

# Whistle Blowing Procedure

This Whistleblowing procedure provides a mechanism for reporting any unlawful conduct at work and reassurance that exposing wrong doing would not pose any risk to the whistle-blower.

The whistle blower should however make it clear that they are making their disclosure within the scope of the whistleblowing policy in order to ensure that the recipient of the disclosure conducts the investigation within the ambit of the policy and more importantly, protect the identity of the whistle-blower if required.

Whistle blower may raise concerns either by declaration or anonymously through any of the following:

- Formal letter or e-mail to the Managing Director of First Pension Custodian Nigeria Limited or the Head Compliance and Risk.
- Call extension **7849** or **7807**
- Call or Text **08023407776**
- Electronically log on to [www.firstpensioncustodian.com](http://www.firstpensioncustodian.com) and click on the whistleblowing portal to report the misconduct.
- To the National Pension Commission: [complaints@pencom.gov.ng](mailto:complaints@pencom.gov.ng)

If the concern affects the Head Compliance and Risk, the Managing Director must be notified, and where such issues affect Managing Director or particular Director such concern shall be referred to the Chairman, Board of Directors. If the concern affects the full Board of Directors and/ or the Chairman, such concern shall be reported to the National Pension Commission (PenCom).

Changes to any of the details above would be promptly communicated to all stakeholders through the approved channels after which the policy would be amended accordingly.