





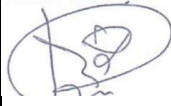
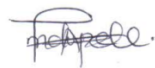
WHISTLEBLOWING POLICY

EFFECTIVE: 1ST JANUARY 2024

DOCUMENT CONTROL

VERSION	REVISION DATE	REVISED BY	SUMMARY OF CHANGE / SECTION REVISED
1	January 2019	Compliance Dept	
2	January 2021	Compliance Dept	Review Of Whistleblowing Procedure Change of Document Owner and Department in Charge of Implementing the Whistleblowing Policy.
3	January 2024	Compliance Dept	Inclusion of NAICOM Whistleblowing Guidelines. Inclusion of procedure to manage and report Suspicious Transactions. Inclusion of procedures for Protecting the whistleblower\.

APPROVAL

NAME	DESIGNATION	SIGNATURE	DATE
Chief Joshua Bernard Fumudoh	Board Chairman		31-12- 2023
Daniel Braie	MD/CEO		31-12- 2023
Taoheed Sikiru	CIA		31-12- 2023
Compliance Department	CCO		31-12- 2023

MANUAL SUMMARY

Document Name:

**LINKAGE ASSURANCE PLC
WHISTLEBLOWING POLICY**

Document Status:

This is a controlled document. Whilst this document may be printed, the electronic version is maintained on the Linkage Assurance Plc.'s Intranet.

Related Documentation¹

Title	Version	Date	Owner
Grievance Resolution Policy			Human Capital Unit
Discipline and Disciplinary Procedures			Human Capital Unit

DOCUMENT REVIEW

This document shall be subjected to review every three (3) years. It shall also be subjected to review upon changes in relevant legislation and regulations governing the Company's or industry operations. The review may be done by an addendum or endorsements to this document depending on the scope and depth of the review required.

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1.0 INTRODUCTION

1. An important aspect of accountability and transparency in running a Company is a mechanism to enable all individuals, both staff members and parties external to the Company, to voice concerns internally responsibly and effectively when they discover information that they believe shows serious malpractice, fraud, misconduct, or wrongdoing by employees and/or management of the Company.
 2. It takes courage to blow the whistle on wrongdoing at work and those brave enough to raise their concerns are putting their livelihood, friendships, and health on the line. In some cases, they might even be risking their lives. Thus, those brave enough to blow the whistle on wrongdoing in Linkage Assurance Plc. (to be called "Linkage" or "Company" in this document) need to be protected against the likely pain and suffering they may face.
 3. This Policy has been drawn up to ensure that mechanisms exist whereby concerns raised by staff members and/or parties external to Linkage will be addressed quickly and effectively. This Policy also sets out the recommended course of actions that whistleblowers should take if a matter is not addressed or if they feel that raising this internally could result in evidence of malpractice being concealed.
 4. This Policy and the procedures contained within it are non-contractual and may be modified or withdrawn at any time.
 5. The Policy should be read in conjunction with the procedural documents outlined in the "Related Documentation" on page 1
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2. SCOPE

1. This Policy applies to all employees of Linkage, other individuals performing functions concerning the Company, such as agents, brokers, workers, and contractors are also encouraged to use it.
 2. This procedure is for disclosure about matters other than a breach of an employee's contract of employment. If an employee is concerned that his/her contract has been or is likely to be broken, he/she should use the Grievance Resolution Policy
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3. THE POLICY

1. The National Insurance Commission (NAICOM) Guidelines

- a. The Whistleblowing Policy complies with paragraph 11.0 of the Corporate Governance Guideline 2021 issued by NAICOM for insurance and reinsurance companies of Nigeria.
- b. The paragraphs “b to f” below are taken from Principle 19 of the Nigerian Code of Corporate Governance 2018 issued by the Financial Reporting Council, Federal Ministry of Industry, Trade, and Investment.
- c. The Code requires companies to have a whistle-blowing policy which should be known to employees, stakeholders such as contractors, shareholders, job applicants, and the public. It is the responsibility of the Board to implement such a policy and to establish a whistle-blowing mechanism for reporting any illegal or substantial unethical behavior.
- d. The whistle-blowing mechanism should be accorded priority, and the Board should also reaffirm continually its support for and commitment to the Company's whistle-blower protection mechanism.
- e. The whistle-blowing mechanism should include a dedicated hotline or e-mail system which could be used anonymously to report unethical practices. A designated senior-level officer should review the reported cases and initiate appropriate action, if necessary, at the level of the Board or CEO/MD to redress the situation.
- f. The designated senior-level officer assigned to review reported cases should provide the Chairman of the Board Audit and Compliance Committee with a summary of reported cases, cases investigated, the process of investigation, and the result of the investigation.

