



Policy on Insider Trading and Dealings in Securities

I. Policy Statement

The Board of Directors ("Board") of **Mynt, Inc.** (the "**Company**") is committed to ensuring that the Company and its directors, Officers, and employees comply with applicable securities laws, rules, and regulations on insider trading and the handling of Material Non-Public Information ("MNPI") of the Company. Thus, the Board hereby adopts this Policy on Insider Trading and Dealings in Securities (the "Policy") to ensure compliance with the said securities laws, rules, and regulations, and to maintain investor confidence, as well as protect the integrity of the Company.

II. Purpose

The purpose of this Policy is to:

- Inform all directors, Officers, and employees of the Company of their duties and responsibilities under applicable securities laws, rules, and regulations, and to set the implementing guidelines and procedures for compliance therewith.
- Safeguard MNPI of the Company, and ensure that Covered Persons shall not gain an unfair advantage in dealing and trading of the Company's Securities while in possession of MNPI.

Unless the applicable laws require otherwise, notwithstanding anything else herein, nothing herein shall substantively limit or restrict the rights or expand the obligations or liabilities of any shareholder or the director of the Company nominated by such shareholder under the Company's Articles of Incorporation and By-Laws, or as agreed by shareholders.

III. Definition of Terms

As used in this Policy, the terms below shall have the following definitions:

1. **Covered Persons** shall refer to all incumbent directors, Officers, employees (who by reason of their positions, or as determined by senior management, give or gave them access to Material Information), consultants, and advisers of the Company and members of their immediate families who are living in the same household, who have knowledge of Material Information about the Company that is not disclosed or generally available to the public. For purposes of this Policy, "immediate family" shall refer to relatives within the second degree of affinity or consanguinity.
2. **Material Information** shall refer to information required to be disclosed under the rules of the Securities and Exchange Commission ("SEC") and the Philippine Stock Exchange, Inc. ("PSE"), and any other applicable laws, rules and regulations, and shall include, but is not be limited to, the following:
 - a. Financial results;
 - b. Projections of future earnings or losses;
 - c. Mergers/acquisitions/divestitures/joint ventures;
 - d. Dividend declarations and changes in dividend policy;
 - e. Stock splits;
 - f. Material equity investments or debt offerings (involving amounts equivalent to 10% or more of the Company's total assets);
 - g. Material litigation exposure (involving amounts equivalent to 10% or more of the Company's total assets); and

- h. Changes in directors and Officers.
- 3. **Material Non-Public Information ("MNPI")** shall refer to information that has not been disclosed to the public and would likely affect the market price of the Company's Securities after being disseminated to the public and after the lapse of a reasonable time for the market to absorb the information; or would be considered by a reasonable person as important, under the circumstances, in determining his/her/its course of action whether to buy, sell, or hold the Company's Securities.
- 4. **Officers** shall refer to the following:
 - a. President, Chief Executive Officer, Treasurer, Chief Finance Officer, Corporate Secretary, and Assistant Corporate Secretary; and
 - b. Other officers mentioned in the By-Laws and appearing in the Company's General Information Sheet.
- 5. **Securities** shall include shares of stocks, bonds, debentures, notes, evidences of indebtedness, asset-backed securities; investment contracts, certificates of interest or participation in a profit sharing agreement, certificates of deposition for a future subscription; derivatives like option and warrants; certificate of assignments, certificates of participation, trust certificates, voting trust certificates or similar instruments; and other instruments that may, in the future, be determined by the SEC.

IV. Trading Guidelines and Restrictions

- 1. All Covered Persons, from the time they obtained knowledge of MNPIs are prohibited from trading, directly or indirectly, the Company's Securities,, and from communicating, directly or indirectly, the MNPI to any person, until the same is disseminated to the public and two (2) trading days have lapsed from the disclosure thereof for the market to absorb such information.
- 2. All Covered Persons are prohibited from trading, directly or indirectly, the Company's Securities, during the following blackout periods:
 - a. For structured disclosures – five (5) trading days before and two (2) trading days after the disclosure of any structured report, such as but not limited to, quarterly and annual financial results; and
 - b. For unstructured disclosures – two (2) trading days after the disclosure of any unstructured report or Material Information outside of structured reports or disclosures, as they occur and as may be necessary to update information on the operations and business of the Company.

