

# **SINGER FINANCE**

## **POLICY ON ANTI-BRIBERY AND CORRUPTION**

**In Compliance with CSE Listing Rule 9.2.1 (l)**

**VERSION 1.0**

## Table of Contents

DOCUMENT AND VERSION CONTROL .....	3
1. PURPOSE .....	4
2. SCOPE .....	4
3. DEFINITION OF BRIBERY AND CORRUPTION .....	4
4. PROHIBITION AND PREVENTION MEASURES .....	4
5. CONSEQUENCES FOR NON-COMPLIANCE .....	5
6. REPORTING VIOLATIONS .....	5
7. TRAINING .....	6
8. REGULATORY REQUIREMENTSs .....	6
9. REVIEW .....	6

**SINGER FINANCE (LANKA) PLC**  
**POLICY ON ANTI-BRIBERY AND CORRUPTION**

---

**DOCUMENT AND VERSION CONTROL**

**Document Type**  
Policy document

**Document Name**  
Policy on Anti-Bribery and  
Corruption

**Document No**  
CSE Policies - 13

**Version/Revision**  
1.0

**Written by**  
Thushan Amarasuriya  
CEO

**Contents examined by**  
Nadeesha De Silva  
Compliance Officer

**Released by**  
Lasitha Dias  
Company Secretary

**Approved by the  
Board on**  
24/09/2024

## **1. PURPOSE**

This policy outlines the fundamental principles and responsibilities for preventing and managing the risks of bribery and corruption within the company.

The Company has zero tolerance for any form of bribery and corruption, viewing any such acts as a serious compromise of its integrity and reputation.

This specifies that all employees have a duty to prevent and address bribery and corruption in their respective roles. However, this Policy is distinct from the company's Anti-Money Laundering and Combating the Financing of Terrorism Policy, which deals with customer accounts, and includes measures against fraud and corruption by customers.

## **2. SCOPE**

This policy applies to all company, including management and staff in any employment status (permanent, probationary, temporary, or contractual positions), and extends to all departments and branches. It also covers vendors, suppliers, service providers, consultants, representatives, and others who work with or for the company.

## **3. DEFINITION OF BRIBERY AND CORRUPTION**

**Bribery** - Includes any improper transaction of value between individuals and the company representatives to influence decisions or gain unfair advantages. This can be in the form of money, gifts, hospitality, employment offers, or any other valuable item.

**Corruption** - Misuse of power, position or trust for personal gain, often involving bribery or accepting rewards that compromise one's duties.

## **4. PROHIBITION AND PREVENTION MEASURES**

Employees are strictly forbidden from:

- Engaging in any form of bribery, including offering, promising, or accepting bribes, kickbacks, or secret commissions, regardless of the amount, to gain an improper advantage;
- Making payments to expedite routine actions;
- Not taking adequate measures when recruiting candidates reportedly having contacts with public officials;
- Offering gifts or benefits when it is known or suspected that the recipient is legally or otherwise obligated to refuse them;

**SINGER FINANCE (LANKA) PLC**  
**POLICY ON ANTI-BRIBERY AND CORRUPTION**

---

- Accepting a gift or hospitality from a third party if it is known or suspected that it is offered or provided with the intention of influencing improper performance;
- Making donations or sponsorships to third parties, not directly to the organizing bodies;
- Transacting with business partners or third parties who may use the funds for bribery or other improper payments;
- Altering financial records or accounts—accurate documentation of all transactions is mandatory;
- Participating in corrupt practices, including influencing others improperly through the exchange of benefit;
- Committing fraud by misrepresentation or omission to gain a benefit or avoid an obligation;
- Colluding with others to achieve improper goals, including influencing another party improperly;
- Obstructing investigations by destroying or altering evidence or providing false statements;
- Coercing individuals, directly or indirectly, to influence their actions improperly;
- Hindering another employee's ability to perform their duties due to corrupt influence;
- Authorizing or engaging in any conduct that contradicts this policy.

## **5. CONSEQUENCES FOR NON-COMPLIANCE**

The Company under no circumstances shall tolerate an employee engaging in any act of bribery or corruption. The Company will vigorously enforce compliance with this Policy and any violations of the Policy may result in disciplinary action including termination of employment and reporting to law enforcement for legal proceedings.

Employees are required to fully and transparently collaborate with any internal investigations into purported or potential corruption or policy breaches. Failure to cooperate or providing false information is considered a breach of this policy.

## **6. REPORTING VIOLATIONS**

Employees at all level of the company are responsible to promptly report any known or suspected violations of this policy, anti-corruption standards, or laws, as well as any improper financial requests or advantages, to their Branch Manager or Head of the Department.

Employees who are uncomfortable reporting to the head of the department / Branch Manager may contact any of the higher authorities listed below with whom they feel comfortable.

- Assistant General Manager -HR
- Manager Internal Audit

**SINGER FINANCE (LANKA) PLC**  
**POLICY ON ANTI-BRIBERY AND CORRUPTION**

---

- Compliance Officer
- Chief Operating Officer, or
- Chief Executive Officer

Procedures have been established to guarantee that incidents are recorded, examined, and addressed properly. There are also systems to maintain the confidentiality of grievances as much as possible, in accordance with legislative protections.

In the event a significant bribery or corruption incident occur, it will be reported to the Board by either the Internal Audit Department or the HR Department.

## **7. TRAINING**

The company will ensure that employees are adequately informed about the requirements of this Policy. This Policy will be hosted in the website of the company - [www.singerfinance.com](http://www.singerfinance.com) as well as in the company's Learning Management System. Any questions or clarifications in relation to this Policy should be directed to the Compliance Officer.

## **8. REGULATORY REQUIREMENTSs**

The company will comply with all applicable regulatory requirements related to Bribery and Corruption.

## **9. REVIEW**

This policy will be reviewed and approved by the Board once in two years.



**Lasitha Dias**  
**Company Secretary**



**Nadeesha De Silva**  
**Compliance Officer**



**Eraj Fernando**  
**Head of Finance**



**Thushan Amarasuriya**  
**CEO**