

Commercial Credit and Finance PLC

Anti Discrimination Policy

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1. Introduction

Commercial Credit and Finance PLC (CCFP) is unwavering in its commitment to fostering an inclusive and accessible environment for all stakeholders. This Accessibility and Anti-Discrimination Policy delineates our dedication as a company to ensuring accessibility and outlines the measures we are undertaking to guarantee that our organization is accessible to all.

The primary objective of this policy is to provide a comprehensive guideline to CCFP for the design of products, services, or environments, ensuring their acceptability for individuals across diverse categories. We are committed to collaborating with our employee networks to cultivate an environment where all the stakeholders feels included and supported, devoid of any form of discrimination. This policy further aims to facilitate equal access for people with different physical abilities (differently able) to information and resources, mirroring the opportunities available to individuals without those different abilities.

2. Version Control

This policy will be reviewed once every two(2) financial years or in the event of any changes in the regulatory or environmental requirements. The updates will be recorded in the Version Control Section.

| Version Code | Release Date | Prepared by | Approved by |
|--------------|-------------------------------|--------------------|--------------------|
| 1.0 | 31 st January 2024 | Compliance Officer | Board of Directors |

3. Scope

This policy applies to all stakeholders associated with CCFP. In instances where there may be inconsistencies between the requirements of the Consumer protection directives of the Central Bank of Sri Lanka (CBSL) and the policy outlined in this policy, the regulations set forth by CBSL shall take precedence.

4. Legal Framework

- a) The following legal provisions are applicable for this policy
 - i. The Financial Consumer Protection Regulation No. 01 of 2023 Issued by the Central Bank of Customer.
 - ii. Other relevant directions issued by the CBSL under the Finance Business Act No 42 of 2011.

- b) CCFP Polices and Procedures relevant to this policy
 - i. Anti Sexual Harassment Policy
 - ii. Complaint Handling Policy
 - iii. Ethical Framework
 - iv. Whistle blower policy
 - v. Value Policy
 - vi. HR Policy and Procedures
 - vii. KBG Document

5. Roles and Responsibilities

All employees are responsible for aligning with this policy. The management is responsible for formulating the Anti Discrimination policy of the Company which should be approved by the Board of Directors.

6. Our Culture and Shared Values

Embraced by our unique culture based on purpose, shared values, and principles we are committed to cultivating an environment where every individual is accorded equal and rightful opportunities, devoid of discrimination. CCFP is unwavering in its dedication to maintaining a principle-based workplace that is not only free from discrimination and harassment but also a diverse and respectful environment for all stakeholder. This Anti-Discrimination Policy serves as a testament to our commitment to build leaders who uplift the life of people.

We understand the intrinsic value of diversity and pledge to treat every individual with the utmost respect and fairness. By upholding these principles, we strive to create a workplace that not only adheres to our shared values but also stands as a beacon against any discrimination based on race, color, religion, sex, gender identity or expression, sexual orientation, national origin, genetics, different abilities, age, etc.

7. Prohibition of Discrimination

CCFP strictly prohibits discrimination on the basis of race, color, religion, sex, gender identity or expression, sexual orientation, national origin, genetics, different ability, age, or any other characteristic protected by applicable law. The Sri Lankan Constitution guarantees the right to equality before the law and equal protection of the law of all persons (Article 12). This prohibition applies to all employment decisions, as well as interactions within the workplace and with customers.

7.1 Harassment-Free Environment

Harassment, whether verbal, physical, or visual, that is based on any of the aforementioned protected categories, is strictly prohibited. This includes, but is not limited to, slurs, derogatory comments, unwelcome advances, and any other unwarranted conduct that creates an intimidating, hostile, or offensive work environment.

7.1.1 Verbal Harassment

The Company strictly prohibits use of offensive language, slurs, or derogatory remarks when communicating with the customers and all the stakeholders.

7.1.2 Physical Harassment

The CCFP strictly prohibits employees to engaged in unwanted physical contact or threatening gestures with the customers and all the stakeholders.

7.1.3 Visual Harassment

It is prohibited to display any offensive images, materials, or any form of visual harassment to the customers and all the stakeholders.

