



V I T A R I C H

September 02, 2013

PHILIPPINE STOCK EXCHANGE

3rd Floor, Philippine Stock Exchange Plaza
Ayala Triangle, Ayala Avenue
Makati City

Attention: **MS. JANET A. ENCARNACION**
Head - Disclosure Department

Gentlemen:

We submit herewith the Corporation's response to the letter of the Securities and Exchange Commission dated July 8, 2013 on the comments and findings on the audited financial statements for the year ended December 31, 2011.

Thank you.

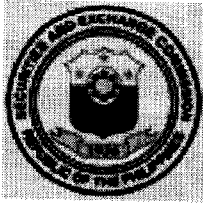
Very truly yours,

VITARICH CORPORATION

Alicia G. Danque
Alternate Corporate Information Officer



109022013001346



SECURITIES AND EXCHANGE COMMISSION

SEC Building, EDSA, Greenhills, Mandaluyong City, Metro Manila, Philippines
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V I T A R I C H

September 02, 2013

JUSTINA F. CALLANGAN
Director
Corporate Finance Department
Securities and Exchange Commission
SEC Building, EDSA, Greenhills
Mandaluyong City 1554

Re: 2011 Audited Financial Statements

Dear Director Callangan:

We refer to your letter dated July 8, 2013, which we received on August 28, 2013, advising the 2011 Audited Financial Statements is not in full compliance with SRC Rule 68 and 68.1.

In compliance with the letter, we enclosed herewith a copy of the Company's response on the findings and comments.

We Trust that you will find the explanation satisfactory.

Very truly yours,

VITARICH CORPORATION

PÉDRO T. DABÚ, JR.
Assistant Corporate Secretary/Corporate Information Officer

August 28, 2013

VITARICH CORPORATION

AUDITED FINANCIAL STATEMENTS

December 31, 2011

COMPONENTS OF FINANCIAL STATEMENTS	Brief Description of Non-Compliance <i>(See applicable rule/standard as cited, for complete reference)</i>	RESPONSE OF COMPANY
Receivable	Incomplete disclosures, i.e., nature and amount of items comprising "Other Receivables" indicated in Note 7 (PAS 1).	<u>Disclosure Provided</u> Nature of "Other Receivables" was provided in Note 7 indicating that this comprise of advances to suppliers and related parties, insurance receivables arising from claims for typhoon and other damages and outstanding receivables arising from incidental income of the Company such as tolling and rentals. The amount and status of insurance receivable (the most significant component) was discussed lengthily.



Republic of the Philippines
Department of Finance
SECURITIES AND EXCHANGE COMMISSION
SEC Building, EDSA, Greenhills, Mandaluyong City 1554

CORPORATION FINANCE DEPARTMENT

July 8, 2013

MR. ROGELIO M. SARMIENTO
President
VITARICH CORPORATION
McArthur Highway
Abangan Sur
Marilao, Bulacan

Dear Mr. Sarmiento:

This refers to the Office of the General Accountant's (OGA) findings on the company's 2011 Audited Financial Statements.

Below is the result of its evaluation of the company's explanation on the said findings:

Findings	Result of Evaluation
The lack of the amount of each item comprising "Other Receivables" was not addressed. There was a violation of PAS 1 and SRC Rule 68, as amended	Material disclosure deficiency (the account represents 32% of the Total Non-Current Assets)

The company is directed to show cause within five (5) days from actual receipt of this letter why it should not be held liable for non-compliance with the required disclosures under SRC Rule 68 and 68.1

Very truly yours,


JUSTINA F. CALLANGAN
Acting Director