultimate champion of Enterprise Risk Management (ERM).	Compliant	<p>Identify the company's Chief Risk Officer (CRO) and provide information on or reference to a document containing his/her responsibilities and qualifications/background.</p> <p>BC has a Chief Risk Officer. The BROC is headed by a Chief Risk Officer in the person of Ms. Pamela M. Gendrano. Pls refer to her responsibilities on page 3 of BROC Charter posted in BC website. http://benguetcorp.com/wp-content/uploads/2020/06/C.-Board-Risk-Oversight-Comm-Charter.pdf</p> <p>Pls refer also to page 27, par. 6.4(a) of MCG on Chief Risk Officer's functions posted in BC website. http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>Ms. Gendrano's qualifications/background are indicated on pages 37-38 of 439 pages, SEC 17-A 2021 Annual Report posted in BC website http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p>	

			<p>Also in PSE Edge Portal with Benguet Corp symbol “BC” under Company Disclosures Annual Report announce date May 16, 2022 page 37-38 of 50 pages https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>Also in BC website under company disclosures SEC Filings SEC 20-IS page 29 of 228 pages http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf</p> <p>Also in PSE Edge Portal with BenguetCorp symbol “BC” under Company Disclosures Information Statement announce date Oct 13, 2021, page 29 of 228 pages https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9</p>	
2	CRO has adequate authority, stature, resources and support to fulfill his/her responsibilities.	Compliant	<p>The CRO has adequate authority, stature, resources and support to fulfill his responsibilities.</p> <p>The BROC Management Office is headed by a Chief Risk in the person of Ms. Pamela M. Gendrano. Pls refer to her responsibilities on page 3 of BROC Charter. There is also a Board level BRO Committee. http://benguetcorp.com/wp-content/uploads/2020/06/C.-Board-Risk-Oversight-Comm-Charter.pdf</p> <p>Ms. Gendrano’s qualifications/background are indicated on pages 37-38 of 439 pages, SEC 17-A 2021 Annual Report posted in BC website and in PSE Edge Portal with Benguet Corp symbol “BC” under Company Disclosures Annual Report announce date May 16, 2022 pages 37-38 of 50 pages http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p>	

			<p>Also in BC website under company disclosures SEC Filings SEC 20-IS page 29 of 228 pages and in PSE Edge Portal with Benguet Corp symbol "BC" under Company Disclosures Information Statement announce date Oct 13, 2021</p> <p>http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9</p> <p>Also in MCG page 27, Item 6.4(a)</p> <p>http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p>	
Additional Recommendation to Principle 12				
1	Company's Chief Executive Officer and Chief Audit Executive attest in writing, at least annually, that a sound internal audit, control and compliance system is in place and working effectively.	Compliant	Please see attached Attestation of President, Executive Vice President and Internal Audit Head (Annex "S")	
Cultivating a Synergic Relationship with Shareholders				
Principle 13: The company should treat all shareholders fairly and equitably, and also recognize, protect and facilitate the exercise of their rights.				
Recommendation 13.1				
1	Board ensures that basic shareholder rights are disclosed in the Manual on Corporate Governance	Compliant.	<p>Provide link or reference to the company's Manual on Corporate Governance where shareholders' rights are disclosed.</p> <p>Shareholders' rights are disclosed in the Company's Manual on Corporate Governance, Art VII pages 28-31 on Shareholders rights posted in the Company's website:</p> <p>http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf .</p>	
2	Board ensures that basic shareholder rights are	Compliant.	Provide link to the Company's website.	

	disclosed on the company's website.		The basic shareholder rights are disclosed in the company's website under the tab CORPORATE GOVERNANCE. http://benguetcorp.com/corporate-governance/shareholders/	
Supplement to Recommendation 13.1				
1	Company's common share has one vote for one share.	Compliant	<p>Each common and preferred share of BC entitles the person, in whose name the share is registered in the books of the Corporation, to one vote.</p> <p>Please refer to MCG Art VII par 7.1 (ii) b page 29 regarding the entitlement of shareholders to one vote for one share for shares held as of the established record date. http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>Please refer also to the company's Articles of Incorporation, Article Seventh, B page 26: http://benguetcorp.com/wp-content/uploads/2014/07/Jul-2016-Amended-BC-Articles-of-Incorporation.pdf</p> <p>Also in BC website and in PSE Edge Portal announce date Oct 13, 2021 under company disclosures Definitive Information Statement SEC Form 20-IS page 17-20 of 228 pages, Item 4 Voting Securities and Principal Holders Thereof. http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9</p>	
2	Board ensures that all shareholders of the same class are treated equally with respect to voting rights, subscription rights and transfer rights.	Compliant	<p>Provide information on all classes of shares, including their voting rights if any.</p> <p>The Company has 3 classes of stock: The Common Class A and the Convertible Preferred Class A shares can be owned only by Philippine Citizens because the Company is engaged in mining business. Under Philippine law, at least 60% of the outstanding capital stock of a company engaged in mining must be owned by Philippine citizens. The</p>	

		<p>third class of the company’s shares is its Common Class B which may be owned by anyone regardless of nationality or citizenship. Pls see Amended Articles of Incorporation Article SEVENTH pp. 8-22 on all classes of shares, including their voting rights (page 22, par d) and page 24 par (B) posted in BC website. http://benguetcorp.com/wp-content/uploads/2014/07/Jul-2016-Amended-BC-Articles-of-Incorporation.pdf</p> <p>Also in SEC-17 A 2021 Annual Report pages 17-19 of 439 pp Item 5 Market Information posted in BC website and in PSE Edge Portal under company disclosures Annual Report announce date May 16, 2022 http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>Also in BC website and in PSE Edge Portal announce date Oct 13, 2021 under company disclosures Definitive Information Statement SEC Form 20-IS pages 17-20 of 228 pages Item 4 Voting Securities and Principal Holders Thereof http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9</p> <p>The Board is governed by Article VII, 7.1 of MCG pages 28-29. Board ensures that all shareholders are treated equally with respect to their rights. http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>The Board is also governed by the Company’s Articles of Incorporation Article VII Par A.1, 2 & 3 pages 10-14.: http://benguetcorp.com/wp-content/uploads/2014/07/Jul-2016-Amended-BC-Articles-of-Incorporation.pdf</p>	
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			<p>The Board is also governed by the Company’s By-laws Article I Section 4, pages 3-4, under tab “About Us”: http://benguetcorp.com/wp-content/uploads/2020/01/Jan-2020_Amended-Bylaws.pdf</p>	
3	Board has an effective, secure, and efficient voting system.	Compliant	<p>Provide link to voting procedure. Indicate if voting is by poll or show of hands.</p> <p>The Board has an effective, secure, and efficient voting system. Please refer to SEC Form 20-IS of 2021 pages 52-53 of 228 pages Item 19 on Voting Procedures posted in BC website under company disclosures SEC Filings Definitive Information Statement and in PSE Edge Portal announce date Oct 13, 2021 http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9</p>	
4	Board has an effective shareholder voting mechanisms such as supermajority or “majority of minority” requirements to protect minority shareholders against actions of controlling shareholders.	Compliant	<p>Provide information on shareholder voting mechanisms such as supermajority or “majority of minority”, if any.</p> <p>BC’s Board ensures the protection of minority shareholders. Please refer to Article II, Sec. 6 on Cumulative voting of Amended By-Laws, page 11. http://benguetcorp.com/wp-content/uploads/2020/01/Jan-2020_Amended-Bylaws.pdf</p> <p>Also pls see Cumulative Voting Rights on page 16 of 228 pages of SEC 20-IS of 2021 posted in BC website under company disclosures SEC Filings Definitive Information Statement and in PSE Edge Portal announce date Oct 13, 2021 http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9</p>	

5	Board allows shareholders to call a special shareholders' meeting and submit a proposal for consideration or agenda item at the AGM or special meeting.	Compliant	<p>Provide information on how this was allowed by board (i.e., minutes of meeting, board resolution)</p> <p>The minority shareholders shall have the right to propose the holding of a meeting, and the right to propose items in the agenda of the meeting, provided the items are for legitimate business purposes. Please refer to MCG, Art. VII 7.1 (III) page 29 : http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>For Calendar Year 2021, no proposal was received from the stockholders.</p>	
6	Board clearly articulates and enforces policies with respect to treatment of minority stockholders.	Compliant	<p>Provide information or link/reference to the policies on treatment of minority shareholders</p> <p>BC Board clearly articulates and enforces policies with respect to treatment of minority shareholders.</p> <p>Please refer to MCG, Art. VII, 7.1 pages 28-32 http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p>	
7	Company has a transparent and specific dividend policy,	Compliant	<p>Provide information on or link/reference to the company's dividend Policy. Indicate if company declared dividends. If yes, indicate the number of days within which the dividends were paid after declaration. In case the company has offered scrip-dividends, indicate if the company paid the dividends within 60 days from declaration</p> <p>The Company has not declared any dividends in the 2 most recent fiscal years 2021 and 2020 due to restrictions provided for in the Company's loan agreements with creditor banks. Pls see page 20 of 439 pages paragraph on Dividends SEC 17-A 2021 Annual Report posted in BC website and in PSE Edge Portal under Company Disclosures Annual Report announce date May 16, 2022</p>	

			http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f Please refer to guidelines on dividend rights and restrictions provided in Amended Articles of Incorporation, Art VIII, 7.A.3(a) page 14 http://benguetcorp.com/wp-content/uploads/2014/07/Jul-2016-Amended-BC-Articles-of-Incorporation.pdf Pls refer also to MCG Art VII 7.1 (vii) page 30 Right to Dividends http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf	
Optional: Recommendation 13.1				
1	Company appoints an independent party to count and/or validate the votes at the Annual Shareholders' Meeting.		Identify the independent party that counted/validated the votes at the ASM, if any.	
Recommendation 13.2				
1	Board encourages active shareholder participation by sending the Notice of Annual and Special Shareholders' Meeting with sufficient and relevant information at least 28 days before the meeting.	Compliant.	Indicate the number of days before the annual stockholders' meeting or special stockholders' meeting when the notice and agenda were sent out. Indicate whether shareholders' approval of remuneration or any changes therein were included in the agenda of the meeting. Provide link to the Agenda included in the company's Information Statement (SEC Form 20-IS) BC sent the Notice of Annual Shareholders' Meeting to shareholders on October 11, 2021, 30 days before the Annual Stockholders' Meeting on November 10, 2021. Pls see page 2 of ASM Minutes of Nov 10, 2021 posted in BC website http://benguetcorp.com/wp-content/uploads/2022/05/Minutes-of-10-November-2021-ASM.pdf	

			<p>ASM Agenda is included in the Info Statement. Pls refer to page 2 of 228 pages of DIS in PSE Edge Portal announce date Oct 11, 2021 and posted in BC website https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9</p> <p>http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf</p> <p>The Company follows its By-Laws provision of sending out notice of meeting, proxy form and copy of Annual Report to the shareholders at least 30 days before the date of the meeting. Pls refer to Sec 3 pages 12-13 of 30 pp of BC amended By-Laws. http://benguetcorp.com/wp-content/uploads/2020/01/Jan-2020_Amended-Bylaws.pdf</p>	
Supplemental to Recommendation 13.2				
1	Company's Notice of Annual Stockholders' Meeting contains the following information:	Compliant	<p>Provide link or reference to the company's notice of Annual Shareholders' Meeting</p> <p>Pls refer to Company Disclosures posted in BC website under tab Notice of annual or special stockholders meetings http://benguetcorp.com/company-disclosures/notice-of-annual-or-special-stockholders-meetings/</p> <p>Also under Company Disclosures SEC 20-IS 2021 Definitive Information Statement pages 5-6 of 228 pp posted in BC website and in PSE Edge Portal Information Statement announce date Oct 13, 2021 http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9</p>	
	a. The profiles of directors (i.e., age, academic	Compliant		

	<p>qualifications, date of first appointment, experience, and directorships in other listed companies)</p> <p>b. Auditors seeking appointment/re-appointment</p> <p>c. Proxy documents</p>	<p>Compliant</p> <p>Compliant</p>	<p>Pls see pages 11-14 of 228 pages under Company Disclosures SEC 20-IS Definitive Information Statement posted in BC website and in PSE Edge Portal Information Statement announce date Oct 13, 2021 http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9</p> <p>Pls see pages 38-39 of 228 pages under Company Disclosures SEC 20-IS Definitive Information Statement posted in BC website and in PSE Edge Portal Information Statement announce date Oct 13, 2021 http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9</p> <p>Pls see pp 11-12 of 228 pp of SEC 20-IS Definitive Info Statement posted in BC website and in PSE Edge Portal Info Statement announce date Oct 13, 2021 http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9</p>	
	<p>Optional: Recommendation 13.2</p>			
<p>1</p>	<p>Company provides rationale for the agenda items for the annual stockholders meeting</p>	<p>Compliant</p>	<p>Provide link or reference to the rationale for the agenda items</p> <p>BC provides the explanation for the agenda items for the ASM. Pls see AGENDA pages 7-10 of 228 pages of Definitive Information Statement under Company Disclosures SEC 20-IS posted in BC</p>	

			<p>website and in PSE Edge Portal Information Statement announce date Oct 13, 2021</p> <p>http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9</p>	
	Recommendation 13.3			
1	<p>Board encourages active shareholder participation by making the result of the votes taken during the most recent Annual or Special Shareholders' Meeting publicly available the next working day.</p>	Compliant	<p>Provide information or reference to a document containing information on all relevant questions raised and answers during the ASM and special meeting and the results of the vote taken during the most recent ASM/SSM.</p> <p>The voting results are posted on the website on the following day of the ASM. Pls refer to Company Disclosure on the Results of Nov 10, 2021 Annual Stockholders' Meeting, pages 4-8 of 9 pages showing the tabulation of votes posted in the company's website and in PSE Edge Portal under Company Disclosures template Results of Annual or Special Stockholders Meeting announce date Nov 11, 2021</p> <p>http://benguetcorp.com/wp-content/uploads/2021/11/Results-of-Nov-10-2021-ASM-and-Org-Mtg-of-BOD.pdf</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=1a4e2a01194ddf045d542af6f1e997b9</p>	
2	<p>Minutes of the Annual and Special Shareholders' Meeting were available on the company website within five business days from the end of the meeting.</p>	Compliant	<p>Provide link to minutes of meeting in the company website. Indicate voting results for all agenda items, including the approving, dissenting and abstaining votes. Indicate also if the voting on resolutions was by poll. Include whether there was opportunity to ask question and the answers given, if any</p> <p>The Minutes of the Shareholders' Meeting were posted at the Company's website within 5 business days from the end of the meeting. The results of the annual meeting are immediately posted in BC website the following day after the ASM and in PSE Edge Portal</p>	

			<p>announce date Nov 11, 2021 under SEC 17-C. Pls refer to ASM minutes posted in BC website http://benguetcorp.com/wp-content/uploads/2022/05/Minutes-of-10-November-2021-ASM.pdf</p> <p>Results of ASM in BC website and in PSE Edge Portal http://benguetcorp.com/wp-content/uploads/2021/11/Results-of-Nov-10-2021-ASM-and-Org-Mtg-of-BOD.pdf</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=1a4e2a01194ddf045d542af6f1e997b9</p> <p>Stockholders were given the opportunity to participate and ask questions and concerns by submitting their questions online prior to the given deadline of November 3, 2021 after they have registered online as indicated in the Minutes of ASM held on Nov 10, 2021 page 1 http://benguetcorp.com/wp-content/uploads/2022/05/Minutes-of-10-November-2021-ASM.pdf</p>	
Supplement to Recommendation 13.3				
1	Board ensures the attendance of the external auditor and other relevant individuals to answer shareholders questions during the ASM and SSM.	Compliant	<p>Indicate if the external auditor and other relevant individuals were present during the ASM and/or special meeting</p> <p>Representatives of SGV are expected to be present at the Stockholders' meeting to respond to appropriate questions and they are given the opportunity to make a statement if they so desire. Pls refer to Item 7 page 38 of 228 pages Definitive Info Statement posted in BC website and in PSE Edge Portal Info Statement announce date Oct 13, 2021 http://benguetcorp.com/wp-content/uploads/2021/10/BC-Definitive-Information-Statement_ASM-10-Nov-2021-1.pdf</p> <p>https://edge.pse.com.ph/openDiscViewer.do?edge_no=349004eaae5260c45d542af6f1e997b9</p> <p>In the Nov 10, 2021 ASM virtual meeting, the SGV Partner-in-charge, Mr. Peter John R. Ventura, and other relevant individuals/directors</p>	

			and officers were present during the ASM. The Chairman of the meeting, Mr. Bernardo M. Villegas, introduced the Directors present virtually at the stockholders meeting. The shareholders were informed of the presence of the Company’s external auditor, SGV & Co., and the Company’s senior officers, including head of Internal Audit as well as representative/s from BC’s transfer agent, Stock Transfer Service, Inc.	
Recommendation 13.4				
1	Board makes available, at the option of a shareholder, an alternative dispute mechanism to resolve intra-corporate disputes in an amicable and effective manner.	Compliant	<p>Provide details of the alternative dispute resolution made available to resolve intracorporate disputes</p> <p>Please refer to Article VII, 7.7, page 31 of Manual on Corporate Governance which provides that the Board should make available, at the option of a shareholder, an alternative dispute mechanism to resolve intra-corporate disputes in an amicable and effective manner. Also provided as one of Board Responsibilities to establish and maintain an alternative dispute resolution system in the Company that can amicably settle conflicts or differences between the Company and its stockholders, and the Company and third parties, including the regulatory authorities – page 11, Article 3.8 A. k http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p>	
2	The alternative dispute mechanism is included in the company’s Manual on Corporate Governance.	Compliant	<p>Provide link/reference to where it is found in the Manual on Corporate Governance</p> <p>BC has an alternative dispute mechanism in place to resolve intra-corporate disputes in an amicable and effective manner that is included in its CG Manual. Please refer to Article VII, 7.7, page 31 of Manual on Corporate Governance which states “The Board should make available, at the option of a shareholder, an alternative dispute mechanism to resolve intra-corporate disputes in an amicable and effective manner.” http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p>	

Recommendation 13.5			
1	Board establishes an Investor Relations Office (IRO) to ensure constant engagement with its shareholders.	Compliant	<p>Disclose the contact details of the officer/office responsible for investor relations, such as:</p> <p>1. Name of the person 2. Telephone number 3. Fax number 4. E-mail address</p> <p>The officer that oversee the Company's Investor Relations Office is: Atty. Reynaldo P. Mendoza, Executive Vice President Telephone number: 7751-9137 / 8812-1380 Fax number: 88121359 E-mail address: admin@benguetcorp.com</p>
2	IRO is present at every shareholders' meeting.	Compliant	<p>Indicate if the IRO was present during the ASM.</p> <p>The IRO is always present at every Annual Shareholders' Meeting. For Nov 10, 2021 ASM, officer that oversees IRO, Atty Reynaldo Mendoza, attended in person at the meeting..</p>
Supplemental Recommendations to Principle 13			
1	Board avoids anti-takeover measures or similar devices that may entrench ineffective management or the existing controlling shareholder group.	Compliant	<p>Provide information on how anti-takeover measures or similar devices were avoided by the board, if any.</p> <p>BC's Board of Directors avoids anti-takeover measures or similar devices that may entrench ineffective management of the existing controlling shareholder group. The Company observes one year term for its directors. Stockholders are given the opportunity to nominate new candidates for directorship during the ASM. Pls see Article VII Shareholder's Rights and Protection of Minority Stockholders' Interest, par. 7.1 (i) of MCG http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>BC has no restrictions on the transferability of shares such as first refusal option etc.</p>
2	Company has at least thirty percent (30%) public float to	Compliant	<p>Indicate the company's public float.</p>

	increase liquidity in the market.		BC's public float is 45.45% as of Oct 12, 2021 and 45.89% as of Jan 6 2022. Please refer to PSE Edge Portal under Company Disclosures Public Ownership Report announce date Oct 7, 2021 and Jan 6, 2022 https://edge.pse.com.ph/openDiscViewer.do?edge_no=c90050e201c5c0495d542af6f1e997b9 https://edge.pse.com.ph/openDiscViewer.do?edge_no=f9c628625894846a3470cea4b051ca8f	
Optional: Principle 13				
1	Company has policies and practices to encourage shareholders to engage with the company beyond the Annual Stockholders' Meeting.		Disclose or provide link/reference to policies and practices to encourage shareholders' participation beyond ASM	
2	Company practices secure electronic voting in absentia at the Annual Shareholders' Meeting.		Disclose the process and procedure for secure electronic voting in absentia, if any.	
Principle 14: The rights of stakeholders established by law, by contractual relations and through voluntary commitments must be respected. Where stakeholders' rights and/or interests are at stake, stakeholders should have the opportunity to obtain prompt effective redress for the violation of their rights.				
Recommendation 14.1				
1	Board identifies the company's various stakeholders and promotes cooperation between them and the company in creating wealth, growth and sustainability.	Compliant	Identify the company's shareholder and provide information or reference to a document containing information on the company's policies and programs for its stakeholders. Please refer to Article III, 3.8 (e) page 10 of MCG http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf	
Recommendation 14.2				
1	Board establishes clear policies and programs to provide a mechanism on the	Compliant	Identify policies and programs for the protection and fair treatment of company's stakeholders	

	fair treatment and protection of stakeholders.		The Board has clear policies and programs to provide a mechanism on the fair treatment and protection of stakeholders. Please refer to MCG, Article VII, 7.1 (v) page 29 on Power of Inspection, 7.1 (vi) on Right to Information, 7.1, (vi) Appraisal Right and 7.1 (viii) pages 29-30 http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf	
Recommendation 14.3				
1	Board adopts a transparent framework and process that allow stakeholders to communicate with the company and to obtain redress for the violation of their rights.	Compliant	<p>Provide the contact details (i.e., name of contact person, dedicated phone number or e-mail address, etc.) which stakeholders can use to voice their concerns and/or complaints for possible violation of their rights.</p> <p>Provide information on whistleblowing policy, practices and procedures for stakeholders</p> <p>Stakeholders can communicate (letter or e-mail) their concerns and/or complaints of possible violation of their rights to: Stockholders Relations Office – Ms. Eden M. Barcelona or Atty. Sheila Cenit-Belgica Telephone no.: 7751-9137 / 8812-1380 Email: admin@benguetcorp.com; or ebarcelona@benguetcorp.com / scenit@benguetcorp.com</p> <p>Please refer to Anti Fraud, Corruption and Whistleblowing policy posted in BC website, pages 8-10 on Whistleblowing Program. http://benguetcorp.com/wp-content/uploads/2020/06/anti-fraud-corruption-whistleblowing-policy.pdf</p>	
Supplement to Recommendation 14.3				
1	Company establishes an alternative dispute resolution system so that conflicts and differences with key stakeholders is settled in a fair and expeditious manner.	Compliant	<p>Provide information on the alternative dispute resolution system established by the company.</p> <p>BC has an alternative dispute mechanism in place to resolve intra-corporate disputes in an amicable and effective manner.</p> <p>Please refer to Article VII 7.7 page 31 of MCG</p>	

			http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf	
Additional Recommendations to Principle 14				
1	Company does not seek any exemption from the application of a law, rule or regulation especially when it refers to a corporate governance issue. If an exemption was sought, the company discloses the reason for such action as well presents the specific steps being taken to finally comply with the applicable law, rule or regulation.	Compliant	<p>Disclose any requests for exemption by the company and the reason for the request.</p> <p>No such requests for exemption were sought by the Company for the period covered in this report.</p>	
2	Company respects intellectual property rights.	Compliant	<p>Provide specific instances, if any.</p> <p>Intellectual Property rights are respected, particularly on the use of licensed hardware and software.</p> <p>Pls refer to one of the Secondary purposes page 8 of 44 pp of BC Amended Articles of Incorporation: “BC applies for, obtains, registers, purchases, leases, licenses or otherwise acquires, use, pledge, lease, sell, assign or otherwise dispose of formulas, secret processes, distinctive marks, improvements, processes, tradenames, trademarks, copyrights, patents, licenses, concessions and the like, whether used in connection with or secured under letters patent of or issued by any country or authority; and to issue, exercise, develop and grant licenses in respect thereof or otherwise turn the same to account.”</p> <p>http://benguetcorp.com/wp-content/uploads/2014/07/Jul-2016-Amended-BC-Articles-of-Incorporation.pdf</p>	
Optional: Principle 14				

1	Company discloses its policies and practices that address customer' welfare.		Identify policies, programs and practices that address customers' welfare or provide link/reference to a document containing the same.	
2	Company disclose its policies and practices that address supplier/contractor selection procedures.		Identify policies, programs and practices that address supplier/contractor selection procedures or provide link/reference to a document containing the same.	

Principle 15: A mechanism for employee participation should be developed to create a symbolic environment, realize the company's goals and participate in its corporate governance processes.

Recommendation 15.1

1	Board establishes policies, programs and procedures that encourages employees to actively participate in the realization of the company's goal and its governance.	Compliant	<p>Provide information on or link/reference to company policies, programs and procedures that encourage employee participation.</p> <p>Please refer to page 34 MCG Annex "A" on Code of Ethics basic principle on the conduct of business towards employees which states that the Company shall endeavor to provide for participative element so that the knowledge, experience and creativity of all who work in the company may contribute to the decision-making process. http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>Management encourages honest and open two-way communications at all levels of the corporate organization. This open two-way communications between management and employees is maintained at all times such that management conducts regular townhalls, weekly updates, performance feedback and grievance mechanisms.</p> <p>Pls refer to attached Annex "U" - HR Program for active participation of employees</p>	
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Supplement to Recommendation 15.1

1	Company has a reward/compensation policy that accounts for the performance of the	Compliant	Disclose if company has in place a merit-based performance incentive mechanism such as an employee stock option plan (ESOP) or any such scheme that awards and incentivizes employees, at the same time aligns their interests with those of the shareholders.	
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<p>company beyond short-term financial measures.</p>		<p>The Company rewards and recognizes outstanding performance and/or promotions to employees who exerted exceptional efforts in the attainment of the Company's plans and objectives. The Company provides compensation and benefits mandated by national labor laws and its own performance incentives program.</p> <p>On top of this, the following benefits are being extended to employees: (1) Birthday Leave – the Company provide a one day paid birthday leave which enables the employee to celebrate their natal day with love ones; (2) Vacation Leave - where an employee is entitled to 15-day Vacation Leave Pay for the number of days earned as vacation leaves in an amount equal to his/her Daily Basic Rate; (3) Sick Leave – an employee is entitled to a 15-day Sick Leave for the number of days earned as sick leave in an amount equal to Daily Basic Rate.</p> <p>Management is compliant with government mandated Special Leaves on top of the 15 days Sick Leave benefit as follows:</p> <ol style="list-style-type: none"> 1. Magna Carta for women (maximum of 2 months with pay) in accordance with the provisions of the Magna Carta for Women, to its female employees who have undergone treatment due to gynecological disorder. 2. Paternity Leave – Company grants Paternity Leave of seven days with full pay to all married male employees subject to implementing rules and regulations 3. Parental Leave (Solo Parent) – Provides additional Leave privileges of not more that 7 working days every year to a solo parent who has rendered at least one year of service based on the implementing rules and regulations <p>Aside for mandatory 13th month pay for the non-managerial (RF) employees, the Company gives Christmas Cash gifts to Managers and Consultants as approved by the Board of Directors.</p> <p>The Company provides Subsidy on Tuition Fees for dependents attending primary and secondary education equivalent to 80% of Basic Salary.</p>	
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		<p>Transportation and Travel Allowance is given to employees who are residing outside the camp site.</p> <p>Free housing with free electricity, water, waste disposal services are provided for employees accommodated in the mine sites.</p> <p>The Company has Keyman and Personal Accident insurance coverage for officers and Group Life and Personal Accident insurance coverage for managers and rank-and-file.</p> <p>The Company provides assistance for Board Review. Oath Taking and annual registration fees. – The Company grants assistance to employees taking the board/bar examination and subsidizes annual registration fee of its professional employees.</p> <p>The Company also provides De Minimis benefit to the employees such as (1) Basic and Major Medical Benefits – It is the policy of the Company to ensure the physical well being of its employees by providing them with medical, dental and hospitalization benefits; (2) Medicine Allowance – to cover medicines not covered by Philhealth; (3) Meal Subsidy – for Managerial employees who are residing outside the camp site and (4) Loyalty Awards – cash gift given to employees as token of Management’s gratitude for their continuous service to the company. This has been a practice to recognize the invaluable service and loyalty of the employees.</p> <p>In addition to above benefits, BC has existing Employee Stock Option Plan (ESOP), the objective of which is to provide the employees, directors, and consultants greater incentive to promote the business interest of the Company and instill loyalty. Pls refer to pages 40-43 of 439 pages of SEC 17-A 2021 Annual Report posted in BC website under Company Disclosures and in PSE Edge Portal Company Disclosures Annual Report announce date May 16, 2022 http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p>	
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			Pls refer to attached VL/SL Policy/Birthday Leave memo (Annexes “V” and “V-1”)	
2	Company has policies and practices on health, safety and welfare of its employees.	Compliant	<p>Disclose and provide information on policies and practices on health, safety and welfare of employees. Include statistics and data, if any.</p> <p>The individual health and well being of BC employees’ matter. The Company wants each employee to lead a happy and fulfilling personal and professional life. Management supports the health and well-being of BC staff through a variety of initiatives that will help BC personnel maintain and improve their health while working. For the period January to December 2021, pls refer to attached Annex “V” on Safety Program, Health and Well-Being initiated by management.</p> <p>The BC health strategy consisted of three core components: 1. Information 2. Prevention 3. Intervention</p> <p>1) This is information and educational campaign, where employees are taught self-awareness about their physical and psychological health wellbeing.</p> <p>2) Prevention Programs – BC initiates programs that aim to promote the healthy lifestyle of employees and continuously monitor status of their well-being such as:</p> <ul style="list-style-type: none"> - Conduct of Annual Physical Examinations of employees to monitor their fitness and manage health risks including occupational safety exposure. - Annual Flu vaccinations for employees - Vacation Leave with Pay provided to employees for leisure and rest to help them avoid and manage stress related illnesses which is part of the Company’s Mental Health Framework. <p>3) Intervention - The Company provides medical benefits (i.e. hospitalization, diagnostic examination and medicines) to assist</p>	

			<p>employees who have illnesses until they recover and able to return to work.</p> <p>Please refer to Policies posted in website under tab Corp Governance- > Policies on Health and Safety and Welfare/Social Development http://benguetcorp.com/corporate-governance/policies/</p> <p>In addition to above policies on health, basic and major medical benefits are given to all regular employees to assist in their medical expenses and needs. The Company also conducts Annual Physical Examination among all employees and conducts Health Talks on Nutrition. Pls see pages 502-503 of 439 pages - (2021 Certificate of Approval of Annual Safety and Health Program [ASHP]) Appendix "M"; pages 242-243 of 439 pages - Memos on Health Protocols; Appendix "L"; and pages 240-241 - Memo on COVID 19 Immunization Program Appendix "N" of Sustainability Report, Annex 'A' of 2021 Annual Report posted in BC website consisting of 439 pages and in PSE Edge Portal under Company Disclosures Annual Report (SEC 17-A) announce date May 16, 2022 http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p> <p>BC complies with the standards on occupational safety and health issued by DOLE. The Company also adopts practices and implements policies and programs related to occupational safety and health. Pls refer to attached DOLE Certificate of Compliance for 2021. (Annex "X").</p> <p>The Company aims to provide a safe and healthy workplace and eliminate work-related injuries and illnesses. The total injury frequency rate for CHQ is zero.</p>	
3	Company has policies and practices on training and	Compliant	Please refer to Policies posted in website under tab Corp Governance- > Policies	


	development of its employees.		http://benguetcorp.com/wp-content/uploads/2018/05/TRAINING-POLICY.pdf Management continues to provide training and development to its employees to keep them abreast with updates on new Government Regulatory Agencies regulations and enhancement of their professional skills for them to contribute to the achievement of company goals and objectives. Pls see attached list of 2021 training programs provided to employees (Annex “U”)	
Recommendation 15.2				
1	Board sets the tone and makes a stand against corrupt practices by adopting an anti-corruption policy and program in its Code of Conduct.	Compliant	<p>Identify or provide link/reference to the Company policy and procedures on penalizing employees involved in corrupt practices. Include any finding of violations of the company policy.</p> <p>Pls refer to Code of Employee Conduct and Discipline Offense #47 Page 8 of 12pp posted in BC website. Also indicated on pp 4-8 are procedures/disciplinary measures on penalizing employees involved in corrupt practices. http://benguetcorp.com/wp-content/uploads/2018/05/ECD%20with%20ee%20acknowledgement.pdf Also pls refer to Code of Conduct of Business and Ethics http://benguetcorp.com/wp-content/uploads/2020/06/E.-Code-of-Conduct-of-Business-and-Ethics.pdf</p> <p>Please refer to Anti-Fraud, Corruption and Whistleblowing Policy http://benguetcorp.com/wp-content/uploads/2020/06/anti-fraud-corruption-whistleblowing-policy.pdf</p> <p>Please refer also to Conflict of Interest Policy posted in BC website http://benguetcorp.com/wp-content/uploads/2019/05/Conflict-of-Interest.pdf</p> <p>The company is guided by the BC Code of Employee Conduct and Discipline (ECD) in dealing with its erring employees. For 2021, after due process, nine (9) and six (6) personnel were terminated and</p>	

			suspended, respectively. The termination basis was highgrading (8 cases) and an Absence Without Official Leave (AWOL). Likewise, the suspensions were due to negligence at work, insubordination, alleged highgrading, under the influence of prohibited drugs, violation of company Safety Policy, and using foul language against a co-employee.	
2	Board disseminates the policy and program to employee across the organization through trainings to imbed them in the company's culture.	Compliant	<p>Identify how the board disseminated the policy and program to employees across the organization</p> <p>The Board, through the Human Resources office, puts emphasis on integrity as part of BC's employees' core values. This is part of the orientation program of new employees. In addition, each employee is mandated to submit a disclosure of possible conflicts of interest on an annual basis. The anti-fraud, corruption and whistleblowing programs and procedures are likewise available on the BC website under tab Corporate Governance. The Company disseminated the policies and programs to employees throughout the organization via emails and by way of acknowledgement signed by employees. Pls refer to Code of Employee Conduct and Discipline posted in BC website.</p>	
Supplement to Recommendation 15.2				
1	Company has clear and stringent policies and procedures on curbing and penalizing employee involvement in offering, paying and receiving bribes.	Compliant	<p>Identify or provide link/reference to the company policy and procedures on penalizing employees involved in corrupt practices. Include any finding of violations of the company policy.</p> <p>Pls refer to Code of Employee Conduct and Discipline Offense #47 Page 8 of 12 pages http://benguetcorp.com/wp-content/uploads/2020/09/2019-EMPLOYEE-CODE-OF-CONDUCT.pdf http://benguetcorp.com/wp-content/uploads/2018/05/ECD%20with%20ee%20acknowledgement</p>	
Recommendation 15.3				

