

SEC FORM-ACGR (FOR PC/RI)

ANNUAL CORPORATE GOVERNANCE REPORT FOR PUBLIC COMPANIES AND REGISTERED ISSUERS

| 1. | For the fiscal year ended December 31, 2021 |
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| 2. | SEC Registration Number CS201506309 |
| 3. | BIR Tax Identification Number 008-994-370-000 |
| 4. | Exact Name of the Issuer as specified in its charter <u>AIB MONEY MARKET MUTUAL FUND, INC.</u> |
| 5. | Province, Country or other jurisdiction of incorporation or organization <u>Makati City. Philippines</u> |
| 6. | Address of Principal Office |
| | 11th floor, Multinational Bancorporation Centre 6805 Ayala Avenue, Makati City |
| 7. | Postal Code 1226 |
| 8. | Issuer's telephone number, including area code (632) 8588 4242 |
| 9. | Former name, former address, and former fiscal year, if changed since last report |
| | |
| 10. | Industry Classification Code (For SEC's use only) |

| RECOMMENDATION | COMPLIANT/ NON- COMPLIANT | ADDITIONAL INFORMATION | EXPLANATION |
|--|---------------------------------|--|--|
| | THE | BOARD'S GOVERNANCE RESPONSIBILITIES | William Color |
| rinciple 1. ESTABLISHING A COMPI | ETENT BOARD | | |
| he company should be headed by a co | mpetent, working | Board to foster the long-term success of the corporation, a | nd to sustain its competitiveness and gr |
| ecommendation 1.1 | ate objectives and | the long-term best interests of its shareholders/members | and other stakeholders. |
| The Board is composed of | | Source Links: | |
| directors with collective working | | Source Liliks: | |
| knowledge, experience or | COMPLIANT | Manual on Corporate Governance: | |
| expertise that is relevant to the | | https://aibmmmfi.com/2022/05/24/corporate- | |
| company's industry/sector. | | governance-documents/ BOD Credentials: | |
| The Board has an appropriate mix | COMPLIANT | https://aibmmmfi.com/about/ | |
| of competence and expertise. | COMPLIANT | neeps.//aibitititititi.com/about/ | |
| Directors remain qualified for | | Board is composed of individuals with extensive | |
| their positions individually and | | experience in the banking sector and capital markets. | |
| collectively to enable them to fulfill their roles and | | There is first the state of the | |
| i oros arra | COMPLIANT | Two of the directors are resource speaker/lecturer for various SEC concerns and fixed income resource courses. | |
| responsibilities and respond to the needs of the organization. | de Fil Ellini | various 3EC concerns and fixed fricolife resource courses. | |
| the freeds of the organization. | | All directors possess all the qualifications, and none of | |
| | | the disqualifications of directors in an investment | |
| | | company as required under the SRC and ICA. | |
| ecommendation 1.2 | | | |
| The Board is headed by a | | Source link: | |
| competent and qualified | COMPLIANT | Chairman of the BOD Credentials: | |
| Chairperson. | | https://aibmmmfi.com/about/ | |
| commendation 1.3 | | | |
| The company provides a policy on | | Source Link: | |
| training of directors. | | | |
| | COMPLIANT | Manual on Corporate Governance: | |
| | | https://aibmmmfi.com/2022/05/24/corporate- | |

governance-documents/

| 2 | The company has an orientation program for first-time directors. | COMPLIANT | Source link: | |
|---|---|-------------------|---|--|
| 3 | The company has relevant annual continuing training for all directors. | COMPLIANT | Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ Directors attend in-house seminars on AMLA, Data Privacy Act, and updates on other relevant laws and regulation. | |
| B | ecommendation 1.4 | The second second | | |
| 1 | The Board has a policy on board diversity. | COMPLIANT | Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ BOD Credentials: https://aibmmmfi.com/about/ Competence and qualification, apart from the requirements of the SRC and ICA, are the main consideration in nominating/electing the members of the board. The board is composed of four (4) male directors and one (1) female director. Four of them are bankers, while one is from the regulator side. Finally, age diversity has also been considered as the board is a mixed of both young and old individuals. | |
| | commendation 1.5 | | | |
| 1 | The Board is assisted by a Corporate Secretary. | COMPLIANT | Source Link: | |
| 2 | The Corporate Secretary is a separate individual from the Compliance Officer. | COMPLIANT | Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ 2021 Definitive Information Statement: | |
| 3 | The Corporate Secretary is not a member of the Board of Directors. | COMPLIANT | https://aibmmmfi.com/2022/05/24/sec-regulatory-reports/ BOD & Key Officers Credentials: https://aibmmmfi.com/about/ | |
| 4 | The Corporate Secretary attends annual training/s on corporate governance. | COMPLIANT | Corporate Secretary attends seminar on Corporate Governance and other related topics at least once a year and in-house seminars on AMLA, Data Privacy Act and others. Hours spent are approximately 20 hours | |

