

	DILMAH WORKPLACE CONDUCT & DIGNITY POLICY	Issuing Department: HR Issued Date: 08.06.2010 Revised Date: 01.03.2026 Revision No: 04
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DILMAH WORKPLACE CONDUCT & DIGNITY POLICY

1. Purpose of This Policy

The purpose of this Dilmah Workplace Conduct and Dignity Policy (“Policy”) is to ensure all employees of Dilmah Ceylon Tea Company Plc (hereafter “Dilmah”) work in an environment that is safe, respectful, professional, and free from harassment, discrimination, and abusive conduct.

This Policy is aligned with Dilmah’s broader commitment to respect human rights, including internationally recognised laws/principles encompassed in the Universal Declaration of Human Rights, the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact, the United Nations Guiding Principles and local laws on Business and Worker Rights.

Summary: This Policy protects dignity at work and establishes expectations for respectful and professional behaviour.

2. Objectives

Dilmah is focused on identifying, preventing, and mitigating adverse human rights impacts resulting from or caused by or may occur through its business activities.

Dilmah’s key targets for workplace conduct are;

- To ensure 100% of Dilmah employees are aware of and are trained on the key principles of this Policy within 3 months of its implementation and/or any amendments/ revisions/ updates thereof.
- To maintain zero work-related employee fatalities annually.
- To maintain zero child labour, forced labor or human trafficking related incidents annually.
- To provide adequate medical benefits for all employees to support employee health and wellbeing.
- 100% compliance with workman’s compensation standards in line with statutory requirements.
- To ensure timely and effective investigation of 100% of reports lodged by Employees under this Policy.
- To ensure timely and effective investigation of 100% of reports lodged by external stakeholders under this policy.
- To close such investigations under this policy within three (3) months.
- To conduct annual employee engagement or culture surveys, with a target of ≥ 80% positive response rate on workplace respect and safety indicators.
- To provide a platform for employees for a social dialogue at least quarterly. This meeting will provide a platform for employees to meet with the Board of Directors and directly to propose their suggestions, ideas, grievances.

3. Scope & Applicability

This Policy applies to;

- Dilmah employees and consultants at all levels
- Directors and officers
- trainees and interns
- café operators and retail staff

We are committed to working with and encouraging our suppliers, distributors and customers to uphold the principles in this Policy and to adopt key principles of this policy within their businesses.

We encourage and monitor our supply chain partners to assess that their operations, practices, and management systems are aligned with the key expectations and commitments outlined in this Policy. We use tools such as Supplier Capability Assessments, Supplier Evaluations, and Supplier Audits periodically, as applicable, to monitor and evaluate adherence to the requirements and commitments outlined in this Policy across our supply chain partners.

This Policy covers conduct that occurs:

- on Company premises
- at factories, warehouses, and retail outlets
- off-site during travel or training
- at meetings, events, conferences, or gatherings
- online or through digital communication platforms

Upon joining Dilmah, all internal stakeholders will be introduced to this Policy and other related policies, which govern conduct in the places specified above. All parties must familiarize themselves with these policies and comply with them at all times.

Summary: The Policy applies to all individuals representing Dilmah, in all work-related settings and interactions.

4. Community and Stakeholder Engagement

Dilmah recognizes its impact on the communities in which it operates and is committed to conducting business in a manner that respects the rights and interests of its external stakeholders.

As such Dilmah shall:

- respect the rights of local communities, including land and resource rights;
- engage with all stakeholders in a transparent and responsible manner;
- consider environmental, social, and human rights impacts when making its business decisions;
- conduct dialogue on relevant environmental, social, and human rights matters where appropriate;
- undertake human rights impact assessments where necessary.

Dilmah is committed to addressing local issues at the appropriate level and to fostering positive, long-term relationships with external stakeholders. The Company also supports community development through initiatives that promote economic opportunity, social inclusion, and environmental sustainability, through programs implemented by MJF Charitable Foundation and Dilmah Conservation.

Summary:

Dilmah engages responsibly with communities, respects stakeholder rights, and supports sustainable community development through structured engagement and initiatives.

