

CODE OF ETHICS



**PEOPLE'S
LEASING**

பேபிள் லீசிங் | பிபிள்ஸ் லீசிங்

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CODE OF ETHICS

Introduction

Code of ethics policy of the company serves as the set of guidelines and principles that outlines the company's expectations for the behavior of its employees and stakeholders.

Purpose of the Policy

This policy is established to ensure strict business ethics in line with the highest international standards, is critically important for a Company due to the fact that money is the basic commodity makes finance business full of temptations. It often demands the exercise of moral judgment to fight off the lure of additional wealth. The key purpose of this policy is to mitigate any ethical dilemmas and conflicts of interest related to the nature of industry/business.

OBJECTIVES OF THE POLICY

- **Promoting Ethical Behavior:** The primary objective of this policy is to foster a culture of ethical behavior within the company. These guidelines will help employees understand what is considered acceptable and unacceptable within the organizational context, encouraging them to make ethical decisions in their day-to-day work.
- **Compliance with Laws and Regulations:** These guideline are to ensure that all employees are aware of and adhered to the relevant laws and regulations. This helps the company mitigate legal issues and maintain a good standing with regulatory bodies.
- **Protecting the Company's Reputation:** Ethical behavior contributes to a positive corporate image. A strong code of ethics helps build trust with customers, partners, and the public, protecting the company's reputation and brand.
- **Guidance for Decision-Making:** A code of ethics provides a framework for decision-making in situations where employees may encounter ethical dilemmas. It offers guidance on how to handle conflicts of interest, difficult decisions, and other ethical challenges.
- **Employee Accountability:** This policy establishes a standard of behavior to which employees can be held accountable. This policy will maintain a consistent and fair approach to evaluating employee conduct and performance.

- **Creating a Positive Workplace Culture:** A code of ethics contributes to the development of a positive workplace culture by emphasizing values such as respect, integrity, and fairness. Through this policy, it is expected to lead to increased employee morale, engagement, and loyalty.
- **Risk Management:** By addressing potential ethical risks and setting clear expectations, this policy will assist in identifying and mitigating risks that could harm the company's operations, financial stability, reputation and goodwill or relationships with stakeholders.
- **Facilitating Decision-Making in Complex Situations:** In complex and ambiguous situations, this policy serves as a reference point for the decision makers to make conformed decisions aligned with the company's values.
- **Supporting Stakeholder Interests:** This policy often extends beyond employees to include guidelines for interactions with customers, suppliers, shareholders, and other stakeholders. This policy ensures that the company considers the interests of all relevant parties.
- **Continuous Improvement:** This policy will be reviewed time to time allowing the company to adapt to changes in the business environment, industry standards, and societal expectations. This policy supports the commitment to continuous improvement in ethical practices.

What we believe

"What we believe" defines the framework and the guideline as to how the company should involve expressing the core values, principles, and ethical standards that the company expects the employees to uphold. This section of the code of ethics is often a preamble that sets the tone for the rest of the document. In addition to the company vision, mission statement and core values, general guidelines on "What we believe" are:

1. **Compliance with Laws and Regulations:** Emphasize the company's commitment to following all pertinent laws and regulations in the financial domain. We staunchly maintain rigorous adherence to both domestic and global legal structures, aiming to instill confidence and reliability among our clientele, regulatory authorities, and the wider society.
2. **Client Focus:** The Company is dedicated to prioritizing the well-being of its clients and providing fair and straightforward services. It firmly believes in placing clients' needs foremost and maintaining exceptional service standards to cultivate lasting and trustworthy relationships.
3. **Confidentiality and Privacy:** Address the importance of maintaining confidentiality and respecting the privacy of client information. The Company believes in safeguarding the confidentiality and privacy of our clients' information, recognizing the trust they place in us.
4. **Avoiding Conflicts of Interest:** Emphasize the significance of recognizing and addressing conflicts of interest to uphold impartial and equitable decision-making. Our company is committed to actively identifying and addressing conflicts of interest to uphold the integrity of our decision-making procedures.
5. **Social Responsibility:** Embrace a dedication to social responsibility and fostering a beneficial impact on the community. The organization upholds its position as a socially responsible corporate entity, actively enhancing the welfare of the communities within our operational sphere.
6. **Continuous Improvement:** Show commitment to ongoing learning, training, and elevating ethical standards. Our company strongly believes in the importance of continuous education and improvement, fostering an atmosphere where ethical behavior is fostered through educational initiatives and awareness-building endeavors.
7. **Consequences of Violations:** Explicitly outline the repercussions for infringing upon the code of ethics, underscoring the company's dedication to implementing suitable measures against individuals who fail to uphold ethical principles.
8. **Leadership Example:** Reinforce the expectation that leaders and executives within the company will set an example by adhering to the highest ethical standards.

The Code of Ethics policy will undergo periodic reviews and enhancements to align with and accommodate shifts in the business landscape and regulatory framework. Key stakeholders, such as legal and compliance teams, will actively participate in the ongoing evaluation and enhancement of this policy.

Our Vision

“To become legendary in the financial-service scene as a provider of customer-friendly, creative and innovative total solutions”

Our Mission

"Dedicated value-added customer service to accomplish organizational service excellence whilst maintaining a sustainable competitive advantage"

Our Values

Our core ethical values include economic viability, environment responsibility, and social accountability.

Our commitment towards Sri Lanka

Our Business is providing financial services. People's Leasing & Finance PLC has become a leading finance company in Sri Lanka by being the most technologically sophisticated, people-oriented business, offering cutting-edge financial solutions to the Sri Lankans, with a sound & financial management.

Our commitment for the planet

“At People’s Leasing and Finance PLC, we recognize our responsibility to contribute positively to the well-being of our planet. We are committed to conducting our business operations in an environmentally sustainable manner. This commitment extends beyond regulatory compliance, as we strive to minimize our ecological footprint and actively contribute to the conservation of natural resources”.

Key Principles

Resource Conservation: The Company and its employees will diligently work towards minimizing waste generation, promoting energy efficiency, and conserving water resources in all aspects of our operations.

Carbon Neutrality: We pledge to assess and reduce our greenhouse gas emissions, working towards carbon neutrality through the implementation of energy-efficient practices and responsible sourcing.

Sustainable Investments: In its all financial endeavors, the company will actively seek out and support environmentally sustainable projects and investments, aligning our portfolio with global efforts to address climate change and promote a green economy.

Education and Awareness: We will foster awareness and understanding of environmental issues among our employees, clients, and stakeholders. This includes providing education on sustainable practices and encouraging environmentally responsible behavior.

Continuous Improvement: The company is committed to a process of continuous improvement in its' environmental performance. Regular assessments and reviews will be conducted to identify opportunities for reducing our environmental impact and enhancing sustainability.

Collaboration: The Company will actively seek collaboration with like-minded organizations, industry partners, and communities to collectively address environmental challenges and contribute to global initiatives aimed at preserving our planet for future generations.

By incorporating these principles into our business practices, The Company aims to demonstrate our commitment to environmental sustainability and contribute positively to the health and resilience of our planet. This commitment is integral to our values and aligns with our broader mission of responsible and ethical financial stewardship.

Corporate Governance

Pride combined with a passion for excellence has forged in us a unique brand of Banking and finance. We have served our loyal customers, shareholders, partners and employers with a level of commitment that has set us apart and made us a byword in the industry. We are at all times committed to the highest standards of Corporate Governance. We have complied fully with the practices as recommended by the regulatory bodies such as the Central Bank of Sri Lanka, the Colombo Stock Exchange, the Securities and Exchange Commission of Sri Lanka and the Institute of Chartered Accountants of Sri Lanka. In furthering such standards the Board of Directors has ensured the Company conducts its business to the highest ethical standards and in the best interests of all its stakeholders.

How we work

"How we work" defines a framework and guideline as to how the company should involve in articulating the principles, values, and standards that guide employees' behavior and decision-making. The key elements to include:

1. Integrity and Honesty:

- Uphold the highest standards of integrity in all professional and business activities.
- Provide accurate and transparent information in financial reporting and communication.

2. Compliance with Laws and Regulations:

- Comply with all applicable laws, regulations, and company policies.
- Promptly report any legal or ethical concerns to the appropriate channels.

3. Conflicts of Interest:

- Disclose and manage conflicts of interest promptly and transparently.
- Avoid activities that compromise, or appear to compromise, the integrity of decision-making.

4. Confidentiality:

- Safeguard confidential information, including client data and company information.
- Use information only for legitimate business purposes and in accordance with applicable laws.

5. Professional Competence:

- Maintain and enhance professional competence and skills relevant to the financial industry.
- Encourage ongoing education and training to stay abreast of industry developments.

6. Customer Focus:

- Prioritize the interests of clients and customers.
- Provide fair and transparent services, avoiding any practices that may harm clients.

7. Social Responsibility:

- Consider the social and environmental impacts of business decisions.
- Contribute to the well-being of the community and adhere to responsible business practices.

