

# WHISTLEBLOWING POLICY

Revision No.	Effective Date	Description Change	Policy Owner
Version: 1.0.1	Effective Date: 02/01/2017	Initial Version	HR Division
Version: 1.0.2	Effective Date: 20/05/2022	Amended the version and template	HR Division
Version: 1.0.3	Effective Date: 12/07/2023	Added the contact details of Chairperson of BAC	HR Division
Version: 1.0.4	Effective Date: 27/08/2024	Additional clauses and content change	HR Division
Version: 1.0.5	Effective Date: 04/12/2024	Content change	HR Division

## **1.1 Scope**

The company is committed to ensure its business and operations are conducted in an ethical, moral and legal manner. In line with this commitment, CDB has put in place the Whistleblowing Policy (WBP) to provide an avenue for all staff, interns, consultants, contractors, vendors, suppliers and/or customers to disclose any alleged illegal, unethical, questionable practices or improper conduct committed or about to be committed within the company. The company encourages any employee who suspects wrongdoing at work, whether by his management, peer, or another employee to raise his/her concern under the whistleblowing procedure. CDB will also be open to complaints, suggestions or grievances. Concerns raised will be investigated properly and the identity of the person raising the concern will be kept confidential. Such information will be reviewed by the Board Audit Committee (BAC) - Chairperson once in two months. If any serious matter arises, decision will be taken immediately.

## **1.2 General**

Whistleblowing policies are generally intended to make it easier for members of staff to be able to report irregularities in good faith, without having to fear that their action may have adverse consequences.

CDB's reputation and organisational integrity are key requirements to operate successfully in financial services industry. Failing to meet these requirements would violate CDB's business principles and may expose CDB and its employees to possible regulatory and/or criminal liability.

The Whistleblowing Policy is considered as a key element for safeguarding the company's integrity. It is aimed at enhancing the company's transparency and underpinning its system for combating practices that might damage its activities and reputation. Protecting the integrity and reputation of the CDB requires the active support of all members of the Company's staff, who are required to report incidents of suspected fraud, corruption, collusion and coercion, and other serious infringements of the rules and policies in force at the Company.

Members of staff must also cooperate in investigations into such incidents. By creating an environment of trust and maximum protection for the members of its staff and stakeholders, CDB wants to encourage them to cooperate in full. Putting in place arrangements will ensure that whistle blower or members of staff who report irregularities in good faith are afforded the utmost confidentiality, greatest degree of and most effective protection possible against any retaliation or reprisals, whether actual or threatened, as a result of their whistleblowing.

### **1.3 Applicability**

The procedure may be used by;

- a) All Staff
- b) Agency staff
- c) Temporary staff and Trainees
- d) Former employees throughout the group
- e) Consultants
- f) Vendors and Suppliers
- g) Contractors
- h) Customers

### **1.4 Procedure**

Anyone raising a concern in the genuine belief that wrongdoing has occurred, is occurring or may be about to occur will not be penalized or suffer any form of victimization even if, after full investigation, it is shown that he/she was mistaken. Any form of reprisal against anyone who in good faith has raised a serious offence will be dealt with under the disciplinary procedure.

### **1.5 Compliance Standards**

Examples of suspected wrongdoing that can be raised under this procedure include:

Breach of below Standards or of any legal obligation.

- a. Miscarriage of justice.
- b. Theft, Fraud & Misappropriation.
- c. Bribery and corruption.
- d. Damage to the environment caused by the company.
- e. Risk to health and safety.
- f. Improper accounting.

- g. Harassment of any form.
- h. Any other activity violating the Company Code of Conduct.
- i. This policy does not affect or change the CDB policies and procedures for individual employee grievances or complaints relating to job performance, terms and conditions of employment, which will continue to be administered and reviewed by the Human Resource Division.

## **1.6 Conditions**

- a) It is not intended for use where an employee is unhappy with his or her personal employment position, promotion, compensation and any other personal grievances.
- b) If the suspected wrongdoing involves the employee's line manager, the concern can be raised either through the HR Manager or Chief Support Services Officer or directly with the Chairperson of the Board Audit Committee (BAC).

- c) Anonymous (Concerns, Complaints, Grievance or Suggestions):

Under this policy concerns can be expressed anonymously. This Policy encourages stakeholders to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. The concern expressed anonymously will be addressed appropriately by CDB, but due consideration will be given to:

- a) The seriousness of the issue raised
- b) The credibility of the concern; and
- c) The likelihood of confirming the allegation from credible sources
- d) For the submission of anonymous Concerns, complaints, grievance or suggestions refer

## **1.7 Whistleblowing Procedure**

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### a) Whistleblowing reported to Chief Support Services Officer or HR Manager

Action	Timeline
Concerns forwarded to Chief Support Services Officer (CSSO) or HR Manager in writing will be acknowledged.	Within 3 Working Days from receiving the same.
The Chief Support Services Officer will report to the Chief Internal Auditor who would set up any further necessary investigation and the Chairperson of the BAC will also be informed in peroral. If the investigation shows there is a case to be answered by an employee, the Company's disciplinary rules and procedures shall be used.	Within 1 week from the date of receiving the complaint.
The findings will be reported to BAC by the Chief Internal Auditor.	Within 2 weeks from the date of receiving the facts from support service divisions.
The final decision will be taken by the BAC.	Within 1 week from the conclusion of the reporting.

### b) Whistleblowing directly reported to Chairperson of the BAC

Action	Timeline
Concerns/ incident reporting can be directly written or informed to the BAC - Chairperson.	
Decision will be taken by the Chairperson of the BAC and investigated based on the necessity and facts of the case.	Within 21 Working Days from receiving the same.

## **1.8 Contact Details**

### **a) Details of Chairperson of BAC**

- Name: Ms. Rajitha Perera
- Contact No: 0773061870
- Email: [pererarajitha27@gmail.com](mailto:pererarajitha27@gmail.com)

### **b) Details of Chief Support Services Officer (HR)**

- Name: Mrs. Nayanthi Kodagoda
- Contact No: 0773613145
- Email: [nayanthi@cdb.lk](mailto:nayanthi@cdb.lk)

### **c) Details of Senior - HR Manager**

- Name: Mrs. Narmadha Malwatte
- Contact No: 0768631563
- Email: [narmadha.malwatte@cdb.lk](mailto:narmadha.malwatte@cdb.lk)

## **1.9 Policy Review, Amendments, Custodian and Approval**

a) This Policy shall be reviewed yearly by the BAC, unless an earlier review is required in line with changes in the Company's business model, business environment, material changes in statutory regulations, and critical economic and other factors that will materially alter the profile of the Financial Institute.

b) The Human Resource Division shall be responsible for the ownership of the Company's Whistleblowing Policy. Custody of the Policy shall be domiciled with Human Resources.