



INSIDER TRADING
POLICY

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A. Prohibition of Insider Trading

Cirtek Holdings Philippines Corporation (the “Company”) prohibits insider trading and abusive dealing. The Company strictly enforces and monitors compliance with this Policy, which prohibits the buying or selling of the Company’s securities (common and preferred shares) during prescribed periods by covered persons, which include members of the Board of Directors, all members of the Company’s Management, consultants, advisers, and other employees who have been made aware of undisclosed material information with respect to the Company and its operations. This restriction is expanded to include the immediate family members of the parties mentioned.

Any change in the personal shareholdings in the Company of the directors and key officers resulting from open market transactions are reported to the Securities and Exchange Commission and The Philippine Stock Exchange, Inc. within specified deadlines.

B. Black-out Period for Trading of Company Securities

In line with this Policy, the Company practices a trading black-out period which covers five (5) trading days before and three (3) trading days after the date of disclosure to the public of the Company’s quarterly and annual financial results.

For non-structured disclosures (*i.e.*, material information other than the quarterly and annual financial results of the Company), the trading black-out period covers three (3) trading days before and three (3) trading days after the disclosure to the public of any such material information other than the Company’s quarterly and annual financial results.

C. Review of the Policy

The Corporate Governance and Compliance Committee of the Board of Directors, having oversight authority over this Policy, shall conduct an annual review and assessment of this Policy, and may recommend any amendments as it deems appropriate for the approval of the Board of Directors.