5. Respectful Conduct & Expected Behaviour

Everyone at Dilmah is expected to demonstrate professionalism, courtesy, and respect in all interactions. Expected behaviour includes:

5.1 Professionalism

- treating others with courtesy and fairness
- listening respectfully and addressing disagreements constructively
- valuing diversity of thought and background

5.2 Responsible Communication

- using clear, respectful language
- avoiding hostile, offensive, or intimidating remarks
- keeping discussions focused on issues rather than individuals

5.3 Team Collaboration & Integrity

- supporting colleagues and encouraging positive teamwork
- honouring commitments
- avoiding gossip, rumours, or behaviour that undermines trust

5.4 Leadership Responsibilities

Leaders and supervisors must model respectful behaviour and ensure their teams feel safe to raise concerns.

Summary: Everyone must act with professionalism, respect, courtesy, and integrity in all workplace interactions.

6. Harassment, Discrimination & Abusive Conduct

We do not tolerate any form of harassment, discrimination, intimidation, or abusive behaviour. Dilmah maintains **zero tolerance** for disrespectful conduct.

This includes conduct that is:

- verbal, physical, visual, written, or digital
- direct or indirect

6.1 Harassment

Harassment includes behaviour that creates a hostile, humiliating, or intimidating environment, such as:

- derogatory jokes or comments
- unwanted physical contact
- offensive gestures, messages, or images
- repeated unwanted interactions

6.2 Sexual Harassment

Sexual harassment includes:

- unwelcome advances or requests
- sexualised comments or innuendo
- display or sharing of inappropriate materials
- any behaviour that places pressure on someone to engage in sexual conduct

6.3 Discrimination

Dilmah prohibits discrimination based on:

- race, ethnicity, or nationality
- religion or belief
- gender or gender identity
- age
- sexual preference
- disability or medical condition
- marital status or family situation
- any other protected characteristic under applicable law

Accordingly, at Dilmah, all decisions regarding recruitment, hiring, placement, training, compensation, and advancement are based on qualifications, performance, skills, and experience—assessed through quarterly appraisals conducted via the Employee Performance Management System, which is founded on transparency, accountability, and performance.

6.4 Abusive Conduct

This includes:

- bullying, shouting, or verbal aggression
- threats or intimidation
- misuse of authority
- conduct intended to belittle, isolate, or undermine another person

Summary: Any behaviour that demeans, intimidates, humiliates, or discriminates against another person is strictly prohibited.

7. Responsible Use of Technology & Digital Conduct

Employees must use Company systems, email accounts, messaging tools, and digital platforms responsibly. Inappropriate behaviour includes:

- sending offensive, threatening, or discriminatory messages
- sharing unverified rumours or harmful content
- accessing or distributing inappropriate material
- using Company systems to harass or intimidate others
- discussing sensitive workplace matters in open or unprotected channels

Digital conduct is part of workplace behaviour and is subject to the same standards set out in this Policy.

Summary: Digital communications must be respectful and appropriate — misconduct online is misconduct at work.

8. Social Media & External Communications

Employees must exercise caution when posting online or making public statements. The following is prohibited:

- unauthorised use of confidential or internal information
- making statements/comments that harm the Company's reputation
- making derogatory statements/comments with express or implied reference to company's employees or external stakeholders
- identifying oneself as a Dilmah representative unless authorised
- posting offensive, discriminatory, or hostile content
- engaging in online disputes that implicate Dilmah

Employees with roles involving external communication must follow approved guidelines and coordinate with the appropriate departments.

Summary: Social media and public statements must not disclose confidential information or damage Dilmah's reputation.

9. Misuse of Company Assets & Resources

Company assets including equipment, vehicles, tools, funds, documents, IT systems, and brand materials must be used responsibly and only for authorised business purposes.

Misuse includes:

- personal use without permission
- unauthorised removal of Company property
- falsifying expense claims
- improper use of brand materials or designs
- allowing unauthorised individuals access to Company assets

Intentional misuse may constitute misconduct and lead to disciplinary action.

Summary: Company assets must be used responsibly and only for legitimate business purposes.

10. Fair Employment Practices & Working Conditions

Dilmah is committed to holding fair, ethical, and lawful employment practices across its operations. In this regard, the Company will:

- Prohibiting modern slavery including forced labour and human trafficking,
- Prohibiting child labour (under the age of 16 yrs).

