

KPMG in Nigeria Whistle blowing Policy

The KPMG Whistle blowing process is a vehicle for KPMG personnel, clients and other parties to confidentially report concerns they have relating to certain areas of activity by KPMG Nigeria, its staff or the senior leadership of the firm. Further information is given below on when and how to use the Whistle blowing process, and how your report will be dealt with.

When to use the KPMG Whistle Blowing Process

KPMG recognises and understands that reporting a concern can be very difficult, especially where it relates to a superior. However, if what is to be reported represents the correct position of things in the honest belief of the whistleblower, there is absolutely nothing to worry about, as the firm will consider such report as a great service which enhances integrity and equity in its internal processes and protects its brand image.

Whistleblowers should be assured that KPMG will not tolerate any **harassment** or **victimisation** whatsoever and howsoever arising, including but not limited to informal pressures, and will take appropriate actions and measures to protect the whistleblower, to the fullest extent permitted by applicable laws, when a concern in good faith is raised.

We encourage reporting of issue or event, using this Whistle blowing process, in all situations.

Confidentiality of the Whistle blowing Process

All concerns and issues raised will be treated in strictest confidence and every effort, to the fullest extent permitted by applicable laws, will be made to ensure that whistleblower's identity is protected. All information (including documentary evidence) will not be disclosed

to or discussed with other persons particularly third parties who are the subject of the report, save and except for the purpose of investigation or where such disclosure is required by a legal or regulatory authority including courts of competent jurisdiction.

The firm, is therefore, committed to protecting the identity of whistleblower.

KPMG undertakes that no one who reports any concern under this policy in good faith will be subjected to any detriment for coming forward, regardless of whether or not the concern is ultimately substantiated.

In the event that whistleblowers believe that they are being victimised or subjected to hardships by any person within the firm as a result of reporting a concern or assisting the firm in any investigation under this policy, they must inform the Ombudsman – which for now, is the Head of Quality and Risk Management unit, immediately and appropriate action will be taken to protect them from any and further reprisals.

The Whistle blowing process has been developed to ensure that:

- a) The Firm bears the cost of the reporting i.e. the hotlines are toll free.
- b) Anonymity of the whistleblower is guaranteed as the process provides opportunity for non-disclosure of the identity of the whistleblower.
- c) There is a speed in response and resolution to concerns raised.

What is expected of a Whistleblower?

We expect a whistleblower to raise concerns and believe that appropriate actions will be taken. However, when doing so, a whistleblower is required:

- To disclose concerns in good faith;
- Not to act maliciously or make false allegations or statements that he does not believe to be true;
- Not to disclose for any personal gain or interest; and
- Above all, to act with integrity.

How to make a report

The KPMG Whistle blowing process offers four ways to report concerns:

- 1) by calling the dedicated “hotlines”
- 2) by sending email to the “hotmail”
- 3) by submitting using the “hotlink”
- 4) by submitting complaints using the “hotbox”

The hotline (an automated recording tool), hotmail, hotlink and hotbox are available 24-hours-a-day.

A whistleblower is encouraged to reveal his or her identity when a report is made. This approach significantly aids the investigation, as further contacts may be made to the whistleblower to provide more clarification and or details, where required.

However, where a whistleblower decides to conceal his or her identity, he or she must ensure that adequate information is provided to enable a thorough investigation of the claims or issues raised. Where adequate information is not provided and the identity of the whistleblower is not disclosed, the investigation into the matter may be significantly hampered.

What happens to a Report made by a Whistleblower?

All concerns raised by a whistleblower are promptly dealt with.

Where your concerns are raised through whistle blowing channels, an acknowledgment will be communicated to you within 48 business hours of receipt. Upon receipt of your concerns, the independent committee set up for that purpose will meet (if required), depending on the urgency of the matter, within 2 weeks of the concerns being raised.

Thereafter, consideration of the concerns is reported, and where necessary, proper conduct of an investigation on the concern, will take place. An invitation may be extended to the whistleblower to provide further information. Upon conduct of necessary investigation, a report will be generated summarizing the issues and the steps to be taken to mitigate such issues or in deserving cases, the decision to effect appropriate disciplinary actions to erring personnel.

Management reports will also be compiled by the Ombudsman, who analyzes the reports received, as well as identifying emerging trends in the nature of

information received.

Reports that are received which do not fall within the scope of the Whistle blowing process, for example, when reports relate to a different KPMG member firm, will either be referred onwards to the appropriate firm or KPMG International. The whistleblower will be notified that the matter has been referred to the appropriate authority or individual. Whatever the situation is, the report and whistleblower will be subject to appropriate confidentiality and non-retaliation procedures.

What is the expected outcome from the Whistle blowing process?

Upon the completion of the investigation, appropriate actions will be taken and communication will be made, in this order:

- (1) Whistleblower – to inform of the outcome of the investigation;
- (2) Affected Personnel (if required) – to communicate the outcome of the investigation and any disciplinary action that will be implemented;
- (3) Firm's Personnel (if necessary) – to share the lessons learnt.

In no circumstance will the identity of the whistleblower be disclosed, unless permitted by the whistleblower.

What happens if Whistle is blown in bad faith?

KPMG is keen to hear of any concerns that a whistleblower may have about wrongdoing at work and encourages all disclosures made in good faith. If, however, it should become clear that the procedures have not been invoked in good faith, for example for purely malicious reasons, this will constitute misconduct and will be dealt with in accordance with the terms of the Firm's disciplinary procedure. Similarly, disciplinary action is likely to follow an unjustifiable external disclosure made without first exhausting the internal procedure set out in this policy.

Whilst the KPMG Whistle blowing process offer the appropriate channels for reporting a range of concerns including professional misconduct and matters involving risks to the KPMG network and the handling of personnel grievances, this process should not be abused.

[Frequently Asked Questions \(FAQs\)](#)