



**JUBILEE INSURANCE COMPANY  
OF KENYA LIMITED**

**WHISTLEBLOWING POLICY**

## **1. INTRODUCTION**

From time to time, a member of staff might discover information which he or she believes shows wrongdoing or malpractice within the organisation. On such occasions, it must be made possible for the information to be disclosed without fear of reprisal to appropriate persons within the organisation.

In line with the above, this Policy is intended to provide various channels for reporting actual or suspected wrong-doings committed by any staff, supplier, service provider, contractor or other stakeholders dealing with the Company for investigation and appropriate action as well as assurance that the staff making the report (“Whistle-blower”) will be protected from reprisals, retaliation or any adverse treatment.

## **2. POLICY STATEMENT**

The Jubilee Insurance Company of Kenya is committed to the highest standards of honesty, openness and accountability. It aims to ensure that it operates in a responsible manner, taking into account ethical business standards set out by the Board of Directors. It recognises that individual members of staff have an important role in helping to achieve this aim.

It is often members of staff who are first to know if someone in the Company or connected with it is acting improperly. It is normal for such employees to feel apprehensive or anxious about raising their concerns and their loyalty to or fear of a colleague may prevent them from doing so. They might also be concerned that they will not be taken seriously, may be branded a “trouble maker” or a “snitch” or that adverse action may be taken against them especially if the subject of the report is a senior employee. However, The Jubilee Insurance Company of Kenya encourages staff and individuals who have knowledge, or reasonable suspicion of wrongdoing to come forward and report the same. The Company takes all wrongdoing seriously and believes that any report on any unlawful acts, acts of misconduct or impropriety should be investigated thoroughly. Individuals are encouraged and expected to, in the first instance, raise concerns internally through the provided mechanisms.

The purpose of this Policy is therefore to assist and enable staff members to raise concerns or to disclose information which they believe, in good faith, may indicate malpractice.

## **3. SCOPE OF THE POLICY AND PROCEDURE**

This Policy extends protection of Whistle-blowers to service providers, suppliers, contractors and intermediaries. The policy and procedures are concerned with alleged malpractice, impropriety or

wrongdoing and although it might be difficult to provide an exhaustive list, these might include the following:

- i. Financial malpractice or impropriety;
- ii. Conflict of Interest situations;
- iii. Fraud;
- iv. Improper conduct or unethical behaviour including any offence under the Bribery Act, 2016;
- v. Failure to comply with a legal obligation;
- vi. Failure to comply with the Code of Conduct and any rules and regulations that may be prescribed by the Company from time to time;
- vii. Suspected criminal activity;
- viii. Attempts to conceal any of the above.

#### **4. PROCEDURE FOR MAKING AND INVESTIGATING A DISCLOSURE**

The Jubilee Insurance Company of Kenya encourages employees and external stakeholders to report any of the above acts. Any staff wishing to make a report may disclose their identity or make reports anonymously. All reports will be treated with utmost confidentiality and will be acted upon, taking into account the seriousness and credibility of the issues raised and the likelihood of confirming the allegations from attributable sources and information provided.

All concerns or irregularities raised will be handled in confidence and every effort will be made to ensure that confidentiality is maintained throughout the process.

Concerns may be raised verbally, by email, website or Toll-free line. As it is essential for the Company to have all critical information in order to enable them effectively evaluate and investigate a complaint, the report made should provide as much detail and be as specific as possible.

The complaint/report should include:

- i. The misconduct the whistle-blower wishes to report on;
- ii. Details of the parties concerned;
- iii. When the activities took place (dates and time);
- iv. Proof (evidence substantiating the misconduct, where available);
- v. Motives (do they know or have an idea of why the action was committed);
- vi. Contact details (if the person reporting so chooses) in case further information is required.

The Reports can be made to any of the following persons:

1. **The CEO** - [contact-ceo@jubileekenya.com](mailto:contact-ceo@jubileekenya.com)
2. **The Group Chairman** - [contact-chairman@jubileekenya.com](mailto:contact-chairman@jubileekenya.com)
3. **Tip-offs Anonymous** - [jubileeinurance@tip-offs.com](mailto:jubileeinurance@tip-offs.com) or log on to [www.tip-offs.com](http://www.tip-offs.com) for directions on how to make your report or call a **Toll Free number 0800 722 626**. This is an external and internationally accredited hotline service provider which enables employees and other stakeholders to report workplace dishonesty while remaining totally anonymous.

Complaints raised to other parties within The Jubilee Insurance Company of Kenya should be directed to any of the above persons for the purpose of maintaining a centralized repository of all reported cases and ensuring that issues raised are properly followed-up investigated and addressed.

All matters reported will be reviewed within a reasonable timeframe and after due consideration and inquiry, a decision will be taken on whether to proceed with a detailed investigation.

All reports and actions taken will be reported to the Board Audit and Compliance Committee on a quarterly basis.

## 5. SAFEGUARDS

In keeping with applicable law, the Jubilee Insurance prohibits discrimination, retaliation or harassment of any kind against a Whistle - blower who submits a complaint or report in good faith. This is done through the following measures.

### 5.2 Confidentiality

The identity of the individual making an allegation will remain confidential, unless otherwise agreed with that individual.

### 5.1 Protection

The Policy offers protection against dismissal or other punitive action to those individuals who make reports in accordance to this Policy.

## 6. UNSUBSTANTIATED ALLEGATIONS

No action will be taken against an individual who makes an allegation in good faith even if it is not confirmed by subsequent investigations. If, however, an individual makes what are subsequently determined to be malicious or vexatious allegations or made for personal gain, and particularly if he or she persists in making them, disciplinary action may be taken.

## **7. HANDLING OF REPORTS**

The Company may in appropriate cases, particularly if the report pertains to criminal activity forward such report to external bodies like the police.

## **8. COOPERATION**

An employee who fails to cooperate in an investigation, or who deliberately provides false information during an investigation, shall be subject to disciplinary action up to, and including, dismissal.

If, at the conclusion of an investigation, the company determines that a violation has occurred or the allegations are substantiated, effective remedial action commensurate with the severity of the offence will be taken.

## **9. FAIR HEARING**

Any person named in a report will be given an opportunity to be heard and defend themselves before any action is taken.

## **10. INDEPENDENT ADVICE**

If a staff is not clear on this Policy or procedure for whistle blowing, they are advised to contact any of the following persons;

- i. The CEO;
- ii. The Company Secretary ;
- iii. The Head of Human Resources.

## **11. MODIFICATION**

This Policy may be modified from time to time as advised to the employees.