

	<b>HELA APPAREL HOLDINGS PLC</b>		
	<b>POLICY ON WHISTLEBLOWING</b>	Version No: 01	Issue Date December 30, 2024
Approved by Board of Directors on 18 <sup>th</sup> December 2024			

## 1. INTRODUCTION

1.1 Uncompromised integrity is a critical corporate value and is embraced by Hela Apparel Holdings PLC and its subsidiaries (collectively referred to as “the Hela Group”). Covering Sri Lanka region. The Hela Group is committed to upholding the highest standards of lawful and ethical conduct, by demonstrating honesty, fairness, transparency and accountability in all our conduct and dealings. Hela subsidiaries in other regions will be consider case by case as per their laws.

1.2 The purpose of this Policy is to govern the speaking up/whistleblowing process, establish a clear mechanism and to encourage everyone who has a relationship with the Hela Group to voice and register their concerns, including any act or conduct that is in violation of the Group’s code of conduct, actual or suspected misconduct, illegal or unethical behavior, without fear of retaliation or unfair treatment.

## 2. SCOPE

2.1 This Policy applies to all wholly-owned Hela subsidiaries and to those joint ventures and other companies where Hela – directly or indirectly – has a controlling interest/majority stake.

2.2 Employees, suppliers, business partners, contractors, customers, associates and other stakeholders/counter parties shall voice their concerns (“Reporter”), so long as there is a reasonable belief or basis for the concern and the disclosure is made in good faith and not for personal gain or motivated by ill or malicious intention.

2.3 Reporter shall ensure that mere rumor information is not the basis for speaking up or to whistle blow.

2.4 The official Speak Up channel can be used to report any concerns related to Hela Group business practices and non-compliances relating to, but not limited to, the areas mentioned below. This channel is not meant for anyone to report customer/ buyer complaints or to make enquiries about any of the services that the Hela Group provides to its customers.

- (a) Abuse of power/authority
- (b) Accounting, internal controls or IT
- (c) Anti-competition
- (d) Breach of company policy

- (e) Bribery & corruption
- (f) Data confidentiality or privacy
- (g) Conflict of interest
- (h) Fraud & breach of trust
- (i) Gifts, sponsorships, donations, entertainment & hospitality
- (j) Harassment, bullying & sexual misconduct
- (k) Health, safety, security & environment
- (l) Insider trading
- (m) Malpractices
- (n) Misappropriation of company assets
- (o) Misuse of social media or business communications
- (p) Money laundering
- (q) Retaliation from speaking up
- (r) Substance abuse or drugs
- (s) Theft or misuse of resources
- (t) Violation of any law and regulation
- (u) Workplace & people

### **3. WHAT TO INCLUDE WHEN REPORTING A CONCERN**

3.1 Concerns should be raised via the official Speak Up channel by email to [latiffm@helaclotthing.com](mailto:latiffm@helaclotthing.com). To raise a concern. The email option is available 24 hours a day, 7 days a week, and can be used by employees, suppliers, business partners, contractors, customers, associates and other stakeholders/counter parties.

3.2 When using the official Speak Up channel, the Reporter is required to include as much factual details as possible, such as the background or nature of the concern, when and where it happened, any other supporting evidence (if available) and persons involved including witnesses. In addition, the Reporter is strongly encouraged to disclose his/her name and contact information. Despite this, the Reporter can opt to remain anonymous if he/she wishes. During the investigation, reporters' details will be kept confidential & anonymous.

3.3 The Hela Group shall protect the confidentiality of the Reporter and the information disclosed very seriously. If the person chooses to disclose his/her identity, the only people who will know his/her details are the Administrators of the Speak Up channel, the Investigator and/or the Investigation Team, and the relevant authorized personnel who have access to information recorded under this Policy. The Hela Group will not disclose the Reporter's identity to anyone else unless:

- (a) the Hela Group is legally obliged to disclose the Reporter's identity; or
- (b) the disclosure is required when the Hela Group decides to report to the police, relevant regulatory bodies/ authorities or the courts; or
- (c) disclosure is necessary to prevent or lessen a threat to the Reporter's health, safety or welfare; or
- (d) the Reporter gave his/ her consent to the disclosure.

