



## **Investor Relations Policy**

*(November 2020)*

DMCI Holdings, Inc. (“DMC” or “the Company”) and its subsidiaries are committed to providing the investing public with timely, fair and accurate material information, in accordance with the rules, regulations and guidelines of the Securities and Exchange Commission (“SEC”), Philippine Stock Exchange (“PSE”) and the DMC Board of Directors.

In line with this commitment, the Company has a dedicated Investor Relations Team (“IR Team”) to effectively execute its Investor Relations (“IR”) Policy and Program.

### **1. Introduction**

1.1. The investor relations function aims to enhance investors’ and analysts’ understanding of DMC by disclosing a fair and accurate picture of the Company’s financial situation, operations and business prospects.

To support sound valuation of the Company’s shares, the **IR Team** has full access to and works closely with the senior management of the Company, its subsidiaries and affiliate. Corollary to this, subsidiaries are strongly encouraged to designate coordinators who shall serve as data collection points for the IR Team.

The IR team also conveys analyst and investor sentiments and feedback to the DMC Board and senior management.

1.2. The **IR Policy** (“Policy”) provides guidance on how DMC intends to engage with the investing public.

It includes a framework of processes and procedures for keeping shareholders, investors and analysts informed of material developments about the Company. It also outlines how the Company determines materiality.

1.3. The **IR Program** (“Program”) is designed to be proactive, interactive and strategic. It provides reasonable access to both current and potential investors, analysts, fund managers, and the rest of the investing public using any of the forms below:

- Analyst Briefings
- Quarterly Earnings Reports
- Email Correspondence
- One-on-one Meetings
- PSE and SEC submissions
- Annual Reports
- Annual Stockholders' Meeting
- Company Website
- Investor Conferences/Roadshows

## 2. Covered Persons

This Policy applies to communications by a Director, Key Officer, Investor Relations Officer, or any employee possessing equivalent functions or any other designated employee who regularly communicates on behalf of the Company to any of the following categories of persons:

1. broker-dealers and their associated persons;
2. investment advisors, certain institutional investment managers and their associated persons;
3. investment companies, hedge funds and affiliated persons;

*Note: Categories a, b, and c include sell-side analysts, buy-side analysts, large institutional investment managers and other market professionals who may be likely to trade on the basis of selectively disclosed information.*

4. any holder of the Company's securities under circumstances in which it is reasonably foreseeable that such person would purchase or sell such securities on the basis of the information;
5. business reporters.

## 3. Materiality Determination

Events and information are deemed material if they are expected to affect the decision of a reasonable investor to buy or sell the stock or significantly alter the market price of the stock. Key examples of material information include, but are not limited to:

- Key earnings results ahead of financial announcements;
- Changes in revenue or earnings or key operating metrics guidance
- Guidance and projections of revenues, operating metrics, earnings
- News of a pending or proposed merger
- Significant changes in operations, i.e. new contracts won, planned shutdown of a plant or facility, shift in production
- Significant change in the corporate structure such as a re-organization

#### 4. Authority to Determine Materiality

The Board of Directors of the Company has authorized the Chief Executive Officer (“CEO”) or the Chief Compliance Officer (“CCO”) to determine the materiality of an event/information. All subsidiary and affiliate companies must promptly report material events and information to the CEO and CCO once they become aware of it.

The CEO or CCO, in consultation with the Corporate Secretary and IR Team, shall determine the materiality of the event/information and make the appropriate disclosures.

#### 5. Communication and Engagement Principles

5.1. DMC strives to disseminate relevant, material information to the investment community in a timely, clear, accurate and professional manner.

5.2. The Company communicates only through its designated primary and secondary spokespersons, which include the following:

Primary	Secondary
<ul style="list-style-type: none"><li>• Chairman and President</li><li>• Chief Finance Officer</li><li>• Vice President for Corporate Communications</li><li>• Investor Relations Officer</li></ul>	<ul style="list-style-type: none"><li>• Presidents of subsidiary and affiliate companies</li><li>• Chief Finance Officers of subsidiary and affiliate companies</li><li>• Designated resource persons of subsidiary and affiliate companies</li></ul>

5.3. DMC does not respond to rumors or market speculation. If rumors appear to contain material information, clarifications will be made through proper channels including, but not limited to, public disclosures.

The Company also reserves the right not to respond to inquiries related to competitiveness, privileged information or ongoing legal/regulatory proceedings.

5.4. For a period of two weeks prior to the planned disclosure of quarterly and full-year results, the IR Team will not comment or discuss matters related to said results.

5.5. Quarterly and full-year briefing materials shall be disseminated to analysts and investors after the Board Meeting. As far as practicable, the analyst briefing will be conducted the following business day.

5.6. The Company actively engages with analysts and investors through meetings or conference calls to help them understand the Company's businesses and operating fundamentals.

To ensure equal access to company information for all shareholders and other market participants, such meetings and conference calls shall be based on information that has already been made public.

Whenever the Company, or certain persons acting on its behalf, discloses MNPI during said meetings or conference calls, the Company must promptly issue a disclosure to the PSE of that same information.

## **6. REVIEW**

This Policy is subject to regular review and may be revised to suit changes in regulation, management direction and current best practices.

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