


| PACKWELL LANKA (PVT) LIMITED | | | |
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| ANTI-BRIBERY AND CORRUPTION POLICY STATEMENT | | | |

Packwell is committed to applying the highest standards of ethical conduct and integrity in its business activities. Every employee and individual acting on Packwells' behalf is responsible for conducting company business honestly and professionally.

Packwell consider that bribery and corruption has a detrimental impact on business by undermining good governance and distorting free markets.

Packwell benefits from carrying out business in a transparent and ethical way and by helping to ensure that there is honest, open and fair competition in our sectors. Where there is a level playing field.

Packwell do not tolerate any form of bribery by, or of, its employees or any persons or companies acting for it or on its behalf. The Board and senior management are committed to implementing and enforcing effective systems to prevent, monitor and eliminate bribery.

Packwell has issued an Anti-Bribery Policy. The Anti-Bribery policy applies to all employees and they are required to familiarise themselves and comply with the policy.


A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company (whether directly or indirectly) to induce or influence that individual or company to perform public or corporate functions or duties improperly.

A breach of Packwell Anti-Bribery policy by an employee will be treated as grounds for disciplinary action, which may result in a finding of gross misconduct and immediate dismissal.

Packwell will not conduct business with service providers, agents or representatives that do not support Packwell anti-bribery objectives.

The success of Packwell anti-bribery measures depends on everyone playing their part in helping to detect and eradicate bribery. Therefore, all employees and others acting for, or on behalf of, Packwell are encouraged to report any suspicious activity to the Company HR Manger.

September 2015

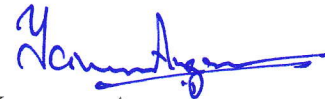
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ANTI-BRIBERY POLICY

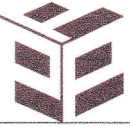
At Packwell, we are committed to doing the right thing, the right way. Our Code of Ethics and Behaviours outlines the standards and behaviours that Packwell upholds as a company, to ensure that the highest standards of honesty and integrity are maintained. This is more important than ever because of the strict new rules brought in by the new Bribery Act.

We operate a zero tolerance approach to the making or receiving of bribes or corrupt payments, in any form. This type of conduct is absolutely prohibited, whether committed by employees or anyone else acting on the Company's behalf.

This policy sets out what is and is not acceptable in general terms, but if you are in any doubt as to whether any conduct could amount to bribery, the matter should be referred to the Company Human resources manager, who is the Chief Compliance Officer for this policy. It is essential that you read and comply with this policy.




Yamunu Angamma
Managing Director

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1. ABOUT THIS POLICY

This policy sets out what we must all do to help prevent bribery in all its forms. A bribe may include any payment, benefit or gift offered or given with the purpose of influencing a decision or outcome. The bribe may not always be of a large value. It could be a lunch or an invitation to a sporting event.

Packwell is fully committed to complying with its obligations under applicable legislation, ensuring that no bribes or corrupt payments are made, offered, sought or obtained by anyone acting on its behalf, to anyone.

If you are ever in doubt about a situation with which you are presented, always seek advice. You should contact the company Human resources manager on 0112 635382 Ext. # 230 or e-mail: gihan@packwell.lk in the first instance.

2. WHO MUST COMPLY?

The Packwell Lanka (Pvt) Limited Anti-Bribery policy is mandatory for all Packwell employees, agents, intermediaries, consultants, distributors, sub-contractors, suppliers and Joint Venture partners working on the Company's behalf anywhere in the world ("Business Partners").

It is important that you take the time to read and comply with this Policy. The prevention, detection and reporting of any bribery in any form is the responsibility of all employees across the Packwell Lanka and all individuals and entities over which Packwell has control. Appropriate confidential channels for employees and Business Partners are in place to report any suspicion of bribery, these are described later in this Policy. Any failure to comply with this Policy will be treated seriously and may result in disciplinary action.

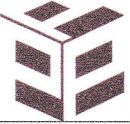
3. HOW DO YOU COMPLY?

You must read and abide by the terms of this Policy. You may also be required to provide written confirmation that you will comply with this policy.