2. Linkage Assurance Whistle-Blowing Policy

This Whistle-Blowing Policy for Linkage will be established to ensure that all cases of suspected wrongdoing are reported and managed in a timely and appropriate manner.

3. Policy Statement

Whoever we may deal with and wherever we may operate, we are committed to doing so lawfully, ethically, and with integrity. It is the responsibility of everyone in Linkage to ensure that we fulfill this commitment in our day-to-day working lives. We all have both a legal and moral duty to take appropriate measures to identify situations (where we suspect or know that something is improper, unethical, or inappropriate that affects others such as clients, suppliers, other staff, the Company, or the public interest in general) and attempt to remedy them.

Thus, the policy will provide a method of properly addressing bona fide concerns that individuals within the Company might have, while also offering whistleblowers protection from victimization, harassment, or disciplinary proceedings.

4. Policy Objectives

The objective of the Policy is to:

- i. Ensure Linkage Assurance employees feel supported in speaking up in confidence and reporting matters they suspect may involve anything improper, unethical, or inappropriate.
- ii. Encourage all improper, unethical, or inappropriate behavior to be identified and challenged at all levels of the Company.
- iii. Provide clear procedures for reporting such matters.
- iv. Manage all disclosures in a timely, consistent, and professional manner.
- v. Provide assurance that all disclosures will be taken seriously, treated as confidential, and managed without fear of retaliation.

5. Fundamental Elements of the Policy

The fundamental elements of the policy are:

- i. All staff members of Linkage are protected from victimization, harassment, or disciplinary action as result of any disclosure, where the disclosure is made in good faith and is not made maliciously or for personal gain.

- ii. Any disclosures will be investigated fully including interviews with all the witnesses and other parties involved.
- iii. Anonymity — Normally individuals should make disclosures internally. The identity of the whistleblower will be protected at all stages in any internal matter. While Linkage Assurance Plc. can protect internal anonymity, it cannot guarantee that this will be retained if external legal action flows from the disclosure.
- iv. Whilst Linkage encourages whistleblowers to identify themselves, anonymous calls (or emails) will nevertheless be taken seriously and investigated fully. However, the effectiveness of any whistleblowing enquiry may be limited where an individual chooses not to be identified.

6. Approval and Adoption

This policy does not form part of Linkage's contract of employment, but it is a statement that improper, unethical, or inappropriate behavior within the organization is unacceptable, and this statement is endorsed and supported at the highest level. Thus, the policy will be reviewed and approved by the Board Audit & Compliance Committee, and it will be adopted by the Board of Directors of Linkage Assurance Plc.

4. What is Whistle Blowing?

Whistleblowing is the confidential disclosure by an individual of any genuine concern encountered in the workplace relating to perceived wrongdoing (which is happening now, took place in the past, or is likely to happen in the future). Linkage will consider such wrongdoing to include the following (non-exhaustive list):

- i. General malpractice - such as immoral, unethical conduct.
- ii. Gross misconduct.
- iii. Fraud.
- iv. A criminal offense.
- v. Failure to comply with a legal obligation, for example:
 - Breach of contractual obligation

- statutory duty or requirement, or administrative requirement, including suspected fraud, malpractice, or breach of Linkage's Code of Ethics.
 - vi. A danger to the health and safety of any individual.
 - vii. Potential infractions of audit (or other applicable) regulations.
 - viii. Potential infractions of Linkage Code of Practice.
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5. Who is a Whistleblower?

