



## **DISCLOSURE AND TRADING POLICY OF FIRST PHILIPPINE HOLDINGS CORPORATION**

First Philippine Holdings Corporation (“FPH” or the "Company") upholds the principles of honesty, integrity, and transparency in conducting business. In line with the Company Manual for Corporate Governance and applicable laws, rules and regulations, the Company hereby adopts this Disclosure and Trading Policy covering all Company directors, officers and employees with knowledge of material non-public information. Such directors, officers and key employees shall observe, and ensure compliance with, this Policy.

This Policy is to serve as a guide in determining whether a trading activity involving FPH securities is unlawful and on the disclosure of trading transactions.

### **Prohibited Acts**

Directors, officers, employees and their respective representatives shall not buy or sell FPH securities while in possession of material information which is not yet generally available to the public. Information shall be deemed material if such information is reasonably expected to affect investors' decisions in relation to the Company's securities. Information shall be deemed not to have been generally available to the public if such has not yet been disclosed to the Securities and Exchange Commission, the Philippine Stock Exchange, Inc., or other relevant institutions as mandated by law. They are also prohibited from communicating such material non-public information to any person who will likely trade (buy or sell) FPH securities due to or while in possession of such information.

### **Period Covered**

This runs from the time a director, officer or employee acquires knowledge of such material non-public information and until two (2) full trading days after such information has been made public.

Any act, attempt or allegation of prohibited insider trading shall be treated seriously and dealt with appropriately and swiftly. In handling any case of prohibited insider trading, the Company shall be guided by the Company Manual for Corporate Governance, the Employee Code of Discipline, the Securities Regulation Code, and other relevant laws and regulations pertaining to the said subject.

Any act or attempt by a director, officer or employee to commit prohibited insider trading should be reported to the Human Resources Department, the Internal Audit Group or the employee's immediate supervisor. The procedure for reporting and the protection

afforded by the Company Whistleblower Policy shall apply in each instance of reported prohibited insider trading.

### **Trading Blackout**

The trading blackout covers directors, covered officers and any employee who is an insider as defined by law. During the trading blackout, no covered person can trade in FPH securities from the time material non-public information is obtained and up to two (2) full trading days after the price-sensitive information is disclosed.

### **Reportorial Requirements for Trading of Securities**

Directors and Principal Officers (CEO, COO, CFO) and Board-appointed corporate officers (including Vice Presidents and up) of FPH should report covered trading activities to the Philippine Stock Exchange/Securities and Exchange Commission within the reglementary period using the required forms. Covered persons should report the: a) number and kind of securities acquired/disposed; b) date acquired/disposed; and c) price of securities acquired or disposed.

After trading, the Director or Officer should report his transaction/s to the Office of the Corporate Secretary within three (3) business days.

[The Compliance Officer shall be responsible for the implementation of the Disclosure and Trading Policy.]

*For further inquiries, please contact:*

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Office of the Corporate Secretary**  
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