POLICY ON ANTI-BRIBERY AND CORRUPTION | SINGHE HOSPITALS PLC Document Reference SHPLC 2024 Version 1.0

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Target	All staff		
Group			
Distribution	All staff		

The Board of Directors (the "Board") is unwavering in its commitment to fostering a strong Anti-Bribery environment, crucial to the success and integrity of the Company's performance and operations. This dedication is not only to safeguard the Company but also to uphold the trust of shareholders, investors, and the public. In crafting this policy, the Company adheres to the stringent standards set forth in Sections 9.2.1(a) and 9.5 of the Colombo Stock Exchange's Corporate Governance Rules.

Objectives

The Anti-Bribery Policy aims to:

- Promote the highest ethical standards and ensure a zero-tolerance stance on bribery and corruption.
- Strengthen the Company's operational performance by fostering transparency, accountability, and integrity.
- Guarantee that all financial inflows and outflows are managed with the utmost integrity, maximizing benefits for the Company while strictly adhering to ethical principles.

Anti-Bribery Guidelines

1. Strict Prohibition on Receiving Bribes:

No Director, Senior Manager, Manager, or staff member shall, under any circumstances, solicit or accept any form of bribe, whether monetary or nonmonetary, in connection with any of the Company's operations. Receiving bribes will be met with immediate disciplinary action, including potential termination and legal consequences.

2. Absolute Ban on Offering Bribes:

No Director, Senior Manager, Manager, or staff member shall offer or provide any form of bribe, either directly or indirectly, to any person or organization, to gain unfair business advantages or influence decisions. Offering bribes is considered a serious violation and will result in severe penalties, including legal action.

3. Clear Exemption for Legitimate Business Promotion:

Approved business promotion activities – such as authorized gifts, sponsorships, or entertainment – are not considered bribery, provided they strictly align with the Company's ethical policies and do not seek to improperly influence business outcomes. These activities must be transparent and subject to full disclosure.