

WHISTLEBLOWING POLICY

Table of Contents

1.	PURPOSE	3
2.	SCOPE	3
3.	POLICY STATEMENT	3
4.	TYPES OF CONCERNS THAT MAYBE RAISED	3
5.	WHO TO RAISE CONCERNS TO	4
6.	ACTIONS WHICH MAYBE TAKEN AGAINST YOU	5
7.	DISCLOSURE OF YOUR PERSONAL INFORMATION	5
8.	YOUR INVOLVEMENT IN THE INVESTIGATION	5
9.	DEFINITIONS	6
10.	POLICY INFORMATION	6
11.	WHISTLEBLOWER INFORMATION	12

	WHISTLEBLOWING POLICY	Issue Date: 24 January 2024 Version No: 10.0
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	Reference in the relevant legislations/ regulations
<p>1. PURPOSE</p> <p>To provide an avenue for employees of Hong Leong MSIG Takaful Berhad (“HLMT”) and any other person to raise genuine concerns about any improper conduct or wrongful act (“Improper Conduct”) involving HLMT and/or any person associated with HLMT through HLMT’s whistleblowing channel on a confidential basis.</p>	<p>Guidelines on Adequate Procedures (“APG”) para 4.3.1(b)</p>
<p>2. SCOPE</p> <p>2.1 The following persons may raise any genuine concerns about any Improper Conduct vide HLMT’s whistleblowing channel:</p> <ul style="list-style-type: none"> a) any employee or director of HLMT; and b) any (legal or natural) person, including those providing services to, or having a business relationship with, HLMT. <p>2.2 The principles in HLMT Whistleblowing Policy are to be aligned and consistent with the Hong Leong Financial Group (“HLFG”)’s Whistleblowing Policy.</p>	
<p>3. POLICY STATEMENT</p> <p>HLMT is committed to good business ethics and integrity as set out in HLMT’s Code of Conduct and Ethics. All persons are encouraged to raise genuine concerns about Improper Conduct involving HLMT and/or any person associated with HLMT at the earliest opportunity, and in an appropriate way, through available channels specified under this Whistleblowing Policy or HLMT’s Compliance Policy (for employees).</p>	<p>APG para 4.1.3(iv)</p>
<p>4. TYPES OF CONCERNS THAT MAY BE RAISED</p> <p>4.1 You should raise any genuine concerns about any Improper Conduct involving HLMT and/or any person associated with HLMT, including but not limited to:</p> <ul style="list-style-type: none"> • Any criminal offences, including fraud, corruption, bribery and blackmail; • Any misappropriation or misuse of funds or assets, theft or embezzlement; • Any financial irregularity or impropriety; • Any failure to comply with legal or regulatory obligations; • Any breach of HLMT’s Code of Conduct and Ethics or Improper Conduct which would be a disciplinary offence; or • Any gross mismanagement of Company’s affairs. 	

- 4.2 Please note that any grievance of a personal nature or relates to your employment should be raised through the HLMT Human Resources Department (“HR”) grievance procedures and not through this Whistleblowing Policy or the Whistleblower Form.
- 4.3 Genuine concerns on Improper Conduct involving HLMT and/or any person associated with 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 shall be reported through HLFG’s whistleblowing channel.

5. WHO TO RAISE CONCERNS TO

- 5.1 Reports of any alleged Improper Conduct shall be made to:

The 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 address: whistleblowing@takaful.hongleong.com.my

The only persons shall have access to the above email address:

1. Chairman of the Group Board Audit Committee (“GBAC”);
2. Chairman of the Group Board Risk Management Committee (“GBRMC”); and
3. Chairman of HLA Holdings Sdn. Bhd. (“HLAH”) Board of Directors.

- 5.2 Where the alleged Improper Conduct concerns the Chairman of the Group Board Audit Committee, the report shall be made to:

The Chairman, Board Audit and Risk Management Committee
Hong Leong Financial Group Berhad,
Level 30, Menara Hong Leong,
No.6, Jalan Damanlela,
Bukit Damansara
50490 Kuala Lumpur.
Email: hlfghwhistleblowing@hongleong.com.my

- 5.3 Where the Whistleblowing report names or implicates the Head of Internal Audit or any Internal Audit team member, the Retained Documents shall be filed and retained by the person appointed by the Chairman of GBAC.
- 5.4 Please include your full name and contact details, as well as full details of your concern(s) and any supporting documentation you consider relevant. Should you wish to do so, you may use our Whistleblower Form to provide the details required.

