

Mobitel Code of Business Practice for Business Partners

Introduction

The Mobitel Code of Business Practice (herein “the Code”) serves as a code of Mobitel and Vendors commitment to Mobitel (Private) Limited hereinafter referred to as the “Company” to do business in a manner that is efficient, effective and fair. It also serves to assist Vendors to live up to the Company’s high ethical business standards, to provide guidance on the way that Vendors should conduct themselves when dealing with parties doing business with the Company and the manner in which all Vendors should conduct themselves in relation to business activities with the company.

The code applies to:

- a) All Vendors of Mobitel (Pvt) Ltd
- b) All parties or entities doing businesses with the Company

Responsibility and Accountability

Vendors and Suppliers/Contractors, Subcontractors

The Company expects all its suppliers, vendors, contractors and their respective subcontractors to conform to the principles outlined in the Code in their relationships and dealings with the Company. If this causes difficulties, the Company will work with them to resolve any issues arising, and if it fails, the Company will find other parties who can meet the Company’s business standards.

The Business Partner will provide all possible assistance to investigate any possible instances of unethical behavior or Code of Conduct violations by an employee of Mobitel or an employee of the Business Partner.

The Business Partner will disclose forthwith any breach of the Mobitel Code of Conduct that comes to its knowledge.

Open Door Practice

If Vendors or any business parties have any concern, query, knowledge or information about any unethical business practices taking place in the Company, they are expected to take appropriate and consistent action by informing the Ethics Hot Line. All correspondences with the Ethics Hot Line would be treated in the strictest confidence unless required to be declared under law.

Ethics Hot Line of Mobitel (Pvt) Ltd can be contacted via:

- a) Telephone : 071-4296227 (Internal Auditor Mobile No)
- b) E-mail : EthicHL@mobitel.lk
- c) Address : Internal Auditor, ERM Division, Mobitel Pvt Ltd, 108, W. A. D. Ramanayake Mw, Colombo 2

1.1 Assets and Properties

- a) Vendors are responsible to protect the Company’s assets and property entrusted to them from any loss, damage, misuse, illegal use or theft.

- b) The Company's assets and property, such as funds, products and services, vehicles, access and security cards, office equipment or facilities, may only be used for official business purposes and such other purposes as may be approved by the Company.
- c) The Company's assets and property cannot be used for personal reasons and should not be taken out of Company's premises, unless it is for official Company business purposes and with prior authorization, where required.

1.2 Information protection

- a) Vendors must safeguard all information by marking information accordingly, keeping it secure, and limiting access to those who have a need to know in order to do their jobs.

1.3 Other Business Interest / Employment

- a) Vendors must disclose to the CEO Office, if a family member or close relative of the Vendor is working as a staff member of Mobitel.

1.4 Giving and Receiving Of Business Courtesies

Vendors must not give kickbacks, gifts or gratuities in any form. This includes the clear message that the Company will not accept business courtesies whether directly or indirectly except in situations that are considered as business norms or courtesies channeled through CEO Office. Examples of courtesies that are considered as business norms may include:

- Sending of flowers or gifts of similar nature on special occasions related to business or culture.
 - Exchanging of gifts during corporate visits and signing ceremonies.
 - gifts given at Company functions
- a) Vendors must not give or extend gifts, loans or other benefits to Company Employees to get sales or beneficial arrangements.
 - b) Vendors must not solicit, ask for, nor accept, gifts on behalf of the Company even for legitimate purposes such as training or sponsorship of any sporting or welfare events unless authorized by the CEO Office of the Company.
 - c) For the purposes of this Code, business courtesies include tangible or intangible benefits including items such as cash, cash equivalent (stocks, bonds, options and other similar items), non-monetary gifts, meals, drinks, entertainment, recreation, door prizes, tickets, passes and other promotional items.
 - d) Any attempts to provide gratification to any Mobitel employee will be viewed in a very serious manner and where there is confirmation of such instances, it may lead to:
 - a. Cessation of all business dealings with Mobitel.
 - b. Blacklisting with Mobitel and its associates for any future business.
 - c. Levy of a financial penalty.
 - d. Reporting of matter to law enforcement agencies.
 - e. Appropriate legal action, where necessary.
 - e) Gifts of any value should be channeled through the CEO Office. Gifts must not be sent directly to Company employees home.

1.5 Fraud

- a) Fraud applies to any irregularity or suspected irregularity related to Company business and involving Vendors or persons providing service or materials to the Company. Irregularities include, but are not limited to, the following:

- 1. Forgery or alteration of any document
- 2. Misappropriation, destruction, or disappearance of funds, inventory, supplies or other Company assets, whether tangible or intangible
- 3. Impropriety in the handling or reporting of financial transactions
- 4. False, fictitious, or misleading entries or reports
- b) Vendors must immediately report any suspected irregularity or act of fraud to the Ethics Hotline Office.
- c) Vendors must cooperate with any investigation and provide accurate and truthful information.

1.6 Competitors

1.6.1 Maintaining ethical practices in a competitive environment

- a) Vendors must never use any illegal or unethical methods to gain a competitive advantage (including obtaining information about the vendor’s competitors)
- b) The Vendor should sell and promote its products and services fairly and honestly
- c) The Vendor should not use tactics that will unfairly undermine the products of a competitor
- d) Comparative advertising may only be used when comparing the vendor’s products against the competitor’s own statements about their products

All business partners are required to confirm their compliance to Ethical dealings on an annual basis, by signing the below declaration to the effect that the business partner has complied with the Mobitel Code of Business Practice in all their dealings with the Company.

Declaration by Business Partner

I read and understood the aforesaid Ethics and Code of Business Practice and agree to abide by the same.

I further declare that none of the Directors of <Name of the Company> are related to any staff member at Mobitel other than those disclosed in below table.

EMP #	EMP Name	Division	Designation

Date: _____

Place: _____

(Signature & Name of Signing Authority)

(Company Seal Mandatory)