

# THE UNION SUGAR ESTATES COMPANY LIMITED

## WHISTLE BLOWING POLICY

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The Union Sugar Estates Company Limited ('USE' or 'the Company') is committed to the highest standards of transparency and accountability in line with good corporate governance. This whistle blowing policy (the "Policy") provides strict confidentiality and protection to employees for any disclosure made without malice and in good faith. The purpose of this Policy is to provide a mechanism for employees to raise concerns anonymously under certain circumstances.

### 1. Guidelines

- a. This Policy is designed to deal with concerns raised in relation to specific issues as outlined below:
  - i. Criminal offence;
  - ii. Financial or non-financial mismanagement, fraud and corruption, including bribery;
  - iii. A risk (including a potential risk) to health and safety of any individual; and
  - iv. Behavior which is unethical in terms of the USE Group Code of Ethics.
- b. Employees should only use the whistle blowing procedure after having exhausted all of the internal USE Group policies and procedures except if the employee believes and has a sound basis for believing that following set policies and procedures will lead to victimization.
- c. This Policy does not apply to personal grievances concerning an individual's terms of employment, other aspects of the working relationship, or relationships between employees or disciplinary matters.
- d. Following an investigation should it be found that the concerns raised was untrue then appropriate actions would be taken against that person.

### 2. Procedures

- a. Concerns must be raised without malice, must be in good faith and not based on office gossip nor must it be made for purposes of personal gain.
- b. The individual making the disclosure must reasonably believe that the information and the allegations contained therein are substantially true and provide all information and substantiating documentation.
- c. An employee, who has a reasonable belief that there is serious misconduct relating to any of the above matters, may raise a concern as per the procedures set out.
- d. Employees may email or phone the Chairman of the Corporate Governance Committee or the Chairman of the Board directly to disclose their concerns.
- e. On receipt of the communication, the recipient of the compliant, namely the Chairman of the Corporate Governance Committee or the Chairman of the Board shall take a decision as to whether there is a prima facie case to respond to the 'concern' raised.



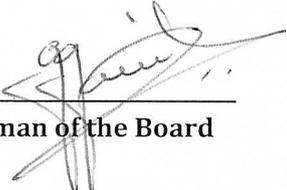
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- f. An investigation may be recommended and depending on the nature of the matter, he/she may recommend that the matter be:
- i. Investigated internally;
  - ii. Referred to External Auditors; or
  - iii. Subjected to an independent enquiry.
- g. All disclosures and subsequent actions taken shall be reported and approved by the Board of USE.

Approved on ..... 27<sup>th</sup> March 2023 .....

  
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Chairman of the Board

  
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Company Secretary