

# ANTI-RETALIATION POLICY

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## 1. Our Commitment

At Coronation Life Assurance Limited (“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)

## 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/#>