



JPS | Powering What Matters

JPS CODE OF ETHICS & BUSINESS CONDUCT

INTEGRITY IS AT THE CORE OF WHO WE ARE



A MESSAGE FROM OUR COMPLIANCE OFFICER



At JPS, integrity is one of our core values and we operate with zero tolerance for fraud and corruption and this applies to all employees as well as vendors and contractors. As stewards of JPS, each of us is expected to be on the lookout for fraudulent activity and make good faith reports of actual or suspected breaches of ethics using the relevant channels.

The Code reminds us to demonstrate tolerance and good professional conduct towards each other irrespective of our differences in race, gender, socioeconomic background, physical ability, marital status, religion or beliefs.

We all have our unique roles to play and the advancement of the Company's goals would not be possible without the involvement of each and every one of us. Let us continue to be kind and treat each other with the utmost respect and professionalism.

Melanie Gilchrist

Compliance Officer

SVP Legal, General Counsel & Compliance Division



Table of Contents

Message from our Compliance Officer **2**

Why we need a Code of Ethics & Business Conduct **5**

The JPS Compliance Program **6**

The JPS Compliance Program 7

Our Ethical Commitments **7**

Obligations at Every Level **7**

JPS Core Values **9**

Compliance with The Code **10**

Violating The Code **10**

Making Amendments to The Code **10**

Making the Ethical Decision **11**

Why it is important to Report Wrongdoing **12**

Duty to Report **13**

Protection from Retaliation **13**

Complaints against JPS Employees **14**

The Ethics Office **15**

INTEGRITY WHEN WORKING WITH EACH OTHER 18

Respect and Tolerance **19**

Diversity **19**

Harassment **19**

Family and Personal Relationships **20**

Outside of Working Hours **21**

Outside Employment, External Activities and Board Positions **21**

Violence in the Workplace **22**

Alcohol and Drugs in the Workplace **22**

Child and Forced Labour **23**

Health, Safety & Security **24**

Conflicts of Interest **26**

Post Employment **26**

Disclose, Disclose, Disclose **28**

INTEGRITY IN WORKING WITH OUR BUSINESS PARTNERS 30

Zero Tolerance for Corruption **31**

Bribery and Corruption **31**

Gifts, Awards and Payments **32**

Working with Third Parties **33**

Local & International Laws **34**

Fair Competition **34**

INTEGRITY WITHIN OUR COMMUNITIES 36

Protecting the Environment **37**

Protecting Company Resources **37**

Protecting Physical Assets **37**

JPS Finances **38**

Time – Yours and Others **38**

The JPS Brand **39**

Responsible Marketing **39**

Systems, Technology & Devices **40**

Digital Media, Publications and Public Speaking **41**

Sensitive Information **42**

INTEGRITY WITH OUR GOVERNMENTS & REGULATORS 44

Independence and Impartiality **45**

Political Activity **45**

Interacting with Public Officials **45**

Accurate Reporting and Records **46**

FAQs 49

Glossary 53

Policies Referenced in The Code 54

Why We Need a Code of Ethics & Business Conduct

Our Code of Ethics & Business Conduct (the “Code”) is part of JPS’ Compliance Program, and consolidates JPS’ lawful and ethical expectations of its employees and officers. The Code covers the policies and guidelines that influence how we should interact with each other, our partners, regulators, contractors and the public in order to uphold ethical principles and protect JPS’ reputation as a trustworthy organization.

The Code applies to all JPS employees, consultants, contractors, volunteers, interns, members of the Board of Directors and members of Committees of the Board of Directors, and they are collectively referred to in this Code as “employees”, “you”, “we” or “the Organization”.

The Code does not replace or supersede the various policies, rules, regulations, bulletins and procedures that provide greater detail on specific subjects. All employees must abide by the essence and intent of this Code and its accompanying policies.

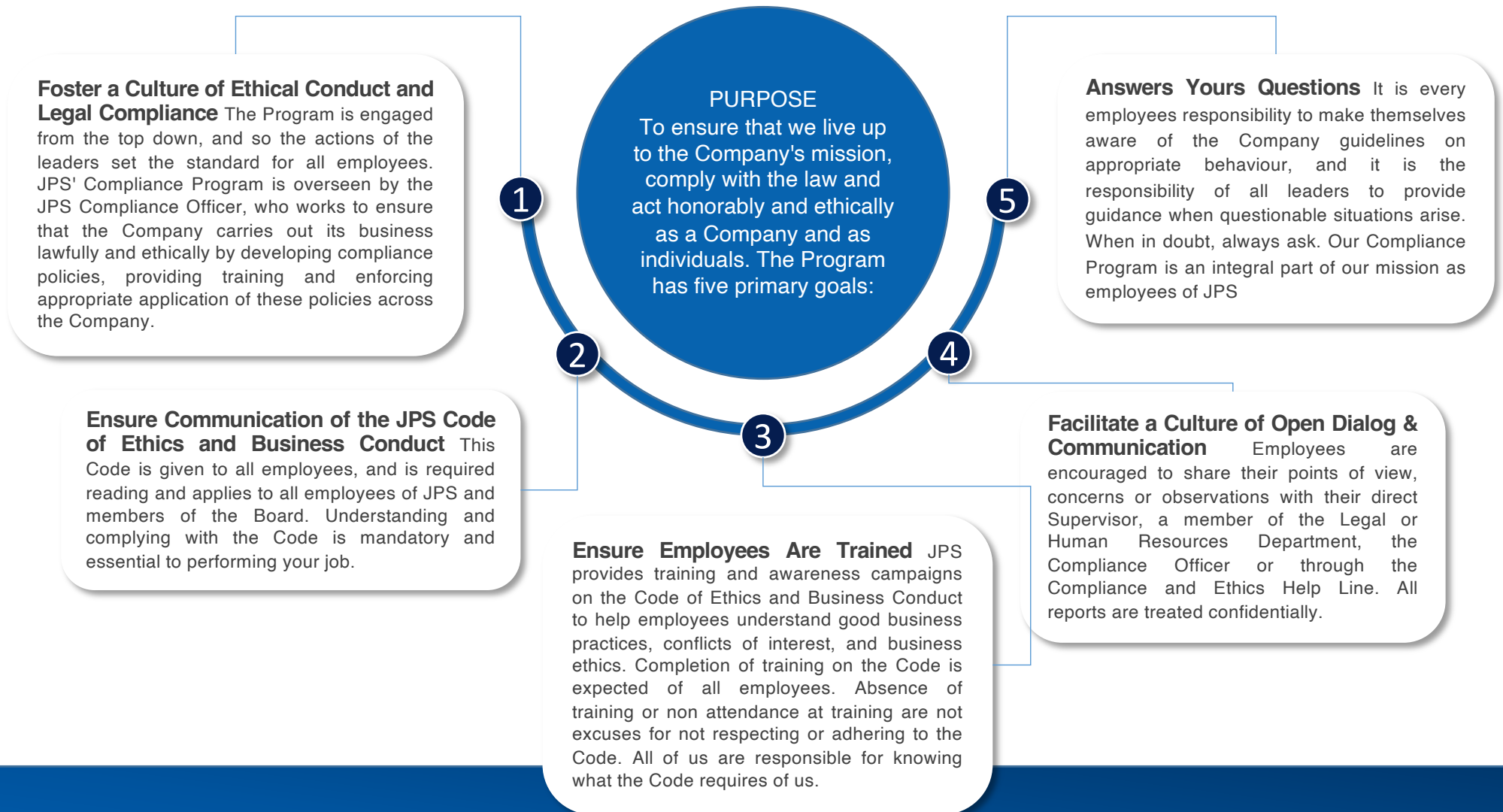
A guide to help resolve ethical issues

A declaration of our commitment to the highest standards of integrity

Our dedication to honesty, integrity, transparency, accountability and mutual respect remain constant

Promotes, strengthens and supports an ethical culture throughout JPS

THE JPS COMPLIANCE PROGRAM



Our Ethical Commitments

Doing the right thing is not always easy, but having integrity as a core value means we are expected to operate from a place of honesty and consistency in our words and actions. We are all expected to know and follow the rules, policies and standards that apply to our business as well as the laws of Jamaica – ignorance is no excuse. If you are unsure of what to do, or whether a particular rule or policy applies to you, speak to your direct Supervisor, the Compliance Officer, a Human Resources Director or a member of the Legal Department. We are each responsible for our own behaviour; when you are asked to do something that violates a rule or policy, you are obligated to refuse to do so and thereafter you can make the necessary report to the Compliance Officer through the various channels provided.

Obligations at Every Level

We are all bound by the same ethical standards as set forth in the Code for all employees. Leaders, in particular, have an obligation to embody and promote those standards to their teams and colleagues, embracing and role modelling our Core Values and setting the “tone from the top”. As such, they are critical to embedding ethical behaviour across the organization. Employees in leadership roles are expected to provide advice and guidance, support good conduct and foster a culture where employees feel free to raise concerns, ask questions and make suggestions without fear of reprisal or retaliation. Leaders are to be diligent not to delegate discretionary authority to individuals who exhibit questionable judgement or do not actively demonstrate our Core Values.

Employees at all levels are to embody ethical behaviour; we are all responsible for our own actions, but we are also responsible for influencing the behaviour of our teams and coworkers. Set the appropriate ethical tone in your workplace and expect no less of others.



