ANTI-RETALIATION POLICY

1. Our Commitment

At Coronation Life Assurance ("the Company"), we are committed to maintaining a culture of integrity, transparency, and accountability.

We encourage everyone, Employees, agents, brokers, vendors, customers, and partners—to speak up without fear when they observe or suspect misconduct.

Management Commitment

The Company's leadership is fully committed to:

- Providing a safe and supportive environment for raising concerns
- Ensuring that all concerns are treated seriously, fairly, and confidentially
- Enforcing a zero-tolerance stance on retaliation

We strictly prohibit any form of retaliation against individuals who raise concerns or participate in investigations in good faith.

2. Who is Protected?

This Policy applies to all individuals connected to the Company, including:

- Employees (permanent, contract, and temporary)
- Directors and management
- Agents and brokers
- Vendors, consultants, and service providers
- Customers and members of the public

3. When Are You Protected?

You are protected under this Policy if you act in good faith

- Reporting a concern or suspected misconduct
- Providing information or evidence
- Participating in an investigation, audit, or review
- Asking questions about compliance, ethics, or Company policies
- Refusing to engage in wrongdoing

You remain protected even if your concern is not substantiated, provided it was raised honestly.

4. What is Retaliation?

Retaliation refers to any negative or unfair action taken against a person because they raised a concern, asked a question, or participated in a compliance or investigation process.

This applies to everyone we work with—employees, agents, brokers, vendors, partners, customers, and directors.

Examples of Retaliation

A. Workplace Retaliation (Employees & Staff)

You may be experiencing retaliation if, after speaking up:

- You are dismissed, demoted, or unfairly disciplined
- Your salary, benefits, or responsibilities are reduced without justification
- You are threatened, intimidated, or harassed
- You are treated differently from others without valid reason.

B. Subtle or Indirect Retaliation (All Stakeholders)

Retaliation is not always obvious. It can include:

- Being excluded from meetings, decisions, or key communications
- Being deliberately ignored or isolated
- Not being given information needed to perform your role
- Being reassigned unfairly without clear justification

C. Business or Third-Party Retaliation (Agents, Brokers, Vendors, Partners)

Retaliation can also occur in business relationships:

- Unjustified termination of contracts or agency relationships
- Deliberate withholding of commissions or business opportunities
- Unfair or discriminatory treatment compared to others

5. What is Not Retaliation?

Not every negative action is retaliation. The following may be legitimate when properly justified:

- Performance management actions based on objective and documented evidence

- Disciplinary actions for actual misconduct or policy breaches
- Business decisions made for valid operational or commercial reasons, unrelated to any reported concern

6. Good Faith Reporting

This Policy protects individuals who raise concerns in good faith.

You are protected if you:

- Report honestly and sincerely
- Have a reasonable belief that the information provided is accurate
- Raise concerns even if they are later not substantiated

It should be noted that

This Policy does NOT protect:

- Reports made maliciously or with intent to harm
- Knowingly false or misleading information
- Abuse or misuse of the speak-up process

7. How to Report Retaliation

If you experience or observe retaliation, you are encouraged to report it promptly through any of the Company's speak-up channels.
For detailed guidance, please refer to the **Company's Whistleblowing Policy**.

8. What Happens After a Report is Made?

All reports are handled with seriousness and professionalism. The Company will:

- Maintain confidentiality to the extent possible
- Conduct a fair, objective, and independent investigation
- Take appropriate corrective and disciplinary actions where necessary

9. Confidentiality and Data Protection

We are committed to protecting your privacy:

- Your identity will be kept confidential, where possible
- Information will be shared strictly on a need-to-know basis
- All personal data will be handled in compliance with the Nigeria Data Protection Act (NDPA) Guidelines

10. Consequences of Retaliation

Any individual found to have engaged in retaliation will be subject to disciplinary action, which may include:

- Termination of employment or contract
- Suspension or other internal sanctions
- Termination of business relationships
- Regulatory or legal action, where applicable

11. Roles and Responsibilities

Management

- Promote a **speak-up culture** across the organization
- Ensure concerns are handled **fairly and promptly**
- Prevent, detect, and address retaliation

All Employees and Stakeholders

- Speak up in good faith
- Report any form of retaliation
- Support and uphold a culture of integrity

12. Contact Us

If you have any questions or wish to report a concern, you are encouraged to use any of the confidential speak-up channels below. All reports will be handled with strict confidentiality.

📧 **Email:** kpmgethicsline@ng.kpmg.com

📞 **Hotline:** (MTN Toll-Free): 0703-000-0026
(All Networks): 08001235276, 08001235764

🌐 **Website:** https://apps.ng.kpmg.com/ethics/#