

Policy on Internal Code of Business Conduct and Ethics for all Directors and Employees, including policies on trading in the Entity's listed securities for Ceylon Hospitals PLC

1. Purpose

The purpose of this Internal Code of Business Conduct and Ethics ("Code") is to establish the standards of behavior expected of directors and employees of Ceylon Hospitals PLC. This Code is designed to promote integrity, transparency and ethical conduct in all aspects of our business activities.

2. Compliance with Laws and Regulations

Directors and employees must comply with all applicable laws, regulations, and policies relevant to Ceylon Hospitals PLC's operations.

3. Ethical Conduct

Directors and employees of Ceylon Hospitals PLC are expected to conduct themselves ethically, with honesty, integrity and fairness in all business interactions.

4. Conflicts of Interest

Full disclosure of any actual or potential conflicts of interest is required. Directors and employees must avoid situations that may compromise their objectivity in decision-making.

5. Protection of Company Assets

Directors and employees are responsible for protecting Ceylon Hospitals PLC's assets, including intellectual property, proprietary information and physical resources.

6. Confidentiality

Directors and employees must maintain the confidentiality of non-public information, both during and after their association with the organisation.

7. Fair Competition

Directors and employees must promote fair competition and comply with antitrust and competition laws. Unfair business practices, such as price fixing or collusion are strictly prohibited.

8. Anti-Bribery and Anti-Corruption

Directors and employees shall not offer, give, receive, or solicit bribes or participate in corrupt practices. Ceylon Hospitals PLC is committed to compliance with all anti-bribery and anti-corruption laws.

9. Accuracy of Records and Financial Reporting

Directors and employees must ensure the accuracy and completeness of all records, financial reports and other public communications. Deliberate misinformation is strictly prohibited.

10. Health and Safety

Directors and employees are responsible for maintaining a safe and healthy work environment. Any concerns about safety hazards must be reported promptly.

11. Respectful Workplace

Ceylon Hospitals PLC promotes a diverse and inclusive workplace. Directors and employees are expected to treat each other with respect, free from discrimination, harassment or retaliation.

12. Trading in Listed Securities

Insider Trading:

Directors and employees who have access to non-public information about Ceylon Hospitals PLC's financial condition, performance, or other material developments are prohibited from trading in Ceylon Hospitals PLC's securities until such information is publicly disclosed.

Blackout Periods:

Ceylon Hospitals PLC will adhere to the blackout periods stipulated by Securities Exchange Commission (SEC) during which directors and employees are prohibited from trading in Ceylon Hospitals PLC's securities to prevent the appearance of impropriety or the risk of inadvertent insider trading.

13. Reporting Violations

Directors and employees are encouraged to report any known or suspected violations of this Code promptly. Ceylon Hospitals PLC will not tolerate retaliation against individuals who make good-faith reports.

14. Disciplinary Actions

Violations of this Code may result in disciplinary action, up to and including termination of employment or removal from the Board of Directors.

15. Training and Communication

Ceylon Hospitals PLC will provide periodic training on this Code to ensure awareness and understanding among directors and employees. Changes to the Code will be communicated promptly.

16. Review and Updates

This Code will be reviewed periodically and updated as needed to reflect changes in laws, regulations, or Ceylon Hospitals PLC's organisation-wide practices.