**“ does my
decision
reflect
our
values? ”**

JPS has adopted a set of values, behaviours and capabilities that enable the organization to be more adaptive, creative, resilient and much faster when dealing with the complexity, uncertainty and change of the energy world, leading to improved well-being and better outcomes.

Core Values



ACCOUNTABILITY Accepts personal responsibility and/or holds others responsible for agreed outcomes



SAFETY Demonstrates personal commitment to safety.



PASSION Demonstrates drive and zeal for the mission at hand (individual, team and organization).



INTEGRITY Consistent in our communication, actions, values, methods, measures and principles



RESPECT Treats ideas, opinions and feelings of others with respect



EXCELLENCE Committed to meeting goals/deadlines with quality output and solves problems with urgency and efficiency.

Expected Behaviours & Capabilities

I

We try new ways and “fail fast”, using every opportunity to learn and succeed

M

We never settle — in everything we do, we challenge our ideas of what’s possible in order to better meet the needs of our customers and achieve our goals

P

We work with conviction and urgency to solve problems and vigor to improve the way we work

A

We anticipate and nimbly respond to changes and take advantage of every opportunity

C

We are committed to delivering results by working together on shared goals and visions

T

We pride ourselves on providing complete visibility into the successes, and sometimes failures, of our business

Compliance with The Code

All employees are required to complete the Annual Code of Ethics Questionnaire, as updated or amended from time to time by the Company. If you report a breach of the Code or are being investigated, you must cooperate fully with any investigation, but should not conduct your own independent investigation, as you may risk compromising the integrity of a formal investigation. Failure to complete the Annual Questionnaire constitutes a breach of the Code of Ethics and will result in action in accordance with the JPS Employee Discipline Policy.

Violating The Code

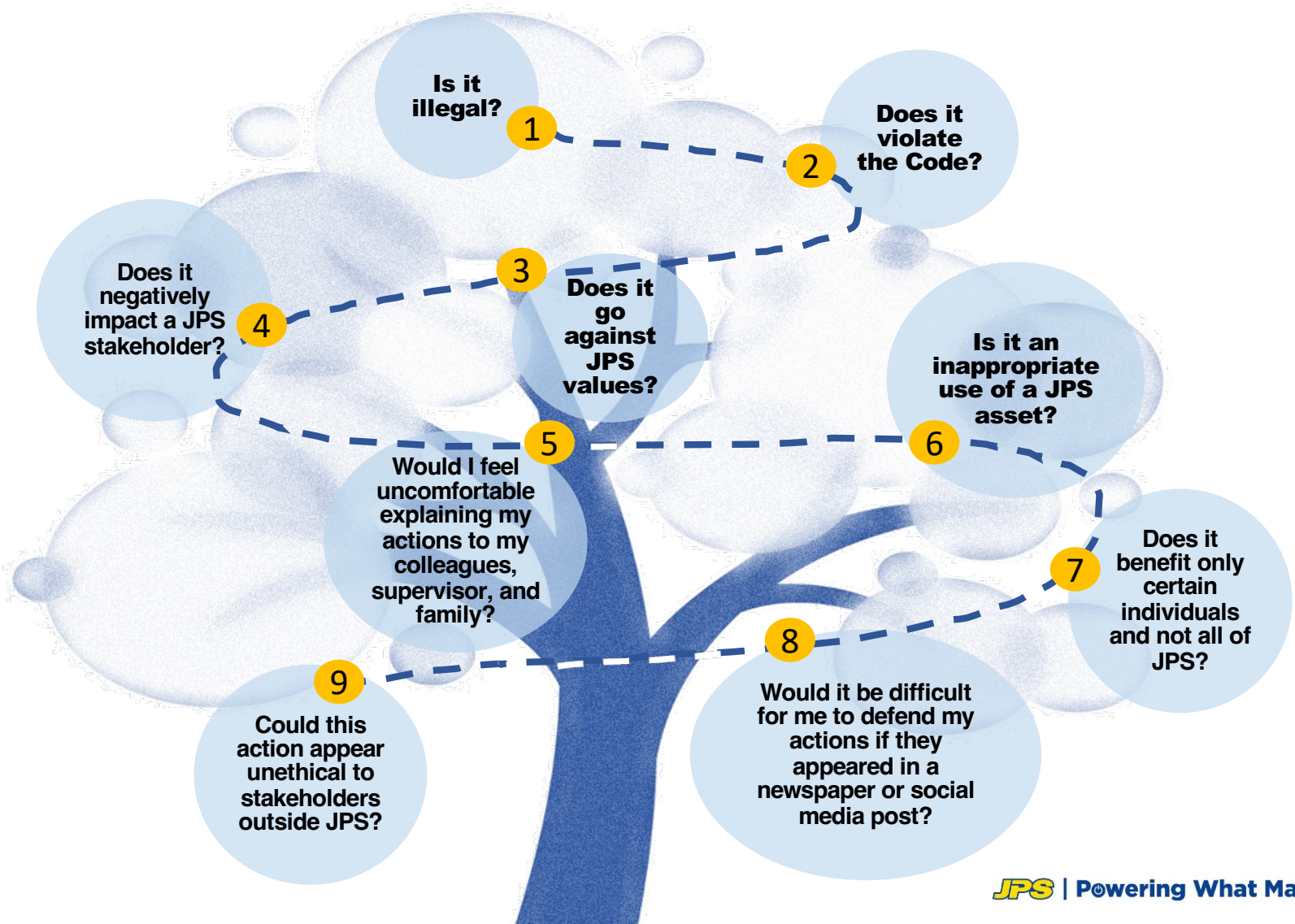
Violation of the Code will result in investigation and disciplinary action in accordance with the JPS Employee Discipline Policy. Violations may also result in civil or criminal prosecution under the provisions of the applicable law. JPS will aggressively pursue all civil and criminal avenues against offending employees.

Making Amendments and Waivers to The Code

JPS may amend this Code and reserves the right to do so at any time without advance notice. We will attempt to notify employees of any such changes. It is nevertheless the duty of all employees to keep abreast of all policies and procedures including changes to same which govern and impact how they execute their functions. All approved JPS policies are made available electronically on the company intranet. Amendments to JPS policies are neither standard nor taken lightly. Waivers of the Code are neither standard nor taken lightly and will be granted only in exceptional circumstances where justifiable.

Making the Ethical Decision

We are constantly making decisions that require discretion and judgement. There may be times when you are unsure whether the rules apply or you are faced with unique situation. This decision tree can help you handle difficult decisions. If the answer to any of these questions is “Yes” then ask for help.



Why it is important to Report Wrongdoing

If you see something, say something! Leaders must maintain an open door, speak up culture, where employees can approach them with concerns of any sort, without fear that they will be punished for doing so. This includes any concerns or observations of other leaders breaching the Code.

What to Watch Out For

If you see or suspect or if you receive credible information from someone else that leads you to believe that a JPS employee, board member, contractor or other stakeholder is acting or has acted improperly, or is involved in improper activity such as discrimination, harassment, fraud or corruption etc., you have an obligation to report the suspected misconduct without fear of reprisal or retribution.

Guidance for Leaders:

- ◆ Maintain an open door policy and thank the employee for coming forward and listen carefully
- ◆ Ask for clarification and additional information to ensure that you fully understand the concern
- ◆ Answer any questions that you can, but reach out to the Compliance Officer before responding if you are not clear
- ◆ Point out to employee that the information may need to be shared with the Compliance Officer or People Operations
- ◆ Answer any questions that you can, but seek help if you are not clear before responding
- ◆ Follow up with the employee as soon as possible if you do not have an immediate response
- ◆ Report any possible violation to the Compliance Officer or People Operations so it may be investigated

Duty to Report

Bring your observations and/or concerns to your direct Supervisor, the Compliance Officer, a Human Resources Director or a member of the Legal Department.