| R | ecommendation 1.6 | | | | |
|-----|--|-------------------|--|--|--|
| 1 | The Board is assisted by a Compliance Officer. | COMPLIANT | | | |
| 2 | The Compliance Officer has a rank of Senior Vice-President or an equivalent position with adequate stature and authority in the corporation. | COMPLIANT | | | |
| 3 | The Compliance Officer is not a member of the board. | NON- COMPLIANT | Source Link: Key Officers: https://aibmmmfi.com/about/ | The Compliance Officer is the CEO of the fund. The fund has not operated ror solicited investments from the public since it secondary license was granted by the Commission back in December 2018. With protecting the interest of the public in mind, the CEO is on top otall Compliance concerns to ensure that issues are fully resolved and/or complied with. To date, only the CEO hasthe C.O. license required for this post. Once the Fund has settled all its deficiencies with the Commission, the fund will appoint a new Compliance Officer. | |
| 4 | The Compliance Officer attends annual training/s on corporate governance. | COMPLIANT | Compliance Officer attends seminar on Corporate Governance and in-house seminars on AMLA, Data Privacy, and other related laws and regulations. Hours spent are approximately 20 hours | | |
| | | | | | |
| | inciple 2. ESTABLISHING CLEAR RO | | | | |
| lec | The fiduciary roles, responsibilities, and accountabilities of the Board, as provided under the law, the company's articles of incorporation and bylaws, and other | | | | |
| Re | legal pronouncements and guidelines should be clearly made known to all directors as well as to shareholders/members and other stakeholders. Recommendation 2.1 | | | | |
| 1 | The Directors act on a fully informed basis, in good faith, with | | Source Link: | | |
| | due diligence and care, and in the best interest of the company, shareholders and stakeholders. | COMPLIANT | Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ | | |

| | Recommendation 2.2 | | |
|------------|---|-----------|--|
| | The Board oversees the development and approval of the company's business objectives and strategy. | COMPLIANT | The business objective is straight forward, and that is to invest in Peso-denominated short-term securities or fixed-income instruments representing high-quality, liquid debt and monetary instruments. |
| 2 | The Board oversees and monitors the implementation of the company's business objectives and strategy. | COMPLIANT | Source Link: Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate-governance-documents/ (Please see Article 4, Section B of the MCG) |
| R | ecommendation 2.3 | | |
| 1 | effective succession planning program for directors, key officers and management. | COMPLIANT | Source Link: Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- |
| 2 | The Board adopts a policy for the retirement of directors and key officers. | COMPLIANT | governance-documents/ (Please see Article 4, Section B of the MCG) |
| March 1999 | commendation 2.4 | | |
| 1 | The Board aligns the remuneration of key officers and board members with the longterm interests of the company. | COMPLIANT | |
| 2 | The Board adopts a policy specifying the relationship between remuneration and performance. | COMPLIANT | Source Link: Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ |
| 3 | The Directors do not participate in discussions or deliberations involving his/her own remuneration. | COMPLIANT | Bovernance documents/ |

