LASCO Manufacturing Limited

Whistleblower / Protected Disclosures Policy

LASCO MANUFACTURING LIMITED					
Policy	**WHISTLEBLOWER POLICY**				
Policy #	LML Policy #: LML/HR022	Version #	001	Responsible Department	HUMAN RESOURCES
Approved by:	Managing Director	Approval Date*	March 6, 2018	Revised Date:	January 2020 May 2020
Approved by:	Board of Directors	Approval Date	July 30, 2026	Revised Date:	November 2024
Approved by:		Approval Date		Revised Date:	

1. Purpose and Objectives

1.1 The purpose of this document is to establish secure, confidential, and independent mechanisms through which concerns may be raised regarding suspected fraud, unethical conduct, conflicts of interest, breaches of Company policy, violations of law or regulation, retaliation, or other misconduct that may expose the Company to legal, financial, or reputational risk.

1.2 It reinforces the Company's commitment to integrity, transparency, accountability, and high standards of corporate governance.

1.3 It shall be read and applied together with the Company's Fraud & Ethics Policy, with both documents operating at the same level within the Company's governance framework.

1.4 It further supports compliance with applicable laws and governance standards, including the Jamaica Stock Exchange Corporate Governance Code and the Protected Disclosures Act.

2. Scope and Application

2.1 This Policy applies to all directors, officers, employees, consultants, contractors, agents, suppliers, service providers, and any other persons who have, or have had, a business relationship with the Company ("Covered Persons").

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

2.3 Compliance with this Policy is a condition of employment or engagement with the Company.

3. Status and Interaction with Other Policies

3.1 This document along with the Company's Fraud & Ethics Policy and Sexual and Other Unlawful Harassment Policy are of equal standing and shall be interpreted consistently to give effect to their respective purposes.

3.2 Where any ambiguity or uncertainty arises in interpretation or application, the matter shall be referred to the Board of Directors or the appropriate Board Committee for guidance and determination.

4. Ownership, Oversight, and Responsibility

4.1 This Policy is issued under the authority of, and approved by, the Board of Directors.

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

4.3 Whistleblowing oversight shall ordinarily fall within the remit of the Audit & Risk Management Committee, consistent with listed-company governance practice.

4.4 Management and Human Resources are responsible for the day-to-day administration of this Policy under the direction and oversight of the Board of Directors or the Audit & Risk Management Committee.

5. Definitions

5.1 Fraud has the meaning ascribed to it in the Company's Fraud & Ethics Policy.

5.2 Sexual Harassment has the meaning ascribed to it in the Company's Sexual and Other Unlawful Harassment Policy.

5.3 Whistleblower means any person who, in good faith and with a reasonable belief, reports a Reportable Matter under this Policy.

5.4 Reportable Matter means any concern relating to fraud, unethical conduct, conflicts of interest, breaches of Company policy, violations of law or regulation, retaliation, or other misconduct that may adversely affect the Company.

6. Reportable Matters

6.1 A matter is reportable where a whistleblower reasonably believes, in good faith, that the conduct falls within the scope of Reportable Matters defined in this document.

6.2 A whistleblower is not required to determine whether misconduct has occurred, whether the allegation is ultimately substantiated, or whether the matter warrants investigation.

6.3 The Company encourages the reporting of concerns at an early stage, even where the whistleblower is uncertain as to all the facts.

7. Reporting Mechanisms

7.1 The Company is committed to providing secure, independent, and accessible reporting channels to encourage early reporting and protect whistleblowers.

7.2 Reports shall be made in good faith and with a reasonable belief that the information disclosed is true at the time of reporting.

7.3 **Primary Reporting Channels**

7.3.1 Reports may be submitted to an independent external whistleblowing service provider appointed by the Board of Directors or the Audit & Risk Management Committee. The external provider shall receive, record, and securely transmit reports to the Audit & Risk Management Committee in accordance with agreed protocols.

7.3.2 Reports may also be submitted directly to the Chairman of the Audit & Risk Management Committee, or to such member of the Audit & Risk Management Committee as the Board may designate for this purpose.

7.4 **Secondary Reporting Channels**

7.4.1 Where appropriate, reports may be made to management or Human Resources; however, any such report shall be escalated promptly to the Audit & Risk Management Committee.

7.5 Reports may be made verbally, in writing, electronically, or anonymously, using the reporting mechanisms communicated by the Company from time to time.

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

7.7 Internal Audit shall not serve as the primary intake channel for whistleblower reports. Internal Audit may be appointed by the Board of Directors or the Audit & Risk Management Committee to investigate Reportable Matters following intake through the approved channels.

7.8 Nothing in this Policy limits the right of a whistleblower to make a protected disclosure to a regulator or authority in accordance with applicable law.

8. Confidentiality

8.1 All whistleblower reports, disclosures, investigations, working papers, findings, and related information shall be treated as strictly confidential.

8.2 Disclosure of information shall be limited to persons who have a legitimate business need to know, including the Board of Directors, the Audit & Risk Management Committee, Legal Counsel, external investigators, regulators, or law enforcement authorities, as appropriate.

8.3 The identity of a whistleblower shall be fully protected, subject to the requirements of law and the need to conduct a fair and effective investigation.

9. Investigation Authority and Procedures

9.1 The determination of whether a whistleblower report warrants investigation rests with the Audit & Risk Management Committee, or the Audit & Risk Management Committee Chair or designated member, following initial assessment.

9.2 Initial assessment shall determine whether the matter falls within the scope of this document, the credibility of the information provided, and the potential legal, financial, operational, or reputational risk to the Company.

9.3 Investigations shall be conducted only where authorized by the Audit & Risk Management Committee or its designee.

9.4 Investigations may be carried out by an independent external investigator, the Company's outsourced internal audit service provider, or such other independent party as approved by the Audit & Risk Management Committee.

9.5 Internal Audit shall not determine reportability or whether a matter warrants investigation and shall act solely in an investigative capacity when appointed.

9.6 Investigation findings shall be reported directly to the Audit & Risk Management Committee and, where appropriate, to the Board of Directors.

10. Protection Against Retaliation

10.1 The Company strictly prohibits retaliation, harassment, intimidation, victimization, or adverse treatment against any whistleblower who reports a concern in good faith.

10.2 Any act of retaliation constitutes a serious breach of Company policy and may result in disciplinary action, up to and including termination of employment or contract.

10.3 Protection under this Policy does not extend to reports made maliciously or with knowledge of their falsity.

11. Disciplinary Action and Remedial Measures

11.1 Where an investigation substantiates misconduct, disciplinary and remedial measures shall be taken in accordance with the Company's Fraud & Ethics Policy, Human Resources policies, employment contracts, and the Delegation of Authority Schedule.

11.2 Investigators shall have no authority to impose disciplinary action but may make recommendations to management, the Audit & Risk Management Committee, or the Board of Directors.

12. Record Keeping

12.1 Records relating to whistleblower reports and investigations shall be securely maintained by the external whistleblowing service provider, outsourced internal audit service provider, or such other party as designated by the Board or Audit & Risk Management Committee.

12.2 Records shall be retained in accordance with applicable law and the Company's record retention policies.

13. Policy Review

13.1 This Policy shall be reviewed at least once every two (2) years, or sooner where required due to changes in law, regulation, operations, or risk profile.

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. Board Approval

15.1 This document is issued under the authority of, and approved by, the Board of Directors.

15.2 It takes effect from the date of approval and supersedes all previous whistleblowing or protected disclosures policies.

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

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James E.D. Rawle
EXECUTIVE CHAIRMAN

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Vincent A. Chen
COMPANY SECRETARY