
	THE KANDY HOTELS COMPANY (1938) PLC - POLICY DOCUMENT	
	POLICY FOR ANTI – BRIBERY AND ANTI- CORRUPTION	
	Effective from 30.09.2024	Document No: PO- KHC/2024/012/VERSION 1
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Scope	<p>The Anti-Bribery and Anti-Corruption Policy (the ‘Policy’) sets forth principles aimed at combating bribery and corruption while effectively managing associated risks within The Kandy Hotels Company (1938) PLC (the ‘Company’ or ‘KHC’). This Policy applies to the Company, its company personnel (as defined below), and third parties (as defined below), requiring them to commit to fighting all forms of bribery and corruption in transactions involving the Company.</p> <p>This strictly prohibits any Company personnel from paying or accepting bribes to gain any improper business advantage, and any corrupt behavior by Company personnel is entirely forbidden.</p> <p>The policy has been formulated in compliance with Rule 9.2.1(l) of the listing rules of the Colombo Stock Exchange (‘CSE’), and the Company is dedicated to promoting and ensuring compliance. All employees are responsible for preventing and addressing bribery and corruption within their respective roles and responsibilities.</p>	
Policy measures	The Company establishes and maintains a zero-risk appetite toward any form of bribery or corrupt behavior, considering it a threat to its integrity and reputation in the business environment.	
Definitions	The Company	The Kandy Hotels Company (1938) PLC
	Policy	Anti- Bribery and Corruption Policy of The Kandy Hotels Company (1938) PLC
	Board	The Board of Directors of The Kandy Hotels Company (1938) PLC
	Corporate website	www.chcplc.com
	Bribery	This involves offering, promising, giving, accepting, authorizing, agreeing, receiving or soliciting of an advantage or something of a value (gratification) as an inducement for action which is illegal, unethical or breach of trust.
	Corruption	This is the abuse of entrusted power, position and/or trust to get an improper advantage or gain, giving or receiving of any gratification or reward of any value for performing a task in relation to the person’s job profile/ job description.
	Company personnel	All Directors, Consultants, Management, Officers and Employees (including permanent, probation, temporary or contract staff) of the Company and individuals (including trainees, seconded staff, casual workers, and interns)
	Third parties	This includes but not limited to customers, business partners, contractors, third party agents, referrers, persons and in fiduciary capacity, suppliers and any joint venture partners in any operation of the Company
	Breach	Non-compliance with any of the requirement contained in this policy.

Reviewed & Confirmed		Approved by	
Shalike Karunasena	Director / Group CFO	Board of Directors	


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Responsibility	This policy is regularly reviewed by the Board of Directors (the ‘Board’) to ensure compliance with regulations, as well as its effectiveness and relevance. Any necessary modifications are made to address weaknesses/gap, development in the industry, changes in law/regulations or improvements in the policies/procedures.
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Anti- Bribery and Anti- Corruption Principles

1.1	The Company ensures compliance with anti-corruption laws breached and ensures that reputation of the Company is not damaged. Company personnel must not engage in any of the following activities in their personal capacity to circumvent the requirements of this Policy.
1.2	No Company personnel will face penalties or other negative consequences for refusing to pay bribes or participate in any conduct that would violate this Policy, even if such refusal may impact the Company's business.
1.3	<p>All Company Personnel must not:</p> <ul style="list-style-type: none"> ▪ Pay, offer, promise, or accept, directly or indirectly, any bribe, kickback, secret commission, or other form of improper payment (no matter how small) in order to obtain any improper business or other advantage for the Company, themselves, or others. ▪ Make facilitation payments. Facilitation payments are typically low-value payments made to a public official to expedite or facilitate the performance of a routine governmental action. ▪ Provide or accept benefits, including gifts, hospitality, entertainment, meals, travel/accommodation, training, or other items of value that violate the standards outlined in the related policies. ▪ Offer or give gifts or benefits in circumstances where it is known or suspected that the recipient cannot accept them under the law or due to any duties or obligations they owe to others. ▪ Make charitable or community donations or sponsorships that contradict Company policy. ▪ Enter into or continue a business relationship with a third party unless satisfied that the third party will act in accordance with this Policy. ▪ Engage with or make a payment to a business partner or any other third party while knowing or suspecting that they may use or offer all or part of the payment as a bribe, kickback, secret commission, or other form of improper payment. ▪ Falsify or misdescribe any book, record, or account related to the Company's business. All receipts and expenditures must be accurately supported by proper documentation. ▪ Engage in corrupt practices, including offering, giving, receiving, or soliciting, directly or indirectly, anything of value to improperly influence another person's actions. ▪ Engage in fraudulent practices by acting or failing to act, including misrepresenting or misleading a person to obtain a financial or other benefit or to evade an obligation. ▪ Engage in collusive practices, which involve an arrangement between two or more parties aimed at achieving an improper purpose, including improperly influencing another party's actions. ▪ Engage in obstructive practices by deliberately destroying, falsifying, altering, or concealing evidence material to an investigation or making false statements to investigators.

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Shalike Karunasena	Director / Group CFO	Board of Directors	

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	<ul style="list-style-type: none"> ▪ Engage in coercive practices that would directly or indirectly impair, harm, or threaten to impair or harm any person or their property to improperly influence that person’s actions. ▪ Prevent, abate, or influence another staff member from performing their official duties due to corrupt conduct. ▪ Cause or authorize any of the above conduct or any other actions inconsistent with this Policy. ▪ Make political, charitable, or community donations or sponsorships that violate the Company’s policy.
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Reporting of breaches

2.1	The policy promotes the reporting of any suspected or actual bribery or corruption as soon as it is noticed. Please see the whistleblowing policy below for more details.										
	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Any reportable conducted by</th> <th style="text-align: left;">Reporting authorities</th> </tr> </thead> <tbody> <tr> <td>Chairman and the Board</td> <td>Senior Independent Director</td> </tr> <tr> <td>Any other director</td> <td>The Chairman of the Board</td> </tr> <tr> <td>Members of the corporate management</td> <td>The Chairman of the Audit Committee</td> </tr> <tr> <td>Any other employee</td> <td>Group Chief Financial Officer</td> </tr> </tbody> </table>	Any reportable conducted by	Reporting authorities	Chairman and the Board	Senior Independent Director	Any other director	The Chairman of the Board	Members of the corporate management	The Chairman of the Audit Committee	Any other employee	Group Chief Financial Officer
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Chairman and the Board	Senior Independent Director										
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Any other employee	Group Chief Financial Officer										
2.2	If a staff member feels uncomfortable reporting an incident to their immediate supervisor, they are encouraged to approach one of the designated reporting authorities they feel comfortable with. The process ensures that complaints are recorded, investigated, and appropriate actions are taken. Complaints are handled confidentially to the greatest extent possible, in line with legislative procedures.										

Breach of Policy

3.1	Breaches of this policy may lead to disciplinary action, legal repercussions, damage to reputation, and financial losses. Significant breaches should be reported to the Board of Directors.
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Exceptions

4.1	Company personnel will not be penalized for making a payment or providing a benefit in circumstances where coercion against themselves or another person if the payment or benefit is not provided. Personnel must immediately reach out to the Head of Legal and Administration and promptly document the incident.
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Publication of the policy

5.1	The policy is hosted on the Company’s corporate website, and the Company will ensure that personnel are adequately informed about its requirements. Any clarifications regarding the policy should be directed to the Group Chief Financial Officer.
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Policy Output	Investigation on the concern raised & necessary disciplinary action taken if required.
Policy Records	Policy for Ant- - Bribery and Anti- Corruption

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