



Policy on Internal Code of Business Conduct and Ethics for all Directors and employees, including policies on trading in the Company's listed securities

1. Purpose

This policy is to be read with the Hemas Way, published on the website of Hemas Holdings PLC ("the Company"/ "HHL") and the Share Trading Policy of the Company. This policy aims to establish a framework for ethical behavior and decision-making for all directors and employees of the Company, including policies on trading in the Company's securities.

2. Scope

This policy applies to all directors, officers, and employees of the Company.

3. Definitions

- 3.1 **Business Conduct:** The manner in which the Company conducts its business operations, including interactions with stakeholders.
- 3.2 **Ethics:** Moral principles that govern behavior and decision-making.
- 3.3 **Insider Trading:** The buying or selling of the company's securities by someone who has access to material, non-public information about the company.

4. Core Values

- 4.1 **Integrity:** Act with honesty and integrity in all business dealings.
- 4.2 **Respect:** Treat all individuals with respect and dignity.
- 4.3 **Responsibility:** Take responsibility for actions and decisions.
- 4.4 **Transparency:** Promote open and honest communication.
- 4.5 **Compliance:** Adhere to all applicable laws, regulations, and company policies.

5. Standards of Conduct

- 5.1 **Compliance with Laws and Regulations:** Adhere to all applicable laws, regulations, and internal policies of the Company.
- 5.2 **Conflicts of Interest:** Avoid conflicts of interest and disclose any potential conflicts.
- 5.3 **Fair Dealing:** Conduct business fairly and honestly, and avoid unfair practices.



- 5.4 **Confidentiality:** Protect confidential information and do not disclose it unless authorized or legally required.
- 5.5 **Protection and Proper Use of Company Assets:** Use company assets responsibly and protect them from loss, theft, and misuse.
- 5.6 **Workplace Conduct:** Foster a respectful, safe, and inclusive workplace.

6. Trading in shares of the Company

- 6.1 Trading in shares of the company to be carried out by directors and officers of the Company in compliance with the applicable laws and regulations including the Listing Rules of the Colombo Stock Exchange and the Share Trading Policy of the Company.

7. Review and Continuous Improvement

- 7.1 **Policy Review:** The Board of Directors will review this policy annually or as needed to ensure its effectiveness and relevance.
- 7.2 **Continuous Improvement:** Incorporate feedback and best practices to enhance the code of conduct and ethics.

8. Policy Approval and Review

- 8.1 This policy is approved by the Board of Directors for implementation w.e.f. 1st October 2024 and will be reviewed annually or as needed.