
Sustainability Management System

Whistleblowing Policy

Proprietary Information of hSenid Business Solutions PLC.

This document contains information proprietary to hSenid Business Solutions PLC,
and may not be reproduced, disclosed or used in whole or in part without
permission in writing from hSenid Business Solutions PLC.

© 2025 hSenid Business Solutions PLC.

Document Control

Document properties

Owner	Manager - Internal Audit & Compliance
Version	1.0.1
Action date	18 th March 2025
Review frequency	Annually or whenever a significant change occurs
Document Name	Whistleblowing Policy
Document ID	HBS-L1-Whistleblowing Policy-V1.0.1
Classification	Internal

Version History

Version	Prepared By	Reviewed By	Authorised by	Action Date	Description
1.0.0	Manager – Internal Audit & Compliance	Management Committee	ESG Steering Committee	18 th March 2025	Initial Document
1.0.1	Manager – Internal Audit & Compliance	Manager - Legal	ESG Steering Committee	26 th March 2025	Approved Document

Distribution list

ESG Steering Committee

HR Department

Placement

SharePoint Doc share

Table of Contents

Introduction	4
Definitions	4
1. Purpose, Scope, and Users	7
2. What to Include When Reporting A Concern	9
3. Protection from Retaliation.....	9
4. Processing of Concerns Received.....	10
5. Oversight and Ownership of Policy	11

Whistle Blowing Policy

Introduction

At PeoplesHR, we are committed to maintaining a high standard of integrity, transparency, and accountability in all our business practices. The Whistleblowing Policy provides a clear and confidential mechanism for employees, contractors, and stakeholders to report concerns about unethical behavior, misconduct, violations of laws or regulations, or any activities that may undermine the values of our organization.

We encourage individuals to raise any concerns they may have without fear of retaliation or discrimination. This policy ensures that all reports are handled with respect, confidentiality, and in a fair manner, providing protection to whistleblowers. The aim is to uphold a culture of ethical conduct and compliance, ensuring that PeoplesHR continues to operate with the highest level of integrity, safeguarding the interests of our clients, employees, and the broader community.

Version – 1.0.0

Date – 18-03-2025

Legal Enforcement - PeoplesHR is committed to complying with all relevant laws and regulations in Sri Lanka, including the Bribery Act No.08 of 1973 (as amended), Anti-Corruption Act, No. 09 of 2023, the Prevention of Money Laundering Act No.05 of 2006, the Public Contracts Act, and the Code of Best Practice on Corporate Governance issued by the Institute of Chartered Accountants of Sri Lanka (CA Sri Lanka). In the event of serious misconduct, the company will report certain incidents to the relevant Sri Lankan regulatory bodies, such as the Securities and Exchange Commission and the Central Bank of Sri Lanka, as required by law, ensuring full compliance with local regulatory requirements.

Definitions

“Abuse of Power/Authority” mean the misuse of one’s position to exploit, manipulate, or unfairly influence others for personal gain or unethical purposes.

“Accounting, Internal Controls, and Auditing” mean Financial and operational systems designed to ensure transparency, compliance, and the prevention of fraud within an organization.

“Anti-Competition Practices” mean Unethical or illegal business behaviors, such as price-fixing or monopolistic strategies, that restrict fair market competition.

“Bribery & Corruption” mean Offering, giving, receiving, or soliciting something of value to influence decisions and gain an unfair business advantage.

“Code of Best Practice on Corporate Governance” means A framework established by the Institute of Chartered Accountants of Sri Lanka (CA Sri Lanka) to ensure ethical corporate management and accountability.

“Confidentiality” means the obligation to protect and restrict access to sensitive or private information related to whistleblowing reports and investigations.

“Conflict of Interest” means A situation where an individual’s personal interests interfere with their professional duties, potentially leading to biased decision-making.

“Data Confidentiality or Privacy Violations” mean Unauthorized access, sharing, or misuse of personal or sensitive data, breaching data protection laws or company policies.

“Fraud & Breach of Trust” means Any act of deception intended to result in financial or personal gain at the expense of another party, including misuse of company resources.

“Gifts, Sponsorships, Donations, Entertainment & Hospitality” means Items or benefits given in a business context, which must comply with ethical and financial limits to avoid conflicts of interest or bribery.

“Harassment, Bullying & Sexual Misconduct” means Unacceptable workplace behavior that creates a hostile, intimidating, or discriminatory environment for employees or stakeholders.

“Health, Safety, Security & Environment (HSSE) Violations” mean Actions or failures that compromise workplace health, safety, security, or environmental protection standards.

