



HABIB BANK
හබිබ් බැංකුව
ஹபீப் வங்கி

MEMO

To: Sujeenie Gunasekera, Country Manager, HBL Sri Lanka.

From: Hasitha Ganegama, Regional Head of Compliance – Sri Lanka & Maldives

Date: 09th January 2025

Subject: Adoption of Global Whistleblowing Policy and Program (Version 3.0)

The global whistle blowing policy and program outlines the framework for enabling employees and other stakeholders to report unethical or unlawful activities, malpractices, or violations of regulations in a safe, confidential, and retaliation free manner. This policy aims to uphold transparency, accountability and ethical conduct across the organization.

International locations are required to create addendums only in situations where the global policy conflicts with statutory or regulatory framework of the host country, or when local regulatory requirements are not fully addressed in the global policy. If no such conflicts or gaps exist, the global policy applies “as is “. We confirm that there are no conflicts or discrepancies between the global whistleblowing policy and program with the local regulatory requirements of Sri Lanka. Hence the global whistleblowing policy and program, approved by the board on October 2024 is being adopted by HBL Sri Lanka on an “as is “basis.

This memo is raised to seek approval from the local management for the adoption of the global whistleblowing policy and programme. The policy will be reviewed triennial or earlier if required.

Recommended by,

Shashikala Kandage,
Manager Compliance.

Concurred by,

Hasitha Ganegama,
Regional Head of Compliance, Sri Lanka and Maldives.

Approved by,

Sujeenie Gunasekara,
Country Manager.