8. Fair Dealing and Market Integrity:

- Engage in fair and ethical practices in dealings with clients, competitors, and stakeholders.
- Avoid fraudulent, deceptive, or manipulative practices that could compromise market integrity.

9. Whistleblowing and Reporting:

- Provide channels for employees to report unethical behavior or violations.
- Protect whistleblowers from retaliation and ensure confidentiality where appropriate.

10. Diversity and Inclusion:

- Promote a diverse and inclusive workplace that values and respects all individuals.
- Provide equal opportunities for professional growth and advancement.

11. Corporate Governance:

- Support and adhere to principles of good corporate governance.
- Encourage transparency, accountability, and responsible decision-making at all levels.

12. Risk Management:

- Understand and manage financial and operational risks responsibly.
- Encourage a culture of risk-awareness and compliance with risk management policies.

How we think

The '**Ask Yourself**' check, which guides the way we think and the judgments behind our decisions and actions.

The "Ask Yourself" check in this policy is a set of questions designed to encourage individuals to consider the ethical implications of their actions or decisions. These questions are included in the code of ethics to promote ethical behavior, integrity, and accountability among all employees of the company.

The specific questions may vary depending on the context and the nature of the process, but in general to guide the employees in assessing whether their actions align with the ethical principles outlined in the code of ethics. Here are some examples of questions that might be included in the "Ask Yourself" section of a code of ethics:

1. **Is it legal?** - Ensure that the action complies with all applicable laws and regulations.
2. **Is it ethical?** - Consider whether the action is consistent with the organization's ethical values and principles.
3. **How would it look in the headlines?** - Reflect on how the action would be perceived if it were to become public knowledge.
4. **Does it treat others with respect and fairness?** - Evaluate whether the action respects the rights and dignity of others and promotes fairness.
5. **Would you be proud to explain your decision to others?** - Consider whether you would be comfortable justifying your decision to colleagues, superiors, or the public.

6. **Does it align with the company's mission and values?** - Verify that the action is in line with the overall mission and values of the organization.
7. **What are the potential consequences?** - Assess the potential positive and negative consequences of the action on stakeholders and the organization.
8. **Have you considered alternative courses of action?** - Explore whether there are alternative ways to achieve the same goal that might be more ethical.
9. **Have you sought guidance or advice?** - Determine whether you have consulted with others, such as supervisors, colleagues, mentors, or steering committees for guidance.

How we behave

“How we Behave” in this policy defines a framework and guideline as to how the company should involve in establishing clear expectations and guidelines for the conduct of employees within the organization. The code of ethics serves as a framework to promote integrity, transparency, and responsible behavior. Key elements being considered in “How we behave” are:

1. Integrity and Honesty:

- Clearly state the expectation that employees must act with honesty and integrity in all their dealings.
- Prohibit fraudulent activities, misrepresentation, and dishonest practices.

2. Compliance with Laws and Regulations:

- Emphasize the importance of complying with all applicable laws and regulations governing the financial industry.
- Encourage employees to stay informed about changes in regulations and to seek guidance when uncertain.

3. Conflicts of Interest:

- Address conflicts of interest and provide guidelines on how employees should handle situations where their personal interests may conflict with the interests of the company or its clients.
- Require disclosure of potential conflicts and establish a process for managing or avoiding conflicts.

4. Client and Customer Focus:

- Stress the importance of putting clients and customers first.
- Promote fair and transparent practices in client interactions and transactions.

5. Confidentiality:

- Establish rules regarding the confidentiality of sensitive information, both internal and client-related.
- Outline procedures for handling, storing, and sharing confidential information.

6. Professionalism:

- Encourage professional conduct in all business interactions.
- Outline expectations for appropriate communication, dress, and behavior in the workplace.

7. Risk Management:

- Highlight the importance of responsible risk management practices.
- Encourage employees to identify, assess, and report risks promptly.

8. Whistleblower Protection:

- Assure employees of protection against retaliation for reporting unethical behavior or violations of the code of ethics.
- Provide a clear process for reporting concerns anonymously if needed.

9. Social Responsibility:

- Include a commitment to social responsibility and corporate citizenship.
- Encourage participation in community and environmental initiatives.

10. Continuous Learning and Development:

- Emphasize the need for ongoing education and professional development to stay abreast of industry changes and best practices.

11. Consequences for Violations:

- Clearly outline the consequences for violations of the code of ethics.
- Ensure that disciplinary measures are fair, consistent, and proportionate to the severity of the violation.

12. Regular Review and Updates:

- Commit to regularly reviewing and updating the code of ethics to ensure its relevance and effectiveness.

How we do things

"How we do things" in this policy defines a framework and guideline as to how the company should company involves articulating the principles, values, and standards that guide the conduct of employees within the organization. This section of the code typically addresses the expected behaviors, decision-making processes, and professional standards that employees should adhere to in their day-to-day activities. Here are some key elements to consider when defining "How we do things" in a financial company's code of ethics:

1. Integrity and Honesty:

- Clearly state the importance of honesty and integrity in all dealings.
- Prohibit fraudulent activities, misrepresentations, and deceptive practices.
- Emphasize the importance of accurate and transparent communication.

2. Compliance with Laws and Regulations:

- Specifies the commitment to comply with all applicable laws, regulations, and industry standards.
- Outlines procedures for staying informed about changes in regulations and ensuring compliance.

3. Conflicts of Interest:

- Defines what constitutes a conflict of interest and provide guidance on identifying and managing such conflicts.
- Requires employees to disclose any potential conflicts of interest promptly.

4. Confidentiality:

- Emphasizes the importance of maintaining the confidentiality of sensitive information.
- Specifies the types of information considered confidential and the procedures for handling it.

5. Professional Competence:

- Encourage continuous professional development and the acquisition of relevant skills.
- Establish expectations for maintaining a high level of professional competence.

6. Fair Dealing:

- Articulate the commitment to fair and honest dealings with clients, customers, and colleagues.
- Prohibit unfair, deceptive, or abusive practices.

7. Responsibility to Clients and Stakeholders:

- Clearly define the obligations to clients, shareholders, and other stakeholders.
- Promote fair treatment, transparency, and the protection of clients' interests.

8. Social Responsibility:

- Include statements about the company's commitment to social responsibility and ethical business practices.
- Consider the impact of business activities on the broader community and environment.

9. Reporting Violations:

- Provide clear mechanisms for reporting ethical violations, such as whistleblower protections and confidential reporting channels.
- Ensure that employees feel safe and supported when reporting ethical concerns.

10. Consequences for Violations:

- Clearly outline the consequences for violations of the code of ethics.
- Ensure that disciplinary measures are fair, consistent, and proportionate to the severity of the violation.

11. Review and Updates:

- Specify the process for regularly reviewing and updating the code of ethics to reflect changes in laws, regulations, and industry standards.
- Encourage feedback from employees to improve the code over time.

By addressing these elements, we create a comprehensive "How we do things" section within the code of ethics that sets clear expectations for ethical behavior within the company. Regular training and communication about the code of ethics to be carried out to ensure that employees understand and adhere to these principles.

Our Ethical Principles

Our ethical principles provide us with more detail about how our values apply in the workplace, including guidance on their application in specific situations.

Our Commitment to the Company and Ethical Principles

Our principles serve as beacons to guide our actions and decisions.

1. Doing the right thing
2. Serving our customers
3. Working together
4. Complying with occupational health and safety regulations and protecting Company's physical assets
5. Delivering value to our shareholders
6. Acting responsibly and within authority
7. Not taking part in insider dealing
8. Managing conflicts of interest
9. Rejecting bribery and corruption
10. Complying with laws, regulations and Company's standards
11. Combating financial crime
12. Speaking Up
13. Respecting our communities and the environment
14. Protecting confidential information
15. Thinking long term
16. Making value based decisions

1. Doing the right thing

Our Company's high reputation for legality and ethical values in the conduct of its business is vitally important in commercial and regulatory terms. It is one of the Company's greatest assets. All employees must:

- Comply with not just the letter but also the spirit of legal and regulatory requirements.
- Observe the highest standards of integrity and fair dealing.
- Display professional skill and care in all business activities.

These behaviors must spread throughout the Company at all levels, so that complying with them is a state of mind and is accepted as part of everyday business.

A relationship exists between law and ethics. In some instances, law and ethics overlap and what is perceived as unethical is also illegal. In other situations, they do not overlap. In some cases, what is illegal could be perceived as ethical, and in others what is perceived as unethical could be legal.

In such a situation it is best to follow the Company's ethical values and standards. The Company's reputation is so important that compliance with the letter of the law alone is not always enough.

Breaches of the law, regulations or the Company's standards are not justified by the pursuit of profit. Nor are they made acceptable by the practices of competitors or others in the market. 'Market practice' is often substituted for sharp practice. The Company rightly sets demanding performance targets. They are intended to be met by the competence or skill expected of a professional and not by cutting corners or taking short cuts with the law and regulations or by compromising the Company's reputation and standards.

