

Commercial Credit & Finance PLC

Whistle-blower Policy

(This replaces all previous documents covering the operating metrics of the Whistle-Blower Policy)

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1. Introduction

The Company is committed to conducting its business with honesty and integrity and we expect all staff to maintain high standards in accordance with our policies and procedures.

The company has adopted the Whistle-blowers’ policy to deter and detect malpractices, unethical activities and illegal conduct and to ensure genuine concerns which, an employee knows or has reason to believe to exist are raised at an early stage in utmost confidentiality and responsibly.

Company’s policy is to ensure that genuine concerns are thoroughly investigated, appropriate and proper action is taken on the outcome of investigations.

This policy ensures that there will no retribution or penalization in any way for disclosure.

2. Version Control

This policy will be reviewed once every three (3) financial years or in the event of any changes in the regulatory requirements. The updates will be recorded in the “Version Control” with details of revisions and effective dates. The policy should be recommended by the Audit Committee for the approval of the Board of Directors.

Version Code	Release Date	Prepared by	Approved by
1.0	November 2020	Compliance Officer	Board of Directors
2.0	January 2023	Compliance Officer	Board of Directors

3. Objectives

The main objectives of the policy are as follows.

1. To encourage staff to report (Blow the whistle on) wrongdoings as soon as possible.
2. To provide guidelines on how to raise a concern.
3. To provide a guideline on how suspicions of wrongdoings will be taken up for investigation.

4. To set procedures to protect the confidentiality & protect of whistle-blowers
5. To ensure that whistle-blowers will not suffer any retribution for disclosure made in good faith

4. Scope of this Policy

This policy applies to everyone who carries out work for the company, including but not limited to:

- All directors and employees including trainees and staff under contract basis
- Outsourced staff
- Consultants

5. Whistle blowing

Whistle blowing is the disclosure of information, which relates to cases where the user genuinely and in extreme good faith believes that a suspected wrongdoing (generally a breach of a legal, statutory or regulatory requirement or unethical, immoral behavior). The staff are encouraged to report serious instances of malpractices and unethical behavior observed even if the evidence cannot be fully substantiated.

In the case of known suspected frauds or misappropriation where it is necessary to prevent losses to the company or its customers, whistle-blowers should promptly report the matter verbally or in writing to the Executive Management or Confidant Network or Mentors giving all the details. However, verbal reporting is only encouraged when the matter is utmost urgent to prevent or detect the possible fraud or misappropriation.

This includes the disclosure of but not limited to the wrongdoings listed below examples of wrongdoings.

1. A criminal offence has been committed, is being committed or is likely to be committed or is likely to be committed
2. A person(s) dealing with the company has failed, is failing or is likely to fail to comply with any legal obligations
3. Miscarriage of justice has occurred, is occurring or likely to occur
4. Health and safety of any individual has been, is being or is likely to be endangered

5. Failure to comply with Policies and procedures established by the organization
6. Information concerning any of the above circumstances has been, is being or is likely to be deliberately concealed
7. Acts of any form of improper management practice including (but not limited to) bullying, harassment or discrimination are being practiced.
8. Damage to the environment
9. Unauthorized use of company funds.
10. Any other forms of fraud and corruption
11. Unethical conduct, sexual or physical abuse
12. Waste of company resources due to negligence

6. Reporting a concern

Whistle-blowers may submit any concerns or allegations of malpractices, unethical behavior and/or illegal conduct for investigation in writing marked “Strictly Confidential” or verbally through the channels given below.

1. Any employee of the organization should forward the allegation or the suggestion through the dedicated E-mail address given below.

Whistleblower@cclk.lk

2. Alternatively, any employee may channel his/her concern by email, by telephone or through signed letter to all or any one of the following persons whose email addresses are listed below.

Designation	Email Address
Chairman of the Board	girisa1964@gmail.com
Senior Independent Director / Chairman of the Integrated Risk Management Committee	lasanthawickremasinghe@gmail.com
Chief Executive Officer	roshan.egodage@gmail.com
Chief Operating Officer	rajivc@cclk.lk
Executive Director	geya@cclk.lk
Genius Operations	anuradha@cclk.lk
Genius Operations	senevirathne@cclk.lk
Genius Ethics	kapilawi@cclk.lk
Genius Compliance	prabanir@cclk.lk

7. Anonymous Disclosures

This policy encourages staff to put their name to any disclosure they make. Concerns expressed anonymously are less powerful and may be a challenge to investigate and hence resolve; however, they will be considered and reviewed at the discretion of the management. In exercising this discretion, the factors taken into account will include: The seriousness of the issues raised, the credibility of the concern, the likelihood of confirming the allegation from attributable sources.

Further, whistle blowers who wish to report anonymously can report through “Grievances & Suggestions” tab of the HRIS system

8. Good Faith and Untrue Allegations

If a member of staff makes a genuine allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against them. Staff must not make malicious or vexatious allegations. If staff persist in making baseless allegations against an individual or a group of individuals, disciplinary action may be taken against the individual concerned.

9. Investigation

Disclosures and allegations when received should be dealt with quickly and follow up action taken as necessary through internal or external disciplinary procedures or law enforcement agencies as applicable and a review of the operational procedures and/or risk management practices initiated, if necessary. If the details provided can be verified independently and/or supporting authentic documentary evidence to support specific concerns or allegations these will be investigated, even if the letter has been sent anonymously.

If the whistle blower identifies himself or herself by providing his or her name or contact details etc. the concerns or allegations referred to in such letters will be investigated, even if the allegations are not supported with evidence.

10. Confidentiality

The policy is intended to maintain confidentiality of any communication channeled through the procedure in order to ensure that investigations are not compromised and the identity of the whistle blower remains confidential.

In certain situations, the disclosure of the complaint and the identity of whistle-blower may be essential when evidence is needed at a disciplinary hearing, investigative hearing or in a court of law. If such a situation arises where the company is not be able to resolve the concern without revealing the employee's identity, the company is required to discuss the matter with whistle-blower prior to disclosing identity.

The company expects that the whistle blower maintains same level of confidentiality.

11. Protection of Whistle-blowers

Stringent steps are required to be taken to ensure that the employee's working environment and/or working relationship are not prejudiced by the employee's reporting a matter in good faith and that the employees will not face Retribution. Retribution includes any detriment or discrimination if and when staff reports such activities.

Similar safeguards should be exercised for non-employee whistle-blower who are customers/stakeholders of the company to ensure their fundamental rights as stakeholders are protected at all times.

12. Attempts to Prevent or Deter Allegations or Disclosures

Any attempt by an employee to deter other employees from making a disclosure or allegation, victimizing them or making life difficult for them because of the disclosure or allegation, perceived or actual will be treated as a serious disciplinary offence.

It is necessary for the employees to understand that they will be considered a party to it if they are found to be complicit in not reporting malpractices and unethical behavior upon detection.

13.Support and advise

When in doubt, the employees are encouraged to confidentially consult either their immediate superior, Confidant network, mentor network, or any superior they are comfortable with to ask for such advice.

Contact details of other parties mentioned above can be obtained from HRIS System.

End of document

*Recommended by the BAC on 24.01.2023
Approved by the BOD on 30.01.2023*