



WIGTON WINDFARM LIMITED

WHISTLEBLOWING POLICY

November, 2021

1. **Policy Statement**

Wigton Windfarm Limited (“Wigton” or the “Company”) was established in April 2000 under the Companies Act of Jamaica as a subsidiary of the Petroleum Corporation of Jamaica (PCJ), which was the Government of Jamaica (GOJ) entity with responsibility for energy security. Wigton was mandated to develop and operate renewable energy systems on a utility scale to supply electricity to the national grid.

In 2017 the GOJ took the decision to divest Wigton via an initial public offering on the Jamaica Stock Exchange (JSE) and this exercise was successfully completed in May 2019. As a listed company on the main market of the JSE, Wigton has transitioned from a public sector entity to a private sector company governed by the JSE Rules.

Wigton is committed to conducting its business with honesty, professionalism and integrity and expect all employees to maintain high ethical standards and report any suspected wrongdoing. It is in this regard that the Board of Directors of Wigton has approved the Whistleblowing Policy (hereinafter referred to as “the Policy”) to set out the guidelines and procedures in the reporting of such suspected wrongdoing.

2. **Definitions**

2.1. “Whistleblowing Officer” means such officer or person designated by the Committee of the Board with responsibility for human resources from time to time.

3. **Scope**

3.1. This Policy applies to all employees of Wigton. Its purpose is to foster employees in the making of specified disclosures in the interest of the public as well as to regulate the procedure for receiving, investigating, or otherwise dealing with disclosures of improper conduct.

3.2. The policy protects employees who make the specified disclosures from being subject to occupational detriment and related matters.

4. **Whistleblowing**

4.1. Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to Wigton’s or its employee’s activities. This includes bribery, facilitation of tax evasion, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment, unauthorised disclosure of confidential information, breach of Wigton’s internal policies and procedures, including the Code of Ethics and Guidelines for Business Conduct, any breach of legal or professional obligations or acts of reprisal against or victimisation of any employee.

4.2. Whistleblowing does not include grievances regarding terms and conditions of employment and other aspects of established working conditions unless related to retaliation against whistleblowers.

- 4.3. A whistleblower is an individual who raises a genuine concern relating to any of the matters identified at 4.1 above or similar matters. If there is a genuine concern related to suspected wrongdoing or dangers in relation to Wigton's or its employee's activities this should be reported in accordance with this Policy.

5. Raising a Whistleblowing Concern

- 5.1. Wigton expects that its employees will feel free and be willing to voice whistleblowing concerns openly under this Policy and may do so to the Whistleblowing Officer or one of the other contact points listed in 5.4 below in writing or verbally.
- 5.2. In all cases employees will be able to raise any concerns with their managers. However, where employees prefer not to raise concerns with their managers for any reason whatsoever, they may contact the designated Whistleblowing Officer.
- 5.3. Upon a disclosure, the Whistleblowing Officer will complete an initial assessment, investigate the disclosure, as necessary, and submit all relevant information in this regard to the Committee of the Board with responsibility for human resources.
- 5.4. Where a disclosure is regarding the Whistleblowing Officer, the whistleblower has the right to take his/her disclosure directly to the Committee of the Board with responsibility for human resources, through the Chairman or to the Board of Directors, through the Chairman or Company Secretary. The Committee of the Board with responsibility for human resources or the Board has the right to refer the disclosure back to management if same may be appropriately investigated without any conflict of interest.

6. Confidentiality

- 6.1. While disclosures may be made anonymously or confidentially, Wigton does not encourage employees to make anonymous disclosures as proper investigation may be more difficult or impossible if further information cannot be obtained from the whistleblower.
- 6.2. Wigton will treat all disclosures in a confidential and sensitive manner. Every effort will be made to keep the identity of the whistleblower confidential and such identity will only be revealed where it is absolutely necessary and, solely in an effort, not to hinder or frustrate any investigation.
- 6.3. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Whistleblowing Officer or one of the other contact points listed in 5.4 above so appropriate measures may be taken to preserve confidentiality.

7. Investigation and Outcome

- 7.1. Where an employee raises a concern, the Whistleblowing Officer will carry out an initial assessment to determine the scope of any investigation. The whistleblower

may be required to attend additional meetings in order to provide further information. The whistleblower will be informed of the outcome of the initial assessment.

- 7.2. Where the Whistleblowing Officer determines that the disclosure is to be investigated, in some cases Wigton may appoint an investigator or team of investigators including employees with relevant experience of investigations or specialist knowledge of the subject matter.
- 7.3. Investigations into a disclosure made under this Policy will be carried out fairly and impartially. The Whistleblowing Officer and/or investigator(s) conducting the investigation has a duty to ensure that the rights of the whistleblower, any witness and any person alleged to be at fault are protected.
- 7.4. In any meeting held pursuant to this Policy, the whistleblower and the person alleged to be at fault will be entitled to be accompanied by his/her representative of choice, to include an attorney, colleague or friend.
- 7.5. Wigton will endeavour to keep the whistleblower informed of the progress of the investigation and its likely timeframe. However, the need for confidentiality may prevent the sharing of specific details of the investigation or any planned action.
- 7.6. Following the investigation, the Whistleblowing Officer should, to the extent practicable, take steps to remedy any improper conduct; provide or procure the provision of redress, where appropriate, take disciplinary action or procure the taking of disciplinary action, where appropriate, as far as possible, reduce the opportunity for recurrence of the improper conduct and/or make recommendations regarding any measures to be taken to remedy the improper conduct.
- 7.7. In making a disclosure, employees should exercise due care to ensure the accuracy of the information he/she provides and that it is made in good faith.

8. External Disclosures

- 8.1. The aim of this Policy is to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace.
- 8.2. The law recognises that in some circumstances it may be appropriate for employees to report concerns to an external body. Wigton strongly encourages employees to seek legal advice before reporting a concern to an external body.

9. Retaliation

- 9.1. Wigton's aim is to encourage openness and will support whistleblowers who raise genuine concerns under this Policy in good faith and under the reasonable belief that the disclosure tends to show malpractice or impropriety, even if they turn out to be mistaken.
- 9.2. Whistleblowers will not suffer any detrimental treatment as a result of raising a genuine concern. Detrimental treatment includes, but is not limited to, dismissal,

suspension or demotion; harassment, intimidation or victimization; transfer against will; refusal of a transfer or promotion; or threats in relation to any of the foregoing.

- 9.3. An employee who believes he/she has suffered any detrimental treatment should inform the Whistleblowing Officer or one of the other contact points listed in 5.4 above immediately. If the matter is not remedied, employees should raise it formally using the Company's Grievance Procedure.
- 9.4. Employees must not threaten or retaliate against whistleblowers in any way. Any employee involved in any such conduct will be subject to disciplinary action.

10. Records

The Whistleblowing Officer is responsible for maintaining a record of the number and types of whistleblower disclosures made throughout the Company in order to keep track of these and be able to analyse trends and take the appropriate actions.

11. Policy Review

- 11.1. This Policy shall be reviewed at least every two (2) years by the Committee of the Board with responsibility for human resources and the Corporate Governance Committee, or as regularly as is required, for the purpose of updating the Policy to reflect changes in best practices and to enhance its effectiveness. Any amendments to the provisions of this Policy must be submitted to the Board of Directors for consideration and approval.
- 11.2. Employees will be invited to comment on this Policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Whistleblowing Officer and the Chairperson of the Committee of the Board with responsibility for human resources or the Corporate Governance Committee.

DOCUMENT CONTROL

Version	Date	Date Approved by Board	Area Changes made
1 st	November 10, 2021	November 10, 2021	N/A