We do the right thing

- We take risk seriously and manage it prudently
- We practice fairness and inclusion and exercise judgment with thought and integrity.
- The integrity of Company rests on the personal integrity of each of us.

We will always:

- Follow Our Code and the Company's policies, help colleagues comply too, and escalate where we see conduct that goes against Our Code
- Play no part in illegal activities, either inside or outside work, and avoid engaging in business that might be associated with criminal activities, bribery or corruption
- Be aware of restrictions regarding personal account dealing
- Avoid financial conflicts of interest by never making transactions for personal gain, or on behalf of friends or family
- Make sure nothing compromises our judgments, such as taking on roles outside the Company that may cause a conflict of interest, or misusing our positions to benefit ourselves or anyone else
- Take action and tell a manager when we have a potential conflict of interest, or when we see or suspect a conflict, and make sure it is managed appropriately.
- Not engage in contracts or transactions, which are in any manner considered as conflicting with the Company's interests.

Personal Interests

- Every employee must ensure that his/her personal interests do not conflict with the duties which he/she owes to the Company and which the Company owes to its customers.
- In particular, no employee should become personally involved in any transaction, negotiation or contract on behalf of the Company with an entity in which he/she or a relative has an interest, without full written disclosure to and prior written approval from the Chief Executive Officer.
- No employee should accept any employment, consultancy, directorship or partnership outside the Company without the prior written approval of the Head of Human Resources.

Financial Commitments

- No employee should enter into any contracts or transactions, which are in any manner considered as conflicting with the Company's interests. They should not in any manner and at any time subordinate Company's interests to theirs.
- Employees are totally prohibited from engaging in lending activities in their personal capacity.
- The Company also expects all employees to maintain and conduct their accounts in an acceptable manner. All employees are advised to operate their personal accounts in an exemplary manner.

Members of the Staff Operating Accounts as Attorneys

Members of staff operating accounts as attorneys are prohibited, except in respect of immediate family members. The maintenance of joint accounts other than with the spouses and children are not normally permitted, except where it is expressly authorized by the Management.

Definition:

Close family members are those family members who may be expected to influence, or be influenced by, that individual in their dealings with the entity. They may include:

- (a) the individual's spouse and children;
- (b) children of the individual's domestic partner; and
- (c) Dependents of the individual or the individual's domestic partner.

2. Serving our Customers

We are committed to providing the best possible quality of service to the Company's Customers

Our customers need to have confidence in every one of us if the Company is to be successful. Therefore, we always focus on the customers' needs and on delivering excellent service with the objective of winning their confidence and trust.

We will always:

- Ensure that customers are central to our strategy in the way we do business, treat all customers fairly and apply policies appropriately to all customers, regardless of gender, race, religion, sexual orientation and the like
- Put customers' best interests at the heart of our decision-making
- Give customers clear and appropriate information at all times
- Think about our actions from the customer's perspective when designing, selling or reviewing a product
- Deal with complaints effectively if we have failed to meet the expected standards
- Carefully record the right information to help serve customers, keep records accurately and up to date, and treat every customer's information with the appropriate confidentiality
- Make sure we never use or share confidential information for personal gain.

3. Working together

"Working together" clause in this policy emphasize the importance of collaboration, teamwork, and positive interpersonal relationships within the company. This clause implies the set expectations for employees on how they should interact with each other and promote a healthy work environment reinforcing the company's commitment to creating a positive and cooperative workplace culture, aligning the values of the employees with those of the organization.

1. Collaboration and Teamwork:

- All employees are expected to actively engage in collaborative efforts, fostering a team-oriented culture within the organization.
- Encourage open communication, the exchange of ideas, and mutual support to achieve common goals.

2. Respect, diversity and Inclusivity:

- Treat colleagues with respect, courtesy, and fairness, regardless of differences in background, opinions, or roles.

- Embrace diversity and promote inclusivity, recognizing the value of varied perspectives and experiences.

3. Conflict Resolution:

- Conflicts needs to be addressed promptly and professionally, seeking resolutions through constructive dialogue (arbitration) and mediation when necessary.
- Refrain from engaging in behavior that may escalate conflicts or create a hostile work environment.

4. Confidentiality and Trust:

- Uphold the trust placed in each team member by maintaining the confidentiality of sensitive information, both within and outside the organization.
- Avoid gossip or discussions that may undermine trust or damage professional relationships.

5. Professional Conduct:

- Conduct oneself with integrity, honesty, and professionalism in all interactions with colleagues, clients, and stakeholders.
- Support a positive work environment by avoiding disruptive or harmful behavior.

6. Continuous Improvement:

- Commit to personal and professional growth, contributing to a culture of continuous improvement within the organization.
- Provide and seek constructive feedback to enhance individual and team performance.

7. Compliance with Policies:

- Adhere to all company policies and guidelines related to teamwork, collaboration, and professional conduct.
- Report any violations or concerns promptly to the appropriate channels.

We will always:

"We will always' clause in the code of ethics policy outlines the fundamental principles and commitments that the company and its employees must adhere to. All the employees of the company are required to uphold to the highest standards of integrity, transparency, and accountability in all our practices by committing an ethical and professional conduct carrying out all business activities with honesty, fairness, and diligence, ensuring the trust and confidence of our clients, employees, and stakeholders. This enduring commitment is fundamental to our identity and is reflected in every aspect of our operations."

1. Integrity:

- We will always act with honesty and integrity in all our business dealings.
- We will always provide accurate and truthful information to clients, regulators, and stakeholders.

2. Compliance:

- We will always comply with all applicable laws, regulations, and industry standards.
- We will always strive to maintain a culture of compliance within the organization.

3. Conflicts of Interest:

- We will always identify and manage conflicts of interest in a transparent and fair manner.
- We will always prioritize the best interests of clients and avoid situations that may compromise objectivity.

4. Client Service:

- We will always prioritize the interests of our clients and strive to provide them with the highest level of service.
- We will always communicate clearly and responsibly with clients, ensuring their understanding of financial products and services.

5. Confidentiality:

- We will always protect the confidentiality of client information and other sensitive data.
- We will always use and disclose information responsibly and only for legitimate business purposes.

6. Fair Dealing:

- We will always treat all clients, colleagues, and stakeholders fairly and without discrimination.
- We will always seek to avoid any practices that could be perceived as unfair or deceptive.

7. Risk Management:

- We will always engage in responsible risk management practices to protect the interests of the company and its stakeholders.
- We will always disclose relevant risks to clients and ensure they have a clear understanding of potential outcomes.

8. Professionalism:

- We will always uphold high professional standards in our conduct and interactions.
- We will always seek to enhance our professional competence through ongoing education and training.

9. Social Responsibility:

- We will always consider the broader social and environmental impact of our business activities.
- We will always strive to contribute positively to the communities in which we operate.

10. Reporting Violations:

- We will always encourage the reporting of any unethical behavior or violations of the code of ethics.
- We will always investigate and address reported violations promptly and fairly.

4. Complying with occupational health and safety regulations and Protecting Company's physical assets

The Occupational Health and Safety clause is incorporated in the policy document to ensure the compliance with occupational health and safety regulations and Protecting Company's physical assets.

This section addresses three (03 sections).

1. Occupational Health & Safety Compliance
2. Protection of Company's Physical Assets
3. Compliance Monitoring and Enforcement

Section 1: Occupational Health and Safety Compliance

1.1 Commitment to Employee Well-being:

The company is committed to providing a safe and healthy working environment for all employees. All personnel are expected to adhere to occupational health and safety regulations and guidelines to ensure their well-being.

1.2 Compliance with Regulations:

Employees must familiarize themselves with and adhere to all applicable occupational health and safety laws and regulations. This includes but is not limited to, maintaining a clean and hazard-free workspace, using safety equipment as required, and reporting any unsafe conditions promptly.

1.3 Reporting Incidents:

Employees are encouraged to promptly report any accidents, injuries, or potential hazards to their supervisors or the designated safety officer. Timely reporting is essential for the prevention of further incidents and ensuring a swift response.

Section 2: Protection of Company's Physical Assets

2.1 Asset Responsibility:

All employees are responsible for protecting the company's physical assets, including but not limited to, equipment, facilities, and proprietary information. Employees should use these assets responsibly and efficiently in the course of their duties.

2.2 Security Measures:

Employees must adhere to security measures in place to protect physical assets. This includes maintaining the confidentiality of access codes, passwords, and other security-related information. Any breach of security must be reported immediately.

2.3 Preventing Loss and Damage:

Employees should take proactive measures to prevent loss or damage to company property. This includes using equipment and resources responsibly, securing valuables, and reporting any suspicious activity that may pose a threat to physical assets.

Section 3: Compliance Monitoring and Enforcement

3.1 Monitoring and Evaluation:

The company will regularly monitor and evaluate compliance with occupational health and safety regulations and asset protection measures. This may include internal audits, inspections, and employee training programs.

