Policy on Anti-Bribery and Corruption

Version: RPC/P12/Sep24

RICHARD PIERIS & CO. PLC

1. Introduction

The Policy on Anti-Bribery and Corruption is established to promote ethical business practices and ensure that Richard Pieris & Company PLC operates with integrity, transparency, and accountability. This policy outlines the company's commitment to preventing bribery, corruption, and any form of unethical conduct. It applies to all employees, directors, and third-party associates, reinforcing a zero-tolerance approach to any actions that could undermine the company's reputation or legal obligations. By implementing this policy, Richard Pieris & Company PLC aims to uphold the highest standards of compliance with local and international anti-corruption laws.

2. Purpose and Scope of the Policy

The Policy on Anti-Bribery and Corruption aims to ensure full compliance with the revised Section 9 of the Corporate Governance Rules (9.2) set by the Colombo Stock Exchange (CSE) and the Anti-Corruption Act No. 09 of 2023 in Sri Lanka. Richard Pieris & Company PLC is committed to upholding the highest standards of integrity, transparency, and ethical conduct in its business operations. This policy establishes clear guidelines for preventing, detecting, and addressing bribery and corruption within the company. It ensures that all employees, directors, and associated parties adhere to both local and international anti-corruption laws and regulations, thereby safeguarding the company's reputation and long-term sustainability.

3. Policy Details

3.1. Definition of Bribery and Corruption

- **Bribery** refers to offering, giving, receiving, or soliciting something of value to influence the actions of an individual or entity in a position of power or trust.
- **Corruption** is any dishonest or unethical behavior aimed at personal or corporate gain, including fraud, embezzlement, or misuse of authority.

3.2. Responsibilities

- **Board of Directors and Senior Management:** The Board is responsible for ensuring compliance with this policy and overseeing its implementation. Senior management must promote a culture of integrity and take proactive steps to prevent corruption in all business operations.
- **Employees and Third Parties:** All employees and third parties acting on behalf of the company are required to follow this policy and report any suspicious activities or potential violations through the company's whistleblowing channels.

3.3. Reporting and Whistleblowing

Richard Pieris & Company PLC encourages all employees, business partners, and stakeholders to report any suspected cases of bribery, corruption, or violations of this policy. The company's whistleblowing system allows for confidential reporting and ensures that whistleblowers are

protected from retaliation. All reports will be investigated thoroughly, and appropriate action will be taken, including disciplinary measures or legal proceedings if necessary.

3.4. Penalties for Non-Compliance

Any violation of this policy may result in disciplinary action, including dismissal, contract termination, or legal action. Non-compliance with the Anti-Corruption Act No. 09 of 2023 may also result in severe legal penalties, including fines and imprisonment for individuals involved in corrupt activities.

4. Review and Amendments

This policy will be reviewed annually to ensure that it remains current with changes in laws and best practices. Any amendments to the policy must be approved by the Board of Directors.