

WHISTLEBLOWING POLICY

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1. PURPOSE

To provide an avenue for all employees of Hong Leong Bank Group (“HLBG” or the “Bank”), and any (legal or natural) person including those providing services to, or having a business relationship with the Bank, to raise genuine concerns about any improper conduct or wrongful act (“Improper Conduct”) that is committed involving the Bank and/or persons associated with the Bank (“Associated Persons”)* through the HLBG’s whistleblowing channels on a confidential basis.

* “**Associated Persons**” refers to all directors, employees (whether temporary, fixed term, or permanent), trainees, seconded staff, casual workers, agency staff, volunteers, interns, agents, of the Bank including partners, contractors, subcontractors, vendors, suppliers, service providers, consultants, representatives and others performing work or services for or on behalf of the Bank, or any other person or persons associated with the Bank.

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2. SCOPE

This Whistleblowing Policy is applicable at HLBG [i.e. Hong Leong Bank Berhad and all its subsidiaries and branches]. However, HLBG's overseas subsidiaries have their own Whistleblowing Policy which is aligned and consistent with this HLBG's Whistleblowing Policy.

The following persons may raise any genuine concerns about any Improper Conduct vide HLBG's whistleblowing channels:

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

3. POLICY STATEMENT

A fundamental value of the Bank is that we are 'Here for the Long Term'. In upholding this value, the Bank commits to a high standard of professionalism and ethics in the conduct of our business and professional activities as set out in the HLBG's Code of Conduct & Ethics ("Code"). All persons are encouraged to raise genuine concern about any actual or potential Improper Conduct involving HLBG and/or Associated Persons that compromises these aspirations and consequently have the potential to tarnish the Bank's reputation and community standing.

Such genuine concerns should be raised at the earliest opportunity and in an appropriate way, through available channels provided under this Whistleblowing Policy or following the internal escalation process as provided under the HLBG's Board Policy on Group Compliance (for employees).

4. PRINCIPLES

You must speak up if you witness or if you are improperly instructed or advised to carry out illegal or unethical acts, by the Bank's employees, customers, vendor or other business partners

Whistleblower reports will be treated with strict confidentiality and only shared where necessary, for example with persons who are involved in investigating, resolving, or remediating the issue.

Concerns that may be raised through whistleblowing should be genuine concerns about any Improper Conduct involving HLBG and/or that may adversely impact HLBG, including but not limited to:

- a) Any integrity / honesty or criminal offences, including fraud, theft, criminal breach of trust, corruption, bribery and blackmail;
- b) Any failure to comply with legal or regulatory obligations;
- c) Violations of the Bank's Policies, Procedures and Standards;
- d) Any improper conduct which would be a disciplinary offence; or
- e) Any gross mismanagement of company affairs.

Please note that any grievance of a personal nature or that is related to your employment should be raised through Human Resources (HR) channel and not through this Whistleblowing Policy or the Whistleblower Form.

5. PROCEDURE

Any disclosure of Improper Conduct that concerns the Bank must be made to any of the relevant Designated Person through the communication channels as set out in HLBG's whistleblowing channels listed below:

Hong Leong Bank Berhad (HLBB) and Its Branches and Subsidiaries	Hong Leong Islamic Bank Berhad (HLISB) Only
<p>Ms. Christine Lau Souk Huan Chairman of the Board Audit Committee Level 6, Menara Hong Leong, No 6, Jalan Damanlela, Bukit Damansara, 50490 Kuala Lumpur.</p> <p>christinelau@hongleong.com.my</p>	<p>Encik Alan Hamzah Sendut Chairman of the Board Audit and Risk Management Committee Level 6, Menara Hong Leong, No 6, Jalan Damanlela, Bukit Damansara, 50490 Kuala Lumpur.</p> <p>Alanhamzah@hongleong.com.my</p>
OR	OR
<p>YBhg Datuk Manharlal a/I Ratilal @ Datuk George Ratilal Director of Hong Leong Bank Berhad Level 6, Menara Hong Leong, No 6, Jalan Damanlela, Bukit Damansara, 50490 Kuala Lumpur.</p> <p>george.ratilal@hongleong.com.my</p>	<p>Puan Rowina Ghazali Seth Director of Hong Leong Islamic Bank Berhad Level 6, Menara Hong Leong, No 6, Jalan Damanlela, Bukit Damansara, 50490 Kuala Lumpur.</p> <p>rowina@hongleong.com.my</p>

