



TRINIDAD AND TOBAGO INSURANCE LIMITED

WHISTLEBLOWING POLICY & PROCEDURES

V1.2

Change Record

Date	Author	Version	Change Reference
11/03/22	J. Dalton-Brown/ S. Parsad	1.0	ORIGINAL
Date Approved by Board of Directors: 22/03/22			
23/05/22	S. Parsad	1.1	Section 8.0 amended
Date Approved by Board of Directors: 31/05/22			
12/01/23	S. Parsad	1.2	Amended due to change in process for greater oversight by Internal Audit
Date Approved by Board of Directors: 07/02/24			

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1.0 Policy Statement

Trinidad and Tobago Insurance Limited (the Company) is committed to conducting its business with honesty and integrity at all times. If, at any time, this commitment is not respected or appears to be in question, the Company will endeavour to identify and remedy such situations. Therefore, it is the Company's policy to ensure that when a person has reasonable grounds to believe that an employee, manager or any other person related to the Company (internally or externally) has committed, or is about to commit an offence that could harm the Company's business and/or reputation or where such actions violate the rights of any individual, these actions should be reported as denounced.

This Policy has been put in place to:

- Encourage employees, independent consultants, business partners, managers and even the public, to disclose information or behaviour relating to action(s) or omission(s) that could reasonably harm the Company's business and/or reputation or could violate the rights of any individual;
- Protect Whistleblowers from reprisals;
- Treat all parties to an investigation in a fair and equitable manner;
- Ensure confidentiality as far as possible; and
- Take corrective and disciplinary action if wrongdoing is discovered.
- To implement controls to reduce likelihood of recurrence

2.0 Purpose & Scope

The purpose of this Whistleblowing Policy is to encourage current and former employees, contractual third parties, business partners, customers and members of the public to communicate events that raise serious concerns about the Company and connected parties. The Company encourages and will support persons who report illegal practices or individuals who violate the Company's policies.

3.0 Duty to Report Misconduct (Whistle blow)

It is the duty of all employees, contractual third parties, or business partners to report misconduct or suspected misconduct, including fraud and financial impropriety. This includes misconduct such as but not limited to:

- Providing false or misleading information, or withholding material information on the Company's financial statements, accounting or auditing or other financial reporting fraud or misrepresentation;
- The pursuit of material benefit or advantage in violation of the Company's Conflict of Interest Policy, Code of Conduct or Anti-Fraud Policy;
- Misappropriation or misuse of the Company's resources such as funds, assets or supplies;
- The unauthorized alteration or manipulation of computer files and Company data;
- Destroying, altering, mutilating, concealing, covering up, falsifying or making a false entry in any records that may be connected to any legal proceedings or where otherwise be the subject of an internal investigation;
- Violations of Company policies that could also result in fines or penalties for violations of legislation, regulations or Central Bank of Trinidad and Tobago guidelines;
- Unethical business conduct in violation of the Company's policies including the Code of Conduct;
- Causing a danger to the health, safety and/or well-being of employees or the general public;
- Forgery or alteration of documents;
- Authorizing or receiving compensation for hours not worked;
- Authorizing or receiving compensation for goods not received or services not performed, or paying for services or goods that are not rendered or delivered;
- Self-dealing or otherwise obtaining an unlawful private benefit (e.g. using Company's assets for personal gain).
- Misrepresentation of facts to the detriment of others or for unwarranted self-gain.
- Altering of client data without proper authorization.

This policy is not designed to deal with general employment grievances and complaints, which should be reported to the relevant line Manager or Human Resources Officer.

4.0 Acting in Good Faith

Any person who files a complaint alleging misconduct must act in good faith and have reasonable grounds to believe that the information disclosed, indicates wrongdoing.

No person who files a complaint in good faith, will be subject to retaliation. Retaliation is any direct or indirect harmful action that threatens a person or is taken against a person who has reported an action, omission or event. Anyone who retaliates against a person who has made a report in good faith shall be subject to disciplinary action up to and including dismissal.

However, making allegations that are deemed unfounded and malicious or knowingly false may lead to disciplinary action being taken against the whistleblower.

5.0 Reporting Procedure

A complaint may be submitted via any of the following methods:

- Submitting an anonymous or signed complaint in writing to the Compliance Officer, indicating:
 - The description of the offence
 - Date of the offence (if known)
 - The date on which the Whistleblower became aware of the offence
 - The name(s) of the person(s) suspected of the offence(s)
 - Any actions taken (if applicable) before filing the complaint or allegation (e.g. having spoken to a Supervisor)
- Submitting a complaint to the following email address: compliance@tatil.co.tt
- Submitting a complaint via Ansa McAL Limited's online Ethix360 platform which can be accessed via the following link: <https://ansamcalspeakout.ethix360.com>

- Lodging a verbal report via the fraud/whistleblowing hotline at (868) 235-6888¹ or via Ansa McAL Limited's whistleblowing hotline at (868) 224-5898 or (844) 540-2345²

The Compliance Officer will acknowledge receipt within two (2) business days when a name and contact details have been provided.

