

## **PERSONAL TRADING POLICY**

### **I. Introduction**

As part of BDO Group, BDO Finance Corporation (BDOFC) adopts the Personal Trading Policy of BDO Unibank.

The policy is to provide guidance for BDO Group in upholding the highest standards of compliance with the pertinent laws and regulations. Furthermore, it underscores the BDO Group's commitment to the principles of good corporate governance, which are essential for promoting fairness, transparency, and preserving the BDO's reputation in the marketplace.

Pursuant to the Securities and Regulations Code, "it shall be unlawful for an insider to sell or buy a security of the issuer, while in possession of material information with respect to the issuer or the security that is not generally available to the public."

By adhering to this policy, the BDO Group reaffirms its dedication to ethical business practices, protecting investor interests, and sustaining the trust and confidence of all its stakeholders.

### **II. Applicability**

This policy is applicable to all directors, officers and employees of BDO Group (Covered Individuals) who, in the discharge of their duties, may gain access to material non-public information about BDO Group. This policy also applies to all employees who manage customer accounts and with access to material non-public information of BDO Group's clients.

This policy excludes acquisition/purchase of BDO Group shares granted/acquired through the Employee Stock Option Program, as well as purchase of financial instruments of BDO clients from any public offerings.

### **III. Trading Rules**

#### **A. Trading of financial instruments of BDO Group**

- i. Covered individuals shall not trade any financial instrument of BDO Group while in possession of, or with direct or indirect access to, material non-public information that could significantly effect a decision to buy or sell a security, including any other action, to take advantage of or pass on that information to others.
- ii. A trading black-out period shall be imposed to provide market with adequate time to absorb and react to the disclosed information, thereby maintaining market integrity and preventing misuse of information.

The black-out period refers to the trading days where covered individuals, regardless of whether or not they have access to, or possession of material non-public information are prohibited from trading financial instruments of BDO Group. The duration of the black-out period shall be defined, but it should not be less than the minimum number of trading days prescribed by applicable rules and regulations.

- iii. Financial instruments of BDO Group shall be subject to a prescribed holding period counted from the date of purchase.

## **B. Trading of BDO Group clients' financial instruments**

Officers and staff of units that have been identified to have access to material non-public information or sensitive client information, shall not trade on financial instruments of their managed accounts.

All other employees are permitted to trade in BDO Group clients' financial instruments, provided they do not possess material non-public information.

## **IV. Disclosure Requirements**

Covered individuals must adhere to specific procedures and guidelines for disclosing their trades and holdings in compliance with relevant laws, rules, and regulations.

## **V. Enforcement and Sanctions**

### **A. Enforcement**

- i. Violations committed by any officer and/or staff shall be reported to the Compliance Department for initial assessment.
- ii. Violations committed by any director shall be reported by the Corporate Governance Officer to the Corporate Governance Committee for assessment and/or investigation.

### **B. Sanctions**

- i. The degree of offense shall be assessed as grave, serious, or minor according to the provisions of BDO's Code of Conduct.
- ii. In addition to the sanctions imposed per the BDO's Code of Conduct, BDO Group may report an incident of insider trading to the SEC to support the filing of criminal and/or administrative charges.

## **VI. Other Provisions**

- A. This policy incorporates by reference the Securities Regulation Code and its Implementing Rules and Regulations, as well as rules of Self-Regulatory Organizations (e.g., Philippine Dealing and Exchange Corporation and Philippine Stock Exchange) which outline specific prohibitions and requirements with regard to insider trading. This policy shall be deemed modified should there be any subsequent amendments to, or any inconsistency with, applicable laws, rules, and regulations.
- B. This policy will be reviewed and updated as necessary to ensure its effectiveness and compliance with regulatory changes.