



WHISTLE BLOWING POLICY

FRAMEWORK

Trustfund Pensions Limited (“the Company”) is guided by our company values. These values are the foundation on how we conduct ourselves; interact with each other, our clients, shareholders and other stakeholders. The Company is committed to ensuring corporate compliance and promoting a very strong ethical corporate culture by observing the highest standards of fair dealing, honesty and integrity in our business relationships across board.

The Company encourages the reporting of any instances of suspected unethical, illegal, corrupt, fraudulent or undesirable conduct involving the Company’s business and provides protection and measures to individuals who make such disclosures without fear of victimization or reprisal.

COVERAGE

The Chief Compliance Officer of Trustfund Pension Limited is obliged by Section 68 of the Pension Reform Act (PRA) 2014, to report to the Commission, any breach of the Pension Reform Act 2014, codes, guidelines, rules and regulations issued by the commission, in the course of the company’s business and this policy applies to any person who is, or has been, any of the following with respect to the Company:

- Employee
- Officer
- Director
- Consultant, Auditor, Associate and
- Relative, dependent, spouse, or dependent of a spouse of any of the above.

This policy is intended to apply to the above persons in all locations in which the Company operates its business or in any situation bordering on the company’s business.

REPORTING

Anyone that is aware of a breach, violation, or wrong that is likely to be of material significance to the organization may:

- Reach out to a confidential resource (listed below) to learn about options;
 - ❖ Immediate boss or unit head if the breach does not involve him/her,
 - ❖ Chief Compliance Officer or any other designated mandatory reporter, and/or report to the Board's Risk Management and Compliance Committee (if the issue requires such treatment.)
- Reports may be submitted in person, surface mail, and telephone, using the links and contact information in this policy.
- Reports may be made at any time using the listed means above.

CHANNEL FOR RECEIVED RESPONSE

- Officer
- Unit Head
- Chief Compliance Officer /HOD
- Company Secretary and General Counsel
- Executive Director
- MD/CEO
- Board Members

Please note the above is not in any order. Kindly report to the channel most comfortable for you

SUPPORTIVE OR PROTECTIVE MEASURES

Supportive measures are designed to protect the whistle blower, including but not limited to protecting the safety of his/her employment or to deter conduct prohibited under this policy.

COMPLAINTS

Complaints may be formal or anonymous.

The formal complaint must set forth the specific allegations of prohibited conduct against the respondent(s), must be signed (in writing or electronically), and must request that the company investigate the allegation(s). A claimant would not be considered anonymous once the complaint is signed.

SUMMARY

Every complaint would be thoroughly investigated and where culpable, the defaulter would be brought to book in line with our company policy on such infractions. Everyone is encouraged to say something if they see something.

WHISTLE BLOWING CHANNELS/HOTLINES

Email: ***Compliance@trustfundpensions.com***

Suggestion/Complaint/Whistle-blowing Box

Verbal or Written Disclosures.

1. Chairperson of Compliance, Audit and Risk Management Committee of the Board (CARM): oke.maduwesi@zaroncosmetics.com (08033166562)
2. MD /CEO: musa.nasr@trustfundpensions.com (08033209515)
3. Company Sec. and Gen. Counsel: Funmilayo.oluwo@trustfundpensions.com (08023063535)

4. Chief Compliance Officer::emuesiri.oshodi@trustfundpensions.com (08033604398)

UPDATE AND REVIEW

This policy shall be updated as the need arises.