REPOWER
ENERGY
DEVELOPMENT
CORPORATION

INSIDER TRADING POLICY

I. Objective

Repower Energy Development Corporation (the "Company")'s Insider Trading Policy shall implement the prohibitions on insider trading provided by the Security Regulation Code and ensure compliance with best practices on Corporate Governance.

II. Definition of Terms

A. Material Information – Any public information that is significant enough to affect the value of the Company's stock, or to influence someone to buy or sell stock. Such material information includes, but is not limited to, financial results, mergers and acquisitions, significant investments and litigation, major changes in key senior management positions and dividend declarations.

B. Public Information – Information available in a Securities and Exchange Commission ("SEC") and a Philippine Stock Exchange ("PSE") filing or press release in major media communication channels.

III. Policy Provision

Information acquired by virtue of office shall be treated with utmost confidentiality. The Company's non-public information should be safeguarded and shall not be disclosed to third parties. Directors, officers and employees are prohibited from buying or selling (trading) shares of stock of the Company using material non-public information and obtained by reason of position, contact within or other relationship with the Company. They are also prohibited from passing on such information to third parties for the purpose of buying or selling the Company's shares of stock.

IV. Covered Persons

The following are considered as Insiders and shall be covered by the provisions of this Policy:

A. The Company's directors, officers, employees, consultants and advisers;

B. Any person who may have been made aware of any material non-public information, with respect to the Company and its operations, either thru his work or other relationship with the Company or its directors, officers, employees, consultants and advisers;

C. Spouse or relatives by affinity or consanguinity within the second degree, legitimate or common law of those mentioned above.

V. Trading Restriction

A. Trading Restriction Period

Directors, officers, employees and the other covered persons mentioned above are prohibited from trading the Company's shares within five (5) trading days before and two (2) trading days after the disclosure of quarterly and annual financial results and any other material information.

B. Penalty

Any person who violates this Policy shall be subject to disciplinary action, without prejudice to any civil or criminal proceedings which may be filed against him.

VI. Reportorial Requirements

Director, officers and employees are required to report their trading of the Company's shares within three (3) business days after the transaction to the Compliance Officer via email stating the number of shares purchased or sold, price per share and the resulting percentage of shares owned to the Company's outstanding capital stock.

The Company, through the Compliance Officer or any authorized personnel, shall file the appropriate disclosure form to SEC and PSE for Employees and Other Covered Persons who:

A. acquired more than five percent (5%) of the Company's outstanding capital stock within five (5) business days after acquisition; or

B. acquired ten percent (10%) of the Company's outstanding capital shares within ten (10) calendar days after acquisition.