

ANTI-RETALIATION POLICY

1. Our Commitment

At Coronation Insurance Plc (“the Company”), we are committed to fostering a culture of **integrity**, transparency, and accountability.

We believe that everyone—employees, agents, brokers, vendors, customers, and partners, should feel safe to speak up about concerns without fear.

We do **not tolerate retaliation** in any form against anyone who raises a concern or participates in an investigation in good faith.

2. Who is Protected?

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

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

3. What Does This Policy Cover?

You are protected under this Policy if you, in good faith:

- Report a concern or suspected misconduct
- Provide information or evidence
- Participate in an investigation, audit, or review
- Ask questions about compliance, ethics, or Company policies
- Refuse to engage in wrongdoing

You will be protected **even if your concern is not ultimately confirmed**, as long as it was raised honestly.

4. What is Retaliation?

Retaliation is any action taken against a person because they spoke up or participated in a compliance-related process.

Examples include:

Direct Retaliation

- Termination of employment or contract
- Demotion or reduction in responsibilities
- Salary reduction or denial of benefits
- Threats, harassment, or intimidation
- Unfair disciplinary action

Indirect or Subtle Retaliation

- Exclusion from meetings or projects
- Ignoring or isolating the individual
- Withholding important work information
- Unfair reassignment or transfer

Business and third-party relationships

- Unfair termination of agency or broker relationships
- Withholding commissions or business opportunities
- Discriminatory treatment of vendors or partners

5. What is Not Retaliation?

Not all negative actions are retaliation. For example:

- Performance-related actions based on objective evidence
- Legitimate disciplinary actions for misconduct
- Business decisions unrelated to a reported concern

However, all such actions must be fair, justified, and properly documented.

6 Good Faith Reporting

This Policy protects individuals who report concerns:

- Honestly and sincerely
- With a reasonable belief that the information is true

We do not protect:

- Malicious or knowingly false reports
- Deliberate misuse of the reporting process

7. How to Report Retaliation

If you believe you have been retaliated against or have witnessed retaliation - you should report immediately through any of our speak-up channels:

For more details, please refer to our Whistleblowing Policy.

8. What Happens After You Report?

We take all reports seriously and will:

- Treat your report confidentially
- Conduct a fair and independent investigation
- Take appropriate action where retaliation is confirmed

This may include disciplinary action or other corrective measures.

9. Confidentiality and Data Protection

We are committed to protecting your privacy:

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

10. Consequences of Retaliation

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

- Termination of employment or contract
- Withdrawal of business relationships
- Taking Regulatory or legal action (where applicable)

11. Our Responsibility Management

- Create a safe and open environment
- Encourage employees and partners to speak up
- Prevent and address retaliation

Everyone

- Speak up in good faith
- Report retaliation when observed
- Support a culture of integrity

12. Continuous Improvement

We continuously improve our speak-up framework by:

- Monitoring trends and reporting patterns
- Reviewing effectiveness of reporting channels
- Updating policies in line with regulatory requirements

13. Contact Us

For questions or to report a concern:

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

✉ 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/#>