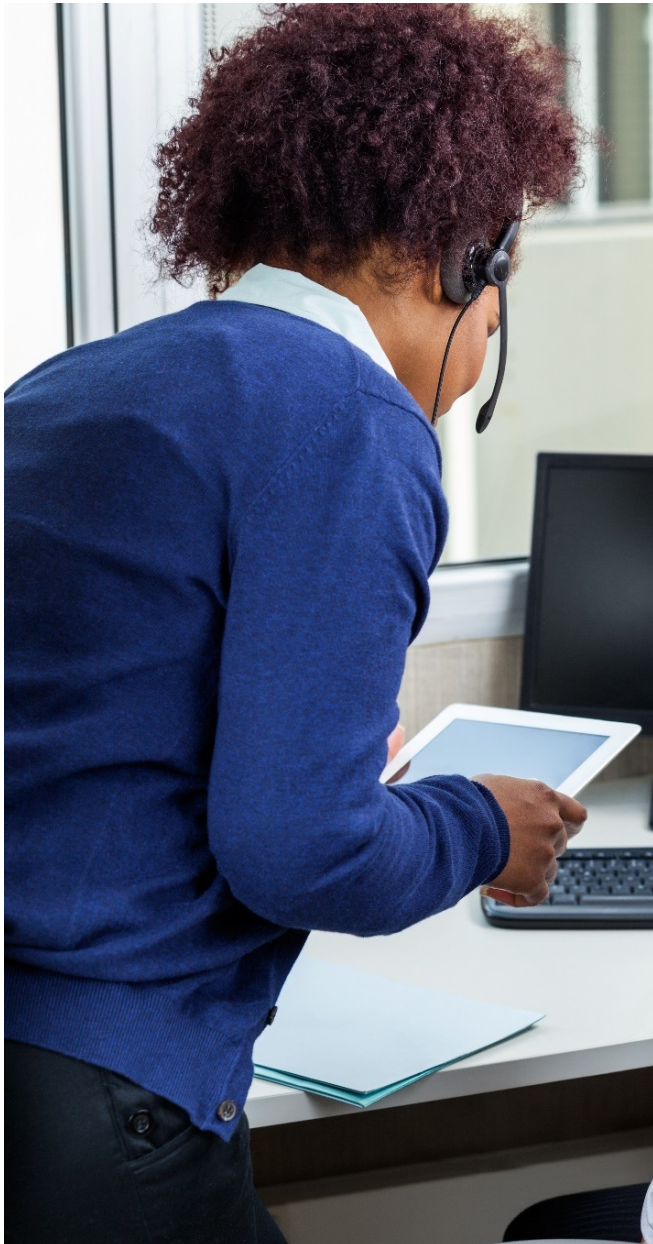
If for any reason you are uncomfortable speaking directly with a JPS employee, you are encouraged to call the 'Compliance and Ethics Help Line.' All calls, reports and any subsequent investigation will be handled confidentially; however, during the investigation process total anonymity cannot be guaranteed.

Protection from Retaliation

JPS actively promotes “whistleblowing” which means we encourage you to come forward, speak up and speak out and raise good faith concerns of possible misconduct, fraud, corruption, harassment, abuse of authority, discrimination or other wrong doing.

We support an open environment where such good faith reporting is viewed as a positive action because you are protecting the best interests of the organization. Any report made can be done without fear of reprisal or retaliation – no employee will be punished for reporting in good faith violations of law or ethical behaviour. Leaders are expected to support this transparent culture where team members feel comfortable sharing their.

If you believe that you have been subject to retaliation or threat of retaliation because you reported misconduct or cooperated with an audit or investigation, contact the Compliance Officer for advice and guidance.



Complaints against JPS Employees

It is important that the public has complete confidence in the integrity of JPS and its employees. In order to ensure this confidence is maintained, complaints against the Company, and/or individual employees, must be investigated promptly and objectively by the Compliance Officer and the People Operations Senior Division.

All JPS employees must comply with the laws of Jamaica. If you commit offences involving, but not exclusive to, prohibited drugs, fraud, seeking or accepting bribes, illegal importation or exportation of goods, you will be subject to disciplinary action and/or associated penalties applied as a result of criminal proceedings. JP's response to reports of possible violations of law may involve disclosure to and cooperation with the appropriate authorities.

All employees are required to inform their Direct Supervisor and the Compliance Officer as soon as they learn that they are the subject of criminal or possible criminal proceedings. On receipt of such information, senior management should decide whether the official can be retained on normal duty, moved to alternative duties or suspended from duty. JPS employees must not use their official positions or relationships established in the course of their duty inappropriately to influence or interfere with action being contemplated by internal investigation by JPS or external law enforcement authorities.

The Ethics Office

The JPS Ethics Office is a confidential, impartial and professional resource available to all JPS employees. We promote an organizational culture that places the highest value on honesty, integrity, accountability, transparency and mutual respect. The Ethics Office is headed by the Compliance Officer who is responsible for:

1. Providing confidential, pragmatic ethics advice and guidance
2. Promoting ethics awareness and education initiatives on ethics, values and standards
3. Providing protection against retaliation and promoting whistleblowing
4. Addressing conflicts of interest
5. Consulting on, developing and clarifying standards, policies and principles

Ethics Office
Jamaica Public Service Company
6 Knutsford Boulevard
Kingston 5

Helpline: **888-429-5494**
Email: **ethicsoffice@jpsco.com**

Only the Compliance Officer has access to the hotline or email account. All breaches of the Code will be assessed, and as appropriate, investigated in accordance with the Security Department's standard operating procedures and the JPS Employee Discipline Policy. JPS will rigorously pursue disciplinary and other actions, including recovery of financial loss suffered by JPS, or referring a matter to local authorities.

We Do the Right Thing With Each Other

We prevent and detect fraud. We retain business records and safeguard corporate resources. Each day, we work safely and respect each other.

We Do the Right Thing with our Business Partners

We avoid conflicts of interest and use good judgment when doing business. We do not use or share material non-public Company information. We protect the confidentiality of JPS' business information.

We Do the Right within our Communities

We work hard for balanced and reasonable environmental solutions.

We Do the Right Thing With Our Government & Regulators

We deal with governments, regulators and companies honestly and openly.



As a JPS employee I WILL...

- ◆ Learn and understand the policies and standards applicable to my job
- ◆ Be honest, transparent, fair and trustworthy in all work-related activities and relationships
- ◆ When unclear about what to do, seek advice from my direct Supervisor, the Compliance Officer, a Human Resources Director or a member of the Legal Department
- ◆ Report actual or suspected ethical misconduct
- ◆ Cooperate with company investigations by providing complete and truthful information and related documentation
- ◆ Complete required certification of compliance

As a JPS leader I WILL...

- ◆ Be an example for employees by modeling ideal ethical business conduct
- ◆ Provide employees with the tools they need to understand and support our Core Values
- ◆ Create an environment where employees feel comfortable discussing ethical issues
- ◆ Create and maintain a diverse and inclusive workplace free of harassment
- ◆ Promptly respond to requests for guidance and reports of misconduct, engaging investigators and other resources as needed
- ◆ Support active investigations by providing timely information and encouraging teams to actively participate
- ◆ Facilitate ongoing compliance and appropriate disciplinary measures if misconduct is substantiated.

INTEGRITY

WHEN WORKING WITH EACH OTHER

JPS | Powering What Matters

Why it is important

We must uphold and promote the highest standards of ethical and professional conduct and carry out their duties with honesty, integrity and professionalism. Be a model of the behaviour you want to see in others in the workplace.

What to watch out for

- ◆ Employees or Directors who exaggerate or lie about their position or abuse it for personal benefit or for the benefit of other companies or organizations unrelated to JPS.
- ◆ Persons who intentionally misrepresent their function, official title or overstate the nature of their duties to anyone including external entities or the public.
- ◆ Persons who use their position as a means of convincing or coercing someone to provide favourable treatment.

Respect and Tolerance

All employees are expected to demonstrate respect, tolerance and professional behaviour towards our colleagues, customers and business partners. Your behavior reflects directly on JPS and impacts our credibility and reputation. That, in turn, has an effect on how our customers, regulators and partners perceive and do business with us and how well the Company will be able to carry out its objectives in the future.

Diversity

JPS is an equal opportunity employer. All aspects of employment will be based on merit, competence, performance, and business needs. We come from different backgrounds and, in some cases, varying cultures. Employee diversity is an integral part of JPS' business practices. Differences are respected and valued, and fair and equitable treatment will apply to all aspects of our business operations. We demonstrate respect for our colleagues and the public we serve irrespective of their race, gender, age, disability, religion or spirituality, skin colour, nationality, marital status, cultures, customs and norms or any other status protected under law.

Harassment

Harassment and abuse is strictly prohibited. JPS does not tolerate abuse of authority or harassment, including sexual harassment which is addressed in more detail in our Sexual Harassment Workplace Policy. We promote interaction in a manner that is free of intimidation, hostility, offence and any form of harassment or abuse, including abuse stemming from Gender-Based Violence. We will not tolerate victimization of employees who make a harassment complaint, and all leaders are required to promptly report all complaints to their respective HR Business Partner and the Compliance Officer.

Family and Personal Relationships

Family ties or personal relationships may affect impartiality and job performance. Employees are not allowed to be involved in any decision to select a business as a JPS vendor if they are related to the controlling parties of said business, nor can you serve in a role that either oversees any services or products provided to JPS by the business, or processes payments to it.

JPS does not encourage the employment of two or more persons from the same family in roles that are potentially conflicting. All applicants for a JPS position must disclose whether they are related to any JPS employee. While the family members may be hired, the employed family member cannot participate in the recruitment process.

For existing employees, familial or relationships with a subordinate or someone in your reporting line are prohibited in order to avoid potential conflicts of interest. Family members are also prohibited from working in the same unit.

If any of these situations occur, the employee must inform their Direct Supervisor of the relationship. The Direct Supervisor will assess the situation, consult as needed, and act with a view to managing any (potential) conflict of interest that may arise from the relationship. This may include excluding the relevant employee from carrying out the function in question (temporarily or permanently) or has the right to exercise the option of transferring one of the employees to another available position in the organization where no such conflict exists.

All familial or personal relationships must be noted on the personnel file(s) of the relevant employee(s) to assist with managing the potential conflict in the event of future personnel changes.

Outside of Working Hours

How you conduct yourself in your private life reflects upon how others view JPS. All employees must embody JPS' values in all that they do and say both inside and outside of the workplace. Although your social activities and interactions outside of work are generally private, you may be recognized and associated with JPS. Therefore, your behaviour as a representative of JPS transcends your work hours.

You must not act in ways that could bring disrepute to the Company, compromise its interests or undermine its position.

