



APC GROUP INC.

INTERNAL AUDIT and COMPLIANCE ATTESTATION

For the year ended December 31, 2018

The undersigned President and Chief Executive Officer/Chief Risk Officer, Executive Vice President and Chief Financial Officer/Treasurer/Compliance Officer, and the Chief Audit Executive/ Internal Audit Head attest to the overall adequacy and effectivity of the internal control and compliance systems that are in place and functioning as intended in APC Group Inc., audited for the year ended December 31, 2018.

This is in accordance with APC Group Inc.'s corporate governance and compliance related policies and programs, prevailing best practices in corporate governance, and on the basis of the procedures performed in accordance with the annual internal audit plan, which was reviewed by the Audit Committee. This Attestation complies with the recommendation under Principle No. 12 of the Code of Corporate Governance for Publicly-Listed Companies, as provided in the SEC Memorandum Circular No. 15, Series of 2017.

ANNA JOSEFINA G. ESTEBAN

Chief Audit Executive
Internal Audit Head

IAN JASON R. AGUIRRE

Executive Vice President, Chief Financial Officer
Treasurer, Compliance Officer,

JACKSON T. ONGSIP

President, Chief Executive Officer
Chief Risk Officer