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# **Whistleblowing Policy**

**Sri Lanka Telecom PLC and its Subsidiaries and  
Associates (“SLT Group”)**

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# CONTENTS

|   | Page No. |
|---|----------|
| 1. OBJECTIVE  | 3        |
| 2. PRINCIPLES   | 3        |
| 3. SCOPE  | 3        |
| 4. DEFINITIONS  | 3        |
| 5. SOME ACTS OF MISCONDUCT                              | 4        |
| 6. METHOD OF REPORTING ALLEGATIONS OF MISCONDUCTS       | 5        |
| 7. PROCESS FOR EVALUATING AND REVIEWING THE COMPALINT   | 6        |
| 8. EXEMPTIONS FOR THE PROCEDURE                         | 6        |
| 9. CONFIDENTIALITY AND PROTECTION OF THE WHISTLEBLOWERS | 7        |
| 10. REVIEW OF PROCEDURE                                 | 7        |
| 11. PROCEDURE AVAILABILITY                              | 7        |

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## 1. OBJECTIVE:

Encouraging SLT-MOBITEL (the Company) employees and related parties who have concerns about, 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. (Herein after individually or collectively referred to as Misconduct/s), to come forward and express these concerns without fear of punishment or unfair treatment.

## 2. PRINCIPLES

- No risk of disclosure to the whistleblower and confidentiality will be ensured.
- Whistleblowers are recommended to identify themselves to the Whistleblowing Unit.
- 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 Misconducts and define ways to handle these concerns.
- Enable management to be informed at an early stage about Misconducts.
- 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 is applicable to all employees of the company (SLT-MOBITEL Group) and related parties such as the company's customers, shareholders, employees, investors, other stakeholder and the public at large.
- Employees and related parties dealing with the Company and customers are encouraged to raise any concerns (hereinafter referred to as "Report") over Misconducts.

## 4. DEFINITIONS

- **Whistle-blower:** Whistle-blower is as a person or entity making protected disclosure about Misconducts. They may be employees of the Company, applicants for employment, shareholders, investors, vendors, suppliers, contractors, customers, any third part, any other stakeholder or the general public. Whistle-blower is a reporting party who is not an investigator or a fact finder nor does he/she determine the appropriate corrective or remedial action that may be warranted.
- **Employee :** Any employee who is on permanent/contract cadre of SLT-MOBITEL Group (including all subsidiaries).

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- **Good Faith** : The Procedure presumes that Whistle-blower will act in good faith and will not make false/ fictitious accusations when reporting any Misconducts. .Good faith is evident when the Report is made without malice or consideration of personal benefit and the employee has a reasonable basis to believe that the Report is true. An employee who knowingly or recklessly makes statements or disclosures that are not in good faith may be subject to disciplinary action. The Company will make all efforts in good faith to protect the confidentiality of Whistle-blower/s who report the Misconducts; provided, however, the company or its employees and agent shall be permitted to reveal the reporting Whistle-blower/s identity and confidential information to the extent necessary to permit a thorough an effective investigation, as required by law or court proceedings.

## 5. SOME ACTS OF MISCONDUCTS

Some of the Misconducts, which can be reported under this Procedure, are given below. The list is intended to serve as a guide and is not exhaustive or complete.

- Violation of any applicable laws, rules, regulations and policies.
- Any dishonest or unethical behavior.
- Violation of the Code of Business Practices of the Company.
- Fraudulent activities and corrupt conduct. It is a willful or deliberate act or failure to act with the intention of obtaining an unauthorized benefit. Examples include, but are not limited to:
  - Corruption: conflicts of interest, bribery, illegal gratuities, and economic extortion.
  - Cash asset misappropriation: Theft; cheque tampering; and fraudulent disbursements, including billing, payroll, and expense reimbursement schemes.
  - Non-cash asset misappropriation: Theft; false asset requisitions; destruction, removal or inappropriate use of records and equipment; inappropriate disclosure of confidential information; and document forgery or alteration.
  - Fraudulent statements: financial reporting, employment credentials, and external reporting.
  - Fraudulent actions by customers, vendors or other parties include bribes or inducements, and fraudulent (rather than erroneous) invoices from a supplier or information from a customer.
- Misrepresentation or negligent acts in preparation or evaluation of any audit or any financial statement of the Company.
- Deficiencies in or non-compliance with the Company's internal policies and controls.
- Conflict of interest in employment.
- Conduct involving substantial risk to the company or public health, safety and substantial risk to the environment.

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- It applies to unlawful, improper or unethical behavior of any kind. It includes, but is not limited to, any behavior that undermines, or may undermine, the Company's policies, procedures, practices or any other expected, or otherwise established, standard of conduct.

