

MONDE NISSIN CORPORATION

Insider Trading Policy

1. PURPOSE OF THE INSIDER TRADING POLICY

Monde Nissin Corporation (“MNC”) adopts this Insider Trading Policy (“Policy”) to ensure compliance by the directors, officers, employees, consultants, advisers, and contractors of MNC and of its subsidiaries and affiliates with the prohibitions against Insider Trading as provided in applicable laws and regulations, particularly the Securities Regulation Code (“SRC”), its Implementing Rules and Regulations (“IRR”), and the relevant issuances of the Securities and Exchange Commission (“SEC”), the Philippine Stock Exchange (“PSE”) and the Philippine Dealing Exchange Corporation (“PDEX”), on dealings in shares of publicly listed companies.

This Policy may be amended from time to time by MNC’s Board of Directors (“Board”). The Board’s Corporate Governance, Nomination and Remuneration Committee (“Committee”) is tasked with overseeing the implementation of this Policy.

2. PROHIBITION ON INSIDER TRADING

All directors, officers, employees, consultants, agents, advisers, and contractors of MNC, and that of MNC’s subsidiaries and affiliates (“MNC Group”), and members of the immediate families of such directors and officers who are living in the same household as the directors and officers (collectively, “Covered Persons”), who have knowledge of material information about MNC that is not disclosed or not made available to the public, shall, from the time they obtained the knowledge of such material, non-public information: (a) not trade in MNC’s securities, directly or indirectly; and (b) not communicate, convey or in any manner disclose, directly or indirectly, such material, non-public information to any person, until such material, non-public information is disseminated to the public and two (2) full Trading Days have lapsed from the disclosure of such material, non-public information to allow time for the market to absorb such information. For purposes of this Policy, a “Trading Day” is any day when the PSE is open for business and dealings in the stock market may be made by the public.

3. MATERIAL NON-PUBLIC INFORMATION

Information is considered “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; (b) it 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. Material, non-public information can be positive or negative and can relate to virtually any aspect of MNC’s or the MNC Group’s business.

4. PROHIBITION ON SHARING MATERIAL NON-PUBLIC INFORMATION

Covered Persons shall not communicate material non-public information about MNC or the MNC Group to any person. In this regard, they are reminded of their obligation to protect the information of MNC, whether confidential, privileged, proprietary, or otherwise, as set out in MNC’s Code of Conduct and in other company policies, issuances, processes, and practices.

5. BLACKOUT PERIOD

In addition to the prohibitions set forth elsewhere in this Policy, Covered Persons are prohibited from dealing in MNC's securities during the following periods (each a "**Blackout Period**"):

- (a) *Structured Disclosures of Financial Reports.* — ten (10) full Trading Days before and five (5) full Trading Days after any disclosure of MNC's financial results for any year, half-year, quarterly or any other interim period;
- (b) *Structured Disclosures of Non-financial Reports.* — two (2) full Trading Days after any disclosure of MNC's defined periodic, non-financial reports required to be disclosed to the public or submitted to the SEC, PSE, or PDEX;
- (c) *Unstructured Disclosures.* — two (2) full Trading Days after the disclosure of any unstructured, material non-public information other than financial results.

MNC's Chief Compliance Officer may declare a special Blackout Period from time to time as he/she may deem proper as guided by the spirit and intent of this Policy, and he/she shall issue memos, bulletins, or reminders to Covered Persons for certain Blackout Periods that may be established. *Provided*, that a Blackout Period under items (a), (b), and (c) of this section (*i.e.*, other than special Blackout Periods) shall apply and be in force regardless of the issuance by the Chief Compliance Officer, or receipt by Covered Persons, of any Blackout Period memo, bulletin, reminder, or any notice.

To ensure compliance with this Policy, Covered Persons shall keep abreast of all disclosures made by MNC by regularly checking MNC's PSE EDGE webpage and MNC's official website, particularly the relevant sections or pages thereof where MNC's corporate disclosures are posted, published, or disseminated.

6. INTERNAL REPORTING

All directors and officers shall be required to disclose and report to MNC's Chief Compliance Officer any dealings in MNC's shares within three (3) Trading Days from the time any transaction or dealing in MNC's shares is entered into. MNC shall disclose the trading of its shares by directors, officers (or persons performing similar functions), and controlling shareholders, including purchases of MNC of its own shares from the market, in accordance with applicable law or regulations.

7. SANCTIONS

Any violation of this Policy will result in the imposition of the corresponding disciplinary sanctions, without prejudice to any administrative, civil, or criminal liabilities applicable to individuals proven after due proceedings to have violated the provisions of the SRC and its IRR and/or any applicable law.

Adopted by the unanimous vote of the Board of Directors on March 1, 2021, and amended through the unanimous vote of the Board of Directors on December 20, 2021.