

	Title: Code of Business Conduct	Revision #: N/A
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	Approved by: Board of Directors	Issue date: January 31, 2025

1. OVERVIEW

Factories Corporation of Jamaica (FCJ) is one of the drivers of the Government of Jamaica's economic growth and job creation agenda by providing real estate solutions for a variety of industries such as light manufacturing, agro-processing, warehousing and business process outsourcing. The Corporation also has responsibility for the scrap metal trade. FCJ, is the largest provider of real estate in Jamaica with approximately 157,000 square meters. FCJ has over one hundred facilities island-wide strategically situated, whether in close proximity to the island's ports, or commercial districts. The Corporation provides standalone buildings as well as spaces in industrial estates. Soon the Corporation will be offering Special Economic Zones. Today, FCJ manages over 157,000 square meters of industrial space for small medium and large enterprises, which has facilitated the employment of approximately 5868 individuals in a wide cross-section of industries. FCJ stands firm by its mission to satisfy customer needs and enhance national development by providing quality industrial and commercial spaces at a competitive rate. With the prospects that the Business Process Outsourcing industry now holds, the organization is embarking on another phase of expansion to cater to that industry. FCJ is now developing projects which will be suitable for Special Economic Zones. This will facilitate transnational manufacturing and distribution companies and facilitate value-added activities.

2. INTRODUCTION

Adherence to the provisions of the Code of Business Conduct is mandatory (except where the laws of the country dictate otherwise), and full compliance is expected of all employees, at all levels. Additionally, there is an expectation of any employee who becomes aware of an infraction of this Code or any misconduct by any other employee, to report the facts immediately to his/her supervisor or to higher authority. This Code is to be used simultaneously with the Contract of Service and/or any other document which the employee is required to sign or has signed; and by which the terms and conditions of employment with the Factories Corporation of Jamaica (hereafter referred to as the Corporation) are established or expanded. The Corporation is fully owned by the Government of Jamaica (GOJ), with the Ministry of Economic Growth and Job Creation now having Portfolio responsibility. All employees are therefore expected to fully understand and study the policies and guidelines relevant to the Government of Jamaica's Public Service, in conjunction with the material contained in this Code. The principles set out in this Code are not exhaustive of the professional and ethical responsibilities of employees. Failure to comply with the rules and regulations set out within this code will result in disciplinary action in keeping with the

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terms outlined in the applicable Disciplinary Policy. Furthermore, violations of this Code may also be

violations of the law and may result in severe criminal penalties for you, your superiors and/or the Corporation.

3. COMPANY OBJECTIVE

The Corporation believes that its corporate conduct must contribute to the goals and objectives of Jamaica. It is geared towards providing economic growth enabled by world class infrastructural development and is executed in a professional and cost-effective manner that facilitates the creation of wealth for our stakeholders, clients and staff.

4. COMPANY VALUES

The Corporation places emphasis on the manner in which employees relate to clients and each other in the course of conducting day to day business. The fundamental principles and values by which the Corporation should abide are outlined below:

4.1 Core Values

We hold a deep and abiding respect for each client, every colleague, every board member and all our stakeholders. We aim to always provide state of the art infrastructure for new developments to support current business needs for our clients. We commit to the relentless renewal of our enterprise through the constant training of our people at all levels. We commit to rewarding the good performance by our employees through our Performance Incentive Scheme.

4.2 Client Service

The Corporation is committed to offering the highest quality service synonymous with our Service Vision. Client service will always be administered in a professional manner in keeping with FCJ's service standards.

4.3 Corporate Citizenship

The Corporation is committed to engaging in those actions that will ensure its continued viability while recognizing its role as a GOJ Public Body. The scope of the Corporation's social responsibility will focus on: ethics, employment practices, community outreach and stakeholder commitment.

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4.4 Statutory and Legal Compliance

The Corporation will at all times comply with not only with the letter of the law but also the spirit of the constitutional laws and regulation of Jamaica. It is expected that all of its directors, officers and employees shall, in carrying out their duties to the Corporation, rigidly comply with these said laws. No director or employee should assume that the Corporation's interest ever requires otherwise. Moreover, no one in the Corporation has authority to give any order or direction that would result in a violation of this policy.

It should be noted however, that agreements or arrangements need not necessarily be in writing to be contrary to law, since a contravention may be inferred from the conduct of the parties. Accordingly, employees must ensure that their conduct cannot be interpreted as being in contravention of laws governing the affairs of the Corporation.

