

WHISTLEBLOWING POLICY

1. Our Commitment

At Coronation Insurance Plc (“the Company”), we are committed to the highest standards of integrity, transparency, and ethical conduct.

We encourage all employees, customers, partners, and stakeholders to speak up if they observe any misconduct, unethical behavior, or regulatory breaches.

We are committed to:

- Providing safe and confidential reporting channels
- Treating all reports seriously and fairly
- Protecting whistleblowers from retaliation
- Ensuring appropriate action is taken where misconduct is confirmed

2. What is Whistleblowing?

Whistleblowing is the act of reporting suspected wrongdoing, misconduct, or unethical behavior within the Company.

This Policy forms part of our Compliance and Ethics Framework, in line with regulatory requirements and global best practices.

3. Who Can Report?

This policy applies to:

- Employees (permanent, contract, or temporary)
- Directors and management
- Agents, brokers, and vendors
- Customers and members of the public

4. What Can Be Reported?

You are encouraged to report any concerns, including but not limited to:

- Fraud, theft, or financial misconduct
- Corruption, bribery, or unethical practices
- Money laundering or terrorism financing activities
- Regulatory or legal violations
- Data privacy breaches
- Conflicts of interest
- Workplace harassment, Bullying or abuse
- Health and safety violations
- Any conduct that may harm the Company or its stakeholders

5. How to Report a Concern

You may report concerns through any of the following channels:

Whistleblowing Hotline:

 Email

Online Portal / App

Internal Reporting

You may also report to:

- Compliance Unit
- Internal Audit
- Your Line Manager

You may choose to:

- Report **anonymously**, or
- Disclose your identity (which will be treated confidentially)

6. What Information Should You Provide?

To help us investigate effectively, please provide:

- A clear description of the concern
- Date, time, and location of the incident
- Names of individuals involved (if known)
- Any supporting evidence or documentation

You are encouraged to report in **good faith**, even if you do not have all the details.

7. What Happens After You Report?

All reports are handled confidentially and in line with established procedures:

- Your report will be logged and reviewed promptly
- **A risk-based assessment** will be conducted
- Where necessary, an independent investigation will be carried out
- Appropriate corrective or disciplinary actions will be taken

Where possible, feedback may be provided, subject to legal and confidentiality constraints.

8. Confidentiality and Data Protection

We are committed to protecting your privacy:

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

9. Protection Against Retaliation

The Company strictly prohibits retaliation against anyone who raises a concern in good faith.

Retaliation includes:

- Dismissal or demotion
- Harassment or intimidation
- Discrimination or unfair treatment

Any act of retaliation will result in **disciplinary action**.

10. Fair Treatment

All individuals mentioned in a report will be treated fairly:

- Investigations will be conducted objectively
- Individuals are presumed innocent until proven otherwise
- The right to respond to allegations will be respected

11. External Reporting

Where necessary, concerns may also be reported to relevant authorities such as:

- National Insurance Commission (NAICOM)
- Nigeria Data Protection Commission (NDPC)
- Nigerian Financial Intelligence Unit (NFIU)
- Law enforcement agencies

12. Our Commitment to Continuous Improvement

We continuously monitor and improve our whistleblowing framework by:

- Tracking trends and resolution timelines
- Reviewing the effectiveness of reporting channels
- Updating this Policy in line with regulatory and business changes

13. Contact Us

For further information or to raise a concern, please contact:

✉ Email: kpmgethicsline@ng.kpmg.com

☎ Hotline:

On Network Toll Free (MTN)

✦ 0703-000-0026

ii. All-Network Toll Free

✦ 08001235276

✦ 08001235764

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