1	Board established a suitable framework for whistleblowing that allows employees to freely communicate their concerns about illegal or unethical practices, without fear or retaliation.	Compliant	<p>Disclose or provide link/reference to the company whistleblowing policy and procedure for employees. Indicate if the framework includes procedures to protect the employees from retaliation. Provide contact details to report any illegal or unethical behavior.</p> <p>Please refer to pp 8-11 of Anti-Fraud, Corruption and Whistleblowing policy under tab Corporate Governance -> Policies http://benguetcorp.com/wp-content/uploads/2020/06/anti-fraud-corruption-whistleblowing-policy.pdf</p> <p>Pls see pars #20, 21, 22 on right of whistleblower to protection against retaliation, par. #13-14 on procedures and par. 12 on Communication Channel/contact details. http://benguetcorp.com/wp-content/uploads/2020/06/anti-fraud-corruption-whistleblowing-policy.pdf</p>	
2	Board establishes a suitable framework for whistleblowing that allows employees to have Direct access to an independent member of the Board or a unit created to handle whistleblowing concerns.	Compliant	<p>Pls refer to responses on Recommendation 15.3, Item 1 above.</p> <p>Please refer also to MCG page 16 Article IV, 4.3(d) http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p>	
3	Board supervises and ensures the enforcement of the whistleblowing framework.	Compliant	<p>Provide information on how the board supervised and ensured enforcement of the whistleblowing framework, including any incident of whistleblowing.</p> <p>Please refer to Article IV, 4.3(d) of MCG page 16 http://benguetcorp.com/wp-content/uploads/2014/07/2017-MANUAL-ON-CORPORATE-GOVERNANCE.pdf</p> <p>The Internal Audit Office has full and free access to Senior Management and direct reporting line to the Audit Committee of the</p>	

			<p>Board. (page 1, par. III (1) of Internal Audit Charter posted in BC website) http://benguetcorp.com/wp-content/uploads/2020/06/O.-BC-Internal-Audit-Charter.pdf</p> <p>For 2021, BC has no incident of whistleblowing.</p>	
Principle 16: The company should be socially responsible in all its dealing with the communities where it operates. It should ensure that its interactions serve its environment and stakeholders in a positive and progressive manner that is fully supportive of its comprehensive and balanced development.				
Recommendation 16.1				
1	Company recognizes and places importance on the interdependence between business and society, and promotes a mutually beneficial relationship that allows the company to grow its business, while contributing to the advancement of the society where it operates.	Compliant	<p>Provide information or reference to a document containing information on the company’s community involvement and environment-related programs.</p> <p>Pls refer to PSE Edge Portal Company Disclosures SEC 17-A 2021 Annual Report announce date May 16, 2022 with attached SUSTAINABILITY REPORT Appendix “O” (pp. 246-247 of 439 pages posted in BC website and disclosed in PSE Edge Portal on Company’s Certificate of Approval of 2021 Social Development and Management Program (ASDMP) community involvement and environment-related programs. http://benguetcorp.com/wp-content/uploads/2022/05/2021-BC-Annual-Report.pdf https://edge.pse.com.ph/openDiscViewer.do?edge_no=07463139987967cf3470cea4b051ca8f</p>	
Optional: Principle 16				
1	Company ensures that its value chain is environmentally friendly or is consistent with promoting sustainable development.		<p>Identify or provide link/reference to policies, programs and practices to ensure that its value chain is environmentally friendly or is consistent with promoting sustainable development.</p>	
2	Company exerts effort to interact positively with the communities in which it operates.		<p>Identify or provide link/reference to policies, programs and practices to interact positively with the communities in which it operates.</p>	

Pursuant to the requirement of the Securities and Exchange Commission, this Integrated Annual Corporate Governance Report is signed on behalf of the registrant by the undersigned, thereunto duly authorized, in the City of Makati on MAY 30 2022, 2022.


BERNARDO M. VILLEGAS
 Chairman / Independent Director



LINA G. FERNANDEZ
 President



MAX D. ARCEÑO
 Compliance Officer for Corporate Governance

SIGNATURE


REGINALD S. VELASCO
 Independent Director


REYNALDO P. MENDOZA
 Executive Vice President-Legal &
 Assistant Corporate Secretary


RHODORA L. DAPULA
 Independent Director

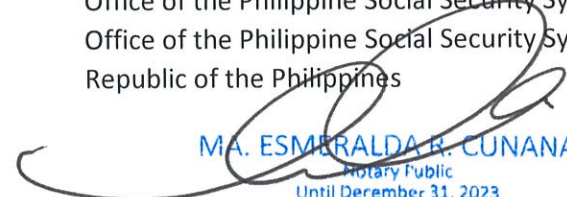

HERMOGENE H. REAL
 Corporate Secretary

Republic of the Philippines)
 City of Makati) S.S.

SUBSCRIBED AND SWORN to before me this MAY 30 2022, affiants exhibiting to me their competent proof of identification with details appearing opposite their respective names, as follows:

<u>Name</u>	<u>ID Number</u>	<u>Date/Place of Issue</u>
BERNARDO M. VILLEGAS	SSS No. 03-1245504-2	Office of the Philippine Social Security System (SSS)
REGINALD S. VELASCO	Driver's License #XOI-70-014725	Land Transportation Office Philippines; Expiry Sept 7, 2023
RHODORA L. DAPULA	PRC ID No. 0001110	PRC Manila; Expiry December 3, 2023
REYNALDO P. MENDOZA	SSS No. 03-3865936-9	Office of the Philippine Social Security System (SSS)
LINA G. FERNANDEZ	SSS No. 03-7537025-8	Office of the Philippine Social Security System (SSS)
HERMOGENE H. REAL	SSS No. 03-3235876-3	Office of the Philippine Social Security System (SSS)
MAX D. ARCEÑO	UMID No. 0003-8205668-8	Republic of the Philippines

Doc. No. 304 ;
 Page No. 62 ;
 Book No. XVIII ;
 Series of 2022.


MA. ESMERALDA R. CUNANAN
 Notary Public
 Until December 31, 2023
 Appt. No. M-002 (2022-2023) Attorney's Roll No. 34567
 MCLC Compliance No. VII-0004035/7-19-2021
 PTR No. 8852113/1-3-2023/Makati City
 IBP Lifetime Member Roll No. 05413
 @ground level, Bella Plaza, Baywalk I
 Dela Rosa St. Legaspi Village,
 Makati City

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I-ACGR LIST OF ANNEXES

- A - Type of Directorship
- B - 2021 Corporate Secretary's Certificate of Attendance in Training on Corporate Governance
- B-1 - 2021 Program/topics on Corporate Governance seminar and number of hours
- C - Chief Compliance Officer 2021 Certificate of Attendance in Training on Corporate Governance
- D - Certification of the President/EVP on the OPCOM/MANCOM meetings held in 2021
- E - Chief Audit/Internal Audit Head qualifications
- F - Performance Evaluation of Officers/Managers
- G - Policy on Performance Assessment
- H - BROC Agenda – March 1, 2021
- H-1 - BROC Agenda – April 27, 2021
- I - Report of AuditCom to the Board of Directors
- J - Secretary's Certificate on Directors' participation in meetings
- K - Proof of sending advance materials to the BOD (emails sent to Directors)
- L - Update of Directorship in PLCs (BM Villegas, LIL Virata, Kyi Chan, JRE Paras, AM Te)
- M - Summary of Board self-assessments
- M-1 - Summary of Auditcom self-assessments
- M-2 - Summary of BROC self-assessments
- M-3 - Summary of Executive Committee self-assessments
- M-4 - Summary of Salary & Stock Option Committee self-assessment
- M-5 - Summary of Nominations and Election Committee self-assessment
- N - External Facilitator Certification dated on conduct and analysis of individual board and committees' self-assessment of its performance
- O - Code of Employee Conduct Discipline (ECD) acknowledgment of new hires in 2021
- P - CPBAC Guidelines/Procedures (Asset Recovery/Disposal)
- Q - Proof of MCG submission to SEC
- Q-1 - Proof of MCG submission to PSE
- R - Press Release distributed to media dated May 25, 2021 on consolidated income in 2020
- R-1 - Press Release distributed to media dated June 1, 2021 on First Quarter Results

- R-2 - Press Release distributed to media dated June 16, 2021 on the appointment of new director of BC's wholly-owned subsidiary, Benguetcorp Nickel Mines, Inc.
- R-3 - Press Release distributed to media dated August 20, 2021 on 2021 First Half Results
- S - Internal Audit's Accomplishments in 2021

- T - Attestation of President, Exec. Vice President and Internal Audit Head
- U - HR Program for active participation of employees
- V - List of Training/Safety Programs provided to employees

- W - VL and SL Policy
- W-1 - Birthday Leave Policy

- X - DOLE Certificate of BC Compliance on Occupational Safety and Health

Board of Directors

Number of Directors per Articles of Incorporation	11
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Actual number of Directors for the year	11
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Composition of the Board

Director's Name	Type [Executive (ED), Non-Executive (NED) or Independent Director (ID)]	Nominator in the last election (if ID, state the relationship with the nominator)	Date first elected	Date last elected/appointed (if ID, state the number of years served as ID)	Elected when (Annual /Special Meeting)	No. of years served as director (as of Dec 31, 2021)
Bernardo M. Villegas	ID	Shirley S. Cueva – no relation	Jun 25, 1998	Nov 10, 2021 and since 2002 as ID	N/A*	23 years
Maria Remedios R. Pompidou	NED	-	Oct 25, 2000	Nov 10, 2021	N/A*	21 years
Luis Juan L. Virata	NED	-	Aug 8, 1995	Nov 10, 2021	N/A*	26 years
Jose Raulito E. Paras	NED	-	Aug 16, 2018	Nov 10, 2021	N/A*	3 years
Rhodora L. Dapula	ID	Miriam Nacario-San Pedro-no relation	Aug 16, 2018	Nov 10, 2021 and since Aug 16, 2018 as ID	N/A*	3 years
Reginald S. Velasco	ID	Rebecca R. Rapisura-no relation	Aug 16, 2018	Nov 10, 2021 and since Aug 16, 2018 as ID	N/A*	3 years
Jesse Hermogenes T. Andres	NED	-	Aug 16, 2018	Nov 10, 2021	N/A*	3 years
Andrew Patrick R Casiño	NED	-	Jun 4, 2020	Nov 10, 2021	N/A*	1 year and 6 months
Anthony M. Te	NED	-	Sep 25, 2020	Nov 10, 2021	N/A*	1 year and 3 months
Kwok Yam Ian Chan	NED	-	Sep 25, 2020	Nov 10, 2021	N/A*	1 year and 3 months
Lina G. Fernandez	ED	-	Mar 18, 2021	Nov 10, 2021	N/A*	9 months

(*) From 1995 to 2021, the Annual Stockholders' Meetings were held but no election of directors was conducted because the 1993 TRO issued by the Supreme Court enjoining the election of directors remained in force. Thus, the incumbent directors of the Company continue to remain in office on holdover capacity until their successors are elected and qualified.



CENTER FOR TRAINING
AND DEVELOPMENT, INC.

This

Certificate of Attendance

is hereby presented to

Hermogene H. Real

for actively participating in The 2021 Benguet Corporation
Corporate Governance Seminar with the theme:

*"Embracing Good Corporate Governance for Effective
and Efficient Management"*

Held on the 12th day of November 2021,
9:00 a.m.-1:00 p.m., via Zoom Online

ATTY. ROSARIO S. BERNALDO, CPA, MBA
Director



**CENTER FOR TRAINING AND
DEVELOPMENT INC.**

**BENGUET CORORATION
CORPORATE GOVERNANCE SEMINAR 2021**

November 12, 2021, 9:00am-1:00pm

PROGRAM

	TIME	ACTIVITY	SPEAKER
I.	9:00 A.M.-9:10 A.M.	Registration	
II.	9:10 A.M. – 9:55 A.M.	Updates on SEC Issuances	Ms. Jennilyn R. Sio, CPA
III.	9:55 A.M. – 10:00 A.M.	Open Forum	
IV.	10:00 A.M. – 10:40 A.M.	Compliance with DOLE Regulations During the Pandemic	Atty. Danilo C. Cunanan, CPA
V.	10:40 A.M. – 11:55 A.M.	CREATE Law	Atty. Rosario S. Bernaldo, CPA, MBA
VI.	11:55 A.M. – 12:05 P.M.	Open Forum	
VII.	12:05 P.M. – 12:55 P.M.	Corporate Governance Updates	Atty. Rosario S. Bernaldo, CPA, MBA
VII	12:55 P.M. – 1:00 P.M.	Open Forum	



CENTER FOR TRAINING
AND DEVELOPMENT, INC.

This
Certificate of Attendance

is hereby presented to

Max D. Arceño

for actively participating in The 2021 Benguet Corporation
Corporate Governance Seminar with the theme:

*"Embracing Good Corporate Governance for Effective
and Efficient Management"*

Held on the 12th day of November 2021,
9:00 a.m.-1:00 p.m, via Zoom Online

ATTY. ROSARIO S. BERNALDO, CPA, MBA
Director



BenguetCorp

CERTIFICATION

WE, LINA G. FERNANDEZ and REYNALDO P. MENDOZA, both of legal age, Filipino and with office address at the 7F Universal Re Building, 106 Paseo de Roxas, Makati City, after having been duly sworn in accordance with law, hereby state that:

1. We are the respective President and Executive Vice President of **BENGUET CORPORATION**, a corporation duly organized and existing under Philippine law, with principal office address as above stated.

2. We certify that for the year 2021, the Company held regular management meetings on the following dates:

January 11, 2021	June 23, 2021
January 29, 2021	July 9, 2021
February 19, 2021	July 27, 2021
March 11, 2021	August 17, 2021
March 30, 2021	September 6, 2021
April 16, 2021	September 29, 2021
May 3, 2021	October 26, 2021
May 18, 2021	November 17, 2021
June 4, 2021	December 7, 2021

3. We are issuing this Certification to attest to the truth of the foregoing and for all legal purposes that this may serve.

Issued this ~~MAY 30 2022~~ MAY 30 2022 day of May 2022 at Makati City.

LINA G. FERNANDEZ
President

REYNALDO P. MENDOZA
Executive Vice President

MAY 30 2022

SUBSCRIBED AND SWORN to before me this ___ day of May 2022 at Makati City, affiants exhibited to me their valid competent SSS I.D.s as follows:

NAME	SSS I.D. No.	Issued in
LINA G. FERNANDEZ	03-7537025-8	Republic of the Philippines
REYNALDO P. MENDOZA	03-3865936-9	Republic of the Philippines

Doc No. 272 :
Page No. 50 :
Book No. XVIII :
Series of 2022.

MA. ESMERALDA R. CUNANAN

Notary Public

Until December 31, 2023

Appt No M-002 (2022-2023) Attorney's Roll No 34562

MCLF Compliance No VII-0004035/7 19-2021

PTR No 8852113/1-3-2022/Makati City

IBP Lifetime Member Roll No 05413

Ground Level, Dela Rosa Carpark I

Deia Rcsa St Legaspi Village

Makati City



BenguetCorp

INTERNAL MEMORANDUM

DATE: 27 Oct 2020	FROM: HRA	TO: All Employees
SUBJECT: ANNOUNCEMENT		
CC: File		

The Company is pleased to announce the appointment of **MR. GLENN JOHN V. RARAS** as Internal Audit Head effective December 14, 2020.

Mr. Raras earned his Bachelor of Science in Accountancy degree from Mariano Marcos State University. He passed the Certified Public Accountancy (CPA) licensure examination in 2009 and as Certified Internal Auditor (CIA) in 2011. Currently, he is completing his Master in Management at the University of the Philippines-Baguio.

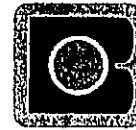
Prior to joining BC, he practised his profession and gained work experiences in accounting and auditing in various industries including insurance, banking and mining.

Let us all welcome Glenn to the BC family and extend our usual support to him.

A handwritten signature in black ink, appearing to read "LG Fernandez/RP Mendoza".

LG Fernandez/RP Mendoza
OIC-Presidents

BENGUET CORPORATION



**PERFORMANCE EVALUATION REPORT
(FOR MANAGERS/OFFICERS)**

NAME: _____ OPERATION UNIT/DIVISION _____
POSITION _____ FUNCTIONAL UNIT _____
EVALUATION PERIOD: FROM _____ TO _____ PE DUE DATE _____

1. What were the (3) most important objectives you set out to accomplish during the last six (6) months? Please restate these objectives and elaborate to which they were attained.

OBJECTIVES

RESULTS ACHIEVED

Rater's Comments

<p>5. Describe fully the effort you have made to develop your subordinates during this rating period. Specify projects, training programs, and all other means you have employed to develop them.</p> <p>6. Do you think the present responsibilities and/or challenges in your job are: a. below, b. equal, c. beyond your personal capabilities. Please explain.</p> <p>7. Do you think your present compensation package is fair considering you: a. job responsibilities, b. record of performance, and c. "market value" to other companies. If not, why?</p> <p>8. a. Outside your immediate area of responsibility indicate in order of importance whatever you think the company could do in a better way. b. Indicate any other comments, suggestions, complaints, etc. that you may have.</p>	<p>Rater's Comments</p>
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<p>9. Please check one word which you think will indicate how your overall performance during the last six (6) months should be rated.</p> <p>[] Unsatisfactory [] Average [] Good [] Very Good [] Outstanding</p>	<p>RATER'S COMMENTS</p>																																								
<p>ACKNOWLEDGEMENT OF PE INTERVIEW</p> <p>This is to acknowledge that this PE Report has been discussed with me by my Rater on _____ Rater's Signature: _____ Date PE was submitted by Rater _____</p>																																									
<p>TO BE ACCOMPLISHED BY THE RATER & INTERVIEWER (S)</p> <p>State your overall comments and recommendations. (Please specify if you recommend any increase in pay, if not explain why.)</p>																																									
<p>RATER:</p>																																									
<p>REVIEWER (S):</p>																																									
<p>SALARY ADJUSTMENT: (To be accomplished by HUMAN RESOURCES)</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 20%;"></th> <th style="width: 20%; text-align: center;">PRESENT</th> <th style="width: 20%; text-align: center;">PROPOSED</th> <th style="width: 20%; text-align: center;">CHANGE</th> </tr> </thead> <tbody> <tr> <td>BASIC PAY</td> <td style="text-align: center;">_____</td> <td style="text-align: center;">_____</td> <td style="text-align: center;">_____</td> </tr> <tr> <td>RA</td> <td style="text-align: center;">_____</td> <td style="text-align: center;">_____</td> <td style="text-align: center;">_____</td> </tr> <tr> <td>TNTA / HTA</td> <td style="text-align: center;">_____</td> <td style="text-align: center;">_____</td> <td style="text-align: center;">_____</td> </tr> <tr> <td>T O T A L</td> <td></td> <td></td> <td></td> </tr> <tr> <td>POSITION</td> <td style="text-align: center;">_____</td> <td style="text-align: center;">_____</td> <td></td> </tr> <tr> <td>EFFECTIVITY DATE</td> <td style="text-align: center;">_____</td> <td style="text-align: center;">_____</td> <td></td> </tr> </tbody> </table>		PRESENT	PROPOSED	CHANGE	BASIC PAY	_____	_____	_____	RA	_____	_____	_____	TNTA / HTA	_____	_____	_____	T O T A L				POSITION	_____	_____		EFFECTIVITY DATE	_____	_____		<p>APPROVED BY:</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%; text-align: center;">_____</td> <td style="width: 30%; text-align: center;">_____</td> </tr> <tr> <td style="text-align: center;">Gen. Mgr. / Vice-President</td> <td style="text-align: center;">Date</td> </tr> <tr> <td style="text-align: center;">_____</td> <td style="text-align: center;">_____</td> </tr> <tr> <td style="text-align: center;">Exec. Vice-President</td> <td style="text-align: center;">Date</td> </tr> <tr> <td style="text-align: center;">_____</td> <td style="text-align: center;">_____</td> </tr> <tr> <td style="text-align: center;">President</td> <td style="text-align: center;">Date</td> </tr> </table>	_____	_____	Gen. Mgr. / Vice-President	Date	_____	_____	Exec. Vice-President	Date	_____	_____	President	Date
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PERSONNEL POLICY MANUAL			
SUBJECT ADDENDUM TO POLICY ON PROMOTIONAL INCREASE	DATE OF ISSUE: JUNE 13, 1990	ORIGINATED BY: A. S. LAGDAMEO, JR.	POLICY NO.: 306a
	SUPERSEDES:	APPROVED BY: <i>[Signature]</i> 6/13/90 D.R. BELMONTE	PAGE NO.: 1 of 1

V. IMPLEMENTING GUIDELINES

1. A promotional increase will be determined using the manager's performance evaluation (PE) ratings obtained from two (2) successive six-month rating periods inclusive of the current rating period where promotion is being recommended.

Table of Promotional Increase

Previous PE Rating	Current PE Rating	Number of Pay Step
Good	Very Good	0.5
Very Good	Very Good	1.0
Good	Outstanding	1.0
Very Good	Outstanding	1.5
Outstanding	Very Good	1.5
Outstanding	Outstanding	2.0

2. A manager whose current PE rating is lower than Very Good, regardless of previous PE rating, should not yet be recommended for promotion.

[Signature]
A. S. LAGDAMEO, JR.



Benguet Corp

PERSONNEL POLICY MANUAL			
PROMOTIONAL INCREASE	DATE OF ISSUE:	ORIGINATED BY:	POLICY NO.:
	24 NOVEMBER 1989	<i>A. S. LAGDAMEO JR.</i> A. S. LAGDAMEO JR.	306
	SUPERSEDES:	APPROVED BY:	PAGE NO.:
	25 NOVEMBER 1987	<i>D. L. LAZARO</i> D. L. LAZARO	1 of 1

I. PURPOSE :

To clarify policy on promotional increase.

II. COVERAGE:

Assistant Unit Managers and up. The policy does not cover a rank and file employee being promoted to AUM level.

III. DEFINITION OF TERMS :

1. Promotion - is a change from one position to another in a higher pay class. It constitutes the highest form of rewarding Managers for consistently above average performance and is extended only to those who satisfactorily meet the minimum requirements of the higher position. It generally entails additional and/or more difficult duties and responsibilities.
2. Manager - refers to one occupying a position of Assistant Unit Manager level or higher.

IV. POLICY :

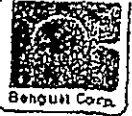
It shall be the policy of the Company to grant a promotional increase to a Manager who is being promoted to a higher pay level or pay class.

The promotional increase shall range from a minimum of one-half (1/2) step to a maximum of two (2) pay steps of the Manager's new position. The promotional increase shall be in addition to any merit increases, if any.

V. EFFECTIVITY DATE

This policy is effective 01 January 1990.

A. S. LAGDAMEO JR.
A. S. LAGDAMEO JR.



CORPORATE PERSONNEL POLICY MANUAL

Policy Manual No. 302

SUBJECT PERFORMANCE EVALUATION FOR MANAGERS AND SUPERVISORS	DATE OF ISSUE 04 June 1980	ORIGINATED BY F. A. PARAAN	Code: FAP-M-127-80
	SUPERSEDES	APPROVED BY J. V. ONGPIN	PAGE NO. 1 OF 11

As we have advised you earlier, the performance-evaluation procedure in the Company as it applies to managers and supervisors is in the process of revision. This is in line with the desire of Management to make the performance evaluation process at BENGUET CORPORATION a more effective instrument for enhancing individual performance, for planning training programs, and for salary administration purposes.

The revised Performance Evaluation form that will be adopted for all managers and supervisors in the Company is attached. This will be used effective June 1, 1980.

The Performance Evaluation is geared to achieve the following objectives:

1. To insure that the system of performance measurement is made particularly relevant to the employee's key responsibilities;
2. To incorporate in the appraisal system a mechanism for feedback to management, not only on the employee's attitudes and feelings but also for relaying suggestions for improvement;
3. To provide a formal document that will serve as guide for meaningful discussion of performance issues between the superior and his subordinates;
4. To use the appraisal system as a vehicle for pinpointing the training and development needs of the employee;
5. To train Managers and Supervisors in the formulation of, and measurement of performance against, objectives -- a skill of the effective executive.
6. To include in the appraisal system not only the element of incentives and awards but also of penalties and controls.

Each of the questions was included in the form for a definite reason. The questionnaire was not devised to make the evaluation process even more laborious but rather to obtain maximum benefit or use from the process.

CORPORATE PERSONNEL POLICY MANUAL

SUBJECT	DATE OF ISSUE	PAGE NO.
Performance Evaluation for Managers and Supervisors	04 June 1980	2 of 11

The following pages contain the rationale behind each question asked; the Rater as well as the employee being rated are well advised to read through them before using the forms.

QUESTION NO: 1

Did you attain the three (3) most important objectives you set out to accomplish during the last six (6) months? If yes, please elaborate as to what extent they were attained. If not, please explain why you have been unable to attain them. (For purposes of clarity, please restate these objectives.)

The employee is asked to make the list in order to focus (and refresh) his mind on the agreed-upon standards against which his performance will be evaluated. He should retain a copy and refer to the previous evaluation forms for reference.

He is then asked to explain to what extent each objective has been attained. Since the rewards/incentives system is built around performance versus objectives, it is only fair to allow the employee himself to point out his major accomplishments, performance beyond requirements, and the reasons for any negative deviation from expectations. Some of these information might well be unknown to the Rater.

Reasons may be varied, and these may include previous disagreements with the superior on work priorities and/or merits of an assignment. In some cases, the real reasons may not be those alleged. In any case it is best that these are identified and brought up for discussion.

Rater's Comments

The Rater should consider one objective at a time, and may agree or disagree with the employee's own assessment under each. If he disagrees, this affords him a chance to discuss the way he views the employee's accomplishments relative to an objective. The Rater should review the reasons given to justify negative deviations from expectations, and if he disagrees, he should point this out and discuss with the employee.

The Rater should also be alert to recognize performance well beyond expectations (i.e., positive deviation from standards) and to compliment the employee by way of asking his reasons for success.

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Performance Evaluation For Managers & Supervisors	04 June 1980	3 of 11

Sample Remarks From Performance Evaluation

Question No. 1

- Rater: 1. Some reports were wrong and jobs ^{due} should have spent more time checking these reports.
2. It is my belief that () has underestimated his three most important accomplishment which is my opinion are as follows
3. I'd like to see some figures to indicate why malaria is a problem in Coto.
4. I do not agree with the production figures stated here.

QUESTION NO. 2

Which do you consider as the three (3) most important objectives you aim to accomplish during the next six (6) months?

Try to be as specific as possible, and list objectives down in the order of their importance.

This question is asked to make sure the employee has a clear concept of his key responsibilities, and to give him an opportunity to think and assess which of these will have major impact or consequence to his unit over the next 6 months. He is then expected to suggest the 3 most important specific objectives for the forthcoming 6 months period. The accomplishment of these essential objectives are the standards against which his future performance will be evaluated.

Rater's Comments

The Rater's comments are particularly important if only to find out whether or not the superior and his subordinate have a clear agreement on what the latter's major performance objectives should be. Any discrepancy should be discussed and threshed out during the rating interviews.

If the case is such that there is really a significant difference, it is imperative that the subordinate is told at the outset of the most important responsibilities of his position, and the performance objectives he must strive to achieve from then on. (It is hard enough to measure performance even when both parties are well agreed upon on what have to be accomplished; it would be doubly harder if both have divergent expectations).

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Performance Evaluation for Managers & Supervisors	04 June 1980	4 of 11

The Rater should make sure that objectives set are phrased as statements of specific objectives (preferably quantifiable) rather than as responsibilities, duties, etc.

One other reason in having the Rater's comment is for top management to know whether or not the superior himself who is doing the rating has the correct understanding of what his unit's important objectives are through a reading of the individual objectives he assigned to his subordinates.

Sample Remarks From Performance Evaluation

Question No. 2

Rater: 1. A continuation of all the above-mentioned activities.
 Rater: 1. I see no reason why () can't get more specific about goals.

QUESTION NO. 3

Describe briefly any difficulties you have in the discharge of your duties. Indicate any specific knowledge or skills that you lack that are required in your present job.

The question really asks which aspects of the employee's job he has the greatest difficulty with. It may be due to problems associated with personality traits, in a particular skill, in a specialized knowledge or in a combination of these. It could also be due to a deficiency in the working system and/or environment.

The employee's answers to this question may also reveal whether or not the employee is overly concerned with an incidental weakness but ignores the essential ones.

Regarding Question No. 3, what can you or the company do to help overcome these difficulties? If the answer to number 3 is the same as in previous rating, indicate plans of action you have taken and the extent of your accomplishment to improve these weaknesses during the last rating period.

This question solicits the employee's suggestions for his improvement. With the help of the Company through training, seminars, improvement of systems and procedures, etc., a great deal can be done with problems associated with job skills, knowledge, work environment, etc.

Where the problems are associated with personality traits, it is more difficult to effect immediate improvements although recognizing the problems can lead to ultimate solutions or at least minimize aggravations.

CORPORATE PERSONNEL POLICY MANUAL

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Rater's Comments on (3) and (4)

The real purpose of asking the above question is to have a first hand basis for improvement efforts. It is, therefore, important that both the Rater and the employee secure agreements in this area so that any proposed effort for employee improvement can be addressed to the real, relevant deficiencies.

Sample Remarks from Performance EvaluationQuestions No. (3) and (4)

- Ratee:
1. To keep my men work with satisfaction especially with their salary. Young intelligent engineers could not stay long working only as a draftsman.
 2. As a supervisor, I expect from my subordinate, no less than a job efficiently and expeditiously done. But in the process I tend to overlook the human aspect involved.
 3. Weak in technical report writing.
 4. The company should raise the diamond driller rate equivalent to or maybe over the wages being offered by other mining companies in order to hire new qualified competent drillers to join us.

- Rater:
1. Needs more brushing up in Eng'g. and other aspects of his work.
 2. () is good but not inspiring leader. It would be good if we would strengthen leadership ability.
Should develop flexible approach. I recognize individual differences in character and response to various types of motivation.
 3. This is a common weakness among engineers.
 4. (.) in his comments missed the point of the question here.

CORPORATE PERSONNEL POLICY MANUAL

SUBJECT	DATE OF ISSUE	PAGE NO.
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QUESTION NO. 5

Describe fully the effort you have made to develop your subordinate during this rating period. Specify projects, training programs, and all other means you have employed to develop them.

Question No. 5 is on training needs. The purpose is to emphasize the importance of training and to drive home the point that it is primarily a line function.

QUESTION NO. 6

Do you think that the present responsibilities and/or challenges in your job are (a) below, (b) equal to, or (c) beyond your personal capabilities? Please explain.

This question is included to help determine if a particular employee is overqualified or underqualified for his present job and to assist in planning necessary adjustments in the future.

Rater's Comments

Many employees may be reluctant to admit that their present responsibilities are too much for them, and many others may well show ambition beyond their capabilities. The Rater should be careful to assess the reply to this question to make sure that it is realistic.

