

Asia-Pacific Medical Center Aklan, Inc. Preliminary Information Statement		
SEC Form 20-IS: Checklist of Requirements	SEC Comments	APMC Aklan Responses/ Justifications for Voluntary Corrections
<p>General Comment:</p> <p>1. Non-compliance shall constitute a violation of SRC Rule 20 and shall subject the company to appropriate penalty under the Consolidated Scales of Fines (SEC Memorandum Circular No. 6, Series of 2005).</p> <p>2. In addition to the Company's responses to SEC Comments through this Comment Sheet, kindly submit a marked-up copy highlighting the revisions made to comply with each comment.</p> <p>3. If the distribution of the copies of the notice of meeting, information statement and other documents in connection with the 2024 SM is via alternative mode, please be reminded that the Notice of Meeting shall be published in the business section of two (2) newspapers of general circulation, in print and online format, for two (2) consecutive days; Provided that, the last publication of the Notice of Meeting (print and online) shall be made no later than twenty-one (21) days prior to the scheduled SM.</p> <p>4. Please be reminded to submit hard copies of the PIS and the DIS at the MSRD office (17th Floor, The SEC Headquarters, 7907 Makati Avenue, Salcedo Village, Barangay Bel-Air, Makati City 1227)</p>	Please comply.	<p>To be complied after approval of the Information Statement</p> <p>Complied. Please see attached document.</p> <p>Compliance of publication on May 22 and 23 will be submitted within the week.</p> <p>Will be submitted within the week.</p>
SRC Rule 20.3.3.5 Information Statement and Management Report shall be uploaded to Issuer's Website for downloading by interested parties	Please upload SEC Form 20-IS and its attachments on the Company's website and send us (via msrdsubmission@sec.gov.ph) the link to access the uploaded DIS.	To be complied after approval
Notice of Meeting	Please submit	Compliance of publication on May 22 and 23 will be submitted within the week.
ITEM 4. VOTING SECURITIES & PRINCIPAL HOLDERS		
	(3) Voting Trust Holders of 5% or more:	
	(a) Title of Securities	
	(b) Amount of Securities Under Trust or Agreement	
	(c) Duration of the Agreement	
	(d) Names and Addresses of the Voting Trustees	Please disclose
	(e) Outline of Voting Rights and Other Powers of the Voting Trustees	
	(4) Description of any arrangement which may result in a change in control of registrant	
	If a change in control has occurred since the beginning of the last F.Y.	
	1. State the name of the person who acquired such control	Complied. Please see page 5 of DIS.
	2. Amount and source of consideration used	

	3. Basis of control		
	4. Date & description of the transaction(s) which resulted in the change in control	Please disclose the highlighted ones	Complied. Please see page 10 of DIS.
	5. Percentage of voting securities now beneficially owned directly/indirectly by the person who acquired control		
	6. Identify from whom control was assumed		
ITEM 5. DIRECTORS & EXECUTIVE OFFICERS		<p>Please submit a (1) certification of all nominees for independent director (for Dr. Buenaflor, Fernandez and Abayon) and a</p> <p>(2) certification that no directors or officers are connected with any government agencies or its instrumentalities.</p> <p>If there is/are person/s working in any government agency, notify them to submit a written permission from the head of department instead of a certification.</p>	<p>(1) Regina Buenaflor , Lemuel Fernandez and Romeo Abayon are not nominees for Independent Directors. See corrected Final List of Candidates attached as Annex C.</p> <p>(2) Complied. The written permission for Independent Directors are attached in their Certificate of Qualification. For regular directors working in government agencies, please see Annexes C2 and C3.</p>
If action is with respect to election of directors			
	Information required by Part I(C) of "Annex C, as amended"		
	1. Brief Description of Any Material Pending Legal Proceedings to which the registrant or any of its subsidiaries or affiliates is a party	Please disclose.	Complied. Please see page 16 of DIS.
	2. Name of the Court or Agency in which the Proceedings are pending		
	3. Date of Institution		
	4. Principal Parties		
	5. Description of the Factual Basis Alleged to Underlie the Proceeding		
	6. Relief Sought		
	7. Similar Information as to any such proceedings known to be contemplated by Governmental authorities or any other entity		
Information required by Part IV paragraphs (A), (D)(1) and (D)(3) of "Annex C, as			
A	(A)(1) Identify Directors, including Independent Directors and Executive	Please ensure completeness of information.	Complied. Confusion may have been caused by the failure to include the heading Nominees and Nominator in the Final List of Candidates. Please see page 9 and cross-reference with the corrected Final List of Candidates attached as Annex C.
	(a) List the names, ages and citizenship of all directors, including independent directors, executive officers and all persons nominated or chosen to become such where required under Section 38 of the Code and SRC Rule 38.1 adopted thereunder; also provide the names of the incorporators in the case of an investment company.		

