

**ASSOCIATED MOTOR FINANCE
COMPANY PLC
WHISTLE BLOWING POLICY**

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Policy

1. Introduction

In continuance of the Associated Motor Finance Company PLC (hereinafter referred to as "Organization") ongoing commitment in maintaining high standards of Corporate Governance, the management wishes to extend the policy to another important area, with the introduction of a "**WHISTLE BLOWING POLICY**" (WBP). This is intended to serve as a communication channel, introduced as an integral part of containing corporate fraud and improving risk management.

All members of the staff (Staff– Employees working at a branch or department) are under an obligation, which is implied in their contract of employment, to give honest and faithful service to the organization.

The WBP is for all staff members of the organization, and it recognizes the duty of each and every staff member, to take action about any genuine concern they may have in relation to activities which they feel are wrongful or illegal or otherwise harmful to the interests of the organization, its employees, customers and all other stakeholders.

The WBP will allow any staff member who has a genuine concern on an existing or potential wrong doing, done by any person within the organization, to write in voluntarily subject to conditions stipulated under sub-headings 'Scope of this scheme', 'Who can raise concerns', and 'Procedure', and bring such concerns to the notice of an Independent designated authority.

The organization is committed to maintain absolute confidentiality about the information provided and the informant, and to ensure that such genuine concerns of employees on perceived wrong doings are taken seriously and investigated. Such disclosures will enable the organization to investigate and deal with such matters early, before it results in a loss to the organization. In fact, this procedure will be operated for and on behalf of the Company Audit Committee reporting directly to the Board of Directors of the organization.

2. Scope of the scheme

Employees are encouraged to raise any matter which they genuinely believe, constitute a potential or existing wrong doing(s). The concerns on the wrongdoing can be raised on any person or persons within the organization, if such person is in employment with the organization or relating to a supplier or someone doing business with the organization.

The scheme is designed to deal with concerns raised in relation to the specific issues which are in the interest of the organization, as detailed below. Please note that this scheme will NOT apply to matters relating to an employees' own conditions and personal grievances, concerning an individual's terms and conditions of employment, promotions, other career related matters etc, or other aspects of the working relationship or disciplinary matters, which are not issues that can be raised through the WBP. Those matters should be raised under the normal reporting line and Human Resources.

The specific concerns that may be dealt under the scheme include:

- A criminal offence
- Breach of the standing instructions.
- Failure or breach to comply with legal obligations or with the status, instructions of the organization, the Central Bank of Sri Lanka and Securities and Exchange Control Department.
- Financial or Non-financial malpractices or impropriety or fraud.
- Academic or professional malpractice.
- A risk and danger to the health and safety of any individual.
- Any fraudulent or malicious activity involving organization's assets or environmental damage.
- Improper conduct or unethical behavior.
- Attempts to suppress or conceal any information relating to any of the above.
- Any other matter/s which an employee feels is / are important for disclosure, which may have a negative effect or potentiality of a negative effect to the Company, and not covered above.
- Collusion with competitors

3. Who can raise concerns

Any member of the staff who has reasonable belief that there is serious malpractice relating to any of the matters specified above may raise concerns under the procedure detailed below. The issues raised may relate to another member of the staff or group of staff members.

The same procedure may also apply to any outside/external party such as customers, suppliers, contractors or stake holders to report any concern or complaint regarding matters listed above.

4. Protection for Whistle Blower

Concerns must be raised without malice and in good faith, and the person/s who raise/s the concern must reasonably believe that the information disclosed, and any allegations contained in it, are substantially true. The member who raises any concerns which he/ she believes to be substantially true, will not be penalized or suffer any adverse treatment for doing so, and under this procedure the Company gives the assurance to such employees that their identity and the source of information will be protected and respected at all times. A staff member who has been an accomplice to a fraud or any form of reprisal against anyone who in good faith has raised a concern is forbidden and will itself be regarded as a serious offence to be dealt with under disciplinary procedure. As well as Whistleblower that he or she revealed to other parties by himself or herself is not responsible by the company.

However, the management will ensure that any members of the staff who does not act in good faith or makes an allegation without having reasonable grounds for believing it to be substantially true, or makes it for personal gain, makes it maliciously, will be subject to disciplinary proceeding.

In view of the protection afforded to a member of the staff raising a bona fide concern, it is required that the individual or the team of individuals puts his/ her/ their name/s to any disclosure. The identity of the person raising the matter will be kept confidential, if so requested, for as long as possible, provided that this is compatible with a proper investigation.

5. Procedure

The employees' concerns on the actual/ potential wrong doing must be raised using any of the following methods within a reasonable time frame after the event is noticed.

- In writing and signed by the employee under private and confidential cover,
- By emailing,
- By calling on the phone number given in the section 9 of this policy.

Anonymous whistle blowers are generally not encouraged. However, if any person wishes to report a serious matter, such whistleblower may be doing so anonymously. Anonymous whistleblowers must provide sufficient corroborating evidence to justify the commencement of an investigation. Those anonymous complaints/ whistle blowing will be initially assessed by the Head of Internal Audit with the assistant of Audit Committee to ascertain whether such complaints have been made with reasonable grounds. Anonymous complaints/ whistle blowing with reasonable grounds will be investigated by Internal Audit Division with the approval of Audit Committee.

However, whistleblowers can report any matters regarding custodian of the policy (Head of Internal Audit) or any staff member of the custodian's department to the DCEO of the AMF.

The concerns should be addressed to contact details given below in section 9.

Such legitimate concerns received by above parties shall be directed to the Board Audit Committee through the Head of Internal Audit. The Board Audit Committee will decide on the best course of action to follow in dealing with such concerns, ensuring at all times the protection of the identity of the employees making the disclosure. The Chairman of the Audit Committee shall report to the Board of Directors, those concerns that he sees fit to be reported.

6. Process

The Head of Internal Audit will normally consider the information and decide if there is a prima-facie case to initiate investigations. It will depend on the nature of the matters raised. The investigations may be either done internally or referred for an independent investigator. If the Head of Internal Audit thinks that there are no valid grounds to initiate an investigation, he/she will then report the matter to Audit Committee, starting clearly why an investigation had not been commenced. The member who raised the concerns will also be informed of such decision simultaneously.

7. Investigation

The investigation will be conducted by the Head of Internal Audit or an officer appointed by him/her to do so. Official written records will be kept during all stages of the investigation. At the end of the investigation the investigator will submit a written report of his/ her findings to the person who appointed him/ her, giving his/ her observations with all relevant documents and records. All investigations conducted will be reported to the Chairman of the Audit Committee.

8. Monitoring and Review of Policy

The Board Audit Committee is responsible for the ownership and review of the policy with the involvement of Head of Audit. The policy needs to be reviewed annually and approved by the Board of Directors.

9. Contact details

Associated Motor Finance Company PLC		
Designation	Name	Contact details
Deputy CEO	Chandrin Fernando	Address; No,146, Havelock Road, Thibirigasyaya, Colombo 05 Email; mdAMF2019@gmail.com TP; +94 115 553 663

10. Whistle Blower Form

Whistle Blower Form	
Have you experienced or observed any unethical or unprofessional conduct on the part of any of our staff?? Please fill the form and let us know (your confidentiality wishes shall be fully respected)	
Name of Officer (S) involved:	
Nature of Conduct	
Comments	
Would you like to be contacted	<input type="checkbox"/> YES <input type="checkbox"/> NO
Your Name	
Email Address	
Contact No	

11. Review Cycle

Review Cycle of the Whistle Blowing Policy of Associated Motor Finance Company PLC is one year.