

# Whistleblowing Policy

Board : Board of Directors of Gestetner of Ceylon PLC

Company: Gestetner of Ceylon PLC

Version: 01

Listing Rules': Listing Rule 9.2.1 (k)

## 1. OBJECTIVE

Gestetner of Ceylon PLC (the Company) is dedicated to establishing a framework that enables disclosures to be made without fear of victimization or subsequent discrimination, and aims to achieve this through the implementation of this policy

## 2. SCOPE OF THE POLICY

**2.1.** The Policy is designed to deal with disclosures by employees, customers, suppliers, shareholders and any other third parties.

**2.2.** This policy covers all genuine disclosures relating to:

- Unlawful civil or criminal offence.
- Failure to comply with statutory obligations/requirements.
- Financial Misconduct
- Health and Safety Risks
- Environmental Damage
- Unfair discrimination
- Corruption and Misconduct including bribery.
- Attempts to suppress or conceal any information relating to any of the above

**2.3.** The policy does not apply to personal grievances, which will be covered under other laws of the country. A separate anti-harassment and retaliation policy is available to deal with the complaints on the subject, that includes an independent helpline connected to a designated person outside the company.

**2.4.** This policy must be read with the relevant policies addressing grievances, disciplinary, unfair labour practices of the Company.

### **3. WHISTLE BLOWING POLICY FOR EMPLOYEES**

Employees are often the first to recognize potential issues within the company. However, they may be reluctant to raise their concerns due to feelings of disloyalty towards their colleagues or the organization, or out of fear of harassment or victimization. In such cases, it may seem easier to ignore the problem rather than report what could merely be a suspicion of wrongdoing. The safeguards against whistleblowing employees are available above under point No.3.3.

The Company is committed to maintain the highest standards of openness, probity, and accountability. In line with this commitment, we encourage employees and others with serious concerns about any aspect of above to come forward and voice those concerns. We recognize that certain cases may need to be handled confidentially. This policy document clarifies that employees can raise concerns without fear of reprisals. The Whistle blowing Policy is designed to encourage and enable employees to address serious issues within the company, rather than overlooking problems or reporting them externally.

#### **3.1 Aims and Scope of This Policy**

Provide avenues for you to raise concerns and receive feedback on any action taken, reassure you that you will be protected from reprisals or victimisation for whistleblowing in good faith and consideration will be given to redeployment if you request it.

There are existing procedures in place to enable you to lodge a grievance relating to your own employment. This whistle blowing policy is intended to cover concerns that fall outside the scope of other procedures.

That concern may be about something that:

- is unlawful; or
- is against the Company Standing Orders, Financial Regulations or policies; or
- falls below established standards or practice; or
- amounts to improper conduct.

#### **3.2 Safeguards**

- *Harassment or Victimisation*

The Company recognizes that the decision to report a concern can be challenging, particularly due to the fear of reprisal from those responsible for the malpractice. The Investigation committee will not tolerate harassment or victimization and is committed to taking action to protect you when you raise a concern in good faith

This does not mean that if you are already the subject of disciplinary or redundancy procedures, that those procedures will be halted as a result of your whistleblowing.

- ***Confidentiality***

The Company will make every effort to protect your identity when you raise a concern and wish to remain anonymous.

The investigation process may reveal the source of the information, and your statement may be required as part of the evidence.

- ***Anonymous Allegations***

This policy encourages you to attach your name to your allegation. Concerns expressed anonymously are generally less impactful, but they will be considered based on the applicability at the investigation.

### **3.3 How to Raise Concerns**

As a first step, you should generally raise your concerns with your immediate supervisor or the Head of your Business Unit. However, this may depend on the seriousness and sensitivity of the issue, as well as the individuals involved. For example, if you suspect that management is implicated, you should report the matter to the Executive Director, another member of the Board of Directors, Chairman or Chief Human Resources Officer. If you prefer to contact someone outside, you can reach out to the “Whistleblower Protection Officer”.

It is advisable to submit concerns in writing. You are encouraged to provide relevant details, including the background, history, names, dates, and locations where possible, along with the reasons for your concern.

If you do not feel comfortable putting your concern in writing, you may call or meet with the appropriate officer.

The sooner you express your concern, the easier it will be to take action.

While you are not expected to prove the truth of an allegation, you will need to demonstrate to the person contacted that there are sufficient grounds for your concern.

Advice and guidance on addressing any concerns can be obtained from the Human Resources Department.

## **4. REPORTING MECHANISM FOR CUSTOMERS, SUPPLIERS AND SHAREHOLDERS.**

Concerns of customers, suppliers and shareholders can be reported through multiple channels to ensure accessibility. The Company is committed to maintaining the confidentiality of all reports received and maintains a strict no-retaliation policy.

Any acts of retaliation against whistleblowers will be investigated and addressed severely.

### **4.1 Investigation Process**

Upon receipt of a report, the Company will initiate the following steps:

1. **Acknowledgment:** The whistleblower will receive acknowledgment of the report within one week.
2. **Investigation:** A thorough and impartial investigation will be conducted by an appointed investigator.
3. **Outcome Communication:** The whistleblower will be informed of the investigation's outcome, where appropriate.

The Company will ensure that investigations are completed promptly and with minimal disruption to operations.

#### 4.2 Responsibilities

- **Whistleblowers:** It is the responsibility of all stakeholders to report concerns promptly and provide any necessary information to assist in the investigation.
- **Chief Human Resources Officer:** The Chief Human Resources Officer is responsible for overseeing the whistleblower program, ensuring confidentiality, and leading investigations.
- **Management:** Management must support and promote a culture of openness and transparency, ensuring all employees and stakeholders understand this policy.

#### 5. CONCLUSION

Gestetner of Ceylon PLC, we are committed to upholding the highest standards of ethics and integrity. Your concerns are vital to maintaining our reputation and ensuring a safe and responsible business environment. We encourage all customers, suppliers, and shareholders to report any unethical behavior.