Sample remarks From Performance Evaluation

Question No. 6

Ratee: 1. The responsibilities and challenges in my job I believe is about equal to my capabilities because I optimistically look forward to any task that we may have at hand knowing that I have the operation of my men to put together.

2. Equal to my personal capabilities.

Rater: 1. () is capable of holding present responsibilities.

2. Would rate below because he has done his job very well even without an assistant for several years.

CORPORATE PERSONNEL POLICY MANUAL

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3. () is technically qualified for the job he holds. However, he lacks the drive, imagination, and openmindedness to try new ways of improving his operations and this is vital in his position.

QUESTION NO. 7

Do you think that your present compensation is fair, considering your (a) job responsibilities, (b) record of performance, and (c) "market value" to other companies? If not, why?

A negative answer to this question does not guarantee the employee of any adjustment. However, it will provide management with a better idea of how the individual employee feels subjectively about his present compensation and to take appropriate action whenever justified. A periodic compilation of the answers to this question is also useful to the Company in reviewing general levels of compensation in connection with salary surveys.

Sample Remarks From Performance Evaluation

Question No. 7

Ratee: 1. My present compensation in my belief could stand some more improvement based on performance as highlighted by the figures of our quarterly reports and job responsibilities.

Rater: 1. I do not agree with everything that () has said. His position can in no way be compared to a Mine Superintendent in other mines except for those operating on a shoestring.

2. () was recently given increase/promotion - June 1, 1980.

QUESTION NO. 8

Outside your immediate area of responsibility, indicate in order of importance whatever you think the Company should consider doing, but is not presently doing, or anything it is doing but could do in a better way.

This question gives the employee an opportunity to comment on activities and functions of other departments and those of the Company in general. Further, this is a form of soliciting ideas for making improvements in the organization as a whole.

CORPORATE PERSONNEL POLICY MANUAL

SUBJECT	DATE OF ISSUE	PAGE NO
Performance Evaluation For Managers & Supervisors	04 June 1980	8 of 11

Rater's Comments

Where the Rater is unsure how to react, he should refer the question to the Department/s concerned or to top management for clarification.

Sample Remarks from Performance Evaluation

Question No. 8

- Ratee:
1. Management should consider the 5-day-a-week work scheme for CHQ Office employees.
 2. The retirement plan is good. However, I feel retirement should be based on the number of years of service rather than the age of the employee.
 3. To include staff members in the proposed housing plan payable by installments by the employee.
 4. Should have a Research and Development Department.

- Rater:
1. Company has a set of priorities, right now the housing project is for the R & F. This I hope will be later expanded to include the staff.

QUESTION NO. 9

Indicate any other comments, suggestions, complaints, etc. you may have.

This is a catch-all device to enable the employee to express what he would want to that has not been explicitly asked elsewhere in the form.

Rater's Comments

Where the Rater is unsure how to react, he should refer the question to the department/s concerned or to top management for clarification.

Sample Remarks from Performance Evaluation

Question No. 9

- Ratee:
1. My suggestion for the improvement of the inter-relationship of Dept. Heads and other top supervisors for this company is to hold "Bull Sessions". This should narrow down the communication gaps, enable

CORPORATE PERSONNEL POLICY MANUAL

SUBJECT	DATE OF ISSUE	PAGE NO.
Performance Evaluation for Managers & Supervisors	04 June 1980	9 of 11

members to exchange ideas and thresh out differences before that become full blown dynamites and establish camaraderie among staff.

2. Provide medium priced housing projects for old and retired employees.
3. I would suggest revision of question #8. The rater should have the sole discretion and responsibility to judge the ratee's performance based on ratee's foregoing performance presentation. Besides question #8 is related to question #9 which only the rater is required to answer.
4. Pay scale of camp physicians is considered one of the lowest if not the lowest as compared to other departments. We consider our work equally important as that of other departments.

- Rater:
1. Must endeavor to give at least one suggestion next time.
 2. Can purchase unit for housing project prior to retirement and even after retirement, however, on a third priority basis.
 3. This is debatable as ours is a mining concern.

QUESTION NO. 10

Please check one word which you think will indicate how your overall performance during the period should be judged.

Outstanding - Very Good - Average - Unsatisfactory

The purpose of this question is to summarize the employee's over-all assessment of his performance based on his answers to Questions 1 & 3.

Rater's Comments

The Rater should point out specific reasons if he disagrees, preferably citing the employee's performance against pre-set objectives. (It is expected that disagreements will exist as to the validity of the reasons given for failing to accomplish previously agreed upon objectives.)

CORPORATE PERSONNEL POLICY MANUAL

SUBJECT Performance Evaluation For Managers & Supervisors	DATE OF ISSUE 04 June 1980	PAGE NO: <u>10</u> of <u>11</u>
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Sample Remarks From Performance Evaluation

Question No. 10

Rater: 1. I find the more senior men very unhappy about the choice of words in question #10.

TO BE ACCOMPLISHED BY RATER ONLY

- A. Would you consider the ratee with (a) exceptional, (b) above average (c) average, or (d) below average potential for promotion. How would you consider ratee's potential for promotional advancement?

The purpose of this question is to obtain a well thought out opinion as to the employee's promotional potential. The employee may not necessarily benefit immediately but this assessment will form the basis for future decisions involving promotions.

A "below average potential" rating should red-flag a need to look deeper into the reasons if not obvious from the answers and comments to other questions in the form.

- B. State your overall comments and recommendations. (Please specify if you recommend an increase in pay; if not explain why.)

This is where the Rater summarizes his overall assessment of the employee and recommends whether a salary adjustment or promotion is justified.

The Space provided for the date the performance evaluation with the employee has been specifically included to make sure that this evaluation is actually discussed by the Rater with the employee. Since the discussion aspect is one of the key elements in the entire performance evaluation process, none of the benefits would be derived if this is omitted.

In the rating forms, submission dates are emphasized and will thus make delays easily traceable.

Frequency of Evaluation

Junior Staff and Senior Staff are to be evaluated by their immediate superiors after the probationary period of six (6) months, and every six (6) months thereafter.

SUBJECT	DATE OF ISSUE	PAGE NO.
Performance Evaluation for Managers & Supervisors	04 June 1980	11 of 11

MECHANISM TO GOVERN MERIT INCREASES1. Description of Performance Rating:OUTSTANDING:

Clearly and consistently exceeds position goals and sustains top performance; also, exhibits high potential for advancement to a position of significantly greater responsibility.

VERY GOOD:

Meets all position goals and in most instances exceeds them; also, shows potential for increased responsibility.

AVERAGE:

Meets practically all position goals and in some instances exceeds them; may have some potential for increased responsibility.

UNSATISFACTORY:

Fails to meet position goals satisfactorily, improvement through training, experience and/or individual effort and initiative necessary. An unsatisfactory rating will cause the employee to be placed on 6-month probation and 2 unsatisfactory ratings in a row will result in his separation from the service.

2. The amount of merit increase will depend on the performance rating and the equivalent Pay Step/Salary Increase, as follows:

	<u>No. of Steps</u>	<u>Percentage</u>
Outstanding	Three Steps	28 - 33%
Very Good	Two Steps	19 - 22%
Average	One Step	9 - 10%
Unsatisfactory	No Increase	

Only one increase will be granted for any given one-year period except in highly meritorious and exceptional cases.

original signed
A TRUE COPY

FRANCISCO A. PARAAN

BENGUET CONSOLIDATED, INC.

Senior Staff Performance Policy Manual

SUBJECT: REVISED PERFORMANCE EVALUATION REPORT

Orig. by: FAP Approved by: JVO Date of Issue: 3.01.80 Superseded: FAP-M-2-75

COPIES TO:

All SS

Attached is the revised Performance Evaluation form to be used for managers and supervisors.

Features of the revised rating form are as follows:

I. PERFORMANCE EVALUATION REPORT - FOR STAFF PERSONNEL

1. This form shall be used for both the interim and annual appraisals.
2. Question No. 1 has been improved upon in order to ensure a greater degree of objectivity and at the same time a closer conformity to MBO. In answering this question, ratee is now expected to re-state the three (3) most important objectives presented and approved during the last rating period.
3. Question Nos. 3 and 4 were re-worded but signify the same intentions which are directed to the ratee's weaknesses and improvement possibilities.
4. Question No. 5 is on training needs. The purpose is to emphasize the importance of training and to drive home the point that it is primarily a line function.
5. Adjectival ratings are reduced to four (4) key terms.

Outstanding

Very Good

Average

Unsatisfactory

II. In the rating forms, submission dates are emphasized and will thus make delays easily traceable.

III. EFFECTIVITY

These new forms are to be used effective 1 June 1980.

FRANCISCO A. PARAAN

5.20.80

A TRUE COPY

Personnel Policy Manual

0301

SUBJECT: Performance Evaluation Program ImplementationOrig. by: FAP Approved by: JVO Date of Issue: Nov. 24, 1975 Supersedes: New

COPIES
 TO:
 JVO
 AJF
 APP
 LPM
 GAL
 DLL
 TCT
 All Senior
 Staff
 File

The Performance Evaluation Program will be implemented December 1, 1975 for Senior Staff, subject to adjustment in the future based on actual experience. The program will be evaluated after six months after which time the Junior Staff may be integrated into the program.

The following will govern the implementation of the program in addition to FAP-M-2-75 and other instructions/memoranda:

1. Scheduling of Evaluation

- a. Evaluation will be done on the employment anniversary date of senior staff.

This will distribute the rating load over the whole year and will not unduly burden raters and reviewers. Besides convenience in scheduling, the date is somewhat meaningful to the staff.

- b. Personnel will set up a Master Performance Evaluation Schedule.
- c. Personnel sends form to senior staff due for appraisal, with advise to department head concerned.

2. Steps in Evaluation

- a. Ratee receives 1 copy of Form 301 from Personnel.
- b. Ratee accomplishes Part I of form, signs and submits form within seven days from receipt to his superior.
- c. Rater makes his comments and accomplishes Part II of the form.
- d. Staff is then called in for interview after Step 4. During the interview:

(1) Rater discusses his comments with Ratee, including his overall assessment in Part II.

(2) Rater & Ratee finalizes three most important objectives for the next 6 months.

e. Rater signs form and forwards to the next higher level within 7 days from receipt of form from Ratee.

f. Reviewer has seven days from receipt of form from Rater to forward to higher levels.

3. Frequency of Evaluation

a. Senior Staff are to be evaluated by their immediate superior after the probationary period of 6 months, and every 6 months thereafter.

b. The 6 months frequency of evaluation will be maintained unless revised.

4. Appeal Procedure

The Ratee may appeal to the next higher level (Rater's boss) if the Ratee believes this is necessary, provided he first informs the Rater that he will take his appeal to higher authority.

In many instances, the Rater and the Rater's boss are present during the evaluation interview in certain departments; the new procedure does not call for the Rater's boss presence.

5. Who Rates Who?

a. When staff works operationally under one superior and functionally under another superior:

(1) Ratee accomplishes Form 301 and submits to his operational superior. Operational superior rates jointly with functional superior. Rater's operational superior reviews report jointly with functional superior.

(2) When there is conflict between functional and operational levels, it will be resolved by APP or JVO for Operations and AJF or JVO for Exploration.

- b. When Ratee is new in his job
 - (1) Former boss rates together with new Rater.
 - (2) If former boss is not available next higher level together with new Rater.
- c. New Employee (Ratee) due to transfer, promotion or reorganization

The newly promoted or transferred staff should not yet be rated if he has been on the new job for less than six months.

- d. Staff recently given salary increase/promotion will be evaluated but recommendations/comments will include a statement of the recent increase in pay or promotion and that no increase/promotion is recommended.

6. Listing of Objectives

- a. Emphasize that the 3 most important objectives asked for in the form are only part of the Ratee's job; he must perform all other aspects of his responsibility as well.
- b. If no objectives were set with the Rater, Ratee will list his major accomplishments/achievements during said period.
- c. If objectives were set, accomplish Question No. 1 as per guidelines.
- d. It will help if staff first prepares draft of replies in a separate sheet of paper before finalizing form.

Francisco A. Paraan
FRANCISCO A. PARAAAN

FAP/aca

**BENGUET CORPORATION
BOARD RISK OVERSIGHT COMMITTEE MEETING
2:15 PM March 1, 2021 (Monday)
Board Room, 7/F Universal-Re Building
106 Paseo de Roxas, Makati City**

A G E N D A

FOR APPROVAL:

- (A) Minutes of BOARD RISK OVERSIGHT COMMITTEE meeting held on December 10, 2020 (Ms. Lina G. Fernandez/Ms. Pamela M. Gendrano)

FOR DISCUSSION:

- (B) Dam Raising at TSF-2 (Mr. Valeriano B. Bongalos, Jr.)
- (C) Covid updates (Ms. Rhodora S. Songayab)

OTHER MATTERS

**BENGUET CORPORATION
BOARD RISK OVERSIGHT COMMITTEE MEETING
11:00 A.M. April 27, 2021 (Tuesday)
Board Room, 7/F Universal-Re Building
106 Paseo de Roxas, Makati City**

A G E N D A

FOR APPROVAL:

- (A) Minutes of BOARD RISK OVERSIGHT COMMITTEE meeting held on March 1, 2021 (Ms. Lina G. Fernandez/Mr. Reynaldo P. Mendoza)

FOR DISCUSSION:

- (B) Memorandum of Agreement between BC and Lower Downstream Communities to settle opposition to dam raising; Joint Resolution no. 1, Series of 2021 authorizing deduction of 1% of annual gross production of ACMP contractors and P3M advance as voluntary assistance to the Lower Downstream Communities (Atty. Reynaldo P. Mendoza / Mr. Valeriano B. Bongalos, Jr.)

OTHER MATTERS



BenguetCorp

**Report of the Audit Committee
To the Board of Directors**

The Audit Committee of Benguet Corporation (the “Company” or “BC”) submits this Report to the Board of Directors in compliance with its functions, duties and responsibilities as stated in the Company’s Corporate Governance Manual and the Audit Committee Charter.

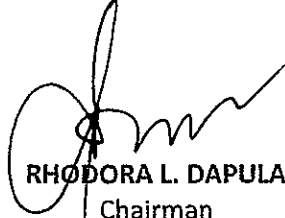
1. As constituted in its charter, the Audit Committee is composed of three (3) Directors, two of whom are Independent Directors, and all are Non-Executive Directors as follows:

Chairman: Dr. Bernardo M. Villegas (Independent Director)
Members: Atty. Rhodora L. Dapula (Independent Director)
Atty. Andrew Patrick R. Casiño

2. The Audit Committee had two (2) meetings in 2021:
 - March 18, 2021
 - November 8, 2021
3. The Audit Committee discussed the following with the Internal Audit Head:
 - 2021 audited Financial Statements of BC and its subsidiaries as presented by the External Auditor, SyCip, Gorres, Velayo & Co. (“SGV”)
 - 2021 SGV audit scope and plans of BC and subsidiaries
 - 2020 and 2021 completed and ongoing works of Audit and Risk covering compliance, corporate governance, document management, risk management, financial and operations audit, ISO, policy documentation and others
4. The Audit Committee reviewed and discussed the audited Financial Statements of BC and its subsidiaries for the year with the management, which has the primary responsibility for the financial statements, and with the External Auditor, SGV.
5. Consistent with its oversight function, the Audit Committee recommended to the Board of Directors (“BOD”) during its regular meeting held on March 28, 2022 the approval of the Company’s 2021 audited Financial Statements and its inclusion in the Company’s annual reports under SEC Form 17-A, for submission to Bureau of Internal Revenue, Securities and Exchange Commission, Philippine Stock Exchange and other regulatory bodies.
6. The Audit Committee reviewed and approved all audit services provided by SGV to the Company and its subsidiaries and the corresponding audit fees for such services, as reported on page 25 of the Company’s 2021 Information Statement, hereto attached for ready reference.

7. For 2021, the Audit Committee confirms that no non-audit work was undertaken by SGV.
8. Based on a review of SGV's performance and qualifications, including consideration of management's recommendations, the Audit Committee endorses for approval of the BOD and stockholders the appointment of SGV as the Independent Auditor of the BC Group of Companies for the year 2021.
9. Based on the review of the reports and discussions with the Management, Internal Audit Head (Mr. Glenn John V. Raras) and the External Auditors (SGV), the Audit Committee confirms that the internal control systems, including financial and operational controls, are adequate and effective.

Submitted on ~~May 17~~ May 18, 2022.



RHODORA L. DAPULA
Chairman

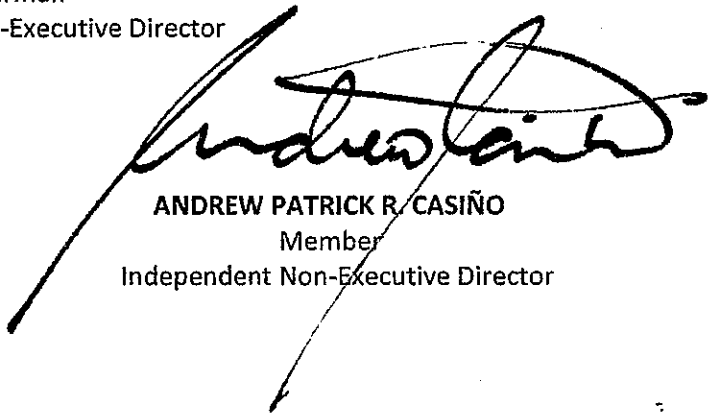
Independent Non-Executive Director



BERNARDO M. VILLEGAS

Member

Independent Non-Executive Director



ANDREW PATRICK R. CASIÑO

Member

Independent Non-Executive Director

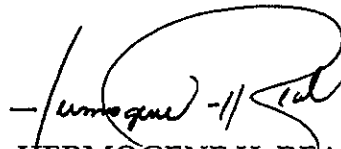


CERTIFICATION

I, **HERMOGENE H. REAL**, Filipino, of legal age and with office address at Universal Re Building, 106 Paseo de Roxas, Makati City, being the duly elected and incumbent Corporate Secretary of BENGUET CORPORATION, a corporation registered under Philippine laws, with principal office at 7/F, Universal-Re Building, 106 Paseo de Roxas, Makati City, hereby CERTIFIES THAT:

- (1) Benguet Corporation is a mining company registered in the Securities and Exchange Commission (SEC) and its shares are listed in the Philippine Stock Exchange (PSE);
- (2) In the Board and Committee Meetings held in 2021, the members of the board of directors present in person and by way of tele/videoconferencing actively participated in the discussion of various matters taken up by the Board and Committee by asking the necessary questions and/or seeking relevant information and explanations of issues under their consideration.
- (3) This Certification is made pursuant to the Integrated Annual Corporate Governance Report of the PSE and SEC, and shall form an integral part thereof.

IN WITNESS WHEREOF, I have hereunto signed this Certification this 26th day of May 2022 in Makati City.


HERMOGENE H. REAL
Corporate Secretary *HR*

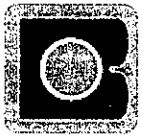
Shirley Cueva

From: Shirley Cueva
Sent: Friday, November 5, 2021 5:19 PM
To: Bernardo Villegas; Marean Pompidou; Jesse eightyone; Andrew Casino; Atty. Rhodora Dapula, CPA; Jose Raulito Paras; [redacted] 7@gmail.com; [redacted] exchangeequity.com; [redacted])gmail.com; [redacted] @yahoo.com; Lina Fernandez
Cc: Reynaldo Mendoza; [redacted] @yahoo.com; Hermogene Real; Adrien Gomez; Roditas Tolentino; [redacted] pplawoffices.com
Subject: BC BOD board materials for Monday, Nov 8, 2021 meeting
Attachments: AGENDA_BOD regular meeting Nov 8, 2021.pdf; D - MINUTES OF AUGUST 24, 2021.pdf; F.2 - September YTD 2021 Financial Performance and Year-end forecast.pdf; G - 2022 Budgets.pdf; H - approval of Christmas Gift for Managers and Officers.pdf; I - SEC CERT~esoip esp trust acct w BPI.pdf; J - Contracts for BOD approval ratification.pdf; L - Update on Mineral Properties.pdf; M - External Facilitator.pdf; L - Update on Mineral Properties.pdf; F.1 - Mgmt Operations Report.pdf

Dear All,

Pls find attached board materials for discussion/approval/notation on Monday, Nov. 8, 2021 meeting.

Thank you.



BenguetCorp

Shirley S. Cueva

Exec. Asst. to the BOD

Phone: DL +63 2 88104368

Mobile: +63 9175007292

Email: scueva@benguetcorp.com

7th Floor Universal RE Building
106 Paseo De Roxas
1226 Makati City

www.benguetcorp.com

Shirley Cueva

From: Shirley Cueva
Sent: Monday, August 23, 2021 2:02 PM
To: Bernardo Villegas; Marean Pompidou; Jesse eightyone; @gmail.com;
Jose Raulito Paras: Atty. Rhodora Dapula, CPA; aahoo.com; 7777
@gmail.com; exchangeequity.com; Lina Fernandez
Cc: Reynaldo Mendoza; @yahoo.com; Valeriano Bongalos Jr.; Hermogene Real;
Roditas Tolentino; Adrien Gomez
Subject: BC BOD MATERIALS - August 24, 2021 at 10:00 a.m.
Attachments: AGENDA 24 August 2021.pdf; C - MINUTES OF MARCH 18, 2021 (2).pdf; C1 - JOINT
NOMINATION COMM & SALARY and STOCK OPTION COMM MINUTES ~ March 18,
2021.pdf; E.1- Operations Report - Aug2021 BC BOD_.pdf; E.2 - BC BOD Presentation_
24Aug2021.pdf; F - Appointment of new Compliance Officer.pdf; G - Retention of BMV
as ID.pdf; H - ASM scheduled meeting in 2021.pdf; J - 4TH RENEWAL OF EXPLORATION
PERIOD OF PANTINGAN.pdf; K - Surigao Coal COC.pdf; L(1) - RE APPROVAL OF
ADDITIONAL INVESTMENT IN AND CAPITAL INCREASE of AOVC.pdf; L(2) - BMCmango
property Voluntary Land Transfer.pdf; M - BNMI amendment of Articles and By-
Laws.pdf; N(1) - Renewal of Marketing Agmt bet BC and BNMI.pdf; N2(a) -
Supplemental Agreement.pdf; N2(b) - PEZA-certificate of Registration No. EZ 11-17.pdf;
N(3) - BC and Orelina signed MOA_Aug 16 2021.pdf; N(4) - Mgmt Agmt with BFC re
Irisan Lime Proj.pdf; N(5) (a) - TSF2_Compromise Agreement_BC LDSC.pdf; N (5) (B) -
Security Services with Longinus Spear Security Agency.pdf; N (5) (c) - Contracts for
approval ratification_Aug 24 2021.pdf; O- Update on Bulk water proj.pdf; O(1) - MOA
RENEWAL WITH MANILA WATER OVER LABOY RIVER.pdf; P - Update on various BC
Properties.pdf

Importance: High

Dear All,

Attached is the AGENDA including copies of board materials for tomorrow's discussion and approval.

Thank you.

OFFICE OF THE CORPORATE SECRETARY



SHIRLEY S. CUEVA
Benguet Corporation
8810-4368
7F Universal-Re Building
106 Paseo de Roxas, Makati City

Shirley Cueva

From: Shirley Cueva
Sent: Wednesday, March 17, 2021 2:58 PM
To: uap.asia; marean pompidou; j yahoo.com; 56
@gmail.com; Andrew Casino; @gmail.com; aahoo.com;
f - @yahoo.com; Reginald S. Velasco; li changeequity.com
Cc: Lina Fernandez; Reynaldo Mendoza; 'l @yahoo.com'; Valeriano Bongalos Jr.;
_ l @yahoo.com
Subject: BC BOD materials
Attachments: BC BOD agenda March 18, 2021.docx; C - MINUTES OF NOV 10, 2020.docx; C(2) - Organizational BOD minutes of Nov 11 2020.pdf; E1 - Mgmt Operations Report - Mar18-2021 BC BOD.ppt; E-2BC BOD Presentation_18Mar2021.pptx; F - LCYEE_resignation.pdf; H - March 1, 2021 Memo re Stock Option Awards - Part VI.pdf; I - BROC Report~Update.doc; J1- PANTINGAN_BODMar18_rev.pdf; J1 - CTEch Drill Quotation.pdf; J(2) -Leynes Law Office (LGTON) Engagement Agreement.pdf; J(3) - APP engagement letter.pdf; J(4) - Change in Capital Increase of BCPM_AOVC.pdf; J(5) - MOA with SEVDC.pdf; J(7) Contracts for approval ratification_March 18 2021.pdf; J(7) a vaccine purchase Term Sheet.pdf; K(1) SECCERT_amended reso on change of mobile no.doc; K(2) - SEC required reso on online submission tool (OST).docx; K(3)letter to BC BOD re SEC MC no.1, s.2021.pdf; L - Update on Mining Projects ~ Other Properties.pdf; M(1) - BOD Self Assessment Worksheet.xlsx; M(2) - Audit Com Self Assessment Worksheet.xlsx; M(3) - BROC Self Assessment Worksheet.xlsx

Dear BC Directors:

Attached are materials for discussion in tomorrow's (March 18, 2021) BOD meeting.

Thank you.

SHIRLEY S. CUEVA
Exec. Asst. to the BOD



Benguet Corp
7F Universal Re Building
106 Paseo de Roxas
Makati City
Tel. 88104368

Shirley Cueva

From: Bernardo Villegas <[redacted]>
Sent: Monday, April 25, 2022 12:30 PM
To: Shirley Cueva
Subject: Re: PROFILE update
Attachments: image001.png

The profile is correct.

BMV

On Mon, Apr 25, 2022, 11:02 AM Shirley Cueva <[redacted]> wrote:

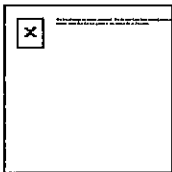
BMV/Sir:

We'd like to follow-up and confirm your updated profile as indicated below. We have added your directorship in Filipino Fund as you disclosed last Feb 2020,

Please confirm if below's profile is updated.

Thank you.

Sincerely,



Shirley S. Cueva

Exec Asst

Phone: DL +63 2 88104368

Mobile: +63 9175007292

Email: scueva@benquetcorp.com

7th Floor Universal RE Building

106 Paseo De Roxas

1226 Makati City

www.benguetcorp.com

From: Bernardo Villegas <[redacted]>
Sent: Thursday, February 27, 2020 4:51 PM
To: Shirley Cueva <[redacted]>
Subject: Re: Profile update

Directorship in Filipinas Fund, which is a publicly listed company.

BMV

BERNARDO M. VILLEGAS, Chairman of the Board / Independent Director,
Chairman of Related Party Transactions Committee, Nomination Committee
and Corporate Governance Committee; Member of Executive Committee,
Board Risk Oversight Committee, Audit Committee and Salary & Stock Option
Committee

Mr. Bernardo M. Villegas, Filipino, 83 years old, has been the Chairman of the Board since November 7, 2019. He first became a Director of the Company by appointment on June 25, 1998. He was designated Independent Director of the Company since 2002 up to present, although he has been a Director prior to the issuance of SEC Circular No. 16 dated November 29, 2002. He is currently Chairman and Independent Director of listed company, Filipino Fund, Inc. He holds, among others, the following directorships/positions: Independent Director of Benguetcorp Resources Management Corporation (Formerly Benguetcorp Nickel Mines, Inc.) (2012 to present), a wholly owned subsidiary of the Company; Director and Consultant of Transnational Diversified, Inc. (1998 to present); Director, PHINMA Properties (2011 to present); Director, Dualtech Foundation (1998 to present); and Columnist, Manila Bulletin (1964 to present). Formerly, he was Director of Alaska Milk Corporation (1999-2019); Director, Makati Business Club (1981-2010); Director, Phinma Foundation (1995-2001); Director, Pilipinas Shell Foundation (1995-2001); Senior Vice President, University of Asia and the Pacific (2004-2006); Chairman, Center for Research and Communication (1995); President, Philippine Economic Society (1972-1974); Chairman, Department of Economics-De La Salle University Manila (1964-1969), Committee on the National Economy & Patrimony (1986); Director, Economic Research Bureau and Graduate School of Business-De La Salle University Manila (1967-1968); Project Director, Philippine Economic History under the National Historical Commission (1969-1972); Member, Preparatory Commission for Constitutional Reforms and Constitutional Commission (1999); Consultant, Productivity Development Center-National Economic Council and Program Implementation Agency (1968-1969).

DISCLAIMER: This e-mail message is intended to be received only by persons authorized to receive the same and use the confidential information it may contain. E-mail messages to clients of Benguet Corporation may contain information that is confidential and legally privileged. Please do not read, copy, forward, or store this message unless you are an intended recipient of it. Unauthorized disclosure, copying, distribution or use of the contents of this message is strictly prohibited. If you have received this message in error, please forward it to the sender and delete it completely from your computer system. Benguet Corporation is neither liable for the proper and complete transmission of the information contained in this message nor for any delay in its receipt.

Shirley Cueva

From: Roditas Tolentino <rtolentino@...com>
Sent: Thursday, May 12, 2022 12:26 PM
To: Shirley Cueva
Subject: RE: LJV Profile update

Luis J. L. Virata Filipino, 68 years old, first became a Director of the Company by appointment on August 8, 1995 and holds over as a director since then. He is currently Director of *listed company*, Nickel Asia Corporation. He is the founder and Chairman of Amber Kinetics Philippines, Inc. Mr. Virata is also Chairman Emeritus of Exchange Equity Partners Group Corporation, Chairman of Cavitex Holdings, Inc., Vice President of Exchange Properties Resources Corp., and a Director of Benguet Corporation. He is also a Founder and Trustee of Asia Society Philippine Foundation and the Metropolitan Museum of Manila and is a member of the Huntsman Foundation. Mr. Virata previously held positions with Dillon, Read and Co., Crocker National Bank, Bankers Trust Company, Philippine Airlines, the Philippine Stock Exchange and the Makati Stock Exchange. He received his Bachelor of Arts and Master of Arts degrees in Economics from Trinity College, Cambridge University in 1976 and his Master of Business Administration degree from the Wharton School of the University of Pennsylvania, USA in 1979.

From: Shirley Cueva <scueva@...com>
Sent: Thursday, May 12, 2022 10:25 AM
To: Roditas Tolentino <rtolentino@...com>
Subject: Re: LJV Profile update

Ok thanks

Get [Outlook for Android](#)

From: Roditas Tolentino <rtolentino@...com>
Sent: Thursday, May 12, 2022, 10:21 AM
To: Shirley Cueva <scueva@...com>
Subject: RE: LJV Profile update

Shirley Cueva

From: Adrien Gomez <dr...@gmail.com>
Sent: Monday, April 25, 2022 5:49 PM
To: Shirley Cueva
Cc:
Subject: Re: FW: Profile update

Good afternoon maam.

KWOK YAM IAN CHAN, Director

Member of Executive Committee

Mr. Kwok Yam Ian Chan, British, 34 years old, first became a Director of the Company by appointment on September 25, 2020 and holds over as director since then. He is currently an Independent Director of listed company Marcventures Holdings, Inc. He is a Managing Director of Zenith System and Heavy Equipment, Seaborne Shipping Inc., Isky Empire Realty Inc., King Dragon Realty Corporation and DK Ventures Inc. Previously, he was President (2013-2017) and Managing Director (2010-2017) of Dunfeng Philippines International Inc.; and served as Director of Mannage Resource and Trading Inc. (2015-2017). Mr. Chan graduated from DLS- College of St. Benilde with a Bachelor of Science degree in Business Administration major in Export Management. He obtained his master's degree in Economics, major in Finance at California Polytechnic University.

On Mon, Apr 25, 2022 at 5:04 PM Shirley Cueva <...@...com> wrote:

Hi Adrien,

Any changes on profile of Mr. Ian Chan below? Pls confirm.

Thank you.

Regards,

Shirley

From: Shirley Cueva
Sent: Friday, April 1, 2022 3:23 PM
To: |
Cc: Adrien Gomez <...@gmail.com>
Subject: Profile update

Dear Mr. Ian Chan,

Shirley Cueva

From: Shirley Cueva
Sent: Tuesday, April 26, 2022 8:54 AM
To: Eden Barcelona
Subject: From JREP - Profile update

From: JOSE RAULITO ENOY PARAS <[redacted]>
Sent: Thursday, April 21, 2022 10:45 PM
To: Shirley Cueva <[redacted]>
Subject: RE: Profile update

Hi Shirley, there are no significant change in my profile. How much again is the amount I owe you. Thank you.- Atty. Paras

Sent from [Mail](#) for Windows

From: [Shirley Cueva](#)
Sent: Monday, April 25, 2022 5:17 PM
To: [Jose Raulito Paras](#)
Subject: FW: Profile update

JREP/Sir:

- 1) Would like to follow-up if there is any change/addition to your profile below? Pls confirm.
- 2) May I follow-up please for the reimbursement of the RPT on your Woodspark property we advanced?

Thank you.

