

WHISTLEBLOWING POLICY

Version Control Table

Version	Date	Change Reference
1.0	18 January 2017	First Issuance
2.0	23 November 2017	Revised
3.0	22 October 2018	Revised
4.0	23 January 2019	Revised
5.0	21 November 2019	Revised, with the following change: b. Where the Whistleblower report names or implicates the Chief Internal Auditor, the Retained Document shall be filed and retained by the person appointed by the Chairman of GBAC.
6.0	21 April 2020	Revised, with the following change: 1. Who can raise concerns? • Any (legal or natural) person including those providing services to, or having a business relationship with HLM Takaful
7.0	5 November 2020	Revised, with the following changes: 1. Updated to align with prescribed policy format in the Documentation Policy. 2. Add Policy Statement. 3. Extend application of policy to directors. 4. Expand on list of types of genuine concerns that may be raised 5. Limit HLM Takaful whistleblowing channel to genuine concerns raised relating to Improper Conduct in HLM Takaful only. Genuine concerns that relate to Improper Conduct concerning the designated recipient of a whistleblowing report in HLM Takaful, such genuine concern may be raised through Hong Leong Financial Group (“HLFG”)’s whistleblowing channel. 6. Provide situations where whistleblowing protection may be revoked. 7. Provide for disclosure of whistleblowers personal information where required. 8. Provide for whistleblower’s involvement in investigation where required. 9. Updated Whistleblower form.

1. Purpose

To provide an avenue for employees of Hong Leong MSIG Takaful Berhad (“HLM Takaful”) and any other person to raise genuine concerns about any improper conduct or wrongful act (“Improper Conduct”) occurring in HLM Takaful through HLM Takaful’s whistleblowing channel on a confidential basis.

2. Scope

The following persons may raise any genuine concerns about any Improper Conduct vide HLM Takaful’s whistleblowing channel:

- (a) Any employee or director of HLM Takaful; and
- (b) Any (legal or natural) person, including those providing services to, or having a business relationship with, HLM Takaful.

3. Policy Statement

HLM Takaful is committed to good business ethics and integrity as set out in HLM Takaful’s Code of Conduct and Ethics. All employees are encouraged to raise genuine concerns about Improper Conduct occurring in HLM Takaful at the earliest opportunity, and in an appropriate way, through available channels under this Whistleblowing Policy or HLM Takaful’s Compliance Policy.

4. Types of Concerns That May Be Raised

4.1 You should raise any genuine concerns about any Improper Conduct occurring within HLM Takaful and/or that may adversely impact HLM Takaful, including but not limited to:

- Any criminal offences, including fraud, corruption, bribery and blackmail;
- Any failure to comply with legal or regulatory obligations;
- Any improper conduct which would be a disciplinary offence; and
- Any gross mismanagement of company affairs.

4.2 Please note that any grievance of a personal nature or that related to your employment should be raised through HR grievance procedures and not through this Whistleblowing Policy or the Whistleblower Form.

4.3 Any genuine concerns on Improper Conduct occurring in and / or affecting HLM Takaful shall be raised vide the respective

whistleblowing channels in HLM Takaful. However, where the genuine concern relates to Improper Conduct concerning the designated recipient of a whistleblowing report in HLM Takaful, such genuine concern may be raised through Hong Leong Financial Group (“HLFG”)’s whistleblowing channel.

5. Who To Raise Concerns To

Reports of any such genuine concerns may be made to:

Chairman, Group Board Audit Committee,
Hong Leong MSIG Takaful Berhad,
Level 5, Tower B, PJ City Development,
No.15A, Jalan 219, Seksyen 51A,
46100 Petaling Jaya, Selangor Darul Ehsan.
Email: whistleblowing-hlah@hla.hongleong.com.my

The following persons shall have access to the email address:

- i. Chairman of the Group Board Audit Committee (“GBAC”);
- ii. Chairman of the Group Board Risk Management Committee (“GBRMC”);
- and
- iii. Chairman of HLAH

Where the Whistleblower report names or implicates the Chief Internal Auditor, the Retained Document shall be filed and retained by the person appointed by the Chairman of the GBAC.

Please include your full name and contact details, as well as full details of your concern and any supporting documentation you consider relevant. Should you wish to do so, you may use our Whistleblower Form to provide the details required.

HLM Takaful reserves the right not to investigate any alleged Improper Conduct which are raised anonymously.

Additionally, you also have the right to raise your concerns with relevant regulators, such as Bank Negara Malaysia or law enforcement agencies.

6. Actions Which May Be Taken Against You

6.1 Subject to paragraph 6.2 below and to the extent permitted by law, you will be protected from retaliation, adverse employment action or legal action and where feasible, from disclosure of your identity, provided your report is made in good faith (even if you are genuinely mistaken in the concerns you raise).

6.2 Your protection may be revoked and appropriate action may be taken against you if:

- (a) you have participated in the Improper Conduct disclosed;

- (b) you made a material statement which you knew or believed to be false or did not believe to be true;
- (c) the disclosure of the Improper Conduct is frivolous or vexatious;
- (d) the disclosure of the Improper Conduct is made maliciously; or
- (e) the disclosure of the Improper Conduct is made solely or substantially with the motive of avoiding dismissal or other disciplinary action.

