

Legal and Ethical Employment Practices

This policy provides details of the background and legal framework that guides and informs employment practices within the Jamalco organization, which will interchangeably be referred to as (the Company or the Organization).

1.0 BACKGROUND

Being a Jamaica-based organization, Jamalco is required to adhere to all relevant local labour laws. Furthermore, Jamaica has ratified several International Labour Organization (ILO) conventions related to decent work including the Freedom of Association; Protection of the Right to Organize, and the Right to Collective Bargaining. For Jamalco to remain compliant as an employer in the Jamaican context, the organization must adhere to all legal and ethical practices prescribed by and handed down by the Government of Jamaica, specifically the Ministry of Labour and Social Security and the Ministry of Finance. These must be demonstrated through the development and adoption of prescribed practices, the adoption and development of required policies and programs to ensure social protection for all workers, international compliance and sustainable employment and management practices.

Critical requirements are detailed and referenced through this policy document and are delineated under the general rubrics Legal or Ethical Considerations.

2.0 LEGAL CONSIDERATIONS:

Minimum Age of Employment

Jamalco's hiring practices conform to the International Labour Organization (ILO) conventions for minimum age and child labour, of which Jamaica is a signatory. Consistent with the Jamaican labour law, the Labour Relations and Industrial Disputes Act, full-time employees must be at least 18 years old at the time of their engagement with the organization.

This is determined by the Company's pre-employment requirement for each prospective employee to submit a certified copy of their birth certificate before they are offered employment status. This applies in the case of full-time employees, part-time employees, contracted labour and summer interns.

Jamalco complies with all local applicable laws and regulations relating to the hiring of children and does not employ children or support the use of child labour. In keeping with the organization's corporate social responsibility mandate, Jamalco encourages internships and

apprenticeship programmes designed to foster capacity building among post-secondary level students.

Equal Employment Opportunity Policy

This policy is applicable to all Jamalco employees and directly engaged contractors including Summer Interns. In accordance with the organization's People Values, "We inspire and grow our people, reward positive contribution and foster respectful, inclusive and supportive workplace". Jamalco provides a respectful and inclusive work environment where employees, contractors and applicants should not be discriminated against or treated unfairly based on non-job-related characteristics such as:

- Race, colour, ethnicity, or national origin
- Gender, gender identity or expression
- Age
- Sexual orientation
- Marital status
- Pregnancy
- Religion
- Disability
- Military or Veteran status
- Genetic Information
- Any other legally protected status

Jamalco's Human Rights Policy

This policy applies to all Jamalco work sites, affiliates, partnerships, ventures and other business associations with which the organization engages directly or indirectly and all directors, officers and employees of the Company.

Jamalco acknowledges its responsibility to respect human rights and regards it as fundamental to the sustainability of the Company and the communities in which we operate. The Jamalco organization is committed to ensuring that people are treated with dignity and respect.

Our Values (acting with integrity; maintaining respectful and safe environmental practices; caring for people; fostering sustainable communities and delivering excellence in results and to our customers) provide a framework for our decisions, actions and behaviours. The Company's values serve as a universal language that transcend culture and geography. Living these values requires us to meet the highest standards of corporate behaviour in all aspects of business.

Jamalco is committed to abiding by international human rights principles encompassed in the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact and the United Nations Guiding Principles on Business and Human Rights.

Jamalco complies with applicable local and international legal requirements. Where local law conflicts with the principles contained in this Human Rights Policy, Jamalco complies with local requirements while, at the same time, will seek ways to uphold the principles set forth in this Human Rights Policy.

We endeavour to positively impact human rights and will report our contribution to the UN Sustainable Development Goals, as required.

Key Principles:

Health and Safety

The Company operates in a safe, responsible manner respecting the health of our employees, our customers, suppliers, contractors, and the communities in which we operate. The organization provides a safe and healthy workplace, complies with applicable safety and health laws, regulations and internal requirements. The Company will not compromise any health or safety requirements for profit or production.

