

# **Policy on Stakeholder Communication & Corporate Disclosures**

LOLC HOLDINGS PLC

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# Policy on Stakeholder Communication & Corporate Disclosures

## 1. Purpose

The stakeholders of the Company are its Regulators, Shareholders, Customers (including Depositors), Employees, Suppliers of professional services such as lawyers, auditors, Suppliers of goods and services, Creditors and the Community.

The purpose of this Stakeholder Communication & Corporate Disclosure Policy (the "**Policy**") of LOLC Holdings PLC (the "**Company**") is to ensure that:

- (a) the Company complies with its timely reporting/ disclosure obligations as required under applicable Rules & Regulations of the Central Bank of Sri Lanka and the Listing Rules of the Colombo Stock Exchange as well as the Companies Act, labour laws and any other law or regulation that the Company needs to comply with;
- (b) all persons to whom this Policy applies would meet their obligations to preserve the confidentiality of Undisclosed Material Information; and
- (c) all parties who have Undisclosed Material Information are prohibited from trading in securities of the Company on such Undisclosed Material Information and disclosing/tipping such information to third parties under this Policy.
- (d) the Company prevents the selective disclosure of material changes to analysts, institutional investors, market professionals and others;
- (e) documents released by the Company or public oral statements made by a person with authority to speak on behalf of the Company that relates to the business and affairs of the Company do not contain a misrepresentation;

This Policy applies to personnel of the Company including directors and officers, as well as consultants and advisors engaged by the Company. All persons to whom this Policy applies shall exercise their powers / discharge their duties / act honestly and in good faith in the best interests of the Company.

## 2. Revision History and the Purpose of Amendment

Originally adopted on 24<sup>th</sup> November 2010; reviewed and revised in May 2024 to maintain its relevance in relation to applicable rules of the Colombo Stock Exchange.

### **3. Communication with Regulators**

The Company will make related submissions / disclosures to the Colombo Stock Exchange; and will comply with requirements with regard to time, content and format.

The Company will ensure that the regulators are provided access to all relevant records requested if the regulator conducts an on-site inspection.

### **4. Communication with Shareholders**

#### **4.1 Interim Financial Statements and Annual Report**

Subject to the recommendation of the Audit Committee and approval by the Board:

In accordance with the Continuing Listing Regulations of the Colombo Stock Exchange (CSE), interim financial statements will be released every quarter to the CSE and to the shareholders in the manner prescribed by the CSE.

Within the prescribed period after the end of the financial year, the Company will release to the CSE and all shareholders the Annual Report. This Report will contain all disclosures required by statute, and will also contain comprehensive reports, detailing the activities, the progress and the position of the Company and the Group as applicable. The audited financial statements of the Company, together with the independent auditor's report will also be included. All these will cover the financial year under review and post balance sheet events.

#### **4.2 Announcements through the CSE**

In accordance with the applicable Rules and Regulations, the Company will make disclosures of material information /significant board decisions.

Upon evaluating the necessity of making the disclosure, which require release in terms of applicable rules and regulations, the contents will be reviewed by personnel in all applicable internal departments of the Company (i.e. Finance, Company Secretariat, Marcom) and where applicable, by external advisors (i.e. legal counsel) when necessary.

### **5. Communication with Customers**

#### **5.1 Language of choice**

Customer communication will be available in English, Sinhala and Tamil, to enable a customer to select the language of his /her choice.

#### **5.2 Supply of information**

A customer will be supplied with all details of his transaction with the Company, including the terms and conditions, payments due, relevant dates, applicable penalties and also the officers to be contacted for further assistance. Any changes to these which might arise during the life time of the said transaction will be notified to the customer.

### **5.3 Additional products and services**

Customers will be informed of additional products and services available to enable them to avail themselves of these facilities.

## **6. Communication with Employees**

Communication with employees will be through meetings, through emails, through memos and through the intra- company portal (electronic notice board).

These communications will include policies and procedures approved by the Board; announcements /notices relating to staff; information regarding training etc.

## **7. Communication with Suppliers of Professional Services**

### **7.1 Access to records / officers**

The Management will facilitate the Company's External Auditors reviewing the records and documents which they need to examine in order to present their findings to the Board and their report to the shareholders.

The Management will provide the Company's Lawyers and Tax consultants with the information required for them to provide an opinion and / or offer advice.

### **7.2 Participation at meetings**

The Company's External Auditors, Lawyers and Tax Consultants will be invited to attend the Annual General Meeting of the Company. They will also be invited to related sub committee meetings (such as Audit Committee meetings) as and when relevant or necessary.