| Recommendation 2.5 | | | |
|---|-----------|--|--|
| 1 The Board has a formal and transparent board nomination and election policy. | | | |
| 2 The Board nomination and election policy is disclosed in the company's Manual on Corporate Governance. | COMPLIANT | Source Link: Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ 2021 Definitive Information Statement: https://aibmmmfi.com/2022/05/24/sec-regulatory- reports/ | |
| 3 The Board nomination and election policy includes how the company accepted nominations from shareholders/members. | COMPLIANT | | |
| 4 The Board nomination and election policy includes how the board reviews the qualifications of nominated candidates. | COMPLIANT | | |
| The Board nomination and election policy includes an assessment of the effectiveness of the Board's processes in the nomination, election or replacement/removal of a director. | | | |
| 6 The Board has a process for identifying the quality of directors/trustees that is aligned with the strategic direction of the company. | COMPLIANT | | |

| Berne . | ecommendation 2.6 | | | |
|----------|--|-----------|---|--|
| 1 | The Board has overall responsibility in ensuring that there is a policy and system governing related party transactions (RPTs) and other unusual or infrequently occurring transactions. | COMPLIANT | Source link: Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ | |
| 2 | The RPT policy includes appropriate review and approval of material RPTs, which guarantee fairness and transparency of the transactions. | COMPLIANT | The only RPT was the payment of the pre-operating expenses incurred by the company prior 2021 that was advanced by AIB. | |
| AND DE G | ecommendation 2.7 | | | |
| 1 | The Board is primarily responsible for approving the selection of Management, led by the Chief Executive Officer (CEO) or his/her equivalent, and the heads of the other control functions (Chief Risk Officer, Chief Compliance Officer and Chief Audit Executive, as may be applicable). | COMPLIANT | | AlB Money Market Mutual Fund, Inc. does not have these officers but the Boards of the Fund and the Fund Manager (FM) are primarily responsible in the selection of these officers. |
| 2 | The Board is primarily responsible for assessing the performance of Management, led by the CEO or his/her equivalent and the heads of the other control functions (Chief Risk Officer, Chief Compliance Officer and Chief Audit Executive, as may be applicable). | COMPLIANT | | The Boards of the AlB Money Market Mutual Fund, Inc. and the FM are both responsible. |

| Recommendation 2.8 1 The Board establishes an effective performance evaluation framework that includes a standard or criteria for assessment and ensures that Management's performance is on par with the standards set by the Board and Senior Management. | COMPLIANT | Source Link: | |
|--|-----------|--|--|
| The Board establishes an effective performance evaluation framework that includes a standard or criteria for assessment and ensures that personnel's performance is on par with the standards set by the Board and Senior Management. | COMPLIANT | Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ | |
| Recommendation 2.9 | | | |
| The Board ensures that an appropriate internal control system is in place. | COMPLIANT | | |
| The internal control system includes a mechanism for monitoring and managing potential/actual conflicts of interest of the board members/trustees, management and shareholders/members. | COMPLIANT | Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ | |
| The Board adopts an Internal Audit Charter. | COMPLIANT | Source Link: Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ | |

| Recommendation 2.10 | | | |
|---|--------------------|--|--|
| The Board ensures that the company has in place a sound enterprise risk management (ERM) framework to effectively identify, monitor, assess and manage key business risks. | COMPLIANT | Source Link: | |
| 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 | Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ | |
| Recommendation 2.11 | | | |
| The Board has a Board Charter that formalizes and clearly states its roles, responsibilities and accountabilities in carrying out its fiduciary duties. | COMPLIANT | Source Link: | |
| The Board Charter serves as a guide to the directors/trustees in the performance of their functions. | COMPLIANT | Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ | |
| The Board Charter is publicly available. | COMPLIANT | | |
| | | | |
| Principle 3. ESTABLISHING BOARD Co | OMMITTEES | | |
| The board committees should be set up | to the extent poss | sible to support the effective performance of the Board's functions, particularly with respect to audit, | |
| risk management, compliance and other key corporate governance concerns, such as nomination and remuneration. The composition, functions and responsibilities of all the board committees should be contained in their respective board committee charters. | | | |

responsibilities of all the board committees should be contained in their respective board committee charters.

