

	HELA APPAREL HOLDINGS PLC		
	POLICY ON ANTI-BRIBERY AND ANTI-CORRUPTION	Version No: 01	Issue Date December 30, 2024
Approved by Board of Directors on 18 th December 2024			

1. CORE VALUES & ZERO TOLERANCE FOR BRIBERY

1.1 Hela Apparel Holdings PLC including its subsidiaries in Sri Lanka (“Hela”) are committed to providing sustainable solutions for the apparel industry while upholding key values, such as quality, innovation, integrity, and transparency. It maintains a zero-tolerance stance on bribery and corruption, prohibiting any improper payments or unethical behavior.

2. SCOPE & APPLICABILITY

2.1 The policy applies to all stakeholders, personnel, and third parties. It ensures compliance with all anti-bribery laws and provides a confidential channel for reporting concerns.

3. RESPONSIBILITIES

3.1 The Board of Directors ensures ethical practices, while personnel must comply with the Anti-Bribery and Corruption (“ABAC”) policy, attend training, and report violations. Third parties are expected to follow Hela’s ethical standards.

4. NON-COMPLIANCE

4.1 Violations result in disciplinary action, including termination, and third-party relationships may be terminated. Retaliation against whistleblowers is strictly prohibited.

5. BRIBERY & CORRUPTION

5.1 Bribery, including gifts, hospitality, and facilitation payments, are forbidden. "Anything of value" includes cash, gifts, or services meant to secure an undue advantage.

6. GIFTS & HOSPITALITY

6.1 A "No Gift Policy" prohibits stakeholders from accepting gifts without proper approval. Gifts should not influence decision-making, and excessive exchanges are discouraged.

7. DONATIONS & SPONSORSHIPS

7.1 Donations and sponsorships must be transparent, legal, and aligned with Hela's core values, without securing improper business advantages.

8. CORPORATE SOCIAL RESPONSIBILITY (CSR)

8.1 CSR activities must be legitimate, with recipient organizations thoroughly vetted to avoid influencing business decisions.

9. FACILITATION PAYMENTS

9.1 Unofficial facilitation payments are prohibited. In life-threatening situations, they must be reported and documented.

10. CONFLICTS OF INTEREST

10.1 Stakeholders must avoid conflicts of interest, report any that arise, and third parties must disclose potential conflicts to ensure impartiality.

11. THIRD-PARTY DEALINGS:

11.1 Third parties are expected to adhere to Hela's ABAC policy and ethical standards, with proper due diligence and legal compliance.

12. PUBLIC OFFICIALS & POLITICALLY EXPOSED PERSONS (PEPS):

12.1 Ethical and transparent dealings are mandatory, with strict prohibitions on bribery or improper influence.

13. POLITICAL CONTRIBUTIONS:

13.1 Hela prohibits any use of company resources for political campaigns, parties, or candidates.

14. MERGERS & ACQUISITIONS:

14.1 Due diligence on bribery and corruption risks is mandatory in all mergers, acquisitions, and investments.

15. ANTI-MONEY LAUNDERING & COUNTER-TERRORISM FUNDING:

15.1 Hela strictly prohibits money laundering and terrorism funding activities, with personnel required to report any suspicious activities.

16. RECORD-KEEPING:

16.1 Hela commits to maintaining transparent, accurate records that reflect all transactions. Falsification of records is strictly prohibited.

17. WHISTLEBLOWING & SPEAK UP CHANNEL:

17.1 A confidential channel is available for stakeholders to report misconduct. Anonymity and protection against retaliation are ensured.

18. TRAINING:

18.1 Mandatory Anti-Bribery and Anti-Corruption training is required for all personnel, monitored by the Risk and Control Division.