

WHISTLEBLOWING POLICY

1.0 Our Commitment

At Coronation Life Assurance ("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

2.0 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.

3.0 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 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 any form of retaliation against individuals who raise concerns or report suspected misconduct in good faith.

9.1 What is Retaliation?

Retaliation refers to any negative action taken against an individual because they reported a concern, raised a complaint, or participated in an investigation.

Retaliation may include, but is not limited to:

- Dismissal or unjustified demotion (e.g., reducing someone's role or rank without valid reason after they raise a concern)
- Harassment, victimization, or intimidation
- Discrimination or any form of unfair treatment
- Denial of opportunities, benefits, or career progression
- Threats or any action intended to discourage speaking up

Any employee or stakeholder found to have engaged in retaliatory actions will be subject to appropriate disciplinary measures, in line with the Company's disciplinary procedures and applicable regulations.

10. Fair Treatment

All individuals involved in or mentioned in a report will be treated fairly and with respect throughout the process:

- Investigations will be conducted objectively, independently, and without bias
- Individuals will be presumed innocent unless and until findings determine otherwise
- The right to respond to allegations will be respected and appropriately facilitated.
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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.
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13. To Report unethical or illegal activity within Coronation Life Assurance

You observed any unethical or illegal activity within Coronation Life Assurance?

We encourage you to speak up. Your report will be treated with the highest level of confidentiality.

Kindly report through any of the following channels:

✉ Email: kpmgethicsline@ng.kpmg.com

📞 Hotline: On Network Toll Free (MTN) 0703-000-0026

All-Network Toll Free 08001235276; 08001235764

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