Recommendation 3.1

| 1 | The Board establishes board | | |
|---|-----------------------------------|-----------|--|
| | committees that focus on specific | | Manual on Corporate Governance: |
| | board functions to aid in the | COMPLIANT | https://aibmmmfi.com/2022/05/24/corporate- |
| | optimal performance of its roles | | governance-documents/ |
| | and responsibilities. | | |

| | Recommendation 3.2 | | |
|---|---|-----------|--|
| | The 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. | COMPLIANT | Source Link: Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ |
| 2 | The Audit Committee is composed of at least three (3) qualified non-executive directors, the majority of whom, including the Chairperson, are independent directors. | COMPLIANT | Source Link: Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ |
| 3 | All the members of the committee have relevant background, knowledge, skills, and/or experience in the areas of accounting, auditing and finance. | COMPLIANT | Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ 2021 Definitive Information Statement: https://aibmmmfi.com/2022/05/24/sec-regulatory- reports/ |
| 4 | The Chairperson of the Audit Committee is not the Chairperson of the Board or of any other committee. | COMPLIANT | Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ 2021 Definitive Information Statement: https://aibmmmfi.com/2022/05/24/sec-regulatory- reports/ |

| R | ecommendation 3.3 | | |
|----|---|-----------|---|
| 1 | 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 | Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ 2021 Definitive Information Statement: https://aibmmmfi.com/2022/05/24/sec-regulatory- reports/ |
| 2 | The Corporate Governance Committee is composed of at least three (3) members, majority of whom, including the Chairperson, should be independent directors. | COMPLIANT | Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ 2021 Definitive Information Statement: https://aibmmmfi.com/2022/05/24/sec-regulatory- reports/ |
| Re | commendation 3.4 | | |
| 1 | The 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 | Source Links: Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate-governance-documents/ |
| | The BROC is composed of at least three (3) members, the majority of whom should be independent directors, including the Chairperson. | COMPLIANT | Source Links: Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ |
| | At least one member of the BROC has relevant thorough knowledge and experience on risk and risk management. | COMPLIANT | Source Links: Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ |

| | Recommendation 3.5 | | |
|----|--|--|--|
| 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 | Source Links: Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- |
| 2 | The Committee Charters provide standards for evaluating the performance of a committee and its members. | COMPLIANT | governance-documents/ |
| D | rinciple 4. FOSTERING COMMITME | NIT | |
| re | sponsibilities, including sufficient tin | any, the directors and to be familiar wi | should devote the time and attention necessary to properly and effectively perform their duties and th the corporation's business. |
| - | ecommendation 4.1 | | |
| 1 | The Directors attend and actively participate in all meetings of the Board, Committees and shareholders/members in person or through tele-/videoconferencing conducted in accordance with the rules and regulations of the Commission. | COMPLIANT | Source Link: Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ |
| 2 | The Directors review meeting materials for all Board and Committee meetings. | COMPLIANT | |
| 3 | The Directors ask the necessary questions or seek clarifications and explanations during the Board and Committee meetings. | COMPLIANT | This can be found in the Board minutes. |

| I | lecommendation 4.2 | | |
|----|--|---------------------|--|
| | concurrently serve in not more than ten (10) public companies and/or registered issuers. If concurrently sitting in at least three (3) publicly listed companies, the maximum concurrent directorships shall be five (5) public companies and/or registered issuers. | COMPLIANT | Source Link: 2021 Definitive Information Statement: https://aibmmmfi.com/2022/05/24/sec-regulatory-reports/ |
| | ecommendation 4.3 | | |
| 1 | The Directors notify the company's board before accepting a directorship in another company. | COMPLIANT | Source link: Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ |
| | | | |
| P | rinciple 5. REINFORCING BOARD IN | DEPENDENCE | |
| TI | ne Board should endeavor to exercise | an objective and ir | idependent judgment on all corporate affairs. |
| | ecommendation 5.1 | | |
| 1 | The Board is composed of a majority of non-executive directors who possess the necessary qualifications. | COMPLIANT | Source Link: BOD Composition: https://aibmmmfi.com/about/ 2021 Definitive Information Statement: https://aibmmmfi.com/2022/05/24/sec-regulatory- reports/ |
| Re | commendation 5.2 | | |
| 1 | The Board has at least two (2) independent directors or such number as to constitute one-third (1/3) of the board, whichever is higher. | COMPLIANT | Three (3) out of five (5) directors are independent Source Link: BOD Composition: https://aibmmmfi.com/about/ 2021 Definitive Information Statement: https://aibmmmfi.com/2022/05/24/sec-regulatory-reports/ |