- a. A whistleblower is any person or party who conveys a concern or any information indicating that fraud, corruption, or any other misconduct that is occurring or occurred in Linkage Assurance Plc., with knowledge or good faith belief that the concern, allegation, or information is true. Such persons or parties without limitation, include the following:
 - i. All employees of Linkage.
 - ii. Contractors and sub-contractors
 - iii. Agency staff.
 - iv. Consultants.
 - v. Work experience or other trainees.
 - vi. Customer
 - vii. General Public
 - b. The whistleblowers are reporting parties, and they rarely have a personal interest in the outcome of any investigation into his/her concerns. They are neither investigators nor finders of fault.
 - c. They do not determine if corrective measures are necessary, and they do not determine the appropriate corrective or remedial action that may be warranted.
 - d. As a result, the whistleblower should not be expected to prove their case; rather he or she raises the concern so others can address it.
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6. GUIDING PRINCIPLES OF WHISTLEBLOWING

- a. **Understand the Policies:** Familiarize yourself with your organization's policies on whistleblowing. These policies often outline the procedures for reporting concerns.
- b. **Gather Evidence:** Collect and document evidence of the wrongdoing. This might include emails, documents, or records that support your claim.
- c. **Identify the Correct Channels:** Determine the appropriate person or department to whom you should report. This could be a supervisor, a compliance officer, a designated whistleblower hotline, or an external authority.
- d. **Prepare a Report:** Create a detailed report outlining the issue, including specific instances dates, and evidence, while maintaining confidentiality as needed.
- e. **Report the Concern:** Submit your report through the designated channels, following the procedures outlined in your organization's policies. Ensure your report is factual, objective, and clear.
- f. **Protect Yourself:** Understand your rights and protections as a whistleblower. Document your actions and keep copies of all correspondence related to the issue.
- g. **Follow-Up:** After reporting, follow up with the appropriate authorities to ensure that your concerns are being addressed and investigate the progress made.
- h. **Consider External Options:** If the issue isn't addressed or if you face retaliation, you may need to seek legal advice or report the matter to external regulatory bodies or government agencies.

Remember, whistleblowing can have significant personal and professional implications, so it's crucial to approach it with caution and ensure your actions are based on solid evidence and within legal boundaries.

7. PROCEDURES FOR WHISTLEBLOWING

The procedures for whistleblowing shall depend on whether the allegation or information is being made or disclosed by Linkage staff or by a party external to Linkage.

7.1. Procedures for Linkage Staff

Linkage staff members are expected to whistle blow on transactions, operations, and any other activities of Linkage that involve fraud, corruption, and misconduct, whether internal or external.

S/N	Procedure	Actions
1	Report disclosure or concern	<p>Linkage staff shall make disclosures through the following means:</p> <ol style="list-style-type: none"> i. A formal letter marked "Private and Confidential" addressed to the MD/CEO, Chief Compliance Officer, or the Chief Internal Audit (it can be named or anonymous). ii. Oral discussion with a line manager and/or management staff (where the Linkage Staff feels uncomfortable discussing the matter with his immediate supervisor or feels there is a potential threat in doing so), he may disclose the matter to a management staff. iii. Whistleblowing hotline: 08156662066. iv. Whistle-blowing email address whistleblower@linkageassurance.com. v. Suggestion box: a suggestion box has been placed by the stairway where whistleblowers can discreetly drop their mail. vi. Via Linkage website: www.linkageassuranceplc.com, click on the whistleblowing policy. <p>Upon receipt of disclosure from a Linkage Staff by a Line Manager/Management Staff, the recipient shall inform the Chief Internal Audit.</p> <p>The disclosure shall be registered and where the identity of the Linkage Staff is known, acknowledge receipt of allegation, and where appropriate to the nature of the information or allegations explain the subsequent actions to be taken and give an indication of when such actions are to be taken.</p> <p>The Chief Internal Audit shall within three months of receipt of a disclosure send an official correspondence of a preliminary evaluation to the Linkage Staff that made the disclosure.</p> <p>Where a disclosure directly affects the Chief Internal Audit, it should be directed to the MD/CEO, and where it concerns the MD/CEO, it should be directed to the Chairman, Board Audit & Compliance</p>