Regards,

Shirley

From: Shirley Cueva
Sent: Friday, April 1, 2022 12:40 PM
To: Jose Raulito Paras <[redacted]>
Cc: f [redacted]
Subject: Profile update

JREP/Sir:

This is to request for updating of your profile below which will be printed in BC's Annual Report/Information Statement. Kindly include trainings/seminars you attended for 2021. Please confirm if there are no changes except your age.

Thank you.

Shirley Cueva

From: anthony te <[redacted]@[redacted].com>
Sent: Friday, April 1, 2022 4:03 PM
To: Shirley Cueva
Subject: Re: Profile update

Hi Shirley, yes still the same and only age has changed. Thanks

Sent from my iPhone

On Apr 1, 2022, at 3:11 PM, Shirley Cueva <[redacted]> wrote:

Dear Mr. Te,

This is to request for updating of your profile below which will be printed in BC's Annual Report/Information Statement. Kindly include trainings/seminars you attended for 2021.

Please confirm if there are no changes except your age.

Thank you.

OFFICE OF THE CORPORATE SECRETARY

ANTHONY M. TE, Director
Member of Executive Committee, Salary and Stock Option Committee and
Nomination Committee

Mr. Anthony M. Te, Filipino, 52 years old, first became a Director of the Company by appointment on September 25, 2020 and holds over as director since then. He is currently a Director of listed company Marcventures Holdings, Inc.; Director of Marcventures Mining & Development Corporation; Chairman of the Board of Asian Appraisal Company, Inc., Amalgamated Project Management Services, Inc., Asian Asset Insurance Brokerage Corporation and AE Protiena Industries Corporation. He serves as Chairman and Chief Finance Officer of Mactel Corporation, and as Director and Treasurer for Manila Standard Today Management, Inc. Mr. Te is a licensed soliciting official for Non-Life Insurance with the Philippine Insurance Commission. He previously sat as Director in the following companies: AG Finance, Inc., Balabac Resources & Holdings Company Inc., Commonwealth Savings & Loans Bank, EBECOM Holdings, Inc., Equitable PCI BANK, MRC Allied Industries, Inc., Oriental Petroleum & Minerals Corporation, PAL Holdings, Inc., PGA Cars, Inc., and Phoenix Energy Corporation. Mr.

BOARD SELF - ASSESSMENT WORKSHEET

BENGUET CORPORATION

Board Self-Assessment Summary

The rating scores are as follows:

5	Yes, I strongly agree
4	Yes, I agree, but this can be improved
3	Undecided
2	No, but there are efforts to do so
1	No, I strongly disagree

Legend:

AMT	Anthony M. Te
BMV	Bernardo M. Villegas
JHTA	Jesse Hermogenes T. Andres
JREP	Jose Raulito E. Paras
KYIC	Kwok Yam Ian Chan
LGF	Lina G. Fernandez

LJLV	Luis Juan L. Virata
MRP	Maria Remedios Paz R. Pompidou
PARC	Patrick Andrew R. Casifio
RLD	Rhodora L. Dapula
RSV	Reginald S. Velasco

NO.	QUESTION	RATING PER BOB											AVERAGE PER RATE	AVERAGE PER CATEGORY	WEIGHT PER CATEGORY		
		AMT	BMV	JHTA	JREP	KYIC	LGF	LJLV	MRP	PARC	RLD	RSV					
1	Board Responsibilities (45%)															4.45	2.00
1.1	Does the Board demonstrate commitment to good corporate governance practices and provide oversight to ensure that the Corporation is operated in a moral, legal, and ethical manner, and that decisions are carried out in accordance with applicable laws and by its own by-laws and policies?	5	5	4	4	5	5	5	5	5	5	5	5	4.82			
1.2	Has the Board established a clear strategic direction for the Corporation?	5	4	4	4	5	5	5	5	5	5	5	5	4.73			
1.3	Is the Board proactive in formulating policies to direct management towards effective strategy formulation?	4	5	4	4	5	5	5	5	4	5	5	4.64				
1.4	Does the Board review and approve annual capital and operating budget? Does it effectively monitor performance against budget throughout the year?	5	5	5	5	5	5	5	4	3	5	5	4.73				
1.5	Has the Board asked for clear measures by which to track progress in the Corporation's pursuit of its targets?	4	4	4	4	5	5	5	5	5	5	4	4.55				
1.6	Has the Board asked for clear targets including set timelines of specific initiatives and action programs to support the Corporation's targets?	4	4	4	4	5	5	5	5	1	4	4	4.09				
1.7	Does the Board regularly consider the performance of peer or comparable companies in tracking the Corporation's performance and uses these as benchmarks for management?	4	5	3	2	4	5	5	4	3	5	4	4.00				
1.8	Is the culture of governance and responsibility continuously being strengthened in the Corporation?	4	5	4	4	5	5	5	5	5	5	5	4.73				
1.9	Does the Board undertake an annual performance evaluation of the President?	4	4	3	1	5	5	5	4	3	4	4	3.82				
2	Board Processes and Meetings (45%)														4.62	2.08	
2.1	Does the Chair engage the participation of all members of the Board, particularly getting them to contribute to strategy formulation and oversight of strategy execution?	5	4	4	4	5	5	5	5	5	5	5	4.73				
2.2	Does the Chair ensure that the President has enough discretion so that management takes on the responsibility for executing strategy?	5	5	4	4	5	5	5	4	5	5	5	4.73				
2.3	Does the President keep the Board fully informed of progress and problems arising from strategy execution?	5	5	5	5	5	5	5	5	3	5	5	4.82				
2.4	Does the Board give the President sufficient direction but enough authority and responsibility to lead and manage the organization successfully?	5	5	5	4	5	5	5	5	4	5	5	4.82				
2.5	Are members of the Board given enough opportunity to engage in open dialogue so they would be part of the Board decision-making process?	5	5	5	4	5	5	5	5	5	5	5	4.91				
2.6	Does the Board conduct regular meeting every month?		4	5	1	5	3	4	2	1	4	4	3.30				
2.7	Do Board Committees meet regularly, and their minutes regularly submitted and confirmed by the Board?	4	5	5	5	5	5	5	5	4	5	4	4.73				
2.8	Are the minutes of the meetings duly taken and show details of deliberation, particularly positions of directors on key issues?	5	5	5	5	5	5	5	5	5	4	5	4.91				
2.9	Do Directors have a right and duty to bring to the attention of the Board any serious or material matters which are of concern to them?	5	5	4	4	5	5	5	5	5	5	4	4.73				

2.10	Does the Board have clear delegation of authority to senior management and regularly review management effectiveness?	4	5	4	3	5	5	5	5	4	5	5	4.55		
3	Performance of Individual Directors (5%)													4.76	0.24
3.1	Do I take time to understand the Benguet Corporation, its goals and strategies, its businesses, its governance and other key policies?	4	5	5	4	5	5	5	5	4	5	5	4.73		
3.2	Do I know the role of the Board in strategy formulation, analysis and implementation, and the distinction from that of management?	4	5	5	2	5	5	5	5	5	5	5	4.64		
3.3	Do I regularly attend and actively participate in all meetings of the Board, Committees, and shareholders, except when prevented by justifiable cause?	5	5	5	5	5	5	4	5	5	5	5	4.91		
3.4	Do I review meeting materials and if called for, ask the necessary questions or seek clarifications and explanations in Board and Committee meetings?	4	5	5	5	5	5	5	5	4	5	5	4.82		
3.5	Do I think and act independently in all my decisions as a member of the Board of Directors?	5	5	4	4	4	5	5	5	5	5	5	4.73		
3.6	Do I always exercise independent judgment?	5	5	4	4	5	5	5	5	5	5	5	4.82		
3.7	Do I fully reveal conflicts of interest?	5	5	5	4	5	5	5	5	5	5	4	4.82		
3.8	When potential or actual conflicts of interest are found, do I abstain from participating or voting?	5	5	5	4	3	5	5	5	5	5	4	4.64		
3.9	Do I keep myself informed of best corporate governance practices, industry developments, and business trends affecting the businesses of the Company?	4	5	5	5	5	5	5	5	3	5	5	4.73		
4	Board Structure (3%)													4.84	0.15
4.1	Does the Board have independent directors?	5	5	5	5	4	5	5	5	5	5	5	4.91		
4.2	Have Board Committees been set up, and are they functioning properly, at least by meeting regularly, following the written charters specified for their duties?	5	5	5	5	5	5	5	5	5	5	5	5.00		
4.3	Are members of the Board Committees independent in their actions and contributions as they discharge their Committee duties?	5	5	5	5	5	5	5	5	5	5	5	5.00		
4.4	Is the Board effectively living up to its duties towards the stockholder of the Corporation?	5	5	5	4	5	5	5	5	5	5		4.45		
5	Board Management Relationship (2%)													4.45	0.09
5.1	Is there a clear understanding of where the role of the Board ends and where that of the President/management begins?	5	5	5	3	5	5	5	5	5	5	4	4.73		
5.2	Has the Board discussed and approved the President's Key Result Areas and regularly reviews the performance of the President?	4	5	4	2	5	4	5	4	3	5	5	4.18		
5.3	Has the Board actively challenged the President/management in order to understand the business better and to drive improvements in the Corporation's performance? Is there a frank and open two-way discussion which fosters critical thinking and incisive questioning?	5	5	5	3	5	5	5	5	2	5	4	4.45		
Comments, Observations and Suggestions:														4.56	out of perfect 5
BMV	The Board can meet more frequently.														
PARC	Tried to be as objective as possible.														
RSV	As a Board Director, I have done my best to help improve the overall performance and profitability of Benguet Corp. and its subsidiaries. With the help of the Board of Directors and the officials of Benguet Corp., the company is now back to its pre-pandemic profitability.														

AUDIT COMMITTEE SELF - ASSESSMENT WORKSHEET

BENGUET CORPORATION

Audit Committee Self-Assessment Summary

The rating scores are as follows:

5	Excellent
4	Above Average
3	Average
2	Below Average
1	Poor

Legend:

BMV	Bernardo M. Villegas
PARC	Patrick Andrew R. Casiño
RLD	Rhodora L. Dapula

NO	QUESTION	RATING PER BOD			AVERAGE RATE	AVERAGE PER CATEGORY	REMARKS	
		BMV	PARC	RLD			MEMBER	COMMENT
1	Committee Structure and Operation					4.73		
1.1	Composition of at least three (3) directors.	5	3	5	4.3			
1.2	Directors have adequate financial and accounting background, and/or audit experience, in addition to adequate understanding of the financial management systems and environment.	5	2	5	4.0			
1.3	Independence of the Chairman of the Committee.	5	5	5	5.0			
1.4	Appointment and removal of the members of the Audit Committee by the Board.	5	5	5	5.0			
1.5	Meeting of the Committee at least twice a year.	5	5	5	5.0			
1.6	Free and open communication with external auditors, internal auditors and Management.	5	5	5	5.0			
1.7	Full access to all records, books of accounts, facilities and personnel in investigating any matter brought to its attention.	5	5	5	5.0			
1.8	Authority to retain and terminate outside counsel or other experts.	5	5	4	4.7			
1.9	Appropriate resources and authority to discharge its responsibilities.	5	3	5	4.3			
1.10	Performance of any other functions delegated to the committee by the Board.	5		5	5.0			
2	Risk Management and Internal Control					4.13		
2.1	Understand the scope and review of internal and external auditor's evaluation of internal control, and obtain reports on significant findings, recommendations, and management responses.	5	3	5	4.3			
2.2	Monitoring and evaluation of the adequacy and effectiveness of internal control system, assessment of financial security control and information technology security.	5	2	5	4.0			

NO	QUESTION	RATING PER BOD			AVERAGE RATE	AVERAGE PER CATEGORY	REMARKS		
		BMV	PARC	RLD			MEMBER	COMMENT	
2.3	Evaluation of the sufficiency and effectiveness of risk management processes and policies.	5	2	4	3.7				
2.4	Establishment and oversee procedures for the receipt, retention and treatment of complaints received, including procedures relating to risk management, legal and regulatory compliance, accounting, internal control or auditing matters.	5	3	5	4.3				
2.5	Require Management to provide a report to discuss with the Committee, the Company's significant or major risk exposures, if any, and the steps taken by the management to monitor or manage such risks.	5	4	5	4.7				
2.6	Investigations of irregularities in operations and anomalies on matters relating to finance and of funds disbursements which bear strategic significance and recommend to the Board necessary actions.	5	3	4	4.0				
2.7	Coordination, monitoring and facilitate compliance with laws, rules and regulations.	5	2	5	4.0				
2.8	Preparation and implementation of a Business Continuity Plan	5	2	5	4.0				
3	Overseeing Financial Reporting and Disclosures						4.39		
3.1	Compliance with laws, financial reporting regulations and internal procedures through review of reports from management, external and internal auditors.	5	4	5	4.7				
3.2	Review of the adequacy and effectiveness of the systems of internal control, accounting practices and disclosure controls and procedures.	5	3	5	4.3				
3.3	Review of new accounting standards and developments and its impact.	4	2	5	3.7				
3.4	Monitoring of the integrity of the financial information by reviewing the relevance and consistency of the accounting standards used.	5	2	5	4.0				
3.5	Assessment of correctness, completeness, consistency and accuracy of financial annual and interim reports before submitting to the Board for approval or made public.	5		5	5.0				
3.6	Review of the quarterly, half-year and annual financial statements before submission to the Board.	4		5	4.5				
3.7	Review and approval or ratification of interested persons transactions and potential conflict of interest situations.	5	3	5	4.3				
3.8	Evaluation whether interested persons transactions are on normal commercial terms and not prejudicial to the interests of the Company or its minority shareholders.	5	3	5	4.3				

NO.	QUESTION	RATING PER BOD			AVERAGE RATE	AVERAGE PER CATEGORY	REMARKS	
		BMV	PARC	RLD			MEMBER	COMMENT
3.9	Ensure that a transparent financial management system is established to ensure the integrity of internal control activities throughout the Company.	5	4	5	4.7			
4	Overseeing Internal Audit					4.70		
4.1	Provide direction to Internal Audit Office to further upgrade its performance.	4	3	5	4.0			
4.2	Recommendation to the Board the terms for the appointment, removal and replacement of the Internal Audit Head.	5		4	4.5			
4.3	Evaluation of the internal audit function including the extent and scope of its work, organizational structure and qualification.	5		5	5.0			
4.4	Review of the effectiveness of internal audit function, and compliance with International Standards on the Professional Practice of Internal Auditing.	4		5	4.5			
4.5	Assurance that the internal auditor have free and full access to all the Company's records, properties and personnel relevant to and required by his functions.	5	5	5	5.0			
4.6	Assurance that the internal audit activity shall be free from interference in determining its scope, performing its work and communicating its results.	5	5	5	5.0			
4.7	Consideration and discussion with Management whether to in-house or outsource internal audit function.	4	4	5	4.3			
4.8	Review and approval of annual internal audit plan.	5	4	5	4.7			
4.9	Ensure that the internal audit plan include the audit scope, resources and budget necessary to implement it, including the allocation of audit resources according to the key business and financial risks areas.	5	4	5	4.7			
4.10	Review of internal auditor's evaluation of the system of internal accounting controls.	5	5	5	5.0			
4.11	Review of reports submitted by the internal auditor before submission to the Board.	5	5	5	5.0			
5	Overseeing External Audit					4.87		
5.1	Evaluation of independence, professional qualifications and competence of external auditor.	5	5	5	5.0			
5.2	Recommendation to the Board the appointment, replacement and/or retention of external auditor.	5	5	5	5.0			
5.3	Evaluation of the performance of external auditor periodically.	4	5	5	4.7			

NO.	QUESTION	RATING PER BOD			AVERAGE RATE	AVERAGE PER CATEGORY	REMARKS	
		BMV	PARC	RLD			MEMBER	COMMENT
5.4	Assurance of the regular rotation of the lead partner and consideration and discussion with management whether there should be a regular rotation of external auditor itself, at least once every five (5) years or more frequently.	5		5	5.0			
5.5	Evaluation and determination of non-audit services, if any, and periodically review of non-audit fees paid.	5		5	5.0			
5.6	Disallow of any audit work that will conflict or may pose a threat to external auditor's independence.	5	3	4	4.0			
5.7	Disclosure of non-audit work, if allowed, in the Corporation's annual report.	5		5	5.0			
5.8	Review with the external auditor of the scope and results of the audit, problems or difficulties encountered.	5	5	5	5.0			
5.9	Review of Management's response, and any questions, comments or suggestions the auditor may have relating to the internal controls and accounting practices and procedures, of the Company and its subsidiaries	5	5	5	5.0			
5.10	Review of reports submitted by the external auditor before submission to the Board and ensure compliance with auditing standards.	5	5	5	5.0			
Comments, Observations and Suggestions:						4.56	out of perfect 5	
BMV	We can meet more frequently.							
PARC	I tried to be as objective as possible.							

BOARD RISK OVERSIGHT COMMITTEE SELF - ASSESSMENT WORKSHEET

BENGUET CORPORATION

Board Risk Oversight Committee Self-Assessment Summary

The rating scores are as follows:

5	Excellent
4	Above Average
3	Average
2	Below Average
1	Poor

Legend:

BMV	Bernardo M. Villegas
JREP	Jose Raulito E. Paras
RSV	Reginald S. Velasco

NO.	QUESTION	RATING PER BOD			AVERAGE RATE	AVERAGE PER CATEGORY
		BMV	JREP	RSV		
1	Committee Structure and Operation					4.67
1.1	Composition of at least three (3) directors, two (2) of whom shall be independent.	5	4	5	4.67	
1.2	Chairman of the Committee is appointed by the Board and must be an independent director.	5	4	5	4.67	
1.3	Annual election, removal and fill-in any vacancies in the Committee by the majority vote of the Board.	5	4	5	4.67	
2	Authority, Roles and Responsibilities					4.29
2.1	Establishment of risk management culture throughout the organization.	5	4	5	4.67	
2.2	Promotion of an open discussion regarding risks faced by the Company and its subsidiaries/affiliates.	5	4	5	4.67	
2.3	Review and discussion with Management of its risk governance structure and adequacy of risk management resources, policies and processes.	5	4	4	4.33	
2.4	Review and recommendation to the management the levels of risk appetite, risk tolerance and risk exposure allocation for approval by the Board of Directors.	5	4	4	4.33	

NO.	QUESTION	RATING PER BOD			AVERAGE RATE	AVERAGE PER CATEGORY	
		BMV	JREP	RSV			
2.5	Review of the Company's risk profile on an ongoing basis and re-evaluation of the likelihood of occurrence, severity of impact and any mitigating measures.	5	4	4	4.33		
2.6	Monitoring of the implementation of the Company's risk mitigation plans and other risk management activities.	5	4	5	4.67		
2.7	Review and discussion of risk management-related reports and issues raised by the management, internal auditors, external auditors, legal counsel and regulators.	5	4	5	4.67		
2.8	Review of disclosures regarding risk contained in the Annual Report and other publicly issued statements.	5	4	4	4.33		
2.9	Review of the objectivity, effectiveness and efficiency of the risk management function in the context of the Company's size, scale, complexity and scope of operation.	5	4	5	4.67		
2.10	Secure independent expert advice on risk management matters when it is necessary.	5	1	4	3.33		
2.11	In coordination with the Audit Committee, assurance that the internal audit plan is aligned with risk management activities and that the internal control system considers all risks identified.	5	2	4	3.67		
2.12	Reasonable free and full access to the Company's data, records, properties, information from employees, officers, directors or external parties that may be relevant in monitoring and assessing risk exposures and their implications.	5	4	5	4.67		
2.13	Review and reassessment of BROC Charter at as it deems necessary.	5	2	4	3.67		
2.14	Authority of the Board to amend or modify any provision of the Charter at any time.	5	2	5	4.00		
3	Procedures						4.42
3.1	Identification and classification by the process owners of the risks and the propose actions to address the same.	5	4	5	4.67		

NO.	QUESTION	RATING PER BOD			AVERAGE RATE	AVERAGE PER CATEGORY
		BMV	JREP	RSV		
3.2	Collating, organizing and preparing a consolidated report on Company-wide risks by the Risk Management Officer.	5	4	4	4.33	
3.3	Preparation of risk assessment report by the Risk Management Officer and propose solutions to the Management for discussion and finalization before submission to the BROC.	4	4	5	4.33	
3.4	Submission and presentation of the report to the Board by the BROC Chairman, containing updates on all actions initiated by the Committee at the Board Meeting.	4	4	5	4.33	
4	Meetings and Quorum					
4.1	Committee meeting is at least twice a year, or more frequently as needed	5	4	5	4.67	
4.2	Meetings are presided by the Committee Chairman and attended by all members, whether in person or via teleconference or videoconference. Meeting shall not proceed in the absence of a quorum.	5	4	5	4.67	
4.3	Minutes of the Committee meeting is recorded and maintained by the Office of the Corporate Secretary and presented to the Committee at the next meeting for approval	5	4	5	4.67	
4.4	Aside from regular meetings, the Committee constructs and agree on an annual calendar, which will lay down the schedule of activities for the year.	5	4	4	4.33	
	Comments, Observations and Suggestions:					4.49
BMV	Once the pandemic is put under reasonable control, it is desirable that the meetup of the Board and the various committees be face to face for greater interaction and coordination.					
RSV	BRO Committee's work has been outstanding since its reorganization a few years ago.					

EXECUTIVE COMMITTEE SELF - ASSESSMENT WORKSHEET

BENGUET CORPORATION

Executive Committee Self-Assessment Summary

The rating scores are as follows:

5	Excellent
4	Above Average
3	Average
2	Below Average
1	Poor

Legend:

AMT	Anthony M. Te
BMV	Bernardo M. Villegas
KYIC	Kwok Yam Ian Chan
JHTA	Jesse Hermogenes T. Andres
LGF	Lina G. Fernandez

NO.	QUESTION	RATING PER BOARD MEMBER					AVERAGE RATE	AVERAGE PER CATEGORY	REMARKS	
		AMT	BMV	KYIC	JHTA	LGF			MEMBER	COMMENT
1	Committee Structure and Operation							5.00		
1.1	The Executive Committee is composed of at least three (3) members.	5	5	5	5	5	5.0			
1.2	At least one (1) of the Committee members is an Independent Director.	5	5	5	5	5	5.0			
1.3	Meeting(s) is (are) called with reasonable notice to the Committee members.	5	5	5	5	5	5.0			
1.4	The majority of members are present in meetings in person or by phone/virtual, and at least one (1) independent director is present.	5	5	5	5	5	5.0			
2	Purpose, Duties and Responsibilities							4.90		
2.1	Acts on behalf of the Board in intervals between meetings of the Company's Board of Directors for prompt and speedy action of essential matters.	4	5	5	5	5	4.8			
2.2	Ensure that the directors nominated and elected by the holders of Convertible Preferred Class A Stock and Common Class A Stock and the directors nominated and elected by the holders of Common Class B Stock are proportionately represented.		5	5	5		5.0			
2.3	As necessary, the Committee may invite members of management and organization staff of the Company and any of its subsidiaries, to attend the Committee meeting and provide pertinent information and data.	5	5	5	5	5	5.0			
2.4	The Committee has full access to management and its subsidiaries for the performance of its duties and responsibilities. The Committee may also obtain external legal counsel or independent professional advice if it considers it necessary in the performance of its functions.	5	5	5	4	5	4.8			
	Comments, Observations and Suggestions:							4.95	out of perfect 5	

SALARY AND STOCK OPTION (COMPENSATION) COMMITTEE SELF - ASSESSMENT WORKSHEET

BENGUET CORPORATION

Salary and Stock Option (Compensation) Committee Self-Assessment Summary

The rating scores are as follows:

5	Excellent
4	Above Average
3	Average
2	Below Average
1	Poor

Legend:

AMT	Anthony M. Te
BMV	Bernardo M. Villegas
JHTA	Jesse Hermogenes T. Andres
RSV	Reginald S. Velasco

NO.	QUESTION	RATING PER BOD				AVERAGE RATE	AVERAGE PER CATEGORY	REMARKS	
		AMT	JHTA	BMV	RSV			MEMBER	COMMENT
1	Committee Structure and Operation						4.88		
1.1	The Salary and Stock Option Committee is composed of at least three (3) members.	5	5	5	5	5.0			
1.2	At least one (1) of the Committee members is an Independent Director.	5	5	5	5	5.0			
1.3	Meeting(s) for the year is (are) planned and with reasonable notice to the Committee members.	5	5	5	4	4.8			
1.4	The majority of members are present in meetings in person or by phone/virtual, and at least one (1) independent director is present.	5	5	5	4	4.8			
2	Purpose, Duties and Responsibilities						4.61		
2.1	Oversight in the remuneration and compensation plans of directors, senior management, and other key personnel.	5	5	4	4	4.5			
2.2	Creation of transparent procedures in determining, evaluating, recommending, and approving remuneration and compensation plans of directors, officers and other key personnel.	5	5	4	4	4.5			
2.3	Review of the Company's equity incentive plans such as stock options and other stock-based plans and recommended changes to the Board.	5	4	4	5	4.5			
2.4	Interpret/construct any provision of the Stock Option Plan and of the options granted to eligible employees and consultants.	5	4	4	5	4.5			
2.5	Crafting of the Full Business Interest Disclosure that compels all incoming officers to disclose conflict of interest that may directly or indirectly affect their performance of duty.	5	4	5	5	4.8			
2.6	Report to the BOD any incentive pays or bonus arrangement that is excessive and is likely to impact the financial statements negatively.	5	5	5	4	4.8			
2.7	Regular review of the Charter and proposal to the Board for the required changes/modifications of the Charter.	5	4	5	5	4.8			

**REPUBLIC OF THE PHILIPPINES)
MAKATI CITY, METRO MANILA) S. S.**

CERTIFICATION

I, **ROSARIO S. BERNALDO**, Director/Treasurer of **CENTER FOR TRAINING AND DEVELOPMENT, INC. ("CTDI")**, with SEC registration number AS094-006299, and with principal office at 2207 Floor Cityland Condominium 10 Tower 1, 156 H.V. Dela Costa Street Ayala North, Makati City, on oath state:

- 1) That CTDI is an Accredited Training Provider on Corporate Governance by virtue of the Certificate of Accreditation No. CG2020-003 issued by the SEC on November 26, 2020, with validity period of three (3) years;
- 2) That for the year 2021, CTDI was engaged by **Benguet Corporation** to be its external facilitator in relation to the Corporation's Board Self-Assessment, pursuant to SEC MC No. 19 series of 2016;
- 3) That as the external facilitator, CTDI conducted the following:
 - a) Carried out and assisted in the conduct of the board self-assessment;
 - b) Collected and analyzed the summary of the survey questionnaire for report preparation;
 - c) Prepared a commentary based on the results of the survey questionnaire;
 - d) Identified the areas of improvement for consideration of the Corporation's Board and its committees;
 - e) Prepared conclusions and recommendations to address such areas of improvement; and,
 - f) Finalized the report for dissemination to the Corporation's Board and its committees.
- 4) That this Certification is issued in compliance with the Corporation's submission of its Integrated Annual Corporate Governance Report (I-ACGR) and for whatever legal purpose it may serve.

MAY 17 2022


IN WITNESS WHEREOF, I have hereunto set my hand this ___ day of _____, 2022, in Makati City.


ROSARIO S. BERNALDO
Affiant

MAY 17 2022

SUBSCRIBED AND SWORN to before me this ___ day of _____, 2022 in Makati City, affiant exhibited to me her Taxpayer Identification Number 109-227-722.

Doc. No. 359 ;
Page No. 72 ;
Book No. XXXX ;
Series of 2022.


ATTY. PEPITO G. PO
NOTARY PUBLIC
UNTIL DECEMBER 31, 2023
IBP NO. 170043 / 12-10-2021 / MAKATI CHAPTER
PTR NO. 8851749 / 01-03-2022 / MAKATI CITY
ROLL NO. 42926
MCLE COMPLIANCE NO. VI-0024225

ACKNOWLEDGEMENT AND AGREEMENT

I hereby acknowledge having received and read the Benguet Corporation Employee Conduct and Discipline (ECD). I understand and agree that it is my responsibility to abide by the provisions and standards set forth in the Handbook.

Strict adherence to the stated rules and guidelines in this handbook is one of the conditions of my continued employment. An infraction will be subjected to disciplinary action, including and up to immediate dismissal.

I also understand that the Company will promptly investigate violations of the provisions stated in the Handbook and treat confidentially to the extend with Company interest and its legal obligations.

I further acknowledge and understand that the statement contained in this Handbook are considered binding and legal, and co-exist with my employment terms of Benguet Corporation as I signify my signature below:




Employee Signature

GLENN JOHN V. RARAS

Employee Name (PRINTED)

Date

Witnessed and Received by:

MARKLESTER D. GALLO

Human Resource Department

Date

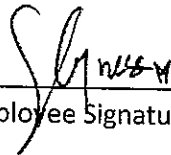
ACKNOWLEDGEMENT AND AGREEMENT

I hereby acknowledge having received and read the Benguet Corporation Employee Conduct and Discipline (ECD). I understand and agree that it is my responsibility to abide by the provisions and standards set forth in the Handbook.

Strict adherence to the stated rules and guidelines in this handbook is one of the conditions of my continued employment. An infraction will be subjected to disciplinary action, including and up to immediate dismissal.

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Employee Signature

9/1/21

Date

GLYNES C. AROZA

Employee Name (PRINTED)

Witnessed and Received by:



MARKLESTER D. GALLO

Human Resource Department

Date

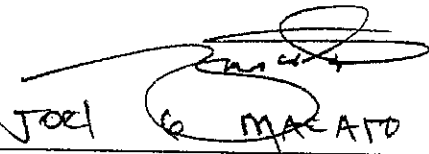
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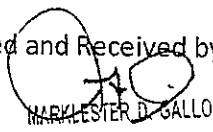
Employee Signature

7/21/24

Date

JOEL G. MACAPOD

Employee Name (PRINTED)

Witnessed and Received by:


Human Resource Department

Date

ACKNOWLEDGEMENT AND AGREEMENT

I hereby acknowledge having received and read the Benguet Corporation Employee Conduct and Discipline (ECD). I understand and agree that it is my responsibility to abide by the provisions and standards set forth in the Handbook.

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I further acknowledge and understand that the statement contained in this Handbook are considered binding and legal, and co-exist with my employment terms of Benguet Corporation as I signify my signature below:



Employee Signature

3/16/21

Date

JERSON S. PENDON

Employee Name (PRINTED)

Witnessed and Received by:



MARKLESTER D. GALLO

Human Resource Department

Date

ACKNOWLEDGEMENT AND AGREEMENT

I hereby acknowledge having received and read the Benguet Corporation Employee Conduct and Discipline (ECD). I understand and agree that it is my responsibility to abide by the provisions and standards set forth in the Handbook.

Strict adherence to the stated rules and guidelines in this handbook is one of the conditions of my continued employment. An infraction will be subjected to disciplinary action, including and up to immediate dismissal.

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I further acknowledge and understand that the statement contained in this Handbook are considered binding and legal, and co-exist with my employment terms of Benguet Corporation as I signify my signature below:



Employee Signature

5/3/21

Date

ALVIN NICOL D. LIBONGCO

Employee Name (PRINTED)

Witnessed and Received by:



MARKLESTER D. GALLO

Human Resource Department

Date



BENGUET CORPORATION

Benguet District Operation
Balatoc, Itogon, Benguet

Acknowledgement of Benguet Corporation's Employee Conduct and Discipline (BECD)

I have read and been informed about the content, requirements, and expectations of Benguet Corporation's Employee Conduct and Discipline (BECD). I have received a copy and agree to abide by the same as a condition of my employment.

I understand that if I have questions, at any time, regarding the BECD, I will consult with my immediate supervisor or the office of the Human Resources Department.

EDDIE N. FANNOT

Signature over Printed Name



benguet.com

Benguet District Operation
Balatoc, Itogon, Benguet

Acknowledgement of Benguet Corporation's Employee Conduct and Discipline (BECD)

I have read and been informed about the content, requirements, and expectations of Benguet Corporation's Employee Conduct and Discipline (BECD). I have received a copy and agree to abide by the same as a condition of my employment.

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Jaysan John Pasqua

Signature over Printed Name




Benguet Corp.

Benguet District Operation
Balatoc, Itogon, Benguet

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I understand that if I have questions, at any time, regarding the BECD, I will consult with my immediate supervisor or the office of the Human Resources Department.


JOHN B. Manganip

Signature over Printed Name



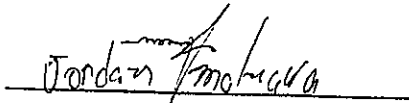
BenguetCorp

Benguet District Operation
Balatoc, Itogon, Benguet

Acknowledgement of Benguet Corporation's Employee Conduct and Discipline (BECD)

I have read and been informed about the content, requirements, and expectations of Benguet Corporation's Employee Conduct and Discipline (BECD). I have received a copy and agree to abide by the same as a condition of my employment.

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A handwritten signature in black ink, appearing to read "Jordan Francisco", written over a horizontal line.

