



HongLeong

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MSIG Takaful

WHISTLEBLOWING POLICY

**Issue Date: 21 November
2019**

Version No: 5.0

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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



1. Purpose

To provide guidance in reporting of any concerns on improper conduct or wrongful act that may adversely impact Hong Leong MSIG Takaful Bhd (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.

2. Scope

This Policy applies to all employees of HLM Takaful and any (legal or natural) person 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 the Hong Leong Group Code of Ethics. All employees are encouraged to raise concerns about improper conduct at the earliest opportunity, and in an appropriate way.

4. Principles

This policy aims to allow standardization of the submission process of any improper or wrongful act that may adversely impact HLM Takaful.

5. Reference

The Policy should be read in conjunction with the following documents and any relevant guidelines / circulars issued by Bank Negara Malaysia (BNM) from time to time:

- BNM Corporate Governance Policy Document
- HLM Takaful Code of Conduct and Ethics
- Hong Leong Financial Group Code of Conduct and Ethics

6. Schedule

None

7. Policy Information

Subordinate Schedules	None
Policy Owner/Administrator	Compliance Department
Accountable Officer	Chief Compliance Officer
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	A revised version 5.0 to include the following: c. 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.
Approved Date	21 November 2019
Effective Date	21 November 2019
Next Review Date	21 November 2020
Relevant Legislation	The principal requirement applicable to the Company is set out in the BNM Policy Document Corporate Governance.
Related Policies	Hong Leong Group Code of Ethics
Related Procedures	HLM Takaful Code of Conduct and Ethics
Related forms, publications and websites	Whistleblowing Form
Definitions that relate to this policy only	<ul style="list-style-type: none">• “Company” means Hong Leong MSIG Takaful Berhad.• “Policy” means this Whistleblowing Policy.
Version No.	5.0
Reviewed and Concurred By	Executive Committee (EXCO) Date: 6 November 2019
Endorsed By	Shariah Committee Date: 6 November 2019 Group Board Risk Management Committee Date: 13 November 2019
Approved By	Board Date: 21 November 2019

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Hong Leong MSIG Takaful Berhad (“HLM Takaful”) is committed to good business ethics and integrity as set out in the Hong Leong Group Code of Ethics. All employees are encouraged to raise concerns about improper conduct at the earliest opportunity, and in an appropriate way.

1. Who can raise concerns?

- Any employee of Hong Leong MSIG Takaful Berhad (HLM Takaful).
- Any (legal or natural) person providing services to, or having a business relationship with HLM Takaful.

2. What types of concerns should you raise?

You should raise any concerns about any improper conduct or wrongful act 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 concerns about malpractice should be raised. 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.

3. Who should you raise your concerns with?

Reports of concerns over directors, senior management or any staff of HLM Takaful may be made to either one of the following:

a. In writing 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.

or;

by email to: 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 and member of the GBAC as well as GBRMC.

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 the GBAC.

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4. What do you need to do?

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 (Appendix 1) to provide the details required.

HLM Takaful reserves the right not to investigate any concerns which are raised anonymously.

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

5. What action can be taken against you?

You will be protected from retaliation, adverse employment action and from disclosure of your identity, provided your disclosure was made in good faith, (even if you are genuinely mistaken in the concerns you raise) and to the extent permitted by law.

**WHISTLEBLOWER
FORM**



You should raise any concerns about any improper conduct or wrongful act that may adversely impact Hong Leong MSIG Takaful Berhad (“HLM Takaful”). 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.

YOUR RELATIONSHIP WITH HONG LEONG MSIG TAKAFUL BERHAD	<p>Please tick all applicable: Employee: <input type="checkbox"/> Non-Employee: <input type="checkbox"/></p> <p>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 Hong Leong.</p>
YOUR STAFF ID (If you are a HLM Takaful staff)	
YOUR CONTACT DETAILS	<p>Name: Address:</p> <p>Telephone: Email:</p>

DETAILS OF YOUR CONCERNS
(please provide as much information as

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 HLM Takaful, etc.