		Committee
2.	The Investigation	<p>The Chief Internal Audit will upon receipt of disclosure carry out a preliminary evaluation of the information received to determine:</p> <ul style="list-style-type: none"> ▪ Whether there are grounds for more detailed information ▪ To ascertain if there is tangible and credible information. ▪ If the report was made in good faith. <p>If the preliminary evaluation reveals tangible and credible information that supports the existence of conditions for whistleblowing according to this policy, a full investigation will be launched.</p> <p>The person who is the subject of the investigation shall be informed, unless, in the view of the Chief Internal Audit, such communication will interfere with the investigation or related investigations.</p> <p>During the investigation, if the disclosure made by the whistleblower is found to be frivolous or malicious, disciplinary action will be taken against the whistleblower.</p>

7.2. Procedures for Parties External to Linkage Assurance

Parties external to Linkage are required to bring allegations or complaints of corruption, fraud, and any other misconduct in the execution of Linkage's project or during their transactions with Linkage. This will be done through the following procedure:

S/N	Procedure	Actions
1	Report disclosure or concern	<p>Parties external to Linkage shall make disclosures through the following means:</p> <ul style="list-style-type: none"> i. A formal letter marked "Private and Confidential" addressed to the MD/CEO, Chief Compliance Officer, or the Chief Internal Audit (it can be named or anonymous) ii. Whistleblowing hotline 08156662066 iii. Whistle-blowing email address whistleblower@linkageassurance.com.

		<p>iv. Via Linkage website: www.linkageassuranceplc.com, click on the whistleblowing policy.</p> <p>The disclosure shall be registered and screened by the Chief Internal Audit and shall be evaluated to determine its credibility, materiality, and verifiability.</p> <p>In a situation where the disclosure is made to staff, such staff is to present the complaint to the Chief Internal Audit.</p> <p>Where a disclosure directly affects the Chief Internal Audit, it should be directed to the MD/CEO, and where it concerns the MD/CEO, it should be directed to the Chairman, Board Audit & Compliance Committee.</p>
2.	The Investigation	<p>The Chief Internal Audit, will upon receipt of a disclosure, carry out a preliminary evaluation of the information received to determine:</p> <ul style="list-style-type: none"> ▪ Whether there are grounds for more detailed information. ▪ To ascertain if there is tangible and credible information. ▪ If the report was made in good faith. <p>If the preliminary evaluation reveals tangible and credible information that supports the existence of conditions for whistleblowing according to this policy a full investigation will be launched.</p> <p>The person who is the subject of the investigation shall be informed unless, in the view of the Chief Internal Audit, such communication will interfere with the investigation or related investigations.</p> <p>During the investigation, if the disclosure made by the whistleblower is found to be frivolous or malicious, legal action will be taken against the whistleblower.</p>

7.3. Information to be disclosed.

- i. The information to be disclosed by the whistleblower includes the following:
- i. An outline of the known or suspected wrongdoing.
 - ii. Details about when, where, and how it occurred.
 - iii. Documentary evidence must be provided if available.

- iv. A witness to corroborate the information if any.
 - v. A list of the names of those suspected of being involved.
 - vi. A list of the names of anyone who may have relevant information.
 - vii. The name of anyone the whistleblower has discussed or reported the incident.
 - viii. The whistleblower's name if he/she does not need to be anonymous — these will be kept confidential as far as reasonably practicable.
 - ix. The date and time of making the report.
- ii. The whistleblower must be identified through a code being given by the Chief Internal Audit if he or she is a staff of Linkage Assurance.
 - i. The “whistleblowing ID number” is to be randomly and independently generated by the Chief Internal Audit, and to be communicated to each staff of Linkage via the official email addresses.
 - ii. The “Whistleblowing ID number” is a unique secret number assigned to each Linkage staff and it must be clearly stated in any form of communication with the Chief Internal Audit.
- iii. Parties external to Linkage must clearly state their full names and employers including their address for communication with the Chief Internal Audit. No whistleblowing ID number is required for parties external to Linkage Assurance.
- iv. The Chief Internal Audit must maintain two registers:
 - i. First, a register of all whistleblowers (both Linkage staff and parties external to Linkage) which will be used to check whether a whistleblower is facing retaliation because of being a whistleblower in the past.
 - ii. Second, a register of staff names with corresponding “whistleblowing ID numbers.
 - iii. All disciplinary actions carried out against any Linkage staff and party external to Linkage should be recorded by the Chief Internal Audit, and the details of such actions to be submitted to the Board Audit & Compliance Committee for review in line with the whistle blowing Policy.