| R | ecommendation 5.3 | | |
|----|---|-----------|---|
| 1 | | COMPLIANT | Source Link: BOD Composition: https://aibmmmfi.com/about/ 2021 Definitive Information Statement: https://aibmmmfi.com/2022/05/24/sec-regulatory- reports/ |
| R | ecommendation 5.4 | | |
| 1 | The company perpetually bars an independent director from serving in such capacity after the term limit of nine (9) years. | COMPLIANT | Source link: Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ |
| 2 | In the instance that the company retains an independent director in the same capacity after nine (9) years, the Board provides meritorious justification and seeks shareholders'/members' approval during the annual regular meeting. | COMPLIANT | The company only started in 2015 |
| Re | commendation 5.5 | | |
| 1 | The positions of Chairperson of the Board and Chief Executive Officer (or its equivalent) are held by separate individuals. | COMPLIANT | Source Link: BOD and Key Officers: https://aibmmmfi.com/about/ 2021 Definitive Information Statement: https://aibmmmfi.com/2022/05/24/sec-regulatory- reports/ |
| 2 | The Chairperson of the Board and Chief Executive Officer (or its equivalent) have clearly defined responsibilities. | COMPLIANT | Manual on Corporate Governance: https://aibmmnifi.com/2022/05/24/corporate-governance-documents/ |
| T | commendation 5.6 | | |
| 1 | The Board designates a lead director among the independent directors if the Chairperson of the Board is not an independent director. | COMPLIANT | Source Link: Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ |

| Recommendation 5.7 | | |
|--|----------------------|--|
| The Directors/Trustees with material interest in a transaction affecting the corporation fully disclose his/her adverse interest, abstain from taking part in the deliberations for the same, and recuse from voting on the approval of transaction. | COMPLIANT | No director has material interest in a transaction affecting the fund. |
| Recommendation 5.8 | | |
| 1 The non-executive directors (NEDs) have separate periodic meetings with the external auditor and heads of the internal audit, compliance, and risk functions, without any executive directors present. | COMPLIANT | Source Link: Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ |
| The meetings are chaired by the lead independent director, if applicable. | COMPLIANT | governance-documents/ |
| | | |
| Principle 6. ASSESSING BOARD PERFO | | |
| The best measure of the Board's effective | eness is through a | an assessment process. The Board should regularly carry out evaluations to appraise its performance |
| as a body, and assess whether it possess | ses the right mix of | backgrounds and competencies. |
| Recommendation 6.1 | | |
| The Board conducts an annual self-assessment of its performance as a whole. | COMPLIANT | |
| 2 The Chairperson conducts an annual self-assessment of his performance. | COMPLIANT | Upon their election, all directors conduct an annual self- |
| 3 The individual members conduct a self-assessment of their performance. | COMPLIANT | assessment of its performance as a whole. |
| 4 Each committee conducts a self-assessment of its performance. | COMPLIANT | |

| F | lecommendation 6.2 | | | |
|---|--|---------------------|--|---------|
| 1 | The Board has in place a system that provides, at the minimum, criteria and process to determine the performance of the Board, individual directors/trustees and committees. | COMPLIANT | Source Link: Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- | |
| 2 | The system allows for a feedback mechanism from the shareholders/members. | COMPLIANT | governance-documents/ | |
| | rinciple 7. STRENGTHENING BOARI | | | |
| | ie Board directors are duty-bound to | apply high ethicals | standards, taking into account the interests of all stakeho | olders. |
| 1 | ecommendation 7.1 | | | |
| | The Board adopts a Code of Business Conduct and 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 board members. | COMPLIANT | Source Link: Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate-governance-documents/ It will be uploaded in the company website next quarter. | |
| 2 | The Code is properly disseminated to the members of Board. | COMPLIANT | Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate-governance-documents/ It will be uploaded in the company website next quarter. | |
| 3 | The Code is disclosed and made available to the public through the company website. | COMPLIANT | Source Link: Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ It will be uploaded in the company website next quarter. | |

