



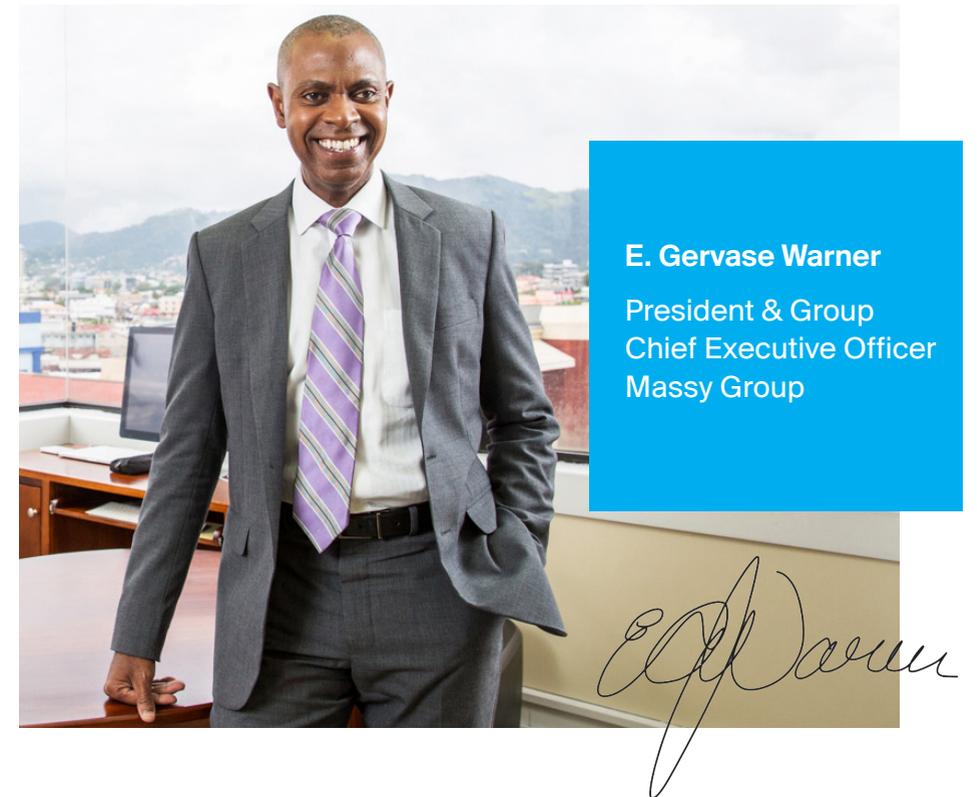
Speak Up Policy

Our Commitment

The Massy Group is proud of our **reputation as a values-driven business**, and we take seriously our responsibility to protect this heritage. We believe that integrity is a competitive advantage and we are committed to observing and ensuring the **highest ethical standards** in all our business activities and to **conducting business with honesty, integrity, and respect for the law and our values**. In keeping with this commitment, we have had a Whistleblower Policy in effect since 2011, this policy has been updated and our systems enhanced, and it is now referred to as the **Speak Up Policy**. The policy follows from our **Code of Ethics & Conduct** and conveys Massy's commitment to responsible practice wherever we operate. It provides guidance and support to individuals at all levels for making decisions and carrying out their work in ways that are compatible with our Massy values. The Speak Up Policy provides a mechanism for employees to raise serious concerns that they may have where they believe such concerns cannot be raised through existing management channels.

If you observe or suspect any misconduct, you are encouraged to Speak Up.

The Massy Group is committed to leading the way for positive change in our region, and we believe that by operating with integrity, accountability, and transparency we will have a positive impact on our people, our customers, and the communities in which we operate.



E. Gervase Warner
President & Group
Chief Executive Officer
Massy Group

The Business Integrity Perspective

“The time is always right to do what is right” said Martin Luther King.

The Massy Code of Ethics & Conduct (our Code) outlines our commitment to doing the right thing, following not just the letter, but the spirit, of the law. If we follow our Code, we can meet both our business goals and our high standards of integrity. Each of us is accountable and each of us has a responsibility to always make the best decision for Massy. Remember that what may not be specifically illegal can in some cases be unethical and therefore not in keeping with our Code.

