



**POLICY ON INTERNAL CODE OF BUSINESS
CONDUCT AND ETHICS FOR ALL DIRECTORS
AND
EMPLOYEES, INCLUDING POLICIES ON
TRADING IN THE ENTITY'S LISTED SECURITIES**

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1. Vision of the Internal code of Business conduct and Ethics

“To become a premier finance company in Sri Lanka” “Empowering people and transforming lives”

1.1 Customers

The solutions we provide for our customers' financial needs would be unconventional, innovative and relevant for their needs to improve their quality of life whilst maintaining superior levels of customer service which would go well beyond their expectations.

1.2 Shareholders

Build shareholder value and provide substantial shareholder returns through relentlessly improving our performance and operations with sustainable effective strategies.

1.3 Family of Employees

A Company that fosters and harnesses equality among employees along with personnel development and to create the perfect work-life balance in the organization.

1.4 s Society

To be an ethical financial service provider, promoting the betterment of the societies we work and live in while maintaining transparent financial records and practices. We aim to provide financial solutions to all segments in our society and eliminate financial exclusion in our society.

2. Values of the Asia Asset Finance PLC

1. Honesty and Integrity
2. Flexibility
3. Innovation
4. Passion for Excellence
5. People Oriented
6. Genuine Concern for the Client

3. Introduction

To promote honest & ethical conduct and adherence with the law, particularly as related to the corporate governance of Asia Asset Finance PLC (the “Company”). Noncompliance with applicable ethics and conducts & regulations can result in significant legal and regulatory exposure to the company, as well as cause serious reputation harm. The Company’s Code of Conduct policy applies to this policy.

4. Scope

This policy applies to all staff of the Company including directors, permanent, contract, casual & trainee staff.

The target group of this policy should make a commitment to comply, and it should promote integrity, accountability and ethical conduct. This policy has been especially formulated for all Directors and all Employees to act in accordance with set norms on desired behavior complying with all applicable laws and regulations while maintaining high professional and ethical standards.

4. Honest & Ethical Conduct

The Company requires honest and ethical conduct. This policy requires all directors and employees to act in good faith, with honesty and integrity, with due care and without misrepresenting facts or allowing independent judgment to be subordinated to personal interests. The directors and employees are personally responsible for their own conduct.

and have a moral and, in some cases, a legal obligation to call to the Company attention violations of this policy by others. All staff members are expected to conduct themselves professionally internally and externally of the Company. Also, the employees encourage to follow the whistle Blower policy for the Company's benefit.

All Directors and employees are required to demonstrate integrity and professionalism in the workplace. They must act with honesty and reliability in all negotiations involving the relevant interests, ensuring that any commitments made are honored. Employees must maintain consistency in customer service and protect the confidentiality of any information they acquire regarding the company, as well as information pertaining to employees and stakeholders. The Directors and Employees are strictly prohibited from offering or accepting gifts, invitations, privileges, or any form of incentive that could influence or bias business decisions. Generally, employees must refrain from accepting any gifts for any reason from customers or other stakeholders.

Employees must avoid or report any conflicts of interest that could result in personal priorities being placed ahead of the Company's interests. They must act with integrity at all times. Employees are forbidden from using their position or connections within the Company for personal gain or to benefit third parties. Additionally, they are prohibited from hiring or encouraging the hiring of family members for professional services related to the Organization's business.

5. Core Values

Integrity: The company committed to honesty, fairness, and transparency in all the dealings and integrity is the foundation of trust and is essential for long-term success.

Respect: Everyone must work with dignity, respect, and fairness, diverse perspectives and promote a culture of inclusion.

Responsibility: Take responsibility for the actions, decisions, and accountable to the stakeholders.

Compliance: The company adhere to all applicable laws, regulations, and internal policies to maintain the highest standards of ethical conduct.

Excellence: For excellence in services and relationships and dedicated to continuous improvement and innovation.

5. Compliance

- Adhere to all applicable laws, rules, and regulations in the jurisdictions applicable to the Company.
- Follow internal policies and procedures designed to ensure compliance with legal and regulatory requirements.
- Regularly update training programs to keep employees informed about change laws and regulations.

6. Employees' Awareness

Proprietary or client information must not be exploited for personal advantage. Any non-public

information is regarded as insider information and must not be used for personal gain or shared with others. Directors and employees are prohibited from pursuing personal opportunities identified through the Company resources without obtaining prior approval.