## **8. Communication with Suppliers of Goods and Services**

Communication with suppliers of goods and services will include the Company's expectations; reasons for termination (in such an event).

## **9. Communication with Creditors**

Communication with creditors will state clearly the terms and conditions of payment including dates.

With regard to banks and other financiers, communication will include disclosures of relevant financials and, wherever necessary, in the required format.

## **10. Communication with the Community**

### **10.1 Press Releases**

The Company may periodically issue press releases, which would highlight its an achievement or significant mile stone of the Company to enhance disclosure and transparency.

Press releases/public statements will be made only by spokespersons authorized to make public/oral statements on behalf of the Company; and the spokespersons will ensure that any statements made on behalf of the Company would not contain any misrepresentation.

### **10.2 Company Website**

The Web site will provide information of the Company and the Group. This will include details of the Board, countries and sectors of business, policies implemented in conformity with relevant rules of the CSE and contact details.

The Chief Officer Marketing Communications of the Company is responsible for creating and maintaining the Company's website and will be maintained in accordance with this Policy.

The GMD/CEO will review or designate appropriate management personnel to review the disclosures on the Company's website periodically to ensure that it remains accurate and consistent with this Policy.

### **10.3 Social media**

The Company's social media channels will provide information of the Company. This will include detailed activities carried out by the company, latest company news & events, client success stories, vacancies, etc. and engagement with stakeholders in conformity with relevant rules of the CSE.

The Chief Officer Marketing Communications of the Company is responsible for creating and maintaining the Company's social media and will be maintained in accordance with this Policy.

The MD/CEO will review or designate appropriate management personnel to review the material and social interaction on the Company's social media periodically to ensure that it remains accurate and consistent with this Policy.

### **10.4 Internet Chat Rooms and Bulletin Boards**

Directors, Officers, Employees and Contractors will not discuss or post any information relating to the Company or any of its subsidiaries or trading in securities of the Company in Internet chat rooms, newsgroups or bulletin boards, unless authorised by the Company.

Directors, Officers, Employees and Contractors will advise the GMD/CEO or Chief Financial Officer if they are aware of any discussion of information regarding the Company in a chat room, newsgroup or bulletin board.

## **10.5 Rumours**

The Company will not comment, affirmatively or negatively, on rumours. This also applies to rumours on the Internet.

Ordinarily, the Company will not respond to such reports or rumours, unless they appear to contain material information, or may be expected to affect the price of the Company's securities or trading activity in those securities.

When a report or rumour about the Company contains material errors, the Company will issue an announcement to the Exchange to deny or clarify the report or rumour, and provide sufficient supporting information. In general, the Company will take a proactive approach to the addressing of reports and rumours, so as to minimise uninformed speculation and promote an orderly market in its securities.

## **11. Group Companies**

Where relevant and applicable, any subsidiary or associate companies which are linked with the specific communication will be indicated, and if necessary or relevant, their relationship with the Company.

## **12. Brand Image**

Any and all communication will be such that the standard and level of the Company's brand and image are maintained.

## **13. Confidentiality of Undisclosed Material Information**

Any person to whom this Policy applies and who has knowledge of Undisclosed Material Information must treat the Material Information as confidential until the Material Information has been generally disclosed.

Undisclosed Material Information will not be disclosed to anyone except in the necessary course of business. If Undisclosed Material Information has been disclosed in the necessary course of business, anyone so informed must clearly understand that it is to be kept confidential, and, in appropriate circumstances, execute a confidentiality agreement.

No person/entity connected / related to the Company will purchase or sell securities of the Company while in possession of Undisclosed Material Information.

## **14. Trading of Securities of the Company**

To ensure fair disclosure of financial information, the Company stipulates a quiet period that runs from the day after the closing of each quarter until the results for the quarter are announced. However, material information subject to disclosure rules will be disclosed, even during quiet periods.

Furthermore, directors, officers, employees are prohibited from trading securities of the Company for the period of time beginning 7 market days prior to the disclosure of financial

results for a fiscal quarter or fiscal year and ending 2 market days after such disclosure (**Blackout Period**).

Notwithstanding the above, a director, officer, or employee may purchase or sell securities during a blackout period with the prior written consent of the Chief Financial Officer only in the case of unusual, exceptional circumstances i.e. financial need or where the timing of the sale is critical for significant tax planning purposes.