

# **WHISTLEBLOWING POLICY**

	Reference in the relevant legislations/ regulations
<p><b>1. PURPOSE</b></p> <p>To provide an avenue for employees of Hong Leong MSIG Takaful Berhad (“HLMT”) and any other persons to raise genuine concerns about any improper conduct or wrongful act (“Improper Conduct”) involving HLMT<sup>1</sup> through HLMT’s whistleblowing channel on a confidential basis.</p>	APG para 4.3.1(b)(i)
<p><b>2. SCOPE OF APPLICATION</b></p> <p>The following persons may raise any genuine concerns about any Improper Conduct vide HLMT’s whistleblowing channel:</p> <p>a) Any employee or director of HLMT; and</p> <p>b) Any (legal or natural) person, including but not limited to those providing services to, or having a business relationship with, HLMT.</p>	
<p><b>3. POLICY STATEMENT</b></p> <p>HLMT is committed to good business ethics and integrity as set out in HLMT’s Code of Conduct and Ethics. You are encouraged to raise genuine concerns about Improper Conduct involving HLMT at the earliest opportunity, and in an appropriate way, through available channels specified under this Whistleblowing Policy.</p>	APG para 4.1.3(iv)
<p><b>4. TYPES OF CONCERNS THAT MAY BE RAISED</b></p> <p>4.1 You should raise any genuine concerns about any Improper Conduct involving HLMT and / or that may adversely impact HLMT, including but not limited to:</p> <ul style="list-style-type: none"><li>• Any criminal offences, including fraud, corruption, bribery and blackmail;</li><li>• Any failure to comply with legal or regulatory obligations;</li><li>• Any improper conduct which would be a disciplinary offence; and</li><li>• Any gross mismanagement of company affairs.</li></ul> <p>4.2 Please note that any grievances of a personal nature or that relates to your employment should be raised through HR grievance procedures and not through this Whistleblowing Policy or the Whistleblower Form.</p>	

<sup>1</sup> This includes any person associated with HLMT, i.e., its director, employee (whether temporary, fixed-term, or permanent), trainee, seconded staff, casual worker, agency staff, volunteer, intern, agent, partner, contractor, subcontractor, consultant, representative and person or entity performing work or services for or on behalf of HLMT.

If the subject matter of the report relates to matters other than Improper Conduct, such as a general enquiry or a complaint on HLMT's products or services, you may contact our Customer Service for further information, enquiries or redress using the following contact details:

Telephone: 03-76501800; or

Email: [ReachUs@takaful.hongleong.com.my](mailto:ReachUs@takaful.hongleong.com.my)

- 4.3 Any genuine concerns on Improper Conduct involving and / or affecting HLMT shall be raised vide the respective whistleblowing channels in Section 5 below. However, where the alleged Improper Conduct concerns the designated recipient of a whistleblowing report in HLMT, such concern may be reported through [Hong Leong Financial Group \("HLFG"\)'s whistleblowing channel](#).

CGPD para  
18.2(a)

## 5. WHO TO RAISE CONCERNS TO

- 5.1 All whistleblowing reports of any alleged Improper Conduct are to be sent:

- i. In writing to HLMT's registered address as below and shall be opened by the addressee; or

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.

- ii. By email to the HLMT's dedicated email address:  
[whistleblowing@takaful.hongleong.com.my](mailto:whistleblowing@takaful.hongleong.com.my)

- 5.2 The following persons shall have access to the dedicated 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 HLMT Board<sup>2</sup>

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

CGPD para  
18.2(b)

- 5.4 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.

WPA S10(1) &  
(5)

- 5.5 HLMT reserves the right not to investigate any alleged Improper Conduct which is raised anonymously.

<sup>2</sup> Independent and Non-Executive Director.

Additionally, you also have the right to raise your concerns with relevant regulators, such as [Bank Negara Malaysia](#), [Malaysian Anti-Corruption Commission](#) or other law enforcement agencies.

- 5.6 If the subject matter of the report relates to matters other than Improper Conduct, such as a general enquiry or a complaint on HLMT's products or services, you may contact our Customer Services for further information, enquiries or redress using the following contact details:

Telephone: 03-76501800; or

Email: [ReachUs@takaful.hongleong.com.my](mailto:ReachUs@takaful.hongleong.com.my)

### **ACTIONS WHICH MAY BE TAKEN AGAINST YOU**

6. 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.

APG para  
4.3.1(b)(iii)

### **DISCLOSURE OF YOUR PERSONAL INFORMATION**

7. Please note that we may have to disclose your personal information to the 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.

### **YOUR INVOLVEMENT IN THE INVESTIGATION**

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

### **DEFINITIONS AND ABBREVIATIONS**

9. The definitions and abbreviations used in this document are as follows:

	<b>WHISTLEBLOWING POLICY</b>	<b>Issue Date: 25 January 2022</b>
		<b>Version No: 8.0</b>

APG	Guidelines on Adequate Procedures issued by the Prime Minister’s Department pursuant to S17A(5) of Malaysian Anti-Corruption Commission Act 2009
CEO	Chief Executive Officer of HLMT
CGPD	Corporate Governance policy document issued by Bank Negara Malaysia
CRO	Chief Risk Officer of HLMT
EXCO	Executive Committee of HLMT
GBAC	Group Board Audit Committee
GBRMC	Group Board Risk Management Committee
HLAH	HLA Holdings Sdn Bhd
HLFG	Hong Leong Financial Group Berhad
HLMT	Hong Leong MSIG Takaful Berhad
HR	Human Resources of HLMT
SOP	Standard Operating Procedures
WPA	Whistleblower Protection Act 2010

