

Code of Conduct & Ethics

CODE OF CONDUCT & ETHICS

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OVERVIEW OF THIS CODE

Hong Leong MSIG Takaful's (HLMT) mission is to be a leading takaful provider for all, driven by operational excellence and core values. As such, HLMT commits to a high standard of professionalism and ethics in the conduct of our business and professional activities as set out in this Code of Conduct & Ethics ("**Code**").

This Code applies to:

- All colleagues who work in HLMT across the jurisdictions in which we operate – including but not limited to permanent, part-time and temporary employees;
- Any other persons permitted to perform duties or functions within HLMT – including but not limited to contractors, secondees, interns, industrial attachment and agency staff.

You are responsible for fully understanding and complying with the Code. You are required to undertake training and provide an affirmation that you have read, fully understood and will comply with the Code, annually.

The Code also forms part of the terms and conditions of employment/engagement with HLMT. Any failure to comply with this Code, or any HLMT policies relevant to your role, will be treated very seriously by HLMT. Such failure shall constitute misconduct and may result in disciplinary action, up to and including termination of employment (for colleagues) or termination of your relationship with HLMT (for contractors and others).

Employees at branches are expected to know and comply with the laws, regulations and Codes of Conduct that apply in that jurisdiction. In cases where local laws and/or regulations prescribe different requirements, the stricter of the requirements shall apply.

There are six (6) key principles to HLMT's Code of Conduct & Ethics:

- COMPETENCE
- INTEGRITY
- FAIRNESS
- CONFIDENTIALITY
- OBJECTIVITY
- ENVIRONMENT

OVERVIEW OF THIS CODE: IMPORTANT FURTHER READING

- Financial Services Professionalism Board (FSPB) Code of Ethics
- Islamic Financial Services Act 2013

PRINCIPLE 1: COMPETENCE

HLMT is committed to ensuring that its employees develop and maintain the relevant knowledge, skills and behaviour to ensure that our activities are conducted professionally and proficiently.

Continuous Professional Development and Training

As an employee, you must help ensure that HLMT meets its legal, compliance and regulatory obligations, as well as stakeholder and customer expectations, by possessing and maintaining the skills and knowledge needed to perform your role. To do so, you must:

ATTAIN COMPETENCE	MAINTAIN COMPETENCE
<ul style="list-style-type: none">• Ensure you meet competency standards of HLMT and its regulators;• Carry out your duties and responsibilities competently;• Seek help from your line managers or from HR to fill in any gaps in skill, knowledge or expertise;• Ensure you understand the steps to be taken to achieve competence.	<ul style="list-style-type: none">• Keep up to date with the job requirements at least annually;• Continuously learn and improve your skills, knowledge and expertise;• Proactively keep abreast with changes in law, regulation and industry best practice.

Multiple training channels are in place to enable easy access for employees to be up-skilled. You are to ensure that you complete the mandatory trainings programmes within the stipulated time frame. Allowing a colleague to complete your training or sharing answers to help a colleague is strictly forbidden.

If the performance of your role requires you to maintain a professional license or industry accreditation, you must ensure that you complete all necessary associated training and examinations within the required timeframe.

Personal Declarations on Legal and Regulatory Proceedings, Fitness and Propriety

HLMT continuously assesses employees to ensure their suitability for the roles they perform.

You must promptly declare to the Human Resources (HR) Division any criminal, legal or regulatory proceedings in which you are involved, whether or not the proceedings relate to HLMT, including:

- Any arrest, charge, conviction or legal proceeding relating to a criminal charge including unresolved criminal charges, however minor;
- Any inquiry or action by a financial institution regulator, law enforcement agency or similar authority;
- Any legal claims against you relating to fraud, dishonesty, or unfair or unethical conduct committed by you.

You do not need to declare minor traffic offences. If you have questions on whether you need to declare a criminal, legal or regulatory proceeding, contact the HR Division.

Where an employee is identified to hold a position of key responsibility, HLMT is required to assess their fitness and propriety prior to appointment and at regular intervals thereafter, based on criteria relating to:

- Probity, personal integrity and reputation
- Competence and capability
- Financial integrity

If you have been identified as an employee holding a position of key responsibility, requiring a 'fit and proper' declaration and assessment, you must notify the Head of HR without delay of any information that may materially compromise your fitness and propriety.

