

# Whistle Blowing Policy

This policy applies to all employees, across all business lines in the company.

The policy governs procedures that must be followed when allegations of impropriety are made by a whistleblower and such allegations: (i) regardless of scope, accounting, internal accounting controls, or auditing matters, or (ii) regardless of the scope of liability, could cause serious damage to the JSGCL's brand or reputation or, (iii) could result in a material liability to the JSGCL.

Allegations of impropriety outside the scope of this policy should be reviewed with CEO by the HR to determine an appropriate course of action.

## Purpose of this Policy

This policy establishes guidelines and procedures for handling whistleblower claims. Consistent with the JSGCL's commitment to maintain the highest standards of integrity, compliance with the law and its Code of Conduct is a responsibility that everyone in the JSGCL must assume. By appropriately responding to allegations by employees, suppliers, customers or contractors that the company is not meeting its legal obligations, the company can better support an environment where compliance is the norm and thereby avoid a diminution in shareholder value.

## Key Definitions

A whistleblower is an individual who brings to the attention of company management an allegation of impropriety within the JSGCL that has not been resolved to the satisfaction of the individual and that prevents the company from meeting its legal obligations or from complying with generally accepted accounting principles.

## Summary of Policy Requirements

It is JSGCL policy to closely scrutinize and appropriately respond to allegations by employees, suppliers, customers or contractors that the company is not meeting its legal or ethical obligations or complying with generally accepted accounting principles when such allegations: (i) regardless of scope, accounting, internal accounting controls, or auditing matters, or (ii) could result in a material liability to the JSGCL or, (iii) regardless of the scope of liability, could cause serious damage to the JSGCL's brand or reputation.

## Detailed Policy Requirements

### Allegations that may form Whistleblower Claims

The following is an indicative list of the types of allegations that form whistleblower claims that fall within the scope of this policy. This list is not intended to be exhaustive.

- Internal business practices that are inconsistent with generally accepted accounting principles.
- Falsification, alteration or substitution of JSGCL records
- Violations of JSGCL's Code of Conduct including:
  - ✓ Conflicts of interest
  - ✓ Inaccuracy of books and records
  - ✓ Insider trading
  - ✓ Collusion with competitors
  - ✓ Money Laundering

- Failure to comply with the various compliance programs of the JSGCL.
- Authorizing, directing or participating in serious breaches of JSGCL policy.
- Deliberately failing to report serious breaches of policy, concealing such breaches, or deliberately withholding relevant information concerning a serious breach.

### **Managers Responsibilities**

Managers at all levels are responsible for continually emphasizing integrity as a standard of performance for all employees.

### **Employee Responsibilities**

Employees suspecting serious breaches of policy or the law must report them immediately to their supervisors. If it is impractical or inappropriate for the employee to notify their immediate supervisor or next senior, the employee may contact the HR Department.

Employees, who have reason to believe that a serious breach of policy or law has occurred, must retain all documents that could be relevant to an investigation of the matter.

### **Investigating Whistleblower Claims**

HR will receive information from an employee on a confidential and anonymous basis, will inform the appropriate internal channels of the issue without identifying the source, except in those limited instances when the Compliance has a legal duty to inform. In those instances when information needs to be disclosed, such disclosure will only be to those who have a need to know and only to the extent necessary.

HR, as appropriate, will be responsible for directing all aspects of any investigation with the consent of CEO. This direction may include the assignment of an auditor, to make a thorough examination. In limited situations, outside counsel, outside auditors or others may be engaged to conduct the investigation.

Employees should not be interrogated, terminated, disciplined or otherwise advised of investigations until management is instructed to do so.

In conducting an investigation, precautions should be taken to safeguard against unfounded, inaccurate or unwarranted accusations. An investigation should be conducted including interviewing the employee or contractor making the allegations.

The Management will make every effort to cooperate with law enforcement authorities. Law enforcement authorities should not be contacted in whistleblower situations until instructions have been received. An exception would be in the rare instance where, for example, a theft or similar crime is discovered in the process of being committed and authorities have to be contacted to prevent the crime from being perpetrated.

### **Disciplinary Measures**

Once investigated, a decision on what course of action to take based on the findings of the investigation must be approved by the HR and CEO. The heads of these two functions will apprise the Board of Directors as appropriate.

Disciplinary measures will depend on the circumstances of the violation and will be applied in consultation with HR and the CEO. Consideration will be given to whether or not a violation is intentional, as well as to the level of good faith shown by an employee in reporting the violation or in cooperating with any resulting investigation or corrective measures.

**Retaliation against Whistleblowers**

No adverse employment action, e.g., termination, counseling, lower rating, etc., may be taken against a whistleblower employee solely in retaliation for reporting allegations of impropriety that fall within the scope of this policy and which the employee reasonably believes to be true.