

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

1. Purpose

The Board of Directors and the management of Serendib Land PLC ('the Company') are committed to maintaining the highest standards of ethical behavior and integrity in all aspects of the Company's operations. The purpose of this Code is to foster a culture of ethical decision-making and behavior, promote a workplace that is fair, transparent, and compliant with all applicable laws, prevent conflicts of interest and ensure accountability in the decision-making process and protect the Company's reputation and ensure the confidence of investors, customers, and the public in the integrity of the Company's activities.

2. Ethical Business Standards adopted by the Company

- Act with integrity, fairness, and honesty in all dealings with all the stakeholders.
- Avoid conflicts of interest where personal interests conflict, or could be perceived to conflict, with the interests of the Company.
- Comply with applicable laws, regulations, and standards.
- Respect confidentiality and protect confidential and proprietary information about the Company.
- Act in the best interest of the Company and its stakeholders, prioritizing the Company's long-term success over short-term personal gain.
- All forms of corruption, bribery and payments of commission are prohibited

3. Policy on Trading in the Company's listed securities

All Directors and employees shall comply with all applicable securities laws, including those related to insider trading, to prevent improper trading in the Company's listed securities. This policy aims to ensure that no person takes advantage of non-public, material information to trade the Company's securities or shares of any other entity.

All Directors and employees shall comply with insider trading regulations and refrain from trading on material, non-public information that could provide an unfair advantage or harm the Company's reputation.

All Directors and employees shall report any suspected violations of the code, Company policies, or laws, and they shall ensure that mechanisms are in place for investigating such reports confidentially and without retaliation, promoting a culture of accountability.

4. Amendments to the Policy

This Policy on Internal Code of Business Conduct and Ethics and the Policy on Trading in the Company's Listed Securities may be amended or modified by the Board of Directors as necessary to reflect changes in laws, regulations, or best practices.