Compliance with Laws and Regulations

HLMT operates in a highly regulated environment. You must comply at all times with all applicable laws, regulations and regulatory requirements, and be open and transparent with regulators. You must fully cooperate with, and provide accurate information for, any internal or external investigations.

Additionally, you are responsible for fully understanding and ensuring compliance with legal or regulatory requirements which are specific to your role.

Violations of the Code or any laws, regulations, or regulatory requirements that apply to HLMT may result in disciplinary action up to and including dismissal. Misconduct that will result in disciplinary actions also includes:

- Violating or asking others to violate the Code;
- Failing to raise a known or suspected violation of the Code;
- Retaliating against another employee for raising a concern in good faith or for participating in an investigation.

Where appropriate or where required to do so, HLMT may also:

- Seek remedies in a civil court including but not limited to monetary damages and/or a court order prohibiting an individual from continuing to violate the Code or any laws, regulations, or regulatory requirements that apply to HLMT;
- Report such violation to the police and/or regulators, which may result in criminal liabilities and/or penalties;
- Report such violation in employment records databases maintained by regulatory authorities and/or industry bodies which may be referred to by future employers during the employment process.

Compliance with Islamic Financial Services Act 2013 and Shariah Governance Framework

HLMT places great importance in ensuring the Islamic financial systems operates in accordance with IFSA 2013, Shariah Governance Framework or any other relevant policies/guidelines.

You are required to promptly report any known or suspected Shariah non-compliance.

Maintaining Vigilance Against Financial Crime

Globally, criminals increasingly target financial institutions' products and systems as a conduit to launder proceeds of crime, finance terrorism, commit fraud and by pass national and international sanctions. If you fail to comply with anti-money laundering, counter-terrorist financing and sanctions laws, you and HLMT may be subject to severe penalties including large fines and imprisonment.

You must never cause HLMT to commence or continue a relationship with a person whom you know or suspect to be carrying out a financial crime. You must file an internal suspicious transaction report immediately where such knowledge or suspicion arises.

COMPETENCE: IMPORTANT FURTHER READING

Key Group Policies relating to compliance with important laws and regulations which you must comply with at all times include:

- Compliance Policy
- BNM's Fit and Proper Criteria
- Islamic Financial Services Act 2013
- BNM's Shariah Governance Framework

PRINCIPLE 2: INTEGRITY

HLMT's Vision, Mission and Values identifies a strong values-based culture to guide decisions, actions and interactions with stakeholders as a key enabler for success.

General Conduct

Each of us has a responsibility to uphold the Code and as an employee of HLMT, we have a duty to demonstrate the highest standards of business conduct by doing the right thing.

HLMT relies on you to practice sound decision-making and take actions that will preserve a strong values-based culture in the workplace. You are responsible for your decisions and must not engage in unethical or illegal conduct, even where you are acting on the instructions of another colleague. If you are ever unsure of the proper course of action, you should seek advice from your manager, Head of Department, Head of Compliance or HR manager.

Personal appearance can contribute to HLMT's image and reputation. You are expected to present a neat and professional appearance at all times during work hours. You must dress in attire that is appropriate for a workplace and work-related activities, observing local dress codes (including wearing uniforms) where applicable.

You must attend work punctually, adhering to HLMT's working days, official working hours and break times. Any incidents of irregular attendance and/or lack of punctuality will result in disciplinary action. In the event of any emergency resulting in absence or non-adherence to official working hours, you must inform and obtain the approval of your immediate superior as soon as possible, without delay. As an employee, you shall be deemed to have unilaterally broken your employment contract if you are continuously absent from work for more than two (2) consecutive working days without prior leave approved from HLMT and without any reasonable excuse.

Examples of behaviour that could be seen as lacking punctuality include leaving early for lunch and/or coming late after lunch and coming late for work and/or leaving early from work without the prior approval of your supervisor or manager.

Misuse of Information

You are prohibited from using material, non-public information about HLMT, our customers or other companies that conduct business with us to gain a direct or indirect advantage for yourself or any other person.

You must not deal in the securities of any company listed or pending listing on a stock exchange at any time when you are in possession of information which you know, or reasonably ought to know, is inside information. In addition to a breach of the Code, such dealing may also constitute a criminal offence.

