SEXUAL AND OTHER UNLAWFUL HARASSMENT POLICY

LASCO MANUFACTURING LIMITED					
Policy	SEXUAL AND OTHER UNLAWFUL HARASSMENT				
Policy #	LML Policy #: LML/HR019	Version #	002	Responsible Department	HUMAN RESOURCES
Approved by:	Managing Director	Approval Date*	2018 FEBRUARY 26	Revised Date:	January 2020
Approved by:	Board of Directors	Approval Date:	2026 JULY 30	Revised Date:	October 30, 2020

This policy is formulated with reference to the Protected Disclosures Act, 2011 (Government of Jamaica), guidance issued by the Integrity Commission of Jamaica, and statutory requirements under the Sexual Harassment Protection and Prevention Act of 2021.

1. PURPOSE AND POLICY STATEMENT

1.1 LASCO Manufacturing Limited (collectively, the "Company"), is committed to providing a safe, respectful, and inclusive work environment free from sexual harassment and other forms of unlawful harassment.

1.2 The Company adopts a zero-tolerance approach to sexual harassment and other unlawful harassment. All complaints shall be taken seriously, handled promptly, and investigated fairly and impartially.

1.3 This Policy supports the Company's commitment to dignity, equality, integrity, and good corporate governance, and is intended to comply with applicable Jamaican law and recognized governance standards.

2. SCOPE AND APPLICATION

2.1 This Policy applies to all directors, officers, employees, contractors, consultants, agents, suppliers, customers, business partners, casual workers, visitors, and any other person engaged in, or interacting with, the Company ("Covered Persons").

2.2 This Policy applies regardless of position, seniority, gender, contractual status, or location.

2.3 This Policy applies to conduct occurring:
(a) on Company premises;
(b) during working hours;
(c) at Company-sponsored events, training, conferences, or business travel; and
(d) outside the workplace where the conduct has a connection to employment or the Company's business.

3. OWNERSHIP, OVERSIGHT, AND GOVERNANCE

3.1 This Policy is issued under the authority of, and approved by, the Board of Directors of LASCO Manufacturing Limited.

3.2 The Board of Directors retains ultimate responsibility for the ownership, oversight, interpretation, and effectiveness of this Policy.

3.3 Oversight of matters arising under this Policy shall ordinarily fall within the remit of the Board Committee responsible for corporate governance or such other Committee as the Board may designate.

3.4 Management and the Human Resources function are responsible for the day-to-day administration of this Policy, under the direction and oversight of the Board of Directors or the appropriate Board Committee.

4. DEFINITIONS

4.1 Sexual Harassment means any unwelcome conduct of a sexual nature, whether physical, verbal, non-verbal, visual, or electronic, that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment.

4.2 Sexual harassment includes, but is not limited to:
(a) unwelcome physical contact, including patting, touching, hugging, kissing, or fondling;
(b) sexual assault or physical violence of a sexual nature;
(c) requests, demands, or pressure for sexual favours;
(d) sexual comments, jokes, remarks, or innuendos;
(e) unwelcome comments about appearance, gender, age, or private life;
(f) sending sexually explicit or suggestive messages or images;
(g) display of sexually explicit or suggestive material;
(h) repeated and unwanted social or sexual invitations;
(i) sexually suggestive gestures, staring, leering, or whistling; and
(j) use of threats, promises, or employment-related benefits in exchange for sexual conduct.

4.3 **Other Unlawful Harassment** means any unwelcome conduct related to a protected characteristic under applicable law that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment.

4.4 Harassment may occur between persons of the same or different genders and may involve persons at any level within or outside the Company.

4.5 The determination of whether conduct is unwelcome shall be based primarily on the perception of the recipient.

5. PROHIBITED CONDUCT

5.1 Sexual harassment and other unlawful harassment are strictly prohibited.

5.2 Abuse of power, authority, or position in connection with harassment constitutes an aggravating factor.

5.3 Harassment is prohibited whether it occurs on Company premises or outside the workplace where there is a sufficient connection to employment or Company business.

6. REPORTING OF COMPLAINTS

6.1 Any person who experiences or witnesses sexual harassment or other unlawful harassment is encouraged to report the matter promptly.

6.2 Complaints may be reported via primary and secondary channels consistent with the reporting process in the Company's Whistleblower Policy:

(a) Primary channels

- The external whistleblowing service provider
- The Chairman of the Audit and Risk Management Committee

(b) Secondary channels

- The General Manager or Managing Director
- The Human Resources Manager / Department

If the complaint is received by the secondary reporting channels the matter is to be escalated to the Chairman of the Audit and Risk Management Committee. Where the complaint involves senior management or a director; the complaint is to be escalated to the Board Secretary or other reporting channels as may be communicated by the Company.

