

WHISTLEBLOWING POLICY

1. PURPOSE

To provide an avenue for employees of HLA Holdings Sdn Bhd (“HLAH”) and any other person to raise genuine concerns about any improper conduct or wrongful act (“Improper Conduct”) involving HLAH¹ through HLAH’s whistleblowing channel on a confidential basis.

2. SCOPE

- 2.1 The following persons may raise any genuine concerns about any Improper Conduct vide HLAH’s whistleblowing channel:
- (a) any employee or director of HLAH; and
 - (b) any legal or natural person, including but not limited to those providing services to, or having a business relationship with, HLAH.
- 2.2 The principles in HLAH Whistleblowing Policy are to be aligned and consistent with the Hong Leong Financial Group (“HLFG”)’s Whistleblowing Policy.

3. POLICY STATEMENT

HLAH is committed to good business ethics and integrity. All persons¹ are encouraged to raise genuine concerns about Improper Conduct involving HLAH and/or that may adversely impact HLAH at the earliest opportunity, and in an appropriate way, through available channels specified under this Whistleblowing Policy.

4. TYPES OF CONCERNS THAT MAY BE RAISED

- 4.1 You should raise any genuine concerns about any Improper Conduct involving HLAH and/or that may adversely impact HLAH, including but not limited to:
- 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 Improper Conduct which would be a disciplinary offence; or
 - Any gross mismanagement of the Company’s affairs.
- 4.2 Please note that grievance of a personal nature or relates to your employment should be raised through the Human Resources Department (“HR”) grievance procedures and not through this Whistleblowing Policy or the Whistleblower Form.

¹ This includes any person associated with HLAH, 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 HLAH.

- 4.3 Any genuine concern(s) on Improper Conduct involving HLAH and/or affecting HLAH shall be raised via the respective whistleblowing channels in Section 5 below. However, where the alleged Improper Conduct concerns the designated recipient of a whistleblowing report in HLAH, such concern shall be reported through HLAH'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 Assurance Berhad
Level 3, Tower B, PJ City Development
No.15A, Jalan 219
Seksyen 51A
46100 Petaling Jaya, Selangor Darul Ehsan
E-mail: whistleblowing-hlah@hla.hongleong.com.my

- 5.2 The following 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.

- 5.3 Where the Whistleblowing report names or implicates the Head, Insurance Audit/ Chief Internal Auditor or any Internal Audit team member, the Retained Document 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.

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

Additionally, you also have the right to raise your concern(s) with the relevant regulators, such as Bank

- 5.6 Negara Malaysia, Malaysian Anti-Corruption Commission or other law enforcement agencies.

6. ACTIONS WHICH MAY BE TAKEN AGAINST YOU

- 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 Insurance Audit/ Chief Internal Auditor, 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 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. 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 defined as follows:

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