4. WHAT HAPPENS IF YOU DON'T COMPLY?

For Employees:

Any act of bribery, in whatever form is unacceptable. We will consider taking disciplinary action against anyone who fails to comply with the anti-bribery policy up to and including dismissal.

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5. WHAT YOU CANNOT DO

Prohibited Conduct

The following conduct is absolutely prohibited under this Policy:

- Making unofficial payments to officials in order to obtain any permission or permit;
- Appointing any third party or supplier to act on behalf of Packwell who you know or have good reason to believe to have engaged in any corrupt or unlawful conduct including any offences under the Act;
- Paying any third party for the purposes of being a 'fixer' to open doors.

Facilitation Payments

Facilitation payments ('facilitating', 'speed', 'back-hander' or 'grease' payments) are any payments, usually small cash payments made to low-level officials, as a bribe to secure or expedite the performance of a routine or necessary action or level of service.

Packwell employees or Business Partners must never offer, pay, solicit or accept bribes in any form, including facilitation payments.


Exception: The only exception to paying a facilitation payment is where your life is in danger. If a facilitation payment is made in such circumstances, it must be reported as soon as practicable or possible to the Company Human resources Manager, in order that it can be recorded.

Packwell employees and Business Partners should report, via the Employee Assistance Programme employee helpline any instance where a facilitation payment is alleged to have been paid on the Company's behalf.

6. CHECKING OUT SUPPLIERS AND PARTNERS: DUE DILIGENCE

Where there is a Significant Bribery Risk all Business units must consult the Company Secretary in relation to appropriate anti-bribery compliance measures before:

- Appointing a new supplier;
- Entering into a partnership;
- Appointing an agent to work on the Company's behalf; or
- Entering into a new contract/or amending the terms of an existing contract

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A Significant Bribery Risk

1. The services being provided involve work being undertaken, directly or indirectly on our behalf, in any High Risk Jurisdiction;
2. The services involve goods passing through borders between High Risk Jurisdictions;
3. The services involve business partners paying fees, taxes or payments on behalf of Packwell in relation to the import or export of goods;
4. The services involves business partners obtaining official permits, permissions or agreement from public officials or agencies; or
5. There are any particular reasons to suspect that the risk of corruption or bribery is higher than normal.

7. GIFTS, HOSPITALITY AND ENTERTAINMENT

All Packwell employees are expected to conduct themselves with integrity, impartiality and honesty at all times. Accordingly, **all employees are required to follow these rules on Gifts, Hospitality and Entertainment.**

You must maintain a high standard of professionalism and not open yourself up to suspicion of dishonesty or put yourself in a position of conflict between your work and your private interests. Gifts and entertainment given and received as a reward, inducement or encouragement for preferential treatment or inappropriate or dishonest conduct are strictly prohibited. In particular, no gifts, hospitality or entertainment may be given or accepted during a tender process or during contractual negotiations if there is any realistic risk that such gifts or entertainment could influence the outcome of such processes or negotiations.


It is important that all Packwell employees' actions are able to withstand scrutiny, and not cause any embarrassment to the Company, yourself or any third party, including contractors or suppliers.

Hospitality/Entertainment

Packwell employees may occasionally receive invitations from suppliers or others to corporate hospitality or entertainment events.

Hospitality or entertainment may only be accepted if:-

- Employees or personnel from the supplier are in attendance;
- The supplier does not pay any accommodation or (more than trivial) travel expenses for Packwell employees;

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- The entertainment and/or acceptance of it could not be interpreted as a reward, inducement or encouragement for a favour or preferential treatment; and
- It is not unduly lavish or extravagant.

8. POLITICAL AND CHARITABLE CONTRIBUTIONS

Packwell does not make contributions or donations to political organisations or independent candidates, nor does it incur any political expenditure.

We respect the right of individual employees to make personal contributions, provided they are not made in any way to obtain advantage in a business transaction.

Packwell communicates views to government and others, on matters which affect its business interests or those of its shareholders and employees, as a way of assisting in the development of regulation and legislation affecting the business.