

Anti-Bribery and Corruption Policy

1. Introduction

At Cannel Private Limited ("the Company"), we are committed to conducting our business with the highest standards of integrity and ethics. We recognize the damaging impact that bribery and corruption can have on society, the economy, and our reputation. This Anti-Bribery and Corruption Policy outlines our zero-tolerance approach towards bribery and corruption and provides guidelines for all employees, contractors, agents, and business partners to follow.

2. Scope

This policy applies to all individuals and entities associated with the Company, including but not limited to employees, directors, officers, contractors, consultants, agents, suppliers, distributors, representatives, and joint venture partners. It covers all activities undertaken by the Company globally.

3. Compliance with Laws and Regulations

The Company is committed to complying with all applicable anti-bribery and corruption laws and regulations in every jurisdiction where we operate. This policy is in line with the requirements of the bribery laws of Sri Lanka, the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act, and other relevant legislation.

4. Prohibited Conduct

4.1 Bribery

Bribery, in any form, is strictly prohibited. This includes offering, promising, giving, receiving, or soliciting bribes, whether in cash or any other form of inducement, with the intent to influence business decisions or gain an unfair advantage.

4.2 Facilitation Payments

Facilitation payments, also known as "grease payments," are small payments made to expedite routine government actions. Such payments are strictly prohibited by the Company, as they are considered to be bribes and are illegal under many anti-bribery laws.

4.3 Kickbacks and Improper Payments

Kickbacks, secret commissions, or any other improper payments made to or from employees, agents, or business partners are strictly prohibited. All financial transactions must be accurately and transparently recorded in our books and records.

4.4 Political Contributions

Political contributions or donations must comply with all applicable laws and regulations and be made transparently. We prohibit using company funds or resources for illegal or improper political purposes.

5. Gifts, Hospitality, and Entertainment

Gifts, hospitality, and entertainment may be offered or received in the course of business, provided they are reasonable, proportionate, and consistent with local customs and regulations. However, they must not be offered or accepted with the intention of improperly influencing business decisions or gaining an unfair advantage.

6. Due Diligence

Before entering into business relationships with third parties, such as suppliers, distributors, agents, or business partners, we conduct due diligence to assess their integrity, reputation, and compliance with anti-bribery laws. This helps to ensure that we engage in business with trustworthy and ethical partners.

7. Reporting and Whistleblowing

The Company encourages all employees and stakeholders to report any suspected or actual breaches of this policy promptly. We maintain a confidential reporting mechanism, such as a whistleblower hotline or an ethics helpline, to enable individuals to report concerns without fear of retaliation.

8. Consequences of Non-Compliance

Any violation of this policy may result in disciplinary action, up to and including termination of employment or business relationship. Violations of anti-bribery and corruption laws may also lead to criminal prosecution, substantial fines, and damage to our reputation.

9. Training and Communication

The provides regular training to all employees, contractors, and agents on this policy and their obligations under anti-bribery and corruption laws. We communicate this policy to all stakeholders and ensure its availability and accessibility through our internal communication channels.

10. Compliance Monitoring and Review

We regularly review and update this policy to ensure its effectiveness and alignment with evolving legal and regulatory requirements. Compliance with this policy is subject to periodic