



DIALOG FINANCE PLC

POLICY ON WHISTLEBLOWING

Control of the Document

Document Type	Approved By	Document Owner	Security Classification
Policy On Whistleblowing	Board Audit Committee (BAC) – Dialog Finance PLC (DFP)	Lead Operations Auditor	Company Use Only

Revision History

Revision No.	Nature of Change/ Description of Change	Approved Date	Approved by
1 st	Initial Issue	20.06.2025	BAC
2 nd	Data Privacy and Cross-Border Transfers section as per PDPA Act	21.11.2025	BAC

Table of Contents

1.	Introduction	4
2.	Scope.....	4
3.	What To Include When Reporting a Concern.....	6
4.	Protection From Retaliation	7
5.	Processing Of Concerns Received	8
6.	Data Privacy and Cross-Border Transfers	10
7.	Oversight And Ownership of Policy	11
8.	Review	11

1. Introduction

Uncompromising Integrity is one of the core values embraced by Dialog Finance PLC. DFP 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.

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

2. Scope

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.

The reporter shall ensure that mere rumor or hearsay information is not the basis for speaking up or whistling blow.

The official Speak Up channel is <https://axiatagroup.integrityline.com>. It can be used to report any concerns related to the Company’s business practices and non-compliances relating to, but not limited to, the areas mentioned below. This channel is not meant by anyone to report customer complaints or to make inquiries about any of the services that the Company provides to its customers.

- (a) Abuse of Power/Authority
- (b) Accounting, internal controls, auditing 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 Insider trading
- (l) Malpractices
- (m) Misappropriation of company assets
- (n) Misuse of social media or business communications
- (o) Money Laundering
- (p) Retaliation from Speaking Up
- (q) Substance abuse or drugs
- (r) Theft or misuse of resources
- (s) Violation of any law and regulation
- (t) Workplace & people

3. What To Include When Reporting a Concern

- 3.1** Concerns should be raised via the official Speak Up channel, which 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 many 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. Notwithstanding this, the Reporter can opt to remain anonymous if he/she so wishes.
- 3.3** DFP 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. DFP will not disclose the Reporter's identity to anyone else unless:
- (a) DFP is legally obliged to disclose the Reporter's identity; or
 - (b) The disclosure is required if and when the DFP decides to report to the police, relevant regulatory bodies/authorities 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** DFP is committed to protect, within reason and means, anyone who reports or raises a concern in good faith, and those who participate in or conduct an investigation, 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 people 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 factual information or documentation. Any party regardless of designation, if proven guilty of retaliation against these people, shall be subjected to disciplinary action.
- 4.3** If the person who reported the concern implicates his/her 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 Company will take the disclosure and cooperation with the investigation into consideration when determining disciplinary or other actions.

5. Processing Of Concerns Received

- 5.1** Concerns reported through the official Speak Up channel are initially received by the designated Administrators, including the Group Chief Internal Auditor (GCIA). Upon receipt, the IA via the GCIA escalates the matter to the Defalcation Committee for further investigation. This committee is comprised of the Chief Executive Officer (CEO), Head of Risk and Compliance, Head of Human Resources (HR), and the Internal Auditor. The committee is responsible for conducting a thorough and impartial investigation into the reported concerns, ensuring appropriate action is taken in line with organizational policies and governance standards.
- 5.2** The Administrators of the Speak Up channel shall assess the concern based on the information provided by the Reporter such as the 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** Employment-related complaints or grievances shall be referred to in the applicable Human Resources Department to be addressed 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 the relevant stakeholders; and to the Board Audit Committee (BAC) by the IA representing the Defalcation Committee.
- 5.6** Consequence management, including disciplinary actions, shall be met according to the applicable DFP Code of Conduct; documented and monitored. Where the findings of a case disclose a possible criminal offense, the case shall be escalated to the applicable Law Enforcement Board of Audit Committee (“BAC”) and the Board of Directors of the Company for deliberation. The Company 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 the Company’s 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 of the country.
- 5.9** Any leakages or exposure from the investigation results will be treated as major misconduct and subject to disciplinary action.

6. Data Privacy and Cross-Border Transfers

Dialog Finance PLC (DFP) is committed to protecting the personal data of all individuals who report concerns through the official Speak Up channel. In line with the Personal Data Protection Act, No. 9 of 2022 (PDPA), the following provisions apply:

6.1 Cross-Border Data Transfer

The Speak Up platform is hosted by Axiata Group and located in the European Union (EU). As such, any personal data submitted through this channel may be transferred and stored outside Sri Lanka.

6.2 Legal Basis and Safeguards

DFP ensures that such cross-border transfers are conducted in compliance with PDPA requirements. Appropriate safeguards are in place, including:

- Standard Contractual Clauses (SCCs) approved under applicable data protection laws.
- Binding corporate rules and agreements between DFP and Axiata Group.
- Measures to ensure confidentiality, integrity, and availability of personal data.

6.3 Data Subject Rights

Individuals submitting concerns have the following rights under PDPA:

- Right to access their personal data.
- Right to request correction or deletion of inaccurate data.
- Right to object to processing under certain conditions.
- Right to lodge complaints with the Data Protection Authority of Sri Lanka.

6.4 Transparency and Consent

By using the Speak Up channel, individuals acknowledge that their personal data may be transferred to and processed in the EU. DFP will not disclose personal data to third parties unless required by law, authorized by the individual, or necessary to protect the individual's vital interests.

7. Oversight And Ownership of Policy

The Company's BAC has overall responsibility for this Policy and oversees the implementation of this Policy. DFP's assigned Lead Operation Auditor has the day-to-day responsibilities of administering and implementing this Policy directly reporting to the BAC. The use and effectiveness of this Policy should be regularly monitored and reviewed by the Lead Operations Auditor.

8. Review

The owner of this Policy is DFP's Lead Operations Auditor who shall be responsible for incorporating any amendments and updates after obtaining the approval of the BAC for all amendments and updates and distributing the same to the relevant parties.

=====**The End**=====

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Annexure

