

# Policy on Corporate Disclosures

Co-operative Insurance Company PLC

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## 1. Purpose

This policy establishes guidelines for timely, accurate, and transparent disclosure of information by Co-operative Insurance Company PLC in compliance with the regulations of the **Colombo Stock Exchange (CSE)**, the **Securities and Exchange Commission of Sri Lanka (SEC)**, and global best practices in corporate governance.

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## 2. Scope

This policy applies to all disclosures, whether mandatory or voluntary, including financial statements, corporate announcements, material information, and other communications with shareholders, regulators, and the public. It covers disclosures made through the company's Annual Reports, press releases, regulatory filings, investor presentations, and the corporate website.

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## 3. Objectives

- To ensure compliance with statutory and regulatory disclosure requirements.
  - To provide stakeholders with accurate and timely information for informed decision-making.
  - To enhance the company's reputation for transparency, accountability, and ethical practices.
  - To mitigate risks associated with incomplete or misleading disclosures.
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## 4. Key Disclosure Principles

### 4.1 Accuracy and Completeness

- All disclosures must be accurate, complete, and free of misleading information.
- Supporting documentation must be maintained to substantiate the accuracy of disclosed information.

## 4.2 Timeliness

- Disclosures must be made promptly, particularly regarding material events or information that could influence investor decisions.

## 4.3 Transparency

- The company shall disclose both positive and negative information that is material to stakeholders, demonstrating transparency and integrity.

## 4.4 Compliance

- Disclosures shall adhere to the requirements of the **CSE Listing Rules, IRCSL regulations, and Companies Act No. 7 of 2007.**

## 4.5 Equal Access to Information

- All stakeholders, including shareholders, regulators, and the public, shall have equal access to disclosed information through appropriate channels.
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# 5. Categories of Disclosures

## 5.1 Mandatory Disclosures

- **Financial Reports:**
  - Quarterly financial statements, audited annual financial statements, and related notes prepared in accordance with **Sri Lanka Accounting Standards (SLFRS).**
- **Material Events and Changes:**
  - Significant changes in shareholding, Board composition, business operations, or financial performance.
- **Regulatory Filings:**
  - Filings required by the **CSE** and **SEC**, including Annual Reports, Circulars, and Notices.

## 5.2 Voluntary Disclosures

- Sustainability reports and updates on Environmental, Social, and Governance (ESG) initiatives.
  - Market communications, including press releases and investor updates.
  - Information about new products, partnerships, or innovations.
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## 6. Disclosure Process

### 6.1 Responsibility for Disclosures

- The **Board of Directors** is ultimately responsible for ensuring accurate and timely disclosures.
- The **Company Secretary** shall coordinate regulatory filings and public announcements.
- The **Chief Financial Officer (CFO)** shall oversee the preparation and accuracy of financial disclosures.

### 6.2 Approval of Disclosures

- All disclosures, particularly material information, must be approved by the Board or a designated committee before release.

### 6.3 Disclosure Channels

- Disclosures shall be made through the following channels:
  - Regulatory platforms such as the CSE portal.
  - The company's official website and social media accounts.
  - Press releases distributed to reputable media outlets.

### 6.4 Language and Presentation

- Disclosures shall be presented in clear, concise, and plain language to ensure accessibility.
  - Where necessary, disclosures shall include visual aids such as charts and tables to improve comprehension.
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## 7. Material Information and Continuous Disclosure Obligations

### 7.1 Definition of Material Information

Material information refers to any information that could influence the decision of investors, such as:

- Mergers, acquisitions, or disposals of significant assets.
- Changes in key management or Board composition.
- Declaration of dividends or changes in dividend policy.
- Legal proceedings or regulatory investigations.

## 7.2 Continuous Disclosure

- The company shall promptly disclose material information as it arises, in accordance with the CSE's continuous disclosure requirements.
  - Updates or corrections to previously disclosed information must be communicated promptly.
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# 8. Stakeholder Communication

## 8.1 Shareholder Engagement

- Shareholders shall be informed about company performance, strategic plans, and governance practices through:
  - Annual General Meetings (AGMs).
  - Periodic reports and newsletters.

## 8.2 Investor Relations

- A dedicated **Investor Relations Team** shall handle inquiries, presentations, and meetings with institutional investors and analysts.
  - Regular updates on company performance and developments shall be provided through investor briefings.
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# 9. Insider Trading and Confidentiality

## 9.1 Insider Trading Policy

- Directors, employees, and other insiders are prohibited from trading in the company's securities while in possession of unpublished price-sensitive information.

## 9.2 Confidential Information

- All unpublished material information must remain confidential until officially disclosed.
  - Unauthorized disclosure of confidential information shall result in disciplinary action.
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## **10. Compliance and Monitoring**

### **10.1 Internal Controls**

- Robust internal controls shall ensure the accuracy and reliability of disclosed information.
- The company shall regularly review its disclosure processes to ensure compliance with applicable laws and regulations.

### **10.2 Audit and Verification**

- The Audit Committee shall periodically review the company's disclosures to ensure compliance and identify improvement areas.
  - External auditors shall verify the accuracy of financial disclosures during the annual audit.
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## **11. Training and Awareness**

- Regular training programs shall be conducted for directors, management, and employees to:
    - Enhance awareness of disclosure requirements.
    - Ensure adherence to the company's disclosure policy and regulatory obligations.
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## **12. Policy Review and Updates**

- This policy shall be reviewed annually by the Board of Directors or as required to address changes in laws, regulations, or best practices.
  - Any amendments to the policy must be approved by the Board.
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**Approved by the Board of Directors**