3.2 Disciplinary Actions:

Failure to comply with occupational health and safety regulations or negligence in protecting company assets may result in disciplinary actions, up to and including termination of employment. Disciplinary measures will be applied consistently and fairly.

5. Delivering value to our shareholders

"Delivering value to our shareholders" clause in this policy reflects the commitment of the company to act in the best interests of its shareholders while maintaining ethical standards. This clause covers various aspects to ensure transparency, accountability, and responsible business practices.

The key aspects of this policy are:

1. Transparency and Full Disclosure:

- Requirement for accurate and timely financial reporting.
- Disclosure of material information that may impact shareholder value.

2. Conflicts of Interest:

- Guidelines on identifying and managing conflicts of interest that could compromise shareholder interests.
- Procedures for disclosing potential conflicts of interest and obtaining necessary approvals.

3. Fair and Ethical Practices:

- Commitment to fair and ethical business practices in dealings with clients, suppliers, and other stakeholders.
- Avoidance of fraudulent activities and unethical behavior that could harm shareholders.

4. **Compliance with Laws and Regulations:**
 - Adherence to all applicable laws and regulations governing financial markets, ensuring compliance to protect shareholder value.
5. **Risk Management:**
 - Implementation of effective risk management strategies to protect shareholder investments.
 - Clear communication of the company's risk profile and mitigation measures.
6. **Long-Term Value Creation:**
 - Emphasis on strategies that contribute to the sustainable, long-term growth of the company and shareholder value.
 - Avoidance of short-term practices that may be detrimental to long-term interests.
7. **Stewardship and Governance:**
 - Commitment to sound corporate governance principles.
 - Ensuring that the board and management act in the best interests of shareholders.
8. **Shareholder Engagement:**
 - Encouragement of shareholder engagement and communication.
 - Acknowledgment of the importance of listening to and considering shareholder perspectives.
9. **Dividend Policies:**
 - Guidelines on dividend distributions and other forms of returns to shareholders.
 - Consideration of the company's financial health in determining dividend payments.
10. **Ethical Investment:**
 - Consideration of environmental, social, and governance (ESG) factors in investment decisions.
 - A commitment to responsible and sustainable investing practices.

6. Acting responsibly and within authority

The "Acting responsibly and within authority" clause in this policy addresses the key aspects to ensure that employees adhere to ethical standards and conduct themselves appropriately within the scope of their responsibilities. These aspects are addressed to protect the interests of clients, maintain the company's reputation, and contribute to the overall stability and trustworthiness of the financial industry. The aspects being addressed are:

1. Integrity and Honesty:

- Employees are expected to act with integrity and honesty in all their dealings within the company and with external stakeholders.

2. Compliance with Laws and Regulations:

- Adherence to local and international laws, as well as industry regulations, is crucial. Employees should conduct their activities in compliance with these legal and regulatory frameworks.

3. Conflicts of Interest:

- Employees should avoid situations where personal interests conflict with the interests of the company or its clients. Full disclosure of potential conflicts is often required.

4. Use of Authority:

- Employees are expected to use their authority responsibly and in the best interests of the company. Abusing authority for personal gain or to the detriment of others is prohibited.

5. Confidentiality:

- Maintaining the confidentiality of sensitive information, both internal and client-related, is a fundamental expectation. Unauthorized disclosure of information can lead to severe consequences of disciplinary actions.

6. Professional Competence:

- Employees are expected to maintain and enhance their professional competence through ongoing learning and development initiatives, ensuring they are well-equipped to fulfill their roles.

7. Fair Dealing:

- Fair and honest treatment of clients, colleagues, and other stakeholders is emphasized. Unfair or deceptive practices are strictly prohibited.

8. Social Responsibility:

- Encouraging employees to consider the social and environmental impacts of their decisions and actions is becoming increasingly common in codes of ethics.

9. **Risk Management:**

- Employees should be aware of and manage the risks associated with their activities. This includes proper risk assessment, reporting, and mitigation.

10. **Whistleblower Protection:**

- Providing assurance that employees who report unethical behavior or violations of the code will be protected from retaliation.

11. **Professionalism:**

- Maintaining a high level of professionalism in all interactions, both within the company and with external parties.

12. **Consequences for Violations:**

- Clearly outlining the consequences for violating the code of ethics, which may include disciplinary actions, termination, and legal consequences.

7. Not taking part in Insider Dealing

The "Not taking part in Insider Dealing" clause in this policy covers the key aspects related to preventing and addressing insider trading, which is the illegal practice of trading on the stock exchange to one's own advantage through having access to confidential information.

Definition of Insider Dealing:

"Insider trading" refers generally to buying or selling a security, in breach of a fiduciary duty or other relationship of trust and confidence, while in possession of material, nonpublic information about the security.

This refers that in anyway employees shall not deal, or advise or arrange for anyone else to deal, in any shares or other securities listed or traded on a recognized Stock Exchange, if an employee has access to information which he/ she knows or have reason to believe is non-public price sensitive information relating to those securities or the company concerned. This applies whether one has received information through his/her work or from any other source.

The misuse of inside information undermines the financial system and unfairly disadvantages others in the market.

Clearly defining what constitutes insider dealing within the context of the company's operations and the legal framework in Sri Lanka. This may include buying or selling securities based on material non-public information.

1. **Prohibition of Insider Dealing:** Explicitly stating that employees, executives, and any other individuals affiliated with the finance company are prohibited from engaging in insider dealing activities.
2. **Communication of Material Information:** Outlining procedures and guidelines for the proper communication of material information, ensuring that it is disseminated to the public in a fair and timely manner.
3. **Blackout Periods:** Establishing blackout periods during which employees are restricted from trading in the company's securities. These blackout periods typically precede major corporate events or financial disclosures.
4. **Pre-Clearance Procedures:** Requiring employees to obtain pre-clearance from a designated compliance officer or department before trading in the company's securities, especially during sensitive periods.

5. **Monitoring and Surveillance:** Implementing monitoring and surveillance mechanisms to detect and prevent potential instances of insider dealing. This may involve the use of technology and data analytics.
6. **Consequences of Violations:** Clearly outlining the disciplinary actions and legal consequences that individuals may face if found guilty of insider dealing. This may include termination of employment, legal action, fines, and other penalties.
7. **Training and Education:** Providing training programs to educate employees about the importance of avoiding insider dealing, the legal implications, and the company's policies and procedures.
8. **Whistleblower Protections:** Establishing a mechanism for employees to report suspected instances of insider dealing without fear of retaliation. This encourages a culture of compliance and transparency.
9. **Regulatory Compliance:** Ensuring that the company's policies align with the relevant laws and regulations governing insider trading in Sri Lanka.
10. **Regular Review and Updates:** Committing to periodic reviews of the policy to ensure its effectiveness and relevance in light of changes in the regulatory environment or the company's operations.

No employee should engage in insider dealing in securities.

This means that employees will not deal, or advise or arrange for anyone else to deal, in any shares or other securities listed or traded on a recognized Stock Exchange, if an employee has accept information which he/ she knows or have reason to believe is non-public price sensitive information relating to those securities or the company concerned. This applies whether one has received information through his/her work or from any other source.

The misuse of inside information undermines the financial system and unfairly disadvantages others in the market.

We will always:

- Not engage in insider dealing
- Not provide price sensitive information to any party
- Engage in share transactions pertaining to companies within the Company's group during period stipulated by the Stock Exchange as non- sensitive as per Share Trading Policy of the Company
- Observe all the internal rules on personal trading in securities which the Company and subsidiary/ Associate companies put in place and which apply to employees.

8. Managing conflicts of interest

Clause of Managing conflicts of interest is established in this policy is to ensure maintaining the integrity and ethical standards of the company. This comprehensive will enable employees in identifying, preventing, and addressing conflicts of interest.

1. Disclosure and Transparency:

- **Policy Statement:** This policy clearly articulate the company's commitment to transparency and the disclosure of potential conflicts of interest.
- **Reporting Mechanisms:** Employees can confidentially report potential conflicts of interest, ensuring protection against retaliation.

2. Identification of Conflicts:

- **Training Programs:** The Company will conduct training sessions to educate employees about different scenarios that may constitute conflicts of interest.
- **Conflict of Interest Register:** The Company will maintain a register where employees can disclose any personal, financial, or professional interests that may conflict with their duties.

3. Recusal and Decision-Making:

- **Recusal Guidelines:** It is required for the employees to recuse themselves from decision-making processes where a conflict of interest exists.
- **Independent Committees:** where necessary an independent committee will be appointed to review and make decisions on matters where conflicts arise.

4. Gifts and Entertainment:

- All the employees of the company should be strictly adhered to the "ACCEPTANCE OF GIFT & ENTERTAINMENT POLICY" of the company.

6. Post-Employment Restrictions:

- **Non-Compete Clauses:** Including non-compete clauses in employment contracts to prevent former employees from engaging in activities that may create conflicts of interest.
- **Cooling-Off Periods:** Implementing cooling-off periods during which former employees are restricted from engaging in certain activities.

