

# INFORMATION DISCLOSURE POLICY

#### 1. Introduction

Seylan Bank PLC ("the Bank") is committed in providing timely, orderly, consistent balanced disclosures of information about its business and financial results, consistent with legal and regulatory requirements.

The Bank considers that transparency and accountability are fundamental to fulfill its vision and to strengthen public trust in its stakeholders. This Policy reaffirms and reflects the Bank's commitment to transparency and promotion of good governance.

Likewise, the Bank commits to compliance with applicable laws and regulations to provide fair disclosure of material information to the public, while simultaneously undertaking not to disclose any information relating to the business or affairs of its customers.

This Policy will address disclosures that are made by the Bank which relates to Corporate, Financial information as well as all other types of relevant disclosures of the Bank.

## 2. Scope and Objective

The main purpose of this Policy is to govern information that is Disclosed by the bank in the form of financial information, Governance Information, Risk Information and any other relevant information that requires to be disclosed to shareholders, existing and potential investors, customers, creditors and other stakeholders (including public) and employees, in a timely manner and in an accurate, fair, complete, comprehensible, comparable and efficient way.

The goal of this Information Disclosure Policy is to educate the public about how information about the Bank's operations may be made available to the public as prescribed by the Applicable Laws & Confidentiality Agreements.

This Information Disclosure Policy sets out the Bank's approach to information disclosure with the objective of promoting the highest levels of transparency, accountability and integrity. At the same time, the Bank recognizes the need to classify certain types of information and apply due process in deciding on the disclosure of such information.

Other policies and rules issued by the Bank relating to information disclosure to the public shall accord with this Policy if the subject information concerns the information defined in this Policy.

## 3. Authorization and Responsibilities

#### 3.1 Authority

The Risk Management Unit, under the guidance of the Chief Risk Officer (CRO), is responsible for drafting and proposing amendments to the Policy and the Guidelines issued to implement the Information Disclosure Policy. Other relevant departments shall participate in drafting amendments and issuing implementation guidelines for this Policy

#### 3.2 Version Control and Review

In order to ensure the continued validity and application of this Policy, review will be conducted at least on an annual basis, and more often as may be deemed necessary, to reflect relevant changes in the business environment, operational updates and implementation experience.

#### 3.3 Release

The Policy is a public document and it will be displayed in the Bank's official website, in line with the Banks principles on transparency and intention to share information with the public. A list of key public Bank documents and disclosed information shall be published on the website of the Bank www.seylan.lk. The list shall be regularly updated and developed as the operations of the Bank evolves.

## 4. Information Disclosure Committee (IDC)

The Bank shall have a dedicated Disclosure Committee, dedicated for the purpose of managing and having oversight of the disclosures of the bank.

# 6. Corporate Disclosure

As per the CSE Listing Rules, Section 8 Corporate Disclosure the listed companies are required to immediately disclose price sensitive information of listed entities in Sri Lanka.

Listing Rules of the Colombo Stock Exchange (as amended in 2023) also stipulates the requirement to establish and maintain a suitable process for the periodic evaluation of the performance of Board of Directors.

Under the Corporate Governance Rules applicable to listed entities which are listed in the current rules 7.10 and Section 9 of the Listing Rules of the Colombo Stock Exchange (CSE) have been revised by the CSE and the said amendments have been approved by the Securities Exchange Commission of Sri Lanka (SEC).

# 7. Contents of the Information Disclosure Policy

The Information Disclosure Policy outlines and is not limited to the following areas in disclosures of Seylan Bank PLC:

- 1. Introduction
- 2. Scope and Objective
- 3. Authorization and Responsibilities

- 4. Information Disclosure Committee (IDC)
- 5. General Principles of the Disclosure Policy
- 6. Methods and Means of Public Disclosure
- 7. Measures to Keep the Confidentiality of Material Events Until Public Disclosure
- 8. Corporate Disclosure
- 9. Public Disclosures Relating to Stake Holders of the Bank
  - 9.1 Public Disclosures Policy
  - 9.2 Corporate and Financial Disclosure
  - 9.3 Corporate and Financial Disclosures
  - 9.4 Shareholder Meetings
  - 9.5 Market Sensitive Information
  - 9.6 Announcement to the CSE Immediate Disclosure of Price Sensitive Information
  - 9.7 Shareholders or debenture holders Privacy
- 10. FINANCIAL DISCLOSURES
  - 10.1 Public Disclosure of Financial Statements
  - 10.2 Analyst reports and forecasts
- 11. Disclosures relating to Marketing and Promotional Material
- 12. Cyber security incidents
- 13. Corporate Website
- 14. RISK MANAGEMENT DISCLOSURES
  - 14.1 Credit Risk
  - 14.2 Market Risk
  - 14.3 Operational Risk
  - 14.4 Mandatory Risk Disclosures
- 15. General Disclosure Requirements
  - 15.1 Reviewing Third Party Reports
  - 15.2 FORWARD-LOOKING INFORMATION
  - 15.3 BRIEFING
  - 15.4 MAINTAINING CONFIDENTIALITY OF CUSTOMER INFORMATION
  - 15.5 INSIDER TRADING & TRADING RESTRICTIONS
  - 15.6 Withholding Price Sensitive Information
  - 15.7 Quiet Period
- 15.8 KEEPING OF DISCLOSURE RECORDS

### 8. GENERAL COMMENTS

This policy has been compiled taking to account regulatory and internal guidelines which may change from time to time and will be applicable to the information so disclosed irrespective of the policy being updated as at the respective dates of change in the guidelines

The provisions in this Policy to be read in conjunction with the Shareholder Communication Policy of the Bank in order to avoid any interpretational gap of provisions between the two Policies..." or some other wording equivalent to

This Policy has been approved by the Board of Directors of Seylan Bank PLC