

DISCLOSURE POLICY

I. PURPOSE

The Disclosure Policy (“the Policy”) of DMCI Holdings, Inc. (the “Company”) outlines the procedures and practical guidelines for the consistent, transparent, regular and timely public disclosure and dissemination of material information about the Company and its subsidiaries.

II. SCOPE

This Policy covers the following:

1. All reports filed with the Securities and Exchange Commission (SEC) under the Securities Regulation Code (SRC) and its Implementing Rules and Regulations (IRR)
2. All reports filed with the Philippine Stock Exchange (PSE) under the PSE Disclosure Rules
3. All non-structured disclosures such as press releases, official company statements or reports, investor relations and media presentations, president’s report, or any material fact or event which would reasonably affect the market price of the Company
4. Electronic communications such as emails and Company’s website

III. RESPONSIBILITY

The Chief Compliance Officer (CCO) shall be responsible for implementing this Policy and ensuring compliance with the disclosure obligations.

He/She is also responsible for keeping the Board informed of all material developments and significant information disseminated to the investing public.

The CCO will closely coordinate with Corporate Communications, Finance, Investor Relations and relevant subsidiaries to prepare the disclosure to be disseminated to the investing public.

IV. DESIGNATED SPOKESPERSON

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

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

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V. MATERIAL INFORMATION

Material Information is any information relating to the business and affairs of the Company that results in or may reasonably be expected to affect investors' decisions in relation to the trading of the Company's shares.

The Company is required to disclose to the PSE once it becomes aware of any material information, corporate act or development of the Company and its subsidiaries, within ten minutes (10) from receipt of such information or the happening or occurrence of said act, development or event. Disclosure must be made to the PSE prior to its release to the news media.

However, the above rule shall not apply when the following instances are present:

1. The activity or development is still considered soft information.
2. The disclosure of the information would be in contravention to any existing laws of the land.

(PSE Disclosure Rules Section 4.1)

VI. CONFIDENTIALITY

The Board of Directors, Officers and employees of the Company and its subsidiaries are bound to confidentiality and must not leak any information before an official disclosure is made.

VII. FORWARD-LOOKING INFORMATION

Disclosures containing forward-looking statements must be accompanied by cautionary statements or disclaimer which cautions the readers that future results may differ.

VIII. TRADING RESTRICTIONS

The Company will impose a trading halt up to two (2) trading days from the date the material information is obtained by the directors, the management and employees of the Company and its subsidiaries.

IX. MONITORING AND OVERSIGHT OF THIS POLICY

The Corporate Governance Committee will review this Disclosure Policy from time to time and recommend updates to the Board, if necessary. Any material changes proposed to this Disclosure Policy will be subject to the approval of the Board.

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