## **6. METHOD OF REPORTING ALLEGATIONS OF MISCONDUCT**

- Complaint of Whistleblower evaluating and reviewing Committee (Whistleblowing Unit)
  - An independent Whistleblowing Unit shall be established by the Company for receiving, shortlisting and evaluating complaints received from whistleblowers through the Reporting Channels as stated under Clause 5.3 and it is the duty of the Whistleblowing Unit to decide whether there is a prima-facie case to proceed further with an internal audit/forensic audit or employee disciplinary investigation and submit a report to the Audit Committee, which will direct the Chief Internal Auditor and the CEO to take appropriate action. A summary of all complaints received by the Whistleblowing Unit will be submitted to the Audit Committee of the Board.
  - Whistleblowing Unit consists with minimum of 03 competent individuals and a secretary appointed by the Board of Directors for a term of period, for the remuneration as decided by the Board of Directors. The Board of Directors shall have the power to remove any member including the Chairman and the secretary of the Whistleblowing Unit at any time with one month's notice. Also, any member of the Whistleblowing Unit including the Chairman and secretary may resign by giving one month's written notice to the company.
  - One of the members shall be appointed as the Chairman of the Whistleblowing Unit by the Directors. Minimum of two members of the Whistleblowing Unit (excluding the secretary) shall participate when taking decisions on the complaint received by the Whistleblowing Unit and decision of the majority of the members (Excluding the secretary) is regarded as final decision of the Whistleblowing Unit
- 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.
  - Ethics Hotline (Voice Mail Service/WhatsApp): 070 568 2121
  - Email: Whistleblower@slt.net.lk
  - Letters and documents to be addressed to: P.O Box 2323, Colombo 10.
- In case of reports sent through e-mail, it is recommended to mark the subject as "The Company Whistleblower" for easy identification.
- Although the whistleblower is not expected to prove the truth of an allegation, he/she needs to provide the necessary evidence that he / she poses in support of establishing the allegation.
- Individuals are recommended to identify themselves, though it is not a requirement of the Procedure. A Code Number will be allocated to each complaint and the informant

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(Whistleblower) can use this code number to provide additional information as evidence, while maintaining the anonymity.

- Any anonymous letters/complaints received by the Whistleblowing Unit, alleging any employee for misconduct, without any credible evidence / information will be kept with Complaint Receiving Authority confidentially for a period of three months from the date of receipt. If the sender fails to submit the necessary supportive evidence within this period, Whistleblowing Unit will take necessary actions to destroy those letters, after obtaining the approval from the Audit Committee of the Board.

## **7. PROCESS FOR EVALUATING AND REVIEWING THE COMPLAINT**

- The Whistleblowing Unit shall maintain a register of complaints received and allocate a serially controlled unique number for each complaint received and notify the whistle-blower and acknowledge receipt of the information of any misconduct within a week (if possible, to communicate with the whistle-blower). When an anonymous complaint is received, while encouraging the complainants to declare themselves, the Whistleblowing Unit shall use all possible avenues to establish communication channel / (s) with the anonymous complainants and communicate the unique number allocated for the complaints. Thereby the anonymous complainants can provide additional information / evidence under the unique number communicated to them.
- If need arises, the Whistleblowing Unit shall have the 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 of Sri Lanka Telecom PLC on each complaint received by the Unit.
- Feedback may be given to the whistleblower on the outcome of the complaint where relevant.

## **8. EXEMPTIONS FOR THE PROCEDURE**

Disclosures related to the following areas are not covered under this procedure.

- Personal work-related grievances
  - This procedure does not apply to any personal work-related grievances. A personal work-related grievance is a grievance about any matter in relation to employment or former employment having (or tending to have) implications for personally, which may include:
  - An interpersonal conflict between two employees
  - A decision relating to an engagement, transfer or promotion of an employee.

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- A decision relating to the terms and conditions of engagement; and
  - A decision to discipline an employee or to suspend or terminate engagement due to the way the employee performed his/her role.
  - The Committee will inform such concerns constitutes a personal work-related grievance which falls more properly within the Company's Grievance Handling Guidelines. Such concerns should be directed accordingly.
  - False Disclosures

This Procedure will only apply to genuine claims and Reports. SLTMOBITEL takes deliberately or maliciously false Reports/complaints very seriously and disciplinary action may follow.

## **9. 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 Misconducts.

## **10. REVIEW OF PROCEDURE**

The Company reserves the right to review or amend the above procedure as and when deemed necessary.

## **11. PROCEDURE AVAILABILITY**

This Procedure will be available for all SLT-MOBITEL employees to view on intranet or any other appropriate form. To ensure it is available to all eligible Whistle blowers, the Procedure will also be available on SLT-MOBITEL corporate website.