Corporate
Governance
Policy
Document
 (“CGPD”) para
18.2(a);
APG para
4.3.1(b)(i)

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

CGPD para 18.2(b)

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

5.7 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

6. ACTIONS WHICH MAY BE TAKEN AGAINST YOU

Whistleblower Protection Act ("WPA") s10(1) & (5)

6.1 Subject to sub-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 concern(s) 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 Improper Conduct you disclosed is frivolous or vexatious;
- (d) your disclosure of the Improper Conduct is made maliciously; or
- (e) your 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 Head of Internal Audit, and/or the investigation team (collectively, "Recipients") in order to follow up and, if appropriate, act on your complaint, or where required by law or regulatory authorities. Your personal information and your whistleblowing report will not be disclosed to a Recipient that is implicated in the Improper Conduct reported. 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.

APG para 4.3.1(b)(iii)

8. YOUR INVOLVEMENT IN THE INVESTIGATION

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

9. DEFINITIONS

The following terms used in this Policy are as follows:

Company/HLMT	Hong Leong MSIG Takaful Berhad
APG	Guidelines on Adequate Procedures issued by the Prime Minister's Department pursuant to S17A(5) of Malaysian Anti-Corruption Commission Act 2009
CGPD	Policy Document on Corporate Governance issued by Bank Negara Malaysia
GBAC	Group Board Audit Committee
GBRMC	Group Board Risk Management Committee
HLAH	HLA Holdings Sdn Bhd
HLFG	Hong Leong Financial Group Berhad
HR	Human Resources of HLMT
Improper Conduct	any improper conduct or wrongful act
WPA	Whistleblower Protection Act 2010

10. POLICY INFORMATION

Policy Owner	Chief Compliance Officer of HLMT	
Responsible Person(s)	Head of Internal Audit (in respect of the (a) Retained Documents (as defined in the Whistleblowing Standard Operating Procedures), save for whistleblowing reports which implicate the Head of Internal Audit; and (b) register of all whistleblowing reports, as set out in the Whistleblowing Standard Operating Procedures)	
Version No. and date Approved	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
	Version 9.0	30 January 2023
	Version 10.0	xx January 2024
Summary of Revisions	<u>Version 1.0</u> New <u>Version 2.0</u> Revised the content <u>Version 3.0</u> Revised the content <u>Version 4.0</u> Revised the content	

Version 5.0

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.

Version 6.0

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.

Version 7.0

- I. Updated to align with prescribed policy format in the Documentation Policy.
- II. Added the Policy Statement.
- III. Extended application of policy to directors.
- IV. Expanded on list of types of genuine concerns that may be raised.
- 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.
- VI. Provided situations where whistleblowing protection may be revoked.
- VII. Provided for disclosure of whistleblowers personal information where required.
- VIII. Provided for whistleblower’s involvement in investigation where required.
- IX. Updated Whistleblower form.

Version 8.0

- I. Updated to align with prescribed policy format in the Governing Documents SOP.
- II. Changed references from “occurring in” to “involving” to broaden the scope to any Improper Conduct that involves HLMT.
- III. Added footnote 1 to describe the persons associated with HLMT.
- IV. Inserted a new dedicated HLMT email address.
- 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.
- VI. Added paragraph 5.6 to direct matters other than Improper Conduct.
- VII. Removed Board of Directors from disclosure of personal information and replaced by Designated Recipients.
- VIII. Updated the Whistleblower Form to be consistent with the wordings in this policy.

Version 9.0

- I. Paragraph 4.1 – Added the following items to non-exhaustive list of examples of Improper Conduct:
 - Any misappropriation or misuse of funds or assets, theft

- or embezzlement
- Any financial irregularity or impropriety
- Any breach of HLMT's Code of Conduct and Ethics
- II. Paragraph 4.3 – Amended 'may' to 'shall' to indicate mandatory reporting channel.
- III. Paragraph 7 – Added 'Chief Internal Auditor' to the list of persons who may receive personal information of a Whistleblower. Added statement that personal information of the whistleblower will not be disclosed to a recipient who is implicated in the Improper Conduct reported.

Version 10.0

- i) Added 'Table of Contents'
- ii) Section 1 'Purpose' - Added 'and/or any person associated with HLMT'.
- ii) Section 2 'Scope':
 - a) Deleted 'of Application'.
 - b) Added paragraph number '2.1' and replaced 'A' with 'a' for 2.1(a) and 2.1(b).
 - c) Deleted 'but not limited to'.
 - d) Added paragraph '2.2'.
- iii) Section 3 'Policy Statement':
 - a) Replaced 'You' with 'all person'; and
 - b) Added 'and/or any person associated with HLMT'.
 - c) Added 'specified' after 'available channels' and 'or HLMT's Compliance Policy (for employees)' after 'Whistleblowing Policy'.
- iv) Section 4 'Types of Concerns that may be Raised':
 - a) Paragraph 4.1 – Added 'and/or any person associated with HLMT'.
 - b) Paragraph 4.2:
 - Removed '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
– Added 'the HLMT Human Resources Department'.
 - c) Paragraph 4.3 – Added 'and/or any person associated with HLMT'.
- v) Section 5 'Who to Raise Concerns to':
 - a) Added to Paragraph 5.1 – 'The following persons shall have access to the above 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.'
 - b) Removed paragraphs 5.2 and 5.3:

'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.'

