

SATHOSA MOTORS PLC



Policy on Anti – Bribery and Corruption

**Sathosa Motors PLC
25, Vauxhall Street, Colombo 02**

30TH SEPTEMBER 2024

Anti-Bribery and Corruption Policy

Introduction:

This Anti-Corruption Compliance Policy (the "Policy") establishes guidelines to prevent and combat bribery and corruption within SML. The organization has a zero-tolerance approach toward any form of corrupt activity, and violations may result in disciplinary actions, including dismissal.

Types of Corruption:

Bribery involves offering, promising, or giving anything of value to influence the decisions of government officials or any other individuals. Corruption refers to the abuse of entrusted power for personal gain, with bribery and fraud being examples of such practices. All directors, management, and employees must refrain from any act of bribery or corruption, either directly or through third parties.

Acts of Bribery and Corruption:

Common forms of bribery and corruption include making improper payments, offering unauthorized gifts or hospitality, or seeking to influence officials or other parties for an unfair advantage. It is imperative for all personnel to seek guidance from senior officers or HR if they are uncertain about any aspect of this policy.

Administration & Implementation:

Compliance with this policy is the responsibility of all individuals across the organization. Key roles such as HR, procurement, and the company secretary ensure policy dissemination, employee training, and regular updates based on legal or operational changes. Risk assessments are conducted to determine the need for additional safeguards and training.

Reporting & Protection:

Employees are encouraged to report any concerns regarding corruption to their supervisors, HR, or the Audit Committee. Reports can be made confidentially, with protections in place to prevent retaliation.

Penalties and Disciplinary Action:

Violations of this policy will result in disciplinary actions, including termination.

PASSED BY THE BOARD OF DIRECTORS THROUGH A CIRCULATED RESOLUTION ON 30TH SEPTEMBER 2024