WIGTON ENERGY LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY

JANUARY, 2025

1. Policy Statement

Wigton Energy Limited ("Wigton" or the "Company") is committed to ensuring that its business undertakings are conducted in an ethical manner and facilitate a positive social and environmental impact on our stakeholders. It is in this regard that the Board of Directors of Wigton has approved the Corporate Social Responsibility Policy (hereinafter referred to as "the Policy").

2. Scope

The provisions of this Policy shall apply to all directors, officers and employees of the Company. The Company also encourages all stakeholders and suppliers to act in accordance with this Policy's provisions where it is reasonably possible to do so.

3. Overview of Policy

Wigton will:

- Comply with all relevant acts, regulations and guidelines that govern the Company and its operations;
- Honour all its internal policies and procedures;
- Ensure that all business operations are legitimate, open and transparent;
- Ensure that it maintains a work environment which complies with best practices in relation to the safety of its employees and visitors;
- Maintain positive stakeholder relations;
- Provide support and engage in volunteerism in the best interest of its stakeholders; and
- Continue to contribute and play an important role in the transition towards a sustainable planet.

4. Relations with Stakeholders

Wigton will continue to build strong relations with its stakeholders by providing them with a range of opportunities and mediums through which they can express their interests and concerns. All parties are dealt with honestly and fairly and the Company will endeavour to maintain transparency and accountability in all its relations.

As a major corporate player in the renewable energy industry, Wigton also aims to establish membership in corporate and industry related organizations and is currently a member of a number of organizations committed to the promotion of corporate best practices and ethical considerations.

5. Employee Wellbeing and Development

Wigton treats all its employees with dignity, fairness and respect and actively invests in the learning and development of its employees.

As the Company will not compromise the health and safety of its employees, Wigton strives to promote a work environment that encourages safety, diversity and inclusion. The importance of a healthy work-life balance is also recognised and employees are encouraged to maintain healthy lifestyle practices with emphasis on healthy eating, fitness and stress management.

In keeping with the foregoing, Wigton offers a substantial range of employee benefits and initiatives which are outlined in our Human Resource Manual and other relevant policies and documentation.

6. Data Privacy

Protecting the privacy of our stakeholders', employees' and suppliers' data is critical to maintaining their trust, and to this end, we make every effort and precaution to safeguard their personal and

sensitive information. We commit to ensuring that all efforts are expended on data security and proper information management.

To achieve this, Wigton commits to:

- Ensuring that any personal/sensitive data collected shall be used, stored and otherwise processed within the framework of responsible, efficient and effective business management; and
- Managing our stakeholders' and employees' data in accordance with all applicable regulatory standards, and principles outlined by governing bodies.

7. Sponsorships and Donations

Wigton is committed to being a good corporate citizen and is mindful of its responsibility to give back to the community in which it operates. Wigton is also committed to operating in an environmentally sustainable manner and places a high priority on environmental stewardship to help create a more sustainable future. To this end, the primary areas of focus for contribution are environmental protection/preservation and environmental sustainability, to include, climate change mitigation, green building and sustainable infrastructure/transportation as well as education and environmental advocacy, youth development and community development in so far as they align with this primary areas of focus. It is believed that the Company's impact will be greatest if the areas and causes supported are highly selective.

A sponsorship is regarded as support to any individual, entity, organization, programme or event which is granted to promote Wigton's image and bolster the awareness and corporate goodwill of Wigton. Donations on the other hand include fundraiser contributions and grants in cash or kind to individuals and charitable entities, organizations, programmes and events.

(a) <u>Sponsorship and Donation Objectives</u>

Wigton's sponsorship and donations must always fulfil one or more of the following objectives:

(i) Foster environmental stewardship and empower individuals to take action;
(ii) Support climate change mitigation efforts, such as energy efficiency, energy conservation and/or carbon offsetting;
(iii) Promote environmental preservation and sustainability as well as the reduction of the impact of society on the natural environment;
(iv) Connect with target audiences;
(v) Raise public awareness about Wigton;
(vi) Bolster Wigton as a good corporate citizen;
(vii) Promote positive attitudes and behaviours regarding Wigton;
(viii) Provide access to key target groups, particularly those that might not necessarily be reached through traditional mass media campaigns;
(ix) Develop and/or reinforce positive relationships with key stakeholders;
(x) Facilitate professional and personal development for employees through participation in various sponsorship and donation related activities;
(xi) Support the communities in which Wigton operates.

In instances where a request may not necessarily be directly aligned with the areas of focus and the above sponsorship and donation objectives, same may be considered and assessed based on its anticipated impact or significance. In such circumstances, the Chief Executive Officer, Deputy Chief Executive Officer or the Board of Directors, as the case may be, may grant approval of the sponsorship or donation request.

(b) Eligibility

Individuals, entities, organizations, programmes or events which are in line with our values, areas of focus, have a high market reach and which provide benefits that may be leveraged in the Company's marketing initiatives and business relationships will be eligible for sponsorship.

