

Anti-Bribery Policy

ISO 37001:2025 ANTI-BRIBERY MANAGEMENT SYSTEM

Document ID	ABMS-POL-001	Version	01
Owner	ABF	Effective date	14 th August 2026
Approved by	Jagath Ravindra	Review date	16 th September 2027
Classification	Internal — Controlled	Status	Approved

1. Purpose and applicability

This controlled template supports the Metropolitan Anti-Bribery Management System. Reference: ISO 37001:2025; applicable Sri Lankan laws and contractual requirements; Metropolitan ABMS Manual and controlled registers.

Purpose

State Metropolitan's zero-tolerance position and the mandatory principles governing bribery prevention, detection and response.

Policy statement

Metropolitan prohibits bribery in any form, whether direct or indirect, including offering, promising, giving, requesting or accepting an improper advantage. This policy applies even where a payment or benefit is described as customary, facilitation, commission, gift, hospitality, donation or sponsorship.

Commitments

Metropolitan commits to comply with applicable anti-bribery laws and this ABMS; establish objectives; provide an independent and adequately resourced Anti-Bribery Function; apply proportionate financial and non-financial controls; encourage good-faith reporting; prohibit retaliation; investigate concerns; and continually improve the ABMS.

Required conduct

Personnel and business associates acting for Metropolitan shall not offer, authorize, request or accept bribes; shall disclose conflicts; follow approval limits; keep accurate records; complete due diligence and training; and promptly report suspected bribery or control weaknesses.

Speak-up and protection

Reports may be made through: [hotline/email/web/manager/ABF channels]. Reports may be anonymous where legally permitted. Good-faith reporters and cooperating persons shall be protected from retaliation.

Consequences and authority

Breaches may lead to disciplinary, contractual, civil or criminal action. No person will be penalized for refusing to participate in bribery, even if the refusal causes lost business. The Anti-Bribery Function has direct and prompt access to the Governing Body and Top Management.

Communication

Audience: [employees / controlled organizations / relevant business associates]. Methods and languages: [Website, Intranet].

Responsibilities and escalation

Document owner: ABF

Responsible users: Relevant business functions

Required consultation: ABF, Legal, Finance, Procurement, Internal Audit

Escalation authority and timing: Head of the relevant function / ABF; escalate identified red flags or high-risk matters before approval or continuation.

Related forms, registers and evidence

Related workbook worksheet(s): Business Associate Due Diligence Register

Supporting records/evidence: Completed due diligence forms and supporting documents

Storage location: ABMS Document Repository

Retention period: As per the approved Records Retention Schedule

Access restriction: Authorized personnel only

Document approval and revision history

Version	Date	Change summary	Prepared by	Reviewed by	Approved by
1	14 th August 2026	Policy statement change	ABF	ABF Head	Governing Body

*Retention and disposal: retain the approved version and superseded versions in accordance with the approved Records Retention Schedule.
Prevent unauthorized alteration or destruction.*