6.3 Where a complaint involves senior management, a director, retaliation, systemic misconduct, or presents a material governance or reputational risk, the matter shall be escalated to and overseen by the appropriate Board Committee and may also be reported and handled in accordance with the Company's Whistleblower Policy.

6.4 Complaints may be made verbally or in writing. Written complaints are encouraged where practicable.

6.5 Receipt of complaints is to be acknowledged within 24 – 48 hours after submission and followed by a period of investigation and ultimately, resolution.

7. CONFIDENTIALITY AND NON-RETALIATION

7.1 All complaints, investigations, and related information shall be treated as strictly confidential and disclosed only on a need-to-know basis.

7.2 The Company strictly prohibits retaliation, victimization, intimidation, or adverse treatment against any person who, in good faith, reports harassment or participates in an investigation.

7.3 Retaliation constitutes a serious breach of Company policy and may result in disciplinary action up to and including termination of employment or contract.

7.4 Retaliation against a person who reports harassment or participates in an investigation shall be treated with the same seriousness as retaliation under the Company's Whistleblower Policy.

7.5 Complaints made maliciously, vexatiously, or with knowledge of their falsity constitute misconduct and may result in disciplinary action. This provision shall not deter good-faith complaints.

7.6 Nothing in this Policy prevents a complainant from making a protected disclosure to a regulator or law enforcement authority in accordance with applicable law, or from raising a complaint under the Company's Whistleblower Policy where the circumstances meet the reporting thresholds under that Policy.

8. INVESTIGATION PROCEDURES

8.1 All complaints shall be assessed promptly and investigated fairly and impartially.

8.2 Investigations may be conducted by the external whistleblower service provider to avoid any potential conflict of interest; where appropriate, the matter may be directed to the Human Resources function for further investigation having regard to the seriousness of the allegation.

8.3 Where a complaint involves senior management, a director, or an actual or perceived conflict of interest, the investigation shall be conducted by an independent external investigator under the oversight of the appropriate Board Committee.

8.4 Where a complaint involves senior management, a director, or presents an actual or perceived conflict of interest, the investigation shall be overseen directly by the appropriate Board Committee and conducted by an independent external investigator.

8.5 Both the complainant and the alleged harasser shall be given an opportunity to be heard.

8.6 Investigations shall be conducted with due regard to confidentiality, procedural fairness, and the rights of all parties.

9. INTERIM PROTECTIVE MEASURES

9.1 Pending the outcome of an investigation, the Company may implement interim measures, including temporary reassignment, adjusted reporting lines, administrative

leave with pay, or other protective steps, where necessary to protect the integrity of the investigation or the well-being of the parties involved.

9.2 Interim measures shall not constitute disciplinary action.

10. OUTCOMES AND DISCIPLINARY ACTION

10.1 Where an investigation substantiates a complaint, the Company shall take appropriate remedial and disciplinary action in accordance with applicable policies, employment contracts, and the Progressive Disciplinary Framework.

10.2 Disciplinary action may include:
(a) counselling or training;
(b) warnings or adverse performance evaluation;
(c) reassignment, transfer, demotion, or suspension;
(d) termination of employment or contract;
(e) recovery of damages; and
(f) referral to law enforcement authorities where warranted.

10.3 Serious misconduct, including sexual assault or physical violence, may result in summary dismissal and referral to the police.

11. EXTERNAL COMPLAINTS

11.1 Nothing in this Policy prevents a complainant from pursuing remedies outside the Company, including through the Jamaica Constabulary Force or legal counsel.

12. AWARENESS, TRAINING, AND SUPPORT

12.1 The Company shall take reasonable steps to ensure that all Covered Persons are aware of this Policy.

12.2 Training may be provided to employees, managers, Human Resources personnel, and Board members on recognizing, preventing, and addressing harassment.

12.3 Where appropriate, the Company may offer access to counselling or support services for complainants.

13. POLICY REVIEW

13.1 This Policy shall be reviewed at least once every two (2) years and sooner where required due to changes in law, governance standards, or the Company's operations.

13.2 Any amendments to this Policy shall be subject to approval by the Board of Directors.

14. POLICY HIERARCHY AND BOARD APPROVAL

14.1 In the event of any inconsistency between this Policy and the Company's Whistleblower Policy, the Whistleblower Policy shall prevail for matters involving senior management, directors, retaliation, or systemic misconduct.

14.2 This Policy is issued under the authority of, and approved by, the Board of Directors of LASCO Manufacturing Limited.

14.3 This Policy supersedes all previous Company policies relating to sexual and other unlawful harassment.

15. APPROVAL

Approved for and on behalf of the Board of Directors on the 30th day of July 2026

.....

James E.D. Rawle
EXECUTIVE CHAIRMAN

.....

Vincent A. Chen
COMPANY SECRETARY