Signature over Printed Name



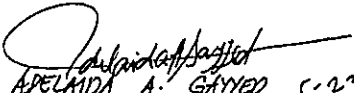
Benguet Corporation

Benguet District Operation
Balatoc, Itogon, Benguet

Acknowledgement of Benguet Corporation's Employee Conduct and Discipline (BECD)

I have read and been informed about the content, requirements, and expectations of Benguet Corporation's Employee Conduct and Discipline (BECD). I have received a copy and agree to abide by the same as a condition of my employment.

I understand that if I have questions, at any time, regarding the BECD, I will consult with my immediate supervisor or the office of the Human Resources Department.


ARELINDA A. GAYED 5-22-2022

Signature over Printed Name



Benguet Corp.

Benguet District Operation
Salatoc, Itagon, Benguet

Acknowledgement of Benguet Corporation's Employee Conduct and Discipline (BECD)

I have read and been informed about the content, requirements, and expectations of Benguet Corporation's Employee Conduct and Discipline (BECD). I have received a copy and agree to abide by the same as a condition of my employment.

I understand that if I have questions, at any time, regarding the BECD, I will consult with my immediate supervisor or the office of the Human Resources Department.



Signature over Printed Name



Benguet Corp.

Benguet District Operation
Balatoc, Ilagon, Benguet

Acknowledgement of Benguet Corporation's Employee Conduct and Discipline (BECD)

I have read and been informed about the content, requirements, and expectations of Benguet Corporation's Employee Conduct and Discipline (BECD). I have received a copy and agree to abide by the same as a condition of my employment.

I understand that if I have questions, at any time, regarding the BECD, I will consult with my immediate supervisor or the office of the Human Resources Department.

Romster Quiniones
ROMSTER QUINIONES

Signature over Printed Name



Benguet Corp.

Benguet District Operation
Balatoc, Itogon, Benguet

Acknowledgement of Benguet Corporation's Employee Conduct and Discipline (BECD)

I have read and been informed about the content, requirements, and expectations of Benguet Corporation's Employee Conduct and Discipline (BECD). I have received a copy and agree to abide by the same as a condition of my employment.

I understand that if I have questions, at any time, regarding the BECD, I will consult with my immediate supervisor or the office of the Human Resources Department.


MARY MAINE M. MARIAM

Signature over Printed Name



BenguetCorp

Benguet District Operation
Baiatoc, Ilogon, Benguet

**Acknowledgement of Benguet Corporation's
Employee Conduct and Discipline (BECD)**

I have read and been informed about the content, requirements, and expectations of Benguet Corporation's Employee Conduct and Discipline (BECD). I have received a copy and agree to abide by the same as a condition of my employment.

I understand that if I have questions, at any time, regarding the BECD, I will consult with my immediate supervisor or the office of the Human Resources Department.


M. L. BAGAÑA II

Signature over Printed Name



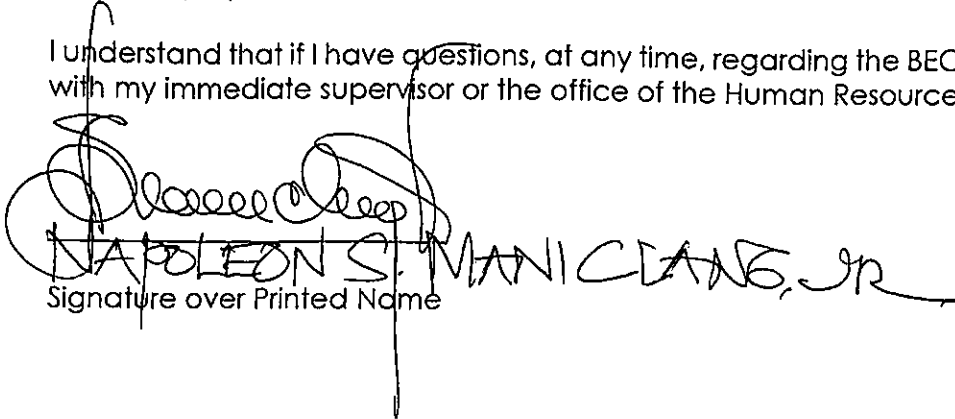
Benguet Corp.

Benguet District Operation
Balatoc, Ilogon, Benguet

Acknowledgement of Benguet Corporation's Employee Conduct and Discipline (BECD)

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I understand that if I have questions, at any time, regarding the BECD, I will consult with my immediate supervisor or the office of the Human Resources Department.


Signature over Printed Name



BENGUET DISTRICT OPERATIONS
DISPATCHING SLIP

Name: CANNANAN, MIKE A.
Position: NM - MINEGR
Department: MINE OPERATIONS
Employee No.: 11745
BDO ACCOUNT NO: 0054 7000 1459

1. BC COMPANY PHYSICIAN
 MEDICALLY FIT TO WORK
 NOT MEDICALLY FIT TO WORK
Roby M. Sison MD 3/21/21
Company Physician Date

2. SECURITY DEPARTMENT
 NO CASE IN FILE
 WITH CASE IN FILE
Roby M. Sison 03-30-21
Security Manager Date

3. TIME OFFICE & BIOMETRICS
 EMPLOYEE IS INCLUDED TO PAYROLL LIST
Roby M. Sison 3/21/21
Signature Date
 SCANNED FOR BIOMETRICS

4. CAMP ADMINISTRATION DEPARTMENT
 ORIENTATION ON CAMP RULES & REG.
 STAY IN CAMP
 OUT OF CAMP
Roby M. Sison 03-31-2021
Camp Admin Manager Date

5. HUMAN RESOURCE DEPARTMENT
 EMPLOYMENT ORIENTATION
 EMPLOYEE CONDUCT
Roby M. Sison Discipline
HR Manager Date

6. EMS OFFICE
 ORIENTATION ON EMS
Roby M. Sison 3/21/21
Signature Date

7. SAFETY DEPARTMENT
 SAFETY ORIENTATION & LECTURES
Roby M. Sison 03-31-21
Safety Manager Date

8. DEPARTMENT TO RECEIVE NEW EMPLOYEE
 JOB ORIENTATION
Date to start work: 3-21-21
Roby M. Sison 3-1-21
Department Head Date

NOTE: PLEASE RETURN THIS SLIP IMMEDIATELY TO HUMAN RESOURCE OFFICE



BENGUET DISTRICT OPERATIONS
DISPATCHING SLIP

Name: CABRERA, AVELINO O.
Position: MECHANIC HELPER
Department: MILL MECHANICAL
Employee No.: 11745
BDO ACCOUNT NO: 0054 7000 1459

1. BC COMPANY PHYSICIAN
 MEDICALLY FIT TO WORK
 NOT MEDICALLY FIT TO WORK
Roby M. Sison MD 4/14/21
Company Physician Date

2. SECURITY DEPARTMENT
 NO CASE IN FILE
 WITH CASE IN FILE
Roby M. Sison 04-14-21
Security Manager Date

3. TIME OFFICE & BIOMETRICS
 EMPLOYEE IS INCLUDED TO PAYROLL LIST
Roby M. Sison 4/14/21
Signature Date
 SCANNED FOR BIOMETRICS
Roby M. Sison 4/14/21
Signature Date

4. CAMP ADMINISTRATION DEPARTMENT
 ORIENTATION ON CAMP RULES & REG.
 STAY IN CAMP
 OUT OF CAMP
Roby M. Sison 4/15/2021
Camp Admin Manager Date

5. HUMAN RESOURCE DEPARTMENT
 EMPLOYMENT ORIENTATION
 EMPLOYEE CONDUCT
Roby M. Sison Discipline
HR Manager Date

6. EMS OFFICE
 ORIENTATION ON EMS
Roby M. Sison 4/15/21
Signature Date

7. SAFETY DEPARTMENT
 SAFETY ORIENTATION & LECTURES
Roby M. Sison 04/15/21
Safety Manager Date

8. DEPARTMENT TO RECEIVE NEW EMPLOYEE
 JOB ORIENTATION
Date to start work: 04/10/2021
Roby M. Sison 04/17/21
Department Head Date

NOTE: PLEASE RETURN THIS SLIP IMMEDIATELY TO HUMAN RESOURCE OFFICE



BENGUET DISTRICT OPERATIONS
DISPATCHING SLIP

Name: BALAN, JOHN JIMLANI A.
Position: NM - WELDER
Department: MINE MECHANICAL
Employee No.: 11770
BDO ACCOUNT NO: 0054 7004 4520

1. BC COMPANY PHYSICIAN
 MEDICALLY FIT TO WORK
 NOT MEDICALLY FIT TO WORK
Roby M. Sison MD 3/21/21
Company Physician Date

2. SECURITY DEPARTMENT
 NO CASE IN FILE
 WITH CASE IN FILE
Roby M. Sison 3/21/21
Security Manager Date

3. TIME OFFICE & BIOMETRICS
 EMPLOYEE IS INCLUDED TO PAYROLL LIST
Roby M. Sison 3/21/21
Signature Date
 SCANNED FOR BIOMETRICS
Roby M. Sison 01/01/21
Signature Date

4. CAMP ADMINISTRATION DEPARTMENT
 ORIENTATION ON CAMP RULES & REG.
 STAY IN CAMP
 OUT OF CAMP
Roby M. Sison 3/21/2021
Camp Admin Manager Date

5. HUMAN RESOURCE DEPARTMENT
 EMPLOYMENT ORIENTATION
 EMPLOYEE CONDUCT
Roby M. Sison Discipline
HR Manager Date

6. EMS OFFICE
 ORIENTATION ON EMS
Roby M. Sison 3/21/2021
Signature Date

7. SAFETY DEPARTMENT
 SAFETY ORIENTATION & LECTURES
Roby M. Sison 3/21/21
Safety Manager Date

8. DEPARTMENT TO RECEIVE NEW EMPLOYEE
 JOB ORIENTATION
Date to start work: 03-09-2021
Roby M. Sison 03-04-2021
Department Head Date

NOTE: PLEASE RETURN THIS SLIP IMMEDIATELY TO HUMAN RESOURCE OFFICE

105

Benguet Corp
BENGUET DISTRICT OPERATIONS
DISPATCHING SLIP

Name: ATINAC, MARICELDA D.

Position: NM- BOGEGUARD

Department: MINE OPERATIONS

Employee No.: 11708

BDO ACCOUNT NO: 0054 7006 7287

1. BC COMPANY PHYSICIAN
 MEDICALLY FIT TO WORK
 NOT MEDICALLY FIT TO WORK
 Signature: [Signature] Date: 7/15/21
 Company Physician

2. SECURITY DEPARTMENT
 NO CASE IN FILE
 WITH CASE IN FILE
 Signature: [Signature] Date: 07-15-21
 Security Manager

3. TIME OFFICE & BIOMETRICS
 EMPLOYEE IS INCLUDED TO PAYROLL LIST
 Signature: [Signature] Date: 7/14/21
 SCANNED FOR BIOMETRICS
 Signature: [Signature] Date: 7-14-21

4. CAMP ADMINISTRATION DEPARTMENT
 ORIENTATION ON CAMP RULES & REG.
 STAY IN CAMP
 OUT OF CAMP
 Signature: [Signature] Date: 7/14/2021
 Camp Admin Manager

5. HUMAN RESOURCE DEPARTMENT
 EMPLOYMENT ORIENTATION
 EMPLOYEE CONDUCT
 DISCIPLINE
 Signature: [Signature] Date: 07/09/2021
 HR Manager

6. EMS OFFICE
 ORIENTATION ON EMS
 Signature: [Signature] Date: July 14, 2021

7. SAFETY DEPARTMENT
 SAFETY ORIENTATION & LECTURES
 Signature: [Signature] Date: 07/17/21
 Safety Manager

8. DEPARTMENT TO RECEIVE NEW EMPLOYEE
 JOB ORIENTATION
 Date to start work: 7/14/21
[Signature] Date: 7/20/21
 Department Head

NOTE: PLEASE RETURN THIS SLIP IMMEDIATELY TO HUMAN RESOURCE OFFICE

Benguet Corp
BENGUET DISTRICT OPERATIONS
DISPATCHING SLIP

Name: TOYOG, ALLAN RAY R.

Position: WARRIOTE CLERK

Department: WMAENORAGE

Employee No.: 11744

BDO ACCOUNT NO: 0054 7006 1734

1. BC COMPANY PHYSICIAN
 MEDICALLY FIT TO WORK
 NOT MEDICALLY FIT TO WORK
 Signature: [Signature] Date: 07/05/21
 Company Physician

2. SECURITY DEPARTMENT
 NO CASE IN FILE
 WITH CASE IN FILE
 Signature: [Signature] Date: 07-05-21
 Security Manager

3. TIME OFFICE & BIOMETRICS
 EMPLOYEE IS INCLUDED TO PAYROLL LIST
 Signature: [Signature] Date: 7/5/21
 SCANNED FOR BIOMETRICS
 Signature: [Signature] Date: 4/5/21

4. CAMP ADMINISTRATION DEPARTMENT
 ORIENTATION ON CAMP RULES & REG.
 STAY IN CAMP
 OUT OF CAMP
 Signature: [Signature] Date: 7/5/21
 Camp Admin Manager

5. HUMAN RESOURCE DEPARTMENT
 EMPLOYMENT ORIENTATION
 EMPLOYEE CONDUCT
 DISCIPLINE
 Signature: [Signature] Date: 07/05/2021
 HR Manager

6. EMS OFFICE
 ORIENTATION ON EMS
 Signature: [Signature] Date: 7/5/21

7. SAFETY DEPARTMENT
 SAFETY ORIENTATION & LECTURES
 Signature: [Signature] Date: 07-05-21
 Safety Manager

8. DEPARTMENT TO RECEIVE NEW EMPLOYEE
 JOB ORIENTATION
 Date to start work: April 5, 2021
[Signature] Date: 4/5/21
 Department Head

NOTE: PLEASE RETURN THIS SLIP IMMEDIATELY TO HUMAN RESOURCE OFFICE

GATEPASS
13983

Benguet Corp
BENGUET DISTRICT OPERATIONS
DISPATCHING SLIP

Name: MANTIMIO, DANNY A.

Position: NM- MINER

Department: MINE OPERATIONS

Employee No.: 11701

BDO ACCOUNT NO: 0054 7006 7252

1. BC COMPANY PHYSICIAN
 MEDICALLY FIT TO WORK
 NOT MEDICALLY FIT TO WORK
 Signature: [Signature] Date: 7/6/21
 Company Physician

2. SECURITY DEPARTMENT
 NO CASE IN FILE
 WITH CASE IN FILE
 Signature: [Signature] Date: 07-06-21
 Security Manager

3. TIME OFFICE & BIOMETRICS
 EMPLOYEE IS INCLUDED TO PAYROLL LIST
 Signature: [Signature] Date: 7/6/21
 SCANNED FOR BIOMETRICS
 Signature: _____ Date: _____

4. CAMP ADMINISTRATION DEPARTMENT
 ORIENTATION ON CAMP RULES & REG.
 STAY IN CAMP
 OUT OF CAMP
 Signature: [Signature] Date: 7-6-21
 Camp Admin Manager

5. HUMAN RESOURCE DEPARTMENT
 EMPLOYMENT ORIENTATION
 EMPLOYEE CONDUCT
 DISCIPLINE
 Signature: [Signature] Date: 07/06/2021
 HR Manager

6. EMS OFFICE
 ORIENTATION ON EMS
 Signature: [Signature] Date: 7/6/2021

7. SAFETY DEPARTMENT
 SAFETY ORIENTATION & LECTURES
 Signature: [Signature] Date: 7/6/2021
 Safety Manager

8. DEPARTMENT TO RECEIVE NEW EMPLOYEE
 JOB ORIENTATION
 Date to start work: 7/7/21
[Signature] Date: 7/6/21
 Department Head

NOTE: PLEASE RETURN THIS SLIP IMMEDIATELY TO HUMAN RESOURCE OFFICE



BENGUET DISTRICT OPERATIONS
DISPATCHING SUP

Name: GUIER, GEL ARIANNE D.
 Position: NURSE
 Department: MEDICAL
 Employee No.: 11709
 BDO ACCOUNT NO.: 0054 7026 7272

1. BC COMPANY PHYSICIAN
 MEDICALLY FIT TO WORK
 NOT MEDICALLY FIT TO WORK
 Signature: [Signature] Date: 7/16/21
 Company Physician

2. SECURITY DEPARTMENT
 NO CASE IN FILE
 WITH CASE IN FILE
 Signature: [Signature] Date: 07-16-21
 Security Manager

3. TIME OFFICE & BIOMETRICS
 EMPLOYEE IS INCLUDED TO PAYROLL LIST
 NOT INCLUDED FOR BIOMETRICS
 Signature: [Signature] Date: 7/17/21
 Signature: [Signature] Date: 7/17/21

4. CAMP ADMINISTRATION DEPARTMENT
 ORIENTATION ON CAMP RULES & REG.
 STAY IN CAMP
 OUT OF CAMP
 Signature: [Signature] Date: 7-17-2021
 Camp Admin Manager

5. HUMAN RESOURCE DEPARTMENT
 EMPLOYMENT ORIENTATION
 Employee Conduct & Discipline
 Signature: [Signature] Date: _____
 HR Manager

6. EMS OFFICE
 ORIENTATION ON EMS
 Signature: [Signature] Date: 7/17/21

7. SAFETY DEPARTMENT
 SAFETY ORIENTATION & LECTURES
 Signature: [Signature] Date: 07-16-21
 Safety Manager

8. DEPARTMENT TO RECEIVE NEW EMPLOYEE
 JOB ORIENTATION
 Date to start work: July 16, 2021
 Department Head _____ Date _____

NOTE: PLEASE RETURN THIS SLIP IMMEDIATELY TO
HUMAN RESOURCE OFFICE



BENGUET DISTRICT OPERATIONS
DISPATCHING SUP

Name: LUZALA, GLEND C.
 Position: MIN-SAMPLER
 Department: MINING GEOLOGY
 Employee No.: 11751
 BDO ACCOUNT NO.: _____

1. BC COMPANY PHYSICIAN
 MEDICALLY FIT TO WORK
 NOT MEDICALLY FIT TO WORK
 Signature: [Signature] Date: 7/21/21
 Company Physician

2. SECURITY DEPARTMENT
 NO CASE IN FILE
 WITH CASE IN FILE
 Signature: [Signature] Date: 09-26-21
 Security Manager

3. TIME OFFICE & BIOMETRICS
 EMPLOYEE IS INCLUDED TO PAYROLL LIST
 NOT INCLUDED FOR BIOMETRICS
 Signature: [Signature] Date: 9/27/21
 Signature: [Signature] Date: 11/21/21

4. CAMP ADMINISTRATION DEPARTMENT
 ORIENTATION ON CAMP RULES & REG.
 STAY IN CAMP
 OUT OF CAMP
 Signature: [Signature] Date: 11/21/2021
 Camp Admin Manager

5. HUMAN RESOURCE DEPARTMENT
 EMPLOYMENT ORIENTATION
 Employee Conduct & Discipline
 Signature: [Signature] Date: 06/22/2021
 HR Manager

6. EMS OFFICE
 ORIENTATION ON EMS
 Signature: [Signature] Date: 7/20/21

7. SAFETY DEPARTMENT
 SAFETY ORIENTATION & LECTURES
 Signature: [Signature] Date: 04/21/21
 Safety Manager

8. DEPARTMENT TO RECEIVE NEW EMPLOYEE
 JOB ORIENTATION
 Date to start work: 04/28/21 this includes medical and safety orientation
 Department Head [Signature] Date: 04/29/21

NOTE: PLEASE RETURN THIS SLIP IMMEDIATELY TO
HUMAN RESOURCE OFFICE



BENGUET DISTRICT OPERATIONS
DISPATCHING SUP

Name: RYAN KINGS-XENILAR
 Position: CRUSHER OPERATOR
 Department: MILL
 Employee No.: 11700
 BDO ACCOUNT NO.: 0054 7026 7264

1. BC COMPANY PHYSICIAN
 MEDICALLY FIT TO WORK
 NOT MEDICALLY FIT TO WORK
 Signature: [Signature] Date: 7/17/21
 Company Physician

2. SECURITY DEPARTMENT
 NO CASE IN FILE
 WITH CASE IN FILE
 Signature: [Signature] Date: 07-16-21
 Security Manager

3. TIME OFFICE & BIOMETRICS
 EMPLOYEE IS INCLUDED TO PAYROLL LIST
 NOT INCLUDED FOR BIOMETRICS
 Signature: [Signature] Date: 7/16/21
 Signature: [Signature] Date: 7/17/21

4. CAMP ADMINISTRATION DEPARTMENT
 ORIENTATION ON CAMP RULES & REG.
 STAY IN CAMP
 OUT OF CAMP
 Signature: [Signature] Date: 7-13-2021
 Camp Admin Manager

5. HUMAN RESOURCE DEPARTMENT
 EMPLOYMENT ORIENTATION
 Employee Conduct & Discipline
 Signature: [Signature] Date: 07/16/2021
 HR Manager

6. EMS OFFICE
 ORIENTATION ON EMS
 Signature: [Signature] Date: 07/16/2021

7. SAFETY DEPARTMENT
 SAFETY ORIENTATION & LECTURES
 Signature: [Signature] Date: 07/16/21
 Safety Manager

8. DEPARTMENT TO RECEIVE NEW EMPLOYEE
 JOB ORIENTATION
 Date to start work: 7/17/2021
 Department Head [Signature] Date: 7/16/2021

NOTE: PLEASE RETURN THIS SLIP IMMEDIATELY TO
HUMAN RESOURCE OFFICE



BENGUET DISTRICT OPERATIONS
DISPATCHING SLIP

Name: CANUDO, ALEX JR. G.
Position: AUNA - CONSTRUCTION CIVIL WORK
Department: CONSTRUCTION
Employee No: 11765

1. BC COMPANY PHYSICIAN
 MEDICALLY FIT TO WORK
 NOT MEDICALLY FIT TO WORK
Date: 7/13/21
Company Physician

2. SECURITY DEPARTMENT
 NO CASE IN FILE
 WITH CASE IN FILE
Date: 07-13-21
Security Manager

3. TIME OFFICE & BIOMETRICS
 EMPLOYEE IS INCLUDED TO PAYROLL LIST
Signature: [Signature] Date: 7-13-21
 EMPLOYEE IS EXEMPT FOR BIOMETRICS
Signature: [Signature] Date: 7/13/2021

4. CAMP ADMINISTRATION DEPARTMENT
 ORIENTATION ON CAMP RULES & REG.
 STAY IN CAMP
 OUT OF CAMP
Date: 7/13/21
Camp Admin Manager

5. HUMAN RESOURCE DEPARTMENT
 EMPLOYMENT ORIENTATION
Date: JULY 13, 2021
HR Manager

6. EMS OFFICE
 ORIENTATION ON EMS
Signature: [Signature] Date: July 13, 2021

7. SAFETY DEPARTMENT
 SAFETY ORIENTATION & LECTURES
Signature: [Signature] Date: 07/13/21
Safety Manager

8. DEPARTMENT TO RECEIVE NEW EMPLOYEE
 JOB ORIENTATION
Date to start work: 7/13/21
Date: 7/13/21
Department Head

NOTE: PLEASE RETURN THIS SLIP IMMEDIATELY TO HUMAN RESOURCE OFFICE



BENGUET DISTRICT OPERATIONS
DISPATCHING SLIP

Name: CANUDO, ELFINO C.
Position: REFINERY WIDE
Department: MILL - REFINERY
Employee No: 11767

1. BC COMPANY PHYSICIAN
 MEDICALLY FIT TO WORK
 NOT MEDICALLY FIT TO WORK
Date: 7/10/21
Company Physician

2. SECURITY DEPARTMENT
 NO CASE IN FILE
 WITH CASE IN FILE
Date: 07-14-21
Security Manager

3. TIME OFFICE & BIOMETRICS
 EMPLOYEE IS INCLUDED TO PAYROLL LIST
Signature: [Signature] Date: 7/14/21
 EMPLOYEE IS EXEMPT FOR BIOMETRICS
Signature: [Signature] Date: 07-14-21

4. CAMP ADMINISTRATION DEPARTMENT
 ORIENTATION ON CAMP RULES & REG.
 STAY IN CAMP
 OUT OF CAMP
Date: 7-16-2021
Camp Admin Manager

5. HUMAN RESOURCE DEPARTMENT
 EMPLOYMENT ORIENTATION
Date: 07/16/2021
HR Manager

6. EMS OFFICE
 ORIENTATION ON EMS
Signature: [Signature] Date: 7/14/2021

7. SAFETY DEPARTMENT
 SAFETY ORIENTATION & LECTURES
Signature: [Signature] Date: 7/16/21
Safety Manager

8. DEPARTMENT TO RECEIVE NEW EMPLOYEE
 JOB ORIENTATION
Date to start work: 7/17/2021
Date: 7/16/2021
Department Head

NOTE: PLEASE RETURN THIS SLIP IMMEDIATELY TO HUMAN RESOURCE OFFICE



BENGUET DISTRICT OPERATIONS
DISPATCHING SLIP

Name: ESPERANZATE, PAUL GABRIELLE
Position: MILL SHIFT SUPERVISOR
Department: MILL OPERATIONS
Employee No: 11763

1. BC COMPANY PHYSICIAN
 MEDICALLY FIT TO WORK
 NOT MEDICALLY FIT TO WORK
Date: 7/10/21
Company Physician

2. SECURITY DEPARTMENT
 NO CASE IN FILE
 WITH CASE IN FILE
Date: 07-10-21
Security Manager

3. TIME OFFICE & BIOMETRICS
 EMPLOYEE IS INCLUDED TO PAYROLL LIST
Signature: [Signature] Date: 7/10/21
 EMPLOYEE IS EXEMPT FOR BIOMETRICS
Signature: [Signature] Date: 7/10/21

4. CAMP ADMINISTRATION DEPARTMENT
 ORIENTATION ON CAMP RULES & REG.
 STAY IN CAMP (Schedule Exact House)
 OUT OF CAMP
Date: 7/10/2021
Camp Admin Manager

5. HUMAN RESOURCE DEPARTMENT
 EMPLOYMENT ORIENTATION
Date: 07/10/2021
HR Manager

6. EMS OFFICE
 ORIENTATION ON EMS
Signature: [Signature] Date: 07/10/2021

7. SAFETY DEPARTMENT
 SAFETY ORIENTATION & LECTURES
Signature: [Signature] Date: 7/10/2021
Safety Manager

8. DEPARTMENT TO RECEIVE NEW EMPLOYEE
 JOB ORIENTATION
Date to start work: July 10, 2021
Date: 10 July 2021
Department Head

NOTE: PLEASE RETURN THIS SLIP IMMEDIATELY TO HUMAN RESOURCE OFFICE



BENGUET DISTRICT OPERATIONS
DISPATCHING SLIP

Name: BANHOT, CARLOS JR. P.
Position: MM - MINER
Department: MINE OPERATIONS
Employee No.: 11720

800 ACCOUNT No: COSE 7052 5777

1. BC COMPANY PHYSICIAN
 MEDICALLY FIT TO WORK
 NOT MEDICALLY FIT TO WORK
Date: 11/7/21

2. SECURITY DEPARTMENT
 NO CASE IN FILE
 WITH CASE IN FILE
Date: 01/07/21

3. TIME OFFICE & BIOMETRICS
 EMPLOYEE IS INCLUDED TO PAYROLL LIST
Date: 11/8/20

4. CAMP ADMINISTRATION DEPARTMENT
 ORIENTATION ON CAMP RULES & REG.
 STAY IN CAMP
 OUT OF CAMP
Date: 01-7-2021

5. HUMAN RESOURCE DEPARTMENT
 EMPLOYMENT ORIENTATION
 Employee Conduct
 Discipline
Date: 01/07/21

6. EMS OFFICE
 ORIENTATION ON EMS
Date: 11/2/20

7. SAFETY DEPARTMENT
 SAFETY ORIENTATION & LECTURES
Date: 11/3/20

8. DEPARTMENT TO RECEIVE NEW EMPLOYEE
 JOB ORIENTATION
Date to start work: 01/11/21

Department Head: [Signature] Date: 11/7/21

NOTE: PLEASE RETURN THIS SLIP IMMEDIATELY TO HUMAN RESOURCE OFFICE



BENGUET DISTRICT OPERATIONS
DISPATCHING SLIP

Name: BENDO, JOSHUA E.
Position: SAFETY INSPECTOR
Department: SAFETY
Employee No.: 11784

800 ACCOUNT No: COSE 7044 7494

1. BC COMPANY PHYSICIAN
 MEDICALLY FIT TO WORK
 NOT MEDICALLY FIT TO WORK
Date: 09/17/2021

2. SECURITY DEPARTMENT
 NO CASE IN FILE
 WITH CASE IN FILE
Date: 01/17/21

3. TIME OFFICE & BIOMETRICS
 EMPLOYEE IS INCLUDED TO PAYROLL LIST
Date: 9/17/2021

4. CAMP ADMINISTRATION DEPARTMENT
 ORIENTATION ON CAMP RULES & REG.
 STAY IN CAMP
 OUT OF CAMP
Date: 01/17/21

5. HUMAN RESOURCE DEPARTMENT
 EMPLOYMENT ORIENTATION
 Employee Conduct
 Discipline
Date: 9/17/2021

6. EMS OFFICE
 ORIENTATION ON EMS
Date: 9/17/2021

7. SAFETY DEPARTMENT
 SAFETY ORIENTATION & LECTURES
Date: 09/17/21

8. DEPARTMENT TO RECEIVE NEW EMPLOYEE
 JOB ORIENTATION
Date to start work: 09/17/21

Department Head: [Signature] Date: 09/17/21

NOTE: PLEASE RETURN THIS SLIP IMMEDIATELY TO HUMAN RESOURCE OFFICE



BENGUET DISTRICT OPERATIONS
DISPATCHING SLIP

Name: CABREROS, KENNY M.
Position: MONITORING CABIN
Department: MINE OPERATIONS
Employee No.: 11790

800 ACCOUNT No: COSE 7052 174

1. BC COMPANY PHYSICIAN
 MEDICALLY FIT TO WORK
 NOT MEDICALLY FIT TO WORK
Date: 11/24/21

2. SECURITY DEPARTMENT
 NO CASE IN FILE
 WITH CASE IN FILE
Date: 11/16/21

3. TIME OFFICE & BIOMETRICS
 EMPLOYEE IS INCLUDED TO PAYROLL LIST
Date: 10/16/21

4. CAMP ADMINISTRATION DEPARTMENT
 ORIENTATION ON CAMP RULES & REG.
 STAY IN CAMP
 OUT OF CAMP
Date: 11/16/21

5. HUMAN RESOURCE DEPARTMENT
 EMPLOYMENT ORIENTATION
 Employee Conduct
 Discipline
Date: 10/16/2021

6. EMS OFFICE
 ORIENTATION ON EMS
Date: 10/16/21

7. SAFETY DEPARTMENT
 SAFETY ORIENTATION & LECTURES
Date: 11/16/21

8. DEPARTMENT TO RECEIVE NEW EMPLOYEE
 JOB ORIENTATION
Date to start work: 10/16/21

Department Head: [Signature] Date: 10/16/21

NOTE: PLEASE RETURN THIS SLIP IMMEDIATELY TO HUMAN RESOURCE OFFICE

Banquet Corp
BANGQUET DISTRICT OPERATIONS
DISPATCHING SLIP

Name: YAGOS, NILES LARRY L.

Position: MINER

Department: MINING OPERATIONS

Employee No.: 11731

BCO ACCOUNT NO.: 0054 7005 CUB

1. BC COMPANY PHYSICIAN
 MEDICALLY FIT TO WORK
 NOT MEDICALLY FIT TO WORK
 Name of BC Physician [Signature] Date 1/19/21
 Company Physician

2. SECURITY DEPARTMENT
 NO CASE IN FILE
 WITH CASE IN FILE
 Name of Security Manager [Signature] Date 01-16-21
 Security Manager

3. TIME OFFICE & BIOMETRICS
 EMPLOYEE IS INCLUDED TO PAYROLL LIST
 NOT INCLUDED TO PAYROLL LIST
 Signature [Signature] Date 1/19/21
 SCANNED FOR BIOMETRICS
 Signature _____ Date _____

4. CAMP ADMINISTRATION DEPARTMENT
 ORIENTATION ON CAMP RULES & REG.
 STAY IN CAMP
 OUT OF CAMP DATIONS
 Name of Camp Admin Manager [Signature] Date 01/16/21
 Camp Admin Manager

5. HUMAN RESOURCE DEPARTMENT
 EMPLOYMENT ORIENTATION
 EMPLOYEE CONDUCT & DISCIPLINE
 Name of HR Manager [Signature] Date _____
 HR Manager

6. EMS OFFICE
 ORIENTATION ON EMS
 Signature [Signature] Date 1/16/21
 Signature _____ Date _____

7. SAFETY DEPARTMENT
 SAFETY ORIENTATION & LECTURES
 Name of Safety Manager [Signature] Date 01/16/21
 Safety Manager

8. DEPARTMENT TO RECEIVE NEW EMPLOYEE
 JOB ORIENTATION
 Date to start work: 1/18/21
 DEPARTMENT HEAD
 Name of Department Head [Signature] Date 1/16/21
 Department Head

NOTE: PLEASE RETURN THIS SLIP IMMEDIATELY TO HUMAN RESOURCE OFFICE

Banquet Corp
BANGQUET DISTRICT OPERATIONS
DISPATCHING SLIP

Name: SUN, ALVIN CAYLE P.

