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1. Introduction

The Lanka Hospitals Corporation PLC ("the Company") endeavours to ensure accuracy, transparency, fairness and continuity in disclosing Corporate Information to all Stakeholders on a timely basis. The purpose of this Corporate Disclosure Policy ("Policy") is to establish guidelines for the timely, accurate, consistent, transparent and fair disclosure of all Material Corporate Information about the Company to all Stakeholders. This Policy aims to ensure compliance with the disclosure requirements under the Securities and Exchange Commission, the Colombo Stock Exchange and other applicable laws, regulations of the country and internal standards, as well as to maintain the confidence of all Stakeholders including shareholders, investors and analysts in the Company's integrity.

In addition, as necessary and upon deliberation by the Company's Executive Committee, the Company endeavours to disclose other Non-Material Information that it reasonably believes to be effective in ensuring a better understanding of the Company and its operations.

2. Objectives

The objectives of this Policy are as follows;

- To ensure that the Corporate Information relating to the Company is disclosed in a timely and equitable manner in accordance with the process laid down.
- To protect the confidentiality of non-public information.
- To protect personal data subject to personal data protection laws and regulations of the country.
- To maintain investor confidence and uphold the integrity of the capital markets.
- To comply with the Colombo Stock Exchange Listing Rules and other regulatory requirements.

3. Scope

This Policy applies to all directors, officers, employees, and authorized representatives of the Company, including those acting on its behalf. It covers all methods of disclosure with external and internal parties.

4. Definitions

"Company" refers to The Lanka Hospitals Corporation PLC and its fully-owned subsidiary.

"Corporate Information" refers to both Material Corporate Information and Non-Material Corporate Information.

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“Material Corporate Information” refers to the information that is required to be disclosed under the Companies Act No. 07 of 2007, the National Audit Act No. 19 of 2018, the Securities and Exchange Commission Act No. 36 of 1987 (as amended by Act No. 1991 and by Act No. 18 of 2003), Sri Lanka Accounting Standards complied under the Sri Lanka Accounting and Auditing Standards Act No. 15 of 1995 by the Institute of Chartered Accountants of Sri Lanka, and all other applicable laws and regulations and the Listing Rules of the Colombo Stock Exchange.

Material Corporate Information shall mandatorily include any information that could reasonably be expected to have a significant impact on the market price or value of the listed securities or influence an investor's decision to buy, hold, or sell those securities (Eg; financial performance, corporate actions such as dividends, buybacks, mergers, acquisitions, takeovers, joint ventures or major investments, changes in capital structure, changes in the Chief Executive Officer and the Board, regulatory changes, corporate restructuring, external factors such as natural disasters, strikes, or other major disruptions to operations, significant contract and agreements, auditor changes, and related party transactions).

“Non-Material Corporate Information” refers to the information that is not required or not mandated to be disclosed under applicable laws, rules and regulations of the country but which is reasonably believed by the Company to be useful with respect to deepening all Stakeholders’ understanding of the Company and its business activities, however, subjected to the confidentiality obligations and personal data protection laws of the country.

“Stakeholders” refers to any individuals, groups, or entities that have an interest in or are affected by the activities, decisions, and outcomes of the Company. They can be internal or external to the Company.

5. Principles of Disclosure

The Company is committed to the following principles of disclosure:

- Timeliness:** The Corporate Information will be disclosed promptly and without delay following the occurrence that warrants disclosure. When there is a statutory timeline for disclosure of Material Corporate Information, the Company commits to adhere to and comply with the said timelines.
- Accuracy:** The Corporate Information provided will be accurate, complete, and not misleading.
- Fairness:** Disclosure will be made to all stakeholders equally, ensuring no selective or preferential disclosure.
- Consistency:** Information will be communicated in a consistent manner across all channels.

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- e) **Transparency:** Information will be communicated with facts (as much as reasonably possible) regardless of the content
- f) **Compliance:** All Material Corporate Information will be disclosed in compliance with the applicable laws, regulations and rules in the country.

6. Selective Disclosures

Selective disclosure is the disclosure of material, nonpublic information to any individual or group prior to the public dissemination of that information. Selective disclosure is against this Policy unless the people or groups to whom nonpublic information is disclosed are covered by confidentiality or nondisclosure agreements.

7. Procedure and Framework of Disclosure

7.1 Identification

The respective employees who handle or contribute to generating Corporate Information or identify the need for disclosure must report it immediately to their supervisor or Head of the Department/Cluster Manager or the respective Executive Committee Member and the guidance on regulatory compliance is to be obtained from the Legal Department as and where necessary.