Outside Employment, External Activities and Board Positions

While working for JPS, you are expected to devote your time to your duties and responsibilities as per contractual obligations and expectations. You should not undertake outside work or activities that may interfere with your ability to carry out your role at JPS, either in terms of time or energy or by being incompatible, or perceived as incompatible with your status as a JPS employee, contractor, volunteer or intern. JPS does, however, generally support and approve activities that contribute to professional development and the support of JPS' mission.

Employees must not engage in activities that create or give the appearance of a conflict. External board appointments by members of the Executive Leadership Team (ELT) which create a conflict of interest must be approved by the JPS Board. Generally, prior approval for staff is not required for studies, or private unpaid social or charitable work unrelated to JPS' work, where those activities are conducted outside of working hours. However, it is advisable to discuss these with your direct Supervisor, the Compliance Officer, a Human Resources Director or a member of the Legal Department if you have any concerns.

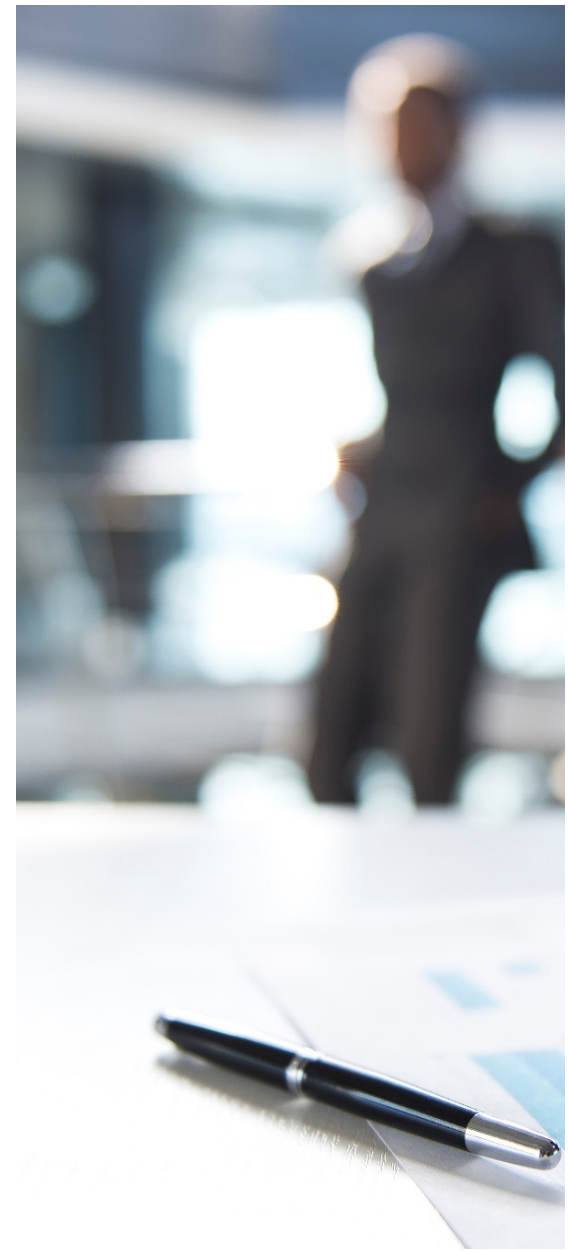
Violence in the Workplace

JPS is committed to providing a safe and secure workplace with a zero tolerance for incidents of workplace violence including Gender-Based Violence committed by or against employees, workers, vendors, customers or visitors. Prohibited conduct includes, but is not limited to, threats, physical abuse, sexual harassment, stalking, vandalism, arson, or sabotage. Employees must practice safe and respectful behavior on company property and any time they are conducting company business, regardless of the location.

Alcohol and Drugs in the Workplace

The misuse and abuse of drugs and alcohol interferes with a safe, healthy and productive work environment and is prohibited. JPS prohibits the use, possession, distribution or sale of illegal drugs by its employees. Employees are not to conduct JPS business while under the influence of illegal drugs or alcohol. The safe use of prescription drugs is permitted, provided that its use does not impair the employee's ability to safely perform his/her work, and does not place the individual or others at risk.

All employees are encouraged to utilize the Company's Employee Assistance Programme (EAP) if they are dealing with addiction or stress-related issues. The program is strictly confidential and supported by a trusted third party. For more information on this service, contact the JPS Wellness Officer.



Child and Forced Labour

JPS has zero-tolerance for the exploitation of minors, including sexual exploitation. JPS believes in the safety, education and well-being of children and is committed to ensuring that only children who are of the age of legal capacity, undergo internship and/or participate in work experience programs facilitated by the Company. Applicants for employment must attain seventeen (17) years of age in accordance with the HR Policies and Procedures Manual.

JPS does not support forced or trafficked labour directly or indirectly from any source including employees, third party contractors or its partners.

Health, Safety & Security

The business of supplying electricity is dangerous, so we protect ourselves, our coworkers and visitors by following all safety rules and procedures, completing safety training in a timely fashion.

JPS maintains, within reason, electricity services and core operations during any incident or emergency situation. Emergency situations may include severe weather or natural disaster, community violence, mass casualty, states of emergency/zones of special operations, fire, bomb threats, acts of terrorism, or a pandemic.

All employees must ensure the safety of themselves, team members and the general public while they maintain, protect and restore our services as effectively as possible. This applies not only to those on the front line but also to those who provide support services. We must be vigilant, disciplined, and always looking out for one another.

Breaches of safety protocols and refusal to participate in the required safety training will result in disciplinary action as guided by the JPS Employee Discipline Policy. Employees must report every actual or near miss accident or injury, illness, unsafe or unhealthy condition, incident, spill or release of material to the environment in line with Company reporting requirements. All leaders must ensure that all employees, contractors and visitors receive information and training in health and safety relevant to their roles and activities.

JPS aims to provide a working environment that is conducive to a reasonable level of security for all team members and visitors to the company. All persons at JPS facilities are expected to abide by the safety and security protocols and instructions that guide operations at that location. Threats, intimidation and violence will not be tolerated. The use of weapons or explosives on Company property, with the exception of employees or agents whose normal duties may require such activity is strictly prohibited.

Role Model for Safety

- ◆ Do not undertake work that you are not qualified to perform.
- ◆ Stop work - your own or others' - if you consider it unsafe.
- ◆ Play your part in protecting the environment.
- ◆ Be sure that your performance is not impaired, for example by a lack of sleep, alcohol, or any drugs – including prescription or over the counter medication.
- ◆ Speak up if you observe an unsafe or unhealthy working environment. Listen to others who speak up.
- ◆ Expect and encourage contractors and others with whom we work to comply with applicable Health, Safety & Environment (HSE) requirements.
- ◆ Report any accident, injury, illness, or unsafe condition immediately. Never assume that someone else has reported or will report a risk or concern.
- ◆ Know the emergency procedures that apply where you work

OUR SAFETY CREED

- No schedule is so important
- No job so urgent
- No emergency so great

That we cannot take the time to work safely and take care of the environment.



Conflicts of Interest

A conflict of interest is a situation in which your personal interests clash, or appear to clash, with the interests of JPS. You have an obligation to avoid placing yourself in such a situation.

When you have a potential or actual conflict of interest, it may be perceived that you have some personal bias that will make it difficult for you to maintain your impartiality, which in turn undermines public confidence. For example, an employee should not be affiliated with a JPS vendor.

