



## **ANTI-BRIBERY & ANTI-CORRUPTION (ABAC) POLICY**

### **1. Policy Framework and Scope**

The ABAC Policy of Hemas outlines guidelines to prevent bribery and corruption across Hemas Holdings PLC, its subsidiaries and affiliates (hereinafter referred to as “Hemas”).

The policy is applicable to all directors, employees, and any person authorized to represent or act on behalf of Hemas. The policy covers interactions with private sector individuals as well as public, and government officials.

By enforcing a zero-tolerance approach towards bribery and corruption, this policy reinforces Hemas’ commitment to upholding the highest standards of corporate governance, transparency, and ethical conduct in all its operations.

### **2. Objectives**

The primary objectives are:

- To eliminate bribery and corruption in all business interactions.
- To ensure compliance with the applicable laws and regulations.
- To raise awareness among stakeholders about ethical decision-making in compliance with regulations.
- To foster a culture of integrity.

### **3. Responsibilities**

The Board of Directors of Hemas holds the overall responsibility for this policy and for ensuring its compliance across the organization.

Employees are required to read, understand, and adhere to the policy and report any suspicions of bribery or corruption through the provided channels.

Failure to comply with the policy may result in disciplinary action, up to and including termination of employment.

### **4. Bribery, Facilitation Payments and Kickbacks**

Bribes, facilitation payments, and kickbacks, whether financial or otherwise, are strictly prohibited, including the offering or acceptance of such payments to or from private individuals, public and government officials.

### **5. Gifts, Hospitality, and Entertainment (GHE)**

The offering and acceptance of GHE are strictly prohibited, except in very limited circumstances where prior approval is obtained in accordance with Hemas Limits of Authority and alignment with the Hemas Way.

## 6. Donations and Sponsorships

Hemas provides donations and sponsorships to NGOs, the general public and the wider community in alignment with its purpose and vision. Donations and sponsorships should not be made to secure any improper advantage or retain any business relationship. Good judgement and due diligence must be exercised to assess the purpose and intention, legitimacy of the donation or sponsorship, and the reputation or status of the beneficiaries. All sponsorships or donations shall be offered and made transparently in accordance with Hemas Mandatory Guidelines and Limits of Authority, with all necessary documentations maintained as evidence.

Hemas is a-political and believes in political non-alignment. This means that employees should not contribute assets of Hemas to support political parties or candidates for political office. However, this does not preclude employees from either associating with elected administrators or supporting programs by elected administrators for the benefit of the broader community in accordance with corporate social responsibility guidelines or policies of Hemas.

## 7. Conflict of Interest

All individuals to whom this policy applies are required to identify and avoid conflicts of interest. Any actual or perceived conflicts must be promptly disclosed to the Head of Department and the HR Department, and appropriately documented.

## 8. Documentation

All relevant documents, approvals, receipts, and evidence related to this policy must be securely stored.

## 9. Speak Up

Hemas employs the Whistleblowing Policy to establish official channels for reporting, ensuring protection against reprisals in cases of

- a) suspicion of fraudulent transactions
- b) ABAC policy violations and breaches

All stakeholders, including employees, vendors, clients, contractors, and customers, are urged to voice concerns regarding misconduct or illegal/unethical behavior. Hemas has zero tolerance towards retaliation and all the reports are treated confidentially and investigated following due procedure to address any issues. Please refer to the Whistleblowing policy and Anti-Fraud policy for more information.

## 10. Awareness on Policy

- An awareness session will be done annually on the ABAC policy through HR.
- A more in-depth training will be provided frequently to high-exposure roles by Group Legal.
- New hires shall be apprised on the ABAC Policy during the induction programme.
- The ABAC Policy of Hemas will be readily available to all employees for future reference.



### **11. Monitoring**

All Business Unit Heads of HEMAS shall remain vigilant regarding their transactions to ensure their respective teams are familiar with and are following the ABAC Policy.

### **12. Review and Revision**

This Policy shall be reviewed by Group HR once in 2 years or as deemed necessary with the involvement of Group Legal and Group Risk & Control to ensure that the policy is updated and aligned with the current practices of the business and laws of Sri Lanka.

Any amendments shall be recommended to the Board by Group HR for approval. All stakeholders shall be informed of any revisions made to the policy.