

Policy on Whistleblowing for Ceylon Hospitals PLC

PURPOSE

Whistleblowing provides a safe and confidential mechanism for Stakeholders to raise concerns about any aspect of the operations of Ceylon Hospitals PLC, patient care, safety, ethical practices without any fear or retaliation.

The policy aims to encourage open communication to foster an environment where staff can openly speak about their concerns, the Company gives assurance to the whistle blower's confidentiality and trust to be maintained, unless the disclosure is required by law.

This policy will provide the channel that concerns can be raised via direct supervisors, the Human Resources Department, or to the allocated third party. This policy will also indicate the party and process followed to investigate the matter and any corrective action to be taken and feedback to be given to the whistle blower where appropriate.

The policy also extends the support to the Whistle blower with counselling services where required. This policy is committed towards maintaining the highest standards of integrity and accountability. Stakeholders are encouraged to report any concerns they may have with regard to any malpractice or wrongdoing.

DEFINITIONS

- **Whistleblowing:** The act of reporting the malpractice, wrongdoing, or safety issues within Ceylon Hospitals PLC. This includes unsafe patient care, unethical behavior or non-compliance to Ceylon Hospitals PLC's policies and procedures.
- **Whistle blower:** Any party related to Ceylon Hospitals PLC who raises a concern about any aspect of the operations in good faith.
- **Malpractice:** Improper, illegal, or negligent activity or treatment, especially by healthcare professionals.
- **Prescribed person:** An individual/external body that the whistleblower can report their concerns/misconduct.

SCOPE

Inclusions:

All employees, Locum, Trainees, Suppliers or other Third Parties, Patients or any volunteers. Misconduct/Malpractice may include in the areas of Patient Safety, Financial, Breach of Patient Confidentiality, Discrimination or Harassment, Fraud, Theft or Environmental Hazards.

Exclusions:

All mala-fide statements/complaints that does not carry any evidence or facts.

RESPONSIBILITY

The prescribed person: The person who receives the whistle blower to send the content to the authorised person. To ensure confidentiality and compliance to the said policy independently the Company has allocated a Third Party to independently receive all Whistle blowers.

Board Audit Committee (BAC) and Board Human Resource Committee (BHRC): Head of Internal Audit, & Compliance, Head of Human Resources to report to the BAC or BHRC on findings to obtain any corrective action to be taken with regard to same.

HR and Internal Audit Department: To conduct an independent inquiry with regards to the reported matter.

Senior Management: To oversee the overall implementation of the whistleblowing policy.

Board of Directors: To comply with the policy when the whistleblower is a member of the Senior Management or EXCO.

POLICY

1. **Encouraging to report:** Ceylon Hospitals PLC encourages to report any concerns regarding any unethical, illegal, or unsafe practices that amount to financial or non-financial impact. Reporting may also be anonymous. However, Ceylon Hospitals PLC encourages disclosure of the author to the complaint/statement as it will be beneficial even at the time of giving feedback regarding same.
2. **Protection from Retaliation:** Those who report matters in good faith will be protected from retaliation, harassment, or any adverse consequences towards one's employment. Any sort of established retaliation against the whistleblower will be subject to strict disciplinary action to be taken against the individual(s).
3. **Confidentiality:** All statements and complaints will be treated confidentially, consistent with the need to investigate. The identity of the whistleblower will be kept confidential unless the individual agrees otherwise, or disclosure is required by law.
4. **Reporting mechanism:** Statements and complaints can be reported via multiple mechanisms which includes incidental reporting through intranet and contact provided in the website.
5. **Investigation:** Based on the content of the reported matter the prescribed person will direct the matter to HR or Internal Audit Department through the BAC or BHRC for further investigation. A matter regarding misconduct related to a financial loss amounting to more than internally approved threshold will be directed to the Head of Internal Audit & Compliance for further investigation through BAC. If the concerned matter is related to a grievance, harassment, or any other HR related matter the content will be directed to Head of Human Resources through the BHRC to carry out further investigation. In the event the whistleblower is a member of the EXCO or Senior Management the content to the statement will be directed to the Board of Directors.
6. **Outcome and follow up:** The outcome of the investigation will be communicated to the Board and necessary actions will be taken.
7. **Training and Awareness:** Regular Training sessions will be conducted to ensure that all employees are aware of the whistleblowing policy and procedures.

POLICY IMPLEMENTATION

Communication and Awareness: Ensure that the policy is distributed across all Stakeholders via e mail, Intranet and copies to be displayed in common places. Conducting regular Awareness programs on the importance of the policy, including at the Induction program.

Reporting mechanisms: via Hotline, email, face to face or letter in writing. Anonymous is accommodated based on the fear of retaliation towards the whistleblower. A third party allocated to receive all whistleblowers known as "prescribed person" to follow the said guideline.

Investigation Process: prompt action to be taken by acknowledging receipt of the content to the whistleblower within 24 hours of receiving same. Thereafter investigation to commence by the respective Department Head complying to the above, maintaining thorough documentation on all reports and investigations.

Protection and Support:

- **Non retaliation:** Ceylon Hospitals PLC gives assurance that the rights of the Whistleblower will be always protected. The whistleblower possesses the right to report any matters that may amount to retaliation.
- **Confidentiality:** Ensure the confidentiality and trust of the Whistleblower will not be broken unless disclosure is required by law or with consent of the whistleblower is produced at the time of the investigation.
- **Support services:** The Company provides support services such as counselling where it is established that the whistleblower has been caused anxiety because of reporting.
- **Monitoring and Review:** Regular audits on the process implemented to be conducted and identify areas of improvement. Implement a feedback mechanism to gather inputs from Stakeholders to look at further improvement. The said policy is to be reviewed annually.

Leadership Commitment:

- **Top-Down support:** Ensure the Hospital's leadership team publicly supports the Whistleblowing Policy and demonstrates a commitment to ethical practices.
- **Role modelling:** Encourage Leaders to model ethical behavior and create an environment where employees feel safe and supported.