

SFA SEMICON PHILIPPINES CORPORATION

Insider Trading Policy

Policy Statement

Any form of illegal insider trading is against the policy of the Company on good governance. Such trading can cause significant harm to the reputation for integrity and ethical conduct of the Company.

Objective

The purpose of this policy is to promote compliance to the regulatory rules governing Publicly Listed Companies (PLC) and to promote fairness in the stock market.

Applicability

This Policy applies to all directors, officers and employees of SFA Semicon Philippines Corporation (SSP) who in the discharge of their duties, may gain access to material non-public information that may affect price of SSP shares that are traded in The Philippine Stock Exchange.

Trading Restrictions

Covered individuals shall not trade any SSP shares while in possession of, material price-sensitive information that would have significant effect in making a decision to buy, sell or hold a security including any other action to take advantage of, or pass on to others, that information.

Directors and principal officers must not deal with the Corporation's securities during the period within which a material non-public information is obtained up to two (2) full Trading days after the price sensitive information is disclosed.

Disclosure Requirements

Within three (3) trading days from booking date, directors and principal officers of the Corporation shall report to the Investor Relations Officer any acquisition and any changes, thereto, including disposal or change in their shareholdings in the Corporation's shares of stocks.

The Investor Relations Officer shall disclose to the Exchange within five (5) trading days said acquisition, disposal or change in the ownership of its directors and officers.

Disciplinary Action

Individuals who fail to comply with the requirements of this Insider Trading Policy are subject to disciplinary action, at the sole discretion of the Company, including dismissal for cause.