



INSIDER TRADING POLICY

Introduction

This Insider Trading Policy sets out the implementing rules and guidelines for Directors, Officers and employees engaging in the trading (buying and/or selling) of the Company's shares of stock in the market.

Policy

It is the General Policy of the Company that Directors, Officers and employees who have knowledge, from time to time, of material inside information concerning the Company, which have not been disclosed to the public, including any information likely to affect the share market price are prohibited in the trading of the Company's shares.

Covered Persons

The following are covered by this Policy, to wit:

- Board of Directors;
- Corporate Secretary;
- Officers and members of the Management Committee;
- Employees who are made aware of undisclosed material information; and
- Members of the immediate families of Directors, Key Officers and all other Covered Persons

Material Information

Information, whether positive or negative, is deemed to be material if there is a reasonable likelihood that it would be considered important to an investor in making a decision regarding the purchase or sale of shares of stock and/or price sensitive. Such material information includes, but is not limited to:

- Financial results
- Projections of future earnings or losses
- Change in the corporate structure such as a re-organization
- Acquisition/Divestitures/Joint Ventures
- Dividend declaration and changes in dividend policy
- Stock splits
- New significant equity investments or debt offerings
- Major changes in key senior management positions
- Plans to repurchase securities or go to the public with a new issue
- Adjustments of reported earnings
- News of a pending or proposed merger
- Solvency problems which may arise from litigation, final judgments, loan
- Public or private sale of Company shares
- Such other matters or information that may affect corporate activity in organization

Restrictions

All Directors Officers, Employees and Covered Persons are strictly prohibited from trading during the following periods:

- ✓ **Structured Disclosures** – Within Five (5) trading days before and within Three (3) trading days after the disclosure of quarterly (SEC17Q) and annual (SEC 17A) financial results;
- ✓ **Non-Structured Disclosures** – Within Three (3) trading days before and within Three (3) trading days after the disclosure of any material information other than the abovementioned structured disclosure;

Compliance

Strict compliance is hereby enforce to all.

Reporting Policy

Directors and Key Officers are required to report their trades of the Company's shares within three (3) business days

All other Covered Persons are required to report their trades on a quarterly basis.

Non-Compliance

Violation of this Policy shall be subject to disciplinary action under the Company's Code of Conduct, without prejudice to any civil or criminal proceedings which the Company or regulators may file for violation of existing laws.

Insider Trading under the law may be subject to penalty for damages or fine and/or imprisonment. Please refer to Section 61 of the Securities Regulation Code to secure information on the penalties/damages that may arise in violation of the Insider Trading Law.

Review

This Policy will be reviewed at least annually. Any subsequent amendment or modification will be reported to the Audit Committee for approval.