7.2 Review

- a) The Material Corporate Information will be reviewed by the respective Head of the Department and the relevant Executive Committee member for compliance with relevant laws and regulations and to assess the materiality. Provided if the Material Corporate Information is related to matters pertaining Board, Board sub Committees or Chief Executive Officer or the equivalent thereof or matters solely require the review of the Board of Directors, such information shall be identified and submitted by the Company Secretary to the Board of Directors or the Chairman for their review and approval.
- b) All Non-Material Corporate Information will be reviewed by the Executive Committee Members at their meeting to determine whether subjected information is necessary/ useful/ suitable or not under any confidentiality obligation or prohibition by law or any other regulation.
- c) The Corporate Information before submitting to the Audit Committee or Board of Directors or Chairman for the recommendation for external dissemination should be reviewed and approved by the Information Disclosure Compliance Officer as per the terms hereof.

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7.3 Recommendation and Approval

All Corporate Information will be submitted to the Audit Committee or Board of Directors or Chairman (as applicable) for their recommendation and approval for disclosure.

7.4 Dissemination

Corporate Information (as approved) will be disseminated by the Authorized Personnel (defined below) under the Methods/Modes of Disclosure stated herein.

7.5 Methods/Modes of Disclosure

The methods/modes of the disclosure include but not be limited to, the Company website and Company social media platforms, Company approved other forms of publications (press releases, advertisements, interviews, etc.), financial statements, annual reports, regulatory filing (Colombo Stock Exchange, Registrar of Company, Board of Investment or equivalent body, Monetary Board, etc.), investor presentations and other industry accepted public disclosures modes and internal communication mediums (Notice Boards, Emails, etc.,)

7.6 Authority for Information Disclosure/Authorized Personnel

The authority to disclose all approved Corporate Information lies with the Chairman and Group Chief Executive Officer. In the event of their absences, the following personnel shall also be authorized to disseminate approved Corporate Information in the respective areas:

- a) Group Chief Financial Officer- Corporate Information related to finance, disclosures under the annual report and investor communications;
- b) Director Medical Services- Corporate Information related to medical administration
- c) Company Secretary – Regulatory and statutory filings and disclosure and disclosures under the annual report and shareholder communications
- d) Heads of Communication and Marketing- Corporate Information related to the marketing, promotions and general notices to the public about the Company including updating the Company website and social media publications
- e) Group Chief Human Resources Officer- Internal communication of the required Corporate Information
- f) Any other person specifically authorized by the Group Chief Executive Officer for the specific disclosure requirement.

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Any delegation of powers and authority stated above by any of the Authorised Personnel shall be subject to prior approval of the Group Chief Executive Officer.

No other employee or representative is authorized to communicate Corporate Information on or about the Company to external or internal parties unless specifically designated. However, this does not preclude day-to-day communications related and required to carry out operations of the Company with the third parties.

