

MEGAWIDE CONSTRUCTION CORPORATION TRADING POLICY

I. INTRODUCTION

It is illegal under the securities laws, rules and regulations of the Philippines, and many other jurisdictions, for directors, officers, and/or employees who have Material Non-Public Information (as defined below) about their corporation to trade (buy or sell) their shares or securities therein, or to trade through or on behalf of another person, by reason of such Material Non-Public Information. This is also known as insider trading.

The purposes of this policy are to: (i) inform all the directors, officers, and employees of Megawide Construction Corporation (the "Company") of their duties and responsibilities under applicable securities laws, rules, and regulations; (ii) set out the implementing guidelines to ensure compliance therewith; and (iii) preserve the reputation and integrity of the Company and all persons affiliated with the same.

Failure to fulfil the obligations set forth in this policy may result in administrative penalties, criminal and civil liabilities, as well as reputational damage to both the Company and the person involved. As such, extraordinary diligence and utmost good faith must be exercised in the observance of this policy.

II.

- b. No Insider who possesses any Material Non-Public Information should Trade in the Company Securities from the time he/she acquires the said information, and until two (2) trading days after such information has been disclosed to the public.

V. REPORTORIAL REQUIREMENTS OF DIRECTORS AND OFFICERS

The directors and officers of the Company are legally required to report their beneficial ownership in the Company Securities, including any changes thereof. For timely compliance with this requirement, said directors and officers must immediately inform the Office of the Compliance Officer of their beneficial ownership in the Company Securities, and any changes thereof, not later than five (5) trading days after their election or appointment, or not later than five (5) trading days after the acquisition or disposal of the Company Securities, in case of changes in beneficial ownership.

For purposes of complying with the foregoing reportorial requirements, a director's or an officer's beneficial ownership in the Company Securities shall include not only the Company Securities which he/she directly owns but also the Company Securities which are:

- a.