'Inside information' is information which is not generally available to the public and which, if made generally available, a reasonable person would expect to have a material effect on the price or value of the securities.

'Dealing' includes acting as principal or agent, in acquiring or disposing (or agreeing to acquire or dispose) such securities. Procuring or inducing another person to deal is also prohibited.

Integrity of Records and Information

Record keeping policies and controls are essential to the successful operation of HLMT and our ability to meet our legal and business obligations. Each of us is responsible for being accurate, complete and honest in HLMT's records and for complying with all of the record keeping policies, controls and procedures we have in place.

You must never falsify any book, record or account that relates to the business of HLMT, customers, employees, suppliers or our assets. This means being honest and accurate in all aspects of your job, including entries you make on expense reports, timekeeping records, results you record on sales incentive plans and claims you make under our employee benefit plans.

Accounting records and reports must be complete and accurate. You must never make entries or allow entries to be made for any account, reports, records or documents that are false or would obscure the true nature of the transaction, as well as to mislead the true authorisation limits or approval by the relevant authority of such transactions.

Personal Finances

As an employee, any improper handling of your personal finances could undermine your credibility and the reputation of HLMT. It could also cause others to question your decision-making on the job or task that you are handling. Therefore, you must handle your personal finances responsibly, with integrity, and in compliance with all relevant laws and regulations and with any product terms and conditions which you have agreed. You must not promote or participate in illegal financing schemes, tontine schemes (kootu funds) and otherwise carry on illegal activities for your own personal gain or the gain of others.

HLMT reserves the right to carry out checks of an employee's past as well as present financial activities and patterns. Where an employee fails to fulfil his financial obligations as and when they fall due or has been the subject of a judgement debt which is unsatisfied, either in whole or in part, HLMT may take appropriate action, including:

- i. Removing the employee from certain positions or roles, e.g. position of authority, cash handling, etc.;
- ii. Termination of employment if the employee is declared bankrupt and is no longer suitable to be employed by HLMT.

An employee's career advancement may also be impacted as a result of his poor financial standing such as his promotion being withheld.

HLMT's Assets

Our assets are the resources we use to conduct our business. You are to use HLMT's assets for legitimate business and appropriately safeguard them including against cyber-related attack, theft, loss, waste or abuse.

Our assets include:

- i. Physical assets, such as office furnishings, cars, equipment and supplies;
- ii. Technology assets, such as laptops, tablets, computer hardware, software and information systems;
- iii. Financial assets, such as cash; and
- iv. Information assets, such as Intellectual property, including information about products, services, systems and other data.

HLMT monitors how you use our assets, including email and internet, as permitted by law and regulation, to detect misconduct.

Reporting Illegal or Unethical Acts

You must speak up if you witness or if you are improperly instructed to carry out illegal or unethical act, including wrongdoing by third parties (such as customers, vendors or business partners).

You are required to promptly report any known or suspected violations of the Code, HLMT policy or any law, regulation or regulatory requirements applicable to our business. Reporting is required whether or not you are involved in the violation. Just as you will be held responsible for your own actions, you can also be held responsible for failing to report the actions of others if you knew or should reasonably have known that they were in violation of any applicable policy, law, regulation or regulatory requirements.

Your report will be handled discreetly and shared where necessary, for example with persons who are involved in investigating, resolving, or remediating the issue. If you have concerns about possible retaliatory action, you may lodge a report to the Head of HR or through HLMT's Whistleblowing channels.

Critical Incident Reporting

It is the responsibility of an employee who encounters a Critical Incident i.e. financial, legal, reputational or operational risk to immediately notify the superiors and functional reporting heads for prompt communication to Senior Management of HLMT. This is to enable HLMT to manage the situation appropriately in order to mitigate any risk posed to HLMT.

INTEGRITY: IMPORTANT FURTHER READING

- HLMT Whistleblowing Policy
- BNM Reporting under **ORION**
- Guidelines : Company Dress Code

PRINCIPLE 3: FAIRNESS

A core mission of HLMT is to help clients succeed through simple, relevant, personal and fair takaful. We must act responsibly and be fair and transparent in our business practices, including treating our colleagues, customers and business partners with respect. We must consider the impact of our decisions and actions to all stakeholders.

Fiduciary Duties

You have a duty to act in the best interest of HLMT and its customers.