It is recognized that on occasion there may be legitimate doubt as to the proper interpretation of the law. In such circumstances. It is required that employees refer the case to a higher authority; ultimately guidance may be obtained from the Corporation's Legal Officer.

4.5 Privacy and Confidentiality

The Corporation will carefully preserve the confidentiality of communications and transactions with its employees, clients, and relevant stakeholders in accordance with GOJ guidelines and FCJ Communications Policy.

4.6 Equal Employment Opportunity

FCJ commits a transparent and accountable employment and promotion process. The employment and promotion of an individual will be based upon that individual's experience, qualifications, competency and potential. There shall not be any discrimination management and employees against any other employee or potential employee because of race, religion, colour, gender, age, marital status or political affiliation.

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5. CONDUCT OF EMPLOYEES

5.1 Role of Management

Management has the responsibility to ensure that employees adhere to the highest standards of ethical behaviour and to the policies and practices of the Corporation. Management must accept reports of potential misconduct which are to be handled in a fair and appropriate manner and be escalated to the highest levels where applicable. In this regard full observance of the provisions of the Whistle Blower Policy is mandatory

Management is also expected to assume overall responsibility for the enterprise risk management process – from the identification to the mitigation and reporting of risks.

5.2 Integrity

There is a requirement for all employees to act honestly, fairly and in a reasonable manner always, to adhere to the truth and not to mislead directly or indirectly by words or deeds.

Employees are required to provide all clients, suppliers, contractors, associates, fellow employees and all other stakeholders, with equally courteous, fair and equitable treatment,

free from all personal bias or prejudice on matters including but not limited to race, nationality, creed or gender.

No information gained through the Corporation's operations shall be used by employees for any purpose other than the purpose intended by the Corporation and especially shall not be used for personal gain or in such manner and with such application as would compromise the integrity and/or public image of the Corporation, its Directors, Managers and other employees and/or any of them.

5.3 Dealing with Clients, Suppliers and Others

All transactions must be authorised and handled in a manner compliant with GOJ Procurement Guidelines, FCJ's policies and the law.

Employees will not solicit or accept payoffs or “kickbacks” from clients, suppliers, contractors etc.

5.4 Acceptance of Gifts

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Employees may not accept any gift and/or favour other than advertising material and other normal public relations tokens, from any client or supplier of the Corporation or any prospective client or supplier of the Corporation without the express permission of his/her Manager.

Employees may not use their position for improper personal gain.

5.5 Misappropriation and other Improprieties

No employee shall convert to his or her own use and benefit, any funds or property which is not rightfully his or hers, nor knowingly assist another in such misappropriation. Information on suspected frauds, embezzlement or any other impropriety in connection with the Corporation's operations shall be promptly, truthfully and completely reported to management.

All employees will exercise due care to ensure that all personal business and the Corporation's transactions and dealings are undertaken in full compliance with the law, statutes, regulations, regulatory guidance, GOJ and FCJ policies and business practices which apply thereto from time to time.

Employees shall not utilize any part of funds provided to them by the Group by way of an approved staff loan or grant, in any manner or for any purpose other than that for which such staff loan or grant was made without prior approval of the Human Resources & Administration Manager and the Director of Finance. Employees will not commit the Corporation to any fiduciary, moral or financial obligation without the express authority to do so.

5.6 Confidentiality

Employees are prohibited from discussing the Corporation's security systems to include computer security systems, camera systems, etc with outsiders, and if weaknesses are observed within the Group's operations or computer systems, employees are expected to

bring such weaknesses to the attention of management. Employees are always required to preserve the confidentiality of communications and transactions between the Corporation and its clients, employees and stakeholders in accordance with relevant legal and policy requirements. This obligation continues even after the employee has left the Corporation.

Except as may be required for work from home arrangements (where preauthorization is had), furnishings, equipment, supplies, files or other information are not to be removed from the Corporation's premises without prior approval.

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Employees are prohibited from the unauthorised passing of internal business information to outside parties, including the media as well as the unauthorised making or issuing of public statements (written or oral) on behalf of or in identification with the Corporation. Any such information disclosure shall be in accordance with the Corporation's Communications Policy and procedures. This applies to all vehicles of communication (e.g. statements, speeches, letters or articles) and all communication media (e.g. newspapers, radio, television, email or the Internet). Care must be taken to avoid responding to questions about a matter where an investigation is pending or in process unless authorised to do so.

Unless designated as a spokesperson for the Corporation or otherwise authorised to speak to the media, all media enquiries are to be referred to the Marketing & Communications department.