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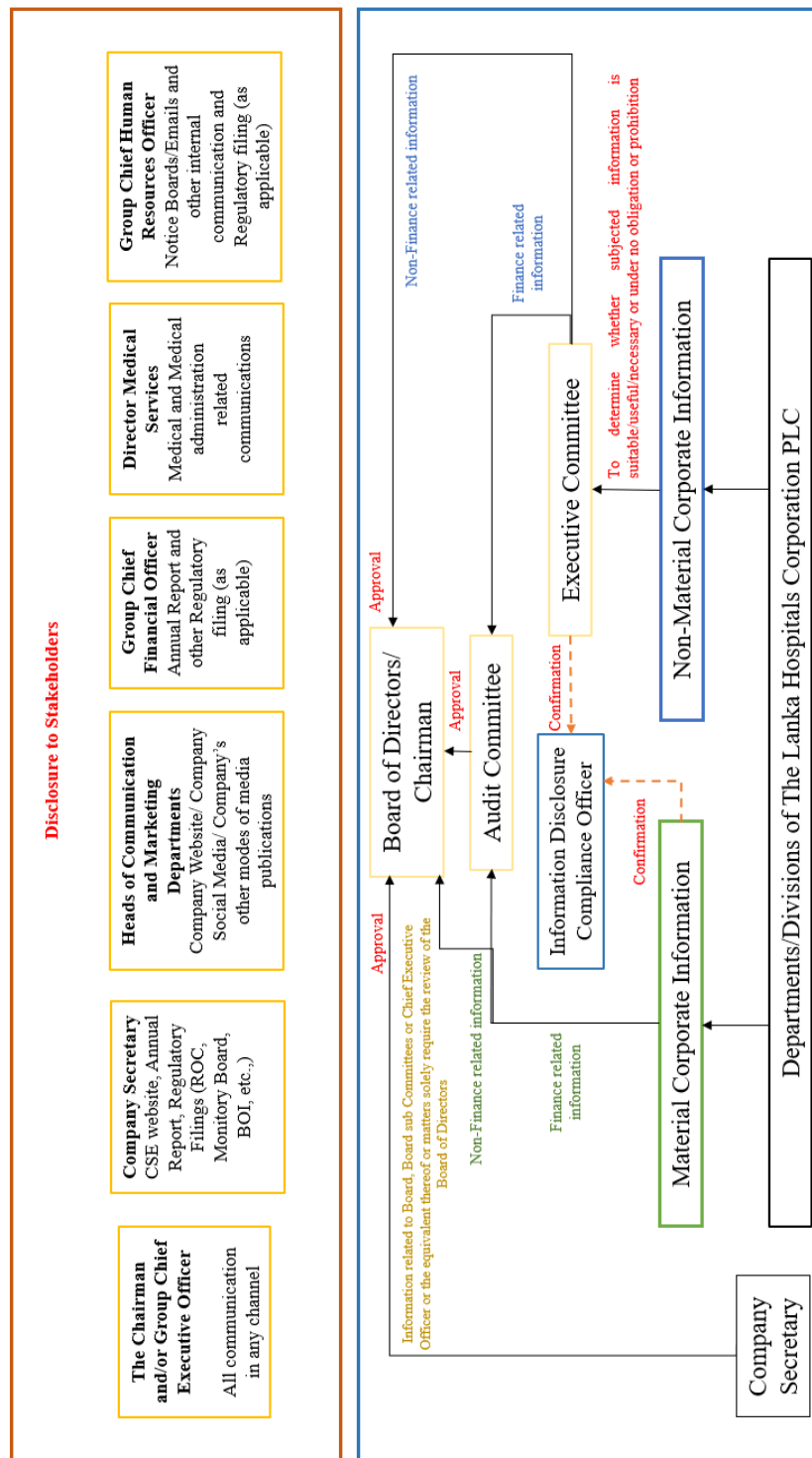


Figure 1: Framework of Corporate Information Disclosure

Source: Internal Data

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8. Responsibility

8.1 All Employees:

- a) All employees must understand and comply with this Policy, ensuring that Corporate Information is disclosed in accordance with established procedures and regulatory requirements.
- b) All employees must maintain the confidentiality of Corporate Information and ensure that it is not disclosed to unauthorized individuals or external parties until it has been publicly disclosed.
- c) All employees must use secure methods for handling and transmitting Corporate Information, including encryption for electronic communications and secure storage for physical documents
- d) All employees must report any potential material information or suspicions of insider trading or leakage of confidential information to their supervisor, or Group Chief Executive Officer or Head of Internal Audit promptly.
- e) All employees are required to participate in regular training sessions, disclosure requirements, insider trading and the Company's policies to stay informed about their responsibilities.
- f) All employees must avoid situations that may create conflicts of interest and must disclose any potential conflicts as stated in the Code of Conduct and Ethics. All employees must act ethically and in the best interests of the company, ensuring that all actions and communications related to Corporate Information are conducted with integrity and transparency.
- g) All employees must cooperate with internal audits, investigations, and reviews related to the management and disclosure of Corporate Information.

All employees above executive grade will be required to enter into a Non-Disclosure Agreement with the Company.

8.2 Information Disclosure Compliance Officer

The Information Disclosure Compliance Officer is responsible for ensuring that all disclosures of Corporate Information are made in accordance with applicable laws and regulations of the country. He /She shall review all Corporate Information intended for external release, upon submission, to ensure accuracy, completeness, and compliance with legal and regulatory requirements, prior to such information being produced to the Audit Committee. However, routinely or periodically disseminated Material Corporate Information that is

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shared externally by the Company (Eg; financial statements, and statutory/compliance filings,) or internal communications will be reviewed only if there is a change in the applicable laws, regulations, or internal policies that may impact its compliance.

For the time being this role is to be assigned to the Senior Manager-Legal and Compliance.

8.3 Group Head of Internal Audit:

The Group Head of Internal Audit is responsible for monitoring the use and effectiveness of this Policy. The Group Head of Internal Audit shall investigate any instances of non-compliance to this Policy. The Group Head of Internal Audit shall also evaluate the adequacy of internal controls related to disclosure measures and protection of non-public information, ensuring they are robust and capable of detecting and preventing unauthorized disclosures and shall recommend enhancements to controls as needed to the management.

