

	POLICY	Governance and Corporate Affairs	Policy No. GOV-2018-001	
			Reference: Manual on Corporate Governance	
	CORPORATE DISCLOSURES		Effective Date as approved by BOD on 05.25.2017	Amended on 05.25.2017

1. Objective

- 1.1. To provide guidelines on corporate disclosure policy and procedures.

2. Scope / Coverage

This policy covers all Directors, Officers and Employees.

3. Policy

The Company shall establish corporate disclosure policies and procedures that are practical and in accordance with best practices and regulatory expectations.

4. Guidelines

- 4.1. Corporate disclosure policies and procedures shall be in place to ensure a comprehensive, accurate, reliable and timely report to shareholders and other stakeholders to give a fair and complete picture of the Company's financial condition, results and business operations.
- 4.2. The Company shall have a policy requiring all directors and officers to disclose/report to the Company any dealings in the Company's shares within three business days.
- 4.3. The Board shall fully disclose all relevant and material information on individual board members and key executives to evaluate their experience and qualifications, and assess any potential conflicts of interest that might affect their judgment.
- 4.4. A clear disclosure of its policies and procedure shall be in place for setting Board and executive remuneration, as well as the level and mix of the same in the Annual Corporate Governance Report.
- 4.5. Full disclosure of the Company's policies governing Related Party Transactions (RPTs) and other unusual or infrequently occurring transactions shall be required in the Manual on Corporate Governance. The material or significant RPTs reviewed and approved during the year shall be disclosed in its Annual Corporate Governance Report.
- 4.6. A full, fair, accurate and timely disclosure shall be made to the public of every material fact or event that occurs, particularly on the acquisition or disposal of significant assets, which could adversely affect the viability or the interest of its shareholders and other stakeholders. Moreover, the Board of the offeree Company shall appoint an independent party to evaluate the fairness of the transaction price on the acquisition or disposal of assets.
- 4.7. The corporate governance policies, programs and procedures shall be submitted to the regulators and posted on the Company website.
- 4.8. The Board shall therefore commit at all times to full disclosure of material information dealings. It shall cause the filing of all required information through the appropriate Exchange mechanisms for listed companies and submissions to the Commission in the interest of its stockholders and other stakeholders.

For questions and/or clarifications, please contact Liz Tan or Michelle Hernandez at extension 2111 and 8812, respectively, or email governance@bellecop.com.