Office bulletins for these blackout periods shall be issued by the Chief Compliance Officer ("CCO").

- 3. The sale by Covered Persons of shares acquired from stock options and equity-based incentives is subject to the above-mentioned blackout periods. However, the exercise (i.e. acquisition of shares) of stock options and equity-based incentives may be done at any time even during such blackout periods.

4. Any director or Officer is prohibited from profiting from the purchase-and-sale or the sale-and-purchase of the Company's Securities within a period of less than six (6) months, regardless of the intent, subject to the following exceptions:
 - a. If the Company's Securities were acquired in good faith in connection with debts previously contracted or obtained; and
 - b. The transactions arise from compensation arrangements between the director or Officer and the Company, or are granted through employee stock options and equity-based incentives, previously approved by the Board or the pertinent Board Committee.

In addition to any disciplinary actions that may be imposed for violation of this trading restriction, all profits realized within that period should be disgorged in favor of or turned over to the Company.

5. All Officers who intend to or are trading the Company's Securities are required: (a) to open an account with and trade the Company's Securities only through GStocks or any broker authorized by the Company; (b) execute the necessary waivers to allow the Company to examine such trades at any time; and (c) seek approval from the CCO before trading the Company's Securities. The Company shall conduct regular compliance audits in this regard.

V. Reporting Guidelines and Obligations

1. All directors and Officers of the Company, within five (5) trading days from the date of their appointment or from the date they become an owner or a beneficial owner of the Company's Securities, must submit an Initial Statement of Beneficial Ownership (SEC Form 23-A) to the CCO and to the Corporate Affairs and Governance Team ("CAG") for submission and disclosure to the SEC and PSE within the reglementary period.
2. All directors and Officers shall report to the CCO and the CAG, for submission and disclosure to the SEC and PSE, their trades and the trades of their respective immediate family members who are living with them in the same household within three (3) business days from dealing with the Company's Securities.
3. All Officers and employees shall likewise report their trades and the trades of their immediate family members who are living in the same household to the CCO and the CAG within ten (10) calendar days from the end of each quarter when the trade in the Company's Securities was made.

VI. Compliance Guidelines and Requirements

1. Within five (5) business days after the end of each month, the CAG shall submit to the Corporate Governance Committee (the "Committee") a consolidated list of notices received from Covered Persons pursuant to this Policy, if any.
2. At the end of each year, the CCO shall, as the case may be:
 - a. Submit a report to the Board disclosing to the best of his/her knowledge (i) the names of Covered Persons who, during each fiscal year, committed violations of this Policy,

reported transactions late, or failed to make the necessary disclosures, and (ii) the number of violations or delinquent filings and transactions for each Covered Person, or

- b. Submit a Certification under oath to the Board that to the best of his/her knowledge, that there were no insider trading violations committed during the year and that all whistleblower reports received in relation to possible violations of this Policy, if any, had been duly investigated and were not found to be meritorious.
3. All directors, Officers, and employees are required to report suspected or possible violations of this Policy directly to the CCO or through various whistleblower channels of the Company.
4. When in doubt as to a possible violation of this Policy, the Covered Persons shall consult with the CAG and the CCO prior to transacting the Securities of the Company.

VII. Penalties

Violators shall be subjected to disciplinary action as may be prescribed by the Board or Management, without prejudice to any civil or criminal proceedings which the Company or regulators may file for violation of existing laws, rules, and regulations.

VIII. Effectivity and Review

This Policy was approved by the Board on 10 March 2026, and shall take effect upon the listing of the securities of the Company on the Philippine Stock Exchange.

This Policy shall be reviewed annually by the Committee to assess its effectiveness, and recommend amendments, as it may deem necessary. Any amendments to this Policy shall be approved by a majority vote of the Board.