7. Regular Review and Updates:

- **Periodic Audits:** Conduct regular audits of the company's practices to identify and address potential conflicts.
- **Policy Updates:** Ensure that the code of ethics is periodically reviewed and updated to reflect changes in the regulatory environment and business practices.

8. Legal Compliance:

- **Adherence to Regulations:** Ensure that the company's policies align with the legal and regulatory framework governing finance companies in Sri Lanka.
- **Legal Consultation:** Seek legal advice to ensure compliance with applicable laws and regulations.

9. Consequences for Violations:

- **Disciplinary Measures:** Clearly outline the consequences of violating conflict of interest policies, including disciplinary measures such as warnings, suspensions, or termination.

10. Board Oversight:

- **Board Involvement:** Involve the board of directors in overseeing the implementation and effectiveness of conflict of interest policies.
- **Ethics Committee:** The Board may decide to appoint an ethics committee within the board to specifically address ethical concerns.

In the course of business, a conflict of interest may arise between a Company Branch or a Business Unit and its customer, or between customers or prospective customers. Company Branches or Business Units must try to identify potential conflicts of interest and try to avoid them. If a conflict of interest unavoidably occurs, the paramount consideration is to ensure fair treatment of the customers concerned. This may be done by disclosure of the conflict to the customers, internal rules of confidentiality ("Chinese Walls"), declining to act, or other measures. The Company Branch or a Business Unit must not unfairly place their interest above those of their customers.

It is important for employees not to put him/herself in a position where his/her judgment could be affected. An employee is responsible for identifying, assessing and managing conflicts of interest (whether actual or issues which could be viewed as conflicts) that arise in daily working life.

We will always:

- Avoid both actual and perceived conflicts of interest
- Avoid placing ourselves in positions in which personal interests conflict with our duties to the Company.
- Disclose personal or family interests that could influence business dealings within or with the Company
- Be aware of the potential for, and actively manage, conflicts of interest between different areas or customers of the Company, or the Company and its customers.

9. Rejecting Bribery and Corruption

The company is committed to the highest standards of integrity, transparency, and ethical conduct. We unequivocally reject all forms of bribery and corruption and are dedicated to fostering an environment that upholds the principles of fairness, honesty, and accountability.

1. Prohibition of Bribery and Corruption

- a. Employees of the company are strictly prohibited from offering, giving, receiving, or soliciting any form of bribe, kickback, or improper payment, whether directly or indirectly.
- b. Engaging in corrupt practices, including but not limited to bribery, extortion, embezzlement, and money laundering, is strictly forbidden.

2. Gifts and Entertainment

- a. Employees must exercise caution when giving or receiving gifts, favors, or entertainment. All such transactions must be reasonable, transparent, and compliant with applicable laws and regulations.
- b. Gifts of more than nominal value, lavish entertainment, or any other form of undue influence are strictly prohibited.
- c. Since this clause is governed by the company 'Acceptance of Gift and Entertainment Policy', all the employees of the company should always refer to the company 'Acceptance of Gift and Entertainment Policy'

3. Facilitation Payments

- a. Facilitation payments, often referred to as "grease payments," are strictly prohibited. No employee shall make or authorize such payments on behalf of the company.

4. Reporting and Whistleblowing

- a. Employees are encouraged to report any suspected or observed instances of bribery or corruption promptly. The Company ensures the confidentiality and protection of whistleblowers.

5. Compliance with Laws and Regulations

- a. Employees must familiarize themselves with and adhere to all relevant anti-bribery and corruption laws and regulations, including the laws of Sri Lanka.

6. Consequences of Non-Compliance

- a. Violations of this policy may result in disciplinary action, including termination of employment, and may also lead to legal proceedings.

7. Training and Awareness

a. Regular training programs will be conducted to ensure that all employees are aware of their responsibilities and the consequences of engaging in bribery and corruption.

By adhering to these principles, the company and its employees affirm the commitment to ethical conduct and contribute to the building of a trustworthy and sustainable financial industry in Sri Lanka.

Collection of Funds

The staff should refrain from collecting funds, soliciting sponsorships or any benefits either from customers or the general public, for various activities of staff welfare including outings and trips. Collection of funds, of any nature from the staff is also prohibited unless prior approval is obtained from Head of Human Resources.

If the collection of funds approved by the management,

The company recognizes the importance of handling funds with utmost integrity, transparency, and in compliance with all applicable laws and regulations. This "Collection of Funds" clause is designed to set ethical standards for the collection of funds by employees and stakeholders of the Company.

Guidelines:

1. **Legal Compliance:** All funds collected by the Company shall be in strict compliance with the laws and regulations of Sri Lanka governing financial transactions, including but not limited to the applicable acts and regulations.
2. **Transparency and Accuracy:** All financial transactions related to fund collection shall be accurately recorded in the Company's financial records. Employees involved in the collection process must maintain transparency and provide accurate information to stakeholders.
3. **Ethical Practices:** Employees involved in the collection of funds shall adhere to the highest ethical standards. They shall not engage in any form of bribery, corruption, or unethical practices that could compromise the integrity of fund collection processes.
4. **Conflicts of Interest:** Employees must promptly disclose any conflicts of interest that may arise during the collection of funds. They should avoid situations where personal interests may conflict with the best interests of the Company or its stakeholders.
5. **Customer Information Protection:** The Company is committed to protecting the confidentiality of customer information. Employees involved in fund collection must handle customer data responsibly, ensuring that it is not misused, disclosed, or accessed without proper authorization.

6. **Audit and Review:** The Company shall conduct regular audits and reviews of fund collection processes to ensure compliance with this policy. Any discrepancies or violations discovered shall be addressed promptly and appropriate corrective actions taken.
7. **Reporting Violations:** Employees who become aware of any violations of this "Collection of Funds" clause are obligated to report such violations to the [designated authority or department]. The Company ensures protection for whistleblowers and prohibits retaliation against individuals reporting in good faith.
8. **Review and Amendment:** This policy shall be reviewed periodically to ensure its effectiveness and relevance. The Company reserves the right to amend or update this "Collection of Funds" clause as necessary.

10. Complying with Laws, Regulations and Company's Policies

The company is committed to conduct business operations with the highest standards of ethics, integrity, and in full compliance with the laws, regulations, and policies that govern our industry. This commitment is essential to maintaining the trust and confidence of our clients, employees, and stakeholders. As a finance company operating in Sri Lanka, we recognize the significance of adhering to the legal and regulatory framework established by the relevant authorities.

Employees at all levels are expected to familiarize themselves with and adhere to applicable laws, regulations, and the company's policies that govern our business activities. This includes, but is not limited to, financial regulations, data protection laws, anti-money laundering laws, and any other relevant statutes that impact our operations.

Key Points:

1. **Legal Compliance:** All employees must comply with local and international laws applicable to our business. Failure to comply with these laws may result in legal consequences for both the individual and the company.
2. **Regulatory Adherence:** We are committed to meeting the requirements set forth by regulatory bodies in the finance industry in Sri Lanka. Employees must stay informed about changes in regulations and promptly adapt their practices to ensure ongoing compliance.
3. **Company Policies:** In addition to legal and regulatory requirements, employees are expected to adhere to the company's internal policies and procedures. These policies are designed to align with legal and ethical standards, and deviation from them may lead to disciplinary action.
4. **Reporting Non-Compliance:** If an employee becomes aware of any potential violations of laws, regulations, or company policies, they are encouraged to report such concerns through the established reporting channels without fear of retaliation.
5. **Training and Awareness:** The Company will provide regular training and updates to ensure that employees are aware of their legal and ethical obligations. It is the responsibility of each employee to participate actively in such training sessions.

Non-compliance with laws, regulations, or company policies may lead to disciplinary action, up to and including termination of employment. We believe that a strong commitment to compliance is essential for the success and sustainability of our business, and we appreciate the dedication of each employee in upholding these principles.

The company is committed to fostering a culture of integrity, transparency, and accountability, and we rely on the collective efforts of our employees to maintain the highest standards of conduct in all aspects of our operations.

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Be open and co-operate with regulators and auditors

Open and Co-operation with Regulators and Auditors: In our commitment to upholding the highest standards of integrity and transparency, all employees are expected to be open and cooperative with regulators and auditors. This extends to regulatory bodies and external auditors involved in overseeing and examining our financial activities.

Employees must adhere to the following guidelines:

1. Prompt Response to Requests:

- Respond promptly and truthfully to any requests or inquiries from regulators and auditors. Ensure that all required information is provided accurately and within the specified timeframe.

2. Accessibility of Records:

- Maintain organized and accessible records to facilitate the audit process. Cooperate fully in providing access to all relevant documentation and data as requested by regulatory authorities or auditors.

3. Honesty and Transparency:

- Conduct all interactions with regulators and auditors with honesty and transparency. Disclose any information that may impact the assessment of our financial activities or compliance with regulatory requirements.

