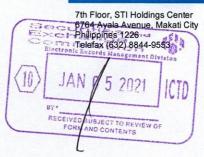
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5 January 2021

SECURITIES AND EXCHANGE COMMISSION

Head Office, Secretariat Building PICC Complex, Roxas Boulevard, Pasay City

Attention: Corporate Governance Department

Re: Compliance with SEC Memorandum Circular No. 20,

Series of 2013

Gentlemen:

Please find enclosed the Certification dated 4 January 2021 issued to Dr. Leonora Vasquez-de Jesus, Independent Director of STI Education Systems Holdings, Inc., as the co-facilitator in the Corporate Governance Webinar Course conducted by Risks, Opportunities Assessment and Management (ROAM), Inc., in compliance with SEC Memorandum Circular No. 20, Series of 2013.

We trust that you will find our submission in order.

Very truly yours,

ARSENIO C. CABRERA, JR.
Corporate Secretary

CERTIFICATION

This is to certify that Dr. Leonora Vasquez-de Jesus was the co-facilitator in the Corporate Governance Webinar Course conducted by Risks, Opportunities Assessment and Management (ROAM), Inc. on November 6, 13, and 26, 2020 via Zoom and Microsoft Teams Meeting.

This certification is issued upon the request of Dr. de Jesus for whatever purpose it may serve.

BENJAMIN I. ESPIRITU, Ph.D.

President

4 January 2021