

# LANKA ALUMINIUM INDUSTRIES PLC

# WHISTLEBLOWING POLICY

#### **1. PURPOSE**

Lanka Aluminium Industries PLC is dedicated to maintaining the highest ethical, legal, and moral standards. This Whistleblowing Policy aims to provide a secure, confidential mechanism for employees and stakeholders to report concerns that may impact the organization. The policy ensures protection from retaliation for those who report in good faith.

#### 2. SCOPE

This policy applies to all employees, contractors, suppliers, business partners, and other stakeholders involved with Lanka Aluminium Industries PLC. It covers all levels of staff (permanent, contract, and temporary).

**Reportable Concerns** include, but are not limited to:

- Financial misconduct (e.g., fraud, incorrect reporting)
- Unethical, illegal, or improper conduct
- Violations of company policy, code of conduct, or ethical standards
- Harassment, bullying, discrimination, and other workplace misconduct
- Environmental, health, and safety violations
- Misuse of company resources or assets
- Potential conflicts of interest

#### 3. REPORTING

Reports can be submitted confidentially to the board of Directors.

Employees and stakeholders are encouraged to provide as much detailed information as possible, including relevant dates, individuals involved, and supporting documents.

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### 4. PROTECTION AND CONFIDENTIALITY

Lanka Aluminium Industries PLC is committed to protecting the confidentiality of whistleblowers who report concerns in good faith. Measures include:

- **Confidentiality:** Whistleblower identities will be kept confidential unless required by law or consented to by the whistleblower.
- **Protection from Retaliation:** Retaliation against individuals reporting concerns or participating in investigations is strictly prohibited and will result in disciplinary action.
- **Anonymous Reporting:** Anonymous submissions will be accepted, although anonymity may limit the ability to gather additional information or provide feedback.

### **5. INVESTIGATION PROCEDURE**

Upon receiving a report, the board will appoint a Whistleblower Protection Officer or the designated authority will:

- Acknowledge Receipt: Confirm receipt of the report, if the whistleblower's identity is known.
- **Initial Assessment:** Determine if the report requires investigation and assign it to an internal investigation team or an external body if necessary.
- **Investigation:** Conduct a thorough, fair, and timely investigation. The accused individual(s) will have an opportunity to respond to allegations if the investigation deems it appropriate.
- **Outcome Reporting:** Findings will be documented, and appropriate corrective actions will be implemented. The whistleblower will be updated on the outcome, within confidentiality limits.

### 6. OVERSIGHT AND GOVERNANCE

The Board of Directors has the ultimate responsibility for oversight of this policy and ensures its effective implementation. The Whistleblower Protection Officer, appointed by senior management, is responsible for handling reports, safeguarding confidentiality, and monitoring compliance with this policy.



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### 7. RIGHTS AND RESPONSIBILITIES

- Whistleblower Rights: Individuals acting in good faith will not be penalized or disadvantaged.
- **Responsibilities of Management:** Managers are responsible for fostering a culture where employees feel safe to raise concerns without fear of retaliation.

### **8. POLICY REVIEW**

This policy will be reviewed periodically to ensure it remains current with industry practices, legal requirements, and organizational needs.

### **Effective Date:**

This policy is effective from 1st October 2024.