5. PROCEDURE (cont'd)

Whistleblowers are advised to make their disclosures in writing and to provide sufficient details which include the following:

- a) the type or description of Improper Conduct;
- b) the name of individuals who have committed or are involved in the Improper Conduct;
- c) full details of the concern raised, including the 'what', 'when' and 'where' in relation to the Improper Conduct; and
- d) the relevant supporting documents or evidence, if any.

Should you wish to do so, you may use our [Whistleblower Form](#) to provide the details required.

Whistleblowers are encouraged to provide their full name and contact details, to facilitate the Bank to clarify or obtain further information for purposes of further investigation into the Improper Conduct.

Any person who elect to remain anonymous is advised that the Bank's ability to investigate the alleged Improper Conduct is limited to the extent of the contents of the report received by the Bank. Where insufficient information is provided, the Bank reserves the right not to investigate the alleged Improper Conduct that is raised anonymously, due to the inability to seek clarification to ascertain relevant facts for investigation purposes.

Whistleblowers also have the right to report to relevant government or regulatory authorities and enforcement agencies in Malaysia as prescribed by the Whistleblower Protection Act 2010 such as Bank Negara Malaysia (BNM), Malaysian Anti-Corruption Commission (MACC), Police, etc.

6. WHISTLEBLOWER PROTECTION

Subject to paragraph 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).

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.

If you have concerns about possible retaliatory action or adverse employment action, you may lodge a report to the Chairperson of the Board Audit Committee (BAC) for HLB or Board Audit Risk Management Committee (BARMC) for HLISB through the Bank's Whistleblowing channels.

7. DISCLOSURE OF PERSONAL INFORMATION

Please note that the Bank may disclose your personal information to the board of directors, investigation team and designated Compliance personnel (“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 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.

8. INVOLVEMENT OF WHISTLEBLOWER IN THE INVESTIGATION

Whistleblowers may be requested to assist when more information is needed during the investigation of the alleged Improper Conduct. In the event the whistleblower is implicated or discovered to be or has been involved in any improper conduct, he/she may also be investigated so as to complete the fact-finding process.

9. CONFLICT OF INTEREST

The investigation procedures and handling of whistleblowing reports are handled in an unbiased, impartial and objective manner. Any person that is with an actual or perceived conflict of interest with a particular whistleblower report shall be excluded as appropriate, and shall declare the same to the Chairman of BAC/BARMC or to other designated persons (where relevant).

10. REFERENCE

This Policy has been formulated to include HLBB / HLISB internal requirements as well as regulatory requirements from the following regulatory guidelines:

- BNM Corporate Governance Policy Document (BNM/RH/PD 029-9), paragraph 18.2
- Malaysian Anti-Corruption Commission Act 2009

WHISTLEBLOWER FORM

You should raise any genuine concerns about any improper conduct or wrongful act (“Improper Conduct”) involving Hong Leong Bank Berhad or Hong Leong Islamic Bank Berhad. Concerns on your personal position or your employment, should be raised through Human Resources (HR) channel, and not through this Whistleblower Form.

YOUR RELATIONSHIP WITH HONG LEONG	<p>Please tick all applicable:</p> <p>Customer: <input type="checkbox"/></p> <p>Employee: <input type="checkbox"/></p> <p>OTHER: 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>
ACCOUNT TYPE(S) (For customers)	<p>Please tick all applicable types:</p> <p>Current account: <input type="checkbox"/> Savings account: <input type="checkbox"/></p> <p>Loan: <input type="checkbox"/> Mortgage: <input type="checkbox"/></p> <p>OTHER: Please specify Hong Leong products/services which are provided to you.</p>
YOUR STAFF ID (If you are a Hong Leong Bank staff)	
YOUR CONTACT DETAILS	<p>Full Name:</p> <p>Address:</p> <p>Telephone:</p> <p>Email:</p>

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 the Hong Leong Bank Group, etc.