7. Disclosure Of Your Personal Information

Please note that we may have to disclose your personal information to the board of directors and investigation team in order to follow up and, if appropriate, act on your complaint, or where required by law or regulatory authorities. Please take note that we may not be able to conduct the investigation or the investigation may be affected if you object to the disclosure of your personal information.

8. Your Involvement In The Investigation

You will only be requested to assist when more information is needed during the investigation of the alleged Improper Conduct.

9. Policy Information

Subordinate Schedules	None
Policy Owner / Administrator	Chief Compliance Officer
Accountable Officer	Head, Internal Audit in respect of: (a) retained documents, save for whistleblowing reports which implicate the Head, Internal Audit; and (b) register of all whistleblowing reports, as set out in the Whistleblowing Standard Operating Procedure.
Responsible Party(s)	All employees of HLM Takaful and any (legal or natural) person providing services to, or having a business relationship with, HLM Takaful.
Summary of Changes	Refer to the Version Control Table
Approved Date	25 November 2020
Effective Date	25 November 2020
Next Review Date	25 November 2021
Relevant Legislation	1. Whistleblower Protection Act 2010 2. Guidelines on Adequate Procedures issued by the Prime Minister's Department pursuant to S17A(5) of Malaysian Anti-Corruption Commission Act 2009 3. Corporate Governance Policy issued by Bank Negara

	<p>Malaysia</p> <p>4. Bursa Main Market Listing Requirements, Chapter 15, Part H, paragraph 15.29</p>																
Related Policies	<p>1. Code of Conduct and Ethics</p> <p>2. Anti-Corruption System Policy</p> <p>3. Compliance Policy</p>																
Related Procedures	<p>1. Whistleblowing Standard Operating Procedure</p> <p>2. Anti-Corruption Standard Operating Procedure</p>																
Related forms, publications and websites	Appendix 1 : Whistleblower Form																
Definitions/ Interpretation that relate to this policy only	<p>“Improper Conduct” has the meaning set out in paragraph 1 and includes the list set out in paragraph 4.1</p> <table border="0"> <thead> <tr> <th><u>Acronym</u></th> <th><u>Long Form</u></th> </tr> </thead> <tbody> <tr> <td>Board</td> <td>Board of Directors</td> </tr> <tr> <td>GBAC</td> <td>Group Board Audit Committee</td> </tr> <tr> <td>GBRMC</td> <td>Group Board Risk Management Committee</td> </tr> <tr> <td>HLAH</td> <td>HLA Holdings Sdn Bhd</td> </tr> <tr> <td>HLFG</td> <td>Hong Leong Financial Group</td> </tr> <tr> <td>HLM Takaful</td> <td>Hong Leong MSIG Takaful</td> </tr> <tr> <td>HR</td> <td>Human Resource</td> </tr> </tbody> </table>	<u>Acronym</u>	<u>Long Form</u>	Board	Board of Directors	GBAC	Group Board Audit Committee	GBRMC	Group Board Risk Management Committee	HLAH	HLA Holdings Sdn Bhd	HLFG	Hong Leong Financial Group	HLM Takaful	Hong Leong MSIG Takaful	HR	Human Resource
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Version No	7.0																
Reviewed and Concurred By	HLM Takaful Executive Committee 5 November 2020																
Endorsed By	<p>HLM Takaful Shariah Committee 10 November 2020</p> <p>HLAH GBRMC 18 November 2020</p>																
Approved By	HLM Takaful Board 25 November 2020																

Appendix 1**WHISTLEBLOWER FORM**

You should raise any genuine concerns about any improper conduct or wrongful act (“Improper Conduct”) that is committed within HLM Takaful. Concerns on your personal position or your employment, should be raised through HR grievance procedures, and not through this Whistleblower Form.

YOUR FULL NAME		
NAME OF YOUR EMPLOYER		
YOUR STAFF ID <i>(if an employee of HLM Takaful)</i>		
YOUR DEPARTMENT		
YOUR POSITION / DESIGNATION		
YOUR CONTACT DETAILS	Address:	Telephone:
		Email:

DETAILS OF YOUR CONCERNS

(please provide as much information as possible)

DESCRIPTION OF IMPROPER CONDUCT:

(use the additional information sheet, if necessary)

WHERE DID THE IMPROPER CONDUCT OCCUR?**WHEN DID THE IMPROPER CONDUCT OCCUR?****NAME AND POSITION OF PERSON(S) INVOLVED:****DETAILS OF ANY WITNESS(ES):****DID YOU REPORT THE IMPROPER CONDUCT TO ANY AUTHORITIES? IF YES,
PLEASE GIVE DETAILS:****SUPPORTING DOCUMENT(S) ATTACHED (Please tick)?** Yes No

ADDITIONAL INFORMATION SHEET**ANY ADDITIONAL INFORMATION:**

Provide any further details you think may be relevant, for example, whether you approached the person(s) concerned, any financial impact to HLM Takaful, etc.