



POLICY ON INSIDER TRADING

In line with upholding the principles of fairness and transparency by ensuring that shareholders are afforded due protection and that individuals do not benefit from knowledge which is not otherwise generally available to the market, PSBank commits to prevent Insider Trading as prohibited under Section 27 of the Securities Regulation Code (SRC) and to comply with the pertinent requirements of the Securities and Exchange Commission (SEC) and the Philippine Stock Exchange (PSE) as a Publicly-Listed Company (PLC).

As such, this policy provides for the standard of conduct applicable to directors, Board Advisers and employees of PSBank to the extent that they are considered reporting insiders having possession of Material Non-public Information involving the Bank's and its Partner's securities. This policy includes such reporting insiders' associates e.g. relatives within the second degree of consanguinity and affinity, immediate family/household members and corporations, other entities and funds subject to their influence or control whose compliance with this policy is the responsibility of the director or employee concerned.

This policy aims to prohibit any director, Board Adviser or employee of the Bank, who has Material Non-public Information, to do the following whether directly or indirectly:

- Trading - Trade either in PSBank Securities or Partner's Securities; and
- Disclosure - Communicate Material Non-public Information about the Bank's securities or any of its partner's securities, to any person whom the Bank's director or employee has reason to believe will trade on those securities ("Tipping"), unless made strictly on a need-to-know basis only and in furtherance of a legitimate business purpose.

This policy also defines the term "Material Non-public Information" as information that has not been generally disclosed to the public and, if disclosed, would likely affect the price of the securities whether positively or negatively.

Such material information can be a crucial factor in making investment decisions and includes but is not limited to:

- Financial results
- Projections of future earnings or losses
- News of pending or proposed merger
- Change in the corporate structure such as reorganization
- Acquisition/divestiture/joint venture
- Dividend declaration and changes in dividend policy
- Stock splits
- New significant equity investment or debt offering
- Significant litigation exposures
- Major changes in key senior management positions
- Public or private sale of company structure

To achieve its objectives, this policy requires reporting insiders to:

1. Report their and their associates' respective beneficial ownership of PSBank shares of stock, if any, including subsequent changes thereto pursuant to the rules and regulations of the Securities and Exchange Commission (SEC) and the Philippine Stock Exchange (PSE); and
2. Duly observe the defined "Blackout Periods" or such periods within which the buying and selling of PSBank shares of stock by reporting insiders and their associates is prohibited when a Material Non-public Information is obtained up to certain number of days after such information is disclosed and to comply as well with the required pre-clearance procedures before trading PSBank shares of stock.