7. Family Relationships in the Industry

Employees who intend to engage in business with family members or relatives are required to disclose their relationship and secure prior written consent from the CEO. Additionally, if a family member is a competitor, this must be reported. It is essential that employees safeguard the confidentiality of the Company information at all times.

8. Bribery, Corruption, and Commissions

Any form of bribery or corruption is strictly forbidden. Directors and employees are not permitted to solicit, accept, or provide any kind of payment or undue advantage for personal gain or to favor others in business transactions.

9. Fair Dealing

- Conduct business fairly and honestly with clients, suppliers, competitors, and employees.
- Do not engage in unfair or deceptive practices.
- Ensure that marketing and advertising are truthful and not misleading

10. Participation in Political Activities

Directors and employees participating in political activities must disclose to the Company. It is prohibited to pressure others into making political contributions. Employees are required to notify and obtain approval from the Compliance Department before becoming involved in political activities, while Directors must keep the Board updated on their political interests. The Company has authority to screening all directors and employees regarding their political exposure.

11. Media Contact

All media inquiries related to the Company's activities, or its personnel must be referred to the Head of Branding with the advice of the Chief Operating Officer (COO) and/or Chief Executive Officer (CEO). Employees and Directors are not permitted to represent the company, provide statements, or share any information with the media unless they have received explicit authorization to do so. This ensures that all communication remains consistent, accurate, and aligned with the company's strategic messaging. Unauthorized disclosure of company information may lead to misinformation, damage to the company's reputation, and potential legal implications. Therefore, only designated personnel are entrusted with managing media relations, safeguarding the integrity of the Company's public image

12. Social Media

Only designated employees are permitted to handle the Company's social media platforms. All employees must exercise caution when using social media, even in a personal capacity, as online activities can impact the company's reputation. Sharing confidential or sensitive information is strictly prohibited, and the use of social media during work hours is not allowed. Employees must refrain from posting or sharing any confidential details related to the Company, its operations, or its personnel to protect the company's integrity and confidentiality.

13. Use of the Company's Assets

Employees are required to utilize the Company's assets—both physical and non-physical—solely for valid business reasons and must safeguard them against improper use. Any suspected theft or loss must be reported without delay.

14. Customer Relationships

15.1 Fair Treatment

The Company is dedicated to delivering outstanding customer service while ensuring that all customers are treated equitably and with transparency. Employees are expected to refrain from showing favoritism towards any individual and must not exploit customer information for their own benefit. Upholding integrity in our interactions is crucial, as it fosters trust and respect between the Company and its clientele. By prioritizing the needs of the customers and adhering to these principles, aim to build long-lasting relationships based on mutual respect and understanding.

15.2. Protecting Customer Data

Employees are prohibited from disclosing confidential customer information to any third parties under any conditions.

16. Trading in Securities

Directors and Key Responsible Personnel(KRP) must notify the Company Secretary of any trades in company securities as follows. Those with access to sensitive information are prohibited from trading until a specific period has elapsed after public disclosure.

- a) Failing to adhere may result in significant repercussions, such as disciplinary measures and potential legal consequences. Employees are encouraged to report any violations confidentially and without the fear of retaliation. However, making false reports is strongly discouraged.
- b) Authority and Responsibility - Management may modify or withdraw this Code as needed. Employees are expected to familiarize themselves with all relevant laws and the company policies.
- c) Declaration

- d) All Directors and KRP must submit an annual compliance declaration Requirement on Trading in Securities of the Listed entities

Directors KRP shall immediately inform the Company secretary if they trade in securities of the listed entities. Directors KRP and all other employees who is privy to price sensitive information shall not trade in listed entities securities within the stipulated time frames as per section 8.6

- e) Trading by Connected parties

Connected person should not trade borrow or lend on the basis of price sensitive information that has not been disclosed to the public. Moreover, connected person shall not trade borrow lend securities of the listed entity even after release of the price sensitive information to the exchange for a period which should be prior to five market days and two market days after the release of the information to permit through public dissemination and evaluation thereof.

Review, Monitor and Update of the Policy

As the owner of the policy, Compliance officer shall be responsible to review the policy at least annually or more frequently as necessary. Any changes and amendments should be documented with rationale and to be presented to the Nomination and Governance committee for review and approval