The Compliance Officer, Corporate Secretary and General Manager (Protection Officers) are tasked with the responsibility of protecting and safeguarding the interests of Whistleblowers. A "Whistleblower" is a person, being an employee, manager, director, contractor, customer or other member of the public who is apprehensive about raising their concern because of fear of possible adverse repercussions in relation to reportable misconducts, and who have made a report in accordance with this Policy.

Whistleblowers may wish to discuss the matter informally with their direct supervisor or manager to determine whether an incident reportable under this Policy has occurred. At all times, discussions will remain confidential. Where this is not appropriate or the Whistleblower does not feel comfortable in doing so, they may contact the Compliance Officer or any other Protection Officer directly.

Whistleblowers will not be dismissed, demoted, suspended, threatened, harassed, or otherwise discriminated against because of the communication of a genuine concern. Any employee of the Company who contravenes this Policy when dealing with a Whistleblower may be terminated. Similarly, any member of the Board of Directors who violates this Policy in his/her dealings with a Whistleblower may have his/her relationship with the Company terminated.

A person is not required to prove the truth of an allegation but is required to act in good faith and provide sufficient evidence to the person contacted to demonstrate that there are sufficient grounds for concern. The extent of contact between the Whistleblowers and investigative body will depend on the nature of the complaint and clarity of the information provided.

All complaints will be treated in a confidential and sensitive manner. In addition, the identity of the whistleblower must be kept anonymous, except in certain cases where the nature of the complaint or resulting investigation makes it necessary to disclose his/her identity. In such cases, all reasonable measures will be taken to protect the whistleblower from any prejudice resulting from disclosure.

¹ This phone number will be tagged to the Compliance Officers at TATIL and TATIL LIFE. After a certain number of rings and if still unanswered, the call will be transferred from the Compliance Officers to the Head of Internal Audit, FSS.

² For calls outside of Trinidad and Tobago.

6.0 Investigation

All reports of misconduct will be treated seriously and be the subject of a thorough investigation with the objective of locating evidence that either substantiates or refutes the claims/allegations made by the Whistleblower. All relevant cases will be reviewed and analysed by a competent person designated by the General Manager, on a case-by-case basis, depending on the nature of the report. In some cases this may involve an investigation by a specialist e.g. accountant or legal adviser.

All investigations will be kept confidential to the extent this is possible. Appropriate corrective action will be taken if necessary, and the findings will be communicated to the Whistleblower.

Following a report of misconduct, either internally or externally, the following procedure is to be followed:

1. The Protection Officers shall review the whistleblowing report, a copy of which must be shared with Internal Audit.
2. The General Manager in consultation with the other Protection Officers and Head of Internal Audit, shall appoint an Investigating Officer to investigate the complaint. The Investigating Officer is responsible for planning and conducting the investigation.
3. The Investigating Officer is required to review the report and determine the appropriate manner of investigation, The Investigating Officer is also required to determine what resources are needed, as well as secure access to those resources once approved by the General Manager. Where necessary, this may include the assistance of other employees, Internal Audit or external professional help (including lawyers, accountants or forensic analysts). Where the Investigating Officer requires additional information from the Whistleblower, such requests shall be channeled via the Protection Officers, to maintain the anonymity of the Whistleblower.
4. The Investigating Officer prepares an investigation report documenting the investigative findings and forwards the report to the Protection Officers. Such report may include recommendations for further handling.
5. The General Manager is responsible for sharing a copy of the investigation findings with Internal Audit, and discussing the need for further handling e.g. tightening of controls, inclusion in future audit scopes, etc.
6. The Protection Officer(s) advise(s) and debriefs the Whistleblower.

7.0 Reporting on Findings

At the end of the investigation, the Investigating Officer will report findings to the Protection Officers, who will determine the appropriate response. This response will include addressing any unacceptable conduct and taking remedial action required to prevent any future occurrences of the same misconduct.

Where issues of discipline arise, the response will be in line with Human Resources and Industrial Relations procedures. Where allegations of unacceptable conduct made against another person cannot be substantiated, that person will be advised accordingly and will be entitled to continue in their role as if the allegations had not been made.

8.0 Management Reporting

Based on the severity of the Complaint, the GM may escalate the issue to the Managing Director (MD). The MD, at his discretion may inform the Board of the nature of the Complaint while withholding the details of the names of all persons involved. Once the investigation has been completed, the MD as part of the monthly Board reporting requirements, will provide full details (excluding identities of persons where appropriate) of the findings of the investigation, the disciplinary action taken and the nature of any remedial process updates implemented to reduce the likelihood of the event reoccurring.

Any event that involves potential criminal action that needs to be reported to the Trinidad & Tobago Police Service will immediately be escalated to the MD/GM, prior to filing the report. The GM/MD are responsible for making the final decision to file the report. If it is agreed to proceed, the GM/MD are required to notify the Chairman of the Board prior to reporting to the police.

9.0 Record Keeping

All information, documents, records and reports relating to the investigation of a reported misconduct will be confidentially stored and retained in an appropriate and secure manner for a period of six (6) years from the closing of unsubstantiated investigations or incidents that lead to the termination of the employee(s) against whom the report was made. If the investigation does not lead to a termination, but to some lesser form of internal redress/action against the subjects of the investigation, a copy of the report will be kept by Compliance in line with regulatory record keeping requirements.

10.0 Policy Review

The Board is responsible for approving this document as deemed necessary, but at least every three (3) years.