

Policy

# Whistleblowing Policy - EMEA (Nigeria)

Current Effective Date: September 17, 2020

TABLE OF CONTENTS

- 1. Summary..... 2
- 2. Scope..... 2
- 3. What should be reported? ..... 2
- 4. Who to report to? ..... 2
  - 4.1. Reporting Internally..... 2
  - 4.2. Reporting Externally..... 3
- 5. Confidentiality..... 3
- 6. Prohibition of retaliation..... 3
- 7. If You Have Questions about this Policy..... 3
- 8. Defined terms..... 4
- 9. Document Information ..... 4

## 1. Summary

Workforce Members, depositors, service providers, creditors and other stakeholders of JPMC Nigeria should report concerns about actual or potential wrongdoing at work or related to the business of J.P.Morgan Chase & Co, and its direct and indirect subsidiaries (Firm or JPMC).

## 2. Scope

This policy applies to Workforce Members of JP Morgan Chase Representative Office (Nigeria) Limited (JPMC Nigeria).

## 3. What should be reported?

Reports should be made in respect of violations at work of this policy, any laws and regulation or any threat to life, national security or public interest. Acts of impropriety which should be reported includes any of the following:

- all forms of financial malpractice or impropriety or fraud;
- failure to comply with a legal obligation or statutes;
- actions detrimental to health and safety or the environment;
- any form of criminal activity;
- improper conduct or unethical behaviour;
- failure to comply with regulatory directives;
- other forms of corporate governance breaches;
- connected transactions;
- insider trading abuses;
- non-disclosure of interest; or
- attempts to conceal any of these.

A disclosure is deemed to have been made in accordance with the Central Bank of Nigeria's (CBN) Guidelines for Whistle-blowing for Banks and Other Financial Institutions in Nigeria if it is disclosed to JPMC Nigeria, another financial institution, the CBN and/or any other appropriate agency, provided that such disclosure is true and there is a reasonable belief of wrongdoing.

## 4. Who to report to?

JPMC Nigeria encourages Workforce Members to raise and expose any kind of information or activity at work that is illegal or unethical internally, however, you have the right to raise these concerns externally.

### 4.1. Reporting Internally

Concerns can be made by the following channels:

Telephone: [www.jpmc.ethicspoint.com](http://www.jpmc.ethicspoint.com)

Online: [www.jpmc.ethicspoint.com](http://www.jpmc.ethicspoint.com)

- Dedicated hotline number: +234 7080601241

## 4.2. Reporting Externally

Every Workforce Member and other stakeholders of JPMC Nigeria can make disclosures to a Central or State Vigilance Commission or to any other applicable body (including the CBN) in respect of information relating to a violation of financial regulations, mismanagement of public funds and assets, financial malpractice, fraud or theft committed in relation to internal stakeholders, inter-government stakeholders, institutional stakeholders or members of the public.

Your reporting obligations to JPMC Nigeria do not prevent you from reporting your concerns to any external body, regulator or commission and you are not required to notify JPMC Nigeria prior to making any disclosure.

- CBN telephone lines: : +234946239246 & +234946236000
- CBN e-mail addresses: [ethicsoffice@cbn.gov.ng](mailto:ethicsoffice@cbn.gov.ng) and [anticorruptionunit@cbn.gov.ng](mailto:anticorruptionunit@cbn.gov.ng)

## 5. Anonymity and Confidentiality

JPMC Nigeria must treat all disclosures in a confidential manner. The identity of the person making a disclosure must be kept confidential.

Generally, stakeholders are encouraged to disclose their names when making reports, however, anonymous disclosures may be considered on discretionary basis taking into account the following factors:

- the seriousness of the issues;
- the significance and credibility of the concern; and
- the possibility of confirming the allegation

## 6. Prohibition of retaliation

JPMC Nigeria strictly prohibits intimidation, victimisation or retaliation against any Workforce Members who report concerns in relation to any actual or potential wrongdoing as well as anyone who assists with any inquiry or investigation arising from a reported concern. This is the case even if, as a result of an investigation based upon your report, we determine that there was in fact no wrongdoing. However, if you made a false and malicious disclosure or intentionally provided false information (be it to JPMC Nigeria, any regulators or third parties), JPMC Nigeria may take disciplinary action against you, up to and including dismissal.

## 7. If You Have Questions about this Policy

If you are unsure as to the appropriate course of action you are encouraged to seek guidance. Talk to your manager/supervisor, your HR Business Partner, EMEA Compliance or a Code Specialist.

## 8. Defined terms

<b>Workforce Members</b>	Individuals providing services to JPMC Nigeria. This includes individuals directly employed by JPMC Nigeria (employees) and individuals not directly employed by JPMC Nigeria who are assigned a Standard ID for the purpose of provisioning a JPM Nigeria building access card and/or access to internal JPMC Nigeria systems
<b>JPMC Nigeria</b>	JP Morgan Chase Representative Office (Nigeria) Limited

## 9. Document Information

Policy Owner	Yushavia Naidoo		
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