	INSIDER TRADING POLICY	Version No.	1.0
		Page	Page 1 of 6
RASLAG CORP.			

Version	:	1.0
Effectivity Date	:	04.30.2022
Reviewed and Endorsed by	:	Corporate Governance Committee
Approved by	:	Board of Directors
Approval Date	:	April 4, 2022

**RASLAG CORP.
INSIDER TRADING POLICY**

I. INTRODUCTION


RASLAG CORP. (the “Company”) is fully committed to comply with all the laws, rules and regulations related to its business operations including compliance with the Insider Trading rules prescribed under the Securities Regulation Code (“SRC”) of the Philippines or Republic Act No. 8799 and the other rules promulgated by the Securities and Exchange Commission (“SEC”) and the Philippine Stock Exchange, Inc. (“PSE”).

As part of its commitment to ensure proper compliance with regulations and to align the Blackout Period policy with the industry’s best practices, this Insider Trading Policy (“Policy”) is hereby adopted to guide the Company and its directors, officers, employees and their associates in the trading of the Company’s shares.

II. DEFINITION OF TERMS

Beneficial Owner or Beneficial Ownership - any person who, directly or indirectly, through any contract, arrangement, understanding, relationship or otherwise, has or shares voting power, which includes the power to vote, or to direct the voting of such security; and/or investment returns or power, which includes the power to dispose of, or to direct the disposition of such security; provided, however, that a person shall be deemed to have an indirect beneficial ownership interest in any security which is:

1. held by members of his immediate family sharing the same household;
2. held by a partnership in which he is a general partner;
3. held by a corporation of which he is a controlling shareholder; or
4. subject to any contract, arrangement or understanding which gives him voting power or investment power with respect to such securities;

	INSIDER TRADING POLICY	Version No.	1.0
		Page	Page 2 of 6
RASLAG CORP.			

provided, however, that the following persons or institutions shall not be deemed to be beneficial owners of securities held by them for the benefit of third parties or in customer or fiduciary accounts in the ordinary course of business, so long as such shares were acquired by such persons or institutions without the purpose or effect of changing or influencing control of the Issuer:


- a. a broker dealer;
- b. an investment house registered under the Investment Houses Law;
- c. a bank authorized to operate as such by the Bangko Sentral ng Pilipinas;
- d. an insurance company subject to the supervision of the Office of the Insurance Commission;
- e. an investment company registered under the Investment Company Act;
- f. a pension plan subject to regulation and supervision by the Bureau of Internal Revenue and/or the Office of the Insurance Commission or relevant authority; and
- g. a group in which all of the members are persons specified above.

All securities of the same class beneficially owned by a person, regardless of the form such beneficial ownership takes, shall be aggregated in calculating the number of shares beneficially owned by such person.

A person shall be deemed to be the beneficial owner of a security if that person has the right to acquire beneficial ownership within thirty (30) days, including, but not limited to, any right to acquire: through the exercise of any option, warrant or right; through the conversion of any security; pursuant to the power to revoke a trust, discretionary account or similar arrangement; or pursuant to automatic termination of a trust, discretionary account or similar arrangement.

Blackout Period – the period within which an Insider is prohibited from buying or selling, directly or indirectly, listed and publicly traded shares of the Company

Consultants and Advisers- refers to persons or entities that may or may not have a formal contract of service but may advise Management or the Board on certain matters.

	INSIDER TRADING POLICY	Version No.	1.0
		Page	Page 3 of 6
RASLAG CORP.			

Corporate Governance Committee - means the committee in the Company responsible for corporate governance.

Directors - means the members of the Board of Directors as elected by the shareholders of the Company

Employees - means those listed in the Company's plantilla other than Officers

Insider- covers any of the following persons in the Company:


1. All members of the Board of Directors
2. All Officers of the Company
3. All supervisors and managers of the Company
4. Consultants and Advisers of the Company
5. All other Employees of the Company with regular access to material information which are not yet publicly disclosed
6. All the respective secretaries and executive assistants of the above
7. Relatives of the above persons, as defined below

Management - means the group of executives given the authority by the Board of Directors to implement the policies it has laid down in the conduct of the business of the Company

Material Non-Public Information - refers to any information which (a) has not been generally disclosed to the public and would likely affect the market price of the Company's shares after being disseminated to the public and the lapse of a reasonable time for the market to absorb the information, or (b) would be considered by a responsible person important under the circumstances in determining his course of action whether to buy, sell or hold a security.

