# Cable Bahamas Ltd. Whistleblower Policy

Cable Bahamas Ltd.'s Code of Conduct (Code) requires directors, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Company, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Cable Bahamas Ltd. aspires to create a culture that eliminates the need for a whistleblower policy. However, if employees or others suspect a violation, this policy lays out the appropriate channels for reporting concerns. All reports of suspected violations made under this Policy will be taken seriously and addressed promptly. **This Policy is designed to:** 

- Support the Company's values.
- Ensure employees can raise concerns without fear of suffering retribution; and
- Provide a transparent and confidential process for dealing with concerns.

A Whistleblower as defined by this policy is someone who reports an activity that he/she considers to be illegal or dishonest. The Whistleblower is not responsible for investigating the activity or for determining fault or corrective measures.

Suspected violations, may include but are not limited to:

 Concerns or complaints regarding possible improprieties in matters of financial reporting, fraud, corruption, bribery or blackmail, criminal offences, discrimination, harassment, theft or improper use of company property, alleged retaliation, failure to disclose conflict of interest, failure to comply with a legal or regulatory obligation, miscarriage of justice, endangering the health or safety of an individual, and concealment of any of the above in relation to the Company.

# **Reporting Responsibility**

It is the responsibility of all directors, officers, and employees to comply with the Code and to report violations or suspected violations in accordance with this Whistleblower Policy.

#### No Retaliation

No director, officer, or employee who in good faith reports a violation of the Code shall suffer harassment, retaliation, or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. The right of a Whistleblower to protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the Company prior to seeking resolution outside the Company.

# **Reporting Violations**

Cable Bahamas Ltd. has an open-door policy and encourages employees to share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if the employee is not comfortable speaking with their supervisor or not satisfied with their supervisor's response, the employee is encouraged to speak with the Vice President of the Human Resources Department. Supervisors and managers are required to report suspected violations of the Code of Conduct to the Vice President of Human Resources, who has specific and exclusive responsibility to investigate all reported violations. In instances where the employee is uncomfortable with following the Company's open-door policy, a report can be made directly to the Company's Corporate Governance Committee via email at <a href="https://cblgroup.ethicaladvocate.com">https://cblgroup.ethicaladvocate.com</a> or an anonymous report made through the Whistleblower hotline at 1-888-528-0638. Reports made via the hotline are received by the third-party operating the hotline and delivered directly to the Nominating & Corporate Governance Committee Chairperson.

# **Reporting Guidance**

A Whistleblower is encouraged to provide as much information as possible to assist in the investigation. For example, name(s) involved; date or estimated time period, nature of the concern, and description of the action or inaction; how the Whistleblower learned of the information; witnesses; and any other information or documentation that supports the report. This is particularly important when allegations are reported anonymously, as follow-up is not possible.

## **Nominating & Corporate Governance Committee**

The Company's Nominating & Corporate Governance Committee is responsible for receiving and routing complaints of alleged wrongdoing to the appropriate Executive Officer and or Board Committee for investigation and resolution. Where appropriate, the Nominating & Corporate Governance Committee will conduct investigations and seek to resolve complaints and allegations concerning violations of the Code and, at its discretion, shall advise the Board of Directors.

### **Accounting and Auditing Matters**

The Audit & Risk Committee of the board of directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Committee shall immediately notify the audit committee of any such complaint and work with the committee until the matter is resolved.

### **Acting in Good Faith**

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

# Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. As far as possible, the confidentiality of the Whistleblower will be maintained. However, the Whistleblower's identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense.

## **Handling of Reported Violations**

The Nominating & Corporate Governance Committee will notify the sender and acknowledge receipt of the reported violation or suspected violation within five(5) business days. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.