Position: NM- BODEGUERO

Department: MINING OPERATIONS

Employee No.: 11770

BCO ACCOUNT NO.: _____

1. BC COMPANY PHYSICIAN
 MEDICALLY FIT TO WORK
 NOT MEDICALLY FIT TO WORK
 Name of BC Physician [Signature] Date 07/19/21
 Company Physician

2. SECURITY DEPARTMENT
 NO CASE IN FILE
 WITH CASE IN FILE
 Name of Security Manager [Signature] Date 07-19-21
 Security Manager

3. TIME OFFICE & BIOMETRICS
 EMPLOYEE IS INCLUDED TO PAYROLL LIST
 NOT INCLUDED TO PAYROLL LIST
 Signature [Signature] Date 7/19/21
 SCANNED FOR BIOMETRICS
 Signature [Signature] Date 7/21/21

4. CAMP ADMINISTRATION DEPARTMENT
 ORIENTATION ON CAMP RULES & REG.
 STAY IN CAMP
 OUT OF CAMP
 Name of Camp Admin Manager [Signature] Date 7/19/2021
 Camp Admin Manager

5. HUMAN RESOURCE DEPARTMENT
 EMPLOYMENT ORIENTATION
 EMPLOYEE CONDUCT & DISCIPLINE
 Name of HR Manager [Signature] Date July 21, 2021
 HR Manager

6. EMS OFFICE
 ORIENTATION ON EMS
 Signature [Signature] Date 7/19/21
 Signature _____ Date _____

7. SAFETY DEPARTMENT
 SAFETY ORIENTATION & LECTURES
 Name of Safety Manager [Signature] Date 07/19/21
 Safety Manager

8. DEPARTMENT TO RECEIVE NEW EMPLOYEE
 JOB ORIENTATION
 Date to start work: 7/21/21
 DEPARTMENT HEAD
 Name of Department Head [Signature] Date 7/19/21
 Department Head

NOTE: PLEASE RETURN THIS SLIP IMMEDIATELY TO HUMAN RESOURCE OFFICE

Banquet Corp
BANGQUET DISTRICT OPERATIONS
DISPATCHING SLIP

Name: BANGADET, KYLA F.

Position: MINING ETGR. TRAINEE

Department: MINING ENGG.

Employee No.: 11702

BCO ACCOUNT NO.: 0054 7039 949

1. BC COMPANY PHYSICIAN
 MEDICALLY FIT TO WORK
 NOT MEDICALLY FIT TO WORK
 Name of BC Physician [Signature] Date 9/14/21
 Company Physician

2. SECURITY DEPARTMENT
 NO CASE IN FILE
 WITH CASE IN FILE
 Name of Security Manager [Signature] Date 9/9/21
 Security Manager

3. TIME OFFICE & BIOMETRICS
 EMPLOYEE IS INCLUDED TO PAYROLL LIST
 NOT INCLUDED TO PAYROLL LIST
 Signature [Signature] Date 9/14/21
 SCANNED FOR BIOMETRICS
 Signature [Signature] Date 9/14/21

4. CAMP ADMINISTRATION DEPARTMENT
 ORIENTATION ON CAMP RULES & REG.
 STAY IN CAMP
 OUT OF CAMP
 Name of Camp Admin Manager [Signature] Date 9-14-2021
 Camp Admin Manager

5. HUMAN RESOURCE DEPARTMENT
 EMPLOYMENT ORIENTATION
 EMPLOYEE CONDUCT & DISCIPLINE
 Name of HR Manager [Signature] Date 9/8/2021
 HR Manager

6. EMS OFFICE
 ORIENTATION ON EMS
 Signature [Signature] Date 9/9/2021
 Signature _____ Date _____

7. SAFETY DEPARTMENT
 SAFETY ORIENTATION & LECTURES
 Name of Safety Manager [Signature] Date 9/9/21
 Safety Manager

8. DEPARTMENT TO RECEIVE NEW EMPLOYEE
 JOB ORIENTATION
 Date to start work: 10 Sep 21
 DEPARTMENT HEAD
 Name of Department Head [Signature] Date 10 Sep 21
 Department Head

NOTE: PLEASE RETURN THIS SLIP IMMEDIATELY TO HUMAN RESOURCE OFFICE



BENGUET DISTRICT OPERATIONS
DISPATCHING SLIP

Name: MANGANP, JOHN B.
Position: MUCKER
Department: MINE OPERATIONS
Employee No.: 11798

X# 0054-7007-2434

1. BC COMPANY PHYSICIAN
 MEDICALLY FIT TO WORK
 NOT MEDICALLY FIT TO WORK
Signature: [Signature] Date: 11/19/2021
Company Physician

2. SECURITY DEPARTMENT
 NO CASE IN FILE
 WITH CASE IN FILE
Signature: [Signature] Date: 11-18-21
Security Manager

3. TIME OFFICE & BIOMETRICS
 EMPLOYEE IS INCLUDED TO PAYROLL LIST
Signature: [Signature] Date: 11/19/21
 SCANNED FOR BIOMETRICS
Signature: [Signature] Date: 11/19/21

4. CAMP ADMINISTRATION DEPARTMENT
 ORIENTATION ON CAMP RULES & REG.
 STAY IN CAMP
 OUT OF CAMP
Signature: [Signature] Date: 11-19-2021
Camp Admin Manager

5. HUMAN RESOURCE DEPARTMENT
 EMPLOYMENT ORIENTATION
Signature: [Signature] Date: 11-18-21
HR Manager

6. EMS OFFICE
 ORIENTATION ON EMS
Signature: [Signature] Date: 11/19/21

7. SAFETY DEPARTMENT
 SAFETY ORIENTATION & LECTURES
Signature: [Signature] Date: 11/19/2021
Safety Manager

8. DEPARTMENT TO RECEIVE NEW EMPLOYEE
 JOB ORIENTATION
Date to start work: 11/20/21
Signature: [Signature] Date: 11/19/21
Department Head

NOTE: PLEASE RETURN THIS SLIP IMMEDIATELY TO HUMAN RESOURCE OFFICE



BENGUET DISTRICT OPERATIONS
DISPATCHING SLIP

Name: ROSARIO, ISMMEL JR. C.
Position: NM - MANAGER
Department: SECUR007
Employee No.: 10081

1. BC COMPANY PHYSICIAN
 MEDICALLY FIT TO WORK
 NOT MEDICALLY FIT TO WORK
Signature: [Signature] Date: 9/9/21
Company Physician

2. SECURITY DEPARTMENT
 NO CASE IN FILE
 WITH CASE IN FILE
Signature: [Signature] Date: [Date]
Security Manager

3. TIME OFFICE & BIOMETRICS
 EMPLOYEE IS INCLUDED TO PAYROLL LIST
Signature: [Signature] Date: 9/9/21
 SCANNED FOR BIOMETRICS
Signature: [Signature] Date: 9/9/2021

4. CAMP ADMINISTRATION DEPARTMENT
 ORIENTATION ON CAMP RULES & REG.
 STAY IN CAMP
 OUT OF CAMP
Signature: [Signature] Date: 9/9/2021
Camp Admin Manager

5. HUMAN RESOURCE DEPARTMENT
 EMPLOYMENT ORIENTATION
Signature: [Signature] Date: 9/8/21
HR Manager

6. EMS OFFICE
 ORIENTATION ON EMS
Signature: [Signature] Date: 9/8/21

7. SAFETY DEPARTMENT
 SAFETY ORIENTATION & LECTURES
Signature: [Signature] Date: 9/8/2021
Safety Manager

8. DEPARTMENT TO RECEIVE NEW EMPLOYEE
 JOB ORIENTATION
Date to start work: 09/08/21
Signature: [Signature] Date: 09/08/21
Department Head

NOTE: PLEASE RETURN THIS SLIP IMMEDIATELY TO HUMAN RESOURCE OFFICE



BENGUET DISTRICT OPERATIONS
DISPATCHING SLIP

Name: SADCAT, REYMA A.
Position: NURSE RELIEVER
Department: MEDICAL
Employee No.: 11708

1. BC COMPANY PHYSICIAN
 MEDICALLY FIT TO WORK
 NOT MEDICALLY FIT TO WORK
Signature: [Signature] Date: 9/15/21
Company Physician

2. SECURITY DEPARTMENT
 NO CASE IN FILE
 WITH CASE IN FILE
Signature: [Signature] Date: 09/16/21
Security Manager

3. TIME OFFICE & BIOMETRICS
 EMPLOYEE IS INCLUDED TO PAYROLL LIST
Signature: [Signature] Date: 9/16/2021
 SCANNED FOR BIOMETRICS
Signature: [Signature] Date: 9/17/21

4. CAMP ADMINISTRATION DEPARTMENT
 ORIENTATION ON CAMP RULES & REG.
 STAY IN CAMP
 OUT OF CAMP
Signature: [Signature] Date: 9/16/21
Camp Admin Manager

5. HUMAN RESOURCE DEPARTMENT
 EMPLOYMENT ORIENTATION
Signature: [Signature] Date: 9/16/2021
HR Manager

6. EMS OFFICE
 ORIENTATION ON EMS
Signature: [Signature] Date: 9/16/2021

7. SAFETY DEPARTMENT
 SAFETY ORIENTATION & LECTURES
Signature: [Signature] Date: 9/17/2021
Safety Manager

8. DEPARTMENT TO RECEIVE NEW EMPLOYEE
 JOB ORIENTATION
Date to start work: 9/19/21
Signature: [Signature] Date: [Date]
Department Head

NOTE: PLEASE RETURN THIS SLIP IMMEDIATELY TO HUMAN RESOURCE OFFICE



BENGUET DISTRICT OPERATIONS
DISPATCHING SLIP

Name: CHOCAY, JESSABEL B.
Position: MUCKER
Department: MINES
Employee No.: 11791

1. BC COMPANY PHYSICIAN
 MEDICALLY FIT TO WORK
 NOT MEDICALLY FIT TO WORK
Signature: [Signature] Date: 11/09/21
Company Physician

2. SECURITY DEPARTMENT
 NO CASE IN FILE
 WITH CASE IN FILE
Signature: [Signature] Date: 11/09/21
Security Manager

3. TIME OFFICE & BIOMETRICS
 EMPLOYEE IS INCLUDED TO PAYROLL LIST
Signature: [Signature] Date: 11/09/21
 SCANNED FOR BIOMETRICS
Signature: [Signature] Date: 11/09/21

4. CAMP ADMINISTRATION DEPARTMENT
 ORIENTATION ON CAMP RULES & REG.
 STAY IN CAMP
 OUT OF CAMP
Signature: [Signature] Date: 11-02-2021
Camp Admin Manager

5. HUMAN RESOURCE DEPARTMENT
 EMPLOYMENT ORIENTATION & Employee Conduct
Signature: [Signature] Date: 11/09/21
HR Manager

6. EMS OFFICE
 ORIENTATION ON EMS
Signature: [Signature] Date: 11-02-2021

7. SAFETY DEPARTMENT
 SAFETY ORIENTATION & LECTURES
Signature: [Signature] Date: 11/09/21
Safety Manager

8. DEPARTMENT TO RECEIVE NEW EMPLOYEE
 JOB ORIENTATION
Date to start work: 11/10/21
Signature: [Signature] Date: 11/09/21
Department Head

NOTE: PLEASE RETURN THIS SLIP IMMEDIATELY TO HUMAN RESOURCE OFFICE



BENGUET DISTRICT OPERATIONS
DISPATCHING SLIP

Name: CLAMAL, MARIO B.
Position: NM - MINER
Department: MINING OPERATIONS
Employee No.: 11762

1. BC COMPANY PHYSICIAN
 MEDICALLY FIT TO WORK
 NOT MEDICALLY FIT TO WORK
Signature: [Signature] Date: 7/7/21
Company Physician

2. SECURITY DEPARTMENT
 NO CASE IN FILE
 WITH CASE IN FILE
Signature: [Signature] Date: 07/07/21
Security Manager

3. TIME OFFICE & BIOMETRICS
 EMPLOYEE IS INCLUDED TO PAYROLL LIST
Signature: [Signature] Date: 7/7/21
 SCANNED FOR BIOMETRICS
Signature: [Signature] Date: 7/7/21

4. CAMP ADMINISTRATION DEPARTMENT
 ORIENTATION ON CAMP RULES & REG.
 STAY IN CAMP
 OUT OF CAMP
Signature: [Signature] Date: 7/7/21
Camp Admin Manager

5. HUMAN RESOURCE DEPARTMENT
 EMPLOYMENT ORIENTATION & Employee Conduct
Signature: [Signature] Date: 07/07/21
HR Manager

6. EMS OFFICE
 ORIENTATION ON EMS
Signature: [Signature] Date: 07/07/21

7. SAFETY DEPARTMENT
 SAFETY ORIENTATION & LECTURES
Signature: [Signature] Date: 7/7/21
Safety Manager

8. DEPARTMENT TO RECEIVE NEW EMPLOYEE
 JOB ORIENTATION
Date to start work: 7/8/21
Signature: [Signature] Date: 7/7/21
Department Head

NOTE: PLEASE RETURN THIS SLIP IMMEDIATELY TO HUMAN RESOURCE OFFICE



BENGUET DISTRICT OPERATIONS
DISPATCHING SLIP

Name: LOMASOR, JOSEPH A.
Position: NM - MUCKER
Department: MINING OPERATIONS
Employee No.: 11764

1. BC COMPANY PHYSICIAN
 MEDICALLY FIT TO WORK
 NOT MEDICALLY FIT TO WORK
Signature: [Signature] Date: 07/10/21
Company Physician

2. SECURITY DEPARTMENT
 NO CASE IN FILE
 WITH CASE IN FILE
Signature: [Signature] Date: 07-12-21
Security Manager

3. TIME OFFICE & BIOMETRICS
 EMPLOYEE IS INCLUDED TO PAYROLL LIST
Signature: [Signature] Date: 7/12/21
 SCANNED FOR BIOMETRICS
Signature: [Signature] Date: 7/12/21

4. CAMP ADMINISTRATION DEPARTMENT
 ORIENTATION ON CAMP RULES & REG.
 STAY IN CAMP
 OUT OF CAMP
Signature: [Signature] Date: 7-12-2021
Camp Admin Manager

5. HUMAN RESOURCE DEPARTMENT
 EMPLOYMENT ORIENTATION & Employee Conduct
Signature: [Signature] Date: July 12, 2021
HR Manager

6. EMS OFFICE
 ORIENTATION ON EMS
Signature: [Signature] Date: July 12, 2021

7. SAFETY DEPARTMENT
 SAFETY ORIENTATION & LECTURES
Signature: [Signature] Date: 07/12/21
Safety Manager

8. DEPARTMENT TO RECEIVE NEW EMPLOYEE
 JOB ORIENTATION
Date to start work: 7/16/21
Signature: [Signature] Date: 7/16/21
Department Head

NOTE: PLEASE RETURN THIS SLIP IMMEDIATELY TO HUMAN RESOURCE OFFICE

GP 19/27

Benquest Corp
BENQUEST DISTRICT OPERATIONS
DISPATCHING SLIP

Name: NGKANAY, LEVI G.
Position: NM - MUCKY
Department: MINE OPERATIONS
Employee No.: 11107
BDO ACCOUNT NO: _____

1. BC COMPANY PHYSICIAN BP: 180/130
 MEDICALLY FIT TO WORK
 NOT MEDICALLY FIT TO WORK
Company Physician: [Signature] Date: 7/21/21

2. SECURITY DEPARTMENT
 NO CASE IN FILE
 WITH CASE IN FILE
Security Manager: [Signature] Date: 07-19-21

3. TIME OFFICE & BIOMETRICS
 EMPLOYEE IS INCLUDED TO PAYROLL LIST
Signature: [Signature] Date: 7/19/21
 SCANNED FOR BIOMETRICS
Signature: [Signature] Date: 7/20/21

4. CAMP ADMINISTRATION DEPARTMENT
 ORIENTATION ON CAMP RULES & REG.
 STAY IN CAMP
 OUT OF CAMP
Camp Admin Manager: [Signature] Date: 7/19/21

5. HUMAN RESOURCE DEPARTMENT
 EMPLOYMENT ORIENTATION and discipline
HR Manager: [Signature] Date: 07/19/2021

6. EMS OFFICE
 ORIENTATION ON EMS
Signature: [Signature] Date: 7/20/21

7. SAFETY DEPARTMENT
 SAFETY ORIENTATION & LECTURES
Safety Manager: [Signature] Date: 07/22/21

8. DEPARTMENT TO RECEIVE NEW EMPLOYEE
 JOB ORIENTATION
Date to start work: 7/20/21
Department Head: [Signature] Date: 7/20/21

NOTE: PLEASE RETURN THIS SLIP IMMEDIATELY TO HUMAN RESOURCE OFFICE

Benquest Corp
BENQUEST DISTRICT OPERATIONS
DISPATCHING SLIP

Name: TAMANO, MELVIN S.
Position: INDUSTRIAL ELECTRICIAN
Department: ELECTRICAL
Employee No.: 10965
BDO ACCOUNT NO: 6054 7065 5947

1. BC COMPANY PHYSICIAN
 MEDICALLY FIT TO WORK
 NOT MEDICALLY FIT TO WORK
Company Physician: [Signature] Date: 1/15/21

2. SECURITY DEPARTMENT
 NO CASE IN FILE
 WITH CASE IN FILE
Security Manager: [Signature] Date: 01-11-21

3. TIME OFFICE & BIOMETRICS
 EMPLOYEE IS INCLUDED TO PAYROLL LIST
Signature: [Signature] Date: 1/11/21
 SCANNED FOR BIOMETRICS
Signature: [Signature] Date: 1/11/21

4. CAMP ADMINISTRATION DEPARTMENT
 ORIENTATION ON CAMP RULES & REG.
 STAY IN CAMP
 OUT OF CAMP
Camp Admin Manager: [Signature] Date: 1/11/21

5. HUMAN RESOURCE DEPARTMENT
 EMPLOYMENT ORIENTATION and discipline
HR Manager: [Signature] Date: Jan 11, 2021

6. EMS OFFICE
 ORIENTATION ON EMS
Signature: [Signature] Date: 1/11/2021

7. SAFETY DEPARTMENT
 SAFETY ORIENTATION & LECTURES
Safety Manager: [Signature] Date: 1/11/2021

8. DEPARTMENT TO RECEIVE NEW EMPLOYEE
 JOB ORIENTATION
Date to start work: 01-11-21
Department Head: [Signature] Date: 01-11-21

NOTE: PLEASE RETURN THIS SLIP IMMEDIATELY TO HUMAN RESOURCE OFFICE

4504

Benquest Corp
BENQUEST DISTRICT OPERATIONS
DISPATCHING SLIP

Name: CAYENHA, MICHAEL W.
Position: NM - MUCKER KIMPLER
Department: MINE GEOLOGY
Employee No.: 11740
BDO ACCOUNT NO: 6054 7066 1668

1. BC COMPANY PHYSICIAN BP: 120/90
 MEDICALLY FIT TO WORK
 NOT MEDICALLY FIT TO WORK
Company Physician: [Signature] Date: 9/20/21

2. SECURITY DEPARTMENT
 NO CASE IN FILE
 WITH CASE IN FILE
Security Manager: [Signature] Date: 09-20-21

3. TIME OFFICE & BIOMETRICS
 EMPLOYEE IS INCLUDED TO PAYROLL LIST
Signature: [Signature] Date: 9/20/21
 SCANNED FOR BIOMETRICS
Signature: [Signature] Date: 9/20/21

4. CAMP ADMINISTRATION DEPARTMENT
 ORIENTATION ON CAMP RULES & REG.
 STAY IN CAMP
 OUT OF CAMP
Camp Admin Manager: [Signature] Date: 9-22-21

5. HUMAN RESOURCE DEPARTMENT
 EMPLOYMENT ORIENTATION and discipline
HR Manager: [Signature] Date: 09/21/21

6. EMS OFFICE
 ORIENTATION ON EMS
Signature: [Signature] Date: 9/20/21

7. SAFETY DEPARTMENT
 SAFETY ORIENTATION & LECTURES
Safety Manager: [Signature] Date: 09/24/21

8. DEPARTMENT TO RECEIVE NEW EMPLOYEE
 JOB ORIENTATION
Date to start work: 09/26/21
Department Head: [Signature] Date: 09/24/21

NOTE: PLEASE RETURN THIS SLIP IMMEDIATELY TO HUMAN RESOURCE OFFICE

BENGUET CORPORATION
Internal Memorandum

October 12, 2011

To: OFFICERS AND ALL CONCERNED*
From: BPG ROMUALDEZ
Subject: PURCHASING AND BIDDING GUIDELINES

* DRB. RCS. BMA. RAC. MAB. SPP. RPM. RPJ. TDM. RBA. LSS.
MDDL. LGF. HHR. MDA. BCB. EMP. RPF. ARG. ALB. DJA. ILE

I. Creation of Contract, Purchasing, Bids and Awards Committee (CPBAC)

In order to improve monitoring and control of costs, a Contract, Purchasing, Bids and Awards Committee (CPBAC) is hereby formed which shall convene regularly as recommended or required by Purchasing group, by the concerned operations manager/s, or as determined by a majority of the members of the committee, or by its chairperson. The CPBAC shall review and approve or endorse for my approval the purchase of materials, equipment, supplies, and services, as well as all contracts pertaining to BC, BNMI, BLRI, BGRC and subsidiaries.

II. Composition of the CPBAC

Chairman: Rogelio C. Salazar
Members: Salvador P. Pabalan
Hemogene H. Real
Lina G. Fernandez

III. Voting/CPBAC Approval Process

The Purchasing or Operations group concerned shall present, recommend and justify to the CPBAC, the approval of contract or purchase of material/s, equipment, or service they require.

Only members of the above committees shall have voting power. A majority of the members of the committee shall constitute a quorum. The unanimous vote of the members present in a committee meeting shall constitute the decision of the committee. If no consensus is reached, the matter shall be referred to the undersigned for final decision. All proceedings of the CPBAC shall be reported to the undersigned.

The Purchasing group shall attend all meetings of the CPBAC and prepare the minutes of meeting for signature of all CPBAC members present at the meeting.

IV. Contract or CBP Preparation and Bidding

Company policy and procedures in the preparation of Contracts, CBP's, justification/ROI computation, supplier accreditation for major supply or service contracts, minimum of 3 comparative quotes, among others, shall apply to all purchases of M&S, equipment and services.

In the case of contracts or purchases conducted through bidding, the proponent shall prepare the Terms of Reference, inform and obtain consent from the CPBAC and invite prospective contractors/suppliers to submit their sealed bids on or before the appointed time and date. The proponent shall evaluate and tabulate the bids for presentation to the CPBAC which shall award the same.

After the award of contract by the CPBAC, the corresponding Agreement or Contract shall be prepared by the proponent for review and comments of the Legal and Finance groups. All contracts shall be approved by the Board of Directors. On the other hand, purchases of materials/services shall be covered by Purchase Order/s, and observe BC Policy on Signing Authority.

V. Others

AFC and BTI shall be given priority over all outside contractors or suppliers.

A bi-monthly report shall be made by the Purchasing group on the summary of contracts/purchases approved by the CPBAC. The report shall contain the nature of item purchased or contracted, name of supplier/contractor, value of contract and/or purchase, total purchases/contract for the period, and year-to-date. The said report shall be submitted to CPBAC, the President/CEO, CFO, and Treasury.

Contracts or Purchases which were not approved by the CPBAC will not be honored and processed for payment.

For your guidance and strict compliance.


B.F.G. ROMUALDEZ



BenguetCorp

Annex "Q"

May 29, 2017

SEC Reg. No. 11341

SECURITIES AND EXCHANGE COMMISSION
SEC Building, EDSA, Greenhills
Mandaluyong City



Attention: ATTY. JUSTINA F. CALLANGAN
Director, Corporate Governance and Finance Department

Gentlemen:

We submit hereto is now Manual on Corporate Governance of Benguet Corporation pursuant to Memorandum Circular No. 20 Series of 2016 of the Securities and Exchange Commission.

We trust that our new Manual is in order

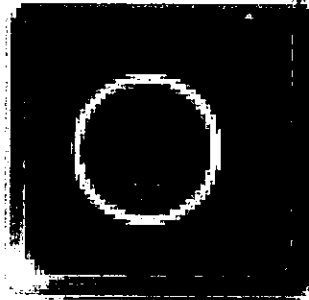
Very truly yours,

BENGUET CORPORATION

By:

REYNALDO P MENDOZA
Senior Vice President, Public Affairs, Legal
and Assistant Corporate Secretary

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.



Benguet Corporation BC

PSE Disclosure Form 17-18 - Other SEC Forms/Reports/Requirements

Form/Report Type	Manual on Corporate Governance
Report Period/Report Date	Jan 1, 2017

Description of the Disclosure
We furnish PSE the attached Manual on Corporate Governance of Benguet Corporation which took effect on January 1, 2017 per Memorandum Circular No. 19 Series of 2016 of the Securities and Exchange Commission (SEC).

Filed on behalf by:

Name	HERMOGENE REAL
Designation	Corporate Secretary

Shirley Cueva

From: Shirley Cueva
Sent: Tuesday, May 25, 2021 12:27 PM
To:
Subject: BENGUET CORPORATION PRESS RELEASE
Attachments: FINAL_Press Release 2021.docx

Dear media friends,

Please see attached statement of BENGUET CORPORATION on posted consolidated income in 2020. Would appreciate publication of attached in your papers.

Thank you very much and more power.

SHIRLEY S. CUEVA
Exec. Asst.



BenguetCorp
7F Universal Re Building
106 Paseo de Roxas
Makati City
Tel. 88104368

BENGUET CORPORATION RECORDS HIGHER CONSOLIDATED NET INCOME IN 2020:

Publicly-listed BENGUET CORPORATION (the “Company”), as the oldest mining company in the country, has posted consolidated net income of P381.4 Million in 2020, more than triple the net income of P115.7 Million in 2019. Combined revenues sourced mainly from nickel, gold and lime sales registered at P1.6 Billion, 100% higher than 2019 revenues of P802 Million. Following resumption last October 2020 of mining operation of its nickel project in Zambales, its wholly owned subsidiary, BenguetCorp Nickel Mines., Inc. (“BNMI”), was able to take full advantage of the upbeat market for low / mid grades at higher prices. The gold output of its Acupan mine on the other hand benefited from higher average gold price. The strong performance of the Company despite effects of the pandemic is also attributable to lower operating cost and efficient mine production under stringent ISO standards.

Shirley Cueva

From: Shirley Cueva
Sent: Tuesday, June 1, 2021 3:54 PM
To: [Redacted]
Subject: Press Release on 2021 FIRST QTR RESULTS
Attachments: Press release on 2021 FIRST QTR RESULTS.docx

Dear media friends,

Please see attached statement of BENGUET CORPORATION on 2021 FIRST QUARTER results. Would appreciate publication of attached in your papers.

Thank you very much and more power.

For further queries/info, you may call our EVP, Atty Rey Mendoza at 8812 1220 or 77519137.

SHIRLEY S. CUEVA
Exec. Asst.



BenguetCorp
7F Universal Re Building
106 Paseo de Roxas
Makati City
Tel. 88104368

BENGUET CORPORATION Registered Higher First Quarter 2021 Results

Riding high on the momentum of its exceptional operating performance in 2020 following the DENR lifting of the suspension of its nickel operation in Zambales, PSE-listed Benguet Corporation (BC) disclosed it registered consolidated net income of ₱518.6 Million in the first quarter of 2021, or over nine times the ₱56.7 Million net income for the same period last year. The 915% increase in after tax income was the result of combined earnings from its gold, nickel and lime projects which accounted for total consolidated revenue of ₱1.3 Billion in the first quarter of this year or over 3 times of last year's revenue of ₱408 Million. While cost and operating expenses unavoidably went up by 68% year on year to ₱571.1 Million due to higher corresponding production, selling expenses, and payment of excise taxes and royalty fees to the government, prudent cost management, substantial nickel export as well as improved gold production volumes gave rise to the big positive variance. Amidst the pandemic, the Company is steadily pursuing a growth strategy as it continues to implement precautionary measures to protect the health and safety of its employees, contractors and the host communities.

Shirley Cueva

From: Shirley Cueva
Sent: Wednesday, June 16, 2021 11:24 AM
To:
Cc: hermogene real
Subject: BENGUET CORP PRESS RELEASE
Attachments: Press Release - new BNMI director.pdf

Dear media friends,

Please see below's link on PRESS RELEASE of BENGUET CORPORATION regarding the appointment of new director of its wholly-owned subsidiary, Benguetcorp Nickel Mines, Inc. Would appreciate publication of attached in your papers.

https://drive.google.com/file/d/1acpttcM6TE6ngacrUPsu7T_BnrZuZDQD/view?usp=sharing

Thank you very much and more power.

For further queries/info, you may call our EVP, Atty Rey Mendoza at 8812 1220 or 77519137.

Thank you and best regards,

SHIRLEY S. CUEVA
Exec. Asst.



BenguetCorp
7F Universal Re Building
106 Paseo de Roxas
Makati City
Tel. 88104368

Banaag named youngest mining director

BenguetCorp Nickel Mines, Inc (BNMI) appointed its youngest director Clark Banaag effective June 11, 2021.

Banaag joined BNMI in 2020 serving as the Chief Risk Officer. He is also responsible for the company's environmental compliance and has oversight in corporate social responsibility.

Prior to his appointment as director, Banaag worked in BNMI's parent company, Benguet Corporation (BC), the oldest mining company in the Philippines and in Marcventures Mining and Development Corporation (MMDC). He also served as the SK Chairperson of Sampaga, Batangas City where he spearheaded public service events like civil service review, UPCAT review, free legal assistance, environment protection seminar and youth leadership programs among others.

BC reported a net income of Php 518.6M in the first quarter of 2021, nine times greater than Php 56.7 million income for the same period last year. Its wholly-owned subsidiary, BNMI contributed 83% or Php 432.7 million. The Sta. Cruz Nickel Project of BNMI saw revenue rise to Php 1.05 billion due to substantial nickel export and better nickel prices.

Optimistic about the future, Banaag said that the Board and management will work together to ensure BNMI's profitability and sustainable success. "It's an honor to become part of the BNMI's board. During my term as director, both business profitability and adequate environmental protection will be my top priorities." Banaag further stated that he will use his law and agricultural economics background from University of the Philippines to help guide management achieve its goals.



Clark Banaag graduation photo in the University of the Philippines College of Law



Banaag concurrently serves as a director and vice president for operations in Arrow Freight Corporation, a warehouse and freight company based in Valenzuela City.

BC Vice President Val Bongalos (left), BNMI Chief Risk Officer Clark Banaag (center) and BC President Lina Fernandez (right) in Balatoc Mine Site, Itogon, Benguet Prov.

From: Shirley Cueva <scueva@benguetcorp.com>

Sent: Friday, August 20, 2021, 1:30 PM

To: [\[redacted\]](#)

Cc: Chamber of Mines of the Philippines

Subject: BENGUET CORP PRESS RELEASE

Dear media friends,

Please see below's PRESS RELEASE of BENGUET CORPORATION regarding its 2021 FIRST HALF results.

BENGUETCORP PRESS RELEASE

The continued surge in gold and nickel prices augured well for Benguet Corporation in the first half of 2021. Nickel and gold prices increased by 77% and 10% year on year. The listed miner disclosed that its mid-year revenue climbed to ₱2.3 Billion, more than triple compared to the revenue a year ago of ₱702 Million. After tax income is ₱822 Million, eight times the ₱99 Million income in the same period last year. Bullish demand and good weather prevailed, which allowed its wholly-owned nickel subsidiary to triple its export volume to 799 thousand tons of ore equivalent to 15 boatloads, compared to 265 thousand tons or 5 boatloads last year. On the other hand, gold production likewise considerably increased by 44% as operations return to near-normal following the implementation of health and safety protocols during this pandemic.

Would appreciate its publication in your respective newspapers.

Thank you very much and more power.

For further queries/info, you may call our EVP, Atty Rey Mendoza at 8812 1220 or 77519137.

Thank you and best regards,

SHIRLEY S. CUEVA

Exec. Asst.