7.1.4 Cyber Harassment

Harassment through electronic communication channels, including emails, social media, or other online platforms are prohibited.

7.2 Equality and Fair Treatment

The CCFP is committed to ensuring the rights of diverse groups of people to have a similar social position and receive the same treatment, ensuring that every individual has an equal opportunity to make the most of their lives and talents.

7.2.1 Gender Equality

Promoting gender equality encompasses fostering equal opportunities, rights, and treatment for individuals of all genders. It includes understanding of gender and seeks to ensure fairness, dignity, and inclusivity for everyone, regardless of their gender identity or expression. The Company actively supporting gender equality for every gender, we strive to build a more just and equitable world that recognizes and values the diverse experiences and capabilities of all individuals.

7.2.2 Fair Treatment to Women

CCFP aspires to cultivate an inclusive environment where individuals, irrespective of gender, can thrive and contribute to the fullest extent of their abilities.

- Ensuring fair treatment for women is a fundamental principle upheld by the company. This commitment encompasses the provision of equal opportunities, rights, and privileges to women, aligning with those afforded to their male and other counterparts in all instances involving both employees and customers. Fair treatment shall extend to addressing issues such as representation, and protection from discrimination and violence.

- Designing products and services that are suitable for the financial inclusion and access of women, recognizing and meeting their unique needs.
- Establishing a work environment and supporting systems that proactively prevent any form of discrimination, fostering an atmosphere of equity, respect, and inclusion for all .

8. Reporting and Investigation

CCFP is committed to promptly and thoroughly investigating all complaints and take appropriate corrective action.

8.1 Complaint Received by Employees

Any employee who believes they have experienced or witnessed discrimination or harassment against themselves or customer or potential customer or any other stakeholder is encouraged to report the incident promptly to the related resolving party involved in the particular incident (Management ,Supervisor, Confidant, Mentor etc.Further Refer the whistle blow policy for further information). They can either make a written complaint or verbal complaints, whichever is most comfortable to them. Such complaints can be made to the above individuals or to the Caring Ambassador. Further employees can address such matters anonymously can use the HRIS, grievance and suggestions system to report incidences.

8.2 Direct Customers Grievances

All staff members are trained to provide the best possible service to customers without any discrimination. However, if they have any concern or grievance related to any discrimination, CCFP welcome their comments and feedback. Customers can lodge their grievances and with regard to our products or services using following methods.

- Contacting the relevant Location Head
- Contacting our hotline 0112 000 000

- Emailing to: ccl@cclk.lk
- Whats App to call center manager on telephone number: +94 076 870 9397
- Write to: Head Office - No. 106, Yatinuwara Veediya ,Kandy
City Office - No 165, Kynsey Road Colombo 08.

If our resolution does not meet the relevant parties expectations, a direct complaint can be addressed to the Financial Ombudsman who is available for redress. He has the power to inquire and resolve any complaints and disputes between customers and financial institutions covered by the Ombudsman Scheme.

➤ The Current Financial Ombudsman:

- ◆ Mr. Ananda Kumaradasa
- ◆ Office: 43A Vajira Road, Colombo 5
- ◆ Tel: +94 11 259 5624Tel/Fax: +94 11 259 5625
- ◆ Email: fosril@sltnet.lk

9. Retaliation

Retaliation against individuals who report discrimination or harassment, or who participate in an investigation, is strictly prohibited. CCFP is dedicated to protecting the rights of those who come forward with complaints/incidents and ensuring a retaliation-free work environment. CCFP expects all employees and other individuals/entities associated with the organization to comply with this Anti-Discrimination Policy. Violations may result in disciplinary action as per the CCFP Ethical Frame work , HR polices and procedures.

10. Conclusion

By adhering to this Anti-Discrimination Policy, CCFP seeks to create a diverse and inclusive workplace where all individuals are treated with dignity and respect. We are committed to fostering an environment that values the unique contributions of each person and promoting equal opportunities for all.

End of the document

Recommended by the BIRMC on 11.01.2024

Approved by the BOD on 31.01.2024