- iv. Further investigation should be carried out by the Chief Internal Audit to check whether whistle-blowing is the cause of the disciplinary action.

7.4. Disciplinary Actions.

The following actions need to be taken by the Chief Internal Audit after the investigation of the concern:

Where wrongdoing(s) as contained in the whistleblower report is/are established to be true, CIA shall recommend appropriate disciplinary action as contained in the Linkage Assurance sanction grid, and where otherwise, the malicious whistleblower will receive equivalent disciplinary sanction. Enforcement of the applicable sanction should be monitored and reported by the CIA in the Register.

Note: Whistleblower may not be protected if he/she breaks another law in blowing the whistle.

8. CHANNELS OF BLOWING THE WHISTLE

1. Observed concerns can be raised to the authorities using any of the following options as stated in the policy:

S/N	MEDIUM	CHANNEL
1	By Hotline	08156662066
2	By a well-secured e-mail address	whistleblower@linkageassurance.com
3	By the website	www.linkageassuranceplc.com
4	By Suggestion box	A suggestion box with a lock has been placed at the Security Post where mail can be dropped
5	By Oral discussion	The line manager and/or the management staff who will Pass the information to the Chief Internal Audit
6	By post	To be marked "Private and Confidential" with reference to "Whistleblowing", named or anonymous and addressed to the Chairman of Board Audit & Compliance Committee. However, depending on the issues to be blown, mails by post marked "Private and Confidential" can also be addressed to any of the following:

		<ul style="list-style-type: none"> • MD/CEO • Chief Compliance Officer • Chief Internal Audit
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Employees and third parties are encouraged to use the channel most suitable to achieve the purpose of the whistleblowing.

2. The whistleblower (external and internal) can do a public disclosure through the following regulatory bodies, depending on the nature of the disclosure:

S/N	REGULATOR	ADDRESS
1.	National Insurance Commission (NAICOM)	Plot 1239 Ladoke Akintola Boulevard, Garki II, P.M.B 457 Garki, Abuja, Nigeria. Telephone: 092915101 email: info@naicom.gov.ng
2	Securities and Exchange Commission (SEC)	SEC Towers, Plot 272 Samuel Adesujo Ademelegun Street, Central Business District P.M.B 315 Garki, Abuja, Nigeria. Phone: 094621159 email: sec@sec.gov. ng
3	Nigerian Stock Exchange (NSE)	Stock Exchange House 2/4 Custom Street, P.O. Box 2457 Marina, Lagos, Nigeria. 01-4419373, 08172.43061. email: x-whistle@nse.com.ng
4	Corporate Affairs Commission (CAC)	Plot 420 Tigris Crescent, Off Aguiyi Ironsi Street, Maitama, P.M.B 198 Garki, Abuja, Nigeria. 08095521924
5	National Pension Commission (PENCOM)	Plot 174 .4detokur\be Ademola Crescent, Wuse 2, Abuja, Nigeria. Phone: 094603930 email: info@pencom.gov.ng

9. OBLIGATIONS AND RIGHTS OF WHISTLEBLOWER.

1. In furtherance of the Policy objectives, Linkage staff shall have obligations and rights, amongst which are the following:

- i. Linkage Staff are duty bound to disclose any fraud or corruption that comes to their attention immediately but in any event not later than two weeks (14 days)

after becoming aware of the fraud or corruption. Violation of this duty shall be subject to disciplinary action. Furthermore, disciplinary action shall be taken against Linkage staff members who knowingly prevent or cover up any acts of fraud or corruption. Linkage staff shall be deemed to have discharged a reporting obligation once a report is made to:

- a. The hotline, email, and suggestion box to enable anonymous disclosures.
 - b. His or Her Supervisor
 - c. Chief Internal Audit
 - d. MD/CEO
 - e. Board Audit & Compliance Committee
- ii. As a matter of general deterrence, Linkage shall publicly inform Linkage staff of the penalty imposed and discipline of a manager for misconduct arising from retaliation.
 - iii. The Extract of the report of the Chief Internal Audit recommending relief (where the blower had suffered damages) shall be furnished to the whistleblower. Upon receipt of the report, or after ninety (90) days from the filing of the report, the whistleblower may accept the conclusions and recommendations of the Chief Internal Audit or may reject them in whole or in part and request an alternative dispute resolution mechanism such as conciliation to be established by Linkage for the said purpose.
 - iv. The whistleblower shall have a prior opportunity to review any communication that would lead to exposure.