BenguetCorp

7F Universal Re Building

106 Paseo de Roxas

Makati City

Tel. 88104368

**INTERNAL AUDIT AND RISK OFFICE
2021 WORK SUMMARY**

TYPE	ACTIVITY
Compliance	1. Assisted in the preparation of 2020 Sustainability Report.
	2. Summarized the result of the following Directors' Self-assessment Worksheet as required in i-ACGR: <ul style="list-style-type: none"> - Board of Directors - Audit Committee - Board Risk Oversight Committee (BROC) - Executive Committee - Nomination and Election - Salary and Stock Option (Compensation)
Corporate Governance	3. Prepared the March 2021 BROC Minutes of Meeting.
	4. Prepared the April 2021 BROC Minutes of Meeting.
Internal Audit Activities	5. Reviewed and observed the implementation of COVID-19 protocols in Balatoc Gold Operations (BGO).
	6. Reviewed the Acupan Contract Mining Project (ACMP) Contracts.
	7. Reviewed the Mill Refinery security protocols.
	8. Reviewed the Social Development and Management Program (SDMP) liquidation of expenses.
	9. Performed an audit of operations of BenguetCorp Laboratories, Inc. (BCLI).
	10. Reviewed the hauling contracts of Benguetcorp Nickel Mines, Inc. (BNMI)
	11. Reviewed and reconciled the BGO contractors' share in the BSP gold sales.
	12. Reviewed the maintenance fee, power dues, and collection processes of Irisan Lime Project (ILP) and BGO.
	13. Financial Statement analysis of BCLI revenue and cost.
	14. Reviewed BCLI's billing, accounts receivable and collection processes.

TYPE	ACTIVITY
	15. Follow up of action plans from previous years' audit: <ul style="list-style-type: none"> - BGO cash collection - BCLI operations audit
	16. Regular review of check vouchers prior to endorsement to check signatories and liquidation of cash advance of BCLI, ILP and BMC Forestry.
ISO Management	17. Assisted in the preparation of ISO documentation of BNMI and BCLI.
	18. Assisted in the ISO Surveillance audit of BGO, BNMI and BCLI.
Policy Documentation	19. Prepared and issued a memo for the review of check vouchers and liquidation of cash advances of BCLI, ILP and BMC Forestry.
Others	20. Assisted in BC and BNMI new Accounting System migration (on going).



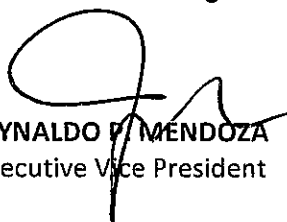
ATTESTATION


That we, **LINA G. FERNANDEZ, REYNALDO P. MENDOZA** and **GLENN JOHN V. RARAS**, with business address at 7/F, Universal-Re Building, 106 Paseo de Roxas, Makati City, Metro Manila, hereby state:

- (1) We are the President, Executive Vice President and Chief Audit/Internal Audit Head, respectively, for the calendar year 2021 of **BENGUET CORPORATION**, a corporation registered under Philippine laws, with principal office at 7/F, Universal-Re Building, 106 Paseo de Roxas, Makati City 1226;
- (2) Benguet Corporation is a mining company registered in the Securities and Exchange Commission (SEC) and its shares are listed in the Philippine Stock Exchange (PSE);
- (3) To our knowledge, a sound internal audit, control and compliance system is in place in the Company and working effectively for the covered reporting period January to December 2021.
- (4) This attestation is made in compliance with the Integrated Annual Corporate Governance Report of the PSE and SEC.

IN WITNESS WHEREOF, we have hereunto signed this Attestation on this MAY 18 2022 day of May, 2022 in Makati City.


LINA G. FERNANDEZ
President


REYNALDO P. MENDOZA
Executive Vice President



GLENN JOHN V. RARAS
Internal Audit Head

REPUBLIC OF THE PHILIPPINES)
MAKATI CITY) S.S.

SUBSCRIBED AND SWORN to before me this MAY 18 2022 at Makati City, Metro Manila, affiants exhibited to me their competent proof of identification as follows:

REYNALDO P. MENDOZA	SSS No. 03-3865936-9	Office of the Philippine Social Security System (SSS)
LINA G. FERNANDEZ	SSS No. 03-7537025-8	Office of the Philippine Social Security System (SSS)
GLENN JOHN V. RARAS	SSS No. 34-1360196-7	Office of the Philippine Social Security System (SSS)

Doc. No. 64 ;
Page No. 19 ;
Book No. II ;
Series of 2022.

NOTARY PUBLIC

SHEILA C. CENIT-BELGIC
Commission No. M-055
Notary Public for Makati City
Until December 31, 2023
7F Universal Re Building
106 Paseo de Roxas, Makati City
Roll No. 53476
IBP Life Member No. 014470 / 02.18.16
PTR No. MKT 8869519 / 01.17.2022

SAFETY, HEALTH AND EMPLOYEE ENGAGEMENT

I. SAFETY AND HEALTH PROGRAMS

A. Compliances

1. Regular monthly submission to DOLE of Workplace COVID-19 Prevention and Control Compliance Report.
2. Submission of the Annual Work Accident/Illness Exposure Data Report and Annual Medical Report.
3. Passed the annual ocular inspection and obtained Fire Safety Inspection Certificate.
4. The Company maintained the lactation station as part of the Lactation Breaks Policy for female employees.
5. Conducted Annual Physical Exam for all employees.

B. Regular Safety and Health Activities

1. Participated in the conduct of Fire and Earthquake Drills as facilitated by the Building Admin in partnership with the Bureau of Fire Protection.
2. Regular conduct of Safety Committee meetings.
3. Provided trainings and maintain certifications for the designated Safety officers.
4. Dissemination of information about COVID updates and other wellness snippets.

C. Covid 19 Response

1. Since the start of the pandemic, the Company provided Shuttle Service to employees
2. The Company adapted Flexible Work Arrangement during surge of the pandemic.
3. Regular comprehensive disinfection in the office.
4. Free Antigen and RT-PCR testing to employees specially during COVID surge.
5. Use of Health Declaration forms to monitor daily health conditions of employees during the pandemic.
6. Devised COVID 19 Tracker for efficient contract tracing.
7. Closely coordinated with the city health units for the vaccination of booster shots. To date, 100% of the Makati based employees are vaccinated. The Company allows employees to take a paid leave of absence during employees' scheduled inoculation.
8. Total COVID 19 related expense amounted to P 8,732,718.00

II. Employee Engagement and Benefits

1. Annual Flu and anti-Pneumonia vaccination were administered.
2. Yearly update on insurance coverage.
3. HR planned company hosted activities that observe social distancing such as online mass, virtual games, zoom meetings were done in accordance with IATF health protocols on mass gatherings. The Company continued to support for the celebration of the yearly founding anniversary and yuletide season activities and other celebrations.
4. *Vacation Leave with Pay*. Help our employees prevent burnout and promote work-life balance by allowing more time to be spent with family and significant others and close friends.
5. The Company crafted policy on Mental Health to address health issues brought about by the pandemic
6. The Company provides medical benefits to assist employees during sickness.


RHODORA S. SONGAYAB
Corporate HR Head

	PARTICIPANTS	TRAINING / SEMINAR / WEBINAR	INCLUSIVE DATE	# OF HOURS	FACILITATOR / TRAINING PROVIDER	
1	EDEN BARCELONA	Embracing Good Corporate Governance	11/12/2021	4	Center for Training and Development Inc	
2	EDEN BARCELONA	Inclusion of Gender Indicators in Sustainability Disclosure Training	11/20 to 25, 2021	16	PSE	
3	SHEILA C. BELGICA	The Road to IPO: SME Listing	9/16-17/2021	7	Philippine Stock Exchange	
4	SHEILA C. BELGICA	Building Back Better Business: Financial Management in Investment, In	9/24/2021	8	DTI	
5	SHEILA C. BELGICA	"Corporation Vested with Public Interest" under the Revised Corp Code	8/16/2021	1	Access Inc.	
6	SHEILA C. BELGICA	Understanding Laws, Rules and Regulations Related to Gender and Dev	8/17,18,20/2021	18	DENR	
7	SHEILA C. BELGICA	2021 SEC-GRI Workshop Series 1. Updates & Gu			SEC-GRI	
8	SHEILA C. BELGICA	Beneficial Ownership transparency in the Philippines	9/30/2021	2	SEC-GRI	
9	SHEILA C. BELGICA	Corporate Governance Standards and Practices: Addressing Issues and	7/16/2021	2	SEC	
10	SHEILA C. BELGICA	Embracing Good Corporate Governance for Effective and Efficient Man	11/12/2021	4	Center for Training and Development Inc	
11	DAISY A. MEJIA	URCC_Fire Drill Webinar: Fire Safety	7/6/2021	2	URCC / BFP	
12	DAISY A. MEJIA	PAG IBIG Webinar: Employer Virtual Account	9/29/2021	1	PAG IBIG Buendia I	
13	NEILSEN D. OLFINDO	URCC_Fire Drill Webinar: Fire Safety	7/6/2021	2	URCC / BFP	
14	NEILSEN D. OLFINDO	Teach / PAMP CSR Program	2021 4/13-1	32	People Management Association of the Philippines Inc	
15	MARKLESTER D. GALLO	URCC_Fire Drill Webinar: Fire Safety	7/6/2021	2	URCC / BFP	
16	MARKLESTER D. GALLO	PAG IBIG Webinar: Employer Virtual Account	9/29/2021	1	PAG IBIG Buendia I	
17	MANUEL JOSEPH U. FRANCO	Embracing Good Corporate Governance	11/12/2021	4	Center for Training and Development Inc	
18	MANUEL JOSEPH U. FRANCO	Corporate Governance Standards and Practices: Addressing Issues and	7/16/2021	2	SEC	
19	LINA G. FERNANDEZ	Embracing Good Corporate Governance for Effective and Efficient Man	11/12/2021	4	Center for Training and Development Inc	
20	REYNALDO P. MENDOZA	Embracing Good Corporate Governance for Effective and Efficient Man	11/12/2021	4	Center for Training and Development Inc	
21	MAX D. ARCENO	Embracing Good Corporate Governance for Effective and Efficient Man	11/12/2021	4	Center for Training and Development Inc	
22	PAMELA M. GENDRANO	Embracing Good Corporate Governance for Effective and Efficient Man	11/12/2021	4	Center for Training and Development Inc	
23	SHEENA IRISH G. BARRA	Embracing Good Corporate Governance for Effective and Efficient Man	11/12/2021	4	Center for Training and Development Inc	
24	BENJAMIN L. SUCGANG	Embracing Good Corporate Governance for Effective and Efficient Man	11/12/2021	4	Center for Training and Development Inc	
25	SHIRLEY S. CUEVA	Embracing Good Corporate Governance for Effective and Efficient Man	11/12/2021	4	Center for Training and Development Inc	
26	RHODORA S. SONGAYAB	Embracing Good Corporate Governance for Effective and Efficient Man	11/12/2021	4	Center for Training and Development Inc	
27	GLENN JOHN V. RARAS	Embracing Good Corporate Governance for Effective and Efficient Man	11/12/2021	4	Center for Training and Development Inc	
28	GLYNESS C. AROZA	Orientation Program	9.2.21	2	In- House	
29	ERIC P. EVANGELISTA	Orientation Program	12.14.21	2	In- House	
30	ALVIN C. LIBONGCO	Orientation Program	6.15.21	2	In- House	
31	DENNIS P. REPASA	Orientation Program	9.2.21	2	In- House	
32	JOEL MACATO	Orientation Program	9.2.21	2	In- House	
33	Agayan, Adrian	Pre-Employment Orientation	January 6, 2021	4	Julio M. Minimo (HRA)	BRMC
34	Almazan, Ramil	Pre-Employment Orientation	January 6, 2021	4	Julio M. Minimo (HRA)	BRMC
35	Arbizo, Miguel	Pre-Employment Orientation	January 6, 2021	4	Julio M. Minimo (HRA)	BRMC
36	Arbizo, Ryan	Pre-Employment Orientation	January 6, 2021	4	Julio M. Minimo (HRA)	BRMC
37	Bunao, Gerald	Pre-Employment Orientation	January 6, 2021	4	Julio M. Minimo (HRA)	BRMC
38	Cruz, Brandolf	Pre-Employment Orientation	January 6, 2021	4	Julio M. Minimo (HRA)	BRMC
39	Echaluse, Nolben	Pre-Employment Orientation	January 6, 2021	4	Julio M. Minimo (HRA)	BRMC
40	Ednalan, Ernie	Pre-Employment Orientation	January 6, 2021	4	Julio M. Minimo (HRA)	BRMC
41	Esteila, Ruby	Pre-Employment Orientation	January 6, 2021	4	Julio M. Minimo (HRA)	BRMC
42	Gorospe, Jolas	Pre-Employment Orientation	January 6, 2021	4	Julio M. Minimo (HRA)	BRMC
43	Imperial, Glenn	Pre-Employment Orientation	January 6, 2021	4	Julio M. Minimo (HRA)	BRMC
44	Imperial, Jerome	Pre-Employment Orientation	January 6, 2021	4	Julio M. Minimo (HRA)	BRMC
45	Imperial, Jesson	Pre-Employment Orientation	January 6, 2021	4	Julio M. Minimo (HRA)	BRMC
46	Lacampunga, Albert	Pre-Employment Orientation	January 6, 2021	4	Julio M. Minimo (HRA)	BRMC
47	Ladino, Fernando	Pre-Employment Orientation	January 6, 2021	4	Julio M. Minimo (HRA)	BRMC
48	Macaraeg, Michael	Pre-Employment Orientation	January 6, 2021	4	Julio M. Minimo (HRA)	BRMC
49	Madamba, Aldrin	Pre-Employment Orientation	January 6, 2021	4	Julio M. Minimo (HRA)	BRMC
50	Madreo, Ronnel	Pre-Employment Orientation	January 6, 2021	4	Julio M. Minimo (HRA)	BRMC
51	Maniago, Ricardo	Pre-Employment Orientation	January 6, 2021	4	Julio M. Minimo (HRA)	BRMC

52	Manuel, Christian	Pre-Employment Orientation	January 6, 2021	4	Julio M. Minimo (HRA)	BRMC
53	Mendegorin, Julius	Pre-Employment Orientation	January 6, 2021	4	Julio M. Minimo (HRA)	BRMC
54	Mendigorin, Rolan	Pre-Employment Orientation	January 6, 2021	4	Julio M. Minimo (HRA)	BRMC
55	Merca, John Joshua	Pre-Employment Orientation	January 6, 2021	4	Julio M. Minimo (HRA)	BRMC
56	Merto, Mark Anthony	Pre-Employment Orientation	January 6, 2021	4	Julio M. Minimo (HRA)	BRMC
57	Merto, Onofre Marlon	Pre-Employment Orientation	January 6, 2021	4	Julio M. Minimo (HRA)	BRMC
58	Merto, Peter John	Pre-Employment Orientation	January 6, 2021	4	Julio M. Minimo (HRA)	BRMC
59	Modelo, Joshua	Pre-Employment Orientation	January 6, 2021	4	Julio M. Minimo (HRA)	BRMC
60	Mose, Jason	Pre-Employment Orientation	January 6, 2021	4	Julio M. Minimo (HRA)	BRMC
61	Nilo, Jeric	Pre-Employment Orientation	January 6, 2021	4	Julio M. Minimo (HRA)	BRMC
62	Nilo, Jerson	Pre-Employment Orientation	January 6, 2021	4	Julio M. Minimo (HRA)	BRMC
63	Oliganga, Marlon	Pre-Employment Orientation	January 6, 2021	4	Julio M. Minimo (HRA)	BRMC
64	Quintin, Roderick	Pre-Employment Orientation	January 6, 2021	4	Julio M. Minimo (HRA)	BRMC
65	Sarmiento, John Paul	Pre-Employment Orientation	January 6, 2021	4	Julio M. Minimo (HRA)	BRMC
66	Sarmiento, Marc Adrian	Pre-Employment Orientation	January 6, 2021	4	Julio M. Minimo (HRA)	BRMC
67	Sarmineto, Wilson	Pre-Employment Orientation	January 6, 2021	4	Julio M. Minimo (HRA)	BRMC
68	Tamayo, Marino	Pre-Employment Orientation	January 6, 2021	4	Julio M. Minimo (HRA)	BRMC
69	Villaruz, Rolando	Pre-Employment Orientation	January 6, 2021	4	Julio M. Minimo (HRA)	BRMC
70	Abrajano, Alvin	Pre-Employment Orientation	January 9, 2021	4	Julio M. Minimo (HRA)	BRMC
71	Atrero, Engelo Prail	Pre-Employment Orientation	January 9, 2021	4	Julio M. Minimo (HRA)	BRMC
72	Calimlim, Juliet	Pre-Employment Orientation	January 9, 2021	4	Julio M. Minimo (HRA)	BRMC
73	Erlanda, Jesus	Pre-Employment Orientation	January 9, 2021	4	Julio M. Minimo (HRA)	BRMC
74	Fernandez, Marlyn	Pre-Employment Orientation	January 9, 2021	4	Julio M. Minimo (HRA)	BRMC
75	Menor, Rodil	Pre-Employment Orientation	January 9, 2021	4	Julio M. Minimo (HRA)	BRMC
76	Menorca, Oliver	Pre-Employment Orientation	January 9, 2021	4	Julio M. Minimo (HRA)	BRMC
77	Minimo, Sante	Pre-Employment Orientation	January 9, 2021	4	Julio M. Minimo (HRA)	BRMC
78	Adan, Gabriel	Pre-Employment Orientation	January 30, 2021	4	Julio M. Minimo (HRA)	BRMC
79	Alvarez, Gerald	Pre-Employment Orientation	January 30, 2021	4	Julio M. Minimo (HRA)	BRMC
80	Amores, Hycienth Hannah	Pre-Employment Orientation	January 30, 2021	4	Julio M. Minimo (HRA)	BRMC
81	Dalisay, Arman	Pre-Employment Orientation	January 30, 2021	4	Julio M. Minimo (HRA)	BRMC
82	Delos Santos Jr, Julius	Pre-Employment Orientation	January 30, 2021	4	Julio M. Minimo (HRA)	BRMC
83	Destajo, Liwanag	Pre-Employment Orientation	January 30, 2021	4	Julio M. Minimo (HRA)	BRMC
84	Echon, Darwin	Pre-Employment Orientation	January 30, 2021	4	Julio M. Minimo (HRA)	BRMC
85	Echon, Leonora	Pre-Employment Orientation	January 30, 2021	4	Julio M. Minimo (HRA)	BRMC
86	Edrosalam, Ana Garce	Pre-Employment Orientation	January 30, 2021	4	Julio M. Minimo (HRA)	BRMC
87	Egnisaban, Carla	Pre-Employment Orientation	January 30, 2021	4	Julio M. Minimo (HRA)	BRMC
88	Maravillas, Lourdes	Pre-Employment Orientation	January 30, 2021	4	Julio M. Minimo (HRA)	BRMC
89	Menor, Consolacion	Pre-Employment Orientation	January 30, 2021	4	Julio M. Minimo (HRA)	BRMC
90	Mirador, Ginalyn	Pre-Employment Orientation	January 30, 2021	4	Julio M. Minimo (HRA)	BRMC
91	Mon, Manuel	Pre-Employment Orientation	January 30, 2021	4	Julio M. Minimo (HRA)	BRMC
92	Moselina, Leah M.	Pre-Employment Orientation	January 30, 2021	4	Julio M. Minimo (HRA)	BRMC
93	Murcia, Michael James	Pre-Employment Orientation	January 30, 2021	4	Julio M. Minimo (HRA)	BRMC
94	Notario, Jocelyn C.	Pre-Employment Orientation	January 30, 2021	4	Julio M. Minimo (HRA)	BRMC
95	Tungul, Janice	Pre-Employment Orientation	January 30, 2021	4	Julio M. Minimo (HRA)	BRMC
96	Uy, Janine Alyza Marie	Pre-Employment Orientation	January 30, 2021	4	Julio M. Minimo (HRA)	BRMC
97	Valera, Myra	Pre-Employment Orientation	January 30, 2021	4	Julio M. Minimo (HRA)	BRMC
98	Agaton, Czarina Mae A.	ISO Training Seminar	March 4-5, 2021	8	Ronnie R. Fernandez	BRMC
99	Asuncion, Shella Marice T.	ISO Training Seminar	March 4-5, 2021	8	Ronnie R. Fernandez	BRMC
100	Botor, Ralph Joseph E.	ISO Training Seminar	March 4-5, 2021	8	Ronnie R. Fernandez	BRMC
101	Bucat, Ernesto M.	ISO Training Seminar	March 4-5, 2021	8	Ronnie R. Fernandez	BRMC
102	Capill, Angelo V.	ISO Training Seminar	March 4-5, 2021	8	Ronnie R. Fernandez	BRMC
103	Casuyon, Mariglo M.	ISO Training Seminar	March 4-5, 2021	8	Ronnie R. Fernandez	BRMC

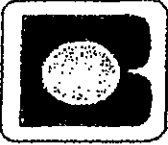
104	Danago, Dianah E.	ISO Training Seminar	March 4-5, 2021	8	Ronnie R. Fernandez	BRMC
105	Ecobisag, Reynaldo N.	ISO Training Seminar	March 4-5, 2021	8	Ronnie R. Fernandez	BRMC
106	Hallino, Marites L.	ISO Training Seminar	March 4-5, 2021	8	Ronnie R. Fernandez	BRMC
107	Hernando II, Leonard M.	ISO Training Seminar	March 4-5, 2021	8	Ronnie R. Fernandez	BRMC
108	Lumawig, Melissa Fritz S.	ISO Training Seminar	March 4-5, 2021	8	Ronnie R. Fernandez	BRMC
109	Minimo, Julio M.	ISO Training Seminar	March 4-5, 2021	8	Ronnie R. Fernandez	BRMC
110	Miranda, Mitchel Aura M.	ISO Training Seminar	March 4-5, 2021	8	Ronnie R. Fernandez	BRMC
111	Moralde, Juvenal M.	ISO Training Seminar	March 4-5, 2021	8	Ronnie R. Fernandez	BRMC
112	Mose, Juvenar M.	ISO Training Seminar	March 4-5, 2021	8	Ronnie R. Fernandez	BRMC
113	Orlanda, Katrina M.	ISO Training Seminar	March 4-5, 2021	8	Ronnie R. Fernandez	BRMC
114	Ripotola, Jessica M.	ISO Training Seminar	March 4-5, 2021	8	Ronnie R. Fernandez	BRMC
115	Sison, Ana Marie M.	ISO Training Seminar	March 4-5, 2021	8	Ronnie R. Fernandez	BRMC
116	Villania, Helen M.	ISO Training Seminar	March 4-5, 2021	8	Ronnie R. Fernandez	BRMC
117	Edora, John Anthony R.	ISO Training Seminar	March 4-5, 2021	8	Ronnie R. Fernandez	BRMC
118	Capili, Angelo V.	Advance Training Course on Climate Change, Greenhouse Gas Emission	April 6-8, 2021	8	Online Webinar - Alab Solutions., ASI	BRMC
119	Edquiban, Mark Edsel S.	Basic Occupational Safety & Health	April 26-30, 2021	40	Online Training - Safety House, Inc	BRMC
120	Abella, Archimedes	Emergency Response Team Training	May 28-30, 2021	8	Emergency Response Team	BRMC
121	Agaton, Czarina Mae A.	Emergency Response Team Training	May 28-30, 2021	8	Emergency Response Team	BRMC
122	Andal, Mark Joseph	Emergency Response Team Training	May 28-30, 2021	8	Emergency Response Team	BRMC
123	Balana, Christian Jay	Emergency Response Team Training	May 28-30, 2021	8	Emergency Response Team	BRMC
124	Bonilla, Jeffrey	Emergency Response Team Training	May 28-30, 2021	8	Emergency Response Team	BRMC
125	Bucat, Ernesto M.	Emergency Response Team Training	May 28-30, 2021	8	Emergency Response Team	BRMC
126	Caparas, Mc Nicole	Emergency Response Team Training	May 28-30, 2021	8	Emergency Response Team	BRMC
127	Carolino, Ricky	Emergency Response Team Training	May 28-30, 2021	8	Emergency Response Team	BRMC
128	Corpuz, Ronaldo S.	Emergency Response Team Training	May 28-30, 2021	8	Emergency Response Team	BRMC
129	Diola, Mel	Emergency Response Team Training	May 28-30, 2021	8	Emergency Response Team	BRMC
130	Ecaldre, Alex M.	Emergency Response Team Training	May 28-30, 2021	8	Emergency Response Team	BRMC
131	Edquiban, Mark Edsel S.	Emergency Response Team Training	May 28-30, 2021	8	Emergency Response Team	BRMC
132	Elamparo, Richard	Emergency Response Team Training	May 28-30, 2021	8	Emergency Response Team	BRMC
133	Elefane, Lim E.	Emergency Response Team Training	May 28-30, 2021	8	Emergency Response Team	BRMC
134	Esmar, Christopher	Emergency Response Team Training	May 28-30, 2021	8	Emergency Response Team	BRMC
135	Hallino, Marites L.	Emergency Response Team Training	May 28-30, 2021	8	Emergency Response Team	BRMC
136	Mary, Dan R.	Emergency Response Team Training	May 28-30, 2021	8	Emergency Response Team	BRMC
137	Mendoza Jr, Dominador C.	Emergency Response Team Training	May 28-30, 2021	8	Emergency Response Team	BRMC
138	Mendoza, Jonathan	Emergency Response Team Training	May 28-30, 2021	8	Emergency Response Team	BRMC
139	Mística, Enrico M.	Emergency Response Team Training	May 28-30, 2021	8	Emergency Response Team	BRMC
140	Molino, Lodegario	Emergency Response Team Training	May 28-30, 2021	8	Emergency Response Team	BRMC
141	Montevirgen, Marphy Q.	Emergency Response Team Training	May 28-30, 2021	8	Emergency Response Team	BRMC
142	Morados, Edwin	Emergency Response Team Training	May 28-30, 2021	8	Emergency Response Team	BRMC
143	Morana, Marvin	Emergency Response Team Training	May 28-30, 2021	8	Emergency Response Team	BRMC
144	Mores, Oliver	Emergency Response Team Training	May 28-30, 2021	8	Emergency Response Team	BRMC
145	Muyano, Francis	Emergency Response Team Training	May 28-30, 2021	8	Emergency Response Team	BRMC
146	Opolinto, Laurence M.	Emergency Response Team Training	May 28-30, 2021	8	Emergency Response Team	BRMC
147	Ravana, Reynaldo	Emergency Response Team Training	May 28-30, 2021	8	Emergency Response Team	BRMC
148	Aquino, Gary M.	ISO Awareness & Company Policy Re-Orientation	June 25, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
149	Botor, Ralph Joseph E.	ISO Awareness & Company Policy Re-Orientation	June 25, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
150	Bucat, Ernesto M.	ISO Awareness & Company Policy Re-Orientation	June 25, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
151	Cardano, Freddie P.	ISO Awareness & Company Policy Re-Orientation	June 25, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
152	Carolino, Ricky C.	ISO Awareness & Company Policy Re-Orientation	June 25, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
153	Coral, Julius B.	ISO Awareness & Company Policy Re-Orientation	June 25, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
154	Corpuz, Ronaldo S.	ISO Awareness & Company Policy Re-Orientation	June 25, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
155	Dela Cruz, Dante	ISO Awareness & Company Policy Re-Orientation	June 25, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC

156	Ecaruan, Jacklyn M.	ISO Awareness & Company Policy Re-Orientation	June 25, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
157	Echaluse, Nolben M.	ISO Awareness & Company Policy Re-Orientation	June 25, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
158	Esmar, Christopher M.	ISO Awareness & Company Policy Re-Orientation	June 25, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
159	Exala, Jemark M.	ISO Awareness & Company Policy Re-Orientation	June 25, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
160	Kollin, Danmark Loresto P.	ISO Awareness & Company Policy Re-Orientation	June 25, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
161	Mana, Catherine A.	ISO Awareness & Company Policy Re-Orientation	June 25, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
162	Mayor, Aderly M.	ISO Awareness & Company Policy Re-Orientation	June 25, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
163	Mendez, Edward P.	ISO Awareness & Company Policy Re-Orientation	June 25, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
164	Mendoza Jr, Dominador C.	ISO Awareness & Company Policy Re-Orientation	June 25, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
165	Miranda, Mary Leothe B.	ISO Awareness & Company Policy Re-Orientation	June 25, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
166	Mistica, Enrico M.	ISO Awareness & Company Policy Re-Orientation	June 25, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
167	Montevirgen, Marphy Q.	ISO Awareness & Company Policy Re-Orientation	June 25, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
168	Orlanda, Katrina M.	ISO Awareness & Company Policy Re-Orientation	June 25, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
169	Ripotola, Jessica M.	ISO Awareness & Company Policy Re-Orientation	June 25, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
170	Sison, Ana Marie M.	ISO Awareness & Company Policy Re-Orientation	June 25, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
171	Arbizo, Francisco M.	ISO Awareness & Company Policy Re-Orientation	June 26, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
172	De Guzman, Rey G.	ISO Awareness & Company Policy Re-Orientation	June 26, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
173	Edquiban, Mark Edsel S.	ISO Awareness & Company Policy Re-Orientation	June 26, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
174	Macam, Joana-Mie R.	ISO Awareness & Company Policy Re-Orientation	June 26, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
175	Marave, Mangie M.	ISO Awareness & Company Policy Re-Orientation	June 26, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
176	Marty, Samuel M.	ISO Awareness & Company Policy Re-Orientation	June 26, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
177	Mayo Jr, Rolando M.	ISO Awareness & Company Policy Re-Orientation	June 26, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
178	Mendoza, Domingo M.	ISO Awareness & Company Policy Re-Orientation	June 26, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
179	Misola, Emie M.	ISO Awareness & Company Policy Re-Orientation	June 26, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
180	Montalia, Rodel	ISO Awareness & Company Policy Re-Orientation	June 26, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
181	Mores, Oliver M.	ISO Awareness & Company Policy Re-Orientation	June 26, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
182	Movilla, Jennifer D.	ISO Awareness & Company Policy Re-Orientation	June 26, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
183	Muyano, Dimbert E.	ISO Awareness & Company Policy Re-Orientation	June 26, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
184	Muyano, Nelvin Y.	ISO Awareness & Company Policy Re-Orientation	June 26, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
185	Muyano, Wilfredo Y.	ISO Awareness & Company Policy Re-Orientation	June 26, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
186	Nacino, Rogene M.	ISO Awareness & Company Policy Re-Orientation	June 26, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
187	Obra, Richard B.	ISO Awareness & Company Policy Re-Orientation	June 26, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
188	Sison, Ana Marie M.	ISO Awareness & Company Policy Re-Orientation	June 26, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
189	Temporal, Reynald G.	ISO Awareness & Company Policy Re-Orientation	June 26, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
190	Awao, Antonio B.	ISO Awareness & Company Policy Re-Orientation	June 29, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
191	Diola, Mel T.	ISO Awareness & Company Policy Re-Orientation	June 29, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
192	Ecaldre, Alex M.	ISO Awareness & Company Policy Re-Orientation	June 29, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
193	Hernando II, Leonard M.	ISO Awareness & Company Policy Re-Orientation	June 29, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
194	Maca, Jimmy S.	ISO Awareness & Company Policy Re-Orientation	June 29, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
195	Mary, Dan R.	ISO Awareness & Company Policy Re-Orientation	June 29, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
196	Mon, Dominador M.	ISO Awareness & Company Policy Re-Orientation	June 29, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
197	Monsalud, Michael M.	ISO Awareness & Company Policy Re-Orientation	June 29, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
198	Mose, Juvenar M.	ISO Awareness & Company Policy Re-Orientation	June 29, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
199	Muyano, Francis E.	ISO Awareness & Company Policy Re-Orientation	June 29, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
200	Muyano, Gefree E.	ISO Awareness & Company Policy Re-Orientation	June 29, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
201	Opolinto, Laurence M.	ISO Awareness & Company Policy Re-Orientation	June 29, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
202	Peralta, Jherald	ISO Awareness & Company Policy Re-Orientation	June 29, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
203	Ravana, Retnaldo M.	ISO Awareness & Company Policy Re-Orientation	June 29, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
204	Solanoy, Oliver M.	ISO Awareness & Company Policy Re-Orientation	June 29, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
205	Valdez, Dennis M.	ISO Awareness & Company Policy Re-Orientation	June 29, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
206	Diola, Mel T.	Introduction to Geostatistics	July 22, 2021	4	Webinar - Rogelio G. Laraya (PMRC)	BRMC
207	Reponce, Jennifer C.	Introduction to Geostatistics	July 22, 2021	4	Webinar - Rogelio G. Laraya (PMRC)	BRMC

