

BPI International Finance Limited (“BPI IFL”) Disclosure of Sales-Related Information

1. Capacity

(a) Debt Securities

BPI IFL shall be acting as principal for entering into back-to-back Transaction (i.e. purchase/sell from/to a counterparty and sell/purchase to/from the client without taking any market risk) with the customers.

(b) List Securities / Exchange Traded Products

BPI IFL shall be acting as an agent of the customers for executing orders.

(c) Unlisted Funds

BPI IFL shall be acting as an agent of customers who subscribe to, switch or redeem units in unlisted funds issued/managed by third-party fund houses.

2. Affiliation

BPI IFL may distribute investment products which are issued by (i) BPI IFL, Bank of the Philippine Islands (“BPI”) and/or other BPI group companies; and/or (ii) product issuer with agent(s) appointed by the product issuer being BPI IFL, BPI and/or other BPI group companies. Customers may refer to the disclosure prior to or at the point of sale for information about the affiliation between BPI IFL and the relevant product issuer for the investment products purchased (if any).

3. Independence

BPI IFL will not be an independent intermediary whenever:

(a) BPI IFL, BPI and/or other BPI group companies receive fees, commissions, or any monetary or non-monetary benefits (whether directly or indirectly) from any third-party in return for BPI IFL distributing investment products (including debt securities, listed securities / exchange traded products, and unlisted funds) to customers; and/or

(b) BPI IFL has close links or legal or economic relationships with issuers of products that BPI IFL may distribute to you. Such investment products being distributed by BPI IFL mentioned in 3(a) above are issued by BPI IFL, BPI or other BPI group companies; OR BPI IFL, BPI or other BPI group companies have any role in such transactions mentioned in 3(a) above.

Otherwise than in the circumstances set out in 3(a) and 3(b) above (which are likely to impair the independence of BPI IFL to favour any particular investment product (or class thereof), any transaction, any execution venue or any product issuer), BPI IFL will be an independent intermediary.

If there is any special material interests in relation to any particular transaction(s), BPI IFL will take reasonable steps to inform you if deemed appropriate.

4. Disclosure of Monetary and Non-monetary Benefits

(a) Explicit Remuneration Arrangement

When BPI IFL enters into unlisted funds transactions for customers, it may receive commission and other fees from the fund houses (subject to the distribution agreement with individual product issuer) as illustrated below or as otherwise notified to customers prior to or at the point of entering into the relevant transaction(s).

	Commission receivable from fund manager	Remarks
Unlisted Funds	Up to 60.25% of the unlisted fund's management fees calculated based on customers' average fund holdings each month throughout the term of customers' investments	BPI IFL will receive from the fund house(s) an ongoing commission every year throughout the term of your investment as disclosed on the order acknowledgement email.

(b) Trading Profit made from Back-to-back Transaction

When BPI IFL enters into back-to-back principal transactions with customers, trading profit may be made as illustrated below or as otherwise notified to customers. The amount of such trading profit may vary from time to time depending on the size of the transaction, market demand and condition.

There could be price improvements on the prices quoted after BPI IFL received the customers' order instruction. BPI IFL will retain the additional trading profit associated with the price improvements fully/partially, as long as the total trading profit is within the maximum trading profit disclosed. However, if the total trading profit exceeds the maximum trading profit, BPI IFL will retain the additional trading profit associated with the price improvements partially and return the trading profit exceeding the maximum trading profit disclosed to customers.

	Maximum Trading Profit
Debt Securities	Not more than 0.50% of the total investment amount

(c) Non-explicit Remuneration Arrangement

BPI IFL will not receive monetary benefits (which are not quantifiable prior to or at the point of entering into the transaction) from the product issuer or its agents (directly or indirectly) for distributing an investment product or entering into a transaction.

(d) Non-monetary Benefits

BPI IFL will not receive non-monetary benefits (including goods and services in the form of soft dollars) from product issuer/fund manager or its agents for distributing an investment product or entering into a transaction.

5. Terms and Conditions under which Customers may Receive a Discount of Fees and Charges

The fees and charges of products and services provided by BPI IFL are posted on the website of BPI IFL and notified to customers from time to time. Discount of such fees and charges, if any, will be considered on a case-by-case basis at the absolute discretion of BPI IFL, taking into consideration various factors which include, but not limited to, the transaction size, market condition and costs.

If you have any questions about this disclosure, please contact your relationship manager.

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