10. PROTECTION OF WHISTLEBLOWERS

The success of the Whistleblowing Policy depends in part on the conscience and professional ethics of the whistleblower and the attendant assurance of confidentiality. Nonetheless, perceived ostracism by peers, harassment, or victimization by management can be disincentives to whistle-blowing. To avoid the psychological pressures such conflicts can cause whistleblowers, Linkage shall protect the whistleblowers who report a whistleblowing concern in good faith.

10.1. Protection of Whistleblower's Identity

- a. Linkage will protect the whistleblower's identity and person from retaliation. For the whistleblowing mechanism to be effective, the concerned parties must be adequately assured that the information given will be treated in a confidential manner and above all that they will be protected against retaliation from within or outside Linkage. Linkage will maintain as confidential the whistleblower's identity unless:
 - i. Such a person agrees to be identified.
 - ii. Identification is necessary to allow Linkage or the appropriate law enforcement officials to investigate or respond effectively to the disclosure.
 - iii. Identification is required by law or under Linkage's rules and regulations, where a false accusation has been maliciously made.
 - iv. The person accused is entitled to the information as a matter of legal right or under Linkage's rules and regulations in the disciplinary proceedings. In such an eventuality, Linkage shall inform the whistleblower prior to revealing his or her identity.
- b. To the extent possible, the Chief Internal Audit shall guarantee confidentiality of the identities of whistleblowers. An individual who submits an allegation or is a witness during an investigation shall, subject to Linkage's rules and regulations, have his or her identity protected by the Chief Internal Audit.
- c. Where there has been an unauthorized disclosure of the identity of a whistleblower or someone assisting in the Chief Internal Audit's inquiries, the Chief Internal Audit shall institute the appropriate disciplinary measures available in Linkage's rules and regulations. For example:
 - i. Linkage will insert clauses in its agreements, such as staff handbooks, staff loan agreements, and grant agreements, that allow disciplinary actions to be taken against persons who engage in an unauthorized disclosure of the identity of a whistleblower. An example of such a clause is, "loan agreements will be withdrawn where the Borrower discloses the identity of a whistleblower".

10.2. Protection of Whistleblower's Employment

Employment remedies available to a whistleblower against whom there has been retaliation shall be determined by the Board of Directors based upon the findings and recommendations of the Chief Internal Audit and shall include but not be limited to:

- a. Reinstatement to the same or comparable position in salary, responsibility, opportunity for advancement, and job security.
- b. Back benefits and pay, with consideration of the likely advancement and salary increases that a staff member would have received.
- c. Compensatory damages, including financial losses linked to the retaliatory action by Linkage and significant emotional distress, including any physical ailments suffered because of that distress and related medical costs.
- d. Adjudication expenses, including representation fees, costs of expert witnesses, travel, and other costs associated with the claim of retaliation. These costs should be automatically paid to a prevailing whistleblower.
- e. Transfer upon the request of the prevailing whistleblower to another part of the Company (e.g., Department or Branch).
- f. Intangible benefits, including public recognition of the vindication of the whistleblower, and in appropriate circumstances public recognition of the contributions of the whistleblower to Linkage.

10.3. Protection of Whistleblower's Well-being

In addition to the remedies enumerated in paragraph 10.2. above, the Chief Internal Audit shall recommend further relief, as follows:

- a. Where there is a reasonable concern that the whistleblower (an employee of Linkage) may suffer personal injury or that the safety and well-being of the employee's family may be at risk, the Chief Internal Audit shall accord the employee with whistleblower

status and take available measures to secure his or her personal and family safety and security, as an interim relief recommendation.

