

24 April 2025

The Philippine Stock Exchange, Inc.
 6/F, PSE Tower,
 28th Street corner 5th Avenue
 Bonifacio Global City, Taguig City

Attention: **Atty. Marigel M. Baniqued-Garcia**
Head, Issuer Regulation Division

Re: **Reply with Request for Reconsideraion on Letter dated 22 April 2025 re: Non-compliance with Structured Reportorial Requirements**

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Ladies and Gentlemen:

We respectfully acknowledge and reply to the letter dated 22 April 2025 in connection with the submission of the reportorial requirements to the Exchange, particularly, the 2024 Annual Report that was timely filed by Atlas Consolidated Mining and Development Corporation (“AT” or the “Company”) on April 15, 2025 but was rejected by the Philippine Stock Exchange, Inc. (“PSE” or the “Exchange”) due to lack of Statement of Management Responsibility (SMR) and material discrepancy in the figures indicated in the disclosure template and was subsequently approved after complying with the findings on April 16, 2025.

We respectfully note that as earlier explained by our Head of Corporate Legal Affairs, Compliance and Corporate Governance, Atty. Axel G. Tumalak, our filing on 15 April 2025 actually includes the notarized SMR. Unfortunately, it was inadvertently omitted in the updated filing on the following day which reflected the changes we made pursuant to the PSE findings on the amount of the Total Current Assets for 2024 compared to 2023 figures, which was due to the reclassification of a portion of the total input VAT from noncurrent to current assets.

We take this opportunity to respectfully explain that the reclassification was in line with paragraph 68 of PAS 1, *Presentation of Financial Statements* wherein a portion of the total input VAT in 2023 was also reclassified to form part of the Total Current Assets to align the comparative information with the current year’s AFS (please see below breakdown):

Description	CY 2024 (AFS)	CY2023 (reclass)	CY2023 (AFS)
ASSETS			
Current Assets			

Cash and Cash equivalents (Note 4)	Php 2,260,587	Php 1,704,117	Php 1,704,117
Trade and other receivables (Note 5)			
At fair value through profit or loss	265,344	389,232	389,232
At amortized cost - net	58,396	60,921	60,921
Inventories (Note 7)	1,053,523	1,011,040	1,011,040
Derivative Assets (Note 6)	87,620	-	-
Other Current Assets (Note 8)	<u>2,202,162</u>	<u>1,095,281</u>	<u>718,035</u>
Total Current Assets	5,927,632	4,260,591	3,833,345
Non-current Assets			
Property, plant and equipment (Note 9)			
At Cost	32,929,902	32,887,641	32,887,641
At amortized cost - net	1,376,962	1,375,720	1,375,720
Mining Rights (Note 10)	6,324,383	6,666,209	6,666,209
Goodwill (Note 10)	19,026,119	19,026,119	19,026,119
Investments in Associates (Note 12)	267,185	297,302	297,302
Deferred Mine Exploration Costs (Note 11)	200,257	192,403	192,403
Deferred Tax Assets - net (Note 26)	936,388	740,344	740,344
Other non-current assets (Note 13)	<u>2,870,458</u>	<u>2,782,429</u>	<u>3,159,675</u>
Total Non-current Assets	Php 69,859,286	Php 68,228,758	Php 64,345,413
TOTAL ASSETS	Php 69,859,286	Php 68,228,758	Php 68,228,758

We humbly submit that the reclassification of the input VAT as part of the Total Current Assets for both 2024 and 2023 AFS did not affect the value of the Total Assets reported during the said audit periods. We therefore respectfully urge the Honorable Department to please reconsider its finding of material discrepancy in such figures we indicated in the disclosure template. AT will never disclose financial reports that are not duly verified and audited by our external auditors and without the necessary approval by our Board of Directors.

In view of the foregoing, we respectfully request for the reconsideration of *Eighty-Five Thousand Pesos (Php 85,000.00)* being imposed by the Exchange. Rest assured that AT will continue to strictly abide by and observe the Rules of the PSE.

Thank you very much.

Respectfully yours,

**Atlas Consolidated Mining and
Development Corporation**

By:


Rodyardo B. Rañada

Chief Finance Officer and Chief Risk
Officer and Compliance Officer