



Policy on Whistleblowing



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ACME PRINTING & PACKAGING PLC
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ACME PRINTING & PACKGING PLC :

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1 Introduction

Whistleblowing is 'making a disclosure in the public interest' and occurs when a member of staff raises a concern about danger, impropriety or illegality that affects others, for example colleagues or members of the public.

All employees are encouraged to raise concerns about possible improprieties in matters of financial reporting and other malpractices in an appropriate way.

ACME Printing & Packaging PLC ("APPP") is committed to the high standards of openness, probity, and accountability. In line with that commitment APPP expects staff, and others that we deal with, who have serious concerns, to come forward and voice those concerns. All concerns will be dealt with on a confidential basis.

This Whistle-blowing Policy makes it clear that a member of staff can do so without fear of victimization, subsequent discrimination, or disadvantage. It is intended to encourage and enable staff to raise serious concerns within APPP rather than overlooking a problem or 'blowing the whistle' outside.

2 Scope

The policy applies to all APPP staff including Board Members and other Third-party agency workers, working for APPP.

3 Reporting a violation

APPP expects all employees to be responsible for compliance with the Policy, including the duty to seek guidance from the Responsible Officer whenever any aspect of the Policy is in doubt, and to report to the Responsible Officer any facts or circumstances that suggest a past or ongoing violation of this Policy by any officer, director, employee, consultant, agent, or other business partner acting on behalf of APPP.

This policy aims to,

- A. encourage staff to feel confident in raising serious concerns and to question and act upon concerns about practice.
- B. provide avenues for staff to raise those concerns and receive feedback on any action taken
- C. ensure that staff receive a response to their concerns and that they are aware of how to pursue them if they are not satisfied.
- D. reassure staff that they will be protected from possible reprisals or victimization if they have a reasonable belief that they have made any disclosure in good faith.

4 Grievance

There are existing procedures in place to enable employees to lodge a grievance relating to their own employment. The Whistle-blowing Policy is intended to cover major concerns that fall outside the scope of other procedures. These include

- A. conduct that is an offence or a breach of law
- B. disclosures related to miscarriages of justice
- C. health and safety risks, including risks to the public as well as to other staff
- D. damage to the environment;
- E. the unauthorized use of public funds;
- F. possible fraud and corruption
- G. sexual or physical abuse
- H. other unethical conduct, such as covering up wrongdoing

5 Report Mechanism

- A. Compliance with this Policy requires that employees on the side of caution discuss or report any actual or potential corruption red flags that may arise to the Responsible Officer without limitation.
- B. As a first step, the members of staff should normally raise concerns with their manager or their supervisor. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of malpractice. However, if for any reason they are reluctant to do so, the issue should be reported to the Human Resource Department (HRD).
- C. If staff members are uncomfortable reporting to the Responsible Officer and HRD they may instead report directly to the “Chief Executive Officer and/or Chair of the APPP’s Board of Directors.”
- D. Concerns may be raised orally or in writing. Staff who wish to make a written report should include: (a) the background and history of the concern (giving relevant dates); and (b) the reason why they are particularly concerned about the situation. The earlier a member of staff expresses the concern the easier it is to act.
- E. Staff may obtain advice/guidance on how to pursue matters of concern by contacting the Director of Operations or the HR Manager. Confidentiality will be maintained at all times. The name of the employee raising the concern will not be revealed without prior consent.
- F. APPP absolutely prohibits retaliation of any type or kind against any person who raises in good faith any questions or concerns, reports an actual or potential violation, or assists in an investigation under this Policy.

6 Penalties and Disciplinary Action

APPP will respond to concerns raised by a member of staff who must not forget that testing out concerns is not the same as either accepting or rejecting them. Where appropriate, the matters raised may.

- A. be investigated by management or through the disciplinary process.
- B. be referred to the police.

- C. be referred to the external auditor; and/or
- D. form the subject of an independent inquiry

7 Contact Information

Complaints should be raised either with the Department Line Manager or HR. Contact information should be disclosed

Designation	Name	Contact No.	Email
Responsible Officer/Ombudsman			
CEO			
HR Head			
All Department Heads			

8 Approval, Revision & Dissemination of the Policy

- A. The policy should be revised as deemed necessary, particularly in the event of changes in law and authoritative sources of best practice in corporate governance. However, it must be reviewed and revised at least every two years to ensure that it is updated to reflect developments in relation to the subject.
- B. The Nominations and Corporate Governance Committee is responsible for the initial review and recommendations to the Board and may obtain the services of the Company Secretary and Management in this regard.
- C. The policy shall be approved by the Board of Directors and signed by the Chairman.
- D. Upon revision of the policy, the Company Secretary will ensure that:
 - a) all directors are informed of the revisions
 - b) the policy is updated on the website of the Group/Company in accordance with CSE (Colombo Stock Exchange) Listing Rules

Approved at Board Meeting on xxxxxx

Chairman

Circulated to Directors on xxxx

Uploaded to website on xxx

Company Secretary