

## INSIDER TRADING POLICY

This policy is intended to implement the prohibitions on insider trading in the Securities Regulation Code and to comply with best practices of corporate governance.

### 1. Policy

Directors, officers and employees of the Company who know material and confidential information (i.e., facts in the business operations of the Company that have not been disclosed to the public) are prohibited from buying or selling (trading) share of stock of 2GO, except in accordance with this policy.

### 2. Material Information

All information that is likely to affect the market price of 2GO's shares is deemed to be material. Such material information includes, but is not limited to, financial results, mergers and acquisitions, significant investments and litigations, major changes in key senior management positions, and the like.

### 3. Trading Restriction Period

Directors, officers and employees are strictly prohibited from trading in 2GO shares five (5) trading days before and two (2) trading days after the disclosure of quarterly and annual financial results and any other material information.

This is in pursuant to Section 13.2 of the PSE Disclosure Rules –

*“13.2 A Director or Principal Officer of an Issuer must not deal in the Issuer’s securities during the period within which a material non-public information is obtained and up to two full trading days after the price sensitive information is disclosed.”*

### 4. Penalties

Any person who violates this policy shall be subject to disciplinary action, without prejudice to any civil or criminal proceedings which may be filed against him. Under the law, insider trading may be subject to penalty for damages or fine and/or imprisonment.

For any queries or clarifications pertaining to this policy, kindly email : [governance@2go.com.ph](mailto:governance@2go.com.ph).