- Ensure that young workers (aged between 16 and 18 years) are:
 - not engaged in hazardous work; and
 - employed only in age-appropriate roles under proper supervision, in full compliance with applicable laws in Sri Lanka;
- Ensure fair wages, working hours, and benefits in compliance with applicable laws and industry standards, including:
 - provision of overtime or variable pay for work performed beyond normal working hours;
 - provision of meals and transport, where appropriate;
 - access to employee welfare schemes such as housing loans and welfare loans, subject to agreed terms;
 - progressive assessment of living wage gaps and implementation of measures to improve wage adequacy;
- providing safe and hygienic working conditions
- Track training hours per employee per year as part of employee development initiatives.
- Respecting freedom of association and collective dialogue mechanisms
- Ensure 100% of employees have formal employment documentation/contracts.

Summary: All employment practices must uphold dignity, fairness, and legal compliance.

11. Engaging in Political Activities

All employees are prohibited from the following activities:

- Using the company name or association of the company name/ activities in any political campaign
- Engaging in any form of political activity at the workplace or during work hours with out specific approval of the management, with the exception of voting in an election;
- wearing or displaying at the workplace anything that supports or opposes a candidate or party;
- using company resources for the purposes of any political activity;
- soliciting funds for a party or candidate; and

An employee who chooses to run as candidates in an election must apply for a period of mandatory leave which shall be without pay. This leave of absence will be granted at the sole discretion of the management which shall not be unreasonably withheld.

An employee who is a successful candidate in an election must resign their positions when the election results are finalized.

Summary: any personal political view should be kept personal

12. Supply Chain & Partner Expectations

Dilmah expects its suppliers, contractors, supply chain partners, and distributors who have a direct business relationship with Dilmah to:

- uphold the principles of this Policy
- operate in compliance with human rights and labour standards
- maintain safe and ethical working environments

To achieve the above objectives Dilmah shall;

- Conduct supplier onboarding assessments covering human rights, labour, and ethical practices.
- Target 100% inclusion of ESG clauses in supplier contracts.
- Evaluate supplier compliance through assessments, audits, and engagement processes by using tools such as Supplier Capability Assessments, Supplier Evaluations, and Supplier Audits periodically (as applicable).
- Track and address supplier non-compliance incidents, including corrective action implementation.

Summary: Business partners are expected to meet the same ethical and human rights standards.

13. Workplace Safety & Wellbeing

Dilmah is committed to maintaining a safe, healthy, and supportive environment in all locations where employees work as applicable under legal health and safety requirements, including estates, factories, warehouses, retail outlets, and offices.

In support of this commitment, Dilmah aims to:

- maintain **zero work-related fatalities**
- minimize workplace hazards and risks
- promote employee health and wellbeing, including access to periodic medical support where applicable
- promoting work-life balance and ensuring employees' right to rest
- Monitor and report workplace incident rates, near misses, and corrective actions on a periodic basis.
- Conduct regular safety audits and inspections, with documented corrective action plans.
- Track employee participation in health and safety training programmes, targeting 100% coverage for relevant roles.

Everyone must:

- follow all safety instructions and protocols
- use equipment responsibly
- report hazards or unsafe conditions immediately
- avoid behaviour that endangers themselves or others
- cooperate with safety drills, audits, or inspections

Supervisors must ensure safe working conditions and respond promptly to concerns raised by team members.

The Dilmah Health & Safety Policy has outlined all specific details and procedures relating to Health and Safety.

Summary: Safety is everyone's responsibility, and hazards or unsafe behaviour must be reported immediately.

14. Reporting Misconduct, Harassment & Workplace Concerns

Employees should raise concerns early, especially when they experience inappropriate behaviour, harassment, discrimination, bullying, or breaches of this Policy.

Reports may be lodged via:

- the **Head of Human Resource** or
- a **Manager or Supervisor** or
- **Head of Legal** or
- **Head of Risk and Compliance** or
- the **Company Secretary** or
- the **Whistleblowing channels**, for confidential or sensitive matters

Reports may be made verbally or in writing. Dilmah encourages early escalation so that issues can be addressed proactively.

Summary: Concerns about behaviour or workplace dignity should be raised early through Human Resource, management, or whistleblowing channels.

15. Confidentiality & Protection from Retaliation

All reports will be treated confidentially. Information will be shared only with individuals responsible for handling the concern.