SEC Form 20-IS: Checklist of Requirements		SEC Comments	
	(b) List of positions and offices such persons held or will hold;		
	(c) Term of office as a Director and the period which the person has served;		
	(d) Brief description of person's business experience (last five years); and		
	(e) Identification of other directorship held in reporting companies.		
(5) Part IV, Paragraphs (D)(1) and (D)(3) of "Annex C" as amended			
<i>Certain Relationships and Related Transactions</i>			
B	(B) If a director has resigned or declined to stand for re-election to the board of directors since the date of the last annual meeting of security holders because of a disagreement with the registrant on any matter relating to the registrant's operations, policies or practices, and if the director has furnished the registrant with a letter describing such disagreement and requesting that the matter disclosed, the registrant shall state the date of resignation or declination to stand for re-election and summarize the director's description of the disagreement.	Please disclose, if applicable.	Complied. No director has declined to stand for re-election. However, we have discussed the resignation of an Independent Director by reason of her appointment as Chief of Clinics. Please see page 16.
	If the registrant believes that the description provided by the director is incorrect or incomplete, it may include a brief statement presenting its views on the		
	In case of proxy solicitation and the same is made on behalf of persons other than the registrant, the aforementioned information need be furnished only the nominees of the persons making the solicitation.		
ITEM 6. COMPENSATION OF DIRECTORS & EXECUTIVE OFFICERS			
	(1) Summary Compensation Table	Please provide for estimated compensation for 2024.	Complied. Please see page 18.
	(a) Name and Principal Position (b) Year (c) Salary(P) (d) Bonus(P) (e) Other Annual Compensation		
ITEM 7. INDEPENDENT PUBLIC ACCOUNTANTS			
<i>Election, Approval or Ratification</i>			
	a.) Name of principal accountant selected/recommended If none, state so and describe the reason	Please provide what year was Mr. Richard Querido was first engaged for audit engagement.	Complied. Please see page 20.
	b.) Name of principal accountant for the FY most recently completed, if different		
	c.) (1) Indicate whether or not representatives are expected to be present		
	(2) Whether or not they have the opportunity to make a statement if they desire to do so		
	(3) Whether or not they are expected to be available to respond to appropriate questions		
Part III, paragraph (B) of "Annex C, as amended"			
<i>CHANGES IN AND DISAGREEMENTS WITH ACCOUNTANT ON ACCOUNTING AND FINANCIAL DISCLOSURE</i>		Please disclose.	Complied. Please see page 20.
	(1) Name of the previous accountant or the handling partner in case of a firm;		
	(2) Date of his resignation, dismissal or cessation from service;		

	(3) Reason/s for the cessation of service;		
	(3) Description of any disagreement on any matter of accounting principle or		
	(4) Letter from former accountant addressed to the Commission (exhibit)		
PART III.			
SIGNATURE PAGE			
	After reasonable inquiry and to the best of my knowledge and belief, I certify that the information set forth in this report is true, complete and correct. This report is signed in the City ofon.....,20.....	Please submit an updated one for every submission	Complied. Please see page 28.
	By: Signature		
	Name/Title		
MANAGEMENT REPORT			
2	Management's Discussion and Analysis (MD&A) or Plan of Operation (Required by Part III(A) of "Annex C, as amended")		
	(a) Full fiscal years		Complied. Please see page 15-19.
	(1) Discussion of the Registrant's Financial Condition, Changes in Financial Condition and Results of Operations for each of the last 3 fiscal years.		Complied. Please see page 15.
	(2) If FS shows losses from operation, explain the causes underlying these losses and the steps the registrant has taken or is taking to address these cause.	Please disclose.	Complied. Please see page 15.
	(4) Key Variable and Other Qualitative and Quantitative Factors.		Complied. Please see page 15-19.
	(vii) Causes for Any Material Changes from Period to Period of FS which shall include vertical and horizontal analyses of any material item (5%)	1. Please ensure completeness of explanation for <u>each material changes per line item</u> for each comparative period (eg. discussion for material change in Cost of Service, etc.)	Complied. Please see 20-26.
	(viii) Seasonal Aspects that has Material Effect on the FS	Please disclose, if applicable.	Complied. Please see page 29.
3	EXTERNAL AUDIT FEES (SEC MC No. 14, Series of 2004)		