While it is not possible to define all categories of material information, there are various types of information that are particularly sensitive and, as a general rule, should always be considered material in nature, unless properly cleared by the concerned authority. Such material information include, but are not limited to:

1. Financial results
2. Projections of future earning or losses
3. News of a pending or proposed merger

	INSIDER TRADING POLICY	Version No.	1.0
		Page	Page 4 of 6
RASLAG CORP.			

4. Change in the corporate structure such as re-organization
5. Acquisitions/Divestments/Joint Ventures
6. Dividend declaration and changes in dividend policy
7. New significant equity investments
8. Litigation exposures
9. Changes in senior management positions

Officers - means those performing management functions or those who are directly elected by the Board of Directors such as the Corporate Secretary, Assistant Corporate Secretary, Compliance Officer and Investor Relations Officer.

Relatives - relatives up to the second degree, by consanguinity, affinity or legal adoption, including spouse, parents, children (and their spouses), siblings (and their spouses), grandparents, and common law partners and his/her relatives of up to second degree, by consanguinity, affinity or legal adoption.

Structured Disclosures - are defined periodic reportorial requirements by the SEC and the PSE.

Trading Day – any day when the PSE is open for business.

Unstructured Disclosures - any material fact or event that occurs, not covered by the structured reports, which would reasonably be expected to affect investor's decisions in relation to the trading of its securities.


III. GENERAL RULES

A. BLACKOUT PERIOD

1. Blackout Period- the following shall be used as guide in determining the Blackout Period coverage:

Structured Disclosures- Ten (10) Trading Days before and two (2) Trading Days after the disclosure of structured reports.

Unstructured Disclosures- Two (2) Trading Days before (whenever applicable) and after the disclosure of any material information other than the structured reports.

	INSIDER TRADING POLICY	Version No.	1.0
		Page	Page 5 of 6
RASLAG CORP.			

2. An Insider shall not buy or sell, directly or indirectly, listed and publicly traded shares of the Company within the Blackout Period.
3. To avoid possible violations of this Policy, specifically on Blackout Periods, an Insider should consult the Compliance Officer prior to the trading of the Company shares.
4. The Company's Compliance Officer is tasked to announce or disseminate the Blackout Period at least one (1) week prior to the release of structured reports or one (1) Trading Day for the unstructured reports.
5. The Company Directors, Officers, Consultants and Advisers, their respective secretaries and executive assistants and other persons covered by this Policy shall be responsible for explaining this Policy and for relaying the Blackout Period announcement to their relatives for their guidance.

B. EXCEPTION HANDLING


In case an exceptional situation arises when a participant is constrained to trade the Company shares while the Blackout Period is imposed, the following rules shall be observed:

1. The concerned person shall write the Corporate Governance Committee prior to trading his/her shares explaining the exceptional situation.
2. A written resolution of the Corporate Governance Committee shall have to state the date or dates when the trading will be allowed and the reason for granting this exception.
3. The Corporate Secretary shall keep records of the decisions taken on exceptional cases.

C. REPORTORIAL REQUIREMENTS

1. The Securities Regulation Code prescribes that a Director or an Officer of the Company shall file a statement with the SEC and the PSE within two (2) Trading Days after he becomes a Beneficial Owner, Director or Officer.

Subsequently, the Beneficial Owner shall be required to file within two (2) Trading Days after the close of each calendar month thereafter, if there has been a change in such ownership during such month.

	INSIDER TRADING POLICY	Version No.	1.0
		Page	Page 6 of 6
RASLAG CORP.			

- All Directors and Officers of the Company shall submit their accomplished Statement of Changes as Beneficial Owners to the Compliance Officer not later than one (1) Trading Day after the occurrence of the event.

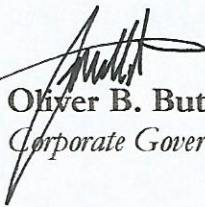
IV. CONSEQUENCES OF NON-COMPLIANCE

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

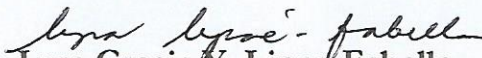
Insider trading under the law may be subject to penalty for damages or fine and/or imprisonment under the relevant provisions of the Securities Regulation Code.



Peter G. Nepomuceno
Chairman of the Board



Oliver B. Butalid
Corporate Governance Committee Chairman



Lyra Gracia Y. Lipac-Fabella
Compliance Officer