| Recommendation 7.2 | | |
|---|--------------------|--|
| The Board ensures the proper and efficient implementation and monitoring of compliance with the Code of Business Conduct and Ethics. | COMPLIANT | Source Link: Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ |
| | | DISCLOSURE AND TRANSPARENCY |
| Principle 8. ENHANCING COMPANY D | ISCLOSURE POLI | |
| The Board should establish corporate regulatory expectations. | disclosure policie | es and procedures that are practical and in accordance with generally accepted best practices and |
| Recommendation 8.1 | | |
| The Board establishes corporate disclosure policies and procedures to ensure a comprehensive, accurate, reliable and timely report to shareholders/members and other stakeholders that gives a fair and complete picture of a company's financial condition, results and business operations. | COMPLIANT | Source Link: Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ |
| Recommendation 8.2 | | |
| The company has a policy requiring all directors to disclose/report to the company any dealings in the company's shares within five (5) business days. | COMPLIANT | Source Link: 2021 Audited Annual Financial Statements: https://aibmmmfi.com/2022/05/24/sec-regulatory- |
| The company has a policy requiring all officers to disclose/report to the company any dealings in the company's shares within five (5) business days. | COMPLIANT | reports/ Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ |

| R | ecommendation 8.3 | | |
|------------------|--|--|--|
| 1 | The company's corporate governance policies, programs and procedures are contained in its Manual on Corporate Governance (MCG). | COMPLIANT | Source Link: Manual on Corporate Governance: |
| 2 | The company's MCG is submitted to the SEC. | COMPLIANT | https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ |
| 3 | The company's MCG is posted on the company website. | COMPLIANT | |
| R | commendation 8.4 | | |
| 1 | The company's corporate governance policies and practices and all relevant information are disclosed in its Annual Corporate Governance Report (ACGR). | COMPLIANT | Source Link: 2021 ACGR: https://aibmmmfi.com/2022/05/24/corporate- |
| 2 | The company's ACGR is submitted to the SEC. | COMPLIANT | governance-documents/ |
| 3 | The company's ACGR is posted on the company website. | COMPLIANT | For uploading once submitted to the Commission. |
| Pr | inciple 9. STRENGTHENING EXTER | NAL AUDITOR'S U | NDEPENDENCE AND IMPROVING AUDIT QUALITY |
| Th | e company should establish standar | eds for the engraph | into coloction of an automal and it. |
| ex | ernal auditor's independence and en | us for the appropr thance audit quality | iate selection of an external auditor, and exercise effective oversight of the same to strengthen the |
| a designation of | commendation 9.1 | And the second | |
| 1 | The Audit Committee has a robust process for approving and recommending the appointment, reappointment, removal, and fees of external auditors. | COMPLIANT | Source Link: Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ |
| 2 | The appointment, reappointment, removal, and fees of the external auditor is recommended by the Audit Committee, approved by the Board and the shareholders/members. | COMPLIANT | Source Link: 2021 Definitive Information Statement: https://aibmmmfi.com/2022/05/24/sec-regulatory-reports/ |

| 3 | For the removal of external auditor, the reasons for such removal or change are disclosed to the SEC, the shareholders/members, and the public through the company website and required disclosures. | COMPLIANT | The external auditor of the Company has been its auditor since 2018. | |
|----|---|-----------|--|--|
| R | ecommendation 9.2 | | | |
| 1 | The Audit Committee Charter includes the Audit Committee's responsibility on: 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. | COMPLIANT | Source Link: Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ | |
| 2 | The Audit Committee Charter contains the Committee's responsibility on reviewing and monitoring the external auditor's suitability and effectiveness on an annual basis. | COMPLIANT | | |
| Re | commendation 9.3 | | | |
| 1 | The company discloses the nature of non-audit services performed by its external auditor in the Annual Report to manage potential conflict of interest cases. | COMPLIANT | No non-audit service was performed by the external auditor. | |