“Insider Trading” means the illegal practice of trading financial securities based on non-public, material information to gain an unfair market advantage.

“Malpractices” means Any improper, unethical, or negligent business conduct that violates company policies or regulatory laws.

“Misappropriation of Company Assets” means the unauthorized use or theft of company resources, including funds, equipment, or intellectual property, for personal gain.

“Misuse of Social Media or Business Communications” means the inappropriate use of digital communication channels that may harm the organization’s reputation or violate company policies.

“Money Laundering” means the process of concealing illicitly obtained funds to make them appear legitimate, which is prohibited under the Prevention of Money Laundering Act.

“Oversight and Ownership of Policy” means the governance and responsibility for maintaining and enforcing the Whistleblowing Policy, overseen by the Board of Directors and Audit Committee.

“Protection from Retaliation” mean Measures ensuring that individuals who report misconduct in good faith are safeguarded from workplace discrimination, demotion, or other forms of retaliation.

“Red Flags” mean Warning signs that may indicate unethical or illegal activity, such as excessive payments, unusual financial transactions, or conflicts of interest.

“Reporting Channel” means A secure and confidential platform that allows employees and stakeholders to report concerns related to misconduct, violations, or unethical behavior.

“Retaliation for Speaking Up” means Any adverse action taken against an individual for reporting a concern or participating in an investigation, which is strictly prohibited under this policy.

“Securities and Exchange Commission (SEC)” mean A regulatory body responsible for overseeing financial markets, ensuring transparency, and preventing fraudulent practices in Sri Lanka.

“Substance Abuse or Drugs in the Workplace” means the use of illegal or controlled substances that impair workplace safety and productivity, leading to disciplinary action.

“Theft or Misuse of Resources” mean Unauthorized taking, damaging, or improper use of company property, funds, or assets.

“Violation of Any Applicable Law or Regulation” means Any action that breaches local, national, or international laws, leading to potential legal consequences.

“Whistleblowing” means the act of reporting unethical, illegal, or harmful activities within an organization to authorities or designated compliance bodies.

“Workplace Behavior and People-Related Concerns” mean Issues related to professional conduct, employee relations, and adherence to company policies in the workplace.

1. Purpose, Scope, and Users

1.1 The purpose of this Whistleblowing Policy is to promote a culture of transparency, accountability, and ethical conduct within PeoplesHR. The policy provides a safe and confidential platform for employees, contractors, suppliers, business partners, clients, and other stakeholders to report any concerns related to misconduct, unethical behavior, violations of laws or regulations, or any actions that could potentially harm the integrity of the organization.

1.2 By encouraging the timely and responsible reporting of concerns, PeoplesHR aims to identify and address issues that may compromise the company's values, ensuring that the organization operates in full compliance with all applicable legal and regulatory requirements. The policy also ensures that those who report concerns are protected from retaliation, fostering an environment where individuals can speak up with confidence, knowing their concerns will be taken seriously and addressed promptly.

1.3 Through this policy, PeoplesHR seeks to safeguard its reputation, maintain trust with clients and stakeholders, and continually enhance its ethical standards, ensuring the long-term success and integrity of the company.

1.4 This Policy applies to all employees, contractors, suppliers, business partners, clients, and other stakeholders associated with PeoplesHR.

1.5 Employees, suppliers, business partners, contractors, customers, associates, and other stakeholders (collectively referred to as "Reporters") are encouraged to voice any concerns they have, provided that there is a reasonable belief or basis for the concern. The disclosure must be made in good faith, not for personal gain or motivated by malicious intent.

1.6 Reporters must ensure that rumors, hearsay, or unsubstantiated information are not the basis for raising concerns or whistleblowing.

1.7 Employees and stakeholders can report concerns related to PeoplesHR's business practices and compliance matters directly to the Legal Manager. Reports

should be made via IndependentAudit.committee@peopleshr.com to ensure appropriate review and action. All reports will be handled with strict confidentiality, and PeoplesHR ensures protection against retaliation for individuals reporting in good faith.

- (a) Abuse of Power/Authority
- (b) Accounting, internal controls, auditing, or IT security
- (c) Anti-competition practices
- (d) Breach of company policy
- (e) Bribery & corruption
- (f) Data confidentiality or privacy violations
- (g) Conflict of interest
- (h) Fraud & breach of trust
- (i) Gifts, sponsorships, donations, entertainment & hospitality
- (j) Harassment, bullying & sexual misconduct
- (k) Health, Safety, Security & Environment violations
- (l) Insider trading
- (m) Malpractices
- (n) Misappropriation of company assets
- (o) Misuse of social media or business communications
- (p) Money laundering
- (q) Retaliation for Speaking Up
- (r) Substance abuse or drugs in the workplace
- (s) Theft or misuse of resources
- (t) Violation of any applicable law or regulation
- (u) Workplace behavior and people-related concerns

This channel should not be used for customer service complaints or inquiries about the services provided by PeoplesHR. For such concerns, please contact the relevant PeoplesHR team or visit our website for more information.