208	Reyes, Edd Marc L.	Introduction to Geostatistics	July 22, 2021	4	Webinar - Rogelio G. Laraya (PMRC)	BRMC
209	Arizo Jr, Rogelio	ISO Awareness for Contractors	August 6, 2021	4	Angelo V. Capili (Envi)	BRMC
210	Colinares, Drexell John	ISO Awareness for Contractors	August 6, 2021	4	Angelo V. Capili (Envi)	BRMC
211	Deliquena, Dean C.	ISO Awareness for Contractors	August 6, 2021	4	Angelo V. Capili (Envi)	BRMC
212	Efe, Juvilyn M.	ISO Awareness for Contractors	August 6, 2021	4	Angelo V. Capili (Envi)	BRMC
213	Fennolar, Christian D.	ISO Awareness for Contractors	August 6, 2021	4	Angelo V. Capili (Envi)	BRMC
214	Garcia Jr, Eduardo R.	ISO Awareness for Contractors	August 6, 2021	4	Angelo V. Capili (Envi)	BRMC
215	Jimenez, Raymart	ISO Awareness for Contractors	August 6, 2021	4	Angelo V. Capili (Envi)	BRMC
216	Lucero, Jemwell	ISO Awareness for Contractors	August 6, 2021	4	Angelo V. Capili (Envi)	BRMC
217	Manas, Jaime M.	ISO Awareness for Contractors	August 6, 2021	4	Angelo V. Capili (Envi)	BRMC
218	Marquez, Charlie M.	ISO Awareness for Contractors	August 6, 2021	4	Angelo V. Capili (Envi)	BRMC
219	Mesia, Charlene M.	ISO Awareness for Contractors	August 6, 2021	4	Angelo V. Capili (Envi)	BRMC
220	Asuncion, Sheila Marice T.	ISO Awareness & Company Policy Re-Orientation	August 6, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
221	Bactol, Jessa Mae Q.	ISO Awareness & Company Policy Re-Orientation	August 6, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
222	Danago, Dianah E.	ISO Awareness & Company Policy Re-Orientation	August 6, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
223	Ecobisag, Reynaldo N.	ISO Awareness & Company Policy Re-Orientation	August 6, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
224	Larios, Amelita C.	ISO Awareness & Company Policy Re-Orientation	August 6, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
225	Lumawig, Melissa Fitz S.	ISO Awareness & Company Policy Re-Orientation	August 6, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
226	Machanum, Joey M.	ISO Awareness & Company Policy Re-Orientation	August 6, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
227	Molino, Lodegario M.	ISO Awareness & Company Policy Re-Orientation	August 6, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
228	Moralde, Juvenal M.	ISO Awareness & Company Policy Re-Orientation	August 6, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
229	Reponte, Jennifer C.	ISO Awareness & Company Policy Re-Orientation	August 6, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
230	Reyes, Edd Marc L.	ISO Awareness & Company Policy Re-Orientation	August 6, 2021	4	Angelo V. Capili (Envi) and Julio M. Minimo (HRA)	BRMC
231	Asuncion, Sheila Marice T.	Basic Internal Audit Training	August 10-11, 2021	16	TUV-R (Allan Topacio, Joan Marco)	BRMC
232	Bactol, Jessa Mae Q.	Basic Internal Audit Training	August 10-11, 2021	16	TUV-R (Allan Topacio, Joan Marco)	BRMC
233	Botor, Ralph Joseph E.	Basic Internal Audit Training	August 10-11, 2021	16	TUV-R (Allan Topacio, Joan Marco)	BRMC
234	Capili, Angelo V.	Basic Internal Audit Training	August 10-11, 2021	16	TUV-R (Allan Topacio, Joan Marco)	BRMC
235	Casuyon, Mariglo M.	Basic Internal Audit Training	August 10-11, 2021	16	TUV-R (Allan Topacio, Joan Marco)	BRMC
236	Danago, Dianah E.	Basic Internal Audit Training	August 10-11, 2021	16	TUV-R (Allan Topacio, Joan Marco)	BRMC
237	Diola, Mei T.	Basic Internal Audit Training	August 10-11, 2021	16	TUV-R (Allan Topacio, Joan Marco)	BRMC
238	Exala, Jemark M.	Basic Internal Audit Training	August 10-11, 2021	16	TUV-R (Allan Topacio, Joan Marco)	BRMC
239	Hernando II, Leonard M.	Basic Internal Audit Training	August 10-11, 2021	16	TUV-R (Allan Topacio, Joan Marco)	BRMC
240	Kollin, Danmark Loresto P.	Basic Internal Audit Training	August 10-11, 2021	16	TUV-R (Allan Topacio, Joan Marco)	BRMC
241	Lumawig, Melissa Fritz S.	Basic Internal Audit Training	August 10-11, 2021	16	TUV-R (Allan Topacio, Joan Marco)	BRMC
242	Machanum, Joey M.	Basic Internal Audit Training	August 10-11, 2021	16	TUV-R (Allan Topacio, Joan Marco)	BRMC
243	Mary, Dan R.	Basic Internal Audit Training	August 10-11, 2021	16	TUV-R (Allan Topacio, Joan Marco)	BRMC
244	Molino, Lodegario M.	Basic Internal Audit Training	August 10-11, 2021	16	TUV-R (Allan Topacio, Joan Marco)	BRMC
245	Moralde, Juvenal M.	Basic Internal Audit Training	August 10-11, 2021	16	TUV-R (Allan Topacio, Joan Marco)	BRMC
246	Mose, Juvenal M.	Basic Internal Audit Training	August 10-11, 2021	16	TUV-R (Allan Topacio, Joan Marco)	BRMC
247	Orianda, Katrina M.	Basic Internal Audit Training	August 10-11, 2021	16	TUV-R (Allan Topacio, Joan Marco)	BRMC
248	Reponte, Jennifer C.	Basic Internal Audit Training	August 10-11, 2021	16	TUV-R (Allan Topacio, Joan Marco)	BRMC
249	Reyes, Edd Marc L.	Basic Internal Audit Training	August 10-11, 2021	16	TUV-R (Allan Topacio, Joan Marco)	BRMC
250	Sison, Ana Marie M.	Basic Internal Audit Training	August 10-11, 2021	16	TUV-R (Allan Topacio, Joan Marco)	BRMC
251	Villania, Helen M.	Basic Internal Audit Training	August 10-11, 2021	16	TUV-R (Allan Topacio, Joan Marco)	BRMC
252	Adoremos, Maricel E.	Chemical Safety (Understanding SDS & Spill Control Response	August 18-19, 2021	16	Esmeralda C. Gamali - Safety First Training & Consultancy	BRMC
253	Amores, Zeny A.	Chemical Safety (Understanding SDS & Spill Control Response	August 18-19, 2021	16	Esmeralda C. Gamali - Safety First Training & Consultancy	BRMC
254	Apsay, Marilyn F.	Chemical Safety (Understanding SDS & Spill Control Response	August 18-19, 2021	16	Esmeralda C. Gamali - Safety First Training & Consultancy	BRMC
255	Asuncion, Sheila Marice T.	Chemical Safety (Understanding SDS & Spill Control Response	August 18-19, 2021	16	Esmeralda C. Gamali - Safety First Training & Consultancy	BRMC
256	Bactol, Jessa Mae Q.	Chemical Safety (Understanding SDS & Spill Control Response	August 18-19, 2021	16	Esmeralda C. Gamali - Safety First Training & Consultancy	BRMC
257	Balana, Benjur O.	Chemical Safety (Understanding SDS & Spill Control Response	August 18-19, 2021	16	Esmeralda C. Gamali - Safety First Training & Consultancy	BRMC
258	Copeland, Reylan E.	Chemical Safety (Understanding SDS & Spill Control Response	August 18-19, 2021	16	Esmeralda C. Gamali - Safety First Training & Consultancy	BRMC
259	Danago, Dianah E.	Chemical Safety (Understanding SDS & Spill Control Response	August 18-19, 2021	16	Esmeralda C. Gamali - Safety First Training & Consultancy	BRMC

260	Edquiban, Mark Edsel S.	Chemical Safety (Understanding SDS & Spill Control Response	August 18-19, 2021	16	Esmeralda C. Gamali - Safety First Training & Consultancy	BRMC
261	Elefane, Lim E.	Chemical Safety (Understanding SDS & Spill Control Response	August 18-19, 2021	16	Esmeralda C. Gamali - Safety First Training & Consultancy	BRMC
262	Lumawig, Melissa Fritz S.	Chemical Safety (Understanding SDS & Spill Control Response	August 18-19, 2021	16	Esmeralda C. Gamali - Safety First Training & Consultancy	BRMC
263	Mante, Elmie P.	Chemical Safety (Understanding SDS & Spill Control Response	August 18-19, 2021	16	Esmeralda C. Gamali - Safety First Training & Consultancy	BRMC
264	Mary, Dan R.	Chemical Safety (Understanding SDS & Spill Control Response	August 18-19, 2021	16	Esmeralda C. Gamali - Safety First Training & Consultancy	BRMC
265	Misa, Cory G.	Chemical Safety (Understanding SDS & Spill Control Response	August 18-19, 2021	16	Esmeralda C. Gamali - Safety First Training & Consultancy	BRMC
266	Monsalud, Nerissa B.	Chemical Safety (Understanding SDS & Spill Control Response	August 18-19, 2021	16	Esmeralda C. Gamali - Safety First Training & Consultancy	BRMC
267	Chen-ay, Amboni	Technical Lecture Series: Best Practices in the Minerals Industry	May 29 to July 10, 202	16	Esmeralda C. Gamali - Safety First Training & Consultancy	BRMC
268	Jasper Jake C. Nakihid	Technical Lecture Series: Best Practices in the Minerals Industry	May 29 to July 10, 202	16	MGB CAR	BGO
269	Katleen B. Loreena	Sustainable Tourism and Carrying Capacity Workshop	July 19-20, 2021	16	MGB CAR	BGO
270	Gina P. Guindalos	ISO EMS 14001:2015 Internal Auditors Training	8/11/2021	8	TuVR	BGO
271	Warlee B. Garcia	ISO EMS 14001:2015 Internal Auditors Training	8/11/2021	8	TuVR	BGO
272	Ian Joseph N. Estonillo	ISO EMS 14001:2015 Internal Auditors Training	8/11/2021	8	TuVR	BGO
273	Oliver D. Lalpuot	ISO EMS 14001:2015 Internal Auditors Training	8/11/2021	8	TuVR	BGO
274	Michael B. Balao	ISO EMS 14001:2015 Internal Auditors Training	8/11/2021	8	TuVR	BGO
275	John Ferben S. Depnag	ISO EMS 14001:2015 Internal Auditors Training	8/11/2021	8	TuVR	BGO
276	Melanie F. Pamilagag	Pollution Control Training Course	Sept 6-10, 2021	16	DENR	BGO
277	Carolyn G. Cruz	82 PICHe National Convention for Chemical Engrs	Sept 15-17, 2021	16	PICHE	BGO
278	Adelaida A. Gayyed	82 PICHe National Convention for Chemical Engrs	Sept 15-17, 2021	16	PICHE	BGO
279	Ernesto S. Dedel Jr.	82 PICHe National Convention for Chemical Engrs	Sept 15-17, 2021	16	PICHE	BGO
280	Michael B. Balao	82 PICHe National Convention for Chemical Engrs	Sept 15-17, 2021	16	PICHE	BGO
281	Robert Manuel S. Villarama Jr	82 PICHe National Convention for Chemical Engrs	Sept 15-17, 2021	16	PICHE	BGO
282	Michelle D. Mulato	82 PICHe National Convention for Chemical Engrs	Sept 15-17, 2021	16	PICHE	BGO
283	Ariane Mae M. Dangilan	82 PICHe National Convention for Chemical Engrs	Sept 15-17, 2021	16	PICHE	BGO
284	Melanie F. Pamilagag	82 PICHe National Convention for Chemical Engrs	Sept 15-17, 2021	16	PICHE	BGO
285	Gina P. Guindalos	Ground Slope Stability in Mining	9/30/2021	8	PMRC	BGO
286	Dominador R. Sison Jr.	Ground Slope Stability in Mining	9/30/2021	8	PMRC	BGO
287	Paul Joshua F. Abiva	Ground Slope Stability in Mining	9/30/2021	8	PMRC	BGO
288	Chen-ay, Amboni	Ground Slope Stability in Mining	9/30/2021	8	PMRC	BGO
289	Kyla F. Bangaoet	Ground Slope Stability in Mining	9/30/2021	8	PMRC	BGO
290	Syrlil V. Cao	Ground Slope Stability in Mining	9/30/2021	8	PMRC	BGO
291	Katleen B. Loreena	Ground Slope Stability in Mining	9/30/2021	8	PMRC	BGO
292	Kyla F. Bangaoet	67TH ANMSEC SYMPOSIUM: Minerals Industry Symposium 2021	November 24-26, 202	24	PMSEA	BGO
293	Jasper Jake C. Nakihid	67TH ANMSEC SYMPOSIUM: Minerals Industry Symposium 2021	November 24-26, 202	24	PMSEA	BGO
294	Chen-ay, Amboni	67TH ANMSEC SYMPOSIUM: Minerals Industry Symposium 2021	November 24-26, 202	24	PMSEA	BGO
295	Dominador R. Sison Jr.	67TH ANMSEC SYMPOSIUM: Minerals Industry Symposium 2021	November 24-26, 202	24	PMSEA	BGO
296	Katleen B. Loreena	Responsible Mining: Resilience and Adaptability in the Mining Industry	12/15/2021	8	MGB CAR	BGO
297	Marissa P. Gomez	Responsible Mining: Resilience and Adaptability in the Mining Industry	12/15/2021	8	MGB CAR	BGO
298	Kenny M. Cabrerros	Responsible Mining: Resilience and Adaptability in the Mining Industry	12/15/2021	8	MGB CAR	BGO
299	Santiago C. Base	Responsible Mining: Resilience and Adaptability in the Mining Industry	12/15/2021	8	MGB CAR	BGO
300	Efren Banggyao	Responsible Mining: Resilience and Adaptability in the Mining Industry	12/15/2021	8	MGB CAR	BGO
301	Renante Mahilum	Responsible Mining: Resilience and Adaptability in the Mining Industry	12/15/2021	8	MGB CAR	BGO
302	Eugene Marc A. Fianza	Responsible Mining: Resilience and Adaptability in the Mining Industry	12/15/2021	8	MGB CAR	BGO
303	Paul Joshua F. Abiva	67TH ANMSEC SYMPOSIUM: Minerals Industry Symposium 2021	November 24-26, 202	24	PMSEA	BGO
304	Joshua Bendo	67TH ANMSEC SYMPOSIUM: Minerals Industry Symposium 2021	November 24-26, 202	24	PMSEA	BGO
305	GALAO-EY, IVY	Basic Life Support w/ First Aid Training	May 1-2, 2021	16	Philippine Red Cross	BCLI
306	ABOY, Ezyla	25th PAMET Virtual Convention	May 19-21, 2021	24	PAMET, INC	BCLI
307	ARELLANO, Allan D	Understanding the Reqmts of ISO 9001:2015	Nov 11, 2021	8	FDL Mgmt Consultancy	BCLI
308	ARELLANO, Allan D	QMS Documentation Awareness	Nov 15, 2021	8	FDL Mgmt Consultancy	BCLI
309	ARELLANO, Allan D	25th PAMET Virtual Convention	May 19-21, 2023	24	PAMET, INC	BCLI
310	ARIZ, Rachelle	Understanding the Reqmts of ISO 9001:2016	Nov 11, 2021	8	FDL Mgmt Consultancy	BCLI
311	ARIZ, Rachelle	QMS Documentation Awareness	Nov 15, 2021	8	FDL Mgmt Consultancy	BCLI

312	ARIZ, Rachele	INTERNAL AUDITOR's Training	Nov 18-19, 2021	16			
313	CABREROS, Melinda	Understanding the Reqmts of ISO 9001:2017	Nov 11, 2021	8		FDL Mgmt Consultancy	BCLI
314	CABREROS, Melinda	Corporate Governance	Nov 12, 2021	8		FDL Mgmt Consultancy	BCLI
315	CABREROS, Melinda	QMS Documentation Awareness	Nov 15, 2021	8		RS Bernaldo & Associates	BCLI
316	DUCUSIN, Flory	QMS Documentation Awareness	Nov 15, 2021	8		FDL Mgmt Consultancy	BCLI
317	DUCUSIN, Flory	INTERNAL AUDITOR's Training	Nov 18-19, 2021	16		FDL Mgmt Consultancy	BCLI
318	ENG-ENGA, Aida	Understanding the Reqmts of ISO 9001:2018	Nov 11, 2021	8		FDL Mgmt Consultancy	BCLI
319	ENG-ENGA, Aida	QMS Documentation Awareness	Nov 15, 2021	8		FDL Mgmt Consultancy	BCLI
320	ENG-ENGA, Aida	INTERNAL AUDITOR's Training	Nov 18-19, 2021	16		FDL Mgmt Consultancy	BCLI
321	ENG-ENGA, Aida	25th PAMET Virtual Convention	May 19-21, 2022	24		FDL Mgmt Consultancy	BCLI
322	FERNANDEZ, Teodumel	Understanding the Reqmts of ISO 9001:2019	Nov 11, 2021	8		PAMET, INC	BCLI
323	FERNANDEZ, Teodumel	QMS Documentation Awareness	Nov 15, 2021	8		FDL Mgmt Consultancy	BCLI
324	FERNANDEZ, Teodumel	INTERNAL AUDITOR's Training	Nov 18-19, 2021	16		FDL Mgmt Consultancy	BCLI
325	FERRER, Annabelle	Understanding the Reqmts of ISO 9001:2020	Nov 11, 2021	8		FDL Mgmt Consultancy	BCLI
326	FERRER, Annabelle	QMS Documentation Awareness	Nov 15, 2021	8		FDL Mgmt Consultancy	BCLI
327	FERRER, Annabelle	INTERNAL AUDITOR's Training	Nov 18-19, 2021	16		FDL Mgmt Consultancy	BCLI
328	FORTUNATO, Gylonia Irene	Understanding the Reqmts of ISO 9001:2021	Nov 11, 2021	8		FDL Mgmt Consultancy	BCLI
329	FORTUNATO, Gylonia Irene	QMS Documentation Awareness	Nov 15, 2021	8		FDL Mgmt Consultancy	BCLI
330	FORTUNATO, Gylonia Irene	INTERNAL AUDITOR's Training	Nov 18-19, 2021	16		FDL Mgmt Consultancy	BCLI
331	GUIEB, Maïla Pia	Understanding the Reqmts of ISO 9001:2022	Nov 11, 2021	8		FDL Mgmt Consultancy	BCLI
332	GUIEB, Maïla Pia	QMS Documentation Awareness	Nov 15, 2021	8		FDL Mgmt Consultancy	BCLI
333	GUIEB, Maïla Pia	INTERNAL AUDITOR's Training	Nov 18-19, 2021	16		FDL Mgmt Consultancy	BCLI
334	GUIEB, Maïla Pia	CAR Moving OSH to a Harmonious and Nurturing Workplace	Dec 10, 2021	8		FDL Mgmt Consultancy	BCLI
335	LACHICA, Kristine Bea	Understanding the Reqmts of ISO 9001:2023	Nov 11, 2021	8		DOLE OSH Center	BCLI
336	LACHICA, Kristine Bea	QMS Documentation Awareness	Nov 15, 2021	8		FDL Mgmt Consultancy	BCLI
337	NEBRE, Rachele Ann	Understanding the Reqmts of ISO 9001:2024	Nov 11, 2021	8		FDL Mgmt Consultancy	BCLI
338	NEBRE, Rachele Ann	QMS Documentation Awareness	Nov 15, 2021	8		FDL Mgmt Consultancy	BCLI
339	NEBRE, Rachele Ann	INTERNAL AUDITOR's Training	Nov 18-19, 2021	16		FDL Mgmt Consultancy	BCLI
340	OLIVAR, Mark Anthony	Understanding the Reqmts of ISO 9001:2025	Nov 11, 2021	8		FDL Mgmt Consultancy	BCLI
341	OLIVAR, Mark Anthony	QMS Documentation Awareness	Nov 15, 2021	8		FDL Mgmt Consultancy	BCLI
342	PADAOAN, Maricris	Understanding the Reqmts of ISO 9001:2026	Nov 11, 2021	8		FDL Mgmt Consultancy	BCLI
343	PADAOAN, Maricris	QMS Documentation Awareness	Nov 15, 2021	8		FDL Mgmt Consultancy	BCLI
344	PADAOAN, Maricris G.	The Data Privacy Act of 2012	Nov 26, 2021	8		FDL Mgmt Consultancy	BCLI
345	SACANLE, Catherine Rose	Understanding the Reqmts of ISO 9001:2027	Nov 11, 2021	8		PMAP	BCLI
346	SACANLE, Catherine Rose	QMS Documentation Awareness	Nov 15, 2021	8		FDL Mgmt Consultancy	BCLI
347	SACANLE, Catherine Rose	INTERNAL AUDITOR's Training	Nov 18-19, 2021	16		FDL Mgmt Consultancy	BCLI
348	SICDOY, Sheryl	Understanding the Reqmts of ISO 9001:2028	Nov 11, 2021	8		FDL Mgmt Consultancy	BCLI
349	SICDOY, Sheryl	QMS Documentation Awareness	Nov 15, 2021	8		FDL Mgmt Consultancy	BCLI
350	SORIANO, Bernadette	Basic Life Support w/ First Aid Training	May 1-2, 2022	17		Philippine Red Cross	BCLI
351	TAN, Leahbelle	Understanding the Reqmts of ISO 9001:2029	Nov 11, 2021	8		FDL Mgmt Consultancy	BCLI
352	TAN, Leahbelle	QMS Documentation Awareness	Nov 15, 2021	8		FDL Mgmt Consultancy	BCLI
353	TAN, Leahbelle	INTERNAL AUDITOR's Training	Nov 18-19, 2021	16		FDL Mgmt Consultancy	BCLI
354	TOLEDO, Grace	Understanding the Reqmts of ISO 9001:2030	Nov 11, 2021	8		FDL Mgmt Consultancy	BCLI
355	TOLEDO, Grace	QMS Documentation Awareness	Nov 15, 2021	8		FDL Mgmt Consultancy	BCLI
356	TOLEDO, Grace	INTERNAL AUDITOR's Training	Nov 18-19, 2021	16		FDL Mgmt Consultancy	BCLI
357	ZACARIAS, Freda	Understanding the Reqmts of ISO 9001:2031	Nov 11, 2021	8		FDL Mgmt Consultancy	BCLI
358	ZACARIAS, Freda	QMS Documentation Awareness	Nov 15, 2021	8		FDL Mgmt Consultancy	BCLI
359	ZACARIAS, Freda	INTERNAL AUDITOR's Training	Nov 18-19, 2021	16		FDL Mgmt Consultancy	BCLI

	BENGUET CORPORATION	Document No : _____
	SICK LEAVE/VACATION LEAVE POLICY	Date Prepared : May 2014
Distribution Copies: Internal Control Distribution Files/Original	Issued by:	Revision No : 02
	ROLAND P. DE JESUS/CHUCHI C. DEL PRADO Vice President, Corporate HRA	Effective Date : _____
		Approved by: <i>Renato A. Claravall</i> RENATO A. CLARAVALL President/OIC

I. PURPOSE

Benguet Corporation respects each employee's right to enjoy a work-life balance. Work-life balance includes proper prioritizing between career or ambition, pleasure, leisure, family and spiritual development. A good work life balance condition promotes retention, increases productivity, and reduces absenteeism.

In view of this belief, the company provides the following leaves with pay to all eligible employees to allow them to take some time off from work either for health reasons, emergency situations or even for relaxation purposes and enjoyment of a well balanced life.

This policy will also define the proper procedures and guidelines to be followed in the application availment, and accumulation of vacation leave and sick leave

II. COVERAGE

This policy shall be applicable to all Managers (Assistant Unit Managers and Up)
For non-managerial employees, a separate policy on SL/VL shall apply.

III. GUIDELINES

VACATION LEAVE (VL)

1. Eligibility

A Manager who has completed one year of service with the Company inclusive of probationary period shall be entitled to avail of the vacation leave with pay under this policy. Hence, vacation leave filed during the first year of employment shall be without pay.

2. Vacation Leave Credits

A Manager shall earn 1.25 days VL credits for each month or a total of 15 days a year.

3. Computation of Vacation Leave Credits

VL credits shall be computed as follows;

VL credits earned on the employee's 1 st year	15 days
Add: VL credits earned on the employee's 2 nd year	15 days
Less: VL used	xx days
Total VL credits available	xx days

4. Commutation of unused VL credits

4.1 Unused VL credits shall be commutable to cash when a Manager is separated from the Company for whatever reasons except when separated for just cause as defined by the Labor Code.

4.2 If, for justifiable reasons, the Manager is unable to take the full 15 days leave during the year, the unused balance may be carried over/rolled-out within 2 years; and the remaining balance must be utilized on or before the Manager's anniversary/hiring date.

4.3 If the remaining VL balance is not utilized during the prescribed period due to exigencies, the Manager may request for a commutation of VL which is subject to approval of the Head of Operating Unit (for minesites) or Division Head (for CHQ).

Illustration:

Employee "A" was hired in May 16, 2011

May 16, 2012 VL credits	=	15 days
May 16, 2013 VL credits	=	15 days
		=====
Total VL credits	=	30 days
Less: VL used	=	(15) days
		=====
VL Commutable to cash	=	15 days
(subject to approval)		

4.4 A Manager requesting for cash communication must submit a written request, endorsed by his immediate superior, stating the exigency/ies and the period of his scheduled leave. Approved request for commutation shall be forwarded to Human Resources for processing.

4.5 The cash equivalent of the commutable VL credits shall be computed by multiplying the Manager's daily rate to the number of unused VL.

4.6 VL credits not used/availed within the two (2) years prescribed period (ie after the Manager's anniversary/hiring date) shall be forfeited.

5. Vacation Leave Without Pay

5.1 When all VL credits for the year have been used/availed and a Manager went on leave, the aggregate amount based employee's daily rate multiplied by the number of days leave shall be deducted from the Manager's salary.

SICK LEAVE (SL)

1. Eligibility

A Manager who has completed one year of service with the company inclusive of probationary period shall be entitled to avail of the sick leave with pay under this policy. Hence, sick leave filed during the first year of employment shall be without pay.

2. Sick Leave Credits

A Manager shall earn 1.25 days SL credit for each month or a total of 15 days a year.

3. Computation of Sick Leave Credits

On the Manager's anniversary or hiring date, the SL credits shall be computed as follows:

Illustration:

Employee "A" was hired in May 16, 2011

May 16, 2012 SL credits	=	15 days
Less SL used	=	(5) days
SL credits commutable to cash	=	10 days

4. All unused SL credits shall be commutable to cash after the Manager's 1st year with the Company. The cash equivalent of the commutable SL credits shall be computed by multiplying the Manager's daily rate to the number of unused SL.

5. Sick Leave Without Pay

5.1 When all SL credits for the year have been used/availed and a Manager went on SL, the aggregate amount based on employee's daily rate multiplied by the number of days leave shall be deducted from the Manager's salary.

OTHER GUIDELINES

1. All of these leaves serve a particular purpose. Under no circumstance shall one leave be applied in lieu of another.
2. All leave applications is subjected to approval of the Immediate Superior and/or Division/Department Head and shall be filed to Human Resources.
3. Leave taken without permission or approval is subject to disciplinary action.

4. Management reserves the right to require employees who to report to work due to business exigencies specifically when a Manager is on vacation leave.
5. An employee who is resigning from the Company may opt to apply the remaining vacation leave credits up to the last working day of his/her employment. However, terminal leaves may be taken but with no prejudice to the thirty (30) day advance notice that the Company requires.
6. All emergency leaves shall be charged to VL credits. Circumstances that would qualify as emergency are those unplanned, unforeseen and unwanted situations.
7. To allow sufficient time for scheduling of work, filing of vacation leave shall be based on the schedule below:
 - One half (½) day to two (2) days – one day advance notice
 - Three (3) days to one (1) week or five working days leave – one week advance notice.
 - Two (2) weeks and above – one month advance notice\
8. All Managers are encouraged to prepare a vacation leave plan within the next 6 months. This is to allow them to take time-off and manage their vacation leave accordingly.
9. A Manager may be separated from the Company when his SL without pay exceeds 180 days in a year. However, depending on the situation, this period shall be dealt with accordingly based on the agreed arrangement between the employee and the Company.
10. If a Manager did not report for work due to work-related injury or illness, he shall be paid accordingly and the number of days leave shall not be deducted from his SL credits.
11. Human Resources shall inform Managers of their available VL/SL credits every six (6) months. This is to manage their leave to avoid forfeiture (for VL).

IV. EXCEPTIONS

Exceptions to the policy must be approved by the President/OIC

V. ADMINISTRATION

CHQ-HR shall administer this policy


VI. EFFECTIVITY

This policy will take effect upon approval

REVIEW AND POLICY UPDATE

This policy is effective upon approval of President/OIC and will be reviewed/updated by CHQ-HR as maybe necessary. *The Company reserves the right to revise and/or revoke this policy as it deems fit or warranted.*

Control No. 66470

NOTICE OF RESULTS	 <p>Republic of the Philippines DEPARTMENT OF LABOR AND EMPLOYMENT Regional Office No. NCR</p>	Regional Office Address: 967 Maligaya Street, Malate, Manila Tel. No.: 400-6242		
		NAME OF OWNER/PRESIDENT/MANAGER <u>DAISY MEJIA</u>	NATURE OF BUSINESS <u>MINING</u>	DATE OF INSPECTION <u>2/26/21</u>
NAME OF ESTABLISHMENT <u>PENGUET CORPORATION</u>		ADDRESS OF ESTABLISHMENT <u>7F UNIVERSAL RE BUILDING</u> <u>106 PASSED DE ROXAS, MAKATI CITY</u>		

COMPLIANT ON BOTH GLS & OSHS PER DOCUMENTS PRESENTED, EMPLOYEES INTERVIEW, AND OCCULAR INSPECTION

Any questions on the above findings shall be submitted to this Office within five (5) days and correction thereof shall be done within ten (10) days for GLS violations and within the maximum period of three (3) months for OSHS violations from receipt of this Notice. This Notice shall be posted in the conspicuous area of the workplace. Unauthorized removal of this Notice by any person shall be dealt with labor laws. Further, making any false statement, report or record filed or kept pursuant to the provisions of the Labor Code is considered unlawful and therefore punishable with fine or imprisonment under Art. 303 of the renumbered Labor Code.

(Workers' Representative)
EXPLAINED TO AND RECEIVED BY:
Signature _____ Date 2/26/21
Printed Name MARIELYN D. CALLO
Position/Designation HR OFFICER

(Employer's Representative)
EXPLAINED AND RECEIVED BY:
Signature _____ Date 2/26/21
Printed Name DAISY A. MEJIA
Position/Designation _____

Employer's Statement:
() I will correct the above violation not later than _____
() I cannot correct violation for the following reasons: _____

INSPECTION CONDUCTED BY:

Signature _____
Labor Inspector DINA MARIBUQUE
Date 2/26/21

Documents Attached:

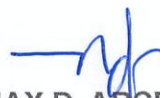
- Affidavit of employee/s interviewed
- Computation sheet for wages due
No. of sheets _____
- Restitution Payroll
- Payrolls
- Daily Time Records
- Employment Contracts
- Others, specify _____

CERTIFICATION

I, MAX D. ARCEÑO, Senior Vice President for Finance and Treasurer and Compliance Officer for Corporate Governance of BENGUET CORPORATION, a corporation duly registered under and by virtue of the laws of the Republic of the Philippines, with SEC Registration Number 11341 and with principal office at 7th Floor, Universal Re Building, 106 Paseo de Roxas, 1226 Makati City, Philippines, on oath state:

1. That I have caused this Integrated Annual Corporate Governance Report (I-ACGR) of the Company to be prepared;
2. That I have read and understood its contents which are true and correct based on my own personal knowledge and/or on authentic records;
3. That BENGUET CORPORATION will comply with the requirement set forth in SEC Notice dated May 12, 2021 to effect a complete and official submission of reports and/or documents through electronic mail;
4. That I am fully aware that submitted documents which require pre-evaluation and/or payment of processing fee shall be considered complete and officially received only upon payment of a filing fee; and
5. That the e-mail account designed by the Company pursuant to SEC Memorandum Circular No. 28 s. 2020 shall be used by the Company in its online submissions to CGFD and ICTD.

IN WITNESS WHEREOF, I have hereunto set my hand this MAY 30 2022 at Makati City.

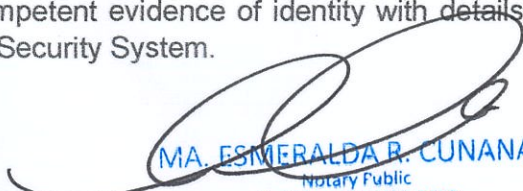


MAX D. ARCEÑO

Senior Vice President-Finance
and Treasurer and Compliance
Officer for Corporate Governance

SUBSCRIBED AND SWORN to before me this MAY 30 2022 at Makati City, Philippines, affiant exhibited to me his competent evidence of identity with details: CRN-0003-8205668-8 issued by the Philippine Social Security System.

Doc. No. 303 ;
Page No. 02 ;
Book No. XVII ;
Series of 2022.



MA. ESMERALDA R. CUNANAN
Notary Public
Until December 31, 2023
Appt. No. M-002 (2022-2023) Attorney's Roll No. 34562
M.C.E. Compliance No. VII-0004035/7-19-2021
PTR No. 8852113/1-3-2022/Makati City
IBP Lifetime Member Roll No. 05413
Ground Level, Dela Rosa Carpark I
Dela Rosa St. Legaspi Village,
Makati City