



POLICY ON INTERNAL CODE OF
BUSINESS CONDUCT AND ETHICS FOR
ALL DIRECTORS AND EMPLOYEES
OF
LANKA MILK FOODS(CWE) PLC

Lanka Milk Food (CWE) PLC (“LMF”)

statement on Internal Code of Business conduct and Ethics for all Directors and employees, including policies on trading in the Entity’s listed securities

Introduction

The role of the Board of Directors (“Board”) is to provide entrepreneurial leadership of LMF (“Company”) and its subsidiaries (together, the “Group”). The purpose of this Policy is to ensure that Directors and employees of the Group adhere to the highest code of business conduct and ethical considerations in all of their activities whether specifically covered in this Policy or otherwise. This Policy applies to the Group and covers all Directors and employees of the Group, to the extent applicable.

Duties & Responsibilities

Directors and employees are entrusted to act with unwavering good faith and in the interest of the Group and its stakeholders, ensuring full compliance with governing laws and corporate policies. Directors must demonstrate a high standard of care, skill, and diligence, while employees are expected to perform their duties with professional competence and integrity.

Conflict of Interest

A conflict of interest encompasses any circumstance that undermines or appears to undermine impartiality or loyalty. Directors are obligated to comply with all relevant public monitoring regulations and disclose any actual or perceived conflicts to the Board when dealing with Group matters. Similarly, employees must immediately notify their supervisors of any conflicts they may encounter in relation to business activities and must abstain from participating in related discussions or decisions. The Group prohibits any relationships where professional integrity could be jeopardized. In instances where a potential conflict arises, the Chairman and the Board shall make appropriate decisions to resolve such matters.

Bribery and Corruption

Directors and employees are bound to act in accordance with the Company's Governance Code and ensure full compliance with the Anti-Bribery and Corruption Policy in all business interactions.

Confidentiality

Confidential and proprietary information of the Group must be safeguarded, with all precautions taken to prevent unintended disclosure. Directors and employees are prohibited from sharing any Group-related confidential details without prior authorization, except as legally mandated with Board consent. All personal data must be handled in compliance with the applicable laws, including the Personal Data Protection, Anti-Corruption, and Online Safety Acts, Regulations and best practices.

Trading in Company Shares

Directors and employees must adhere to the provisions of the Securities and Exchange Commission of Sri Lanka Act No. 19 of 2021 when engaging in the trading of the Company's listed securities. Should any Director or employee possess non-public information that could influence the share price, they are strictly prohibited from trading in the Company's shares, directly or indirectly. Furthermore, no material, non-public information may be disclosed to third parties who could exploit such knowledge for unfair advantage in the trading of the Company's shares.

Governance and Review

This Policy is governed by the Governance & Nomination Committee. To maintain its effectiveness and ensure compliance with regulatory requirements and governance standards, the Committee will oversee its implementation, conduct periodic reviews, and propose any necessary amendments to the Board for final approval.