5.7 Absence from Duty

Absence from duty due to illness or other emergencies must be communicated to the appropriate authority within the organisation as soon as possible, but no later than the end of the first day of absence.

Absence from duty for other reasons should be pre-arranged and authorised by the appropriate authority within the Department.

5.8 Deportment and Dress Code

Employees are expected to treat each other and those with whom they interact with respect at all times and to ensure that all interpersonal relationships are:

- Careful;
- Free from discrimination (including but not limited to discrimination in respect of race, gender or creed);
- Free from harassment and offensiveness, verbal and physical, including sexual harassment.

Employees are expected to adhere to the everyday guidelines of personal hygiene and good grooming and shall keep their surroundings clean, tidy and business like. For employees who are required to wear uniform in the performance of their duties, unless specifically exempted by management, the assigned uniform must be worn while at work each day.

Where the wearing of a uniform is not required, employees are expected to adhere to the Dress Code.

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All conversations and other communication with employees, clients, suppliers and stakeholders shall be conducted with utmost courtesy and decorum and with the appropriate use of courtesy titles.

Employees will refrain from conducting loud, lengthy or boisterous private conversations with each other in office or on the telephone, particularly in the presence or view of clients, suppliers, and stakeholders.

While on the job, employees shall not eat or drink in view of clients, suppliers and stakeholders or while attending to any member thereof except in circumstances where they are simultaneously being entertained. Employees will not smoke or chew gum while attending to any clients, suppliers and stakeholders. Employees will not whistle, sing, hum or initiate any other distracting noise including the loud playing of personal radios during business hours.

Employees shall not use mobile (cell) phones while dealing with clients unless the need for such use is to facilitate the processing of a particular business matter with the client.

5.9 Conflict of Interest

Employees owe their business loyalty to the Corporation. A “conflict of interest” exists when an employee’s personal interests are incompatible with those of the Corporation and/or may be likely to interfere or appear to interfere with the execution of the employee’s duties to the Corporation and/or the interests of the Corporation. Employees shall avoid situations in which any private interest could conflict with their duties to the Corporation and shall advise their Head of Department (HOD) of any unavoidable conflicts of interest as soon as they arise or are anticipated (whichever is earlier).

Employees shall avoid acquiring any business interest or participation in any business activity outside the Corporation which would tend to:

- create an excessive demand upon the time and attention of the employees and deprive the Corporation of the employee's best efforts on the job

OR

- create a conflict of interest.

Every employee of the Corporation is required to ensure that actions taken, and decisions made within his or her jurisdiction are free from the influences of any interests which might reasonably be regarded as conflicting with those of the Corporation. In instances where a potential conflict may occur employees are

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expected to declare these situations and seek to recuse themselves from the decision-making process.

The following are examples of conflict of interest scenarios and are forbidden:

- Conduct of personal business activity on the Corporation's time including any period during which the Corporation may set or assign business duties, tasks and responsibilities for its employees (from time to time) and may include periods and locations outside of regular business hours (without the prior approval of the HOD).
- Other employment.
- The soliciting of appointments as Executors, Administrators or Trustees.
- The conversion, diversion or ceding of the prescribed revenue accruing to the Corporation from the provision of any business accommodation.
- As a rule, employees should avoid conducting the Corporation's business with a relative or spouse or with a business in which a relative or spouse is associated in any significant role.

If such related party transaction is unavoidable, the employee must fully disclose the nature of the related party transaction to their HOD prior to undertaking the transaction.

The Corporation discourages the employment or transfer of relatives in positions or assignments within the same department and prohibits the employment of such individuals in positions that have a financial dependence or influence (e.g. supervisor/subordinate relationship).

Any employee who is aware of, or has a question concerning, a conflict of interest or has a question whether a conflict might develop, is obligated to promptly seek assistance to resolve the conflict or question.

5.10 Insider Information

Employees shall abide by the Law be mindful of the legal consequences of inappropriate use of insider information, including but not limited to internal estimates and other aspects of the procurement process. Insider information about the Corporation's affairs or those of clients shall not be used by employees for their own gain or for that of others.

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CODE OF ETHICS/ CONDUCT FOR FACTORIES CORPORATION OF JAMAICA

I _____ having entered the services of the Corporation do confirm that I have fully read and understood the meaning of its Code of Ethics/ Conduct and agree to conform to the stipulations contained therein.

SIGNED:

DATED:

WITNESSED:

NAME

OF

WITNESS:

I hereby acknowledge receipt of a copy of this Code of Business Conduct