4. Designated Contact Person:

- Designate specific individuals within the organization as points of contact for regulators and auditors. These individuals will serve as liaisons to facilitate communication and information exchange.

5. Assistance and Collaboration:

- Collaborate with regulators and auditors during on-site visits or inspections. Offer assistance and support to ensure a smooth and efficient audit process, demonstrating a commitment to regulatory compliance.

6. Adherence to Regulatory Changes:

- Stay informed about changes in regulatory requirements relevant to our industry. Proactively adjust internal processes and practices to align with new regulations, and inform regulators of any changes that may impact our compliance.

7. Confidentiality and Data Security:

- Maintain the confidentiality and security of sensitive information during interactions with regulators and auditors. Only disclose information that is necessary for the purpose of the audit or regulatory inquiry.

8. Training and Awareness:

- Participate in training programs to enhance awareness of regulatory compliance and the importance of cooperation with auditors. Stay informed about best practices and industry standards in financial regulation.

9. Non-Retaliation Policy:

- Uphold a non-retaliation policy, ensuring that employees feel secure in reporting any concerns related to regulatory compliance without fear of reprisal.

By adhering to these guidelines, we reinforce our commitment to regulatory compliance and ethical business practices, contributing to the overall success and reputation of our company in the financial industry of Sri Lanka."

11. Combating Financial Crime

It is critically important to protect the worldwide financial system. You must comply with laws, regulations and Company's standards on anti-money laundering, preventing financing for terrorism, fraud or sanctions.

Introduction

The company is committed to maintaining the highest standards of ethical conduct and integrity in all its operations. As a financial institution operating in Sri Lanka, we recognize the importance of combating financial crime to safeguard the interests of our clients, stakeholders, and the broader community. This clause outlines The Company's policies and procedures to prevent, detect, and respond to financial crime.

- **Compliance with Applicable Laws and Regulations:** Employees of the company are expected to comply with all applicable laws and regulations related to financial crime, including but not limited to those governing money laundering, fraud, corruption, and terrorist financing. Failure to comply with these laws may result in disciplinary action, including termination of employment.
- **Reporting Suspected Financial Crime:** Employees are required to promptly report any suspected or observed instances of financial crime to the designated compliance officer or the relevant authorities as per the established reporting procedures. The confidentiality of those reporting in good faith will be protected, and there will be no retaliation against employees reporting such concerns.
- **Anti-Money Laundering (AML) and Know Your Customer (KYC) Procedures:** To prevent money laundering and ensure the integrity of our business relationships, has implemented robust AML and KYC procedures. Employees must adhere to these procedures when onboarding new clients or conducting transactions, and any deviations must be reported immediately. Also, these procedures are made available in the intranet to be viewed by all employees.
- **Training and Awareness:** The Company will provide regular training to employees to enhance their awareness of the risks associated with financial crime and to update them on relevant laws, regulations, and internal policies. Employees are expected to actively participate in and apply the knowledge gained through these training programs.
- **Collaboration with Authorities:** In the event of suspected financial crime, the company will collaborate with relevant authorities to investigate and address the issue. Employees are expected to cooperate fully with such investigations.

- **Disciplinary Action:** Any employee found to be involved in financial crime, including but not limited to money laundering, fraud, corruption, or terrorist financing, will be subject to disciplinary action, up to and including termination of employment. The company reserves the right to pursue legal action against individuals involved in such activities.
- **Review and Update:** This policy will be periodically reviewed and updated to ensure its effectiveness and compliance with changing laws and regulations.

The Company fully supports the international drive against serious crime, especially drug trafficking and is committed to assisting the authorities to identify money laundering transactions and, where appropriate, to confiscate the proceeds of crime. Every employee must make sure that he/she is familiar with any obligation imposed by the laws of the country. The key principles include the following:

We have an obligation to seek advice or report unethical conduct or criminal activity, or suspicion thereof, including theft, fraud, corruption or intimidation. Whistle-blowers should be protected from victimization.

12. Speaking Up

At the company, we recognize the importance of maintaining a workplace culture that encourages open communication, transparency, and integrity. We believe that every employee plays a crucial role in contributing to the success of our organization, and their insights, concerns, and feedback are invaluable. In line with this commitment, we have established the "Speaking Up" clause in our HR policy to foster a culture where employees feel empowered to voice their opinions, report concerns, and contribute to a healthy work environment.

- **Open Communication Channels:** We encourage all employees to communicate openly and honestly with their supervisors, managers, and colleagues. Transparent communication is vital for the success of our organization and the well-being of our employees.
- **Whistleblower Protection:** The Company is committed to protecting employees who speak up in good faith about any unethical, illegal, or improper conduct. We strictly prohibit retaliation against employees who report such concerns, and we ensure confidentiality to the extent permitted by law.
- **Anonymous Reporting Mechanism:** To facilitate open communication, we provide a confidential and anonymous reporting mechanism. Employees can report concerns without fear of retribution, and every effort will be made to maintain the anonymity of the whistleblower, unless disclosure is required by law.
- **Non-Retaliation Policy:** The Company strictly prohibits retaliation against employees who raise concerns, report violations, or participate in investigations. Retaliation in any form, including but not limited to termination, demotion, harassment, or any adverse employment action, will not be tolerated.
- **Prompt Investigation and Resolution:** All reports of unethical, illegal, or improper conduct will be promptly and thoroughly investigated. The company is committed to taking appropriate corrective action to address any substantiated concerns and prevent future occurrences.
- **Education and Awareness:** We provide training and awareness programs to educate employees about the importance of speaking up, the process for reporting concerns, and the company's commitment to maintaining a workplace free from retaliation.
- **Senior Leadership Support:** The senior leadership team at the company is committed to fostering a culture of openness and accountability. They encourage employees at all levels to actively participate in creating a work environment built on trust and integrity.

By embracing the "Speaking Up" clause in our HR policy, we aim to create a workplace where employees feel secure in expressing their views, contributing to a positive and ethical organizational culture. This commitment aligns with our values and reinforces our dedication to the highest standards of business conduct and professionalism.

Whistle Blower

Purpose:

The Company recognizes the importance of maintaining the highest standards of ethical conduct and accountability. This Whistleblower Protection Policy is established to encourage employees to report any unlawful or unethical behavior, financial misconduct, or violation of company policies.

- **Reporting Mechanism:** Employees are encouraged to report concerns or suspicions regarding any unethical or illegal activities within the company. Reports can be made to the higher authorities, [Designated Officer/Whistleblower Hotline/Email Address], ensuring confidentiality and anonymity if desired.
- **Protection Against Retaliation:** The company is committed to protecting whistleblowers from any form of retaliation or adverse actions as a result of their reporting. Retaliation against any employee who, in good faith, reports a concern or cooperates in an investigation is strictly prohibited and will result in disciplinary action, up to and including termination.
- **Confidentiality:** All reports and investigations will be treated with the utmost confidentiality to the extent permitted by law. Information will only be disclosed to those individuals who need to know to conduct a thorough investigation and address the reported concern.
- **Non-Disclosure of Whistleblower's Identity:** If an employee wishes to remain anonymous, every effort will be made to protect their identity during the investigation process. However, the effectiveness of the investigation may be limited in such cases.
- **False Reporting:** Any employee found to have knowingly made false accusations or provided misleading information will be subject to disciplinary action, up to and including termination.
- **No Retaliation for Good Faith Reporting:** Employees who make reports in good faith will be protected against any adverse employment actions. The company is committed to fostering an environment where individuals feel secure in reporting concerns without fear of reprisal.

- **Communication and Awareness:** The Company will communicate and educate employees about the Whistleblower Protection Policy regularly. Training programs will be conducted to ensure that all employees understand their rights and responsibilities under this policy.
- **Investigation Process:** All reported concerns will be promptly and thoroughly investigated. The investigation process will be fair, unbiased, and conducted by individuals with appropriate expertise.
- **Review and Revision:** This policy will be reviewed periodically to ensure its effectiveness and compliance with applicable laws and regulations. Necessary revisions will be made to address any identified shortcomings.
- **Contact Information:** For any questions or concerns related to this policy, employees may contact the Human Resources Department.

By adhering to this Whistleblower Protection Policy, The Company aims to foster a culture of integrity, transparency, and accountability.

13. Respecting our communities and the environment

At The Company, we recognize the integral role we play in the communities where we operate and the broader environment that sustains us. Our commitment to social responsibility extends beyond financial success to encompass the well-being of the communities we serve and the environment we inhabit. To uphold these principles, we integrate the following clause into our HR policy:

- **Community Engagement:** We encourage our employees to actively participate in community initiatives and charitable activities. This engagement not only contributes to the betterment of society but also strengthens the bond between our company and the communities we operate in.
- **Cultural Sensitivity:** We respect and celebrate the diverse cultures and traditions of the communities we engage with. Our employees are expected to be culturally sensitive, fostering an inclusive environment that values differences and promotes understanding.
- **Environmental Stewardship:** The Company is committed to minimizing its environmental impact. We strive to adopt sustainable practices in our daily operations and encourage employees to contribute to our efforts. This includes reducing waste, conserving resources, and adopting eco-friendly practices.