| 2 | The 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 | Source Link: Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ |
|----|--|---------------------|--|
| P | rinciple 10. INCREASING FOCUS ON | NON-FINANCIAL | AND SUSTAINABILITY REPORTING |
| | | | erial and reportable non-financial and sustainability issues. |
| R | ecommendation 10.1 | | The state of the s |
| 1 | The Board has a clear and focused strategy on the disclosure of nonfinancial information. | COMPLIANT | Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ |
| 2 | The company discloses to all shareholders/members and other stakeholders the company's strategic and operational objectives with emphasis on the management of environmental, economic, social and governance (EESG) issues of its business which underpin sustainability. | COMPLIANT | Source Link: Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ |
| | | | |
| Th | | ehensive and cost-e | ST-EFFICIENT ACCESS TO RELEVANT INFORMATION efficient communication channel for disseminating relevant information. This channel is crucial for an other interested users. |
| | commendation 11.1 | | |
| 1 | The company has a website to ensure a comprehensive, costefficient, transparent and timely manner of disseminating relevant information to the public. | COMPLIANT | Website: https://aibmmmfi.com/ |

| P | rinciple 12 STRENCTHENING INTE | | CONTROL AND RISK MANAGEMENT FRAMEWORKS |
|----|---|-------------------|--|
| | rinciple 12. STRENGTHENING INTE to ensure the integrity, transparency a | | and RISK MANAGEMENT SYSTEMS Ince in the conduct of its affairs, the company should have a strong and effective internal control system |
| a | nd enterprise risk management system | m. | mee in the conduct of its affairs, the company should have a strong and effective internal control system |
| R | ecommendation 12.1 | | |
| 1 | effective internal control system in the conduct of its business. | COMPLIANT | Source Link: Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ Prospectus: https://drive.google.com/file/d/1tze56bZjYUAfKbnthk 2WPCNFmhXGuqKM/view |
| 2 | The company has an adequate and effective enterprise risk management framework in the conduct of its business. | COMPLIANT | Source Link: 2021 Annual Report: https://aibmmmfi.com/2022/05/24/sec-regulatory-reports/ |
| | ecommendation 12.2 | | |
| 1 | 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 | It will be provided by the parent company. |
| | CUL | FIVATING A SYN | ERGIC RELATIONSHIP WITH SHAREHOLDERS/MEMBERS |
| | inciple 13. PROMOTING SHAREHOI | LDER/MEMBER R | IGHTS |
| Th | e company should treat all sharehold | ers/members fairl | y and equitably, and also recognize, protect and facilitate the exercise of their rights. |
| Re | commendation 13.1 | | |
| 1 | The Board ensures that basic shareholder/member rights are disclosed in the Manual on Corporate Governance. | COMPLIANT | Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ |

| F | ecommendation 13.2 | | |
|----|---|-----------|--|
| | The Board encourages active shareholder participation by sending the Notice of Annual and Special Shareholders'/Members' Meeting with sufficient and relevant information at least twenty-one (21) days before the meeting. | COMPLIANT | Source Link: 2021 Definitive Information Statement: https://aibmmmfi.com/2022/05/24/sec-regulatory-reports/ |
| IR | ecommendation 13.3 | | |
| 1 | shareholder/member participation by making the result of the votes taken during the most recent Annual or Special Shareholders'/Members' Meeting publicly available the next working day. | COMPLIANT | Source Link: 2021 Current Report: https://aibmmmfi.com/2022/05/24/sec-regulatory-reports/ |
| 2 | The minutes of the Annual and Special Shareholders'/Members' Meetings were made available on the company website within five (5) business days from the date of the meeting. | COMPLIANT | |
| R | ecommendation 13.4 | | |
| 1 | The Board makes available, at the option of a shareholder/member, an alternative dispute mechanism to resolve intra-corporate disputes in an amicable and effective manner. | COMPLIANT | Source Link: Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ |
| R | commendation 13.5 | | |
| 1 | The Board establishes an Investor Relations Office (IRO) or Customer Relations Office (CRO) or its equivalent to ensure constant engagement with its shareholders/members. | COMPLIANT | Source Link: Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate- governance-documents/ |

