



Date: July 3, 2023
To: All SPAVI Directors and Officers (Managers and Up)
From: Maria Rosario L. Ybanez
Subject: **INSIDER TRADING POLICY**

As a component of SHAKEY'S PIZZA ASIA VENTURES INC.'s Corporate Governance program, the Company shall restrict the purchase and sale of PIZZA shares by Covered Persons to ensure that no person is disadvantaged by lack of access to Material Information.

A. Covered Persons

Persons Covered by this Policy shall be:

- a) All members of the Board of Directors;
- b) All Executive Officers of the Company;
- c) All Managers and Assistant Vice Presidents of the Company;
- d) Consultants and Advisers of the Company;
- e) All other Company employees who are made aware of Material Information prior to disclosure; and
- f) Members of the immediate families of persons under (a) to (e) who are living in the same household.

B. Trading Blackout

All Covered Persons are strictly prohibited from buying or selling PIZZA shares up to THREE (3) trading days after the disclosure of:

1. Any Structured Report containing Material Information

Structured Reports shall refer to the periodic reports required by the Securities and Exchange Commission and/or the Philippine Stock Exchange. These include, but are not limited to:

- a) Annual Report (17-A)
- b) Quarterly Report (17-Q)

2. Any Unstructured Report containing Material Information

Unstructured Reports shall refer to communication of corporate developments as they occur and as may be necessary. These include, but are not limited to, reports on:

- a) Change in control
- b) Mergers and acquisitions
- c) Dividend declarations
- d) Extraordinary investments
- e) Any transaction which would result to issuance of shares

An announcement shall be made when a Trading Blackout is in place and a disclosure containing Material Information was released.



All Covered Persons in possession of Material Information and are made aware of the timing of its disclosure shall also be strictly prohibited from buying or selling PIZZA shares for FIVE (5) trading days prior to the release of said disclosure.

C. Reporting Requirements

All Covered Persons are required to report their trades in the form that has been provided.

Please send a scanned copy of the signed form by email to mybanez@centurypacific.com.ph and ktan@centurypacific.com.ph within 48 hours from transaction.


D. Consequences of Non-Compliance

Violations of this policy shall be subject to disciplinary action under the Company's Code of Conduct, without prejudice to any civil or criminal proceedings which the Company or its regulators, including the Securities and Exchange Commission and/or the Philippine Stock Exchange, may file for violation of existing laws.

Insider trading under Philippine law may be subject to penalty for damages or fine and/or imprisonment.

The Company's full INSIDER TRADING POLICY is attached and shall be made effective immediately.

For your information and guidance.


MARIA ROSARIO L. YBANEZ
Corporate Secretary