



# Watawala Plantations PLC

## Policy Document

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<b>Prepared by</b>	Sustainability Team	<b>Date of Revision-</b>	-
<b>Approved by</b>	Chief Executive Officer	<b>Issue No</b>	01

### Escalating Ethical Issues

Adhering to the highest ethical standards and following the letter and spirit of this Code are critical responsibilities for all at Sunshine Holdings Group. We believe acting ethically is not only the right thing to do but also the right way to do business and to best serve our clients, business colleagues, shareholders, and communities. In this policy statement the company has articulated the high ethical standards it expects of its employees concerning such matters as conflicts of interest, payments outside entities and individuals, political contributions, and the maintenance of proper books, records and controls. If you have reasons to believe that any Sunshine employee, or anyone working on our company's behalf, may have engaged in misconduct, you have a duty to your colleagues and to Sunshine Group to promptly report your concerns. For any such irregularities the whistle blowing policy should be referred in order to take action.

All employees are expected to observe high standard of business ethics. They should not engage in any activity which would either conflict or interfere with the performance of the company responsibilities. Any investment, outside interest, or other activity that may appear to present such a conflict, either directly or indirectly through family members or others, should be avoided unless an exception is authorized, after full written disclosure of the fact, through normal administrative channels. The following are illustrative of kind of conflicts, which must be avoided unless specifically so authorized.

### Conflicts of Interest

#### Part 01

- a) Employees may not have any ownership interest in suppliers, customers or competitors.
- b) Employees may not seek to profit from confidential information or business opportunities that are available to them as a result of their position with the company.
- c) Employees may not act as a Director, Officer, Partner, Employee, Agent or Consultant for a supplier, customer or competitor.
- d) Employees may not receive gifts, loans, or favors from suppliers, others with whom the company does business, accept loans from financial institutions on prevailing terms and conditions.



e) Employees may not use company funds, facilities, or other resources for private purposes. In cases of suspected employee dishonesty, the separate procedure established by the company should be followed.

## Part 02

No staff member is permitted to engage in outside activities that conflict with the company's interest or undertake employment with any other person, company or organization without prior written authorization from the company.

- All employees shall not, without the prior written consent of the company publish or cause to be published any article, book, photograph or letter in any media.
- Give any interview or broadcast or deliver any lecture or speech on any matter which concerns his/her duties or the business of the company, or which in any event causes the company or its business associates, Managers or Board of Directors ridicule or contempt.
- Appear in television or other mass media advertisements.

### **Accepting Gifts and Benefits**

If the acceptance of an advantage or a gift could affect your objectivity or induce you to act against the company's interests, you should decline to accept such offers. Similarly, if acceptance could lead to questions or complaints of bias or impropriety, the offer should also be declined. Where an advantage or a gift is voluntarily given, you should disclose that to your immediate supervisor. Please take note of the following:

- a) The acceptance should not influence your performance;
- b) You should not feel obliged to do something in return for the offer, or;
- c) You are able to openly discuss the acceptance without reservation and;
- d) The nature (e.g. advertising or promotional gift or customary gift given during festive occasions) and the value of the gift or advantage are such that refusal could be seen as unsociable or impolite.



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## Compliance with the Company Code of Conduct

All employees should familiarize themselves with the content of and comply with the Company Code of Conduct. In case of doubt, you should consult the HR department. Anyone breaching the Code of Conduct will be disciplined, including termination of employment. Any complaints on possible breach of this Code can be made to your department head and will be treated promptly and fairly. This code will be reviewed and updated from time to time.

Reviewed and approved by

Date

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**Binesh N. Pananwala**  
CHIEF EXECUTIVE OFFICER