- b. Where the Chief Internal Audit determines that the whistleblower is in a life- threatening situation, the Chief Internal Audit shall take immediate necessary action to protect the whistleblower and promptly inform the Board Audit & Compliance Committee of the circumstances and actions taken to protect the Whistleblower.
- c. Where Linkage staff has suffered retaliation or is threatened with retaliation because of assistance he or she gave in an investigation or audit, on the recommendations of the Board Audit & Compliance Committee, the Chief Internal Audit shall take steps to prevent such actions from taking effect or otherwise causing harm to Linkage staff. Consequently, Linkage staff who believe that retaliatory action has been taken against him or her because of whistle-blowing or cooperating in an investigation or audit should contact the Chief Internal Audit with all information and documentation available to them in support of their complaint. The Chief Internal Audit shall as a matter of exigency review the evidence provided and decide or order an immediate investigation. On the recommendation of the Board Audit & Compliance Committee, the Chief Internal Audit shall immediately provide protection from retaliation for the affected Linkage staff.
- d. Where Linkage staff can show evidence of being mistakenly identified as a whistleblower and consequent retaliatory action taken against him or her, the affected Linkage staff shall report the matter to the Chief Internal Audit with all information and documentation available to them in support of their complaint. The Chief Internal Audit shall as a matter of exigency, review the evidence and make appropriate recommendations to the Board Audit & Compliance Committee for remedial relief.
- e. Where Linkage staff can show evidence that before the alleged retaliation, the Linkage staff had reported or was in the process of reporting an instance of Fraud, Corruption, or any other Misconduct to the Chief Internal Audit such Linkage staff shall be deemed to have satisfied the minimal burden of proof. The burden of proof shall then shift to Linkage to prove by clear and convincing evidence that the action taken by Linkage against such Linkage staff was for separate and legitimate reasons, and not in reprisal or retaliation for the malpractice reported by the Linkage staff.

10.4. Protection of Parties External to Linkage

Retaliation shall not be permissible against any whistleblower whether an employee or a party external to Linkage. "Retaliation" means any act of discrimination, reprisal, harassment, or vengeance, direct or indirect, recommended, threatened, or taken against a whistleblower by any person because the whistleblower has disclosed according to this Policy.

- a. Where a party external to Linkage reasonably believes he or she is threatened with retaliation because he or she assisted in an investigation or an audit by Linkage, on the recommendation of the Chief Internal Audit, the Board Audit & Compliance Committee shall commit Linkage to provide reasonable and appropriate assistance to secure that party's protection.
- b. If retaliation occurs at the hands of a party external to Linkage (e.g., the Company's contractors), then the contract in question with Linkage will become subject to immediate review and possible termination.

10.5. Protection against Retaliation for Public Disclosure

Before making any public disclosure of fraud, corruption, or misconduct, Linkage staff should first utilize the procedures set out in the Policy. Protection against retaliation for making a public disclosure by Linkage staff shall be available where:

- a. Such disclosure is necessary to avoid:
 - A significant threat to public health and safety
 - Substantive damage to the Linkage's operations.
- b. The use of internal mechanisms is not possible because:
 - At the time the disclosure is made, the individual has grounds to believe that he/she will be subjected to retaliation by the person(s) he or she should report to according to the established internal mechanism.
 - It is likely that evidence relating to the misconduct will be concealed or destroyed if the individual reports to the person(s) he or she should report to pursuant to the established internal mechanism.

- The individual has previously reported the same information through the established internal mechanisms, and Linkage has failed to inform the individual in writing of the status of the matter within six months of such a report.

10.6. STR/SAR Following a Disclosure/Whistle-Blowers

We must remain vigilant for any additional transactions by, or instructions from, any customer or account in respect of which disclosure has been made, and should submit further disclosures to NFIU, as appropriate.

The disclosure provisions within AML/CFT/CPF legislation protect persons making STRs/SARs from any potential breaches of confidentiality, whether imposed under contract, statute, or common law. The protection code of the Chief Compliance Officer and Money Laundering Reporting Officer under Regulation 25 of NAICOM AML/CFT/CPF Regulations 2022 applies. In the same vein, all employees are required to make the report of a violation confidential and that they shall be protected from victimization for making such report and the provisions of Regulations 3 (7) (a-b) shall also apply.