8.4 Executive Committee:

The Executive Committee shall be responsible for reviewing all Non-Material Corporate Information to determine whether subjected information is necessary/ useful/ suitable or not under any confidentiality obligation or prohibition by law or any other regulation. The committee will escalate its recommendations with regard to finance related information to the Audit Committee and non-finance-related information to the Board of Directors or the Chairman.

8.5 Audit Committee:

The Audit Committee is responsible for overseeing the development, implementation, and periodic review of this Policy to ensure it meets legal and regulatory requirements, aligns with industry best practices, and effectively corporate disclosures are made. The Audit Committee shall be responsible for reviewing and recommending the disclosure of finance related Material Corporate Information for approval of the Board.

8.6 Board of Directors/Chairman:

The Board of Directors has overall responsibility for ensuring this Policy complies with the Company's legal and ethical obligations, and that all those under its control comply with it and finally to approve the Corporate Information for disclosure in the relevant channels by the authorized personnel hereunder.

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8.7 Company Secretary:

The Company Secretary shall be responsible to submit Board of Directors/Chairman any Material Corporate Information which is related to matters pertaining Board, Board sub Committees or Chief Executive Officer or the equivalent thereof or matters solely requiring the review of the Board of Directors or Chairman for their review and approval.

8.8 Authorized Personnel for Disclosure:

All Authorised Personnel for disclosure hereunder shall be responsible to

- a) Ensure that all Corporate Information disclosed is accurate, complete, and free from misleading statements and disclosed in a timely manner, adhering to regulatory deadlines.
- b) Review and approve all material disclosures before they are made public. Ensure that the content aligns with the company's disclosure policies and regulatory requirements.
- c) Not to allow any unauthorised personnel not make or facilitate public disclosures.
- d) Maintain comprehensive records of all disclosures, including the content of the disclosure, the date and time of release, and the individuals involved in the process.
- e) Report any instances of unintentional disclosure to the Head of Internal Audit or Group Chief Executive Officer and take steps to prevent future occurrences.

Authorized personnel are accountable for their actions and decisions related to material disclosures. Any lapses or non-compliance will be subject to review and potential disciplinary action.

9. Responding to Market Rumors and Speculation

With regard to media coverage or the spread of market rumors based on speculation about the Company, in principle, the Company does not make any disclosures or comments in response to related inquiries unless required by law. However, if the management determines that the speculation concerned could significantly affect the market value of the Company shares, the management takes appropriate actions, such as timely disclosure of related information on the subject matter.

10. Monitoring and Compliance

10.1 Monitoring:

- a) The Company conducts regular audits of disclosure practices through the Internal Audit Department to ensure compliance with this Policy.
- b) Any statutory disclosure requirement violations or non-compliances will be reported by the Legal and Compliance Department on a quarterly basis to the Audit Committee.

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- c) The Company provides ongoing training to employees on disclosure practices and regulatory requirements through its HR Division to minimize the risk of inadvertent violations.

10.2 Handling Unintentional Disclosures:

If Corporate Information is unintentionally disclosed, the Company will issue a public statement if necessary to address any confusion or misinformation resulting from the unintentional disclosure. However, the Company shall act immediately to correct the record maintained in any regulatory authority and ensure that the information is transparently made available to all Stakeholders.

10.3 Management of Insider Information:

Insider information is material information that is not yet publicly available and, if disclosed, could impact the market price or value of the Company's securities. All employees, officers, directors, and other insiders are prohibited from trading in the Company's securities based on material non-public information, in order to prevent insider trading.

11. Non-Compliance

11.1 Consequences:

Non-compliance with this Policy may result in disciplinary action, including termination of employment, and could lead to regulatory penalties and reputational damage for the Company.

11.2 Reporting Violations:

The Company has provided a mechanism for Stakeholders to report any suspected violations of this Policy confidentially under its whistleblower mechanism/channel.

12. Monitoring and Review:

The Company will regularly monitor and review this Policy annually or as needed to ensure it remains up-to-date with regulatory changes and best practices. Internal control systems and procedures will also be subjected to regular audits to provide assurance that they are effective. The Group Head of Internal Audit is responsible for conducting periodic reviews at least once every two (02) years and making recommendations for updates or improvements as necessary.

The Company reserves the right to vary and/or amend the terms of this Policy from time to time. All stakeholders shall be informed of any revisions made to this Policy.

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13. Related Policies and Procedures:

This Policy should be read in conjunction with the other policies, standard operating procedures and guidelines of the Company, namely employee misconduct, code of business conduct and ethics, bookkeeping and accounting, risk management and internal control, whistleblower policy, information security and the MOFA, employment handbook, procurement manual and IT security management guidelines.

This policy was reviewed and recommended by the Audit Committee on 10th September 2024 and approved by the Board of Directors on 19th September 2024.

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