You have a duty to act with integrity, conducting yourself in an open, honest and accountable manner and avoiding any acts that might damage the reputation of HLMT. At all times, you must:

- i. Comply with applicable laws and regulatory requirements regarding consumer protection;
- ii. Fully embrace the principle of treating consumers fairly in carrying out your role;
- iii. Ensure that promotion and marketing method is fair, clear and not misleading;
- iv. Bear in mind the financial literacy of the target group of your sales and marketing efforts;
- v. Obtain or confirm information about the needs of the customer;
- vi. Ensure that any product and/or service offered is suitable to fulfil the needs of the customer;
- vii. Ensure that any of our Islamic product and/or service offered is Shariah compliant and suitable to fulfil the needs of the customer;
- viii. Be transparent in the provision of information about a product and/or service, including its features, risks and rewards;
- ix. Give customers equal access to such information; and
- x. Take customer complaints seriously.

In conducting your work with integrity, you must:-

- i. Not take unfair advantage of anyone through manipulation, concealment, abuse of confidential information, misrepresentation of material facts, or other unfair dealings or practices; and
- ii. Comply with all relevant laws and regulations that specifically prohibit discrimination against current or prospective customers and business partners on the basis of race, sex, religion, or other non-risk factors.

PRINCIPLE 4: CONFIDENTIALITY

HLMT is committed to providing a safe, reliable and secured takaful experience for our customers.

Protecting Customer and HLMT's Confidential Information

Our customers and business partners trust us to protect their confidential information, whether that information relates to financial, personal or business matters. Confidential information can be written, oral or electronic and includes a wide variety of data – including but not limited to technology applications, business strategies, customer lists, credit procedures, customer and personnel information.

In the course of, or after cessation of your employment/engagement, you must not disclose or misuse customer or HLMT's confidential information, whether or not for personal financial gain. You have a duty to protect such confidential information and to take precautions before sharing it with anyone, inside or outside the workplace:

- i. Do not share confidential information with friends or family, or with colleagues who are not authorised to receive such information;
- ii. Do not discuss confidential information in public or common places where others can hear you (corridors, lift, lobby etc);
- iii. Do not access or use confidential information for unauthorised purposes;
- iv. Do not widely circulate confidential information, in internal mass postings, or outside HLMT (including to your own personal email address), unless permitted to do so under applicable law, regulations and internal policy or procedures;
- v. Collect confidential papers immediately from printers, photocopiers and fax machines;
- vi. Be vigilant about whether your computer screen or papers can be read by someone else;
- vii. Use passwords and regularly change passwords. Do not share your passwords with anyone;
- viii. Ensure hard copy confidential information is stored in locked cabinets and soft copies securely stored; and
- ix. Shred any documents containing confidential information when they are no longer needed.

The duty of confidentiality is both a legal and ethical obligation. Laws concerning confidentiality, particularly the Personal Data Protection Act 2010 (PDPA), must be strictly adhered to.

“Clean Desk” Policy

HLMT practices and enforces a “Clean Desk” policy. This means that all employees are responsible for clearing their desks of any confidential information when they leave the office.

Laptops should be secured in place. Documents, especially those with confidential or sensitive information, must be stored securely and appropriately.

Disposal or Return of Confidential Information

Disposal of confidential information must be done in a way that protects the confidentiality of the information. Paper records must be shredded and storage media must be formatted in a way that ensures that third parties or unauthorised persons cannot access the information.

HLMT provides storage, paper shredders and sealed bins for employee usage.

Press Releases, Public Statements, Appearances and Appointments

Unless with prior written approval from GMD, you must not to make any (oral, written or other) public statement, regarding HLMT’s confidential and/or proprietary information. This includes our internal policies, financial information, internal affairs or corporate affairs, or any statement containing or relating to HLMT’s confidential information.

In case of matters concerning HLMT, only GMD, IGP and Chairman are authorised to make or release any statements on HLMT to the media or the public, provided that they are for the purpose of communicating sales, marketing, customer services or public relationship and related information. Senior executives, may make or release such statements, only where they have obtained explicit prior approval from GMD, IGP or Chairman.

You must promptly inform GMD or the Corporate Communication Department if you are approached by a member of the media to comment on any matter pertaining to HLMT.