#### **4. PROTECTION FROM RETALIATION**

4.1 The Hela Group is committed to protect, within reason and means, anyone who reports or raises a concern in good faith, and those who participate in or investigate, from retaliation. Investigators will advise all parties who are involved in the process of this commitment, and report any perceived retaliation based on participation in an investigation.

4.2 No party should retaliate against the persons who reported the concerns as well as those who assisted in the investigations. Any person subjected to retaliation must file a new report using the same Speak Up channel by substantiating the retaliation claim with information or documentation. Any party regardless of designation, if proven guilty of retaliation against these persons, shall be subjected to disciplinary action.

4.3 If the person who reported the concern implicates his/her own conduct in the report, he/she will not be given immunity from investigation, disciplinary action, criminal prosecution and/or civil liability. The same applies to anyone assisting in an investigation. However, the Hela Group will take the disclosure and cooperation with the investigation into consideration when determining disciplinary or other actions.

#### **5. PROCESSING OF CONCERNS RAISED**

5.1 Concerns reported via the official Speak Up channel will be received by the Administrators of the Speak Up channel (comprised of Hela Head of Risk & Control (HRC), Group Chief Executive Officer (GCEO), Group Chief Financial Officer (GCFO), Group Chief Peoples Officer (GCPO), Chief Executive Officer Private Label Division (CEO PLD).

5.2 The Administrators of the Speak Up channel shall assess the concern based on the information provided by the Reporter such as nature of the concern, when and where the alleged misconduct happened, details of the person(s) involved, witnesses, supporting evidence and other relevant information provided.

5.3 All reported concerns on employment-related complaints or grievances shall be referred to the Hela Apparel Holdings PLC Defalcation Committee (DC) via the Hela Group Human Resource (GHR) department. Based on the decision endorsed by the Defalcation Committee, the GHR department shall address the concern in accordance with their policies and procedures.

5.4 If the reported concern warrants an investigation, the Administrators of the Speak Up channel assign the reported concern to an Investigator to conduct the investigation in a fair, objective and confidential manner, within a reasonable period depending on the nature of the concern.

5.5 On completion of the investigation, a report shall be prepared and submitted to:

- (a) the relevant stakeholders at the applicable Hela Group/subsidiary, Senior management & Board Audit Committee members by the Internal Audit Investigation Team.

5.6 Consequence management, including disciplinary actions, shall be meted out according to the applicable Hela Group policy or Code of Conduct; documented and monitored. Where the findings of a case disclose a possible criminal offence, the case shall be escalated to the applicable Hela Group/subsidiary Board Audit & Risk Committee (“BARC”) and Board of Directors for deliberation. The applicable Hela Group/subsidiary will report criminal matters to the police or relevant regulatory bodies/authorities if such reporting is required by the applicable law based on the results of the investigation.

5.7 The person who reported the concern will be updated on the status and/or progress of the investigation subject to Hela Group policies and procedures.

5.8 Details of all the concerns raised (investigated or not) shall be maintained. Respective status, reports, supporting documents, evidence, and monitoring of corrective action shall be retained and securely filed by the Administrators of the Speak Up channel, for a minimum period of retention according to the respective law at countries which Hela Group operates.

5.9 Any leakages or exposure of the investigation results will be treated as major misconduct and be subject to disciplinary action, as stipulated in the applicable Hela Group’s HR policies.

## **6. OVERSIGHT AND OWNERSHIP OF POLICY**

6.1 The Hela Group’s BARC has overall responsibility for this Policy and oversees the implementation of this Policy. Hela HIA has the day-to-day responsibilities of administering and implementing this Policy directly reporting to the BARC. The use and effectiveness of this Policy shall be regularly monitored and reviewed by the HIA.

6.2 The owner of this Policy is Hela HIA who shall be responsible for incorporating any amendments and updates after obtaining the approval of the BARC for all amendments and updates and distributing the same to the relevant parties.

## **7. WHISTLEBLOWING PROCESS FLOW**

*Please refer to the diagram on the subsequent page.*

