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## Top Frontier Investment Holdings, Inc. TFHI

**PSE Disclosure Form 17-3 - Request for Extension to File SEC Form 17-A**  
***References: SRC Rule 17, SEC Memorandum Circular No. 7 Series of 2008 and Section 17.2 and 17.8 of the Revised Disclosure Rules***

<b>For the fiscal year ended</b>	Dec 31, 2019
<b>Deadline of Submission of Annual Report</b>	Apr 14, 2020

### Reason for requesting extension to submit Annual Report

Pursuant to SEC Memorandum Circular No. 5, series of 2020 (12 March 2020) and the SEC Notice Relaxing the Requirements for Requests for Extension in the Filing of Annual Reports and/or Audited Financial Statements (18 March 2020), by reason of the enhanced community quarantine being implemented in Metro Manila and in other parts of the Philippines due to the COVID-19 outbreak, Top Frontier Investment Holdings, Inc. (the "Corporation") submitted on 02 April 2020 its request to the Securities and Exchange Commission through its Markets and Securities Regulation Department (via msrd\_covid19@sec.gov.ph) for an extension of time to file its SEC Form 17-A on or before 15 May 2020.

Despite such request for extension, the Corporation informed the SEC that it anticipates to hold its Annual Stockholders Meeting on 09 July 2020, pursuant to its Amended By-laws.

### Other Relevant Information

Please see attached.

***The Company undertakes to submit the report within fifteen (15) calendar days after the prescribed deadline or upon submission of the report to the Securities and Exchange Commission, whichever is earlier. The Company understands that failure to comply with the undertaking may result to the imposition of applicable penalty/ies and/or sanction/s.***

**Filed on behalf by:**

<b>Name</b>	Irene Cipriano
<b>Designation</b>	Assistant Corporate Secretary



02 April 2020

**SECURITIES AND EXCHANGE COMMISSION**

Secretariat Building, PICC Complex,  
Roxas Boulevard, Pasay City

Attention: **DIR. VICENTE GRACIANO P. FELIZMENIO, JR.**  
Markets and Securities Regulation Department

Re: **Top Frontier Investment Holdings, Inc.**  
*SEC Registration Number: CS200803939*  
**Request for Extension of Time to File SEC Form 17-A**

Gentlemen:

We write in connection with the submission by **Top Frontier Investment Holdings, Inc.** (the "Corporation") of its 2019 Annual Report and the 2019 Audited Financial Statements, together with the 2019 Sustainability Report of the Corporation (collectively, the "SEC Form 17-A Documents"), which are originally due for filing with the Securities and Exchange Commission ("SEC") and Philippine Stock Exchange, Inc. ("PSE") on or before 14 April 2020.

As a result of the COVID-19 outbreak, the Philippine Government has declared a state of public health emergency throughout the Philippines and placed Metro Manila and other parts of the Philippines under the enhanced community quarantine ("ECQ") until 12 April 2020, which has significantly limited the mobility of persons, including the employees of the Corporation and its subsidiaries, and resulting to the disruption and/or temporary suspension of the normal domestic and foreign business operations of the Corporation and its subsidiaries. All these, coupled with the strict travel restrictions and the mandated work-from-home arrangements being implemented, continue to pose specific challenges on the timely completion of the preparation, statutory audit, and finalization by the Corporation of its SEC Form 17-A Documents.

Pursuant to SEC Memorandum Circular No. 5, series of 2020 (12 March 2020) and the SEC Notice Relaxing the Requirements for Requests for Extension in the Filing of Annual Reports and/or Audited Financial Statements (18 March 2020), the Corporation respectfully requests your good office for an extension of time to file its SEC Form 17-A Documents on or before **15 May 2020**. Consequently, the Corporation likewise requests that the filing of its Quarterly Financial Report for the 1<sup>st</sup> Quarter of 2020 (under SEC 17-Q) to be extended as well, subject to the relevant regulations which the SEC may promulgate on the matter.

With regard to the **Annual Stockholders' Meeting** of the Corporation, we wish to advise that the Corporation anticipates that it be held, as originally scheduled, on **09 July 2020**, pursuant to the Amended Bylaws of the Corporation. The details of the Annual Stockholders' Meeting shall be timely disclosed to the SEC and PSE after the same have been approved by the Board of Directors of the Corporation in their next meeting scheduled in May 2020.

We assure you that the Corporation is doing its best to file its SEC Form 17-A Documents by 15 May 2020, as requested herein, in anticipation of the lifting of the ECQ as originally scheduled. However, in the event that the ECQ is extended *beyond* 12 April 2020, the Corporation shall be constrained to: (a) request for a further extension of the filing of the SEC Form 17-A Documents within the period as may be allowed by the SEC, and (2) postpone its Annual Stockholders' Meeting accordingly, subject to the subsequent announcements and regulations which the SEC may issue as a result of such unfortunate eventuality.

In the meantime, we are one with you in praying for the COVID-19 situation to improve and we look forward to your favorable action to the aforementioned request.

Truly yours,  
**Top Frontier Investment Holdings, Inc.**

By:

A handwritten signature in black ink, appearing to be 'V. Jacinto', is written over a light gray rectangular background.

**Virgilio S. Jacinto**  
Corporate Secretary