

LANKA ALUMINIUM INDUSTRIES PLC

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

1. INTRODUCTION

Lanka Aluminium Industries PLC ("the Company") is committed to conducting business with integrity and a zero-tolerance stance on bribery and corruption. This policy aims to ensure compliance with all applicable anti-bribery laws and to maintain ethical conduct in all interactions, domestically and internationally.

2. PURPOSE

This policy is designed to:

- Establish the Company's commitment to zero tolerance for bribery and corruption.
- Define responsibilities for all stakeholders, including employees, contractors, and business partners.
- Provide guidance to detect, prevent, and address instances of bribery and corruption.

3. SCOPE AND APPLICABILITY

This policy applies to:

- All employees, directors, officers, and agents of the Company.
- Any third parties conducting business on behalf of the Company, including suppliers, contractors, and representatives.

4. POLICY STATEMENTS

- **4.1 Zero Tolerance:** The Company strictly prohibits all forms of bribery and corruption. Engaging in any form of bribery, including offering or accepting anything of value to gain business advantages, is prohibited.
- **4.2 Compliance:** The Company complies with Sri Lanka's Anti-Corruption Act and relevant international anti-bribery laws.
- **4.3 Reporting Obligations:** All employees and third parties are required to report suspected bribery or corruption.

LANKA ALUMINIUM INDUSTRIES PLC

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

5. DEFINITIONS

- **Bribery:** Offering, giving, receiving, or soliciting any item of value to influence a person's actions in a position of trust.
- **Corruption:** Abuse of entrusted power for private gain, directly or indirectly.

6. RESPONSIBILITIES

- **Employees:** All employees are responsible for understanding and complying with this policy, avoiding conflicts of interest, and reporting suspected violations.
- **Management:** Managers must enforce and exemplify compliance, providing necessary training and support to employees.
- **Third Parties:** Third parties must agree to comply with this policy as part of their contractual obligations to the Company.

7. PERMITTED AND PROHIBITED CONDUCT

- **Gifts and Hospitality:** The Company has a "No-Gift Policy." Limited exceptions may apply for customary tokens of appreciation with prior approval.
- **Facilitation Payments:** Facilitation payments are strictly prohibited unless required for safety reasons. Any such payments must be reported immediately.
- **Political Contributions:** The Company does not support political contributions or donations to any political campaigns or entities.

8. DONATIONS AND SPONSORSHIPS

Donations or sponsorships must be for genuine charitable purposes. All donations should be pre-approved to ensure they are not used to gain improper business advantages.

9. CONFLICT OF INTEREST

Employees must avoid situations where personal interests could conflict with those of the Company. Any potential conflicts must be disclosed to the appropriate manager or compliance officer.

LANKA ALUMINIUM INDUSTRIES PLC

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

10. RECORD-KEEPING

All transactions must be accurately recorded. No accounts are to be kept off-book to facilitate or conceal payments. The Company maintains a gift register for any acceptable tokens of appreciation.

11. WHISTLEBLOWING AND REPORTING CHANNELS

The Company encourages a culture of transparency and accountability. Any employee or third party may report concerns about bribery and corruption through the Company's Whistleblower Policy. Reports will be treated confidentially, and retaliatory actions are prohibited.

12. TRAINING AND COMMUNICATION

The Company provides regular anti-bribery and anti-corruption training for employees. Third parties will be informed of their obligations under this policy through contractual agreements.

13. DISCIPLINARY ACTIONS FOR NON-COMPLIANCE

Non-compliance may result in disciplinary action, including termination and potential legal proceedings. The Company reserves the right to terminate relationships with third parties violating this policy.

14. POLICY REVIEW AND UPDATES

This policy will be reviewed annually and updated as necessary to reflect changes in laws or business practices.

Effective Date:

This policy is effective from 1st October 2024.