Forced Labour, Human Trafficking and Working Time

Jamalco is compliant with all requisite local laws and international conventions including (ILO Convention 29, 105 and the 2014 Protocol) and is firmly of the understanding that people should work because they want to or need to, not because they are forced to do so. The organization denounces all forms of involuntary labour, which includes, but is not limited to modern slavery, serfdom, human trafficking, slavery, servitude, debt bondage, prohibits the use of all forms of forced labour, including prison labour, indentured labour, bonded labour or military labour or any form of sexual exploitation. Jamalco's work hours and duration comply with Jamaican laws, applicable Collective Labour Agreements or agreed Contractual Terms and Conditions.

Trusting Workplace and Equal Opportunity

In keeping with the Jamaican Constitution and the Labour Relations and Industrial Disputes Act, Jamalco seeks to provide a trusting workplace that is safe, respectful and inclusive of all individuals and that is free from harassment, bullying, offensive or disrespectful conduct. Jamalco believes that individuals must be treated fairly and equitably in all employment-

related decisions; and such decisions must be based on qualifications and job-related experiences.

Children and Young Workers

At Jamalco, our hiring practices conform to the International Labour Organization (ILO) conventions for minimum age and child labour. The Company complies with all applicable Jamaican laws and regulations relating to hiring children and does not employ children or support the use of child labour. We also encourage the development of educational, training, internships and apprenticeship programs tied to formal education for young people.

Compensation

Jamalco compensates employees competitively relative to the industry and the local labour market and is committed to paying a competitive, liveable wage. The organization's compensation philosophy is communicated to employees and the Company operates in full compliance with applicable wage, work hours, overtime, benefits laws and collective labour agreements.

Freedom of Association and Collective Bargaining

We respect our employees' right to join, to form or not to join a labour union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognized union, Jamalco is committed to establishing constructive dialogue with their freely selected representatives. The Company is committed to bargaining in good faith with such representatives and to respect and abide by all ensuing labour agreements.

Workplace Security

Jamalco is committed to maintaining a workplace that is free from violence, all types of harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. All locations are equipped with manual and electronic means of security. Security is provided for physical locations, equipment and personnel as is deemed necessary to secure and ensure employee privacy and dignity. Jamalco promotes and requires humane treatment for all employees and contractors who may interact with private and public security personnel or electronic surveillance systems utilized or engaged by the Company.

Environment

Jamalco is committed to operating in a way that respects and protects the environment wherever our locations exist. The Company will not compromise any environmental commitment for profit or production. The Company will respond truthfully and responsibly to

questions and concerns about our environmental actions and the impact of our operations on the environment and our hosting communities. In particular, we have the ambition toward Net Zero carbon emissions by 2050 in alignment with the global efforts to mitigate climate change and the protection of indigenous sites, such as areas under the protection and control of the National Heritage Trust.

Data Privacy

Jamalco takes seriously its legal and ethical obligations to protect the privacy of all its employees and to safeguard their personal information. The Company is committed to protecting the personal information of all individuals and to leverage data as an enterprise asset and mitigate risk of data breach, data losses or misuse. It is Jamalco's policy to comply fully with all applicable data privacy laws, such as the Jamaica Data Protection Act and any others to which it is subjected in the countries where the Company does business. Jamalco is committed to collect, process and transfer personal data responsibly in accordance with the principles and obligations set forth in the Jamalco Data Privacy Policy, unless it conflicts with stricter requirements of local law. The organization recognizes its legal and ethical obligations in order to maintain the confidentiality of sensitive information to which it is entrusted by employees, clients or colleagues.

Harassment and Bullying

In accordance with Jamaica's Sexual Harassment (Protection and Prevention) Act, Jamalco is committed to preventing and addressing harassment and bullying in the workplace and will investigate all reported instances regardless of the source of the complaint. The Company enforces its own Racial and Sexual Harassment Policy and holds all offenders accountable, which could result in disciplinary action up to and including termination of their contract of employment.

