

INSIDER TRADING POLICY

All directors, officers, employees and consultants of **Seafont Resources Corporation** (SPM), its affiliates and subsidiaries who have access to proprietary, confidential information or information not known to the public are disallowed to use or share such information for stock trading purposes or for any other purposes except the conduct of their business. Use of non-public information for personal financial benefit or share the information with others who may make an investment decision based on such information, is not only unethical but also illegal.

Rules of Procedure

A. Scope of Policy

1. All directors, officers, employees and consultants of SPM, its affiliates and subsidiaries, who have knowledge of proprietary or material information about the Corporation that is not disclosed or generally available to the public, shall not trade in the Philippine Stock Exchange (PSE) SPM securities or disclose non-public information to any person and/or entity. This applies even if the disclosure and trading is done via a third person.

2. This Insider Trading Policy must be observed until the proprietary or material information is publicly disclosed and a lapse of five (5) full trading days from day of disclosure.

Proprietary or Material information includes, but is not limited to the following:

- financial figures;
- projections of revenue or losses;
- pending projects;
- changes in the corporate structure;
- acquisitions/divestments/joint ventures;
- dividend declaration and changes in dividend policy;
- stock splits;
- new significant equity investments or debt offerings;
- significant litigation exposure;
- major changes in key senior management positions;
- public or private sale of company securities

The Compliance Officer will post announcements for non-trading periods other than those mentioned above.

The sale of shares acquired from options is subject to the above-mentioned non-trading periods. However, the exercise of stock options may be done at any time even during non-trading periods.

B. Disclosure

1. All Directors, Executives and Officers from Managers and above, including the Comptroller, Chief Internal Auditor, Chief Risk Officer, Treasurer, Corporate Secretary and Assistant Corporate Secretary, shall report their trading activities to the Compliance Officer within five (5) business days from day of trade.
2. All other officers and employees shall likewise report to the Compliance Officer within ten (10) days from the end of each quarter all their trading activities for SPM securities.
3. Violation of the Insider Trading Policy shall be subject to disciplinary action, without prejudice to any civil or criminal proceedings, which the Corporation or regulators may file for violation of existing laws.

C. Effectivity

This policy becomes effective upon approval of the Board.¹

¹ This Policy will be presented to the appropriate Board Committee and will then be endorsed to the Board of Directors for Approval / Ratification.