Donations will be made to individuals and charitable entities, organizations, programmes or events which are not inimical to Wigton and which, in many respects, represent the sphere of Wigton's business operations, are within the areas of focus and allow for the Company to derive corporate goodwill.

Wigton will not sponsor or provide donations to individuals, entities, organizations, programmes or events which do not possess a positive track record, have no experience in delivering value to sponsorship partners, and do not allow sufficient time for the assessment and evaluation of sponsorship or donation requests. Wigton will not provide sponsorship or donations where the strictures and practices of good governance will be contravened, the core values, strategic direction and brand attributes of Wigton will not be positively reflected or where there is a reputational risk or a conflict of interest for Wigton.

(c) Evaluation of Sponsorship or Donation Requests

All sponsorship and donation requests, regardless of their point of origination within Wigton, should be submitted to the Deputy Chief Executive Officer with a copy to the Human Resources Officer in writing via hard copy or electronic means. The sponsorship or donation request will then be evaluated by at least three (3) persons and a recommendation submitted to the Chief Executive Officer or Deputy Chief Executive Officer having regard to the value of the sponsorship or donation for a determination as to whether the sponsorship or donation may be fulfilled having earned a score of not less than 75% in the evaluation, passed the risk assessment and being within the current resources or budgetary allocation of the Company.

8. Environmental Sustainability

Wigton's business interacts directly with the natural environment. As a key player in the renewable energy industry, Wigton operates and promotes clean energy generation. The Company is, therefore, committed and driven to utilising natural resources sustainably and continues to seek ways in which it can further reduce Jamaica's carbon footprint.

Wigton also measures any impact its operations may have on the environment and consistently complies with all applicable environmental laws, permits and guidelines.

9. Policy Owner

The Chief Executive Officer is responsible for the implementation, monitoring and compliance with this Policy.

10. Policy Review

This Policy shall be reviewed at least every three (3) years by the Corporate Governance Committee, or as regularly as is required, for the purpose of updating the Policy to reflect changes in best practices and to enhance its effectiveness. Any amendments to the provisions of this Policy must be submitted to the Board of Directors for consideration and approval.

DOCUMENT CONTROL

Version	*Date*	*Date Approved by Board*	*Area Changes made*
1	November 10, 2021	November 10, 2021	N/A
2	January, 2025	January 30, 2025	• Updated the Policy Statement; • New Clause 6 on Data Privacy added; and • Updated Clause 7 and the Sponsorship Evaluation Form to remove focus in the areas of crime prevention and sports and to emphasize environmental protection, preservation and sustainability.

SPONSORSHIP EVALUATION FORM

Name of the individual/organisation requiring support:

Amount requested:

Nature of request:

ORGANISATIONAL DONATION/SPONSORSHIP OBJECTIVES MET (25)		
Fostering environmental stewardship and empowering individuals to take action; supporting climate change mitigation efforts, such as energy efficiency, energy conservation and/or carbon offsetting; and/or promoting environmental preservation and sustainability as well as the reduction of the impact of society on the natural environment (10)		
Raising public awareness about Wigton and/or renewable energy issues (5)		
Improving Community Relations (5)		
Developing and/or reinforcing positive relationships with key stakeholders (5)		
	Subtotal (25)	
DONATION/SPONSORSHIP CRITERIA MET (25)		
Will engender public goodwill for Wigton and its work (5)		
Will build or strengthen relations with key stakeholder/s, partner/s or supporter/s (5)		
Will provide access or visibility to critical target group/s (5)		
Will position Wigton as a good corporate citizen (5)		
Will highlight the role and work of Wigton (5)		
	Subtotal (25)	
AREA OF FOCUS (At least One (1) must be identified by a ✓)		
Environmental Protection/Preservation and Environmental Sustainability		
Education and Environmental Advocacy		
Youth Development		
Community Development		
	GRAND TOTAL (50)	

Evaluations below seventy-five percent (75%) and/or in respect of which no area of focus has been identified should not be recommended for approval.

Risk Mitigation: Please select all that apply.

This donation/sponsorship will:

- ❑ Contravene the strictures and practices of good corporate governance or Wigton's Company policies and procedures;
- ❑ Fail to reflect the core values, strategic direction and brand attributes of Wigton;
- ❑ Present a reputational risk; or
- ❑ be considered a conflict of interest for Wigton.

Recommendation: ❑ Approved ❑ Declined

Conflict of Interest Declaration by Evaluators

By signing below, I declare that I have not accepted any financial reward or other form of inducement with respect to any of my dealings in relation to this Sponsorship/Donation and I am not in any way connected with or have any actual or potential conflict of interest with the individual/s or entity/s requesting this sponsorship/donation nor am I involved with the execution of any of the initiatives, events or activities to be undertaken in relation to this sponsorship/donation.

Evaluated by:

Name	**Signature**	**Date**