



“Efficiently providing you with the most reliable source of energy”



I. POLICY STATEMENT

Consistent with the key mandates of the Board of Directors of King Energy Generation Inc. ("KEGI" or the "Company"), the Company hereby formalizes the Insider Trading Policy ("Policy").

Part of the Company's commitment is to ensure compliance with all applicable laws, rules, and regulations.

II. DEFINITION OF TERMS

1. **Beneficial owner or beneficial ownership** – means any person who, directly or indirectly, through any contract, arrangement, understanding, relationship or otherwise, has or shares voting power (which includes the power to vote or direct the voting of such security) and/or investment returns or power (which includes the power to dispose of, or direct the disposition of such security); provided, that a person shall be deemed to have an indirect beneficial ownership interest in any security which is:
 - a. Held by members of his/her immediate family sharing the same household;
 - b. Held by a partnership in which he/she is a general partner;
 - c. Held by a corporation in which he/she is a controlling shareholder; or
 - d. Subject to any contract, arrangement or understanding which gives him/her voting power or investment power with respect to such securities; provided, that the following persons or institutions shall not be deemed to be beneficial owners of securities held by them for the benefit of third parties or in customer or fiduciary accounts in the ordinary course of business, as long as such shares were acquired by such persons or institutions without the definite and/or clear intention of effecting a change or influencing the control of the Issuer:
 - i. A broker dealer;
 - ii. An investment house registered under the Investment Houses Law;
 - iii. A bank authorized to operate by the Bangko Sentral ng Pilipinas ("BSP");
 - iv. A duly-registered insurance company;
 - v. An investment company registered under the investment Company Act;
 - vi. A pension plan registered with and regulated by the Bureau of Internal Revenue, Insurance Commission or any other regulatory authority; and
 - vii. An entity whose members are the persons specified above.

PROPRIETARY NOTICE

**THIS DOCUMENT CONTAINS INFORMATION PROPRIETARY TO KING ENERGY GENERATION INC. (KEGI)
ANY DISCLOSURE OR USE IS EXPRESSLY PROHIBITED EXCEPT UPON WRITTEN PERMISSION FROM KEGI**