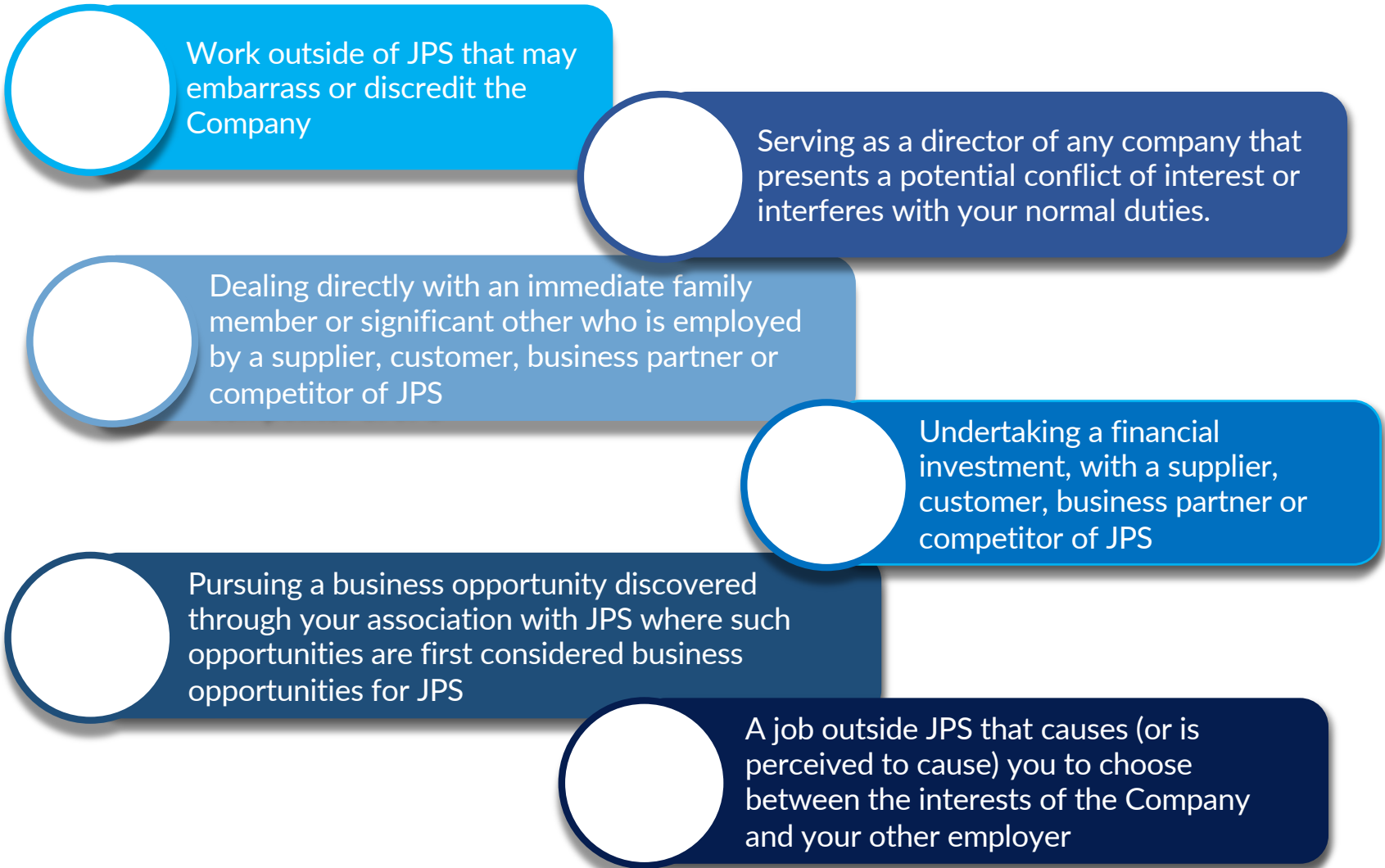
Even if the employee has the best intention to ensure that quality service is provided to JPS, the employee cannot protect and be loyal only to JPS when their personal interest in the vendor may cloud their judgement, and allow others to suspect that the employee may not be objective and impartial.

Post Employment

Whether you resign, retire or are involuntarily terminated, your obligations of confidentiality do not cease when your service ends. You have a perpetual obligation to maintain the confidentiality of proprietary and other non-public information that came to your knowledge through your work at JPS.



Examples of Conflicts of Interest:



Trading Securities Legally and Competing Fairly

Laws governing buying and selling of stock have been established to protect the interests of all market participants. JPS is committed to ensuring that our employees abide by these laws and the relevant stock exchange rules. At the heart of improper securities trading is knowledge of "material non-public information".

Employees in possession of material non-public information of the Company are prohibited from using such information to trade securities or pass along non-public material information to anyone else who trades on that information. Additional prohibitions and requirements may apply to JPS' directors and certain other officers and employees. We do not attempt to restrain or limit trade by engaging in boycotts, disparaging competitors or underhanded tactics. Violating antitrust or anti-competitive laws and regulations in any country may lead to fines, loss of business, damage to JPS' reputation and possible criminal sanction.

Disclose, Disclose, Disclose.

JPS requires all job candidates, regardless of level, to complete a separate pre-hire Conflict Of Interest Disclosure Form. The form provides for the disclosure of relationship and limited financial interest information so that controls can be put in place before new employees commence employment, in order to prevent potential conflicts of interest from developing into actual conflicts.

At the beginning of the calendar year, all employees and members of the Board of Directors are required to complete the Annual Code of Ethics Questionnaire, as updated or amended from time to time by the Company. Every situation that arises thereafter that meets the criteria requiring disclosure, must be documented on the Disclosure of External Interest Form and submitted to your direct Supervisor and the Compliance Officer.

I WILL...

- ◆ Know, understand and comply with applicable health and safety rules and regulations
- ◆ Actively identify hazards, prevent and correct unsafe conditions, and demonstrate safe behaviors at every level
- ◆ Seek advice when I am unsure of how to perform a task safely
- ◆ Promptly report all health and safety incidents, including near misses, in accordance with department expectations
- ◆ Follow applicable procedures when disposing of surplus or obsolete property
- ◆ Report actual or suspected theft, damage or unauthorized use of company property
- ◆ Comply with company policies and procedures governing the procurement process
- ◆ Report any anticompetitive activity to my supervisor or another member of my management team, my HR business partner, a member of the Ethics Office, or the Ethics Line

I WILL NOT...

- ◆ Take short cuts that could endanger myself or the well-being of others
- ◆ Fail to promptly report or misrepresent the occurrence or severity of a safety incident
- ◆ Use company resources for my personal benefit in a manner that creates additional costs for the company, interferes with work duties or violates company policy
- ◆ Use company property or information for illegal activities or personal gain
- ◆ Take advantage of market power to eliminate or threaten a competitor or potential competitor in that market
- ◆ Participate in collusion by any trade association or other industry group regarding membership restrictions, sharing information or desired governmental actions to facilitate coordinated behavior to restrain competition

INTEGRITY

IN WORKING WITH OUR BUSINESS PARTNERS

JPS | Powering What Matters

Why it is important

Our vendors and suppliers are integral to the success of our company, and we choose our partners carefully. The decision to select a supplier is based on fair and objective criteria, such as technical, commercial, or other valid business reasons. In turn, we expect our suppliers of goods and services to share and adhere to our core values and apply them to the way they do business. We aim to establish long-lasting “win-win” relationships that create value for all stakeholders.

What to watch out for

- ◆ Fraudulent activity
- ◆ Collusion amongst employees and external parties to defraud the business or for personal gain
- ◆ Inaccuracies or inconsistencies in supplier engagement

Zero Tolerance for Corruption

JPS operates with zero tolerance for fraud and corruption, so there is no acceptable excuse for JPS employees, vendors or contractors to engage in bribery, fraud or corruption. As stewards of JPS, every employee is expected to be on the lookout for fraudulent activity. Reports of suspected fraud should also include observations on the internet or social media, for example, of persons appearing to impersonate JPS or its employees to solicit funds via any medium.

Bribery and Corruption

Fraud and corruption in any form are unacceptable at JPS. This is broadly applied and includes but is not limited to bribery, bid rigging, kickbacks, reciprocity, theft, embezzlement, forgery, making false statements and corrupt practices.

At JPS, we take our legal requirements and ethical obligations to report accurate and complete financial information very seriously. Our shareholders, regulators, customers, employees and others expect us to do no less. The Company has policies and procedures to ensure that all transactions have proper management approval and are properly accounted for in our books and records, and that our public reports and financial statements fairly and accurately reflect these transactions.

All employees who have any responsibility for financial transactions must to know and comply with JPS' accounting controls and procedures. We must always foster an atmosphere that enables the Company's independent auditor to exercise objective and impartial judgment.

JPS employees are expected to be candid, provide all information requested, and cooperate fully with our independent auditors and any other agencies legitimately reviewing our operations.

Gifts, Awards and Payments

Accepting gifts, entertainment, and other business courtesies from any business partner, existing or potential vendor can create the appearance of a conflict of interest, especially if the value of the item is significant and given frequently.

Generally, accepting inexpensive non-cash gifts or tokens, not exceeding a market value of US\$50 is permitted. An employee must not accept any gift exceeding this amount. However, the Compliance Officer may in exceptional circumstances, make a waiver of this value where justified. All gifts exceeding the US\$50 must therefore be reported to the Compliance Officer who will record and maintain a log of gifts which may be periodically reviewed by Internal Audit and/or the Company's external auditors.

You must never accept cash, cash equivalents (gift cards) or discounts not available to all employees, neither must you accept business courtesies of any kind that could be reasonably viewed as inappropriately influencing a business decision or creating a business obligation on the recipient.

If you are considering making a gift to a Government official, representative of any regulatory body, political organization or union representative, you must first consult with the Compliance Officer.

Gifts given with the intent to bribe, make a kickback, exchange for inappropriate advantage in the Company or place undue influence, are illegal and against the policy of the Company and are not aligned with the way JPS conducts business. If there is a concern about the size or value of a gift or if you have any doubts regarding your obligations under this section, please consult with your Compliance Officer.



Working with Third Parties

JPS often engages third parties, including contractors, vendors or suppliers. It is essential that these third parties align with the values, ethical standards and principles upheld by our Company. We must be certain to conduct due diligence, including by vetting principals and owners before contracting with any such entity or individual in order to ensure we avoid engaging in business transactions with parties who do not meet JPS' expectations with regard to ethical behaviour and business practices. Further, in engaging with JPS, all third parties are expected to demonstrate these values in their operations and partnerships. Failure to align with these principles may result in the reevaluation or termination of business relationships.

There are specific procurement restrictions and guidelines that must be followed, and you may contact the Logistics & Inventory Department for further information. If you require goods or services from vendors, contractors or consultants, you must follow the formal JPS Procurement Policy for competitive bidding and the respective approval process. All vendors are expected to meet or exceed JPS' expectations with regard to ethical behaviour and business practices, and must agree to abide by our Code Of Ethics & Business Conduct.

Employees must adhere to the Procurement Policy guidelines for emergency purchases. With adequate planning, the Logistics & Inventory Department and other internal stakeholders should be engaged with sufficient notice to fully comply with the procurement requirements. The Company will apply sanctions to employees who abuse the process as guided by the JPS Employee Discipline Policy.

