

1. Purpose

The purpose of the Policy is to ensure that all shareholders and investors have equal and timely access to accurate and publicly available information about the Company. The Policy establishes a framework to enhance transparency, promote effective communication, and engage with shareholders and investors.

2. Introduction

Millennium Housing Developers PLC (“the Company”) is committed to fostering a transparent, constructive, and effective relationship with its shareholders and investors.

The Policy on Relations with Shareholders and Investors establishes the framework through which the Company seeks to maintain open communication, uphold high standards of corporate governance, and safeguard the rights and interests of its shareholders.

The Board of Directors recognizes the importance of engaging with shareholders and ensuring that they are provided with timely, accurate, and relevant information to enable them to exercise their rights effectively. In this regard, the Company is committed to:

- Providing shareholders with accessible information regarding the Company’s activities, performance, and governance practices.
- Communicating with shareholders in a transparent, timely, and fair manner.
- Encouraging and facilitating shareholder participation in general meetings and other shareholder engagements.
- Ensuring that shareholders have reasonable opportunities to raise questions and express their views on matters affecting the Company.

3. Scope

The Policy applies to all personnel involved in shareholder and investor relations activities, irrespective of their seniority or role within the organization.

It establishes guidelines for communication, disclosure, and engagement practices that align with regulatory requirements and promote mutual understanding between the Company and its shareholders and investors.

4. Regulatory Framework

The Policy is developed in accordance with applicable laws, regulations, and corporate governance standards, including:

- The Companies Act No. 07 of 2007.
- The Securities and Exchange Commission of Sri Lanka Act No. 19 of 2021 and related regulations.
- The Listing Rules of the Colombo Stock Exchange.
- The Code of Best Practices on Corporate Governance (2023) issued by CA Sri Lanka.

5. Objectives

The objectives of the Policy are to facilitate:

- The provision of accurate, timely, and transparent information regarding the Company's performance, strategy, and governance.
- Strengthening shareholder engagement by promoting effective communication and participation in matters of corporate significance.
- Protection of shareholder rights and ensuring that all shareholders are treated fairly and equitably.
- Efficient and responsive handling of investor inquiries, concerns, and grievances through appropriate communication channels.
- Constructive dialogue between the Company and its shareholders, encouraging mutual understanding and long-term investor confidence.
- Compliance with applicable disclosure obligations, regulatory requirements, and corporate governance standards.
- Protection of confidential, unpublished, and price-sensitive information from improper or unauthorized disclosure.

6. Communication Principles

The Company shall adhere to the following principles in its communications:

- **Transparency**

Information shall be disclosed clearly, accurately, and in an understandable manner.

- **Timeliness**

Material information shall be disclosed promptly in accordance with applicable regulatory requirements.

- **Fairness**

All shareholders shall have equal and timely access to material information.

- **Consistency**

Disclosures shall be consistent across all communication channels.

- **Compliance**

All communications shall comply with applicable laws and stock exchange requirements.

7. Communication Channels

The Company shall communicate with shareholders and investors through the following channels, including but not limited to:

- **Annual General Meeting (AGM)**

The Annual General Meeting shall serve as the primary forum for shareholders to engage with the Board of Directors and management, raise questions, and exercise voting rights.

- **Corporate Disclosures**

Material information shall be disclosed through announcements to the Colombo Stock Exchange in accordance with Listing Rules and regulatory requirements.

- **Annual and Interim Reports**

The Company shall publish Annual Reports, Interim Financial Statements, and other disclosures to provide comprehensive information on its financial performance and operations.

- **Corporate Website**

The Company's official website shall serve as a key platform for providing access to financial reports, governance documents, regulatory announcements, and other relevant information.

- **Investor Meetings**

The Company may conduct meetings, briefings, or presentations with shareholders, institutional investors, analysts, and other stakeholders to enhance understanding of its performance and strategy.

8. Financial Reporting Disclosures

The Company shall maintain high standards of financial reporting, ensuring transparency, accuracy, and reliability in all financial disclosures.

The Company shall comply with applicable accounting standards, regulatory requirements, and the Listing Rules of the Colombo Stock Exchange (CSE).

The Annual Report of the Company shall be prepared within the timeframes prescribed by the CSE and shall be published on the Colombo Stock Exchange at least fifteen (15) working days prior to the Annual General Meeting (AGM).

Shareholders who wish to obtain a printed copy of the Annual Report may do so by submitting a written request to the Company Secretary. Upon receipt of such request, a printed copy of the Annual Report shall be dispatched to the requesting shareholder within eight (8) Market Days.

The Company shall also publish its Interim Financial Statements within the timeframes stipulated by CSE Listing Rule No. 7.4(a)(i).

9. Handling Investor Complaints

The Company shall establish a systematic mechanism for addressing and resolving investor complaints in a timely and efficient manner.

Matters relating to shareholders shall be forwarded to the Company Secretary for appropriate action.

The Company shall endeavor to engage with shareholders, institutional investors, private investors, and the financial media upon request and respond to inquiries in a timely and professional manner.

10. Responsibilities

- **Board of Directors**

The Board shall oversee the Company's shareholder and investor relations practices and ensure compliance with regulatory and governance standards.

- **Management**

Management shall implement the Policy and ensure accurate and timely disclosure of information.

- **Company Secretary**

The Company Secretary shall facilitate communication with shareholders, ensure regulatory compliance, and maintain proper records.

11. Handling of Price-Sensitive Information

Price-sensitive or material non-public information shall not be selectively disclosed.

Such information shall be released to the market through appropriate regulatory channels prior to, or simultaneously with, any broader communication.

12. Shareholder Rights

The Company recognizes and respects the rights of shareholders, including the right to:

- Receive timely and accurate information about the Company.
- Participate in general meetings.
- Vote on key corporate matters.
- Receive dividends when declared.
- Communicate with the Board through appropriate channels.

13. Review of the Policy

The Board of Directors shall review the Policy periodically to ensure alignment with regulatory requirements and best practices.

Any amendments to the Policy shall be approved by the Board of Directors.

14. Effective Date of Implementation

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