## 10. POLICY INFORMATION

<b>Policy Owner</b>	Chief Compliance Officer of HLMT	
<b>Responsible Person(s)</b>	Head, Internal Auditor (in respect of the (a) Retained Documents (as defined in the Whistleblowing Standard Operating Procedures), save for whistleblowing reports which implicate the Head, Internal Auditor; and (b) register of all whistleblowing reports, as set out in the Whistleblowing Standard Operating Procedures)	
<b>Version No. and date Approved</b>	Version 1.0	18 January 2017
	Version 2.0	23 November 2017
	Version 3.0	22 October 2018
	Version 4.0	23 January 2019
	Version 5.0	21 November 2019
	Version 6.0	21 April 2020
	Version 7.0	5 November 2020
	Version 8.0	25 January 2022
<b>Summary of Revisions</b>	<p><u>Version 1.0</u> New</p> <p><u>Version 2.0</u> Revised the content</p> <p><u>Version 3.0</u> Revised the content</p> <p><u>Version 4.0</u> Revised the content</p> <p><u>Version 5.0</u> 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.</p>	

	<p><u>Version 6.0</u> Included the information on who can raise concerns, i.e., any (legal or natural) person including those providing services to, or having a business relationship with HLMT.</p> <p><u>Version 7.0</u></p> <ol style="list-style-type: none"> <li>I. Updated to align with prescribed policy format in the Documentation Policy.</li> <li>II. Added the Policy Statement.</li> <li>III. Extended application of policy to directors.</li> <li>IV. Expanded on list of types of genuine concerns that may be raised.</li> <li>V. Limited HLMT whistleblowing channel to genuine concerns raised relating to Improper Conduct in HLMT 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.</li> <li>VI. Provided situations where whistleblowing protection may be revoked.</li> <li>VII. Provided for disclosure of whistleblowers personal information where required.</li> <li>VIII. Provided for whistleblower’s involvement in investigation where required.</li> <li>IX. Updated Whistleblower form.</li> </ol> <p><u>Version 8.0</u></p> <ol style="list-style-type: none"> <li>I. Updated to align with prescribed policy format in the Governing Documents SOP.</li> <li>II. Changed references from “occurring in” to “involving” to broaden the scope to any Improper Conduct that involves HLMT.</li> <li>III. Added footnote 1 to describe the persons associated with HLMT.</li> <li>IV. Inserted a new dedicated HLMT email address.</li> <li>V. To remove Chairman of HLAH and to include the Chairman of HLMT Board as one of the Designated Recipients of cases escalated through the whistleblowing channel.</li> <li>VI. Added paragraph 5.6 to direct matters other than Improper Conduct.</li> <li>VII. Removed Board of Directors from disclosure of personal information and replaced by Designated Recipients.</li> <li>VIII. Updated the Whistleblower Form to be consistent with the wordings in this policy.</li> </ol>
Effective Date	25 January 2022
Next Review Date	25 January 2023
Relevant Legislation	<ol style="list-style-type: none"> <li>1. Whistleblower Protection Act 2010</li> <li>2. Guidelines on Adequate Procedures issued by the Prime Minister’s Department pursuant to S17A(5) of Malaysian Anti-Corruption Commission Act 2009</li> </ol>

Related Policies and Procedures	3. Corporate Governance policy document issued by BNM 1. HLMT Code of Conduct and Ethics 2. HLMT Anti-Corruption System Policy 3. HLMT Compliance Policy 4. HLMT Whistleblowing SOP 5. HLMT Anti-Corruption SOP
Reviewed and Concurred By and Date Reviewed and Concurred	Head, Internal Audit 8 October 2021
Endorsed By and Date Endorsed	CEO 15 October 2021  EXCO 25 October 2021  Shariah Committee 2 November 2021  HLAH GBRMC 11 January 2022  HLAH GBAC 14 January 2022
Approved By and Date Approved	HLMT Board 25 January 2022

## Appendix 1

**WHISTLEBLOWER FORM**

You should raise any genuine concerns about any improper conducts or wrongful acts involving Hong Leong MSIG Takaful Berhad (“HLMT”). If your concern is about your personal position, rather than a concern about malpractice, it will be more appropriate for you to use the HR grievance procedures.

<b>YOUR RELATIONSHIP WITH HONG LEONG MSIG TAKAFUL BERHAD</b>	<b>Please tick all applicable:</b> Employee: <input type="checkbox"/> Non-Employee: <input type="checkbox"/>
	<b>NON-EMPLOYEE:</b> Please specify your relationship. Please include your employer’s details if your employer provides services to or otherwise has a business relationship with Hong Leong.
<b>YOUR STAFF ID (If you are a HLMT staff)</b>	
<b>YOUR CONTACT DETAILS</b>	<b>Name:</b> <b>Address:</b>  <b>Telephone:</b> <b>Email:</b>



**DETAILS OF YOUR CONCERNS**  
(please provide as much information as possible)

**DESCRIPTION OF INCIDENT:**

(use the additional information sheet, if necessary)

**WHERE DID THE INCIDENT OCCUR?****WHEN DID THE INCIDENT OCCUR?****NAME AND POSITION OF PERSON(S) INVOLVED:****DETAILS OF ANY WITNESS(ES):****DID YOU REPORT THE INCIDENT 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 HLMT, etc.