Unless with prior written approval from GMD, you must not:

- i. Accept offers for media exposure for the promotion of self or self-interests;
- ii. Participate as a speaker in any talks, seminars, conferences.
- iii. Accept appointments to councils, committees or boards for any associations, governmental or non-governmental organisations, societies etc. in your capacity as a HLMT employee. For appointments in your personal capacity, please read carefully the section on Conflict of Interest.

When in doubt, you must consult and seek approval from the Corporate Communication Department.

Social Media Usage

You must use good judgment in the use of social media and other online activity. Be mindful not to disclose confidential and/or proprietary information. Do not post or seek posting of confidential information or information which could cause reputational damage regarding HLMT, colleagues, customers or business partners (e.g. vendors) of HLMT.

Such restricted postings include referrals, recommendations, material subject to intellectual property rights, photos, videos, etc. Information that might damage the reputation of HLMT is not to be posted or disseminated and should be reported to Corporate Communication Department, should you become aware of such information.

CONFIDENTIALITY: IMPORTANT FURTHER READING

- Privacy Policy
- IT Security Policy
- Media and Public Relation Policy

PRINCIPLE 5: OBJECTIVITY

You must not allow any conflict of interest, bias or undue influence of others to override your business and professional judgment. You must not be influenced by friendship or association in performing your role. Decisions must be made on a strictly arms-length business basis.

Conflict of Interest

You must not engage directly or indirectly in any personal or business activity that competes or conflicts with the interest of HLMT:

i. Other Business Interests and Employment

Conducting any non-HLMT paid or unpaid employment or business activity (including acquiring another business) without the approval of HLMT is prohibited.

You must not undertake paid or unpaid employment or other business activities outside of HLMT's working hours unless you have prior written approval from the HR Division.

Approval shall be granted only where the interests of HLMT will not be prejudiced.

If you have a financial interest in a customer – for example as a sole proprietor, partner, shareholder, creditor or debtor – such an interest must be disclosed immediately to the HR Division. You must not be directly involved in HLMT's dealings with the customer so long as the interest continues to exist.

ii. Corporate Directorships

You must not serve as a director of a legal entity without approval from HLMT's Board of Directors.

iii. Trusteeships

You may only accept an appointment as an executor, administrator or trustee of customers' estates if you have prior written approval from the HR Division. If such an appointment is made without your knowledge, you must notify the HR Division without delay to obtain their approval to retain such appointment once you become aware. Such approval shall not be unreasonably withheld.

iv. Working with Relatives

Colleagues should not work with their immediate family members (i.e. spouses, parents, siblings or children), or another colleague with whom they have a personal relationship, in the same Division/Department/Branch and/or in a position of direct subordination or supervision. You must promptly declare any such situations to the HR Division. HLMT has the right to take all necessary steps to ensure any element of conflict is removed, including requiring the transfer of affected colleagues.

When in doubt about any potential situation of conflict, you must consult the HR Division.

Misuse of Position

You must not use your position to influence other employees, current and potential customers or business partners of HLMT to act in your personal interest or in the interest of anyone other than themselves and HLMT. For the avoidance of doubt, you are prohibited from using or allowing the use of HLMT's name or facilities, your position and/or connection with HLMT:

- i. To gain personal advantage for yourself or for others, including in political, investment or other activities;
- ii. To gain preferential treatment for yourself or for others, such as in purchasing goods, securities and in obtaining loans;
- iii. For speculative activities in commodities (gold, silver etc.), foreign exchange or securities, whether acting personally or on behalf of another; and
- iv. To engage employees of other financial institutions in unethical and/or prohibited arrangements for personal or mutual gain, e.g. approving an takaful policy in return for a personal benefit, bypassing relevant policies and procedures.

You must not enter into prohibited transactions through nominees. Immediate family members (i.e. spouses, parents, siblings or children) are presumed to be nominees.

Anti-bribery and Corruption, Gifts and Entertainment

You must at all times comply with local anti-bribery and corruption laws and regulations. In Malaysia, the main legislation is the Malaysian Anti-Corruption Commission Act 2009. Severe penalties, including heavy fines and imprisonment, can be applied to any person found guilty of bribery or corruption.

In the normal course of your employment, giving and receiving gifts and entertainment can legitimately facilitate the building of goodwill in your business relationships. However, inappropriate or excessive gifts or entertainment (whether offered or received by you) can amount to, or give the impression of, bribery, corruption or other improper influence.