Dilmah prohibits retaliation against any person who:

- raises a concern in good faith
- participates in an investigation
- refuses to engage in inappropriate conduct

Retaliation includes threats, intimidation, exclusion, adverse treatment, denial of opportunities, or dismissal.

Anyone found to have retaliated against another person will face disciplinary action, which may include termination.

Summary: Employees who raise concerns in good faith are protected from retaliation.

16. Investigations & Resolution

Concerns raised under this Policy will be reviewed promptly. The following process generally applies:

16.1 Initial Assessment

Reviews of the report to determine the nature, seriousness, and urgency of the concern.

16.2 Formal Investigation

Shall be carried out where necessary at the discretion of the Company. Such investigations shall be conducted exclusively internally.

This may involve interviews, reviewing documents or messages, examining CCTV (if available), or gathering supporting information for which the Employee must extend their corporation. The Company may engage

professionals/ industry experts/ third parties to facilitate the investigation. The employee shall be entitled to be accompanied by an 'observer' who is also a person within the organization during such investigation.

16.3 Outcome & Actions

Findings are reviewed by Human Resource Department or the Legal Department. Corrective actions may include training, coaching, mediation, disciplinary action, or other steps required to restore a safe and respectful work environment.

16.4 Feedback

Where appropriate and legally permissible, the individual who raised the concern will be informed when the matter has been concluded.

16.5 Investigation Performance Metrics

- Investigations shall be conducted confidentiality in a timely and efficient manner with targeted closure of an investigation within three (3) months.
- Track average time taken to resolve cases and implement improvements where required.
- Maintain proper documentation to demonstrate fair, consistent, and unbiased investigation processes.

Summary: Concerns will be investigated fairly, promptly, and confidentially, with appropriate actions taken to resolve issues.

17. Responsibilities of Managers & Supervisors

Managers and supervisors play a critical role in maintaining a respectful, safe, and supportive work environment. They must:

- model the behaviours expected under this Policy
- address inappropriate conduct promptly
- ensure concerns are escalated without delay
- avoid favouritism, undue pressure, or misuse of authority
- support employees who raise concerns
- ensure work assignments and decisions are fair and transparent

Those who fail to act on known or reported concerns may themselves be subject to disciplinary action.

Summary: Leaders must set the tone, address issues early, and protect employees who raise concerns.

18. Career Management and Training

The Company is committed to supporting employees' career development by providing appropriate training and development opportunities as stipulated in the Training, Development, Competency, Performance and Career Management Policy. Employee career development and training requirements, amongst others are identified through the annual performance management cycle carried out for all staff in employment.

19. Interaction with Other Policies

This Policy must be read alongside:

- Dilmah Business Conduct and Ethics Policy
- Whistleblowing Policy
- Data Protection & Confidentiality Policy
- Anti-Bribery & Corruption Policy
- HR guidelines relating to grievances and disciplinary processes
- Supply Chain Partner Code of Conduct
- Sustainable Procurement Policy
- Dilmah Health and Safety Policy
- Child Labour Remediation Policy
- Training, Development, Competency, Performance and Career Management Policy

Where standards differ, the stricter standard applies.

Summary: This Policy complements Dilmah's wider governance and HR framework.

20. Review, Version Control & Approval

This Policy will be reviewed at least once every three years, or earlier if changes in law, workplace requirements, or internal risk assessments require updates. Human Resource Department coordinates revisions, which are reviewed by the Nominations & Governance Committee and approved by the Board of Directors.

Responsibility for implementation, monitoring, and follow-up actions will be coordinated by the Human Resource Department.

The policy and its updates are communicated internally to all relevant employees and to Dilmah's suppliers during onboarding and will form an integral part of all supplier contracts.

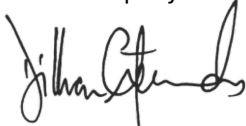
Suppliers are also expected to cascade the core principles to their own subcontractors and partners, ensuring that its principles are applied consistently throughout the wider supply network.

21. Interpretations

"MJF Charitable Foundation" is a Company Limited by guarantee incorporated to carry forward the works undertaken by the said MJF Charitable Trust.

"Dilmah Conservation" is the conservation arm of the Company which concentrates on sustainability and nature conservation.

The Company reserves the right to amend this policy at any time.



Dilhan C Fernando
Chairman