



111122013001366



## SECURITIES AND EXCHANGE COMMISSION

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**Receipt Date and Time** : November 12, 2013 11:28:16 AM  
**Received From** : Head Office

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Doc Source

Company Information

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**SEC Registration No.** PW0000015A  
**Company Name** ROXAS HOLDINGS, INC DOING BUSINESS UNDER THE NAME AND STYLE OF CADP GROUP

**Industry Classification**  
**Company Type** Stock Corporation

**Document Information**

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**Document ID** 111122013001366  
**Document Type** LETTER/MISC  
**Document Code** LTR  
**Period Covered** November 11, 2013  
**No. of Days Late** 0  
**Department** CED/CFD/CRMD/MRD/NTD  
**Remarks**

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R O X A S H O L D I N G S , I N C .

(Company's Full Name)

6 F C G B U I L D I N G , 1 0 1 A G U I R R E  
S T R E E T , L E G A S P I V I L L A G E  
M A K A T I C I T Y

(Business Address: No. of Street City/Town/Province)

ATTY. FLORENCIO M. MAMAUAG, JR.

810-8901

Letter

September 30  
Month Day  
Fiscal Year

Form Type

Month Day  
Annual Meeting

Secondary License Type, If Applicable

Department Requiring this Document

Amended Articles Number/Section

Total Amount of Borrowings

Total No. of Stockholders

Domestic

Foreign

TO BE ACCOMPLISHED BY SEC PERSONNEL CONCERNED

File Number

LCU

Document I.D.

Cashier

STAMPS

Remarks = pls. Use black ink for scanning purposes

11 November 2013

**ATTY. JUSTINA CALLANGAN**  
Acting Director  
Corporate Governance and Finance Department  
11<sup>th</sup> Floor, SEC Building  
EDSA, Greenhills, Mandaluyong City

Subject: Posting of ACGR in the Company's Website

Dear Atty. Callangan,

This refers to your letter dated 24 October 2013, which was received by Roxas Holdings, Inc. (RHI) on 11 November 2013, directing the company to explain why it should not be held liable for violation of SEC Circular No. 18, Series of 2013, dated 02 October 2013.

In connection thereto, please be advised that the company was not able to post its Annual Corporate Governance Report (ACGR) in its website as required by the aforementioned SEC Circular No. 18 because it was not aware of the issuance of the Circular. The company only came to know of the existence of the Circular when it received today, 11 November 2013, your letter directing the company to explain why it should not be held liable for violation thereof.

In view thereof, the company would like to request your kind indulgence and to excuse the company for not complying with the directive as the same was not intentional and was not committed in utter disregard of the order of the Commission and/or to mislead the investing public. RHI undertakes to post the ACGR in the website as soon as possible.

Your kind consideration will be greatly appreciated.

Very truly yours,



**ATTY. FLORENCIO M. MAMAUAG, JR.**  
Asst. Corp. Secretary & Compliance Officer