

Whistleblowing policy (confidential reporting)

1. What is Whistleblowing?

In this policy ‘Whistleblowing’ means the reporting by employees of suspected misconduct, illegal acts or failure to act according to Hemas Way (Code of Conduct).

The aim of this Policy is to encourage employees and others who have serious concerns about any aspect of Hemas to come forward and voice those concerns.

Employees are often the first to realise that there may be something seriously wrong within Hemas. ‘Whistleblowing’ is viewed by Hemas as a positive act that can make a valuable contribution to the efficiency and long-term success of Hemas. It is not disloyal to colleagues or Hemas to speak up. Hemas is committed to achieving the highest possible standards of service and the highest possible ethical standards in public life and in all of its practices.

If you are considering raising a concern you should read this Policy first. It explains:

- the type of issues that can be raised
- how to raise a concern
- how the person raising a concern will be protected from victimisation and harassment, and
- what Hemas will do when an issue is raised

If you are unsure whether to use this Policy or want independent advice at any stage, you may contact your HR manager/Head of HR. He/she will give you confidential advice on how to raise a concern.

2. What is the aim of the Policy and when does it apply?

2.1. Aims of the Policy

The Policy is designed to ensure that you can raise your concerns about wrongdoing or malpractice within Hemas without fear of victimisation, subsequent discrimination and/or any disadvantage.

This Policy aims to:

- encourage you to feel confident in raising serious concerns at the earliest opportunity and to question and act upon concerns about practice
- provide avenues for you to raise those concerns and receive feedback on any action taken

- ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied
- reassure you that you will be protected from possible reprisals or victimisation if you have made any disclosure in good faith.

2.2. Scope of this Policy

This Policy is intended to enable those who become aware of wrongdoing in the Company affecting some other person or service, to report their concerns at the earliest opportunity so that they can be properly investigated, and remedial action taken, if required.

The Whistle Blowing Policy is not intended to replace the following procedures:

- If your concern relates to your own treatment as an employee, you should raise it under the existing grievance or harassment procedures
- If a client has a concern about services provided to him/her, it should be raised as a complaint to the Company.

2.3. What should be reported?

Any serious concerns that you have about service provision or the conduct of officers or members of Hemas or others acting on behalf of Hemas that:

- make you feel uncomfortable in terms of known standards;
- are not in keeping with the 'Hemas Way';
- fall below established standards of practice; or
- are improper behaviour.

These may relate to:

- conduct which is an offence or a breach of the law (e.g. when a criminal offence has been committed or failing to comply with any other legal obligation)
- disclosures related to miscarriages of justice
- racial, sexual, disability or other discrimination
- health and safety of the public and/or other employees
- damage to the environment
- unauthorised use of company funds or other assets
- possible fraud and corruption
- neglect or abuse of clients/suppliers other members of the society , or
- other unethical conduct.

This list is not exhaustive.

3. Protecting the Whistleblower

3.1. Your rights

This policy has been written to take account the need to protect employees making disclosures about certain matters of concern, without allowing them to be victimised on the basis that they have made a disclosure.

Rarely, a case might arise where it is the employee (the whistleblower him/herself) that has participated in the action causing concern. In such a case it is in the employee's interest to report the matter as soon as possible. Hemas cannot promise not to act against such an employee, but the fact that they came forward may be taken into account.

3.2. Harassment or Victimisation

Hemas is committed to good practice and high standards and to being supportive of you as an employee.

Hemas recognises that the decision to report a concern can be a difficult one to make. If you honestly and reasonably believe what you are saying is true, you should have nothing to fear because you will be doing your duty to your employer, your colleagues and those for whom you are providing a service.

Hemas will not tolerate any harassment or victimisation of a whistleblower (including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith and will treat this as a serious disciplinary offence which will be dealt with under the disciplinary rules and procedure.

3.3. Support to you

Throughout this process:

- you will be given full support from senior management
- your concerns will be taken seriously, and
- the Company will do all it can to help you throughout the investigation.

3.4. Confidentiality

All concerns will be treated in confidence and every effort will be made not to reveal your identity if that is your wish. If disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of your disclosure without your help, so you may be asked to come forward as a witness. If you agree to this, you will be offered advice and support.

3.5. Anonymous Allegations

This Policy encourages you to put your name to your allegation whenever possible. If you do not tell us who you are it will be much more difficult for us to protect your position or to give you feedback.

Concerns expressed anonymously are much less powerful but they may be considered depending on:

- the seriousness of the issue raised
- the credibility of the concern, and
- the likelihood of confirming the allegation from other sources.

3.6. Untrue Allegations

If you make an allegation in good faith and reasonably believing it to be true, but it is not confirmed by the investigation, the Company will recognise your concern and you have nothing to fear. If however, you make an allegation frivolously, maliciously or for personal gain, appropriate action that could include disciplinary action, may be taken.

4. Raising a Concern

4.1. Who should you raise your concern with?

This will depend on the seriousness and sensitivity of the issues involved and who is suspected of the wrongdoing. You should normally raise concerns in the following manner:

- A. Address your concerns to : **Mr. Imtiaz Esufally** or **Dr. Anura Ekanayake**
- B. If by postal mail to : **‘Hemas House’, No. 75 Braybrooke Place, Colombo 02, Sri Lanka.**
- C. If by e-mail : **ireport@hemas.com**

4.2. How to raise a concern

You will need to provide the following information when you raise a concern:

- the nature of your concern and why you believe it to be true
- the background and history of the concern (giving relevant dates).

Although you are not expected to prove beyond doubt the truth of your suspicion, you will need to demonstrate to the person contacted that you have a genuine concern relating to suspected wrongdoing or malpractice within Hemas and there are reasonable grounds for your concern.

You may wish to consider discussing your concern with a colleague first and you may find it easier to raise the matter if there are two (or more) of you who have had the same experience or concerns.

5. What Hemas will do

Hemas will respond to your concerns as quickly as possible. Please do note that acknowledging your concern will not amount to accepting it as fact. It means that the concern you have raised will be looked into.

In order to be fair to all employees, including those who may be wrongly or mistakenly accused, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

The investigation may need to be carried out under terms of strict confidentiality, i.e. by not informing the subject of the complaint until (or if) it becomes necessary to do so. In certain cases however, such as allegations of ill treatment of others, suspension from work may have to be considered immediately.

Where appropriate, the matters raised may:

- be investigated by management, internal audit, or through the disciplinary/grievance process
- be referred to the external auditor
- form the subject of an independent inquiry
- be referred to an appropriate external authority

Within ten working days of a concern being raised, your concern will be acknowledged.

The amount of contact between you and the officers considering the issues will depend on the nature of the matters raised, the potential difficulties involved and the clarity of your information.

You need to be assured that your disclosure has been properly addressed. Unless there are any legal reasons why this cannot be done, you will be kept informed of the outcome of any investigation and in the event the allegations are not substantiated at any preliminary stage of the investigation, you will be informed as to why the investigation was not pursued with.

6. Review of the Policy

The Company's Board will review this Policy periodically.