JPS respects the confidential information of third parties, including competitors, suppliers and customers. Confidential information is information about another company that is not in the public domain, has value and could be used for commercial benefit. The unauthorized use of competitor's confidential information risks being a serious infringement of the law, leading to significant penalties for JPS and individuals.

Local & International Laws

When doing business locally or internationally, you must know and follow the laws of the country you are working in as well as any Jamaican laws that may apply. Legal requirements are varied and complex, so employees responsible for negotiations outside of Jamaica should seek legal advice regarding payments, record keeping and export/import control restrictions.

Contact the Legal Department with questions regarding these and other local laws, regulations and conventions governing international business relationships.

Fair Competition

At JPS, we believe in doing business honestly and transparently. We will always participate in the marketplace fairly and lawfully, and we prohibit activities that reduce competition and restrict trade such as agreeing to fix prices or rigging bids.



I WILL...

- ◆ Report to work fit for duty and free of the effects of illegal or prescription drugs and alcohol
- ◆ Report any actual or suspected on-the-job alcohol or illegal drug use
- ◆ Cooperate in all drug screening activities required by law or company policy
- ◆ Treat others with respect and dignity any time and any place I represent the company
- ◆ Think carefully before making offhand comments or jokes and be sensitive to unintentionally offending others
- ◆ Promptly report perceived harassment to my supervisor or another member of my management team, my HR Business Partner, or member of the Ethics Office or the Ethics Line.
- ◆ Seek advice from the Legal Department before sharing confidential proprietary information with a supplier through an industry association or other means

I WILL NOT...

- ◆ Possess, use, sell, arrange for the sale of, manufacture, dispense or transfer illegal drugs, illegally obtained prescription drugs or alcohol on or off company property while conducting company business
- ◆ Consume alcohol on the job, during working hours (including meal breaks) or when on call
- ◆ Appear for or return to work in an impaired state
- ◆ Engage in verbal or nonverbal threats, insults, abuse or ridicule (sexual or otherwise) or any other form of bullying or disrespect
- ◆ Make offensive remarks or slurs, including inappropriate jokes
- ◆ Make or attempt to make intimate, unwelcome or offensive physical contact including blocking normal movements
- ◆ Provide inconsistent information about a request for proposal to competing bidders or divulge a quote from one supplier to another supplier

INTEGRITY WITHIN OUR COMMUNITIES

JPS | Powering What Matters

Why it is important

We strive to meet or exceed all applicable environmental laws and regulations which govern our operations. When necessary, we supplement local regulations by implementing prudent business practices to protect the environment, public health and natural resources. We also work with governmental agencies to ensure our processes are financially reasonable but which will enhance and protect the environment.

What to watch out for

- ◆ Electricity theft
- ◆ Internal bleeds caused by fraudulent activity
- ◆ Employee activity that is harmful to the environment or goes against Jamaica's environmental laws
- ◆ Employee activity that takes unfair advantage of customers or disenfranchised groups of society

Protecting the Environment

We are committed to protecting the environment and respecting the communities in which we operate. We must avoid damage to the environment and related impacts on communities in the course of carrying out our responsibilities.

Protecting Company Resources

While working for JPS, you will have access to numerous Company assets and resources. You are responsible for their appropriate use and protection, and you must use prevent waste or misuse. Our assets include money and physical items, as well as intangibles such as time, information and technology.

As an employee, you have a responsibility to report incidences of power theft or the misappropriation of assets. Regardless of the dollar value, the misuse or theft of any JPS resource is unacceptable and prohibited.

Protecting Physical Assets

The property and assets of JPS are intended to carry out the business of the Company. You are responsible for the professional use and reasonable care of the items assigned to you for your work such as computers/tablets, mobile phones, power tools and vehicles. Avoid using office supplies or other JPS material for personal purposes.

As Jamaica's supplier of electricity, our facilities might become the target of terrorists and others with ill intent. If you see an unauthorized person attempting to gain access to JPS facilities, call the Security Department or the Police immediately.

JPS Finances

Employees are expected to act responsibly and exercise sound judgment with respect to matters involving Company finances. You must not misuse nor permit the misuse of JPS funds including spending monies on matters unrelated to the work of JPS, or engaging in wasteful or inefficient expenditure.

If, in the course of your duties, you spend money, enter into contracts, or maintain financial records on behalf of the Company, you must keep accurate and complete records, submit accurate and complete reports as required, and comply with JPS' internal controls, including controls relating to the proper review, approval, and execution of contracts. If you have questions about these obligations, please contact the Logistics & Inventory Department or the Compliance Officer.

Time – Yours and Others

JPS' people are its greatest asset. You are expected to manage your time efficiently, and apply yourself to your duties with maximum productivity and competence, in order to best contribute to the effectiveness of the Organization. If you are a leader, do not ask, require or permit subordinates or coworkers to spend working hours on non-organization tasks, do not abuse your authority, or your colleagues' good will, by asking that they perform personal tasks.



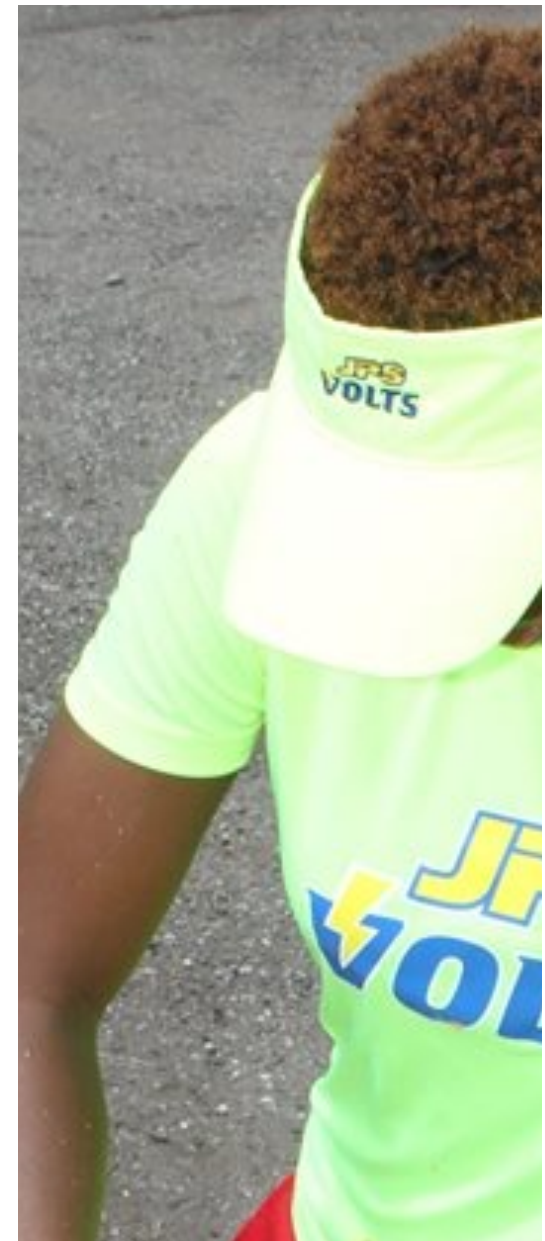
The JPS Brand

Our brand and reputation are some of our most valuable assets. The misuse or loss of such assets could have a serious financial impact on the company. We must each take steps to secure the integrity of our brand, and live up to the reputation for excellence it represents.

Responsible Marketing

Employees who are involved in JPS marketing activities must:

- ◆ At all times, respect JPS policies and applicable marketing laws
- ◆ Describe our products/services and their effects truthfully, accurately and transparently, with factual information
- ◆ Ensure there is sufficient information for customers to understand how to use our products and services
- ◆ Ensure our marketing is based on the reality of the claims JPS makes
- ◆ Comply with our values and JPS Brand Guidelines
- ◆ Ensure our marketing reflects and respects generally accepted standards of good taste and quality, in the context for which it is designed, showing awareness of the wider society and sensitivity to the diversity of the Jamaican society



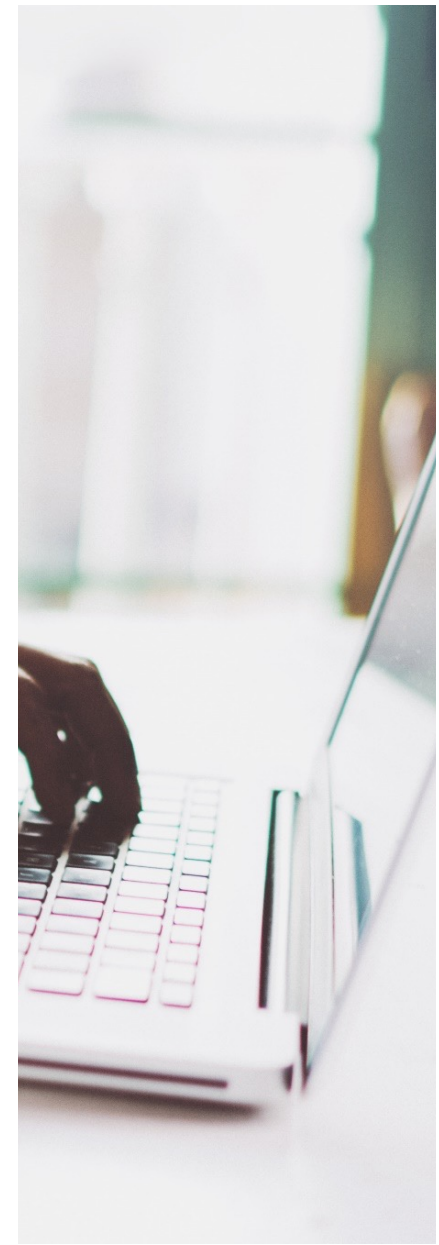
Systems, Technology & Devices

JPS communication devices, computers, email, Internet and other technologies are intended for official business purposes. JPS has the right to monitor and review all information contained in and communicated via these systems. As such, there is no right of privacy when using JPS systems and equipment.