3.0 ETHICAL CONSIDERATIONS:

Fairness and Justice are fundamental ethical principles that guide Jamalco's employment practices. Jamalco acknowledges and is committed to the practice of treating all employees equitably regardless of their background by ensuring that all decisions and processes utilized are carried out in a manner that is impartial, transparent and respectful, to promote a fair workplace. This is evidenced in the following practices:

Recruitment Process

Jamalco's recruitment process fosters equal opportunity by utilizing a competitive selection process where each shortlisted candidate is required to undergo a panel interview. The candidate with the highest interview score is then made an offer of employment.

The organization's management reserves the right to appoint employees to middle management, executive management and senior management positions, which would bypass the competitive process.

Fair Performance Management System

Having a clearly defined system to establish and measure employees' performance is essential for the management and development of the organization's human capital. The performance management process must ensure that all employees are evaluated objectively and consistently, promote trust, while serving to motivate employees to strive for excellence. The methodology must include performance objectives to which employees and their respective supervisors must first agree, and clearly defined performance competencies on which an employee's performance will be measured at least two times in each year. Employee's self-assessment and rounded feedback are critical aspects of the performance management system.

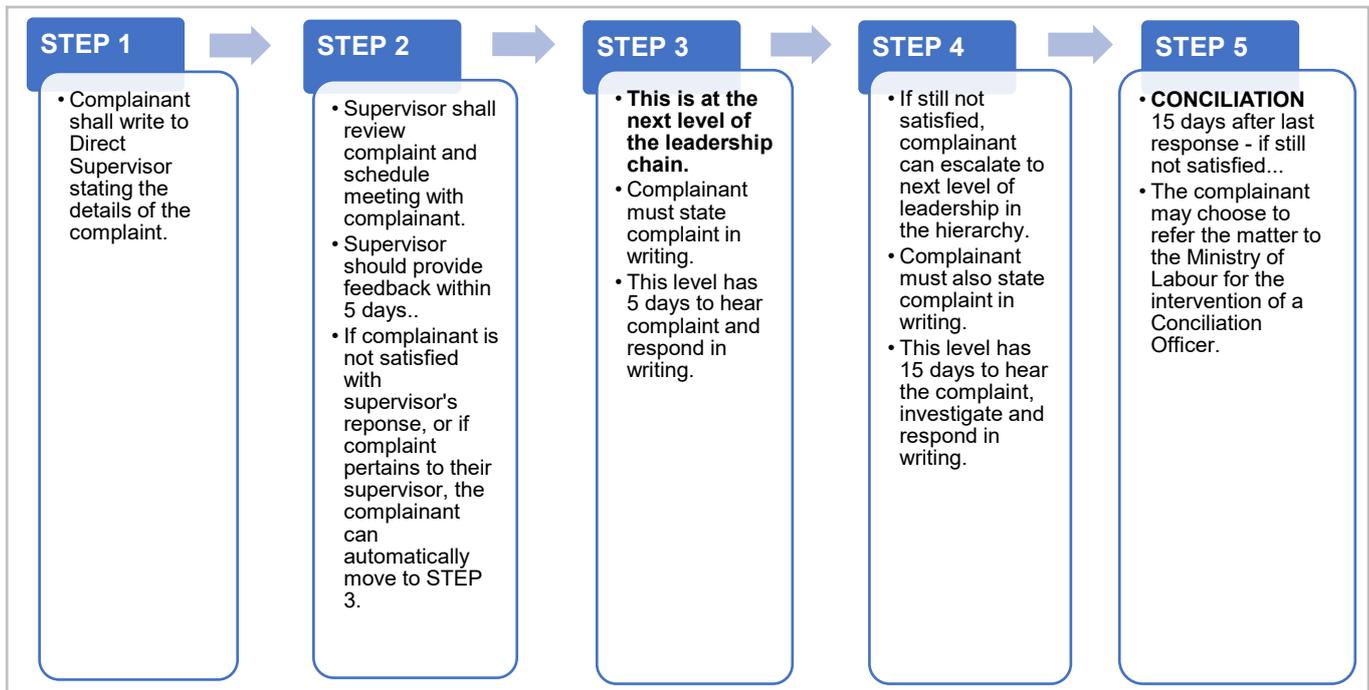
Open Communication with a Defined Employee Grievance Process

All efforts will be made to foster an environment of open and honest communication between employees and management at Jamalco. In this regard, leaders are encouraged to maintain an open-door policy, where employees may give and receive feedback in an environment of mutual respect and understanding.