SEC Form 20-IS: Checklist of Requirements		SEC Comments
	A. Under the caption Audit and Audit-Related Fees, the aggregate fees billed for each of the last two (2) fiscal years for professional services rendered by the	Complied. Please see page 31.
	2. Other assurance and related services by the external auditor that are reasonably related to the performance of the audit or review of the registrant's financial statements. The registrant shall describe the nature of the services comprising the fees disclosed under this category.	Please disclose, if applicable. Complied. Please see page 31.
	C. Under the caption "All Other Fees", the aggregate fees billed in each of the last two (2) fiscal years for products and services provided by the external auditor, other than the services reported under items (a) & (b) above. Registrants shall describe the nature of the services comprising the fees disclosed under this category.	Please disclose, if applicable. Complied. Please see page 31..
5	Market Price of and Dividends required by Part V of Annex C, as amended	
	1 Market Information	
	If the principal market is not an Exchange:	Please fully disclose
	(1) State the frequency with which trading occurs; if sporadic, so state;	Complied. Please see page 6.
	(2) Presentation of the Range of High and Low Bid Information for Each Quarter within the last two (2) fiscal years and any subsequent interim period for which Financial Statements are required by SRC Rule 68.	
	(a) (i) Approximate Number of Holders of Each Class of Common Security as of the latest practicable date but in no event more than 90 days prior to filing of report.	Please update to latest practicable date Complied. Please see page 7. Updated Discussion
	(ii) Names of the Top Twenty (20) Shareholders of Each Class	
	(iii) Number of Shares Held	
	(iv) Percentage of Total Shares Outstanding Held by Each	
7	Undertaking in bold face prominent type to provide without charge to each person solicited, on the written request of any such person, a copy of the registrant's annual report on SEC Form 17-A and shall indicate the name and address of the person to whom such a written request is to be directed. At the discretion of management, a charge may be made for exhibits, provided such charge is limited to reasonable expenses incurred by the registrant in furnishing such exhibits.	Please disclose in 20-IS Complied. Please see page 27.
AUDITED FINANCIAL STATEMENTS		
1	Statement of Management Responsibility on the Financial Statements	Please submit Complied. Please see 2023 AFS.
3	ADDITIONAL COMPONENTS OF FINANCIAL STATEMENTS (SRC Rule 68, as amended October 2011)	

	D.	A map of the conglomerate or group of companies showing the relationships between and among the company and its ultimate parent company, middle parent, subsidiaries or co-subsidiaries, and associates (Par 4(h))	Please comply, if applicable.	Complied. Please see Annex O. List of Interlocking Directors and Stockholders.
20-IS		VOLUNTARY CORRECTIONS		
	Page 2 Item No. 8	Date, time and place of the meeting of security holders		<ul style="list-style-type: none"> Corrected from http://www.asiapacificmedicalcenter-aklan.com/ASM2023/ to http://www.asiapacificmedicalcenter-aklan.com/ASM2024/
9.		Approximate date on which the Information Statement is first to be sent or given to security holders:		Amended to 23 May 2024.
Part 1	A. Item A (b)	General Information Date, time and place of meeting of security holders. Approximate date when the Information Statement is first sent out to stockholders of record:		Amended to 23 May 2024.
	B Item 4.(b) Item 5. Item 5. No. 3	Control and Compensation Voting Securities and Principal Holders Thereof 1. Security Ownership of Certain Record and Beneficial Owners 2. Security Ownership of Management Directors and Executive Officers Names, ages, citizenship of the Company's executive officers in addition to its executive officers and directors Involvement in Certain Legal Proceedings Certain Relationships and Related Transactions		Amended dates to 25 May 2024; 07 June 2024; 10 June 2024 Amended to 20 May 2024 Amended to 20 May 2024 Updated Positions. Updated the Executive officers. Updated discussion. Updated Note and Page No of the 2023 Audited Financial Statement.
	A.	Description of Business		Updated Discussion.
	D.	Corporate with leading Practices on Corporate Governance		Updated Discussion.
	Item 17.	Amendment of Charter, Bylaws or Other Documents Amendment of By-Laws		Added discussion.
	Item 18.	Other Proposed Action		Added Board Resolutions.

Annex A	Item II. No.7, No. 8 No.9 Item III. No. 2; No.3		Amended to7 June 2024. Amended to 11 June 2024 Amended to7 June 2024. Amended to 8-10 June 2024.
Annex B	2023-2024 Directors and Executive Officers Profile		Updated to include other appointments.
Annex C	Final List of Candidates		Added heading for Nominator; updated list of Nominators.