Any e-mail you send or receive using company property belongs to JPS. The Company may use them for any purpose they see fit, or they can be obtained from the Company in a lawsuit.

You are prohibited from using the JPS resources to access, send, copy or forward any material that is harassing, offensive, sexually oriented, illegal or defamatory. Any improper use of JPS systems including but not limited to sending harassing, insulting or illegal emails, streaming or downloading movies or viewing pornography using the JPS network, abuse or over use of office technology is prohibited. Examples include making personal long-distance calls using JPS telephones, emailing inappropriate media or printing personal documents without permission.

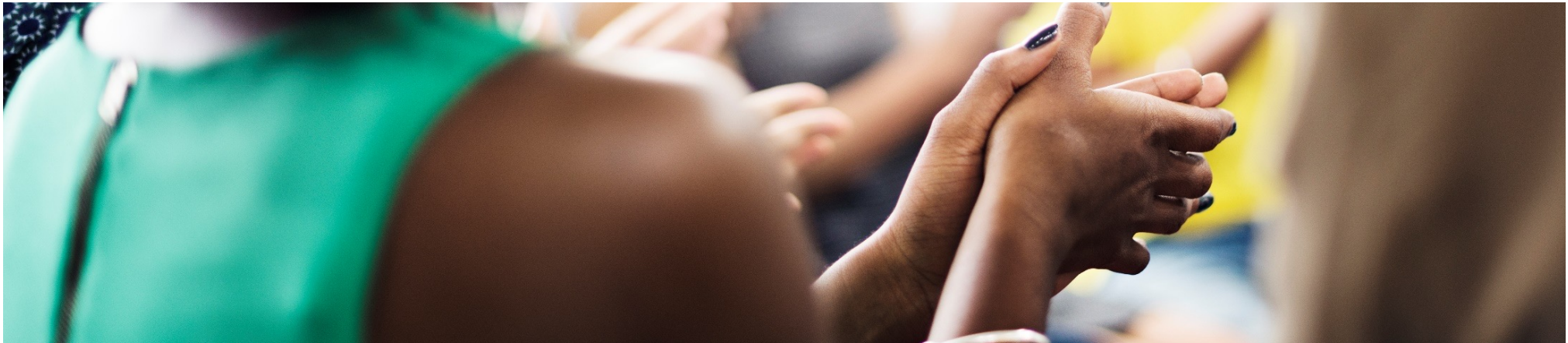
We all have a responsibility to maintain the security of JPS' technology and systems, as well as its records and other information that we may come into contact with. Do not access systems to which you are not authorized, or help anyone else to do so. Use only your assigned password to access your computer, and do not share your password or leave it visible to others. To protect JPS information from disclosure, lock your computer even if you leave it only for a few minutes. Do not "borrow" another employee's credentials or identification card and do not loan yours to anyone.



Digital Media, Publications and Public Speaking

Sharing material information with our shareholders and others at the right time and in the right manner, is required by law and is also critical to the Company's success. To ensure consistent and accurate communication on behalf of the Company, a select group of JPS employees have been designated as points of contact for the media, financial community, government bodies, shareholders, analysts, lenders and regulators. If you are not a designated point of contact and you are contacted by any of these bodies, refer them to JPS' Corporate Communications department.

You are prohibited from discussing your work duties or work environment or any other matter concerning the Company on your personal website, blogs or on social networking sites. Do not publish anything that you would not want to see reported in the news, and nothing that can serve to harm the Company's reputation. Use good judgement and professional discretion in engaging in any social media activities, protecting the reputation of the Company and your colleagues at all times.



Sensitive Information

Despite transparency initiatives, there is much information at JPS that must remain confidential, including investigation files, personal details of employees, medical records, vendor bids and proprietary information such as intellectual property and more. Do not disclose JPS confidential or proprietary information that has not been made public to anyone except those within JPS with a legitimate need to know as part of their official duties, as appropriate in the normal course of your work or as authorized by your direct Supervisor.

Illicit activities to obtain information including theft, unauthorized data transfers, trespassing, eavesdropping or computer hacking are all prohibited.

Employees must exercise the utmost discretion in regard to all JPS work. If information has not been made public, it may be confidential – if in doubt, consult your direct Supervisor, the Compliance Officer, a Human Resources Director or a member of the Legal Department.

- Cell phone calls, elevator conversations and other public conversations can result in the inadvertent disclosure of confidential business information. Avoid these conversations where they maybe be overheard.
- If you need to discuss confidential business information with a customer, supplier or business partner, have them sign a confidentiality agreement. Contact the Legal Department for assistance in properly executing this agreement.
- Never initiate a conversation with the press on matters involving JPS unless you have been given prior approval or the requisite authority and briefing on the subject.
- Do not discuss any JPS information, whether material, confidential or otherwise, in internet chat rooms, message boards, blogs or on social networking sites.

I WILL...

- Understand the definition of sensitive information as it applies to my work and take steps to reduce the risk of data loss or exposure and security breaches
- Exercise caution when discussing sensitive information in public areas within and outside the workplace
- Protect network passwords and other security protocols from disclosure
- Promptly report a lost or stolen computer, cellphone or other portable device
- Notify IT of any unusual activity involving information systems and associated resources
- Understand and promptly disclose situations where I have an actual or potential conflict of interest
- Act in the best interests of JPS any time I am asked to make a decision on behalf of the company
- Seek approval from a member of the Executive Leadership Team and the Ethics Office for certain employment and business transactions

I WILL NOT...

- Request or demand romantic or sexual favours, explicitly or implicitly, as a condition of employment, promotion, transfer or any other employment actions.
- Disclose sensitive information to co-workers or third parties who are not authorized to receive or have no need to know the information
- Use sensitive information for personal benefit or for the benefit of persons outside of JPS
- Share my network password or other security protocols with others
- Download or install software that has not been approved for company use by IT
- Personally profit from an opportunity available to JPS that I discover using company assets, information or my position at the company
- Personally benefit from a supplier selection or other business decision made on behalf of the company
- Participate in the selection process or oversee the work of a business in which I have an ownership interest, or someone I have a close personal relationship with is employed or has an ownership interest

INTEGRITY

WITH OUR GOVERNMENTS & REGULATORS

JPS | Powering What Matters

Why it is important

It is our duty to follow local and internationally applicable laws and ethical standards prohibiting bribery and corruption, and to avoid inappropriately influencing the decisions of the Jamaican Government and local or overseas regulatory bodies, and the purchasing decisions of the entities that buy our products and services.

What to watch out for

- ◆ Attempts by employees or Directors to influence decisions or outcomes
- ◆ Attempts by external parties to influence Company purchasing decisions or government contracts

Independence and Impartiality

While working for JPS, you represent the ideals of JPS and must seek to protect the best interests of JPS. You must act with loyalty to JPS and not seek or take instructions from any other entity, political interest or influencer; be independent, fair and objective in the conduct of your duties.

Political Activity

Employees are free to belong to a political party provided that such membership does not entail action inconsistent with the policies and procedures of the Company. You are prohibited from wearing politically themed clothing or other paraphernalia while executing your role as an employee of the Company. The use of company resources including, but not limited to, printing flyers, sending notifications, influencing teams to do work in select constituencies for political purposes is strictly prohibited.

Interacting with Public Officials

JPS employees regularly interact with public officials responsible for laws, regulations and policies that affect our company. We must ensure that these interactions and relationships are professional and comply with all related laws, regulations and rules.

Government contracts are subject to extensive regulations, so make sure you are aware of applicable rules prior to engaging in government bids or contracts.

Accurate Reporting and Records

JPS maintains its business and financial records in a variety of formats, including paper, digital, audio/video recording. You must cooperate in accurate record keeping of the Company. It is not only important to know the location of business records but to properly file and organize them or archive them in accordance with the Company's policy. Any JPS record could be used as evidence in a lawsuit. The improper destruction of records could have serious consequences - including civil and criminal penalties - for the Company and for you personally.

Be certain to code or label information confidential or proprietary as warranted in order to protect it from intentional or inadvertent disclosure.

You must prepare and deal with all records truthfully and sign, share or enter records only to the extent you know they are correct and have authorization or instruction to do so.

Requirements for retaining business records are governed by good governance principles and any applicable laws. JPS also has an obligation to prevent the destruction of documents related to its employees, maintenance activities, projects, investigations, contracts, accidents and other similar incidents but especially records relating to expenditure. You must familiarize yourself with the Company's retention policies.

