

Corporate Governance Policy on Whistleblowing

Revision history			
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1. Definitions and Abbreviations

Unless otherwise defined or the context otherwise requires, all capitalized terms used in this Policy shall have the following meanings.

Applicable Laws	means all applicable statutes, laws, ordinances, rules and regulations, including but not limited to the Listing Rules of the Colombo Stock Exchange and the Anti-Corruption Act No. 9 of 2023, in each case as in effect from time to time;
Board	means the Board of Directors of the Company;
Company	means Laugfs Gas PLC and Laugfs Power PLC;
Personnel	means all directors, consultants, management, officers and employees (including permanent, probation, temporary or contract staff) of the Company, and individuals (including trainees, seconded staff, casual workers, agency staff, interns);
Policy	means this Policy on Whistleblowing;
Third Parties	Includes, but is not limited to, customers, business partners, contractors, consultants, third party agents, third party introducers, and referrers, persons acting in a fiduciary capacity, suppliers and joint venture partners in any operations of the Company.

2. Introduction

The Board of Directors of the Company has adopted this Policy to encourage Personnel and Third Parties to report concerns regarding unethical, illegal, or unsafe practices within the organization. This policy aims to foster a transparent and accountable workplace culture where concerns can be addressed promptly and appropriately.

3. Scope

This Policy is applicable to the Company and its activities in all jurisdictions in which the Company operates. Accordingly, this Policy applies to:

- The Company and its business operations in all jurisdictions;
- Personnel; and
- Third Parties.

4. Related Policies

This Policy should be read in conjunction with the other policies, key documents and guidelines of the Company listed below.

- Policy on Anti-Bribery and Corruption;
- Policy on Internal Code of Business Conduct and Ethics;

5. Reporting Procedure

Personnel and Third Parties who become aware of potentially unethical, illegal, or unsafe behavior within the Company are encouraged to report their concerns promptly. Reports should be made in writing and sent to:

Mr Mayura Fernando on 0777881634 (email) at No 40/8P, Jasmine Park, Off Narahenpita Road, Nawala

Employees should seek guidance from their supervisors, the relevant departments or personnel, the Compliance Department, or the Legal Department if they suspect any conduct that could be fraudulent, corrupt, illegal, or in violation of policies and regulations

of the Company, or if there is any human rights violation, discrimination, harassment, or unethical behavior.

Because the Company takes reporting of misconduct, malpractice, and irregularities seriously and wishes to conduct warranted investigations into both prospective and actual infractions, it is preferable that these reports not be made anonymously. However, it is understood that for a variety of reasons, employees may be hesitant to report such infractions directly. In these circumstances, anonymous reports can be sent to the HR department of the Company.

6. Types of Concern

Examples of concerns that should be reported include but are not limited to:

- Financial misconduct (e.g., fraud, embezzlement).
- Violations of company policies or procedures.
- Discrimination or harassment.
- Environmental or safety concerns.
- Criminal activities.
- Any unethical behavior impacting the organization

The Policy is not intended to escalate any personal disagreements, call into question financial or business decisions made by the Company, or to revisit any staff problems that have already been addressed through the grievance procedure.

7. Confidentiality

All reports and investigations will be handled confidentially to the extent possible, consistent with the need to conduct a thorough investigation. Confidentiality will be maintained within legal and regulatory constraints and the principles of natural justice.

8. Non-Retaliation

The Company prohibits retaliation against any person who makes a good faith report under this Policy. Retaliation against whistleblowers is a serious violation and a breach of

Applicable Laws and will result in disciplinary action, up to and including termination of employment or contract.

9. Investigation

Reports will be promptly and thoroughly investigated by designated individuals or a committee appointed by the Company. Investigations will be fair, unbiased, and conducted with sensitivity to the confidentiality and rights of all parties involved. Where appropriate, corrective actions will be taken to address substantiated concerns.

10. False Reporting

If an employee or a Third Party makes a false report with malice, an ulterior motive, or for personal advantage, the Company maintains the right to take necessary action against such person to recover any loss or damage caused by the false report. In particular, the employee may face disciplinary action, including dismissal, as appropriate. Necessary legal action will be taken against other parties in relation to false reports.

11. Training and Communication

This Policy will be presented to all Personnel, and Third Parties at the start of business relationships and as needed subsequently. Personnel will receive training or other communication activities to raise awareness of bribery and corruption on a regular basis, depending on their function and risk exposure. Third-Party awareness and training programs will be implemented as needed.

12. Record Retention

To uphold transparency and accountability, all documentation related to this Policy will be maintained in accordance with relevant document retention procedures of the Company. These records, essential for compliance and oversight, must include records of complaints and investigations, details of training sessions for Personnel and Third Parties. Ensuring accessibility when needed, these records uphold standards of transparency and

accountability within the Company, facilitating effective governance and compliance with regulatory requirements.

13. Reviews

This Policy and related procedures will be reviewed at least annually, or more frequently if required, by the Compliance Department to:

- ensure they remain effective and relevant to the Company;
- ensure that they continue to comply with relevant laws, regulatory guidance and industry standards;
- ensure reports of breaches were appropriately recorded, investigated and responded to; and
- determine if any changes are required.

The results of this review will be presented to the Board.