

COMMERCIAL CREDIT AND FINANCE PLC

Anti-Bribery and Corruption Policy

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1. Introduction

The purpose of this document is to strengthen integrity, foster accountability, and enhance governance transparency by proactively identifying, preventing, and eliminating bribery and corruption. This initiative is designed to align seamlessly with the company's culture and regulatory requirements. The policy has been carefully formulated in accordance with our shared values, purpose, and the applicable legal and regulatory frameworks, with the purpose of cultivating a strong compliance-culture. The company's shared values of "Integrity and Trust" are directly addressed by this policy and are deeply embedded in our principles-based culture, guiding every aspect of our operations.

An Anti-Bribery and Corruption Policy is a formal document or set of guidelines established by an organization to prevent, detect, and respond to incidents of bribery, corruption, and unethical conduct within its operations.

This policy affirms the organization's commitment to a principles-based approach, adherence to relevant laws and regulations, and sets clear expectations for employees, contractors/suppliers, and stakeholders regarding their roles in combating bribery and corruption. It typically includes definitions of key terms, outlines prohibited conduct, specifies reporting procedures, and details the consequences of any violations. Furthermore, this policy is directly linked to the company's value policy, ethical framework, and whistle blower policy.

The company upholds a strict zero-tolerance policy toward bribery and corruption, demonstrating a firm commitment to promoting integrity and trust, while ensuring compliance with anti-bribery and anti-corruption laws through the implementation of this policy.

2. Version Control

This policy will be reviewed once in every three (3) financial years or in the event of any changes in the regulatory or Environmental requirements. The updates will be recorded in the Version Control.

Version Code	Release Date	Prepared by	Approved by
1.0	xxxxx	Compliance Officer	Board of Directors

3. Responsibility

The anti-bribery and corruption policy applies to all levels and functions within Commercial Credit and Finance PLC. By encompassing these elements, the policy aims to create a unified approach to preventing bribery and corruption, safeguarding the organization's culture and legal standing across its operations.

It is relevant to:

- **Employees:** All employees including non permanent staff members , contract staff , outsourced staff members.
- **Contractors and Suppliers:** The policy may extend to contractors, suppliers, and business partners who represent or work with the organization.
- **Third Parties:** It also applies to third parties acting on behalf of the organization, ensuring they comply with anti-bribery and corruption standards.
- **Directors and Shareholders :** All directors including shareholders ensure they comply with anti-bribery and corruption standards.

4. Legal Framework

This document is prepared in accordance with the requirements of the following.

1. The CBSL direction on Corporate Governance No.05 of 2021
2. The Colombo Stock Exchange Listing Rule No.09 .
3. Anti Corruption Act No. 9 of 2023
4. Applicable CCFP Polices and procedures:
 - Ethical framework
 - Anti discrimination policy

- Value policy
- HR policy
- KBG Document
- Whistle blower policy
- Any other applicable CCFP Policies and Procedures

5. Definition of Bribery and Corruption:

5.1 Bribery

Bribery is the offering, giving, receiving, or soliciting of anything of value, directly or indirectly, to influence the actions of an individual or entity.

■ Bribery of Public Officials

No employee or representative of CCFP shall offer, promise, give, request, or accept any bribe, kickback, or inappropriate payment to or from any government official, public servant, or any individual or entity acting on behalf of a public body.

■ Commercial Bribery

CCFP prohibits the offering, giving, receiving, or soliciting of bribes or corrupt payments in the private sector, including interactions with customers, suppliers, shareholders, and business partners.

5.2 Corruption

Corruption involves the abuse of entrusted power for private gain, which may include bribery, embezzlement, fraud, or other unethical conduct.

6. Prohibited Conduct

- i. The company ensures that anti-corruption laws are not violated and ensures reputation of the company is not damaged. The company categorically prohibits the use of company funds for this purpose to make or facilitate any political contribution.
- ii. It is strictly prohibited for any staff to pay or accept bribes to obtain any improper business or other advantage. Corrupt conduct by staff is absolutely

prohibited. Staff must comply with anti-bribery and anti-corruption standards established below by this Policy.

iii. All responsible individuals must not,

- **Offering or Giving Bribes:** Individual should not offer, promise, give, or authorize bribes, kickbacks, or other improper payments to any person or entity, including government officials, in order to obtain or retain business or gain any improper advantage.
- **Receiving Bribes:** Individual should not accept, solicit, or receive bribes, kickbacks, or other improper payments from any person or entity, including customers, suppliers, or contractors. Hospitality should not be offered or accepted if it creates a situation where the giver or recipient may feel obligated to compromise business decisions.
- **Engaging in Facilitation Payments:** Individual should not make or accept facilitation payments (small payments made to expedite routine government actions) unless explicitly permitted under local laws and the organization's policies.
- **Engaging in Conflict of Interest Situations:** Individual should avoid situations where personal interests conflict or appear to conflict with the interests of the organization. This includes refraining from engaging in business transactions where there is a personal interest, financial or otherwise, that could influence their decision-making. Refer conflicts of Interest Policy.
- **Misusing Company Assets or Information:** Individual should not misuse company assets, resources, or confidential information for personal gain or to benefit others improperly.
- **Engaging in Fraudulent or Misleading Practices:** Individual should not engage in fraudulent activities, misrepresentation of financial information, or other deceptive practices that could compromise the organization's integrity.

- **Misrepresenting Expenses or Records:** Individual should not falsify expense reports, invoices, or any other records related to business transactions.
 - **Engaging in Nepotism or Favoritism:** Individual should not show favoritism or engage in nepotism in hiring, promotion, or business dealings that could compromise fairness and transparency within the organization.
 - **Making Unauthorized Commitments or Agreements:** Individual should not make unauthorized commitments or agreements on behalf of the organization that could lead to legal or financial liabilities.
 - **Ignoring or Bypassing Policies and Procedures:** Individual should not ignore or bypass established policies, procedures, or controls designed to prevent bribery and corruption.
- iv. Adequate customer due diligence procedures are in place to detect and prevent money laundering and hence everyone shall have the responsibility to reasonably prevent the company being used by customers to facilitate financial transactions involving improper payments or deposits reasonably believed to be the proceeds of bribes.
- v. Third parties associated with the company, which act for or on behalf of the company, or who perform functions in relation to or on behalf of the company are expected to have and comply with policies managing bribery and corruption risk.

8. Consequences of Violations

Violations of this policy may result in disciplinary actions, up to and including termination of employment or contractual relationships. Individuals may also be subject to civil or criminal prosecution, including fines and imprisonment. Failure to cooperate or to provide truthful information is a breach of this Policy.

9. Reporting Structure

In accordance with the company's whistle blowing policy, the responsibility for reporting any incident or attempt to offer or receive a bribe, or to engage in corrupt practices, has been entrusted primarily to staff members. Such reports are to be directed to the appropriate authorities for investigation. Additionally, employees are encouraged to utilize the company's grievance and suggestion system available via the HRIS (intranet) to anonymously report any incidents to the relevant authorities.

In the event of the identification of a significant material breach or an act of bribery and corruption within the company, the respective Board Sub-Committee will be duly informed by the Internal Audit Department, Compliance Department, and Human Resources Department.

End of the document.

Recommended by the BNGC on
Approved by the BOD on