You are strictly prohibited from giving or receiving a gift or entertainment which is, or which appears to be inappropriate or excessive, taking into account all relevant facts and circumstances.

You must promptly declare any gift or entertainment which you (or others on your behalf) give or receive. For any gifts or entertainment with a value above RM500, prior approval is required. The detailed requirements which you must comply with are set out in the Gifts and Entertainment Procedures.

OBJECTIVITY: IMPORTANT FURTHER READING

- Gifts and Entertainment Procedures
- Procurement Policy

PRINCIPLE 6: ENVIRONMENT

Safe Workplace

A safe and healthy workplace is important to the wellbeing of every employee. We rely on you to comply with applicable laws such as the Occupational Safety and Health Act 1994 and HLMT's policies as they relate to ensuring the health, safety and security of our workforce, our customers and others who may be present on our premises.

We are committed to a non-violent working environment, free of threats, intimidation and physical harm. Any acts or threats of violence towards another person or HLMT's property should be reported immediately. The unauthorised possession or use of weapons, or menacing references to weapons, while at work, on HLMT's property or while on HLMT's business or during HLMT-sponsored events, is also prohibited.

We work in an industry where the threat of criminal activity is real. Practice good physical security habits and be alert to ensure the safety of co-workers and customers. Don't allow unauthorised individuals into secure areas. Anyone asking to make a delivery or provide a service should be able to show valid identification, which should indicate, where appropriate, their affiliation with the organisation they represent. We rely on you to promptly report any criminal activity or situations that could pose a threat to you or to others.

You are to always practice the following:

- i. If you become aware of any actual or potential health or safety hazard, report it immediately to your manager;
- ii. Any accidents at work involving injury or damage must be reported immediately to your Manager; and
- iii. Always maintain a clean, hazard free and healthy environment by keeping passageways clear, stack and store.

Diversity and Inclusion

HLMT employs/engages people from a variety of backgrounds and origin, experience and culture. Discrimination of any kind is strictly prohibited, including any discrimination of race, colour, nationality, ancestry, citizenship status, creed, religion, age, gender, pregnancy, maternity, marital status, or physical disability.

You must not, at any time, engage in, or support acts of harassment or inappropriate or abusive conduct by or against our employees, customers or business partners. Examples of unacceptable conduct include unwelcome jokes, threats, physical contact, derogatory comments, teasing, bullying, intimidation or other offensive or abusive language or action.

HLMT will not tolerate discrimination, harassment or intimidation and will take all allegations seriously. It is the responsibility of every colleague to report any behaviour that is unlawful, abusive or otherwise violates this Code.

Sustainability

HLMT is committed to reduce the effect of our operations on the environment so that we are able to build our franchise in a safe and healthy environment. We aim to do this by managing the resources we use across HLMT and raising staff awareness about the importance of caring for the environment. HLMT will be mindful of its activities with employees, business partners and the community we operate within to ensure human rights are safeguarded. Where there are adverse impacts, we are committed to addressing these.

Drug-free Workplace and Alcohol Consumption

You must not sell, manufacture, distribute, possess, use or be under the influence of illegal drugs in the workplace or while performing work related duties.

You must not consume alcohol at any time during the working day, and/or at a HLMT-sanctioned event.

Office

The primary purpose of an office is to support you in performing your job and you are reminded to always be mindful and sensitive in your actions and words at the office. HLMT prohibits you from:-

- i. Carrying out personal activities such as promoting religious or political beliefs amongst co-workers;
- ii. Carrying out political campaigns at the office; and
- iii. Performing prayer ritual at places other than prayer room without the prior approval of the HR Division.

ENVIRONMENT: IMPORTANT FURTHER READING

- Occupational Health and Safety Act 1994

Miscellaneous

The following words shall have the meanings shown:

“**BNM**” shall mean Bank Negara Malaysia

“**FSPB**” shall mean Financial Services Professional Board

“**Chairman**” shall mean Chairman of Hong Leong MSIG Takaful Berhad

“**IGP**” shall mean Intermediate Group President

“**GMD**” shall mean Group Managing Director of Hong Leong Assurance Berhad

“**HLMT**” shall mean Hong Leong MSIG Takaful Berhad, including branches