2. What to Include When Reporting A Concern

- a. Concerns should be raised via the official reporting channel, which is available 24 hours a day, 7 days a week, and can be used by employees, suppliers, business partners, contractors, customers, associates, and other stakeholders associated with PeoplesHR.
- b. When using the official reporting channel, the Reporter is required to provide as much factual detail as possible, including the background or nature of the concern, when and where the incident occurred, any supporting evidence (if available), and the persons involved, including any witnesses. While the Reporter is encouraged to provide their name and contact information, they may choose to remain anonymous if preferred.
- c. PeoplesHR will treat the confidentiality of the Reporter and the information disclosed with the utmost care. If the Reporter chooses to disclose their identity, only those directly involved in the investigation (such as the Administrators of the reporting channel, the Investigator, and authorized personnel) will have access to their details. PeoplesHR will not disclose the Reporter's identity to any other party unless:
 - (a) PeoplesHR is legally obligated to disclose the Reporter's identity;
 - (b) Disclosure is required when reporting to the police, relevant regulatory bodies, or courts;
 - (c) Disclosure is necessary to prevent or reduce a threat to the Reporter's health, safety, or welfare;
 - (d) The Reporter gives consent for their identity to be disclosed.

3. Protection from Retaliation

- a. PeoplesHR is committed to protecting, within reason and available means, anyone who reports concerns in good faith, as well as those who participate in or investigate, from retaliation. Investigators will inform all involved parties about this commitment and report any perceived retaliation.
- b. No individual should retaliate against someone who reports concerns or assists in an investigation. If retaliation is experienced, the affected individual must file a new report using the same official channel, providing factual information or documentation to substantiate the claim. Any person found guilty of retaliation, regardless of their role, will be subject to disciplinary action.

- c. If the individual who reported the concern is implicated in their own conduct within the report, they will not be exempt from investigation, disciplinary action, criminal prosecution, or civil liability. The same applies to anyone assisting in the investigation. However, PeoplesHR will consider the disclosure and cooperation with the investigation when determining any necessary actions.

4. Processing of Concerns Received

- a. Concerns raised via the official reporting channel will be received by the Administrators of the reporting channel, which may include key personnel such as the Chief Internal Auditor of PeoplesHR, the Head of Internal Audit, and other relevant departments.
- b. The Administrators will assess the concern based on the provided details, such as the nature of the concern, when and where the alleged misconduct occurred, details of the individuals involved, witnesses, and any supporting evidence.
- c. Employment-related grievances will be referred to the Human Resources department to be addressed in accordance with their internal policies and procedures.
- d. If the reported concern warrants an investigation, the Administrators will assign an Investigator to conduct the inquiry in a fair, objective, and confidential manner, ensuring that it is completed within a reasonable timeframe depending on the complexity of the issue.
- e. Upon completion of the investigation, a report will be submitted to the relevant stakeholders within PeoplesHR, as well as any other relevant internal parties, according to the company's reporting governance.
- f. Any necessary disciplinary actions, including consequences for violations, will be taken in accordance with PeoplesHR's Disciplinary Policy and Code of Conduct. If a potential criminal offense is discovered, the case will be escalated to the relevant authority or regulatory body.
- g. The individual who reported the concern will receive updates on the status and/or progress of the investigation, in line with PeoplesHR's internal policies and procedures.
- h. All records of concerns raised (whether investigated or not) will be securely maintained by the Administrators of the reporting channel, along with any supporting documents, evidence, and corrective actions, for a minimum

period as required by the applicable laws in the regions where PeoplesHR operates.

- i. Any unauthorized disclosure of investigation results will be considered a serious violation and subject to disciplinary actions as outlined in PeoplesHR's Disciplinary Policy.

5. Oversight and Ownership of Policy

- a. The oversight responsibility for this Policy lies with the Board of Directors and the Audit Committee of PeoplesHR. The Internal Auditor (CIA) is responsible for the day-to-day administration and implementation of this Policy, reporting directly to the Board of Directors and Audit Committee. The effectiveness of this Policy will be regularly monitored and reviewed.
- b. The owner of this Policy is the Internal Auditor of PeoplesHR, who is responsible for incorporating any amendments or updates after obtaining approval from the Board of Directors. These amendments will be distributed to all relevant parties.

