

POLICY ON WHISTLEBLOWING

1. THE POLICY

Our whistle-blowing service offers employees and Seylan Developments PLC's stakeholders an anonymous and secure avenue for reporting unethical conduct. The policy encourages Seylan Developments PLC employees and related parties who have concerns to come forward and express these views without fear of punishment or unfair treatment in cases of;

- Suspected serious misconduct or
- Any breach or suspected breach of law or regulation or
- Conflicts of interest that may adversely affect the Company, the Company's customers, shareholders, employees, investors or the public at large.

2. PRINCIPLES

- No risk of disclosure to the whistleblower and confidentiality will be ensured.
- Whistleblowing should be genuine and evidence to be produced which is sufficient to substantiate the complaint.
- Disciplinary action will be taken against employees for fake or fictitious information.
- This procedure provides avenues for employees and related parties to raise concerns over Misconduct and define ways to handle these concerns.
- Enable management to be informed at an early stage about misconduct.
- To reassure employees that they will be protected from punishment or unfair treatment for disclosing concerns in good faith in accordance with this procedure.
- To help develop a culture of openness, accountability, and integrity.

3. SCOPE

This procedure governs the reporting and investigation of misconducts at the Company as well as the protection offered to the whistleblowers. This procedure applies to all employees of the company and related parties such as the company's customers, shareholders, employees, investors, other stakeholders and the public at large.

4. METHOD OF REPORTING ALLEGATIONS OF MISCONDUCT

- The Nomination and Governance Committee functions as the Whistleblowing unit of the Company for receiving, shortlisting and evaluating complaints received from whistleblowers. A summary of all complaints received by the Whistleblowing Unit will be submitted to the Audit Committee and the Board.
- Misconduct may be disclosed in writing, by telephone, e-mail, any other digital media or in person. However, all Reports are encouraged to be made in writing, so as to assure a clear understanding of the issues raised.
- Whistleblower may report allegations of Misconduct to the Whistleblowing Unit through the following Reporting Channels.

Tel : 011-2456590
Email : navindra@seylandevelopments.com
Letters and documents to be addressed to:

Chief Operating Officer,
Seylan Developments PLC,
Level 15, Seylan Towers,
No: 90, Galle Road,
Colombo 03

5. PROCESS OF EVALUATING AND REVIEWING THE COMPLAINT

- The Whistleblowing Unit shall have a clear and complete record of complaint and it has a authority to call any employee for a discussion or call information from the relevant employees after giving due notice when reviewing and evaluating a complaint received by the Whistleblowing Unit.
- The Whistleblowing Unit shall conduct evaluating and reviewing each reported misconduct with a view to establish whether there is a prima-facie case for each alleged misconduct and whether it is appropriate to proceed further with an internal audit/forensic audit or employee disciplinary investigation after gathering more information / evidence from whistleblowers if possible.
- The Whistleblowing Unit shall report its findings to the Audit Committee on each complaint received by the Unit and Feedback may be given to the whistleblower on the outcome of the complaint where relevant.

6. CONFIDENTIALITY AND PROTECTION OF THE WHISTLEBLOWERS

The company will make all efforts in good faith to protect the confidentiality of Whistleblowers who report the Unlawful Act, provided however, the company or its employees and agents shall be permitted to reveal the Whistleblower's identity and confidential information to the extent necessary to permit a thorough and effective investigation, as required by law or court proceedings. In addition, the company will not tolerate any effort made by any other person or group, to ascertain the identity of any person who makes complaints in good faith about misconduct.

7. REVIEW OF THE POLICY

The policy is reviewed by the Company on a regular basis to ensure its relevance and effectiveness. Updates may be made, when appropriate, to reflect the latest best practices and future amendments in listing rules.

8. PUBLICATION OF THIS POLICY

This Policy is made available in Seylan Developments PLC's corporate website for the perusal of its shareholders and other interested stakeholders.

Approved by : Board of Directors
Date : 25.09.2024