| The IRO or CRO or its equivalent is present at every shareholders'/members' meeting. | COMPLIANT | Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate-governance-documents/ | |
|---|--|---|--|
| D | | DUTIES TO STAKEHOLDERS | |
| Principle 14. RESPECTING RIGHTS O | F STAKEHOLDER | S AND EFFECTIVE REDRESS FOR VIOLATION OF ST | AKEHOLDER'S RIGHTS |
| and/or interests are at stake, stakehold | l by law, by contra lers should have th | actual relations and through voluntary commitments se opportunity to obtain prompt effective redress for t | must be respected. Where stakeholders' right |
| Recommendation 14.1 | Veta Action | | the violation of their rights. |
| The Board identifies the company's various stakeholders and promotes cooperation between them and the company in creating wealth, growth and sustainability. | COMPLIANT | Source Link: Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate-governance-documents/ | |
| Recommendation 14.2 | | | |
| The Board establishes clear policies and programs to provide a mechanism on the fair treatment, protection and enforcement of the rights of stakeholders. | COMPLIANT | Source Link: Manual on Corporate Governance: https://aibmmmfi.com/2022/05/24/corporate-governance-documents/ | |
| Take the second | | | |
| rinciple 15. ENCOURAGING EMPLOY | | | and the second of the second o |
| mechanism for employee participation bjectives and good corporate governar | on should be deve | loped to create a symbiotic working environment co | onsistent with the realization of the company's |
| ecommendation 15.1 | ice goals. | | |
| The Board establishes policies, programs and procedures that encourage employees to actively participate in the realization of the company's goals and in its governance. | NON- COMPLIANT | | AIB Money Market Mutual Fund, Inc. has no employees, as it is being operated by the FM. |

| I | ecommendation 15.2 | | | | | |
|---|--|-------------------|---|--|--|--|
| 1 | The Board sets the tone and makes a stand against corrupt practices by adopting an anticorruption policy and program in its Code of Business Conduct and Ethics. | NON- COMPLIANT | AIB Money Market Mutual Fund, Inc. has no employees, as it is being operated by the FM. | | | |
| 2 | and program to employees across the organization through trainings to embed them in the company's culture. | NON- COMPLIANT | AIB Money Market Mutual Fund, Inc. has no employees, as it is being operated by the FM. | | | |
| R | Recommendation 15.3 | | | | | |
| 1 | The Board establishes a suitable framework for whistleblowing that allows employees to freely communicate their concerns about illegal or unethical practices, without fear of retaliation. | NON- COMPLIANT | AIB Money Market Mutual Fund, Inc. has no employees, as it is being operated by the FM. | | | |
| 2 | The 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. | NON- COMPLIANT | AIB Money Market Mutual Fund, Inc. has no employees, as it is being operated by the FM. | | | |
| 3 | The Board supervises and ensures the enforcement of the whistleblowing framework. | NON- COMPLIANT | AIB Money Market Mutual Fund, Inc. has no employees, as it is being operated by the FM. | | | |

| Principle 16. ENCOURAGING SUSTA | INARII ITY AND | SOCIAL RESPONSIBILITY |
|---------------------------------|----------------|------------------------|
| Little to Eucookadiaa 3031 | HIMADILI I AND | A SOCIAL VESLONSIBILLI |

The company should be socially responsible in all its dealings with the communities in which 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 | The 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

With the assistance of its fund manager, the fund has formulated a financial literacy program that aims to assist the government in enhancing the financial capability and inclusion in the country.

Robert Charles M. Lehmann

Chairman

Augusto M. Cosio Jr. Independent Director Servando B. Alvarez Yr.
President/Compliance Officer

Atty. Justina F. Callangan Independent Director **Stanley L. Saguinsin**Corporate Secretary

Vicente Julian A. Sarza Independent Director

SUBSCRIBED AND SWORN to before me this _______, affiants exhibiting their valid government identification cards as indicated below:

| NAME | COMPETENT EVIDENCE OF IDENTITY | DATE / PLACE ISSUED |
|----------------------------|----------------------------------|------------------------------|
| Robert M. Lehmann | Passport / P3954980A | Aug. 17, 2017 / Manila |
| Servando B. Alvarez Jr. | UMID / CRN 0003-8309275-1 | 7 |
| Augusto M. Cosio Jr. | UMID / CRN 0111-2594016-7 | |
| Atty. Justina F. Callangan | UMID / CRN 006-0055-9875-7 | |
| Vicențe Julian A. Sarza | Passport / P3061244B | Oct. 3, 2019 / DFA NGR South |
| Stanley L. Saguinsin | Driver's License / N11-84-041478 | |

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101 Urban Ave. Campos Rueda Bldg. Brgy. Pio Del Pilar, Makati City