

POLICY ON CORPORATE DISCLOSURES – MILLENNIUM HOUSING DEVELOPERS PLC

1. Purpose

The purpose of the Policy is to establish a clear framework for the timely, accurate, and transparent disclosure of information to stakeholders, while ensuring compliance with all applicable laws, regulations, and corporate governance best practices.

Information shall be considered material if its omission, misstatement, or concealment could reasonably be expected to influence the decisions of investors or other stakeholders.

Material information includes, but is not limited to:

- Financial results and forecasts
- Changes in senior management
- Legal proceedings and regulatory actions

All material information must be disclosed in compliance with:

- Companies Act No. 7 of 2007
- Colombo Stock Exchange (CSE) Listing Rules
- Securities and Exchange Commission (SEC) regulations

2. Scope

The Policy applies to:

- The Board of Directors, management, and all employees of the Company
- All forms of corporate communication, including financial and non-financial disclosures
- Disclosures made to shareholders, regulators, investors, creditors, and the public

3. Objectives

The objective of the Policy is to promote transparency, accountability, and integrity in meeting stakeholder information requirements and to ensure compliance with all applicable legal and regulatory obligations.

Disclosures shall be made through:

- The Colombo Stock Exchange (CSE)
- The Company's official website
- Other relevant public communication platforms, as appropriate

4. Principles of Disclosure

The Company shall adhere to the following principles:

- **Accuracy and Completeness**

All disclosures must be factual, accurate, and not misleading.

- **Timeliness**

Material information shall be disclosed promptly to prevent selective disclosure.

- **Consistency**

Information disclosed shall be consistent across all communication channels.

- **Transparency**

Information shall be presented in a clear and understandable manner.

- **Confidentiality**

Sensitive or proprietary information shall be protected and disclosed only when required.

5. Types of Disclosures

The Company shall make disclosures including, but not limited to:

Financial Disclosures

- Annual Reports
- Quarterly Financial Statements
- Auditor's Reports
- Announcements made on the CSE website

Non-Financial Disclosures

- Corporate Governance Reports
- Risk Management Practices
- Sustainability Reports

Regulatory Disclosures

- Filings required by regulatory authorities
- Stock exchange disclosures

Material Event Disclosures

- Significant investments or divestments
- Mergers, acquisitions, or restructuring
- Changes in key management personnel
- Any event that may materially affect the Company's performance or reputation

6. Authority and Responsibility

Board of Directors

- Provide oversight of disclosure practices
- Ensure compliance with legal and regulatory requirements

Management

- Ensure accurate preparation and timely dissemination of disclosures
- Establish internal controls and reporting mechanisms

Company Secretary / Compliance Officer

- Monitor compliance with disclosure requirements
- Coordinate with regulators and stakeholders
- Maintain records of disclosures

Employees

- Ensure information provided is accurate and complete
- Report any material information through appropriate internal channels

7. Confidentiality and Insider Information

- Unpublished price-sensitive or confidential information shall not be disclosed without proper authorization.
- Employees must comply with insider trading laws and internal confidentiality policies.

8. Non-Compliance

Failure to comply with the Policy may result in disciplinary action and may expose the Company to regulatory penalties and reputational damage.

9. Review of the Policy

The Policy shall be reviewed at least annually, or as required, to ensure alignment with:

- Regulatory changes
- Industry best practices
- The Company's strategic objectives

The Board of Directors must approve any amendments.

10. Effective Date of Implementation

The Policy shall come into effect from 1st April 2026.

