



## JP TROPICAL GROUP

### SOCIAL MEDIA POLICY

At JP, our values as embodied in the JP Way and our Group Code of Ethics and Business Conduct, are at the foundation of all of our Group's policies and guidelines and they guide the conduct of our Team at every level.

#### 1. Introduction

This Policy is meant to provide general guidelines to our team at JP Tropical Group (the 'Company' or the 'Group' which includes JP Farms, JP Snacks and Tortuga) for their professional and personal use of social media.

Note that violations of this policy will be enforced under current employee personnel policies.

#### 2. Definition

'Social Media' as interpreted by this policy includes, but is not limited to, all forms of online publishing and discussion, including but not limited to blogs, wikis, file sharing, social networks and other social networking applications.

#### 3. Guidelines for Personal Use of Social Media

Whether or not you are an official Social Media Manager, when you are talking about any company, business or brand in the Group or associated with the Group using your personal social media account, keep in mind that:

1. The Company's Code of Ethics and Business Conduct, the Securities Trading Policy and other relevant policies still apply.
2. You are responsible for your actions. We respect your right to express yourself and we encourage you to get online and have fun but be responsible, use sound judgement and common sense.
3. Your personal social media content should be consistent with how you wish to present yourself with clients and colleagues.
4. As a team member of Company, you are an important ambassador for your company's brands. We encourage you to promote them, but you should make it clear that the content of your post is personal to you and that you are not acting as an agent of the company.
5. You should never disclose commercially sensitive, anti-competitive, private or confidential information on personal and work-time social



media sites. In cases where you are unsure whether the information you wish to share falls within one of these categories, you should discuss this with the Company's General Counsel.

6. You should not post negative comments or opinions in relation to the Group or any of our brands or products on your personal or Company social media accounts.
7. If you are not a Social Media Manager or otherwise authorized to comment on social media on behalf of the Company, or to use Company social media accounts, you should refrain from answering questions related to the company, its brands or products. Instead, you should direct all questions and concerns to the appropriate Social Media Manger.
8. Be responsible when mixing your business and personal lives; be aware of, and ensure compliance with, your Business Unit's policy regarding the use of social media during work hours, or on the company's devices.

#### **4. Guidelines for Social Media Managers**

Social Media Managers for the purpose of this policy are those authorized to access and manage the group's social media accounts as well as to communicate with the general public via the group's social media accounts. When acting as an official spokesperson for your Business Unit, take into consideration the following:

1. While engaging in work-time social media sites, always be transparent.
2. Follow all applicable Company policies including but not limited to the Code of Ethics and Business Conduct.
3. Proper judgement and rational thinking should be utilised when publishing content on personal and work time social media sites. As such all material posted on social media shall not be inappropriate or harmful to the company, its employees or customers. For example, content that includes commentary or images that are defamatory, prejudicial, pornographic, harassing, libellous, or that can create a hostile work environment is prohibited.
4. Do not conduct discussions or comment on legal matters relating to the Company unless you have been given explicit authorization to do so.
5. Permission must be granted from clients, partners or suppliers before using their third-party copyrights, trademarks or other intellectual property on social media.
6. Misuse of social media websites can, in certain circumstances, constitute a criminal offence or otherwise give rise to legal liability against you and the company. As such, the policy shall be read with all applicable and relevant law.
7. Social Media Managers should ensure that the Company's social media usernames, emails and passwords are secure. This information should not be shared with or made accessible to unauthorized team members or the general public.



8. Social Media Managers in consultation with the General Manager of their Business Unit should prepare a script or detailed guidelines, to direct and streamline responses to the various categories of social media comments and queries.
9. Keep in mind that your local posts can have global significance. Keep this 'world view' in mind when participating in online conversations.
10. When in doubt, do not post.
11. Remember, anything you post is permanent.

## 5. Social Media Crisis Management Policy

**Definition:** A 'Social Media Crisis' is defined as an event that can have a negative effect on a brand, individual or company which originates on a single or multiple social media channel(s).

**Application:** The objective of this document is to ensure the social media teams are adequately prepared to deal with a crisis that may arise within the Social Media environment. Crises range from small-scale incidents to larger widespread public relations incidents. Team Members who are not Social Media Managers should bring any matter falling under this policy to the attention of the relevant Social Media Manager. Only Social Media Managers should respond to Social Media Crises. Social Media Managers should never act alone in responding to a crisis, rather they should act in consultation with the contact teams set out below depending on the level of the threat (collectively referred to as the Crisis Response Team).