We want you to feel empowered, to ask questions, to challenge, and, to voice your concerns. That is why we created the Speak Up Policy (**Speak Up!**).

The Speak Up Hotline is an independent hotline available in both English and Spanish; it provides anonymity and confidentiality.

Anyone, any employee, customer, vendor, supplier, shareholder, director, any person, who has a concern about possible misconduct within the Massy Group can use **Speak Up!**



Angélique Parisot-Potter

Executive Vice
President, Business
Integrity & Group
General Counsel
Massy Group

Speak Up Policy

Do you have a concern?

“ I saw my colleague being bullied but she is afraid to come forward ”

“ My boss asked me out to dinner, I said no, and now I feel harassed ”

“ I am worried this gift is too expensive ”

“ I suspect abuse of company resources ”

“ Is this fraud? If I make a report will I lose my job? ”

“ I think someone is paying bribes ”



Talk

to the person involved, your Manager, HR, Finance, Audit, Legal, or any Executive (if you suspect fraud report it to Group Finance or Internal Audit at internalaudit@massygroup.com)



Report

Go to <https://report.whistleb.com/massy> to file a report
OR Send an email to speakup@massygroup.com
OR Call the Speak Up Line and enter this unique
IVR code: 5773#

The online Speak Up service and Speak Up line are managed by an external and independent party. Your report is **confidential and anonymous** when you use either of these two options. Your report is always confidential and all reports will be dealt with appropriately.

You will be protected against retaliation or victimisation.
You will not lose your job for reporting concerns in good faith even if you are mistaken.

We know it is difficult to raise concerns, but we encourage you to come forward and **Speak Up!**



IVR code: 5773#

Barbados (EN)
1 800 203 0915

Colombia (ES)
571 508 7320

Jamaica (EN)
1 876 630 2004

Trinidad & Tobago (EN)
1 868 224 5705

Speak Up Policy



Why should we Speak up?

Massy is committed to conducting business with integrity, in accordance with our values and the law, but sometimes you may observe misconduct or suspected wrongdoing – **if you do see something that looks wrong, we encourage you to Speak Up.**

We value the help of employees who identify and Speak Up about potential concerns and you have a vital role in our success, as, it is often only through Speaking Up that misconduct comes to light which can be addressed before real damage is done. We can deal with issues fairly and transparently whereas, if you remain silent about possible misconduct the situation may become worse.

You will **not be penalised for reporting concerns even where your belief or suspicion turns out to be false** and we do not tolerate retaliation or victimisation of any kind against anyone who raises a concern. **You do not have to prove your suspicions, but you are expected to act in good faith** - this policy explains how you can raise concerns in confidence and without fear of retaliation and what you can expect when you **Speak Up.**



Who is this Policy applicable to?

This Policy is available to **everyone in the Group** - our employees, directors, contractors, partners, suppliers, customers, agents, distributors, representatives and shareholders - anyone, who wishes to raise a concern about possible misconduct within our Company.



What concerns can I raise?

These are just some examples of concerns you can Speak Up about:

Unlawful or illegal conduct including, but not limited to: bribery, corruption, fraud, embezzlement, theft, insider trading.

Unethical conduct including, but not limited to: discrimination, harassment, bullying, abuse of authority, conflicts of interest, misuse of corporate information, breach of confidentiality, disclosure of confidential information, inadequate financial/non-financial record keeping/financial malpractice.

Abusive or wasteful conduct including, but not limited to: misuse, abuse or waste of company resources, property or services; abuse/misuse of financial and/or human resources, either through negligence or malicious intent, dangers to health, safety, security and the environment.

Speak Up Policy

What is 'Speaking Up' and how is it different from reporting a grievance or complaint?

Speaking Up is the act of disclosing information about wrongdoing in the workplace. Our Speak Up policy allows you and anyone within or outside Massy to raise concerns about any suspected misconduct, unethical behaviour, possible unlawful activities, failure to comply with legal obligations and malpractice (for example, harassment, crimes, financial impropriety, dangers to health and safety or the environment), and the covering up of any of these, through a variety of channels.