- **Ethical Business Practices:** We conduct our business with integrity and transparency, ensuring that our operations align with ethical standards. This commitment extends to our relationships with local communities, emphasizing fair and responsible business practices.
- **Supporting Local Economies:** We actively seek opportunities to support local businesses and suppliers. By fostering partnerships with local enterprises, we aim to contribute to the economic growth and prosperity of the communities in which we operate.
- **Employee Volunteering Programs:** The Company encourages employees to volunteer their time and skills for community projects. Through these programs, we aim to make a positive impact on society while providing our employees with opportunities for personal growth and development.
- **Environmental Education and Awareness:** We are committed to raising awareness among our employees about environmental issues and promoting eco-friendly practices. By fostering a culture of environmental responsibility, we aim to contribute to a sustainable future.
- **Compliance with Local Laws and Regulations:** The Company is dedicated to complying with all relevant local laws and regulations pertaining to community and environmental matters. We strive to go beyond mere compliance, actively seeking ways to exceed regulatory requirements for the benefit of our communities and the environment.

By embodying these principles, we believe that the company can be a positive force for good, creating lasting value for our communities and contributing to the well-being of the environment. Through the collective efforts of our employees, we aspire to leave a positive and enduring legacy.

14. Protecting confidential information

As an integral part of our commitment to maintaining the highest standards of integrity and safeguarding the interests of our clients, employees, and the company as a whole, all employees of the company are required to adhere to the strict guidelines outlined in this "Protecting Confidential Information" clause.

- **Definition of Confidential Information:** Confidential information includes, but is not limited to, client records, financial data, business strategies, proprietary software, employee records, and any other information that is not publicly available. This extends to information related to clients, employees, partners, and the company itself.
- **Responsibility of Employees:** All employees are responsible for maintaining the confidentiality of information entrusted to them during the course of their employment. This responsibility extends

beyond the duration of employment and remains in effect even after an employee has left the company.

- **Restricted Access:** Access to confidential information is restricted to employees on a need-to-know basis. Unauthorized access to, or dissemination of, confidential information is strictly prohibited.
- **Security Measures:** Employees must adhere to all security measures implemented by the company to protect confidential information. This includes, but is not limited to, password protection, secure document storage, and encryption protocols.
- **Non-Disclosure Agreements:** Employees may be required to sign non-disclosure agreements (NDAs) as a condition of their employment, particularly if their role involves exposure to sensitive information. Violation of such agreements may result in disciplinary action, including termination and legal consequences.
- **Training and Awareness:** The Company will provide training and awareness programs to ensure that employees understand the importance of maintaining confidentiality. Regular updates on security protocols and best practices will be communicated to all employees.
- **Reporting Breaches:** Employees are obligated to report any suspected or actual breaches of confidentiality immediately to their supervisor, the HR department, or through established reporting channels. Failure to report breaches may result in disciplinary action.
- **Consequences of Violations:** Violations of this policy will be taken seriously and may result in disciplinary action, up to and including termination of employment. Legal action may also be pursued if a breach of confidentiality causes harm to the company, clients, or any other party involved.

By adhering to this "Protecting Confidential Information" clause, employees contribute to the maintenance of a secure and trustworthy environment for our clients and the sustained success of The Company.

Clear Desk Policy

Purpose:

The Clear Desk Policy is implemented to ensure a secure, organized, and confidential work environment within the Company as a leading finance company in Sri Lanka. This policy aims to protect sensitive information, maintain professional standards, and enhance the overall security posture of the organization.

Policy Guidelines:

- **Confidentiality and Security:** Employees are required to clear their desks at the end of each working day. This includes removing all physical documents, sensitive information, and personal belongings from the work area. Confidential documents must be securely stored in designated cabinets or drawers.
- **Data Protection:** All electronic devices, including computers, laptops, and other peripherals, must be logged off, shut down, or securely locked when not in use. Employees should follow password protection guidelines to safeguard access to sensitive data.
- **Document Management:** Physical documents containing sensitive or confidential information must be properly filed and stored in designated areas. Misplacement or loss of such documents may result in disciplinary action.
- **Personal Items:** Personal items such as bags, purses, and belongings should be stored in designated areas and not left unattended on desks. This helps maintain a professional and organized workspace.
- **Clean Desk Culture:** The Clean Desk Policy promotes a clean and organized workspace, fostering a positive work environment. Employees are encouraged to de-clutter their desks, enhancing efficiency and creating a visually appealing workspace.
- **Visitor and Client Interaction:** In the presence of visitors or clients, employees should adhere to the Clean Desk Policy to project a professional image. Confidential or sensitive information should not be visible or accessible during such interactions.
- **Compliance and Consequences:** Non-compliance with the Clear Desk Policy may result in disciplinary action, as outlined in the company's disciplinary procedures. This includes verbal warnings, written warnings, and, in severe cases, termination of employment.
- **Regular Audits:** The Company reserves the right to conduct regular audits to ensure compliance with the Clear Desk Policy. Employees are expected to cooperate fully during such audits and address any corrective actions identified.

By adhering to the Clear Desk Policy, employees contribute to the overall security and professionalism of The Company, reinforcing our commitment to excellence in the financial industry.

15. Thinking long term

At The Company, we recognize the importance of strategic planning and sustainable growth. As a financial institution operating in Sri Lanka, we understand the dynamic nature of the industry and the significance of fostering a culture that embraces forward-thinking practices. In line with our commitment to excellence and longevity, we have incorporated the "Thinking Long Term" clause into our HR policy.

- **Strategic Alignment:** Employees are encouraged to align their goals and actions with the long-term vision and objectives of the company. This involves considering the impact of decisions on the overall financial health and sustainability of the organization.
- **Continuous Learning and Development:** In order to thrive in the rapidly evolving financial landscape, employees are expected to engage in continuous learning and development. The company will provide resources and opportunities for training and skill enhancement to ensure that employees are equipped to contribute effectively in the long run.
- **Succession Planning:** Recognizing that long-term success is contingent on effective talent management, the company is committed to developing a robust succession planning system. This includes identifying and nurturing talent within the organization to ensure a seamless transition of key roles over time.
- **Ethical Practices:** Upholding ethical standards is integral to sustained success. Employees are expected to adhere to the highest ethical standards in their conduct, decision-making, and interactions, contributing to the company's long-term reputation and credibility in the financial market.
- **Risk Management:** Considering the inherent risks associated with the financial sector, employees are expected to be vigilant in identifying and mitigating potential risks that may impact the company in the long term. This includes compliance with regulatory requirements and the implementation of prudent risk management practices.
- **Employee Well-being:** The well-being of our employees is paramount to our long-term success. The company is committed to providing a conducive work environment, promoting work-life balance, and offering employee benefits that contribute to the overall satisfaction and retention of our valuable workforce.

By incorporating the "Thinking Long Term" clause into our HR policy, we aim to cultivate a workforce that not only meets the immediate needs of the company but also contributes to its sustained growth and prosperity in the dynamic financial landscape of Sri Lanka.

16. Making Value Based Decisions

In alignment with our commitment to fostering a culture of integrity, transparency, and excellence, The Company as a responsible financial institution in Sri Lanka, places great emphasis on making value-based decisions. The following clause outlines our approach to ethical decision-making within the context of our HR policy:

1. Integrity and Ethical Standards:

- All employees are expected to uphold the highest standards of integrity in their professional conduct.
- Decision-makers must adhere to ethical principles, considering the impact of their choices on stakeholders, clients, and the community at large.

2. Compliance with Regulatory Framework:

- Decisions made by employees must comply with all applicable laws and regulations governing the financial industry in Sri Lanka.
- Adherence to industry-specific ethical codes and guidelines is mandatory in decision-making processes.

3. Client-Centric Approach:

- Decisions should prioritize the best interests of our clients, ensuring fair and transparent dealings in all financial transactions.
- Upholding trust and maintaining a client-centric focus are integral components of our decision-making ethos.

4. Risk Management and Prudence:

- Decisions must take into account the financial and operational risks associated with various courses of action.
- The company promotes a culture of prudence, emphasizing the responsible assessment and management of risks in decision-making processes.

5. Diversity and Inclusion:

- Decisions should reflect a commitment to diversity and inclusion, considering the perspectives and experiences of a diverse workforce.
- The company recognizes the value of diverse viewpoints in fostering innovation and sound decision-making.

6. Social Responsibility:

- Value-based decisions extend to social responsibility, with a focus on contributing positively to the community and minimizing negative environmental impacts.
- Employees are encouraged to actively engage in initiatives that promote social and environmental sustainability.

7. **Continuous Learning and Improvement:**

- Decision-makers are expected to stay informed about industry best practices and continuously improve their decision-making skills.
- A commitment to ongoing professional development ensures that decisions are informed, strategic, and aligned with the company's values.