'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.'

Replaced with:

'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.' – previously Paragraph '5.2'.

'5.5 HLMT reserves the right not to investigate any alleged Improper Conduct which is raised anonymously.' – previously Paragraph '5.3'.

c) Added paragraph number 5.2 previously under paragraph 5.1.

d) Added Paragraph 5.3:

'Where the Whistleblowing report names or implicates the Head of Internal Audit or any Internal Audit team member, the Retained Documents shall be filed and retained by the person appointed by the Chairman of GBAC.'

e) Paragraph 5.4 was previously sub-paragraph 5.5.

f) Removed paragraph 5.6:

'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.'

g) Added 'Paragraph 5.7':

'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 '.

	<ul style="list-style-type: none"> vi) Section 7 ‘Disclosure of Your Personal Information’: <ul style="list-style-type: none"> a) Deleted ‘board of directors’ and replaced with ‘Head of Internal Audit’. b) Added ‘and your whistleblowing report’. vii) Section 9 ‘Definitions’: <ul style="list-style-type: none"> a) Deleted ‘and Abbreviations’. b) Deleted ‘definitions and abbreviations’ and document and replaced with ‘following terms’ and ‘Policy’. c) Added ‘Company/HLMT’ refers to Hong Leong MSIG Takaful Berhad. d) Deleted ‘CEO’ refers to Chief Executive Officer of HLMT’, ‘CRO’ refers to Chief Risk Officer’ and ‘EXCO’ refers to ‘Executive Committee of HLMT’. e) Changed from ‘Corporate Governance policy document’ to ‘Policy Document on Corporate Governance’. f) Deleted ‘SOP’ refers to ‘Standard Operating Procedures’ and replaced with ‘Improper Conduct’ refers ‘any improper conduct or wrongful act’. viii) Section 10 ‘Policy Information’ on <ul style="list-style-type: none"> (a) ‘Relevant Legislation’ – Changed ‘Corporate Governance policy document’ to ‘Policy Document on Corporate Governance’. (b) ‘Related Policies and Procedures – Changed the name convention of: <ul style="list-style-type: none"> 1) ‘HLMT Anti-Corruption System Policy’ to ‘HLMT Anti-Bribery and Corruption Policy’; and 2) ‘HLMT Anti-Corruption SOP’ to ‘HLMT Anti-Bribery and Corruption SOP’. ix) Whistleblower Form: <ul style="list-style-type: none"> (a) Added these to the paragraph: <ul style="list-style-type: none"> 1) (“Improper Conduct”). 2) ‘and/or any person associated with HLMT through whistleblowing@takaful.hongleong.com.my.’ 3) ‘or your employment,’ 4) ‘and not through this Whistleblower Form.’ (b) Added ‘your full name’, ‘name of your employer’, ‘your department’ and ‘your position/designation’. (c) Deleted ‘rather than a concern about malpractice, it will be more appropriate for you to use the’. (d) Changed ‘INCIDENT’ to ‘IMPROPER CONDUCT’.
Effective Date	24 January 2024
Next Review Date	23 January 2025
Relevant Legislation	<ul style="list-style-type: none"> 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. Policy Document on Corporate Governance issued by BNM.
Related Policies and Procedures	<ul style="list-style-type: none"> 1. HLMT Code of Conduct and Ethics 2. HLMT Anti-Bribery and Corruption Policy 3. HLMT Anti-Bribery and Corruption SOP 4. HLMT Compliance Policy 5. HLMT Whistleblowing SOP

	WHISTLEBLOWING POLICY	Issue Date: 24 January 2024 Version No: 10.0
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Reviewed and Concurred By and Date Reviewed and Concurred	Chief Compliance Officer 8 January 2024
Endorsed By and Date Endorsed	EXCO 10 January 2024 Shariah Committee 11 January 2024 HLAH GBAC 18 January 2024
Approved By and Date Approved	HLMT Board 24 January 2024

WHISTLEBLOWER FORM

You should raise any genuine concerns about any improper conduct or wrongful act (“Improper Conduct”) involving Hong Leong MSIG Takaful Berhad (“HLMT”) and/or any person associated with HLMT through whistleblowing@takaful.hongleong.com.my. Concerns on your personal position or your employment, should be raised through HR grievance procedures, and not through this Whistleblower Form.

YOUR RELATIONSHIP WITH HLMT	Please tick all applicable: Employee: <input type="checkbox"/> Non-Employee: <input type="checkbox"/>
	NON-EMPLOYEE: Please specify your relationship. Please include your employer’s details if your employer provides services to or otherwise has a business relationship with HLMT.
YOUR FULL NAME	
NAME OF YOUR EMPLOYER	
YOUR STAFF ID (if an employee of HLMT)	
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 HLMT, etc.