On the other hand, if you are making a complaint, you are saying that you have personally been poorly treated. **A grievance is when an employee has a dispute about their own employment position** (for example, if you have not been paid on time, or if you are demoted unfairly, or given an unreasonable workload). The HR grievance procedure at your company should be used to report and address these complaints and grievances. **The Speak Up hotline should not be used to report complaints or grievances.**

Note that while we hope that you will use Speak Up to report all suspected workplace wrongdoing so we can address any issues before it is too late, **it is mandatory to report all suspected fraud to the anti-fraud team at internalaudit@massygroup.com.** You can also use Speak Up to report suspected fraud.

How does it Work?



How to raise a concern and Speak Up

Any employee may confidentially raise a concern as follows:

- To your Manager, HR, Audit, Finance, Legal or any Executive OR
- Via email to speakup@massygroup.com OR
- Online at <https://report.whistleb.com/massy> OR
- Via phone – for your country

All reports raised via any of the above channels are confidential.



Speak Up online and phone reports are **confidential and anonymous** and may be made in **English** or in **Spanish**. These are managed by an independent and external provider and phone reports are monitored by an interactive voice response system.

The system is available 24/7, 365 days a year.



How we will respond

After you complete your report (online or by phone), you will receive a unique **ID** and **PASSWORD** which you can use to call back or access the **Speak Up site** (<https://report.whistleb.com/massy>) to check progress on your report.

You can check for feedback or see if there are further questions and, if you want, provide additional information. If you choose to remain anonymous note your **ID** and **PASSWORD** as this is the only way to contact you. All Speak Up reports are directed back to Massy for review and /or investigation.



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Our Promise to You



Confidentiality

All reports will be treated in confidence and your identity (if you choose to disclose) will be kept **confidential** and will not be disclosed. As a matter of principle, we must inform an implicated person that a matter has been raised about him/her. **You can help us keep confidentiality by being discreet and not discussing your report with anyone else.**



Anonymous Reports

We have established an online service independently managed where you can make **anonymous reports**. At first instance, we would like to encourage you to speak to your manager or trusted colleague, but we understand that there are instances when this is not possible, so you can **share your concerns anonymously** via this online service at <https://report.whistleb.com/massy>



Protection

We know employees may fear their jobs could be jeopardised if they raise a concern. Be confident and know you will not suffer. **Threats and retaliation are not tolerated** and anyone acting inappropriately will face disciplinary action.

You are protected even if you are incorrect or mistaken. If you believe you are being subjected to retaliation by any person in the Group because you raised a concern, **please advise us immediately at speakup@massygroup.com** and appropriate **action will be taken to protect you.**

Misuse of this Policy and Untrue Disclosures

An employee who raises malicious concerns in bad faith, or a concern the employee knows to be false could be subject to disciplinary measures.

This includes knowingly making a false or reckless accusation, lying to investigators, interfering with an investigation or refusing to cooperate in an investigation.

What Happens after the Report is Submitted?

“ How soon will I hear back from you? ”

If you submit a report online, using your unique ID and PASSWORD you will be able to check in on your concern online and you will receive confirmation and/or an **initial response within 10 working days**. If it is impossible for the initial review to be completed within ten working days, or where urgent action is required, this will be explained in the confirmation.

“ How long will it take? ”

On average, closure of the matter can be expected within **1 to 3 months** depending on the nature of the allegation.

“ What will you tell me? ”

As far as possible, the individual who lodges the report **will be informed of the overall findings**, i.e., whether or not our Company has established that misconduct has taken place. Please note that **we will not be able to give you full details** of the outcome of a case (or related actions taken) for reasons of confidentiality, privacy and the legal rights of all concerned.



The Speak Up Review Panel

Serious issues will be shared confidentially, with the President & Group CEO, and depending on the nature of the report and the requirements for review and or investigation, with others as appropriate, collectively the Speak Up Review Panel, to determine appropriate action to be taken for each Speak Up. Currently the Speak Up Panel comprises the three heads of People & Culture, Internal Audit and Legal, as well as, a member of the independent third-party provider.

We take every report of possible misconduct seriously and we will respond to your concerns but please remember that reviewing and testing the concerns is not an indication that we have either accepted or rejected these concerns. All concerns received are logged into a case management system and depending on the nature, urgency and potential impact of your concern, the case will be handled by a case manager appointed by the Speak Up Review Panel and who will work under the supervision and instruction of the Speak Up Review Panel.