### Step 1: Identify Threat Level

- **Level 1:** Minor incident, normally limited to one Social Media platform (e.g. Consumer post dissatisfaction with a service or good).
- **Level 2:** Incident that spreads across several Social Media platforms (e.g. Video of an employee being unprofessional or rude with a customer).
- **Level 3:** Incident immediately goes viral and could greatly negatively affect the company's brand. (e.g. Proof of criminal activity by an employee)

**Step 2: Acknowledge the Crisis** within an hour and re-assure Social Media users that the crisis is being resolved or further investigations will be conducted to aid in solving the issue at hand. Further resolution should be addressed through a direct message or some other private channel outside of the public eye.

For Level 2 and 3 incidents, **pause all other Social Media communication** until the crisis has been averted. This includes, but is not limited to promotions, notices, ongoing conversations, posting, commenting and liking. Consider whether external posts to the Company's social media accounts should be blocked or hidden.

**Step 3: Determine the Communication Team** – based on the level of the crisis, the Social Media Manager should contact the appropriate level of

administration to address the crisis as soon as possible (customer service, management, executives, human resources). A list of the individuals to contact at each crisis threat level can be found below in the appendix. Key stakeholders should also be contacted within 3-6 hours of the crisis to communicate that the crisis has been acknowledged and is currently being investigated and resolved in a timely manner.

**Step 4: Release an Official Statement** – Given the fast pace nature of social media an official response within real time will be required in most situations. If the Crisis Response Team decides to give an official response, the official response should be formulated and circulated within 24 hours of the crisis. The response should be positive, rational, politically correct and explicit, and seek to deescalate the situation and be factually accurate. The response should reiterate the crisis, include an apology where appropriate, and provide a solution/compensation for the affected parties as well as the general public. **Inaction is never an acceptable response.** Be reminded that inaction can allow the public to take over the narrative, fuel the negativity and add to the misinformation. The following action should be taken in respect of each crisis level:

- **Level 1-** A direct reply should be given to the query or concern.
- **Level 2-** An official statement should be posted on the social media platform.

- **Level 3-** An official statement should be given across all social media platforms, broader media channels and to team members in the relevant Business Unit.

**Step 5: Post-Statement Monitoring and Communications** – Monitor the crisis continually after the official response to determine the reactions of the general public. Also, address any questions or concerns that arise post-response, which may or may not have been spoken to in the official statement. Following the crisis, the team should document lessons and takeaways from the crisis and put in place measures to ensure that the crisis does not re-occur.

In respect of Level 3 crises, the Crisis Response Team should develop and circulate details and FAQs pertaining to the crisis throughout the organization. This is to ensure awareness and consistency in the Company's understanding of the crisis, as well as the message that team members should give the general public after the statement.

## 6. Contact List for Various Crisis Threat Levels

Business Unit	Contact Name	Title	Phone No.(s)	Email
<b>Level 1- Tortuga</b> 	Yanique McAlpin	Digital Marketing & E-Commerce Manager	876-553-1460	YMcalpin@tortugarums.com
	Natalia Garcia	Senior Marketing and Business Development Manager	305-467-6944	NGarcia@tortugainports.com
<b>Level 1 – JP Farms</b> 	Gayon Douglas	JP Tropical Foods Marketing Executive (Fresh Category)	876-383-2123	GDouglas@jpbjamaica.com
<b>Level 1- JP Snacks</b> 	Erin Mitchell	JP Snacks Marketing Manager	876-279-7763	EMitchell@jptropical.com
<b>Level 2- Tortuga</b> 	All Level 1 Contacts above			
	Marcus Simmonds	Tortuga CEO	345-925-2120	MSimmonds@tortugarums.com
<b>Level 2- JP Farms</b> 	Level 1 Contact above			
	Mario Figueroa	JP Farms Manager	876-284-7204	MFigueroa@jpbjamaica.com
<b>Level 2 – JP Snacks</b> 	Level 1 Contact above			
	Benjamin Valdez	JP Snacks General Manger	829-760-3033	BValdez@jptropical.com
<b>Level 3-</b>   	All Level 1 and 2 contacts above (for each respective brand)			
	Maya Johnston	JPG Chief Commercial Officer	876-816-2445	MJohnston@jpbjamaica.com
	Simone Pearson	JPG General Counsel / Corporate Secretary	876-399-1876	SPearson@jpbjamaica.com
	Jeffrey Hall	JPG CEO	876-382-7663	JHall@jpbjamaica.com



BY ORDER OF THE BOARD



Chairman

C. H. Johnston

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