JPS is committed to the transparency and integrity of our publicly-filed financial reports and other communications. Our principal executive officer, principal financial officer, and people who perform similar functions are responsible for ensuring that the disclosure in JPS' periodic reports is full, fair, accurate, timely, and understandable.

I WILL...

- ◆ Seek guidance about the laws that apply when visiting or beginning business in a new country or international territory
- ◆ Avoid making a facilitation payment, and seek assistance and approval from the Legal Department if such a payment is absolutely necessary
- ◆ Conduct appropriate due diligence when engaging a third party to conduct activity on our behalf
- ◆ Promptly report any requests for payments, gifts or other improper exchanges to the Ethics Office

I WILL NOT...

- ◆ Offer, promise or authorize anything of value directly or indirectly to a government or foreign official if there is reason to believe the expenditures will be used illegally
- ◆ Do business with others who do not share JPS' commitment to corruption-free business practices
- ◆ Overlook or ignore red flags that could indicate corrupt activity taken on our behalf by a third party
- ◆ Give or accept any gift, entertainment or other business courtesy that may be perceived by others as an attempt to influence a business decision
- ◆ Solicit gifts, favors, travel or entertainment from a supplier or other business partner
- ◆ Allow a supplier or other business partner to pay for my overnight travel without prior documented approval from a member of the Executive Leadership Team
- ◆ Accept cash from a supplier or other third party
- ◆ Agree to provide payments, contribute to charities, or make political contributions or other payments in return for favorable treatment

What is the right decision to make?



Q2: I have worked at a plant for 15 years and one of the Company's vendors has asked me to help them with a project at a non-JPS power plant. Is that ok for me to do during my off hours?

A: You need to discuss this opportunity with the Compliance Officer so that all the factors can be assessed, including but not limited to what JPS-related information will be needed from you and how it may affect your work at JPS.

Q3: I have been traveling on JPS business for over a week representing the Company at high-pressure meetings and I'm having a hard time relaxing. Can I include a back massage in my expense report?

A: NO. Massages and other personal services are non-reimbursable expenses. A business expense is ordinary to the course of your job and necessary. This means that it facilitates the Company's business. You may read the JPS Accounting Policy and Corporate Credit Card Policy for more details.

Q1: My uncle owns the plumbing company that provides services to the JPS Head Office. Do I need to report this?

A: YES, Contact the Compliance Office and disclose that your uncle is doing business with JPS. The Compliance Officer will ask you a few questions to determine if a conflict of interest exists, and what steps to take, if any.

Q4: A popular social media news site says that JPS is about to sell a power plant. I know this is not true. Should I post the correct information?

A: If you are not authorized to communicate with the public in behalf of JPS, then NO. Report it to the Corporate Communications Department.

Q6: Can I agree with a competitor not to buy from XWY Corporation if the price goes above a certain dollar limit?

A: NO. Any agreement between competitors relating to boycotting a supplier is against the Fair Competition laws and regulations.

Q5: If my department runs out of training funds but has unused finances in another budget area, can I use the additional funds to pay for training?

A: NO. A request must be made to your direct Supervisor and to the Finance Strategy Department for the funds to be transferred from one cost item to another. This will facilitate appropriate tracking of how your budgeted funds have been used.

Q7: I was on my way to a JPS meeting and was stopped for speeding. Since I was on my way to do JPS business, can I be reimbursed for the speeding ticket?

A: NO. Speeding tickets and other traffic violations are not reimbursable.

Q8: I don't have time to verify all the invoices that cross my desk. If my support team has checked it, then can't I just sign it without verification?

A: NO. As the authorized signatory, you are responsible for the accuracy of the invoice submission and the verification that the product or services being paid for were delivered according to the contractual agreement.

Q9: Is it ok for me to use JPS' computer, internet access and/or phone for personal use?

A: YES, as long as it does not interfere with your job responsibilities, create additional cost or violate the company policies or applicable laws.

Q10: I was at an event where my Manager was drinking heavily. He was called to work from the event and left to go back to the plant even though his speech was slurred. Should I report this?

A: YES. Employees are prohibited from working under the influence of alcohol, and you are required to report any observations of breaches of the Code.

Q8: During a recent storm a tree fell across my back fence and needs to be cut before it does any more damage. I am authorized to operate a bucket truck. Can I borrow one and some other tools to cut up the tree?

A: NO. This is not an appropriate use of Company resources.

Q11: When I complete a project, can I throw out the project documentation?

A: NO. Please refer the JPS records management guidelines for the retention requirements for all types of documents and files.

Q9: I support a political candidate in my community who is aligned with JPS' position on loss reduction. Will the Company reimburse me for my contribution to his campaign?

A: NO. Personal contributions to political candidates, campaigns or parties is not reimbursable.

Q8: I overheard a Supervisor making inappropriate comments about a co-workers physical appearance and making sexually suggestive comments about them during a meeting. What should I do?

A: Report the incident to your direct Supervisor or the Compliance Officer through the Ethics Help Line.

Q10: Our department is hosting a function and would like to invite the Minister of Science, Energy & Technology. It would entail flying him from his office location to our function. May we invite him?

A: In order to pay for travel arrangements for any government official, you must first have written approval from your Director and the Compliance Officer.

Q11: What happens if I accidentally violate the Code, another policy, or a law/regulation?

A: It depends; every situation is unique. Any and all cases of employee misconduct will be reviewed by the respective leader in collaboration with People Operations and the Legal Department to ensure proper investigation and resolution, and/or disciplinary action in accordance with the Employee Discipline Policy.

Glossary

Abuse of authority is the improper use of one's position of influence or power.

Asset misappropriation occurs when an employee steals or facilitates theft of electricity, steals cash or assets, such as equipment, office supplies, inventory and intellectual property from the Company.

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action that is illegal, unethical or a breach of trust. This may be in the form of money, gifts, loans, donations, rewards or other advantages.

Child labour is subjecting a person, deemed to be a child, to any work that harms a child's well being and hinders his or her education, development and future livelihood. Child labour is work which by its nature and/or the way it is carried out, harms, abuses and exploits the child and deprives the child of an education.

Compliance Officer is the Company Secretary and has responsibility for the JPS Compliance Program, its maintenance, communication and enforcement.

Company asset refers to everything belonging to JPS, including its money or product, employees' time at work and work product, computer systems and software, electronic and communication devices, Company vehicles, proprietary information and Company trademarks.

Competitor is any business entity other than JPS or our subsidiaries that provides similar products or services as JPS or is actively considering doing so.

Corruption is the act of doing something with an intent to give an advantage inappropriate with official duties to obtain a benefit or to harm or influence the actions of another party.

Family or familial includes spouse, children, siblings, parents, grandparents, aunts, uncles and in-laws as well as any other family member who lives with you or who is otherwise financially dependent on you or on whom you are financially dependent.

Fraud is any act of omission whereby an individual or entity knowingly misrepresents or conceals a material fact in order to obtain an undue benefit or advantage or avoid an obligation and/or in such a way as to cause an individual or entity to act or fail to act to his/her detriment.

Gender-Based Violence is violent conduct or acts directed towards an individual based on their gender. It can manifest itself in various forms such as physical, psychological, mental, economic, or sexual harm or suffering. The behavior may be physical, sexual, emotional, economic or psychological actions or threats of actions that influence another person. This includes, but is not limited to any behaviors that frighten, intimidate, terrorize, manipulate, hurt, humiliate, blame, injure, or wound someone.

JPS employees for the purposes of the Code includes contract and permanent employees, consultants, volunteers, interns, members of the Board of Directors and members of Committees of the Board of Directors.

"No means No" – if a person declines a suggestion to engage in a personal relationship, let it go. As a Leader it is never appropriate to engage in a personal relationship with a subordinate. If the person approached is made to feel uncomfortable, this can be categorized as sexual harassment.

Public officials are considered any Government employee and representative, including elected or appointed officials in government, regulatory commissions and other oversight agencies.

Sexual exploitation means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

Sexual harassment is any unwelcome sexual advance, sexual comment, request for sexual favour, or any other behaviour of a sexual nature that can reasonably be expected to cause offense or humiliation to another person, even if it is a single incident. This includes the offer of money or preferential treatment in exchange for sexual favours.

Workplace harassment is any improper and unwelcome conduct, including bullying, touching, words or actions that can reasonably be expected to cause offense or humiliation to another person, marginalize or exclude a person or unreasonably disrupt that person's work.

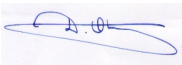
Policies Referenced in The Code

1. Diversity Policy
2. Security for Managing our Human Resources Policy
3. Social Media Policy
4. Employee Discipline Policy
5. Disaster Preparedness & Recovery Policy
6. Procurement Policy
7. JPS Brand Guidelines Policy
8. JPS Accounting Policy
9. Employee Records Management Policy
10. Sexual Harassment Policy
11. HR Policies and Procedures Manual



Document Approval

This Code of Ethics and Business Conduct is a guide to help each of us resolve ethical issues in an increasingly complex operational environment and also serves as a declaration of our commitment to the highest standards of integrity. While business practices may change over time, our dedication to honesty, integrity, transparency, accountability and mutual respect remain constant. We believe that conducting our operations ethically is critical to our success and we should all be proud of this commitment and pledge:



Damian Obiglio
Chairman

Feb-13-2025 EST

Date

Updated in May 2024

Jamaica Public Service Company

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