



POLICY ON WHISTLE BLOWING

WindForce PLC

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Policy on Whistleblowing

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1. Definitions and Abbreviations

Unless otherwise defined or the context otherwise requires, all capitalized terms used in this Policy shall have the following meanings.

Applicable Laws	means all applicable statutes, laws, ordinances, rules and regulations, including but not limited to the Listing Rules of the Colombo Stock Exchange and the Anti-Corruption Act No. 9 of 2023, in each case as in effect from time to time;
Company	means WindForce PLC;
Personnel	means all directors, consultants, management, officers and employees (including permanent, probation, temporary or contract staff) of the Company, and individuals (including trainees, seconded staff, casual workers, agency staff, interns);
Policy	means this Policy on Whistleblowing;
Third Parties	includes, but is not limited to, customers, business partners, contractors, consultants, third party agents, third party introducers, referrers, persons acting in a fiduciary capacity, suppliers and joint venture partners in any operations of the Company.

2. Policy Statement

The Board of Directors of the Company has established this Policy to encourage Personnel and Third Parties to report any concerns about unethical, illegal, or unsafe practices within and relating to the Company including non-compliance with Company's other codes, ethics, policies, key documents and guidelines. The aim of this Policy is to create a transparent and accountable workplace culture that ensures concerns are addressed promptly and appropriately. This Policy should be read in conjunction with the other codes, ethics, policies, key documents and guidelines of the Company.

3. Scope

This Policy applies to the Company and all Personnel and Third Parties, and aims to:

- (a) encourage staff to feel confident in raising serious concerns and to question and act upon concerns about unethical, illegal, or unsafe practices.
- (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.

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 but are not limited to:

- (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.

together referred to as “Unsound Practices” herein.

4. Reporting Mechanism

Personnel and Third Parties who become aware of potent Unsound Practices within the Company are encouraged to report their concerns promptly.

Reports may be raised in writing via the dedicated whistleblower email address whistleblowerWF@corporateadvisory.lk.

Reports should where possible, include:

- (a) the background and history of the concern/ Unsound Practice (giving relevant dates); and
- (b) the reason why they are particularly concerned about the situation.

All emails received will be recorded, logged and automatically forwarded to the designated members of the Audit Committee of the Company for review and appropriate action.

Anonymous reports will be accepted; however, whistleblowers are encouraged to provide sufficient detail to enable effective review and follow up.

The Company takes all reports of Unsound Practices seriously and will ensure that each report is reviewed and addressed in accordance with this policy.

5. Evaluation of Reports

Reports will be evaluated based on the quality and credibility of the information provided. The recipients of the reports and the Company will ensure that the identity of the whistleblower remains confidential at all times, including during investigations, unless disclosure is required by Applicable Laws or subject to prior written consent of the whistleblower.

All reports will be acknowledged by the recipient/ Company within 5 working days of receipt. Investigations will be completed within 30 working days, or an extended period if complexity of the Unsound Practice so requires. The whistleblower will be informed of the outcome, where appropriate.

Investigations will be conducted confidentially by the compliance officer or an independent panel, ensuring no conflict of interest. Findings will be reports to the Board or a sub-committee, and necessary action will be taken promptly.

6. Penalties and Disciplinary Action

The Company will respond to concerns raised by Personnel and Third Parties, 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.

This Policy is not intended to escalate personal disagreements, challenge financial or business decisions made by the Company.

7. Non-Retaliation

The Company prohibits retaliation against any person who makes a good faith report under this Policy or assists in investigations. Retaliation against whistleblowers is a serious violation and a

breach of Applicable Laws and will result in disciplinary action, up to and including termination of employment or contract.

8. False Reporting

If Personnel or a Third Party submits a false report with malice, ulterior motives, or for personal gain, the Company reserves the right to take appropriate action against that individual to recover any losses or damages resulting from the false report. Specifically, employees may face disciplinary measures as deemed appropriate.

9. Training and Communication

This Policy will be shared with all Personnel and Third Parties at the beginning of business relationships and as required thereafter. Personnel will undergo training or other communication initiatives to regularly raise awareness of bribery and corruption, tailored to their specific roles and risk exposure. Training and awareness programs for Third Parties will be implemented as necessary.

This Policy will be hosted on the corporate website of the Company on www.windforce.lk

10. Record Retention

To promote transparency and accountability, all documentation associated with this Policy will be kept in line with the Company's relevant document retention procedures. These records, which are crucial for compliance and oversight, must encompass records of complaints and investigations, as well as details of training sessions for Personnel and Third Parties. By ensuring these records are accessible when needed, we maintain high standards of transparency and accountability within the Company, supporting effective governance and compliance with regulatory requirements.

11. Compliance and Enforcement

The Board shall regularly monitor compliance with this Policy. Non-compliance with this Policy may result in disciplinary action or other appropriate measures in accordance with Company policies and Applicable Laws.

Any waivers from compliance with this Policy or exemptions granted by the Company will be fully disclosed in the annual report.

12. Effective Date and Amendments

This Policy will be effective from 01st Oct 2024 and will be reviewed at least bi-annually or more frequently (if required) to ensure effectiveness, compliance with industry standards and Applicable Laws.