

SINGER FINANCE

POLICY ON TRADING IN THE COMPANY'S LISTED SECURITIES

In Compliance with CSE Listing Rule 9.2.1 (e.2)

VERSION 2.0

**SINGER FINANCE (LANKA) PLC
POLICY ON TRADING IN THE COMPANY'S LISTED SECURITIES**

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POLICY ON TRADING IN THE COMPANY'S LISTED SECURITIES

1. PURPOSE

The purpose of this policy is to ensure transparency and accountability in trading in listed securities by KRPs (Key Responsible Persons) and any other employees involved in the financial reporting (hereinafter referred to as Key Employees) of the company. This policy outlines the cooling -off period for trading, monitoring and disclosure requirements that KRPs and key employees must adhere to when trading in listed securities of the company. This policy covers the part relating to Trading in Entities Listed in the Securities section of the CSE listing rule 9.2.1 (e) which is prepared in two sections.

2. SCOPE

This policy applies to all KRPs and key employees in the company who purchase listed securities of the company, whether directly or indirectly, regardless of the number of securities purchased.

3. GUIDELINES AND REGULATIONS

This policy is subject to applicable guidelines and regulations, including but not limited to the Section 8.6 -Trading by Connected Parties under Section 8 of Listing Rules of Colombo Stock Exchange, Directive issued under Section 13 (C) and (CC) of the Securities and Exchange Commission of Sri Lanka ACT No. 36 of 1987, Circular No. 01/2024 of Colombo Stock Exchange, Code of Best Practice of Corporate Governance 2023 issued by CA Sri Lanka.

4. MONITORING

The company will monitor all purchases of listed securities by KRPs and key employees in the company. The monitoring process will include the following steps:

- a) KRPs and Key employees must notify the company secretary of any intention to purchase listed securities in the company.
- b) The company secretary will monitor all listed security purchases by KRPs and key employees and maintain a record of all purchases.
- c) The company secretary will report any significant listed security purchases to the board of directors.
- d) The board of directors will review the listed security purchases and determine whether the purchases made contravene the rules, regulations and guidelines of the CSE , SEC , CBSL and or The Code of Best Practice of Corporate Governance 2023 issued by CA Sri Lanka.

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5. TRADING COOLING-OFF PERIODS

KRP's , and employees shall not engage in purchase or sale transactions in Singer Finance during the period from fifteen (15) business days prior to the end of a quarterly (where applicable), semi-annual or annual reporting period, until two business days following the date upon which the results for such period are reported to the public. These are the minimum number of days for which trading is not allowed

If any market sensitive information such as (but not limited to) imminent dividend payment , acquisition , or merger is privy to any KRP or employee, he or she shall not engage in trading of securities of the Company either in person or through a proxy until , two marketing days after disclosure of such information to the Colombo Stock Exchange.

Should a Key Responsible Person (KRP) or an employee harbor any uncertainty concerning the timing of trading (buying and selling) securities of the company, it is imperative that they seek guidance from the Company Secretary or abstain from engaging in share transactions. This course of action is essential to preclude inadvertent violations.

6. DISCLOSURE

KRPs and Key employees must disclose all purchases of listed securities in the company to the company secretary immediately up on completion of the transaction. The disclosure must include the following information:

- i. The date of purchase
- ii. The number of securities purchased
- iii. The price paid for the securities
- iv. The method of payment
- v. The source of funds used to purchase the securities

The company secretary will maintain a register of all listed security purchases by KRPs and key employees, which will be available for inspection by shareholders upon request.

7. BREACH OF POLICY

Any breach of this policy may result in serious disciplinary action which could lead to termination if found guilty.

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8. REVIEW

This policy will be reviewed once in two years by the board of directors to ensure its effectiveness and relevance. Any necessary changes will be made in consultation with the company secretary and legal advisors.



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