

LANKA ALUMINIUM INDUSTRIES PLC

POLICY ON INTERNAL CODE OF BUSINESS CONDUCT AND ETHICS

1. OVERVIEW

The Board of Directors of Lanka Aluminium Industries PLC (“Lanka Aluminium”) has adopted this Policy on Internal Code of Business Conduct and Ethics (the “Policy”) to set forth standards for ethical conduct and principles that Directors and employees are expected to uphold. This Policy ensures that all employees and Directors act with the highest levels of integrity, professionalism, and accountability in their roles.

2. PURPOSE

The purpose of this Policy is to provide guidance to Directors and employees to perform their duties with ethical integrity, adhere to legal and regulatory standards, and safeguard the reputation of Lanka Aluminium.

3. SCOPE

This Policy applies to Lanka Aluminium Industries PLC and includes all Directors, Key Management Personnel, and employees.

4. GENERAL DUTIES AND RESPONSIBILITIES

4.1 Directors should act in the best interest of the Company and its shareholders, fulfilling fiduciary obligations with diligence, honesty, and integrity.

4.2 Employees are required to act in good faith, uphold company interests, adhere to all relevant laws and internal policies, and refrain from engaging in activities conflicting with Lanka Aluminium’s business interests.

4.3 Compliance with employment terms and policies is mandatory, with all resources used solely for business purposes and managed responsibly.



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5. CONFLICTS OF INTEREST

5.1 Disclosure of any personal interest that could conflict with the company's interests is essential. Directors should promptly report potential conflicts to the Board, while employees must inform their supervisors and recuse themselves from related discussions or decisions.

5.2 Prohibition of Personal Gains – Employees and Directors must avoid situations where personal benefits may arise due to their roles.

6. ANTI-BRIBERY AND CORRUPTION

Lanka Aluminium strictly prohibits all forms of bribery, facilitation payments, and kickbacks. Directors and employees are expected to comply fully with anti-corruption laws and company policies and must refrain from actions that could be perceived as attempts to influence business or personal advantages.

7. CONFIDENTIALITY

7.1 Protection of Information – All proprietary information, trade secrets, and personal data related to the company or its clients must remain confidential. This obligation extends beyond employment or directorship tenure.

7.2 Authorized Disclosure – Confidential information may only be disclosed when legally required or explicitly authorized by the company.

8. TRADING IN COMPANY SHARES

Directors and employees with access to non-public, price-sensitive information are prohibited from trading Lanka Aluminium securities. All transactions must comply with the Securities and Exchange Commission regulations.

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9. ENCOURAGING ETHICAL REPORTING

Employees and Directors should report any breaches of this Policy through established whistleblowing channels. Lanka Aluminium protects individuals who report in good faith from retaliation, consistent with the company's Whistleblower Policy.

10. GIFTS AND HOSPITALITY

Directors and employees should exercise caution in offering or accepting gifts or hospitality to avoid any appearance of impropriety. Gifts should be of nominal value and must not be intended to influence business decisions.

11. INSIDER TRADING

Directors and employees are prohibited from trading Lanka Aluminium securities based on material non-public information and must not disclose such information to others.

12. COMPLIANCE WITH LAWS, RULES, AND REGULATIONS

All Directors and employees must comply with applicable laws, rules, and regulations, including anti-money laundering and data privacy laws.

13. FAIR DEALING

Lanka Aluminium expects all employees and Directors to deal fairly with customers, suppliers, and competitors. Manipulation, abuse of information, or any unfair practices are strictly prohibited.

14. CORPORATE OPPORTUNITIES

Directors and employees should not use company resources or information for personal gain or compete with Lanka Aluminium for business opportunities.

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15. PROTECTION OF ASSETS

Lanka Aluminium's assets, including proprietary information, should be used exclusively for legitimate business purposes. Directors and employees are personally responsible for safeguarding these resources from misuse.

16. REVIEW OF THE POLICY

This Policy will be reviewed periodically to ensure alignment with evolving regulatory and legal standards. Any amendments must be approved by the Board of Directors.

Effective Date:

This policy is effective from 1st October 2024.