

# *WHISTLEBLOWING & PROTECTED DISCLOSURES POLICY*

Flash Motors Company Limited

5-7 Orchard Road  
Kingston 5,  
St. Andrew,  
Jamaica  
[info@flash-motor.com](mailto:info@flash-motor.com)  
[www.flash-motors.com](http://www.flash-motors.com)



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Flash Motors Company Limited (“Flash” or “the Company”) is committed to maintaining a culture of integrity, transparency, and accountability. This Policy provides a safe, confidential mechanism for employees, contractors, suppliers, and members of the public to report suspected wrongdoing without fear of retaliation.

This Policy provides a safe, confidential mechanism for reporting suspected:

- Fraud, corruption, or bribery;
- Serious legal or regulatory breaches;
- Environmental or safety violations;
- Human rights or labour violations;
- Supplier or contractor misconduct;
- Serious breaches of internal policies;
- Attempts to conceal wrongdoing.

## 1. Reporting Channels

- **Primary Reporting Authority:** Chief Executive Officer (CEO)
- **Secondary Reporting Authority:** Chief Financial Officer (CFO) (if the CEO is implicated or unavailable)
- Additional options may include:
  - Designated whistleblowing email
  - Locked complaint/whistleblowing box
  - Anonymous reporting forms (where available)
  - External reporting to regulators under applicable laws, including the *Protected Disclosures Act, 2011 (Jamaica)*.

## 2. Protection of Whistleblowers

- No person who makes a report in **good faith** will be subjected to:
  - Dismissal, suspension, or demotion;
  - Threats or intimidation;
  - Harassment or victimisation;
  - Adverse changes in duties or opportunities.
- Confidentiality of whistleblowers will be maintained to the maximum extent possible.
- Anonymous reports are permitted and will be assessed and investigated as appropriate.

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### 3. Malicious or False Reporting

- Intentionally false or malicious reports undermine the system and may result in disciplinary action.
- However, honest reports made in good faith will not be penalised, even if concerns are later found to be unsubstantiated.

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