What Happens after the Report is Submitted?



Review and investigation

The first stage of the review process is an **assessment** of the concern to decide if it requires further review and investigation (and, if so, by whom). The Speak Up Review Panel will meet to discuss reports received to make this initial assessment and decide if there are grounds for proceeding with an investigation. The Panel will also exclude from its meetings any persons it deems appropriate, depending on the nature of the report and the allegations made.

If the Panel decides there are insufficient grounds on which to proceed, the individual making the report will be informed and will have the right to provide further information and/or resubmit his or her concerns.

If further review and investigation is required the Panel will decide how this should be undertaken and will have the responsibility to conduct investigations which will focus on an objective, factual and unbiased analysis of the case. As needed, internal or external experts (e.g. lawyers or accountants) may be engaged to assist and they will work under strict confidentiality. **Possible outcomes could include:**

- 1 internal investigation by qualified, independent senior member of the Company;**
- 2 referring the matter to the police;**
- 3 an independent external inquiry.**

For reporters and non-reporters

Please note you may be approached for additional information, through the online service if you are an anonymous reporter, or because you may have some information in connection with the report or because you have been implicated in a report. If you become involved in an investigation, **you must cooperate and answer all questions completely and honestly.** Being untruthful or withholding relevant information from those conducting the investigation as well as delaying, interfering with or refusing to cooperate with an investigation may lead to disciplinary measures. **All parties involved, including any implicated persons, are entitled to confidentiality to avoid unnecessary damage to their reputation.**

Whether or not you are the reporter, the implicated person or a witness, if you participate in or learn about an investigation, **you must keep the matter confidential.**

What Happens after the Report is Submitted?



For reporters and those implicated

If your concern is well-founded (i.e. misconduct has indeed taken place), appropriate measures will be taken where necessary and in accordance with the law and our disciplinary processes.

All reviews/investigations will be **conducted independently, fairly and in an unbiased manner** with respect to all parties involved in accordance with relevant laws and principles, including ensuring fair hearing. Investigations will **consider concepts of natural justice and the need to safeguard individual reputations**.

When an allegation concerns a named individual, the **person concerned will be informed of the allegation and of the evidence supporting it** as soon as possible after the report is made and as warranted by any review and or investigation.

The person about whom the report has been written **will be invited to respond to the allegation** as part of the investigation and/or before any conclusion is reached. The point at which it is appropriate for the individual to be informed will depend on the nature of the case.

Details of the case, your identity and the identity of anyone else mentioned in the report, are kept confidential throughout and after the investigation and are only shared on a need-to-know basis and if you are the one making a report you are required to cooperate with any investigation that results as appropriate but not to attempt to conduct any investigation yourself.

The findings of any investigation will be reported to the Speak Up Review Panel who will reach a decision on further action to be taken. Following an initial investigation, other internal procedures may be identified as relevant and may be invoked, such as the disciplinary, grievance or complaints procedures.

A report summarising all disclosures and inquiries and any subsequent actions taken will be made by the Panel and submitted to the Governance, Nomination & Remuneration Committee (GNRC) on a quarterly basis.

What Happens after the Report is Submitted?

“ What if I do not agree with the decision ? ”

If you believe that your concern or a concern raised against you has not been handled appropriately or that an investigation has not been performed correctly, please inform the Chairman of the Governance, Nomination & Remuneration Committee at chairgnrc@massygroup.com or visit at [63 Park Street, Port of Spain, Trinidad.](#)

Please clearly state the reasons for your dissatisfaction and why you think it has been handled inappropriately.

Ways to report your concerns

- **Talk** to your Manager, HR, Audit, Finance, Legal or any Executive
OR
- **Send an email** to speakup@massygroup.com
OR
- **File a report** online at <https://report.whistleb.com/massy>
OR
- **Call** the Speak Up Line for your country and enter this unique IVR code: [5773#](#)



Speak Up!



Talk

face to face to a Manager, trusted colleague,
HR, Audit, Finance, Legal or an Executive



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to speakup@massygroup.com



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