

	Title: Donation Policy	Revision #: 1
	Revision Date: February 12, 2025	Doc. ID: FCJ/EXE/P004
	Approved by: Board of Directors	Issue date: March 2023

1. INTRODUCTION

As an Agency that is called up on a regular basis to be a good corporate citizen, Factories Corporation of Jamaica Limited (FCJ) tries to assist as many individuals/groups as it can.

All Donations and Sponsorship provided by the Company must be compatible with FCJ's business philosophy and reflect its commitment to operating in an ethical manner. Donations and Sponsorship will not be given to organizations that the Company is in legal or financial conflict with or which connects the Company to any political party or group.

2. PURPOSE

As FCJ tries to enhance and improve the lives of its clients, we also recognise that residents in communities we serve or where our facilities are located should also be impacted. Organisations, especially those in close proximity to FCJ facilities, may apply for funding.

Donations are, however, not only limited to communities or individuals in close proximity to our facilities. As an agency of the Ministry of Economic Growth and Job Creation, FCJ prides itself on being the great facilitator. We therefore welcome all requests. Following a review of the application, the decision will be communicated to the applicant.

This policy is intended to guide the organisation in ensuring a transparent process for all donations and for all parties to be aware of the procedures and practices that govern the operation of FCJ donations.

3. DEFINITIONS

“Company” - All subsidiaries and affiliated companies.

“Donation” - A voluntary contribution in the form of monetary or non-monetary gifts to a fund or cause, for which no return service or payment is expected or made. Contributions to industry associations or fees for memberships in organizations that serve business interests, are not necessarily considered Donations.

“Employee” - For the purposes of this policy, this includes all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), trainees, seconded staff, casual workers and agency staff, interns, or any other person associated with us, or any of our subsidiaries or joint ventures or their employees, wherever they are located.

“Sponsorship” - Partnering with external organizations to deliver mutual benefits through an exchange of monies, products, services, content or other intellectual property.

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“Third Party” - Any individual or organization that comes in contact with FCJ during their course of work for the organization. This includes actual and potential customers, suppliers, business contacts, intermediaries, government and public bodies, including their advisors, representatives and officials, politicians and political parties.

4. **POLICY**

- 4.1 Provisions for donations must be included in the company’s Annual Budget and all donations shall be subject to the availability of funds.
- 4.2 Charitable donations by the Company may only be made where:
 - the donation is made in compliance with applicable laws;
 - the donation is not made to secure an improper business advantage; and
 - the donation is made to a properly established charity and there is a valid charitable purpose for the donation.
- 4.3 Promotional expenditure should seek to improve the image of the Company as a commercial organisation, to better present its products or services or establish cordial relations. The provision of promotional items such as T-shirts, calendars, pens and other such similar items of modest value is permissible. Any other promotional expenditure (including Sponsorship) must be reasonable and proportionate and the prior approval from the duly authorized Executive of the Company must be obtained.
- 4.4 The organisation may, from time to time, receive requests for the purchase of tickets from staff members or other groups for fund-raising events. No more than ten (10) tickets or tickets with a maximum value of \$5,000.00 each will be approved at any one time. These requests will be considered based on the value to be added to FCJ, the cost of the tickets and the availability of funds at that point in time.
- 4.5 FCJ will consider applications for support from organisations/projects that fall within the scope outlines below:
 - priority will be given to projects from surrounding communities that FCJ properties are located.
 - all requests in excess of Fifty Thousand Dollars (\$50,000.00) must be from a non-profit organisation that is registered as a charitable organisation or from a school.
 - applicants are required to provide a background of the project, the amount requested, the purpose, the target area and the impact the project will have on the community.

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- 4.6 No offers of Sponsorship shall be provided without the prior written consent of the duly authorized Executive of Company and any use of the Company trademarks must be referred for approval.
- 4.7 All donations below Two Hundred and Fifty Thousand Dollars (\$250,000.00) will be approved by the Managing Director, through the Donations Committee. All donations above Two Hundred and Fifty Thousand Dollars (\$250,000.00) will be reviewed and where applicable, recommended by the Public Relations & Marketing Committee and submitted to the Board for approval.
- 4.8 No Employee in or relating to the course of his/her employment, shall make any payment or other contribution to any political party, political office holder or candidate.
- 4.9 Donations or Sponsorship must not be made or offered in conjunction with, as part of or in relation to any bid, tender, contract renewal or prospective business relationship.
- 4.10 The Company will not enter into any charitable Donation or Sponsorship agreement with an organization as a means of gaining favourable terms from that organization or its affiliates/connected parties in any other business agreements.
- 4.11 FCJ should ensure that any Donation or Sponsorship is compatible with the Company's values and ethical policies such as the Anti-Bribery & Corruption policy.
- 4.12 A record of all Donations and Sponsorships should be maintained for audit purposes.
- 4.13 Any Employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.
- 4.14 All Employees have the responsibility to read, understand and comply with this policy. You should at all times, avoid any activity that might lead to, or suggest, a breach of this policy.
- 4.15 This policy should be read in conjunction with the Company's Code of Ethics.
- 4.16 Employees are encouraged to raise concerns about any instance, or suspicion, of malpractice at the earliest possible stage through their line manager or other available reporting mechanisms

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5. GOVERNANCE

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

6. MONITORING AND REVIEW

6.1 The Company will establish and put in place appropriate performance measures and reporting

systems to monitor performance against metrics and compliance with the relevant policies, procedures and controls.

6.2 The Public Relations Committee of the Board of Directors will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible.

6.3 Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective. FCJ's Internal Auditor will report to the Managing Director at least annually on the application of this policy.

7. PROCEDURE

1. Organisation/individual would submit a request for donation/sponsorship.

- All requests, to include a background of the project, the amount requested, the purpose, the target area and the impact the project will have on the community must be submitted in writing on the relevant organisation letterhead and duly signed.
- Only one donation will be granted per project, organisation or individual per annum.
- All applicants should receive a response within 15 working days.

2. Applications for donation/sponsorship must be made through the Marketing and Communications Department Head and will be evaluated as follows:

Applicant
Marketing and Communications Manager

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a) The application is reviewed

b) Submission is made to the Managing Director Marketing and Communications Manager

c) Approval/Rejection (for application below \$250,000.00) Managing Director

(d) Approval/Rejection (for applications above \$250,000.00) Public Relations and Marketing Committee/Board of Directors

DOCUMENT CONTROL:

REVISION HISTORY

Version	Description	Reviewed by	Date Reviewed
1	No amendments/adjustments made	Corporate Governance Committee	March 2021
2	Reviewed and amended	Corporate Governance Committee	March 15, 2023
3	Policy reviewed. No changes recommended.	Corporate Governance Committee	February 12, 2025

APPROVAL HISTORY

Version	Approved by	Date Approved	Date Effective
1	Board of Directors	June 13, 2019	June 13, 2019
2	Board of Directors	March 30, 2023	March 30, 2023
3	Board of Directors	May 1, 2025	May 1, 2025