Furthermore, where employees have complaints or grievances pertaining to workplace issues, they may choose to utilize the formal grievance process to raise their concerns in writing to their direct supervisor or the required hierarchical level above their supervisor.

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5-Step Workplace Grievance Process



Training and Development

The Company is committed to providing employees with opportunities to learn and grow personally and professionally. Employees are approved for training and/or development opportunities on the basis of mandatory or required training for business needs, or because specific training/developmental opportunities were selected as part of the employee’s Individual Development Plans (IDPs).

Jamalco aims to be fair in the application of this program which is open to employees at all levels of the organization. This program is managed by the Talent Management Department under clear policy guidelines.

Reward and Recognition Program

Jamalco is committed to providing a transparent program to recognize and reward employees for outstanding performance when they go above and beyond the minimum expected performance. Employees may either be selected on the basis Monthly Recognition program, for which there is a detailed criteria, or for an Instant Recognition which is based on significant work delivered on a particular job task or project. The Reward and Recognition Program is managed by the Talent Management Department under clear policy guidelines.

Integrity

In keeping with the organization's foremost value which is Integrity - "We are honest, transparent and trustworthy", Jamalco is committed to always acting with honesty and integrity in all employment-related actions and decisions.

Respect

Showing due regard for each person and recognizing the dignity of each individual is fundamental to an ethical workplace. The leadership of the Jamalco organization is committed to this practice and holds all its employees accountable to this standard of conduct in all interactions with fellow colleagues, contractors, customers and members of the community.

Transparency

Jamalco recognises that being open and transparent in communication and decision-making fosters trust among stakeholders including employees, contractors, partners and the community, and endeavours to always operate in this manner, being mindful of the role that transparency plays in building a positive work culture and environment.

Diversity and Inclusion

The Company seeks to provide a trusting workplace that is safe, respectful and inclusive of all individuals and reflect the diversity of the communities in which we operate. Building a talented and diverse workforce strengthens the organization and its competitive advantage. Each of us plays an important role in creating an open and inclusive workplace where every individual is able to freely contribute to Jamalco's success. We embrace our colleagues' varied backgrounds, cultures and perspectives and value our differences.

Employee Well-being

i. Medical Department

- a. In furtherance of the organization's mandate to maintain a safe and healthy work environment, Jamalco provides medical services to its employees through a full-service Medical department that is equipped with a registered Medical Doctor who visits the clinic on a weekly schedule and remains on call and a team of nurses who operates on a 24-hour basis at the refinery and in the mining operations.

ii. Employees' Assistance Program (EAP)

- a. The organization prides itself in offering a confidential, support service to employees who may be struggling with personal challenges. The EAP services may also extend to employees' family members, in certain cases. The EAP is staffed with a full-time counsellor and may be supported by a part-time counsellor, if the need arises.

iii. Employees' Sports Club

- a. After working hard, employees need a place to unwind and recharge. The organization offers a recreational centre which is equipped with a football field, cricket pitch, walking trail, tennis court, multi-purpose court, a small gymnasium and a sports bar where employees may participate through membership.
- b. The Sports Club also features prominently in the organization's employee engagement efforts, as inter-department sporting competitions are organized and facilitated by the Sports Club Coordinator.
- c. The Sports Club also supports the Medical Department's strategic efforts towards increasing employees' wellness through the reduction of life-style conditions.

Corporate Social Responsibility (CSR)

Being mindful of the need to be a good corporate citizen, Jamalco fosters a culture that embraces CSR principles by encouraging employees to become involved in volunteerism and other initiatives that support the organization's CSR and community sustainability agendas.

REVISION INDEX

Revision Date	Nature of Revision	Document Review Participants
April 2025	New Document	J. Anson/C. Buckmaster
March 2026	Section on Forced Labour, Human Trafficking and Working Time was updated.	J. Anson, C. Buckmaster