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	Department/Section	Initiated By	Approved By
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I. Purpose

The Company (hereinafter likewise referred to as “CAC”) adopts this INSIDER TRADING POLICY (the “Policy”) to regulate the buying or selling of CAC securities (“trading”) by directors, officers and employees of the Company who are considered to have knowledge, from time to time, of material facts or changes in the affairs of the Company which have not been disclosed to the public, including any information likely to affect the market price of CAC’s securities.

II. General Policies and Guidelines

1. “Securities” include the Company’s shares of stock, options to purchase stocks, and other evidences of indebtedness.
2. Covered Persons:
For purposes of this Policy, an “insider” will be defined as follows:
 - a. All members of the Board of Directors;
 - b. All key officers of the Company who are or may be in possession of material non-public information about CAC because of their responsibilities. Key officers of the Company include the Chairman, President, General Manager, Vice President, Corporate Secretary, Treasurer, Compliance Officer, Senior Management, and managers wherever they be assigned or seconded to the subsidiaries;
 - c. Consultants and advisers of the Company;
 - d. All other Company employees who are made aware of undisclosed material information from time to time until such information has been publicly disclosed;
 - e. Members of the immediate families of key officers and Covered Persons who are living in the same household as the key officers and Covered Persons.
3. Material Information:
For purposes of this Policy, information is deemed to be material if there is a reasonable likelihood that it would be considered important to an investor in making a decision regarding the purchase or sale of securities. While it is not possible to define all categories of material information, there are types of information that are particularly sensitive and, as a general rule, should always be considered material in nature. Such material information includes, but not limited to:
 - a. Financial results
 - b. Projections of future earnings or losses

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- c. News of a pending or proposed merger
- d. Change in the corporate structure such as a re-organization
- e. Acquisition/Divestitures/Joint venture
- f. Dividend declaration and changes in dividend policy
- g. Stock splits
- h. New significant equity investments or debt offerings
- i. Significant litigation exposure
- j. Major changes in key senior management positions
- k. Public or private sale of company securities

Either positive or negative information may be considered material.

4. Restrictions on Trading:

a. Blackout Periods

Key Officers and Covered Persons are strictly prohibited from trading during the following periods:

Structured Disclosures:

(a) Ten (10) trading days before and three (3) trading days after the disclosure of quarterly and annual financial results;

Non-Structured Disclosures:

(b) Three (3) trading days before and three (3) trading days after the disclosure of any material information other than item (a) above;

Office bulletins for special Blackout Periods pertaining to the above will be issued by the Compliance Officer.

b. Exception

The exercise of vested stock options (i.e., acquiring shares) may be done at any time, even during Blackout Periods. However, the liquidation, (i.e., the sale of shares acquired from options) is subject to Blackout Periods.

III. Effectivity

This policy shall take effect on the date indicated above and shall supersede any and all previous practices contrary to the provisions herein. It shall remain in full force and effect until amended in writing with the approval of authorized signatories.