



RC: 321924  
**PIPC SECURITIES LIMITED**  
(MEMBER OF THE NIGERIAN STOCK EXCHANGE)



## WHISTLE BLOWING POLICY

### 1.0 Whistle Blowing Procedures and Standards

PIPC Securities Limited cherishes its values, business principles, rules of ethics and general rules and regulations including codes of conduct. Consequently, we ensure the escalation of unethical or illegal conduct and practices that depart from our values and business principles to be within reach of the aggrieved.

### 2.0 Reportable Deeds

Where there is any iota of manifestation of the underlisted, it can be reported:

- 2.1 A conduct which goes contrary to PIPC Securities Limited's notified values and vision, code of conduct, policies and procedures;
- 2.2 Breach of rules and regulations;
- 2.3 Misuse of company resources and assets;
- 2.4 Acts capable to pose threats to health and safety of anybody and
- 2.5 A deliberate concealment of information.

### 3.0 Whistle blower

Persons who have reasonable suspicion that such act is or are about to be committed or has been committed can notify the undersigned officer / department of it. It should be done in good faith and without ill motive and neither should it be targeted such that it is to be beneficial to the escalator and it must be true as it concerns the member of staff, or their group, clients, contractors and vendors.

### 4.0 How can you raise it?

PIPC Securities Limited hereby assure the confidentiality of disclosures by whistle blowers and their safety with regards to it. The manner of the disclosures such as either "confidential" or "anonymous" whistle blowing is that of the whistle blower alone. The investigator ensures that no contact is created with the whistle blower directly.

### 5.0 How anonymous whistle blowing can be done?

It is unlike confidential disclosure, it involves a situation where a whistle blower does not disclose his or her identity. PIPC Securities Ltd has set up a direct hotline which employees may use to make disclosures. Complaints boxes have been set up at the entrance of the Headquarters and branch with keys kept with the compliance department. The box is open daily and disclosures are reviewed by the compliance department, in turn also escalate same to the management and Directors for action. Equally, e-whistle blowing emails are set up such that disclosures come directly to the compliance department for action.

### 6.0 Whistle blowing contact details:

**e-mail:** [fraud.compliance@pipcsec.com.ng](mailto:fraud.compliance@pipcsec.com.ng)

**Phone:**

**Approved by:** PIPCSEC Board of Directors

**Approval date:** 31<sup>st</sup> December, 2020

**Effective date:** 1<sup>st</sup> January, 2021

**Next review date:** Annual review