By incorporating these principles into our HR policy, we aim to create a workplace culture where value-based decision-making becomes second nature, reinforcing our position as a trusted and responsible financial partner in Sri Lanka.

ETHICS PLUS Decision Making Model

Introduction:

The company is committed to upholding the highest standards of ethical conduct and integrity in all aspects of its operations. As a leading finance company in Sri Lanka, we recognize the importance of ethical decision-making in maintaining trust and fostering a positive work environment. In pursuit of these principles, we adopt the "ETHICS PLUS Decision Making Model" as an integral part of our HR policy.

ETHICS PLUS Decision Making Model:

The "ETHICS PLUS Decision Making Model" is a comprehensive framework designed to guide employees in making ethical decisions that align with the values and objectives of The Company. This model encompasses the following key principles:

1. **Ethical Awareness:** Employees are expected to be aware of the ethical implications of their decisions and actions. This involves recognizing potential ethical dilemmas and seeking guidance when uncertainties arise.
2. **Transparency and Accountability:** All decision-making processes should be transparent, with employees taking responsibility for the consequences of their choices. Accountability is crucial to maintaining trust within the organization and with external stakeholders.
3. **Honoring Laws and Regulations:** Decisions must comply with all applicable laws and regulations governing the finance industry in Sri Lanka. This includes a commitment to staying informed about legal requirements and promptly addressing any legal concerns.
4. **Integrity in Financial Practices:** As a finance company, maintaining the highest standards of integrity in financial dealings is paramount. Employees must avoid conflicts of interest, accurately report financial information, and adhere to ethical practices in all financial transactions.

5. **Customer-Centric Approach:** Ethical decision-making involves prioritizing the interests of our customers. Employees should strive to provide fair and transparent services, ensuring that customer trust and satisfaction are upheld at all times.
6. **Social Responsibility:** Employees are encouraged to consider the broader impact of their decisions on society. This includes promoting environmental sustainability, supporting community initiatives, and engaging in responsible corporate citizenship.

Implementation and Enforcement:

The Company is committed to providing the necessary resources, training, and support to ensure the successful implementation of the "ETHICS PLUS Decision Making Model." Violations of ethical standards will be subject to disciplinary action, up to and including termination, depending on the severity of the breach.

Conclusion:

By adopting the "ETHICS PLUS Decision Making Model" in our HR policy, The Company aims to foster a culture of integrity, trust, and responsibility among its employees. Through the consistent application of ethical principles, we believe that our company will continue to thrive and contribute positively to the finance industry in Sri Lanka.

The ETHICS process - Six major steps to follow (when necessary do not hesitate to seek the assistance of one's reporting officer):

Establish the relevant facts and identify the ethical issues.

Take stock of all stakeholders or parties involved.

Have an objective assessment of each stakeholder's position.

Identify viable alternatives and their effects on the stakeholders.

Compare and evaluate the likely consequences of each alternative with reference to the standards expected.

Select the most appropriate course of action.

The PLUS standards - Four key factors to consider:

Professional/Trade-related/Company code of conduct

Legal requirements; e.g. are there any breaches of the laws such as the Bribery Act, Banking and finance Act,

Uncompromising self-values; e.g. honesty, fairness, trustworthiness, etc.

Sunshine test; i.e., whether the issue can be discussed openly and the decision disclosed without misgivings?

The Sunshine Test: “make sure what you do could stand being made public”

The Sunshine Test:

At The Company, we believe in fostering a workplace culture built on transparency, integrity, and ethical conduct. To uphold these principles, we have instituted the "Sunshine Test" as an integral part of our HR policy. The Sunshine Test serves as a benchmark to ensure that all employees align with the highest standards of honesty and openness in their professional conduct.

- 1. Open Communication:** Employees are encouraged to communicate openly and honestly with colleagues, supervisors, and other stakeholders. Transparency in all professional interactions is vital to maintaining trust within the organization.
- 2. Ethical Decision-Making:** Employees are expected to make decisions that uphold the highest ethical standards. When faced with dilemmas, individuals should consider the long-term consequences of their actions and choose paths that align with the company's values and ethical guidelines.
- 3. Whistleblower Protection:** The Company is committed to protecting employees who come forward with concerns about unethical behavior or policy violations. Whistleblowers will be shielded from retaliation, and the company ensures a confidential and fair process for reporting such concerns.
- 4. Financial Transparency:** In a finance-centric environment, it is imperative to maintain transparency in financial transactions and reporting. Employees involved in financial activities must ensure accuracy, completeness, and honesty in all financial dealings.
- 5. Conflict of Interest:** Employees must disclose any potential conflicts of interest that may compromise their ability to make impartial and fair decisions. This includes financial interests, relationships, or activities that may conflict with the best interests of the company.
- 6. Continuous Education and Training:** [Company Name] is committed to providing ongoing training and resources to ensure that employees are aware of the latest ethical standards and industry best

practices. This ensures that our workforce remains well-informed and equipped to navigate complex ethical situations.

7. **Sunshine Committee:** A designated Sunshine Committee will be established to periodically review and assess the company's adherence to ethical standards. This committee will also be responsible for promoting ethical behavior and providing guidance on ethical dilemmas.

By adhering to the principles outlined in the "Sunshine Test" clause, the company aims to create a workplace where trust and integrity are the foundation of our professional relationships, fostering a culture that benefits our employees, clients, and the community at large.

If you think it would look bad if someone else knew, then don't do it.

Contrary to the "nothing to hide" argument, the Sunshine Test doesn't mean that everything should be public. It means that you should be prepared for the possibility that what you do may one day be made public. And since everything becomes public by default, this possibility is increasingly likely.

TELEPHONE AND EMAIL ETIQUETTE

Effective communication is essential in maintaining a professional and productive work environment. To ensure consistency and professionalism in our interactions, employees are expected to adhere to the following telephone and email etiquette guidelines:

1. Professional Tone:

- When using the telephone or composing emails, maintain a professional and courteous tone at all times.
- Use formal language and avoid the use of slang, abbreviations, or inappropriate language.

2. Answering Calls:

- Answer incoming calls promptly and identify yourself clearly by stating your name and department.
- Be attentive and listen actively to the caller's inquiries or concerns.

3. Voicemail:

- Ensure that voicemail greetings are clear, concise, and professional.
- Respond promptly to voicemail messages, returning calls within a reasonable timeframe.

4. Email Formatting:

- Use clear and concise subject lines that accurately reflect the content of the email.
- Properly address recipients, including a salutation and closing in emails.
- Avoid using all capital letters, bold, or excessive punctuation, as it may be perceived as unprofessional.

5. Timely Responses:

- Respond to emails and return phone calls in a timely manner. Acknowledge receipt of emails, even if a detailed response will follow later.

6. Confidentiality:

- Exercise caution when discussing sensitive information over the phone or in emails. Avoid disclosing confidential company or client information without proper authorization.

7. Conference Calls:

- Prepare for conference calls in advance, familiarizing yourself with the agenda and any relevant materials.
- Mute your microphone when not speaking to minimize background noise and maintain professionalism.

8. Cell Phone Usage:

- Refrain from using personal mobile phones for work purposes unless necessary. If required, ensure that conversations are conducted in a private and quiet location.

9. Signature Block:

- Include a professional email signature block that includes your name, position, and contact information.

10. Dispute Resolution:

- In the event of a misunderstanding or dispute arising from a communication, address the issue promptly and professionally with the involved parties.

Failure to adhere to these telephone and email etiquette guidelines may result in corrective action, as outlined in the company's disciplinary policy.

Employees are encouraged to seek clarification from the Human Resources Department if they have any questions regarding these guidelines or if they require further assistance in improving their communication skills.

SOCIAL MEDIA AND OTHER EXTERNAL COMMUNICATIONS

Purpose:

The purpose of this policy is to establish guidelines for employees regarding their use of social media and other external communications to ensure that the reputation and confidentiality of The Company are maintained, and compliance with regulatory requirements is upheld.

Scope: This policy applies to all employees of the company who engage in social media activities or external communications related to the company, its clients, or its business operations.

Guidelines:

1. Confidentiality:

- Employees must not disclose any confidential or proprietary information about The Company, its clients, or its business operations on social media or any other external platforms.

2. Professional Conduct:

- Employees are expected to maintain a professional and respectful tone in all online communications. Avoid engaging in discussions that could harm the company's reputation or violate ethical standards.

3. Endorsements and Representations:

- Employees should not represent themselves as spokespersons for The Company unless explicitly authorized to do so. Personal opinions should be clearly distinguished from official company statements.

4. Compliance with Laws and Regulations:

- All social media and external communications must comply with applicable laws and regulations, including those related to privacy, data protection, and financial services.

5. Monitoring and Enforcement:

- The Company reserves the right to monitor employees' social media activities to ensure compliance with this policy. Violations may result in disciplinary action, up to and including termination of employment.

6. Reporting:

- Employees are encouraged to report any social media or external communications that may have a negative impact on the company's reputation or violate this policy to the HR department.