



MAHAWELI COCONUT PLANTATIONS PLC

CORPORATE GOVERNANCE POLICIES

Policy on Anti-Bribery and Corruption

The Company places the utmost importance on ethical practices in all its business operations and has promulgated a zero-tolerance policy towards bribery and corruption in all aspects of doing business and strives to maintain a culture of transparency and honesty in all its dealings with both internal and external stakeholders.

The Code of Conduct, anti-fraud, fraud prevention, anti-corruption, anti-bribery, anti-money laundering, counter-terrorist financing, gifting, audit, and transparency policies, amongst many others, outline the principles to which the Company is committed in relation to preventing, reporting, and managing unethical practices. Accordingly, all forms of fraud and corruption, including, but not limited to, theft, embezzlement, overriding controls, giving or receiving kickbacks, facilitation payments, bribery, allowing oneself to be placed in situations of conflict of interest and dishonesty in financial and non-financial statements are prohibited across the Company.

Furthermore, the Company is continuously engaged in taking steps to strengthen its Code of Conduct deviation monitoring and resolution process. Policies on anti-fraud, anti-corruption and anti-money laundering and countering the financing of terrorism and company Code of Conduct, amongst other policies, also encompass:

- anti-bribery controls to prevent payments and contributions being made with the aim of obtaining an improper business benefit from any party including, but not limited to, clients, service providers, customers, business associates and political parties; and
- controls on gifting and favors. The giving or accepting gifts or favors in whatsoever form, including from clients, service providers, customers, business associates and political parties and any other stakeholder we engage with in the course of carrying out duties in our professional capacity, is prohibited if it was possible on the part of a 'reasonable person' to conclude that the giving/ acceptance of such gifts or favours could directly or indirectly affect one's independence in decision-making and conduct as an employee and/or if it could be seen by others as a consideration for an official or business favour. The 'reasonable person' test should also be applied in respect of charitable donations and sponsorships (financial or in-kind) that are made.

Zero tolerance on corruption

The company strongly believes that bribery and corruption is unethical, unacceptable and inconsistent with our Values and our Code of Ethics. So the company regularly educates the employees through corporate communications and further guidelines are provided in the Staff Handbook and Whistle Blowing policy.