

INSIDER TRADING POLICY EURO-MED LABORATORIES PHIL., INC.

Under the Philippine setting, the Securities and Exchange Commission (SEC) requires all publicly listed companies to draw/design policies covering insider trading to protect the public from abusive trading practices and to maintain ethical standards in trade dealings. Certain requirements and disclosures on Insider Trading are covered by the SEC's Securities Regulation Code to ensure adherence to the principles of good Corporate Governance.

Directors, Officers and employees who have a direct or indirect knowledge, from time to time, of material facts or changes in the affairs of the Corporation, which have not been disclosed to the public, including any information likely to affect the market price of the Corporation's shares, are restricted to buy or sell Euro-Med shares during the following period:

- a) Ten (10) calendar trading days before and three (3) calendar trading days after the disclosure of quarterly and annual financial results; and
- b) Three (3) calendar trading days before and three (3) calendar trading days after the disclosure of any material information other than the above.

Material information may include, but not limited to:

- a) Financial results
- b) Projections of future earnings or losses
- c) News of pending or proposed merger
- d) Change in the corporate structure (e.g. reorganization)

- e) Acquisition / Divestiture / Joint Venture
- f) Dividend declaration and changes in dividend policy
- g) Stock splits
- h) New significant equity investment or debt offering
- i) Significant litigation exposure
- j) Major change in key senior management position

Under the SEC Regulations, information is “material non public” if: (a) it has not been generally disclosed to the public and would likely affect the market price of the security after being disseminated to the public and the lapse of a reasonable time for the market to absorb the information; or (b) would be considered by a reasonable person important under the circumstances in determining his course of action whether to buy, sell or hold a security.

In line with the Corporation’s Board Charter, Directors and Officers who may be covered by the reporting requirements of the Securities and Exchange Commission (SEC) and the Philippine Stock Exchange (PSE) in respect of their shareholding in the Corporation or any changes thereof shall do so promptly and accurately and should disclose to the Board any dealings in the Company’s shares within three (3) business days from the subject transaction.